

FY 2020 MTW Annual Plan

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Moving to Work Annual Plan

Fiscal Year 2020

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Housing Authority of Baltimore City
Moving to Work Annual Plan – Fiscal Year 2020

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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) 2020, i.e. the period from January 1, 2020 through December 31, 2020.

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 2020. 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 2020 are all designed to promote one or more of the MTW statutory objectives.

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

B. MTW Long-Term Goals and Objectives

Throughout 2019, HABC undertook a comprehensive organizational review, portfolio assessment and strategic planning process, the results of which will help shape the agency’s near-term and long-term MTW goals and objectives. The strategic planning process engaged over 650 participants including HABC residents, staff and Board members, City departments, nonprofits and other community stakeholders in an intensive dialogue about how best to respond to the challenges and opportunities facing HABC and Baltimore City. These challenges are well documented in previous MTW Plans published by HABC and include ongoing reductions in federal capital and operating revenue, significant deferred capital needs for an aging portfolio, and growing community demand for affordable housing options.

The resultant “Pathways to Success” plan identifies a comprehensive 10-year framework including priorities, strategies and an action plan designed to support HABC’s mission to create and provide quality affordable housing opportunities in sustainable neighborhoods, while improving customer service and streamlining and improving agency operations.

Underpinning the strategic plan are four broad organizational goals established by HABC’s Executive Director, Janet Abrahams at the start of her tenure in July 2017:

Community – Improve the housing and quality of life for the people HABC serves.

Customer Service – Increase efficiency, responsiveness and accountability in the services HABC provides to internal and external clients.

Collaboration – Build upon HABC’s commitment to strong partnerships with residents, employees, government, nonprofit and business communities.

Communication – Create clear and consistent communication.

The plan is organized into three strategic priority areas:

Transform – HABC will transform the way it does business to proactively plan for a sustainable future for the affordable housing it provides. This encompasses a variety of strategies that will increase efficiency, diversify business operations, leverage HABC’s existing assets and tools, expand housing choice, and build capacity to provide good internal and external customer service. HABC will also actively seek out opportunities to leverage development at HABC sites as a tool for catalyzing neighborhood revitalization that stabilizes communities and maintains and grows the supply of affordable housing.

Innovate – HABC will innovate the way it connects residents to housing and supportive services by consolidating services and partnerships to ensure success. These innovative strategies will create ladders of opportunity to help HABC residents succeed through increased housing options, counseling, and service connections. HABC will create and leverage partnerships with external partners who align with HABC’s core mission and values, including the city of Baltimore, State of Maryland, philanthropic entities, and advocacy groups.

Advocate – HABC will continue to advocate for long-term sustainability and redevelopment of public housing to successfully provide affordable housing opportunities over time. These advocacy strategies will seek out federal, state, and local policy changes that will ensure sustainability for HABC operations, supportive services for residents, and increase affordable housing options. Dedicated funding of supportive services, investment in strategic neighborhoods, and the recruitment of networks of “champions” to support affordable housing and community development activities in Baltimore will form the base of HABC’s advocacy strategies.

The strategic priority areas encompass a series of 13 broad objectives and 60 strategies to be implemented over a 10-year period beginning in 2019. Priorities, objectives and strategies are reflected in the FY 2020 MTW Annual Plan and will help guide future MTW planning and implementation efforts.

Beginning in 2020, HABC also plans to develop and implement an agency-wide emergency preparedness plan that will provide a structured framework for HABC actions in the event of a natural disaster or other emergency. The goal of this effort is to ensure that HABC is ready for future emergencies and that plans are in place to ensure the health and safety of residents and staff. It will identify roles and responsibilities, training activities, contingency plans and strategies to mitigate, respond to and recover from emergencies.

C. MTW Goals and Objectives for Fiscal Year 2020

In support of the Pathways to Success plan, HABC's major goals and objectives for FY 2020 include the following activities, all of which utilize MTW Block Grant and/or programmatic flexibility:

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

Voucher Utilization – HABC projects that, on average, it will have 18,626 units under lease each month, including Thompson and all other programs.

Project-Based Voucher Utilization – HABC projects that 2,239 housing units will be under contract in the Project-Based Voucher (PBV) program by the end of FY 2020, including 50 units at one new development that will be placed under contract during the fiscal year, and thirty units in high opportunity areas as stipulated under the Thompson Settlement Agreement.

Capital Program – HABC will implement capital improvements at existing housing developments and scattered sites using MTW Block Grant funds (see Table 5). In FY 2020, HABC projects that it will expend approximately \$44.2 million on capital projects.

Development Program – HABC will undertake development activities designed to support the revitalization of Baltimore neighborhoods and replace distressed and obsolete public housing developments, including the completed renovation of Hollander Ridge properties by the close of FY 2020.

Rental Assistance Demonstration Program (RAD) – Conversion through RAD generates new capital resources, preserves existing affordable housing resources, ensures long-term affordability and improves the quality of life for residents. By end of FY 2019, HABC will have closed on 23 RAD developments, consisting of 3,745 units, representing a total investment of \$745 million, including private equity and other new funds through the Low-Income Housing Tax Credit (LIHTC) program. While each converted development has a new ownership structure including a new management and maintenance team, HABC will continue to have an ownership role (through its affiliates) and ongoing roles related to admissions, transfers and compliance monitoring. In FY 2020 HABC will continue the conversion process. Finally, HABC, subject to approval by the Board of Commissioners, may elect to apply to HUD for RAD conversion commitments at additional public housing sites. HABC will consult with local and citywide resident organizations prior to submission of future RAD applications.

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

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

Proposed MTW Activities – HABC is proposing four new MTW activities in FY 2020 – (1) Housing Quality Standards Modifications (HQS) and Enhancements; (2) Healthy Opportunities Program (HOP); (3) Local Forms; and (4) Modified Rent Reasonableness (RR) Policy. Under the HQS Modifications and Enhancements activity, HABC looks to reduce the number of reinspections by providing owners with checklists prior to initial inspections and charging fees for certain reinspections. The HOP program targets mobility assistance to families where moves may help to improve their outcomes related to health. The Local Forms activity will enhance administrative efficiency in that HABC forms will directly reflect MTW policies and requirements as opposed to using HUD versions of the same forms. Under the Modified RR activity, HABC will commission a market study to determine submarkets in Baltimore City and related rent ranges for these submarkets. The result will be a streamlined approach to RR determinations and greater accuracy in determining comparable rents.

Family Self-Sufficiency (FSS) Program Enhancements – In FY 2020, HABC will provide further enhancements to its FSS program. Specifically, HABC will develop and implement a system of financial incentives for completing interim goals. For example, HABC will provide a \$500 cash incentive for completing a vocational certification. These incentives are anticipated to encourage enrollment and maintain participation in FSS.

MTW Homeownership Program – In FY 2020, HABC will reactivate its MTW Homeownership Program. As part of the MTW Homeownership program, HABC will provide a five-year extension to the homeownership term to ease the transition from subsidized homeownership assistance. In each of the five years, the family will pay a gradually increasing percent of their mortgage payment; and HABC will provide a gradually decreasing subsidy.

Homelessness Prevention Initiatives – The Housing First Homeless Initiative does not require MTW Authority as HABC provides up to 850 Housing Choice Vouchers to eligible chronically homeless households referred by the Mayor’s Office of Human Services, Homeless Services Program (MOHS/HSP). Participants use their vouchers to find affordable permanent housing while receiving supportive services from MOHS and other agencies.

The Homeless and Veterans Set Asides – HABC has awarded 192 vouchers for Project-Based units designated to house the homeless. These vouchers are included in the 850 vouchers that have been set aside for the Housing First initiative. Additionally, HABC has awarded 182 vouchers for Project-Based units designated to house homeless veterans and their families.

The Re-Entry Program – This program links permanent housing with supportive services to assist up to 250 homeless individuals and families with an ex-offender household member. Referrals are made to HABC by the Mayor’s Office of Human Services, Homeless Services Program (MOHS/HSP). MTW Authority is not required for this initiative.

Analysis of Impediments to Fair Housing – HABC is participating in a Baltimore regional analysis of impediments to fair housing (AI) as evidenced by a Memorandum of Understanding (MOU) to develop a 2019 Regional AI that became effective on June 27, 2018. The Regional AI is being coordinated by the Baltimore Metropolitan Council. Root Policy, a consultant based in Denver, Colorado, was hired to assist with conducting and preparing the AI and the actions steps that result from the AI. In addition to representatives of the participating jurisdictions and PHAs, the work group consists of representatives of organizations that work on behalf of protected classes, advocacy agencies, the housing industry, community leaders and Maryland State agencies. There have been eight work group meetings where data on racially/economically concentrated areas of poverty, disparities on access to opportunity (employment, transportation, education and community health), disability and access, disproportionate housing needs, community reinvestment, publicly supported housing, and fair housing enforcement have been reviewed and discussed. The participating jurisdictions and PHAs are now discussing solutions and action steps with input from the work group.

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

Notes on Thompson and Bailey Settlements

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

1. Class action *Thompson v. HUD*, filed against HABC, the City of Baltimore and HUD resulting in the following provisions:

- 2,600 additional Housing Choice Vouchers from 2012 through 2018 ("Thompson Remedial Vouchers");
- Continuation of the 1,788 Housing Choice Vouchers already utilized under the Thompson Partial Consent Decree ("Thompson PCD-Leased Vouchers"); and
- The continuation of the Thompson Homeownership Voucher Program.

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

2. The *Bailey Consent Decree* required the creation of the following:

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

II. General Housing Authority Operating Information

A. Housing Stock Information

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

i. Planned New Public Housing Units

HABC will acquire and rehabilitate 10 one-bedroom units as new public housing units. These scattered site units are planned for occupancy in FY 2020.

Table 1: Planned New Public Housing Units in FY 2020

AMP Name and Number	Bedroom Size						Total Units	Population Type*	# of UFAS Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
Scattered Sites**	10						10	NEDS	1	
Total Public Housing Units to be Added in the Plan Year							10			

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

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

If “Population Type is “Other” please describe:

N/A

ii. Planned Public Housing Units to Be Removed

As shown on Table 2, HABC plans to demolish and/or dispose of 655 units in FY 2020. 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.

Table 2: Planned Public Housing to Be Removed in FY 2020

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/Various Scattered Sites Units	164	In the FY 2019 Annual Plan, HABC reported that 433 Scattered Sites units would be disposed of because they were obsolete, non-viable scattered site units. Please be advised that HABC has decreased this number to 164.
MD002/0103 Midtown Scattered Sites	7	In the FY 2019 Annual Plan, HABC reported that 23 of these units will be disposed of because they were obsolete and non-viable Please be advised that HABC has decreased this number to 7.
MD002/0108 Upton Scattered Sites	12	In the FY 2019 Annual Plan, HABC reported that 23 of these units will be disposed of because they were obsolete and non-viable. Please be advised that HABC has decreased this number to 12.
MD002/0109 Stricker Scattered Sites	5	In the FY 2019 Annual Plan, HABC reported that 21 of these units will be disposed of because they were obsolete and non-viable. Please be advised that HABC has decreased this number to 5.
MD002/0006 Gilmor Homes	132	HABC received approval to demolish 132 of the 548 units at Gilmor Homes. Demolition is expected to begin in the 4 th quarter of 2019 and to be completed by the end of 2020.
MD002/0009 O'Donnell Heights	-	HABC will submit a disposition application to HUD in FY 2020 for the disposition of 6 single-family lots for the developer to build for-sale housing units as part of Phase 1 redevelopment. Planning for redevelopment of Phase 2, consisting of 27 vacant acres is

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		underway and a disposition application will also be submitted in FY 2020.
MD/002/0010 Somerset Homes	-	HUD has approved the disposition of the 8.64 acres of vacant land located at the site formerly known as Somerset Homes.
MD002/003 Perkins RAD/CNI	275	The redevelopment of Perkins as part of the Perkins Somerset Oldtown Transformation Plan and HUD Choice Neighborhoods award. The disposition application will be submitted to HUD in FY 2019, and the demolition of 275 units will occur in FY 2020.
Somerset Extension	60	Planned RAD conversion.
TOTAL NUMBER OF UNITS	655	

iii. **Planned New Project-Based Vouchers**

HABC plans to enter into a Housing Assistance Payment (HAP) Contract for 80 new project-based units in FY 2020, as shown in Table 3. HABC does not anticipate any RAD PBV conversions in 2020. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the HABC Board during the Plan Year, HUD RAD processing timetables and other considerations.

Table 3: Planned New Project-Based Vouchers

Property Name	Number of Vouchers to be Project-Based	RAD?	Description of Project
1234 McElderry Street (Somerset Phase I)	50	No	New construction of 50 units to be project-based and located in the Somerset/Old-town neighborhood areas of Baltimore City.
Scattered Sites	20	No	Scattered site units in high-opportunity areas throughout the region.

Red Maple Place	10	No	New construction of 56 units in Towson, 10 of which will have BRHP project-based units.
Total Planned New Project-Based Vouchers	80		

iv. Planned Existing Project-Based Vouchers

HABC will continue to provide voucher-based operating support for a large portfolio of existing units under contract in the PBV program or units for which an Agreement to Enter into Housing Assistance Payments (AHAP) Contract is in place. Table 4 provides details on those PBV developments that are currently under contract, and projects which HABC anticipates will be under contract throughout FY 2020. As noted, there are 2,193 units in this category. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the HABC Board during the Plan year, HUD RAD processing timetables and other considerations.

Table 4: Planned Existing Project-Based Vouchers

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2020	RAD?	Description of Project
18 W. Read St., Inc.	10	Leased/Issued	No	10 1bd NED units at 18 W. Read St.
214 E. Biddle St.	5	Leased/Issued	No	5 1bd NED units at 214 E. Biddle St.
2301 N. Charles St., Inc.	7	Leased/Issued	No	2 efficiencies and 5 1bd NED/UFAS units at 2301 N. Charles St.
Alcott Place	28	Leased/Issued	No	28 1bd units at 2702 Keyworth Ave.
Artaban Ashburton Apartments	14	Leased/Issued	No	14 1bd NED units at 5906 Park Heights Ave.
Ashland Commons	12	Leased/Issued	No	12 1bd (8-NED) units at 1715 E Eager St.
Barclay	19	Leased/Issued	No	1 1bd, 1 2bd, and 17 3bd (1-NED, 4-UFAS) units at 2106-2234 Barclay St.
Barclay II (North Barclay Green)	15	Leased/Issued	No	11 1bd NED and 4 2bd UFAS units at 341 E. 20 th St.
Barrister Court	8	Leased/Issued	No	2 efficiencies, 5 1bd, and 1 2bd UFAS unit at 1300 Washington Blvd.
Belvieu Gardens	10	Leased/Issued	No	10 1bd NED units at 3915-3921 Belvieu Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2020	RAD?	Description of Project
Bellevue Manchester	8	Leased/Issued	No	8 1bd units at 342 Bloom St.
Bennett House	25	Leased/Issued	No	24 SROs and 1 1bd unit at 14 E Franklin St. designated to provide supportive services to low-income residents
Bon Secours – Gibbons	20	Leased/Issued	No	12 1bd NEDs, 4 2bd and 4 3bd UFAS units at 900 Desoto Rd.
Bon Secours – New Shiloh	19	Leased/Issued	No	16 1bd (11-NED), 2 2bd and 1 3bd units at 1930 Windsor Ave. (8-PB Homeless)
Brexton Chase	7	Leased/Issued	No	7 1bd NED units at 241 W. Chase St.
Brick by Brick	2	Leased/Issued	No	2 1bd NED units at 903 Gorsuch Ave.
Butchers Row	9	Leased/Issued	No	3 1bd, 2 2bd, and 4 3bd units at E. Baltimore St.
Calvert Street Properties	18	Leased/Issued	No	18 1bd NED units at 1625 N. Calvert St.
Calverton House	14	Leased/Issued	No	13 SROs and 1 efficiency at 119 E. 25 th St.
Chapel Green	20	Leased/Issued	No	8 1bd NED units and 12 3bd (4-UFAS) units at Chase, Wolfe, and Washington Streets
Cherry Hill Senior Housing	50	Leased/Issued	No	48 1bd NED units and 2 2bd UFAS units at 901 Cherry Hill Rd.
Cherrydale	32	Leased/Issued	No	32 1bd NED units at 1118 Cherry Hill Rd.
City Arts	11	Leased/Issued	No	11 1bd NED units at 440 E. Oliver St.
City Arts II	15	Leased/Issued	No	12 1bd NED and 3 2bd UFAS units at 1700 Greenmount Ave.
Clare Court Apartments	15	Leased/Issued	No	5 1bd, 7 2bd and 3 4bd (7-NED, and 3-UFAS) units at 3725 Ellerslie Ave.
Clarks Lane	6	Leased/Issued	No	6 1bd NED units at 3901 Clarks Ln.
Clarksvew, LLC	8	Leased/Issued	No	8 1bd NED units at 3701-3711 Clarks Ln.
Coel-Grant Higgs	57	Leased/Issued	No	32 efficiencies and 25 1bd (6-UFAS) units at 1700 N Gay St.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2020	RAD?	Description of Project
Coleman Manor	49	Leased/Issued	No	49 1bd (8-NED, 5-UFAS) units at Walbrook Ave.
Columbus School Apts.	8	Leased/Issued	No	8 1bd units at 2000 E North Ave
Community Housing	5	Leased/Issued	No	1 efficiency, 1 1bd, 1 2bd, and 2 3bd (all NED) scattered site units
Dayspring	18	Leased/Issued	No	17 2bd and 1 3bd transitional units at 1125 Patterson Park
DiMaggio Scattered Sites	23	Leased/Issued	No	8 2bd, 10 3bd, 4 4bd, and 1 5bd units designated for chronically homeless households at scattered sites
Dominion Properties	7	Leased/Issued	No	3 1bd NED units and 4 3bd units at 1617 Dukeland Ave., 6 th St., Hilton and Monument Streets
Dorchester Apts.	10	Leased/Issued	No	10 1bd NED units at 4300 Liberty Heights Ave.
Druid Hill LTD	12	Leased/Issued	No	10 2 bd and 2 3bd units at 1621 Druid Hill Ave.
Druid House	19	Leased/Issued	No	8 2bd and 11 3bd units at McCulloh St.
Epiphany House	33	Leased/Issued	No	33 efficiencies at 5610 York Rd.
Fallstaff Apts.	4	Leased/Issued	No	2 1bd NED units, 1 2bd and 1 3bd (1-UFAS) units at 3800-3810 Fallstaff Rd.
Fells Point Station	14	Leased/Issued	No	11 1bd and 3 2bd (6-NED, 8-UFAS) units at 1621 Bank St.
Franklin Flats	7	Leased/Issued	No	7 1bd NED units at 20 E. Franklin St.
Greenmount & Chase	19	Committed	No	New Construction of 60 units located in the Johnston Square neighborhood at Greenmount Ave., Chase and Proctor Streets, of which 19 will be project based
Greens at Irvington Mews	20	Leased/Issued	No	20 1bd NED units at 4300 Frederick Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2020	RAD?	Description of Project
Harry & Jeannette Weinberg Place	88	Leased/Issued	No	85 efficiencies and 3 1bd units at 2500 W. Belvedere Ave.
Holden Hall	14	Leased/Issued	No	14 SRO units at 761 W. Hamburg St.
Indecco	9	Leased/Issued	No	2 efficiencies and 7 1bd units at 940 S. Lakewood Ave.
Independence Place	21	Leased/Issued	No	11 1bd and 10 2bd units designated for chronically homeless households at 4101½ Old York Rd.
Irvington Woods	57	Leased/Issued	No	11 1bd NED and 46 2bd units at 4102-4126 Potter St.
JByrd	3	Leased/Issued	No	3 1bd NED units at Windsor Mill Rd.
Jenkins House	22	Leased/Issued	No	20 SRO and 2 1bd units at 2226 Maryland Ave.
John Manley House	5	Leased/Issued	No	5 1bd NED units at 5304 Harford Rd.
Keys Pointe – Phase 1B	34	Leased/Issued	No	19 1bd, 8 2bd, 4 3bd and 3 4bd (11-NED, 4-UFAS) units at Cardiff, Jarmon, Hornell, Boston and Gallop Streets
Lillian Jones Apts.	22	Leased/Issued	No	14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303 Greenmount Ave.
M on Madison	23	Leased/Issued	No	23 1bd NED units at 301 W. Madison St.
Marian House	8	Leased/Issued	No	4 SRO and 4 3bd units at 949 Gorsuch Ave.
Marian House II	5	Leased/Issued	No	5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave.
Mary Harvin Center	8	Leased/Issued	No	8 1bd units at 1600 N. Chester St.
Metro Heights at Mondawmin	18	Leased/Issued	No	13 1 bd, 2 2bd and 3 3 bd (10-NED, 1-UFAS) units, some designated for chronically homeless households at 2700 Reisterstown Rd.
Milford Station	6	Leased/Issued	No	6 1bd NED units at 3900 W. Northern Pkwy.
Moravia	60	Leased/Issued	No	57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2020	RAD?	Description of Project
Mount Royal Apts.	5	Leased/Issued	No	5 1bd units at 1512 W. Mt. Royal Ave.
Mulberry at Park Apts.	19	Leased/Issued	No	11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St.
Newington	6	Leased/Issued	No	3 2bd and 3 3bd units at scattered sites
North Barclay Green III	12	Leased/Issued	No	9 1bd units and 3 3bd UFAS units at E. 21 st St. and Greenmount Ave.
North Avenue Gateway	16	Leased/Issued	No	11 1bd NED units and 5 2bd units at 3001-3003 W. North Ave.
North Avenue Gateway II	16	Leased/Issued	No	10 1 bd NED units and 5 2bd units at 3001-3003 W. North Ave.
Oaks at Liberty	45	Leased/Issued	No	45 1bd units at 3501 Howard Park Ave.
O'Donnell Heights	42	Leased/Issued	No	16 1bd (12-NED) units, 12 2bd units, 13 3bd units, and 1 4bd unit (4-UFAS)
Orchard Ridge I-V	197	Leased/Issued	No	119 1bd units, 42 2bd units, 32 3bd units, 3 4bd units and 1 5bd unit (52-NED, 27-UFAS) at Orchard Ridge Blvd., Green Rose and Maple Shade Dr.
Paca House	30	Leased/Issued	No	30 efficiencies at 116 N. Paca St.
Parktown-Cason Arms	12	Leased/Issued	No	8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave.
Penn North	15	Leased/Issued	No	14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave.
Penn Square II	15	Leased/Issued	No	12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave.
Parkwood	3	Leased/Issued	No	3 1bd NED units at scattered sites
Poppleton II	15	Leased/Issued	No	11 1bd NED units and 4 3bd UFAS units at 838 W. Fairmount Ave.
Poppleton III	10	Leased/Issued	No	7 1bd NED units, 1 2bd UFAS and 2 3bd UFAS units at 866 W. Fayette St.
Pratt Street	35	Leased/Issued	No	27 2bd and 8 3bd units at 1700 W Pratt St. – transitional housing

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2020	RAD?	Description of Project
Restoration Gardens	43	Leased/Issued	No	40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave.
Restoration Gardens II	42	Leased/Issued	No	42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd.
Seminole Apartments	6	Leased/Issued	No	6 1bd NED units at 4300 Seminole Ct.
Sharon Towers	10	Leased/Issued	No	10 2bd units at 4-6 N. Carey St.
Sharp Leadenhall	4	Leased/Issued	No	4 1bd units (3-UFAS) at Race and West Streets
Sojourner at Argyle Apartments	12	Leased/Issued	No	12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St.
St. Stephens	15	Leased/Issued	No	15 1bd NED units at 3900 Roland Ave.
St. Vincent DePaul	9	Leased/Issued	No	8 2bd and 1 3bd units at Ulman Ave.
St. Vincent DePaul	5	Leased/Issued	No	1 3bd and 4 4bd units designated for chronically homeless households at Bond St. and Cottage Ave.
Symphony Home at Purdue	6	Leased/Issued	No	6 1bd units at 5683 Purdue Ave.
Union Ave. – Buena Vista Apartments	48	Leased/Issued	Yes	15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave.
Uplands	62	Leased/Issued	No	24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln.
Wayland Village	45	Leased/Issued	No	45 1bd (14-NED) units at 3020 Garrison Blvd.
Weinberg Family Center – 1209 Rose	8	Leased/Issued	No	5 2bd and 3 3bd units designated for chronically homeless households at 1209 N. Rose St.
Weinberg Family Center – Guadenzia at Park Heights	18	Leased/Issued	No	14 2bd and 4 3bd units designated for chronically homeless households at 4613 Park Heights Ave

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2020	RAD?	Description of Project
Weinberg Manor East	75	Leased/Issued	No	10 SRO, 41 efficiencies, and 24 1bd units (10-NED, 5-UFAS) at 3601 Fords Ln.
Weinberg Manor South	14	Leased/Issued	No	14 1bd NED units at 3617 Fords Ln.
Westminster House	163	Leased/Issued	No	103 efficiencies, 55 1bd, and 5 2bd units at 524 N. Charles St.
Total	2,193			

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

In FY 2020, HABC will complete an asset review of the Scattered Sites inventory. The review will have a five-pronged approach to provide a roadmap and framework for demolition and/or disposition of obsolete units as well as the preservation of existing units.

In FY 2019, HABC completed an assessment of the Scattered Sites inventory prior to establishing the five-pronged strategy. As a result of this assessment, each property was assigned a grade that allows HABC to determine the feasibility of keeping the unit based on neighborhood conditions, HABC’s fiscal restraints and any over-arching plans that the City of Baltimore may have for investment or blight elimination. Since the completion of the evaluation, HABC began to review each property for one of the following five designations:

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

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

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

[Baltimore Affordable Housing Development, Inc. \(BAHD\)](#) – On May 28, 2014, HABC created BAHD to facilitate development activities, including the development projects approved by HUD for Housing Authority of Baltimore City | FY 2020 MTW Annual Plan

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

Properties for Auction – HABC will consider holding an auction for buildings that are obsolete, too expensive to renovate or are in non-viable neighborhoods when no other strategy is available to keep them.

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

HABC will implement a wide range of capital investments at existing public housing sites and continue its program of citywide housing development activities as summarized on Table 5. Additional discussion of capital plan, energy, infrastructure and extraordinary maintenance issues and initiatives is included below. As summarized in Table 5, HABC projects it will expend a total of approximately \$44.2 million on capital-related activities in FY 2020. 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 2020 Planned Expenditures
1.	Latrobe Homes	Water intrusion repairs, site improvement, underground heating piping repairs, upgrade lighting in crawl spaces, sump pumps (high temperature), heating loop pumps	\$1,518,000
2.	McCulloh Homes	Upgrade lighting in crawl spaces (low rise), windows, Install interior LED lighting, natural gas piping systems and pipe hangers	\$1,533,326
3.	Perkins Homes	Emergency repairs, CNI projects, relocation	\$3,166,793
4.	Poe Homes	Steam system and HWG stabilization, unit improvements	\$800,000
5.	Douglass Homes	Window and security screens, cameras	\$3,198,599

No.	Development Name	Description of Work	FY 2020 Planned Expenditures
		and lighting, playground, domestic hot water generators, upgrade lighting in crawl spaces (low rise)	
6.	Gilmor Homes	Windows, painting and caulking, boilers and steam distribution system, replacement of 4 UFAS units, EMCS add community building, window replacement, domestic hot water generators, lighting program, demolition of 132 walk-up units, exterior electrical cabinets	\$9,657,804
7.	O'Donnell Heights	Emergency repairs (windows, heating, site work, paving, etc.)	\$100,000
8.	Cherry Hill	Replace/install HVAC 2-17, upgrade electrical cabinets on exterior building, site work	\$1,635,000
9.	Brooklyn Homes	Repairs to HABC-owned alleys, roads and sidewalks (site work), additional cameras, Kaboom site prep for playground	\$625,000
10.	Westport	Daycare building demolition	\$300,000
11.	Rosemont Family	Natural gas piping systems	\$888,980
12.	Uptown Apartments	Replace roof	\$104,000
13.	Scattered Sites	Renovate long-term vacant units, window replacement, roofing replacement, basement waterproofing, limited lead-free painting, gas water heater replacement	\$3,276,573
14.	Authority-Wide	Non-dwelling Structures, management and maintenance facilities, site improvement, kitchen, cabinets and countertops, bathrooms cabinets and sinks, windows, electrical work, mechanical work, vacancy renovation, playground, relocation activities	\$1,733,003
15.	AHI	Affordable homeownership (BRHP)	\$2,974,344
16.	Douglass, Poe, Dukeland, Rosemont, Oswego, McCulloh (low rise), McCulloh Townhomes, Laurens,	Emergency contingency funds	\$216,938

No.	Development Name	Description of Work	FY 2020 Planned Expenditures
	Mt. Winans, Spencer Gardens, Carey House		
17.	Arbor Oaks, Townes at the Terraces	RAD Subsidy	\$350,839
18.	Latrobe, Poe Homes, Gilmor Homes, Cherry Hill Homes, Brooklyn Homes, Westport/ Mt. Winans	Sub metering maintenance and service	\$30,000
19.	Authority-Wide	A&E Environmental consulting fees	\$1,156,154
20.	Authority-Wide	Legal, planning, information technology and utility consulting fees, etc.	\$1,257,500
21.	Central Office	Technical salaries and benefits	\$1,236,922
22.	Central Office	Non-technical salaries and benefits	\$2,881,181
23.	Central Office	Resident meetings and training	\$9,600
24.	Central Office	Admin and operating costs, overhead, sundry and audit fees	\$1,079,044
25.	Central Office	Debt service – 1 st Phase EPC	\$3,783,477
GRAND TOTAL			\$42,213,077

504 Accessibility Improvements

In FY 2020, HABC will continue to: (i) maintain existing UFAS units, common areas and accessible routes to ensure continued compliance with UFAS and the 2010 ADA standards; and (ii) modify units to meet reasonable accommodation and immediate need requests.

As of December 31, 2018, 758 units that meet the UFAS requirements for wheelchair accessibility had been created and certified under the Bailey Consent Decree. However, the number of one-bedroom and two-bedroom UFAS units exceeds the number required by the Bailey Decree, as amended and there is a shortage of five three-bedroom UFAS units. HABC plans to create these UFAS units through Baltimore City LIHTC projects and these UFAS units will exceed the 5% UFAS unit requirement for each LIHTC project.

An additional four three-bedroom UFAS units will also need to be created due to HABC's plan for the demolition of 132 of the 548 units at Gilmor Homes. HABC is doing preliminary planning and, through this process, will determine where the additional four three-bedroom UFAS units will be located. HABC may use capital funds to create these UFAS units.

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

Infrastructure and Extraordinary Maintenance

In FY 2020, HABC may: (i) continue to develop master plans which note physical areas of concern and a course of action to rectify them (landscaping, egress, hazards, etc.); (ii) perform major renovations at various developments and a portion of the scattered site inventory to further reduce vacancies; and (iii) repair/replace 504 ramps. In addition, in FY 2020 HABC may continue to: (i) study the conditions of its scattered sites portfolio to determine long-term planning goals; (ii) investigate and repair drainage and erosion problems at various sites; (iii) address trip hazards; and (iv) implement its environmental program that includes the continued testing for lead based paint and abatement of asbestos as required.

HABC will continue its program of capital improvements using a prioritized needs list based upon available funding. Major initiatives planned in FY 2019 to be completed in FY 2020 are the demolition/deconstruction of six apartment style walk-up buildings (132 units) and subsequent re-routing of utilities serving Gilmore Homes with the possible assistance of state demolition grant funding; and playground replacement and refurbishment through HABC's partnership with KABOOM playground specialists.

Additionally, major project work underway to be completed in FY 2020 includes window replacement at Gilmore Homes; the replacement of roofs at various scattered sites; and the continuation of lease hold improvements at the Benton Building and at 709 E. Eager St. (including designing and constructing a parking lot for employees and program participants) due to staffing and reorganization efforts.

Major work in FY 2020 may include renovations at Poe Homes, Latrobe, McCulloh, Douglas, Gilmore, Cherry Hill, Westport, Brooklyn and various scattered sites. Other related work to be completed will be painting, interior units, construction and finishes as well as kitchen and bathroom upgrades at these HABC family and targeted scattered sites. Windows are an ongoing capital constraint for the Agency. However, HABC plans the replacement of windows and re-caulking of windows at developments as well as some security screens for windows as identified. HABC has planned for some emergency work as needed at both Perkins Homes and O'Donnell Heights. There will also be a focus on basement water proofing in various scattered sites units as

needed. As part of the Green Physical Needs Assessments, HABC has completed a needs assessment for the scattered site inventory. HABC will assess the viability of each unit based on condition, neighborhood, typology and redevelopment opportunities, including affordable homeownership, RAD, mixed financed, etc. Decisions will be made to keep the units in HABC's inventory or dispose of them for one of the opportunities previously mentioned.

In general, HABC will conduct environmental, electrical, mechanical and architectural studies for aged infrastructure and developments. In FY 2020, HABC will plan for agency-wide electrical studies for electrical systems at various developments and especially the overhead electrical distribution system. Those studies could result in various levels of electrical system work depending on the extent of the work and available funding. As a practical matter and one of safety, the crawl space lighting will be upgraded at all of the applicable sites. Outdated and failing outdoor electrical cabinets outside of the buildings at various developments will be replaced to maintain safe and secure housing for the electrical system.

HABC will assess foundation construction to address water infiltration, flooding and run off at various developments as needed such as Brooklyn Homes, Latrobe Homes, McCulloh Homes, Poe Homes, Douglass Homes, Gilmore Homes, Cherry Hill Homes and Westport Homes. The agency will address the replacement of water, sewer and sanitary lines at any developments as the need is identified. Site improvements will be made as necessary and to the extent allowed by available funding. Repairs to the HABC owned alleys, roads and sidewalk at Brooklyn Homes will be prioritized to be completed in FY 2020.

Ongoing major system needs are distribution piping systems, along with boiler room upgrades and heating/energy management systems assessment/replacement at all sites. Heating systems at family developments are undergoing boiler room and heating/hot water distribution system overhauls and/or efficiency upgrades as needed. This will also include replacement and/or upgrades to the Energy Management Control System (EMCS) at various developments. Underground heating piping repairs began in FY 2019 and will be completed in FY 2020. Heating loop pumps and high temperature sump pumps will be installed where necessary to reinforce the heating system and protect the heating equipment. Poe Homes was added back to HABC's management. Steam heating and hot water system and boilers will be assessed and overhauled as needed. The domestic hot water generators will be upgraded at Douglass Homes

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

as needed. HABC will continue its testing for lead based paint, the abatement of asbestos as required and will continue to respond to all other environmental concerns.

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

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

HABC received HUD approval to demolish 132 “walk-up” units at Gilmor Homes. The portion of the site proposed for demolition is the location of a significant amount of criminal and drug activity. Steps taken to curtail this activity, which include replacing lights, replacing locks, installing secure doors and the strategic use of cameras, have not been successful.

The estimated cost of required improvements in the walk-up units is \$17 million. The \$17 million represents replacing existing equipment in kind and does not fully address upgrades, redesign and modernization, especially as it relates to security enhancements. The removal of these buildings will open up the site and make it difficult to conceal illegal activity.

HABC’s Capital Fund is totally inadequate to address the unmet and accrued needs of its inventory at Gilmor Homes and elsewhere. HABC receives approximately \$1,300 per unit annually to address capital needs in properties that were built in the 1940s with failing infrastructures. HUD approved the disposition application in FY 2018 for the partial demolition of 132 units in Gilmor Homes’ walk-up buildings. Actual demolition will start in FY 2019 and continue through FY 2020. The application includes plans to re-route the existing utilities to maintain service to the surrounding buildings remaining on the property as well as plans to relocate and demolish the six walk-up style apartment buildings. Four of the units to be removed are UFAS units and will be replaced at a suitable alternative location. The estimated cost to reroute and demolish the buildings is \$4.4 million, and the work will take 12 to 15 months. The expected timing for the issuance of the notice to proceed is in the fourth quarter of FY 2019.

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

HABC will continue monitoring, measurement and verification efforts for the Phase I Energy Performance Contracting (EPC) properties (Latrobe, Cherry Hill, Gilmor, Westport and Brooklyn). A second EPC Program of approximately \$10.1 million is underway for the installation of conservation measures including lighting, water conservation fixtures, utility metering and system upgrades at selected properties (Douglass Homes, Poe Homes, Dukeland Homes, Rosemont Homes, Oswego Mall, McCulloh Homes Low Rise, McCulloh Homes Townhomes (122), Laurens House, Mt. Winans, Spencer Gardens, and Carey House). The second EPC is planned for a total of 15 years, inclusive of two years of construction and ECM installation. Design,

construction and ECM installation began in the second quarter of FY 2019. Pursuant to the EPC strategic plan, HABC re-negotiated Veolia steam contracts for service to Douglass Homes and Cherry Hill Homes. As part of the EPC II, there will be a completely new gas distribution to Rosemont Homes and upgrades to parts of the McCulloh gas distribution system.

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

The Energy Department addresses and manages the Resident Billing & Metering Program. HABC contracted with a third-party utility billing company to handle resident excessive consumption charges in early FY 2018. The company will continue the efforts with the properties in the first EPC and absorb the Phase II EPC properties once the sub-metering infrastructure is in place. HABC's Energy Department will oversee this company in close collaboration with other Agency departments. Additionally, the Energy Department will ensure all Utility Allowances & Excessive Consumption Charges (ECC) updates are performed for the developments under the EPC program. Section 8 Utility Allowances will also be reviewed and updated. The Energy Department maintains meter service agreements with contractors to service the EPC sub meters.

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

Partnerships

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

Safety & Security Initiatives

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

HABC continues its partnership with MOCJ, MOIT and BPD-Homeland Security Division. Through this collaboration, HABC performs ongoing reviews for the useful life and operation of camera equipment and gunshot technology at Cherry Hill, Gilmor, Latrobe, McCulloh, Poe and Brooklyn Homes. Camera maintenance, safety and security concerns and safety grants are some of the work performed as a result of these partnerships. The maintenance agreement for 173 cameras was extended through June 2020. The agreement will also include Brooklyn Homes at the end of the warranty period.

This partnership also seeks opportunities to apply for private and governmental grants for the implementation of new cameras and security lighting at all sites. HABC applied for the Department of Housing Safety and Security Grant for McCulloh Homes. Pending an award, construction to install CCTV infrastructure and up to 10 cameras at McCulloh Homes will commence in FY 2020 and be completed in FY 2020 under this partnership. The grant will cover the installation of at least 10 cameras, security lighting and some fiber optic cable installation. The work includes installations to key areas around McCulloh Homes as part of the crime fighting and deterrent strategy. Fiber installations are being evaluated for possible implementation at all sites to increase data connectivity/reliability and camera operations. The Kaboom Douglass Homes playground installed in 2018 will undergo security lighting and camera installations to protect the playground installation. Brooklyn Homes will be evaluated for additional cameras to add to the site.

[Facilities & Real Estate](#)

HABC will assess and prepare to renovate key HABC Maintenance Facilities across the various developments. The renovation of the old daycare center at Latrobe Homes is planned as a maintenance staff work and storage space. There is ongoing management of leased space at Benton Building and the West Pratt Street or Mount Clare Junction facilities. HABC leases the space at Duncanwood and will oversee any major changes or upgrades to the archive system as well as a disaster recovery/emergency response system at this location. HABC is also reviewing the demolition of the old daycare building at Westport Homes and the viability of the community building at Brooklyn Homes.

Development Initiatives

HABC utilizes MTW Block Grant and other public and private leveraged funds to support the preservation and revitalization of existing public housing communities and the development of new affordable units. A summary of non-RAD activities and other major ongoing and planned

development initiatives follows. The discussion of planned unit counts, timetables, development financing and other details is preliminary and subject to change.

In addition to the projects noted below, HABC is also pursuing opportunities to preserve and develop affordable housing for low-income households, and as such, other development initiatives may occur in FY 2020.

[O'Donnell Heights](#)

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

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

Planning for Phase 2, consisting of 27 vacant acres, is underway and involves the completion of a revitalization plan for the Greater O'Donnell Heights area, which will be used to update the current master plan for the site. A disposition application for the Phase 2 site area will also be submitted to HUD in FY 2020.

[Bailey Supplemental Decree Units](#)

Ten additional units for non-elderly persons with a disability will be created through the acquisition and rehabilitation of units in neighborhoods identified in the Bailey Supplemental Decree. The acquisition of these properties will get underway in FY 2019 and be completed during the 1st half of FY 2020.

[Thompson Settlement Agreement](#)

Under the Thompson Settlement Agreement, the Baltimore Regional Housing Partnership (BRHP) is continuing the project-based development program that was started under the Thompson partial consent decree. BRHP is implementing a project-based development program to create project-based units in Communities of Opportunity. Subject to funding availability, BRHP is making pre-development funding and, if needed, subordinate secondary financing using the Urban Revitalization Demonstration Grant funds awarded for the Homeownership Demonstration Program (MD-06-URD-002-I294), available to pre-qualified developers and property owners who develop housing units and agree to enter into long term project-based voucher contracts. BRHP committed funding for 54 units in FY 2019. Under this initiative, BRHP's

goal is to create 30 new project-based units in Communities of Opportunities in FY 2020 twenty (20) of which will be located in scattered sites units in high-opportunity areas throughout the region and the remaining ten (10) units are planned as part of the new construction being built in Towson, Maryland called Red Maple Place. Red Maple Place will contain 56 units, 10 of which will have BRHP project-based units.

[Hollander Ridge HOPE VI Project](#)

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

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

HABC anticipates the mixed-finance closing to occur in September 2019 and rehab of Hollander Ridge properties to begin November of 2019. All units are expected to be completely renovated and leased up by December 31, 2020. HABC plans to convert the 94 Hollander Ridge units to project-based rental assistance under RAD in 2121.

[Perkins Somerset and Oldtown Transformation Plan](#)

HABC and the City of Baltimore were awarded a \$30 million Choice Neighborhoods (CN) grant in July 2018 to support the Perkins Somerset Oldtown (PSO) Transformation Plan. The PSO Transformation Plan includes the demolition of the existing 629 Perkins Homes public housing units and the creation of 1,345 units of mixed income housing on the Somerset and Perkins public housing footprint and the adjacent properties owned by the Mayor and City Council of Baltimore.

HABC received disposition approval for the vacant 8.64-acre Somerset site in September 2018 and will submit a disposition application to HUD for Perkins Homes in FY 2019. HABC received HUD approval in FY 2019 to convert all 629 public housing units at Perkins Homes under RAD in connection with a multi-phased replacement housing project.

At Perkins, HABC intends to replace all of the UFAS units that are certified under the Bailey Consent Decree. In addition, the developer will provide a minimum of 7% additional mobility

UFAS units pursuant to the Bailey Consent Decree and 2% hearing/vision UFAS units as per the PSO Choice award, as required by law.

The Somerset Homes site will be redeveloped in three phases and the overall Somerset development plan includes an additional phase to be completed off-site on an adjacent parcel owned by the Mayor and City Council of Baltimore that will be conveyed to HABC.

HABC will convey the Somerset Homes site in phases to a single purpose entity controlled by Somerset Redevelopment, LLC. A total of 493 rental units will be constructed on the Somerset Homes site, consisting of 239 deeply affordable units (PBV and RAD PBRA), 139 LIHTC units at 80% or less of Area Median Income and 115 market rate units. The off-site parcel will include an additional 64 mixed-income units, of which 18 are market rate units, 10 are LIHTC units and 36 RAD PBRA units. The redevelopment of Somerset Homes also includes the construction of a new community park and a network of new public streets resulting in a more pedestrian friendly walkable community. Construction of the 104-unit first phase will begin July 2019.

The Perkins site will be redeveloped in five phases. Demolition of the first 100 units at Perkins will begin January 2020 subject to demolition approval by HUD to be submitted to HUD during the last half of 2019. A total of 275 units are anticipated to be demolished in FY 2020.

[Poe Homes](#)

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

An RFP was issued for the Master Planning and Real Estate Development Services for the Co-Development, Ownership and Operations of New Mixed-Income Housing at the Poe Homes public housing site in March 2019. A developer was selected in May 2019. HABC will deliver an outline of the housing plan in September 2019 to HUD. The draft transformation plan to satisfy the Choice Neighborhoods Planning Grant will be submitted to HUD in March 2020.

B. Leasing Information

i. Planned Number of Households Served

Table 6 provides information on the MTW households projected to be served by HABC staff as of the end of FY 2020.

Table 6: Planned Number of Households Served at the End of FY 2020

Planned Number of Households Served Through:	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units	74,052	6,171
MTW Housing Choice Vouchers (HCV) Utilized*	160,860	13,405
MTW Thompson Housing Choice Vouchers**	52,530	4,378
Local, Non-Traditional: Tenant-Based	N/A	N/A
Local, Non-Traditional: Property-Based	N/A	N/A
Local, Non-Traditional: Homeownership	N/A	N/A
Planned Total Households Served	287,442	23,954

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

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

Table 6A: Local, Non-Traditional Housing Programs

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

Table 7 provides information on Non-MTW vouchers projected to be leased during FY 2020. This table is not a requirement of Attachment B to the Standard MTW Agreement.

Table 7: Planned Number of Non-MTW Households Served at the End of FY 2020

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to Be Served
NEDs II	456	38
VASH	6,180	515
FUP	1,164	97
Section 8 Mod/Rehab	2,316	193
Planned Total Number of Non-MTW Households Served	10,116	843

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

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

Table 8: Anticipated Issues and Possible Solutions Related to Leasing

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	<p>HABC has undertaken several initiatives to decrease applicants’ time on the waiting list and therefore lease families faster and more efficiently.</p> <p>In FY 2019, HABC began to update its public housing waiting list. During the 2nd quarter of 2019 HABC mailed out 24,000 letters to applicants on its waiting list and another 3,000 letters to applicants who were withdrawn from the waiting list during the last update in 2015. Of the 27,000 letters mailed, HABC has received 9,744 responses. HABC will undertake extraordinary efforts to contact the remaining 17,256 applicants who have not responded. After all efforts have been exhausted, HABC will begin removing applicants from the public housing waiting list on January 20, 2020.</p> <p>HABC is also working on an online Application Portal System that will eventually allow public housing applicants to apply for housing assistance online. Most families will be able to select up to three</p>

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
	<p>sites where they would like to live when applying online (this excludes all units covered by the Bailey Consent Decree).</p> <p>In addition to the efforts above, HABC has updated its Interactive Voice Response System (IVRS). Now, applicants who call HABC can not only find out the status of their public housing application, they will also be able to speak with a Case Manager if they have additional questions.</p> <p>Lastly, HABC signed a Memorandum of Understanding (MOU) with the Baltimore City Police Department. Under the MOU, HABC is able to obtain more police reports concerning criminal activity on public housing property. This may increase the number of evictions due to criminal activity and non-compliance with HABC’s Dwelling Lease.</p>
MTW Housing Choice Voucher	Under its ACC, HABC’s HCVP-MTW funding limits the number of households for which assistance can be made available to no more than approximately 13,800 (this funding limitation does not affect Thompson- MTW, HUD-VASH, New Construction or Moderate Rehabilitation vouchers). Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2020 is an additional contributing factor in determining projected utilization.

C. Waiting List Information

i. Waiting List Information Anticipated

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

Table 9: Waiting List Information Anticipated

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	23,361	Closed	No
Federal MTW Housing Choice	Site-Based	7,602	Closed	No

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
Voucher Units: Project-Based				
RAD Choice Mobility	Program Specific	413	Open	N/A
Federal MTW Public Housing Units	Community Wide	9,744*	Open	N/A
Thompson Vouchers **	Program Specific	13,815	Closed	No

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

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

Describe any duplication of applicants across waiting lists:

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

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

Waiting List Name	Description of Planned Changes to the Waiting List
Public Housing	<p>HABC plans to transition its PH waiting list to the following centrally managed waiting lists:</p> <ul style="list-style-type: none"> • Centrally Administered Location Based Waiting List: CALBWL. This waiting list includes all units/developments not covered under the Centrally Administered Mixed Population & Other Units Covered under Bailey (CAMPBWL) • Centrally Administered Mixed Population & Other Units Covered under Bailey: CAMPBWL. This waiting list includes the units at mixed population developments and other units covered under Bailey. • Centrally Administered First Available Waiting List: CAFAWL: Families who select the CAFAWL are listed on all the development waiting lists for which they are eligible, including those developments covered under the CALBWL and CAMPBWL. <p>The CALBWL will not include developments covered under the CAMPBWL. A single waiting list will serve all developments covered by the CAMPBWL.</p>

Waiting List Name	Description of Planned Changes to the Waiting List
	<p>During the waiting list transition described above, HABC will temporarily close all of the public housing waiting lists to facilitate the transition. HABC anticipates this transition will take approximately 18 months. With over 11,000 unique applicants*, HABC does not expect the temporary closure to impact leasing as there are enough applicants to fill vacancies during that time. Once the transition is complete, HABC will re-open all of the waiting lists with the following exception: HABC will not re-open any family, development specific waiting list if there are enough applicants to fill anticipated openings for the next five years.</p> <p>The Centrally Administered Mixed Population & Other Units Covered under Bailey waiting list will reopen after the transition to centrally managed location-based waiting lists. Closure of the waiting list will not have a discriminatory impact and is consistent with applicable civil rights and fair housing laws and regulations.</p> <p><i>*Applicants to public housing can apply to multiple waiting lists, if they are eligible. As of July 2019, there are 10,009 applicants to public housing (general family developments), 4,591 applicants to mixed population developments, and 772 applicants to senior developments.</i></p>
RAD Choice Mobility	<p>In November 2015, HABC converted public housing properties under HUD’s PBRA RAD program, and those properties are receiving project-based rental assistance. As part of the PBRA RAD conversion, HABC is required by HUD to provide residents of such RAD converted properties a Choice-Mobility option, which gives PBRA recipients the right to move with a tenant-based HCV to the private market the later of (1) 24-months from the date of execution of the HAP Contract, or (2) 24-months after the move-in date at the RAD property.</p> <p>Recipients who want the Choice Mobility option must request and choose this option. HABC has therefore created a waiting list specifically for Choice-Mobility requests from applicants who live in these RAD converted properties. Upon request by the recipients, HABC will add the household to the HCVP waiting list in the order in which the requests are received from eligible households.</p> <p>HABC is implementing a limit to the number of vouchers available for the Choice-Mobility option, as allowed by HUD, which equates to one-third of its annual HCV turnover. HABC will also limit the Choice Mobility option, as allowed by HUD, to 15% participation at each RAD</p>

Waiting List Name	Description of Planned Changes to the Waiting List
	site. In FY 2019, HABC anticipates setting aside approximately 200 vouchers for this Choice-Mobility option. The number of vouchers set-aside for FY 2020 will depend on FY 2019 attrition.

III. Proposed MTW Activities

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2020. HABC's numbering format includes the year the activity was proposed and a number which starts each year at "1" with successive MTW activities in the same year following as 2, 3, and so on.

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

Description of MTW Activity

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

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

3. For a unit not currently under HAP contract, HABC will provide owners with a self-inspection checklist as part of the Request for Tenancy Approval (RFTA). The checklist will include guidance that upon inspection by HABC, if the unit fails inspection, HABC will schedule a reinspection. There will be no fee for the first reinspection. If the unit fails at the first reinspection, HABC will charge the owner a reinspection fee for the second reinspection if the family wishes to continue the process of leasing that unit. The reinspection fee must be paid in full prior to HABC conducting a second reinspection of the unit. An example of this provision is as follows:
 - Completed RFTA and inspection checklist are submitted by an owner on April 4.
 - HABC inspects the unit on April 10, and the unit fails inspection.
 - HABC will give the owner 15 days to correct the deficiency and conduct the first reinspection without charge to the owner.
 - If at that first reinspection, the unit fails for deficiencies found on the initial inspection that have not been corrected, HABC will issue the tenant a new RFTA.
 - On April 30, the owner notifies HABC that the family is still interested in the unit and requests a second reinspection, advising that the deficiency has been corrected. HABC will confirm with the family that they are still interested.
 - HABC will not reschedule the reinspection until the owner pays the reinspection fee.
 - Upon receipt of payment for the reinspection fee, HABC reschedules the second reinspection for May 3.

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

The reinspection fee will not apply to:

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

Statutory Objective

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

Implementation Schedule

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

Metrics

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

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	Number of first initial inspection fails + second annual fails: 6,069 Total first inspection time: 6,069 * 1.65 hours per inspection = 10,014 hours Total first inspection costs: 10,014 * \$19.70 = \$197,276	Number of first inspection fails: 5,462 Total first inspection time: 5,462 * 1.65 hours per inspection = 9,012 hours Total first inspection costs: 9,012 * \$19.70 = \$177,536		

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

Cost Implications

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

Need/Justification for MTW Flexibility

This activity requires waiver of 24 CFR 982.405, as allowed under the MTW Agreement, Attachment C, paragraph D. 5. Currently, regulations allow for reinspection fees after the first failed inspection and do not stipulate whether the PHA can refuse to complete a reinspection

without first collecting the applicable fee. HABC will charge reinspection fees for existing units and for pre-contract unit that fail under the conditions stated above.

Rent Reform/Term Limit Information

Not applicable.

Activity #2020-02: Healthy Opportunities Program

Description of MTW Activity

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

Participating families will be provided mobility counseling, which will include assistance in identifying a healthy environment based on participant needs. Participants may also be provided incentives to move within opportunity areas, such as higher payment standards and security deposit/first month's rent assistance. HOP will assist no more than 50 families at any given time. Support and counseling will be provided to families during the housing search and up to 12 months after the effective date of the move. Upon successful completion of the program, HOP families will maintain their HCV, as long as they remain in compliance with program rules and regulations. HABC will evaluate the results of the program and may select new HOP participants upon turnover.

Only participants who complete mobility counseling and move to an opportunity area will be eligible for the higher payment standard and/or security deposit/first month's rent assistance.

Standard MTW policies and applicable regulatory requirements will apply to participants of the program. Finally, HABC may identify additional partner agencies as program needs dictate.

Statutory Objective

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

Implementation Schedule

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

Metrics

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

<i>HC #1: Additional Units of Housing Made Available*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% of AMI as a result of the activity (increase)	0	0		
<i>*HUD is requiring the use of this metric; however, HABC does not believe it is applicable in the context of this MTW activity, as the program will be not be developing new affordable housing.</i>				
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	50		

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

Cost Implications

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

Need/Justification for MTW Flexibility

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

Rent Reform/Term Limit Information

Not applicable.

Activity #2020-03: Local Forms

Activity Description

Under this initiative, HABC will create local versions of forms, as needed, to streamline processing, utilize “plain language”, address MTW policies and address local housing market features. HABC plans to develop local versions of the Project-Based Voucher (PBV) Housing Assistance Payment (HAP) contract, the Family Self-Sufficiency (FSS) Contract of Participation and Individual Training and Services Plan, the Request for Tenancy Addendum, the Tenant Based HAP Contract, and the Privacy Act Notice. Where the Privacy Act Notice is concerned, HABC will extend the expiration from 15 months to 36 months to accommodate the biennial and triennial recertification cycles. Any changes to the HAP form will be submitted to HUD for review and will include language noting that funding for the contract is subject to the availability of appropriations and other required provisions identified by HUD. Development of any local form must meet all applicable HUD requirements

Statutory Objective

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

Implementation Schedule

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

Metrics

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

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

Cost Implications

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

Need/Justification for MTW Flexibility

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

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

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

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

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

Rent Reform/Term Limit Information

Not applicable.

Activity #2020-4: Modified Rent Reasonableness Policy

Description of MTW Activity

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

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

HABC will utilize the rent ranges, by submarket and by bedroom size, to determine rent reasonableness. Additionally, depending on the applicable rent ranges in opportunity submarkets, HABC may increase the payment standards for opportunity submarkets to an amount no greater than 135% of FMR; however, this anticipated ceiling may be adjusted upon completion of the Rent Study once the market rents have been determined in the opportunity areas. At that time, HABC will amend the activity for HUD approval prior to implementing a payment standard if higher than 135%.

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

Statutory Objective

This initiative will support the MTW statutory objectives of reducing cost and achieving greater cost effectiveness in Federal expenditures and increasing housing choice. By reducing the cost of completing reasonable rent determinations, HABC will reduce costs associated with lease-ups and rent increase requests. Providing increased payment standards for opportunity areas, HABC will increase housing choice for voucher holders.

Implementation Schedule

Upon approval from HUD, HABC will engage an independent consultant to complete the analysis described above. In addition to the analysis, HABC will train staff on the policy and how to use the newly established rent ranges for reasonable rent. HABC expects the revised policy will be implemented by the end of FY 2020.

Metrics

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

Total cost of task in dollars (decrease)	<p>Time to determine rent reasonableness: .5</p> <p>Number of rent requests, new admissions and moves: 3,749*</p> <p>Staff hourly rate: \$30.77</p> <p>Total Cost: \$57,678</p>	<p>Time to determine rent reasonableness: .25</p> <p>Number of rent requests, new admissions and moves: 3,749*</p> <p>Staff hourly rate: \$30.77</p> <p>Total Cost: \$28,839</p>		
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*FY 2018 data was used to establish the baseline and benchmark.

CE #2: Staff Time Savings

Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	<p>Time to determine rent reasonableness: .5</p> <p>Number of rent requests, new admissions and moves: 3,749*</p> <p>Total Time: 1,875</p>	<p>Time to determine rent reasonableness: .25</p> <p>Number of rent requests, new admissions and moves: 3,749*</p> <p>Total Time: 937</p>		

*FY 2018 data was used to establish the baseline and benchmark.

CE #3: Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease)	<5%	<3%		

Cost Implications

While the activity streamlines HABC operations and will save agency costs and staff time associated with lease-ups and rent increase requests, the activity has other costs implications. HABC will pay an independent consultant to complete the housing market analysis described above. Additionally, there will be costs associated with implementing higher payment standards in opportunity neighborhoods. Once opportunity neighborhoods and rent ranges are established, HABC will have the independent consultant complete a comprehensive financial impact analysis of this activity.

Need/Justification for MTW Flexibility

This activity requires waiver of 24 CFR 982.507, as allowed under the MTW Agreement, Attachment C, paragraph D. 2.c. Currently regulations require PHAs to determine whether the rent to owner is a reasonable rent in comparison to rent for other comparable unassisted units. However, HABC is proposing to use rent ranges established by a housing market analysis.

Additionally, the activity requires waiver of 24 CFR 982.503, as allowed under the MTW Agreement, Attachment C, paragraph D. 2.a. HABC may base payment standards on market rate rents collected in the housing market analysis for opportunity neighborhoods, in place of utilizing HUD's FMRs.

Rent Reform/Term Limit Information

Not applicable.

IV. Approved MTW Activities

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

A. Implemented Activities

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

Plan Year Approved, Implemented, Amended

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

Description/Update

HABC is responsible for reexamination and verification of household income, household composition and other eligibility data. HABC will conduct a reexamination of household income and composition for all Public Housing and HCV families once every 24 months except under the circumstances outlined below:

Triennial Recertification

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

Annual Recertification

- PH families reporting zero income or minimal income. Minimal income is defined as less than \$2,000 in household gross income annually
- Residents living in Mod Rehab and Mod Rehab SRO units
- Residents with other vouchers that do not qualify based on HUD funding restrictions
- Residents with Homeownership vouchers
- Residents with HUD Awarded Special vouchers (Veterans Affairs Supportive Housing (VASH)).

Planned Non-Significant Changes

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

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

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

Additionally, HABC will begin to conduct annual recertifications for PH families reporting minimal income. Minimal income is defined as less than \$2,000 in household gross income annually.

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

The changes to this activity do not require any new waivers.

Planned Changes to Metrics/Data Collection

The cost and time associated with biennial and triennial recertifications were revised to accurately reflect the level of transactions. Changes have also been made to the metrics for Agency Cost Savings and Staff Time Savings, as HABC expects further Agency savings as a result of limiting households' interims.

Planned Significant Changes

No significant changes are planned.

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

CE #2: Staff Time Savings				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	Biennial and Triennial			
	PH: 23,920 hours HCV: 27,715 hours	PH: 7,715 hours 3,086 biennial and triennial recertifications completed X 2.5 hours/recert = 7,715 hours HCV: 16,758 hours 6,703 biennial and triennial recertifications completed X 2.5 hours/recert = 16,758 hours		
	Limit on Interims			
	HCV interims: 3,231 Time per interim: 45 min. HCV time on interims: 2,423 hours	HCV: interims: 969 Time per interim: 45 min. HCV time spent on interims: 727 hours		
*Assumed 2/3 of the interims completed were for voluntary purposes, i.e. change in income and the remaining 1/3 were for required purposes.				

Activity #2006-02 Enhanced Project Based Voucher Program

(Includes former activity: #2019-03, Project-Based Voucher Amendments to the HAP Contract)

Plan Year Approved, Implemented, Amended

- Percentage of Voucher Allocation: Approved and implemented FY 2006
- Floating Units and Per-Building and Per-Project Cap Waiver: Approved and implemented FY 2010
- Amendments to PB HAP Contracts (waiver of three-year restriction): Approved FY 2015 and implemented FY 2019
- Amount and Distribution of HCV Homeownership Assistance: Approved and implemented FY 2006
- Amendments to PB HAP Contracts for Target Populations: Approved FY 2019

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 and the non-Bailey LTA PB units.

- **Percentage of Voucher Allocation:** HABC reserves the right to allocate up to 30% of its Tenant Based HCV funding for PB vouchers.
- **Project Cap:** HABC may enter into PB Voucher HAP contracts for greater than 25% of the units in a project/development regardless of the family or household type that will occupy the units provided that the household is eligible. Units subsidized with PB vouchers under this MTW initiative are placed under a HAP contract upon turnover.
- **Floating Units:** HABC will allow for floating units instead of identifying specific units in the HAP contract in the PB program.
- **Amendments to PB HAP Contracts:** Using its MTW authority, HABC 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.

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 Human 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 been awarded 192 PBVs for the chronically homeless and 182 PBVs for veterans.
2. Owners are required to maintain the designated unit for the term of the PBV HAP contract. In the event the owner fails to lease a designated unit to an approved applicant, such failure will be considered a default under the PBV HAP Contract. If the default is not cured within 60 calendar days, HABC can remove the unit from the HAP contract, or recapture the amount of HAP paid for the period of time the tenant was occupying such unit in violation of the terms of the PBV HAP contract.

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

Planned Non-Significant Changes

- In FY 2020 HABC will waive the requirement for an independent entity to approve AHAP/HAP contract terms, renewals of HAP contracts, rent determinations and inspection of HABC owned units.
- HABC is combining the Project-Based Voucher Amendments to the HAP Contract activity under this Enhanced Project-Based Program activity.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2006-03: Thompson Biennial Recertifications

Plan Year Approved, Implemented, Amended

Approved FY 2006 and implemented FY 2007.

Description/Update

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

Planned Non-Significant Changes

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

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

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

Description/Update

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

- Elimination of mandated thresholds for number of participants in the HCVP program and expansion of the program to include public housing residents;
- Enhanced program design to target the populations in need;

- A focus on outcomes that includes homeownership and unsubsidized economic independence; and
- Revised procedures/regulations regarding the release of the escrow funds.

Planned Non-Significant Changes

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

Also in FY 2020, HABC will implement a system of financial incentives for completion of interim goals. Incentive payments will be paid at the completion of the FSS contract of participation and are contingent on the same requirements related to eligibility for release of escrow funds. HABC will retain authority to make interim disbursements in the event that enrollment in the specified activity is contingent upon receipt of the FSS incentive payment. Incentives include the following:

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

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

Planned Changes to Metrics/Data Collection

As this activity has been on hold since 2014, HABC has updated the metrics. Baselines represent households enrolled in FSS in FY 2019.

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)	\$13,908	\$14,227		
<i>*Baseline represents average earned income for households with earned income in FY 2019. Benchmark indicates an increase of 2.3% growth.</i>				
SS #2: Increase in Household Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of escrow of households affected by this policy in dollars (increase)	\$4,099	\$4,193		
<i>*Baseline reflects average escrow for households with escrow at the end of FY 2019.</i>				
SS #3: Increase in Positive Outcomes in Employment Status*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	202	224		
Employed Part-Time or Full-Time	164	176		
Enrolled in Education	10	11		
Enrolled in Job Training	30	33		
<i>*Baseline reflects households enrolled in FSS during FY 2019.</i>				
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	34	37		
<i>*Baseline represents FSS households receiving TANF benefits at the end of FY 2019.</i>				
SS #5: Households Assisted by Services that Increase Self-Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	366	400		
<i>*Baseline represents households enrolled in FSS during FY 2019.</i>				

SS #6: Reducing Per Unit Subsidy Costs for Participating Households*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease)	\$864	\$844		
<i>*Baseline represents average total HAP for households enrolled in FSS as of the end of FY 2019.</i>				
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase)	\$283	\$290		
<i>*Baseline represents average TTP for PH and HCV households enrolled in FSS at the end of FY 2019.</i>				
SS #8: Households Transitioned to Self-Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	30		
<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 2017
- Incentive Payments to Landlords: Approved FY 2019

Description/Update

Payment Standards for the Thompson Mobility Program will be set between 90 and 135 percent of the HUD published Fair Market Rent. The payment standard will be set using a consistent methodology that compares the ratio of area median rent to the actual rent of the census tract. Implementation of exception payment standards is subject to funding availability.

Additionally, as authorized in Section IV.B.5 of the Thompson Settlement Agreement, BRHP will use HAP funds for payment to landlords to cover a security deposit for Baltimore Housing Mobility Program participants leasing in a census tract designated “opportunity” by BRHP. Subject to funding availability, BRHP will offer each participant this Security Deposit Assistance on a one-time basis, and only if that participant has repaid the entire balance of any previously grant-funded Security Deposit Assistance Loan and is otherwise in good standing with BRHP. The Security Deposit Assistance will not exceed the equivalent of one-month’s rent, and BRHP will require a participant contribution towards the security deposit of between \$200 and \$500 dollars, which will be adjusted seasonally to encourage leasing in summer months.

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

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2009-01: MTW Homeownership Program

Plan Year Approved, Implemented, Amended

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

Description/Update

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

In FY 2020, HABC will work with the City of Baltimore to develop a revitalization plan and identify scattered site units in areas selected for revitalization. Pending selection of the units, where applicable, demo/dispo applications will be submitted to HUD for review. Upon approval, HABC will commence with development of the scattered site homeownership properties, which will be available to homeownership eligible HCV and PH families. HABC anticipates that construction will begin in FY 2020; however, completion of the homeownership units will not occur until FY 2021.

Planned Non-Significant Changes

In FY 2020, HABC will add a feature to its MTW Homeownership Program to ease the transition from subsidized homeownership assistance. Specifically, HABC will develop a schedule of decelerated assistance for an additional five years at the end of the family's applicable assistance term. The decelerated assistance schedule is as follows:

- Participant pays 30% of their monthly household income plus:
- Year 1: 50% of the balance of the mortgage payment;
- Year 2: 60% of the balance of the mortgage payment;
- Year 3: 70% of the balance of the mortgage payment;
- Year 4: 80% of the balance of the mortgage payment; and
- Year 5: 90% of the balance of the mortgage payment

Planned Changes to Metrics/Data Collection

As this activity has been on hold since FY 2014, HABC has updated the 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	0 households*		
<i>*There are no FSS participants with a homeownership goal who are expected to purchase a home in FY2020.</i>				

HC #6: Increase in Homeownership Opportunities				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of this activity (increase)	0	0*		
<i>*There are no FSS participants with a homeownership goal who are expected to purchase a home in FY2020.</i>				
HC #7: Number of Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)*	366	400		
<i>*Represents total number of households participating in FSS.</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2010-01: Unit Sizes

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

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

HABC will grant reasonable accommodations and may waive the requirement in cases where a household has exhausted all housing search efforts and is unable to locate a unit not greater than

the unit size listed on their voucher. Exceptions to this rule may be granted as a reasonable accommodation.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

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

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

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

HABC created an amendment to the HAP contract that sets forth requirements for the Bailey LTA PB units. The amendment increased the term of the contract to 40 years, consistent with the long-term affordability period and set forth what public housing rights, privileges and benefits must be afforded the residents in Bailey LTA PBV Program units. In FY 2020, PBV Program units at the Greenmount and Chase will come on line using the flexibility in this activity.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2010-03: Thompson Risk Based Inspections

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

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

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2012-01: Rent Simplification - Thompson

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

Plan Year Approved, Implemented, Amended

- Adjusted Income and Asset Income: Approved and implemented FY 2012
- FT Student and Adoption Assistance Exclusion: Approved and implemented FY 2014

Description/Update

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

- **Modified Deductions:** The gross annual income shall be reduced using the standard deductions outlined below. There will be a standard deduction for working families, elderly families, disabled families and non-disabled families without wages. The deductions below replace all other regulatory deductions. The deductions are:
 - \$3,200 for households with wages
 - \$1,200 for households without wages
 - \$400 for any elderly or disabled family (to be combined with either of the above deductions)
- **Exclusion of FT Student & Adoption Assistance Payments:** The definition of annual income is modified to exclude all earned income from full-time adult students, other than the head of household, co-head and spouse as well as exclude all adoption assistance payments.
- **Asset Income Exclusion and Self-Certification:** HABC also excludes all income from assets when the cash value of the asset is less than \$50,000. Additionally, for households where the cash value of the assets is less than \$50,000, BHRP will allow self-certification of asset value and income. This initiative will reduce the time it takes to verify income. This rent simplification measure will increase efficiency without having any negative impact on increasing residents' rent.

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

Planned Non-Significant Changes

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

- BRHP will calculate asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings rate when the market/face value of the family's assets is in excess of \$50,000.
- In FY 2020, the hardship policy will be extended so that families may request the use of regulatory deductions and exclusions if adjusted income would be lower than adjusted income calculated using BHRP standard deductions. The request must be made within 14 calendar days of the notification of the change in family rent share.
- BRHP will calculate seasonal income using the past four quarters of income as reported by Enterprise Income Verification's (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

Description/Update

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

The LTA-PB Units shall be managed and operated primarily in accordance with the HUD regulations governing public housing units (e.g., 24 CFR Parts 5, 960, 966, and the like) (the Housing Authority of Baltimore City | FY 2020 MTW Annual Plan

“Public Housing Regulations”), even though the LTA-PB Units will be subsidized with project-based voucher funds. The LTA-PB Units shall remain affordable for a minimum of 40 years. The LTA-PB Program will provide to applicants for, and residents of, the LTA-PB Units, most of the rights, privileges and benefits that are provided under the public housing regulations. LTA Project-Based units are occupied by families on the public housing waiting list.

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

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

Approved FY 2017; Implemented FY 2019

Description/Update

The Transitional Housing Program allows HABC to partner with the Women’s Housing Coalition and other organizations to provide permanent housing for up to 25 homeless/hard-to-house families.

- All referred applications will be screened in accordance with HABC waiting list policies and eligibility criteria; and
- HABC may create a special waiting list for the specific population.

HABC defines self-sufficiency as the ability to achieve economic independence, through employment that will allow individuals and/or families to become self-sufficient (not dependent

on welfare assistance). Families will be able to achieve self-sufficiency through this program in the following areas:

- Obtaining a source of income;
- Participating in job training programs; and
- Securing permanent housing.

Voucher subsidies will be provided to the owner of the contract for all eligible participants. Program participants will be required to comply with all program rules and guidelines. Failure to comply will result in the termination of assistance and program participation.

HABC has executed the HAP contract for these units effective June 1, 2019. In FY 2020, HABC will continue to work with the Women’s Housing Coalition to ensure full utilization of these vouchers.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2019-01: Rent Simplification

Plan Year Approved, Implemented, Amended

Approved FY 2019; planned implementation end of 3rd quarter 2019

Description/Update

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

- *Exclusion of all FT Student Earned Income* – Under Rent Simplification, HABC excludes all full-time student earned income for adult full-time students, other than the head of household, co-head and spouse. HABC will continue to apply a dependent deduction to adult full-time students. Additionally, as HABC is excluding 100% of earned income for adult full-time students, HABC will only verify full-time student status; however, HABC will not conduct verification of full-time student earned income.

- *Self-Certification of Asset Value and Income and Exclusion of Asset Income* – HABC established \$50,000 as the threshold for self-certification of asset value and income. When the market/face value of assets is over \$50,000, HABC will apply regulatory verification requirements. Additionally, HABC excludes income from assets where the market/face value of the asset is up to \$50,000. When the market/face value of a family’s assets is in excess of \$50,000, HABC will calculate asset income by taking the market/face value of the family’s assets and multiplying that value by the established passbook savings rate.

Planned Non-Significant Changes

In FY 2020, HABC will adopt the following two policies:

- HABC will calculate medical expenses for eligible participants using past paid, unreimbursed expenses in addition to prospective medical insurance premiums. Over the counter medications will not qualify for a deduction unless accompanied by a prescription and paid receipts. This change will alleviate the need to try to determine anticipated medical procedures and expenses, which cannot be accurately forecasted; however, there is no change to the amount and type of medical expenses which can be deducted; and
- HABC will calculate seasonal income using the past four quarters of income as reported by the Enterprise Income Verification’s (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment.

None of the proposed changes requires additional MTW authorizations nor do they represent a significant modification to the previously approved activity.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2019-02: Local Fair Market Rent

Plan Year Approved, Implemented, Amended

Approved FY 2019; planned implementation July 1, 2019

Description/Update

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

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

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

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

HABC plans to implement this activity in FY 2020.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

B. Not Yet Implemented Activities

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

C. MTW Activities on Hold

Activity #2009-02: Section 811 Supportive Housing

Description

HABC proposed combining MTW funds with 811 funds to create units for non-elderly persons with disabilities pursuant to the Bailey Consent Decree. HABC intended to make these funds available through a competitive process and will require developers to demonstrate through specified documentation that the project has a gap that cannot otherwise be addressed.

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

Plan for Reactivating the Activity

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

Explanation of Non-Significant Changes Since Approval

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

Activity #2012-02: Direct Homeownership Program

Description

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

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

Plan for Reactivating the Activity

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

Explanation of Non-Significant Changes Since Approval

No changes have been made since approval.

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

Description/Update

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

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

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

Plan for Reactivating the Activity

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

Explanation of Non-Significant Changes Since Approval

No changes have been made since approval.

D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that HABC has completed, discontinued, or determined do not require MTW authority to implement. HABC will report on any additional activities, which have been closed out in the FY 2019 MTW Report.

Table 10: Closed-Out MTW Activities

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Risk-Based Inspections (Activity #2006-05)	Approved: FY 2006 Implemented: FY 2014	FY 2019	HABC implemented a Risk-Based inspection process in order to ensure that the highest housing quality standards are maintained and that HABC resources are utilized in an efficient and effective manner. Units that have consistently met annual inspection standards, will be inspected every two years. Units which do not have such a track record are inspected annually. HABC closed out this activity due to the 2014 Appropriations Act that allows HABC to transition to a biennial inspection schedule without MTW authority.
Project-Based for Transitional Housing (Activity #2007-02)	FY 2007/2008	FY 2014	HABC provided PB vouchers to the Collington House facility that is a transitional housing program. In 2014, the Collington House facility lost its eligibility to retain project-based vouchers and this program was closed out.
Payment Standards at the 50 th Percentile (Activity #2009-03)	FY 2009	FY 2011	HUD had adjusted the area Fair Market Rent (FMR) to the 50 th percentile for HABC; therefore, MTW authority was no longer required and this activity was closed out in FY 2011. Please note that this activity was re-proposed in the FY 2019 Plan as the 50 th percentile FMR was being phased out. At the time the activity was closed, use of the 50 th percentile FMR was provided by HUD, and MTW authority was not needed.
TDC Limits (Activity #2009-04)	FY 2009	FY 2015	HABC established a local Total Development Cost policy to acquire the 58 scattered site units under the Thompson Consent Decree. This activity was approved by HUD via a letter dated March 12, 2009. In January 2012, the last scattered site unit was acquired, and this activity has been closed out.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
HAP Contract Modifications (Activity #2009-05)	Approved: FY 2009 Implemented: FY 2010	FY 2019	Using MTW authority, HABC will allow for floating units instead of identifying specific units in the HAP contract in the Project-Based Voucher program. This previously HUD approved activity was closed out and combined with other previously HUD approved Project- Based Program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
Utility Allowance for Families Living in Larger Units than Voucher Size (Activity #2010-04)	Approved: FY 2010 Implemented: FY 2012	FY 2014	Under the 2014 Appropriations Act, the rule on utility allowances changed to require that PHAs match the utility allowance payment to the actual unit size and not the voucher size. This MTW activity, approved in FY 2010, was incorporated into the Unit Size activity and implemented in FY 2012. Based upon the 2014 Appropriations Act language, HABC no longer needs to designate this activity as MTW.
Gilmor Self Sufficiency Initiative (Activity #2010-05)	FY 2010	FY 2017	This activity simplified the rent policy for staff and residents, and encouraged employment, job retention and wage progression. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015, and the activity was closed out in FY 2017 when HABC became the recipient of a \$2.5 million Jobs Plus grant that provides employment counseling to public housing residents that otherwise could not be provided under MTW.
Rent Increase Determinations (Activity #2011-01)	FY 2011	FY 2016	This activity increased cost effectiveness in Federal expenditures by keeping program spending within budgetary limits. Suspending rent increase adjustments helped keep HCV Program spending within budgetary limits. Exceeding available funding had the potential to force HABC to withdraw assistance from a number of families causing a hardship for those families and property owners. This MTW activity was intended to keep spending within budgetary limits. It was closed out in FY 2016 since HABC was able to maintain budgetary limits without imposing suspension of rent increases to owners.
Asset Self-Certification (Activity #2011-02)	FY 2011	FY 2019	To streamline operations, HABC allowed residents to self-certify income from assets with total asset values per household of less than \$5,000. The Asset Self-Certification activity was approved by HUD in FY 2011. HABC closed out this activity and re-proposed it in FY

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			2019 as part of the Rent Simplification activity. This action allows HABC to report on all Rent Simplification activity features under one activity.
Rent Policy (Activity #2012-03)	FY 2012	FY 2015	HABC received HUD approval in FY 2012 to implement an Agency-wide rent policy adopted for Gilmor Homes; however, due to lack of funding and the on-going revisions of the Gilmor Homes rent policies, this activity was placed on hold in FY 2014. This activity was identical to the Gilmor Homes Demonstration Program and was implemented at the remaining HABC sites. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015.
Adjusted Income for Thompson Participants (Activity #2012-04)	FY 2012	FY 2019	<p>Pursuant to HABC’s MTW authority, for participants in the Baltimore Housing Mobility Program, gross annual income was reduced using standard deductions. This activity was approved and implemented in FY 2012. There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions replace all other regulatory deductions. The deductions are:</p> <ul style="list-style-type: none"> • \$3,200 for households with wages • \$1,200 for households without wages • \$400 for any elderly or disabled family (to be combined with either of the above deductions) <p>This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now call Rent Simplification – Thompson (Activity #2012-01).</p>
Adoption of New Investment Policies for HABC (Activity #2013-01)	Approved: FY 2013 Not Implemented	FY 2015	In FY 2013, HABC proposed adopting new investment policies, thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General Depository Agreement with the State. This activity was never implemented.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Journey Home (Activity #2013-02)	FY 2013	FY 2017	Under this activity, HABC exercised its MTW fund flexibility in order to use MTW Block Grant Funds as housing subsidy for participants in the Journey Home Program. The Journey Home Program was closed in FY 2016 and the activity was closed out in FY 2017.
Exclude Income from Full-Time Students and Adopted Household Members (Activity #2014-02)	FY 2014	FY 2019	Using MTW authority, HABC modified the definition of annual income by excluding FT student earned income and adoption assistance income for families living in Thompson units. These exclusions were part of an effort to support economic self-sufficiency as well as to streamline program administration. As 100% of the income from these two sources is excluded, third party verification of income is not required. This activity was approved and implemented in FY 2014. This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now called Rent Simplification – Thompson (Activity #2012- 01).
Encouraging Leasing in Higher Opportunity Neighborhoods (Activity #2015-01)	Approved: FY 2015 Not Implemented	FY 2016	Using its MTW authority, the Baltimore Regional Mobility Program required families to select units that are consistent with and not larger than the dwelling unit size listed on their voucher. This policy applied to new admissions as well as to participating households who requested program moves. HABC, on a case-by-case basis, made exceptions to this policy as a reasonable accommodation. This MTW activity was planned for implementation in FY 2015. However, upon further consideration, BRHP decided not to implement this activity and it was closed out in FY 2016.
Energy Conservation Utility Allowance (Activity #2015-02)	FY 2015	FY 2016	HABC provides a Utility Allowance to households responsible for payment of utilities for water, electricity, gas, other heating, cooking fuels and sewage services. In an effort to reinforce energy conservation activities and reduce the cost of water/sewage utility allowances, HABC will encourage the completion of a water audit and use of low-flow toilets by HCV tenants and landlords/owners. This MTW activity was placed on hold due to comments from the public and closed out in FY 2016.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
The Front Door Program (Activity #2015-03)	FY 2015	FY 2017	HABC partnered with the Mayor’s Office of Human Services/Homeless Services Program, Sarah’s Hope (a shelter for the homeless) and St. Vincent De Paul to provide MTW Block Grant funds to the Front Door Program to rapidly house 36 homeless families for up to one year using two distinct strategies. The contract ended December 31, 2014, six months into HABC’s FY 2015, and was not renewed, which resulted in closure of the activity.
Project Based Voucher Amendments to the HAP Contract (Leased Housing) (Activity #2015-04)	FY 2015	FY 2019	Using its MTW authority, HABC waived the three-year contract amendment restriction, which will allow HABC to amend the HAP contract at any time during the initial term of the HAP contract and during any renewal term of the HAP contract. Under this activity, HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PBV units and the non- Bailey LTA PB units. This activity was previously on hold and was approved in FY 2015. HABC closed out this activity and combined it with other previously HUD approved Project Based program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
Security Deposit Assistance (Activity #2017-02)	FY 2017	FY 2019	Under this activity, BRHP will use HAP funds for payment to landlords to cover a security deposit for Baltimore Housing Mobility Program participants leasing in a census tract designated “opportunity” by BRHP. Subject to funding availability, BRHP will offer each participant this Security Deposit Assistance on a one-time basis, and only if that participant has repaid the entire balance of any previously grant-funded Security Deposit Assistance Loan and is otherwise in good standing with BRHP. The Security Deposit Assistance will not exceed the equivalent of one-month’s rent and BRHP will require a participant contribution towards the security deposit of between \$200 and \$500 dollars, which will be adjusted seasonally to encourage leasing in summer months. This activity was approved and implemented in FY 2017. HABC closed out this activity and combined it with other previously HUD approved Mobility Program Enhancement activities. HABC also modified this activity in FY 2019 under the previously approved Mobility Enhancement activity.

V. Sources and Uses of MTW Funds

This section of the Annual Plan describes HABC’s planned 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.

A. Estimated Sources and Uses of MTW Funds in FY 2020

HABC’s MTW Block Grant includes three major funding sources:

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

i. Estimated Sources of MTW Funds

Table 11: Estimated Sources of MTW Funding for FY 2020

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$20,050,425
70600	HUD PHA Operating Grants	\$310,314,992
70610	Capital Grants	\$26,414,426
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$524,598
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$761,654
70000	Total Revenue	\$358,066,095

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 2020.
- HABC’s Total Operating Grants of \$310,314,992 from HUD include the following funding estimates:

- Section 8 HCV HAP subsidies in the amount of \$155,043,686 for Regular HABC Vouchers, including Port ins and \$74,646,187 for Thompson Partial Consent Decree and Remedial Vouchers;
- Ongoing Administrative Fee Earned in the amount of \$15,150,054 (\$11,784,283 for Regular HABC Vouchers, \$3,365,771 for Partial Consent Decree and Remedial Vouchers); and
- Public Housing Subsidies of \$65,475,065 is budgeted based on an estimated 90% funding proration for the calendar year ending December 31, 2020.
- Capital Grants funding of \$26,414,426 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, tenant charges and antenna income from the Public Housing Program. It also includes Fraud Recovery for the recovery of funds from the Section 8 HCV program.

ii. **Estimated Uses of MTW Funds**

Table 12: Estimated Uses of MTW Funding for FY 2020

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$39,232,126
91300+91310+92000	Management Fee Expense	\$289,594
91810	Allocated Overhead	\$(283,165)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$47,012,576
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$17,181,832
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$32,546,794
95000 (95100+95200+95300+95500)	Total Protective Services	\$553,530
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$3,458,127
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$6,292,943
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$1,973,968
97100+97200	Total Extraordinary Maintenance	\$1,053,639

FDS Line Item Number	FDS Line Item Name	Dollar Amount
97300+97350	Housing Assistance Payments + HAP Portability-In	\$227,289,872
97400	Depreciation Expense	\$21,100,000
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$354,701,836

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

Total Expenses	\$354,701,836
Less: Depreciation Expense	\$(21,100,000)
Capital Hard Cost	\$24,543,446
MTW Uses of Funds	\$358,145,283

Uses of Funds exceed Sources of Funds by \$79,188, which will be funded by MTW reserves.

Notes to Expenses:

- Administrative expenses include salaries and benefits for administrative staff, salaries and benefits for Housing Management staff at the Asset Management Project (AMP) levels as well as program staffs for the Section 8 HCV Program. In addition, this category includes operating expenses such as office rent, telephone, computer materials and contracts, postage and supplies for all programs.
- Management Fees expense includes fees for HABC’s Privately Managed Sites by outside management firms and fees to BRHP for the Mobility counseling program.
- Allocated Overhead is calculated based on HUD’s approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for FY 2020 are included in Appendix A.
- Tenant Services includes salaries, benefits, materials and supplies used to support tenant councils and the Resident Advisory Board, and to provide direct services to residents of public housing.
- Utilities include expenses for water, electricity, gas, steam and fuel consumed by HABC’s AMPs. HABC continues to exercise prudent procurement actions to achieve favorable utility rates. Utility consumptions are adjusted based on addition or demolition activities planned for the fiscal year.
- Ordinary Maintenance includes salaries and benefits of maintenance workers assigned to public housing units. It also includes maintenance materials and maintenance contracts used for ordinary maintenance operations. This category also includes outside contract

costs to privatized firms, which manage some of HABC's public housing and affordable housing units.

- Protective Services includes outside security contracts for the developments.
- Insurance Premiums are budgeted for properties, general liability, worker's compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
- Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT).
- Interest Expense is budgeted for interest associated with the EPC Debt Service.
- Extraordinary Maintenance is planned for the unforeseen breakdown of heating systems, boilers, chillers, etc. This line also includes Casualty Loss, which is estimated for unforeseen repairs and losses at public housing units that are not covered by insurance carriers.
- HAPs include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program. Section 8 HCV HAP expenditures are budgeted in the amount of \$227,289,872 (\$155,043,685 for Regular HABC Vouchers-including Port-ins, and \$74,646,187 for Partial Consent Decree and \$ Remedial Vouchers). The Plaintiffs of the Thompson Consent Decree have created the nonprofit corporation, BRHP, to serve as Administrator beginning January 2013 and therefore, the HAP amount for Thompson consent decree and remedial vouchers in CY 2020 is reported as a pass-through from HABC to BRHP.
- Depreciation Expense is estimated for the costs of tangible fixed assets allocated over their useful lives. Depreciation expense is based on HABC's fixed asset records and depreciation methods.

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW Agreement allows HABC to combine public housing operating and capital funds including DDT provided under Section 9, and HCV's tenant-based voucher program funds provided under Section 8 of the 1937 Act into a single, authority-wide block grant funding source. HABC uses this combined funding source to carry out MTW program activities in support of MTW statutory objectives to achieve greater costs effectiveness and to increase housing choices for low-income families.

The following activities will take place in FY 2020 using the single fund flexibility concept:

- In FY20, HABC may choose to direct limited surplus ACC funds to support an HCVP operating program deficit, as administrative fees in that program are particularly constrained.

B. Local Asset Management Plan (LAMP)

- i. *Is the MTW PHA allocating costs within statute?*
- ii. *Is the MTW PHA implementing a local asset management plan (LAMP)?*
- iii. *Has the MTW PHA provided a LAMP in the appendix?*
- iv. *If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan year.*

HABC does not propose any changes to the LAMP in FY 2020.

C. Rental Assistance Demonstration (RAD) Participation

i. *Description of RAD Participation*

Table 13 includes RAD conversions which have closed or are projected to close by the end of the current fiscal year. Table 14 includes RAD conversions which are slated for conversion after FY 2020. Actual timetables for conversion and/or HABC’s decision to proceed with conversion may vary from the information included below, depending on various factors including project feasibility determinations, project financing, timetables for HUD and other approvals and other factors. The timetable for RAD conversions extends beyond FY 2020 and continues to be refined in consultation with HUD and HABC’s resident leadership. The listed projects may be modified in the future and are subject to approval by HUD and the HABC Board of Commissioners. HABC may apply for additional RAD conversions beyond those shown in Tables 13 and 14.

Table 13: RAD Conversions Closed or Projected to Close by the End of FY 2019

Property Name	No. of Units Converted to PBRA	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Allendale	164	PBRA	11/15	Submitted to HUD for certification of completion	5/12/15	10/27/15

Property Name	No. of Units Converted to PBRA	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
BE Mason	223	PBRA	11/15	Under review for HUD certification of completion	5/12/15	10/27/15
Bel Park Tower	253	PBRA	11/15	Submitted to HUD for certification of completion	5/12/15	10/27/15
Brentwood	150	PBRA	12/15	Under review for HUD certification of completion	5/12/15	10/27/15
Broadway Overlook	84	PBRA	8/17	Submitted to HUD for certification of completion	10/26/16	01/26/17
Chase House	189	PBRA	12/16	Submitted to HUD for certification of completion	5/12/15	10/27/15
Ellerslie	117	PBRA	2/17	Under review for HUD certification of completion	10/26/16	01/26/17
Govans Manor	191	PBRA	11/16	Under review for HUD certification of completion	10/26/16	01/26/17
Hillside Park	30	PBRA	12/17	Submitted to HUD for certification of completion	12/1/17	6/29/18
Hollins House	130	PBRA	11/15	Under review for HUD certification of completion	5/12/15	10/27/15
Lakeview Tower	302	PBRA	11/15	Submitted to HUD for certification of completion	5/12/15	10/27/15
McCulloh Extension	347**	PBRA	11/16	Under review for HUD certification of completion	5/12/15	10/27/15
Primrose Place	125	PBRA	2/16	Under review for HUD certification of completion	5/12/15	10/27/15
Pleasant View Gardens Senior	110	PBRA	7/16	Submitted to HUD for certification of completion	5/12/15	10/27/15
Pleasant View Gardens Townhomes	201	PBRA	9/16	Submitted to HUD for certification of completion	5/12/15	10/27/15

Property Name	No. of Units Converted to PBRA	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Senior Townes at the Terraces	47	PBRA	11/17	Submitted to HUD for certification of completion	10/26/16	01/26/17
Wyman House	168	PBRA	12/15	Under review for HUD certification of completion	5/12/15	10/27/15
Heritage Crossing	75	PBRA	11/18	Projected completion of construction July 2019	12/1/17	6/29/18
J. Van Story Branch Apts	350***	PBRA	11/18	Projected completion of construction November 2020	12/1/17	6/29/18
Monument East	170	PBRA	10/18	Projected completion of construction December 2019	12/1/17	6/29/18
Rosemont Tower	203	PBRA	9/19	Projected to close December 2019	12/1/17	6/29/18
Scattered Sites (Thompson 58/Broadway Homes)	58	PBRA	5/19	Projected completion November 2020	04/12/17	12/27/17
Somerset Extension	58	PBRA	9/19	Projected to close December 2019	12/1/17	6/29/18
Total	3,745					

**Date reflects submission of the latest revision to the applicable Plan which was subsequently approved by HUD.*

*** 2 dwelling units were lost due to conversion to laundry facilities*

**** 7 dwelling units lost due to addition of an elevator and laundry facilities*

HABC does not anticipate any RAD conversions in FY 2020. The table below identifies projects that are anticipated to be converted under RAD after FY 2020. Future RAD Significant Amendments will be prepared and submitted per HUD required timelines.

Table 14: RAD Conversions Projected to Close in FY 2020 and Future Years

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Carey House	23	PBRA	Yes	RFP out to pre-qualified developer pool. Proposals are due 7/15/19. RAD conversion will not take place in 2020.
Laurens House	36	PBRA	Yes	RFP out to pre-qualified developer pool. Proposals are due 7/15/19. RAD conversion will not take place in 2020.
Dukeland	27	PBRA	Yes	RFP out to pre-qualified developer pool. Proposals are due 7/15/19. RAD conversion will not take place in 2020.
The Rosemont	106	PBRA	Yes	RFP out to pre-qualified developer pool. Proposals are due 7/15/19. RAD conversion will not take place in 2020.
Oswego Mall	35	PBRA	Yes	RFP out to pre-qualified developer pool. Proposals are due 7/15/19. RAD conversion will not take place in 2020.
ShIPLEY Hills	21	PBRA	Yes	RFP out to pre-qualified developer pool. Proposals are due 7/15/19. RAD conversion will not take place in 2020.
Hollander Ridge	94	PBRA	Yes	The acquisition of 94 units was completed in June 2019; construction start date in the fall of 2019. Full conversion will not take place until the end of 2020.
Perkins RAD/CNI	629	PBRA	Yes (first 100 units)	CHAP award received for first 100 units and commitment to reserve conversion authority for all remaining 629 units from HUD. However, no RAD conversions planned in 2020. Perkins first phased demo to begin January 2020; phased new construction under various stages of financing.

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Poe Homes	288	PBRA	Yes	Developer selected; POE Draft of Development Plan to be submitted to HUD in March 2020; final plan is due September of 2020.
McCulloh Homes	556	PBRA	Yes	The overall concept plan for the site has not been developed. RAD conversions will not take place in 2020 and will not occur until after the plan is developed and approved.
Arbor Oaks	62	PBRA	Yes	HABC to acquire in 2019. RAD conversion may take place in 2020. RAD Significant amendment submitted in 12/1/17 and approved on 6/29/18
Townes at the Terraces	203	PBRA	Yes	HABC to acquire in 2019. RAD conversion may not take place in 2020. RAD Significant amendment submitted in 12/1/17 and approved on 6/29/18.
TOTAL	2,078			

- 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.*

No

- 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.*

Not Applicable. HABC has not provided any RAD Significant Amendments with this plan. Future RAD Significant Amendments will be prepared and submitted per HUD required timelines.

VI. Administrative

A. Board Resolution and Certification of Compliance

A Resolution approving the FY 2020 MTW Annual Plan and the MTW Plan Certification of Compliance (Appendix B) was adopted by the HABC Board of Commissioners at the September 17, 2019 meeting, following the public review process and public hearing. The Resolution is included in Appendix C.

B. Documentation of Public Process

HABC provided public notice of the draft FY 2020 MTW Annual Plan and posted the Plan on its website. HABC also made copies of the FY 2020 Annual Plan available at HABC's main offices and at the Enoch Pratt Free Library. A 30-day public comment period to allow for resident and general public review was provided from July 31, 2019 through August 30, 2019. A public hearing was held on August 22, 2019 at Pleasant View Gardens (201 N. Aisquith Street, Baltimore, MD), an accessible facility. Prior to finalizing the Plan, HABC considered all comments received during the public review process. See Appendix D for additional public notice and comment period materials.

C. Planned and Ongoing Evaluations

HABC will continue to monitor and evaluate MTW activities during FY 2020. At this point, HABC does not intend to use external evaluators for new or ongoing MTW initiatives. Internal reports will be generated on a periodic basis to assess performance against proposed targets. Quarterly internal reviews are conducted with program staff and management to review and evaluate results and, if necessary, to modify proposed strategies to improve results. Annual evaluation results will be reported as appropriate by HABC in the MTW Annual Report.

D. Lobbying Disclosures

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

Appendix A: Local Asset Management Plan

HABC CY 2020 Indirect Cost Rate Explanation

This cost allocation plan and process for Calendar Year 2020 represents year nine of HABC's local asset management plan allowed and approved as a component of its MTW participation.

Cost Allocation Approach

This indirect rate calculation is modeled directly on the past few years' methodology. Consistent with the OMB Circular A-87 cost principles, HABC has identified and segregated all its costs into a direct cost pool and an indirect cost pool. The basic principle to determine whether costs should be treated as direct or indirect is whether the cost can be directly attributed to one program or to multiple programs. Those costs that can generally be attributed to supporting one program are included as direct. Included in the direct pool are:

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

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

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

- Most central office departments, including Executive, Finance, Human Resources, Information Technology.

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 2019 Approved Consolidated Budget. Based on this budget and the attached schedule, **the indirect cost rate for CY2020 will be 17.69% for MTW and 8.96% for non-MTW (see Attachment A for detail).**

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

HABC Proposed Cost Allocation Methodology - FY 2020												
Calculation of Indirect Cost Rate												
All costs used in this analysis are from the HABC Fiscal Year 2019 Approved Consolidated Budget.												
Direct	OFR Treatment	FY19	Change	Share	MTW	Non-MTW	OH Limit	OH shortfall	Comments	Proof	Sites Total	Ind Depts
Sites (LIPH)	Dir	61,992,637	0%	56%	61,992,637					-		
Sites PVT	Dir	7,506,819	11%	7%	7,506,819					-		
Sites (CFP hard-includes ECI)	Dir	17,794,513	-33%	0%	17,794,513					-		
Sites (CFP soft - includes ECI)	Dir	1,221,835	4%	1%	1,221,835					-		
Sites - Spec/Non-routine	Dir	1,100,000		0%	1,100,000					-		
EPC Costs (Hard)	Dir	4,465,781	-1%	0%	-	4,465,781				-		
EPC Soft	Frontline	800,711	8%	1%	660,164	140,547				-		
Crews	COCC	2,583,968	15%	2%	2,583,968					-		
HCVP HAP	Dir	226,134,903	44%	0%	218,531,120	7,603,783				0		
HCVP Admin	Dir	9,366,619	3%	9%	9,040,261	326,358				-		
		-	#DIV/0!	0%						-		
Development Hard/HOPE VI	Dir	9,102,080	-16%	0%	-	9,102,080				-		
Development Soft	Mixed	-		0%						-		
DHCD Hard	Dir	1,661,227		0%	-	1,661,227				-		
DHCD Soft	Mixed	-		0%	-	-			Excluded, no OH charge	-		
RAB	Dir	191,118	5%	0%	191,118	-				-		
Res Serv - LIPH	Frontline	1,667,810	-1%	2%	1,667,810					-		
Res Serv - Grants	Frontline	3,200,613	41%	3%		3,200,613	-	545,024	Likely charge to AMPs	-		
F&A Frontline		-		0%		-				-		
HABCO Hard	Dir	-		0%	-	-				-		
HABCO Soft	Frontline	1,331,327	-8%	1%	-	1,331,327				-		
Hsg. Applic.	Frontline	1,336,314	20%	1%	1,336,314					-		
Hsg. Ops. (dir)	Frontline	2,858,471	2%	3%	2,858,471					-		
Homnshp	Frontline	-	-100%	0%						-		
Legal, Lease enforcement	Frontline	-		0%						-		
Relocation	Frontline	-	-100%	0%						-		
Work Order Ctr.	Frontline	-		0%	-					-		
Fund 113	Dir	1,751,755	0%	2%	-	1,751,755				-		
Undesignated/Legacy	Frontline	870,400	-64%	1%	870,400					-		
Legal FL	Frontline	-	-100%	0%						-		
Less AMP/FL planned cuts	FL/Dir	(1,782,452)			(1,782,452)					-		
									7,584,277	-		
Subtotal Direct		355,156,450	21%	88.0%	325,572,978	29,583,472	355,156,450			-		
					92%	8%				(1)		
<i>Less: Non-Relevant Expenses</i>										-		
Hard Cost (Devel, HABCO)		31,362,374	-25%		17,794,513	13,567,861				-		
HAP		226,134,903	44%		218,531,120	7,603,783				0		
Debt Service										-		
DHCD Hard cost		1,661,227			-	1,661,227				-		
RAD Deduct (out in 20) *		6,500,000	59%		6,500,000	-				-		
Subtotal Direct		89,497,946	-2%		82,747,345	6,750,601	89,497,946			-		
					92%	8%			Total Program Cost			

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

			Change		92%	8%			Total Program Cost (Direct + Indirect)
					MTW Direct	Non-MTW Dir	MTW Indir	Non-MTW Ind	
Low Rent		71,825,085	-4%		73,607,537	-	13,079,461	-	86,686,999
CFP/RHF		1,221,835	4%		1,221,835	-	208,063	-	1,429,898
HCVP		9,366,619	3%		9,040,261	326,358	1,539,443	55,575	10,961,637
Devel		-			-	-	-	-	-
HABCO		1,331,327	-8%			1,331,327		226,708	1,558,036
DHCD		-				-	-	-	-
Grants		3,200,613	41%			3,200,613	-	-	3,200,613
EPC		800,711	8%		660,164	140,547	116,766	23,933	941,411
Biz Activities		1,751,755	0%			1,751,755	-	298,302	2,050,056
		89,497,946	-2%		84,529,797	6,750,601	14,943,733	604,518	106,828,649
<i>Indirect</i>					(1,782,452)	-			
Admin Services	COCC	314,351	-15%	0.4%					
Audits	COCC	-	-100%	0.1%					
Budgets	COCC	532,145	44%	0.3%					
CAO	COCC	306,343							
CFO	COCC	529,102	-65%	0.9%					
Agency Wide	COCC			0.0%					
Communications	COCC	755,059	38%	0.4%					
Dep Exec Director/COO	COCC	608,307	4%	0.3%					
Executive Director	COCC	1,006,655	19%	0.6%					
Facilities/Bldg. Support	COCC	1,058,794	-11%	1.4%					
FHEO	COCC	687,237	-5%	0.6%					
Finance & Accounting	COCC	1,697,596	7%	1.5%					
HousingStat	COCC	-		0.0%					
Human Resources	COCC	1,514,947	18%	1.7%					
IT	COCC	2,075,803	9%	2.3%					
Inspector General	COCC	504,100	-5%	0.5%					
Legal - attorneys	COCC	1,606,747	23%	1.2%					
MPA		707,555		0.0%					
P&D	COCC	1,045,433	58%	0.0%					
Procurement	COCC	582,450	2%	0.6%					
Legacy costs	COCC			0.0%					
5% Salary Addback	COCC								
Anticipated cuts COCC	COCC	(292,250)							
Subtotal Indirect		15,240,374	8%	12.0%	14,090,831	1,149,542	15,240,374		
Indirect Rate		17.03%							
Program totals (Dir + Ind)		104,738,320	-1%						
Indirect Cost Rate (I/D) - blended				17.03%	17.03%	17.03%			
TOTAL		370,396,824	20%	100%	339,663,809	30,733,014			
<i>Reallocation of non-allocable overhead</i>					309%	28%			
					545,024	(545,024)			
Total Indirect Charges		15,240,374	8%	14.63%	14,635,856	604,518			
Total Program Indirect Rate					17.69%	8.96%			

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

Tot Exp. per FY18 Sources and Uses File	372,712,010								
Overall Proof	370,396,824								
Anticipated cuts	(2,074,702)								
Variance	240,484								
Final Variance	0.00%								

Anticipated cuts

Note -

RAD Deducts include budgets included in FY19 figures that should drop out in FY20, including Somerset, Mon East, Rosemont, Van Story, and Heritage.

Source files included:

FY19 sources and uses on the desktop and FY19 LIPH I&E on the desktop and various COCC dept pdf files Rob emailed me on Feb 15, 2019
 In addition to the LIPH I&E, there is \$660,164 for EPC soft costs, and \$1,650,000 for nonroutine AMP costs that are added in to tie back to the sources and uses file.

Appendix B: Certification of Compliance with Regulations

Appendix C: Board Resolution

Appendix D: Documentation of Public Process

(Includes Public Notice, Sign-in Sheets and Summary of Comments and Related Responses)

Appendix E: Lobbying Activities (SF-LLL) Form

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

Appendix F: Certification of Payments (HUD-50071) Form

**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. 03/31/2020)

Applicant Name

Housing Authority of Baltimore City

Program/Activity Receiving Federal Grant Funding

Moving to Work Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Janet Abrahams

Title

Executive Director

Signature

Date (mm/dd/yyyy)

09/19/2019

Previous edition is obsolete

form HUD 50671 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3