



HOUSING
AUTHORITY of
BALTIMORE CITY



FY 2021

MTW Annual Plan

**U.S. Department of Housing & Urban Development
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Moving to Work Annual Plan

Fiscal Year 2021

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Housing Authority of Baltimore City

Moving to Work Amended Annual Plan – Fiscal Year 2021

Table of Contents

| | | |
|------|---|----|
| I. | Introduction and Overview | 1 |
| | A. Background on the MTW Demonstration..... | 1 |
| | B. MTW Long-Term Goals and Objectives | 2 |
| | C. MTW Goals and Objectives for Fiscal Year 2021 | 3 |
| II. | General Housing Authority Operating Information | 8 |
| | A. Housing Stock Information | 8 |
| | B. Leasing Information | 37 |
| | C. Waiting List Information | 39 |
| III. | Proposed MTW Activities: ALL | 41 |
| | Activity #2021-01: Emergency Waivers | 41 |
| | Activity #2021-02: Special Homeownership Vouchers | 44 |
| | Activity #2021-03: Economic Stability, Growth and Transition Program for the Thompson Settlement Agreement | 47 |
| IV. | Approved MTW Activities: ALL..... | 52 |
| | A. Implemented Activities | 52 |
| | Activity #2006-01: Streamlined Recertification Process | 52 |
| | Activity #2006-02 Enhanced Project Based Voucher Program | 56 |
| | Activity #2006-03: Thompson Biennial Recertifications: BRHP..... | 58 |
| | Activity #2006-04: Family Self-Sufficiency Program Enhancements..... | 59 |
| | Activity #2007-01: Mobility Program Enhancements/Thompson | 60 |
| | Activity #2009-01: MTW Homeownership Program..... | 61 |
| | Activity #2010-01: Unit Sizes | 63 |
| | Activity #2010-02: Bailey Long-Term Affordable Project-Based Voucher Contract | 64 |
| | Activity #2010-03: Thompson Risk Based Inspections..... | 65 |
| | Activity #2012-01: Rent Simplification – Thompson | 66 |
| | Activity #2014-01: HABC Long-Term Affordable Project-Based Voucher Contract: | 67 |
| | Activity #2019-01: Rent Simplification | 68 |
| | Activity #2019-02: Local Fair Market Rent..... | 70 |

| | |
|--|-----|
| Activity #2020-4: Modified Rent Reasonableness & Rent Cap Policy | 71 |
| Activity #2020-5: The Bailey 10 Total Development Cost Limit Policy..... | 73 |
| B. Not Yet Implemented Activities..... | 74 |
| Activity #2020-1: Housing Quality Standards (HQS) Modifications & Enhancements | 74 |
| Activity #2020-02: The Healthy Opportunities Program | 78 |
| Activity #2020-03: Local Forms..... | 80 |
| C. MTW Activities on Hold..... | 84 |
| Activity #2009-02: Section 811 Supportive Housing..... | 84 |
| Activity #2012-02: Direct Homeownership Program..... | 84 |
| Activity #2018-01: Landlord Payment Methods and Electronic Communications..... | 85 |
| D. Closed-Out MTW Activities..... | 86 |
| V. Sources and Uses of MTW Funds..... | 92 |
| A. Estimated Sources and Uses of MTW Funds in FY 2021..... | 92 |
| B. Local Asset Management Plan (LAMP) | 96 |
| C. Rental Assistance Demonstration (RAD) Participation | 96 |
| VI. Administrative..... | 102 |
| A. Board Resolution and Certification of Compliance | 102 |
| B. Documentation of Public Process | 102 |
| C. Indirect Cost Rate and Local Asset Management Plan | 102 |
| D. Lobbying Disclosures..... | 102 |
| E. Certification of Payments..... | 102 |
| F. Planned and Ongoing Evaluations..... | 102 |

I. Introduction and Overview

This Moving to Work (MTW) Annual Plan provides information on the initiatives and strategies to be undertaken by the Housing Authority of Baltimore City (HABC) under the MTW Demonstration Program in Fiscal Year (FY) 2021, i.e. the period from January 1, 2021 through December 31, 2021.

HABC has been a participant in the MTW Program since 2005. The current MTW Agreement between HABC and the US Department of Housing and Urban Development (HUD), which defines the terms and conditions of HABC's participation, including the Annual Plan requirements, extends through December 31, 2028.

It is important to note that HABC receives the majority of its funding from HUD, which generally determines funding on a calendar year basis. As of the publication date of this MTW Annual Plan, HABC has not received notification of projected HUD funding amounts for calendar year 2021. In view of the uncertainty regarding available funding, the planned activities detailed in the MTW Annual Plan are subject to modification based on final funding levels.

A. Background on the MTW Demonstration

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

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

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

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

HABC in Fiscal Year 2021 are all designed to promote one or more of the MTW statutory objectives.

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

B. MTW Long-Term Goals and Objectives

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

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

- RESPOND:** Protecting the safety and well-being of our employees and the communities we serve as we continue to perform the critical work of agency; responding to the needs of our residents and program participants by connecting them to services and resources; strengthening our communities through redevelopment efforts that improve quality of life.

- RETURN:** Returning to regular operations while prioritizing safety and establishing objectives; assisting our residents as they navigate new and changing circumstances; maintaining our focus on HABC's mission and goals.

- REASSURE:** Assuring our staff and residents that we will equip them with the necessary tools to help them take care of themselves; keeping all stakeholders apprised of our plans and initiatives; providing our residents with information, resources and support; enhancing our communication efforts.

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

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

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

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

C. MTW Goals and Objectives for Fiscal Year 2021

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

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

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.

Voucher Utilization – HABC projects that, on average, it will have 19,117 units under lease each month, including Thompson and all other programs.

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

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

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

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

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

Proposed MTW Activities – HABC is proposing two (2) new MTW activities in FY 2021. Under the first activity, HABC will use its MTW authority to establish an Emergency Waivers activity in

response to economic and health related emergencies and natural disasters as declared by the Mayor or his/her designee including the authority to determine when to place and lift the waivers. This MTW activity will be used to waive certain requirements when completing reexaminations, and HQS inspections, when extending FSS Contract of Participation, or increasing payment standard under the Housing Choice Voucher Program (HCVP). The complete list of Emergency Waivers are described in detail under MTW Proposed Activity 2021-01 beginning on page 42.

The second activity will allow HABC to utilize MTW authority to create and fund a limited number of Special Homeownership Vouchers (SHV) for use by eligible low-income households who purchase a scattered site unit under HABC's MTW Section 32 Homeownership Plan. A third MTW activity is being proposed by the Baltimore Regional Housing Program (BRHP). BRHP is the organization that administers vouchers under the Thompson Settlement Agreement).

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

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

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

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

The Re-Entry Program: – This program links permanent housing with supportive services to assist up to 250 ex-offender households. Referrals are made to HABC by the Mayor’s Office of Homeless Services (MOHS). MTW Authority is not required for this initiative.

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

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

Notes on Thompson and Bailey Settlements

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

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

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

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

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

II. General Housing Authority Operating Information

A. Housing Stock Information

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

i. Planned New Public Housing Units

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

Table 1: Planned New Public Housing Units in FY 2021

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

Total Public Housing Units to be Added in the Plan Year

10

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

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

If “Population Type is “Other” please describe:

Other – Non-Elderly Disabled

ii. Planned Public Housing Units to Be Removed

As shown on Table 2, HABC plans to demolish and/or dispose of 1,022 units and 10 vacant lots in FY 2021. While Table 2 provides an estimate of the number of units to be removed from the public housing inventory during the Plan Year, the actual number may vary depending on the timetables for HUD and City of Baltimore approvals, project financing, RAD closings and other factors.

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

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

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

| PIC Dev.#/AMP and PIC Dev. Name | Number of Units to be Removed | Explanation for Removal |
|---------------------------------|-------------------------------|---|
| | | vouchers. The remaining 75% of the CN replacement units will be converted under RAD PBV. |
| MD002/004 Poe Homes | 288 | HABC will submit a disposition application to HUD for Poe Homes as part of the Poe Homes Transformation Plan. |
| MD002/0103 - Midtown Apartments | 1 | 922 N Calhoun St B To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 922 N Calhoun St A To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 925 N Carey St A To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 925 N Carey St B To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1213 Mosher St A To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1213 Mosher St B To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1319 Mosher St To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1605 Riggs Av To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1623 Mosher St A To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1623 Mosher St B To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1627 Mosher St A To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1627 Mosher St B To be sold to the Mayor and City Council for FMV. |
| MD002/0103 - Midtown Apartments | 1 | 1830 Riggs Av To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 913 N Calhoun St A To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 913 N Calhoun St B To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 915 N Calhoun St A To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 915 N Calhoun St B To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 917 N Calhoun St A To be sold to the Mayor and City Council for FMV. |

| PIC Dev.#/AMP and PIC Dev. Name | Number of Units to be Removed | Explanation for Removal |
|--|-------------------------------|---|
| MD002/0108 - Uptown Apartments | 1 | 917 N Calhoun St B To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 920 N Gilmor St A To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 920 N Gilmor St B To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 921 N Calhoun St To be sold to the Mayor and City Council for FMV. |
| MD002/0108 - Uptown Apartments | 1 | 1011 N Monroe St To be sold to the Mayor and City Council for FMV. FMV. |
| MD002/0108 - Uptown Apartments | 1 | 1152 N Stricker St To be sold to the Mayor and City Council for FMV. FMV. |
| MD002/0108 - Uptown Apartments | 1 | 1344 N Carey St To be sold to the Mayor and City Council for FMV. FMV. |
| MD002/0108 - Uptown Apartments | 1 | 1415 Mosher St To be sold to the Mayor and City Council for FMV. FMV. |
| MD002/0108 - Uptown Apartments | 1 | 1449 N Carey St To be sold to the Mayor and City Council for FMV. FMV. |
| MD002/0108 - Uptown Apartments | 1 | 1800 Presbury St To be sold to the Mayor and City Council for FMV. FMV. |
| MD002/0108 - Uptown Apartments | 1 | 1808 Presbury St To be sold to the Mayor and City Council for FMV. FMV. |
| MD002/0109 -Stricker Street Apartments | 1 | 1150 N Carrollton Av To be sold to the Mayor and City Council for FMV. |
| MD002/0109 -Stricker Street Apartments | 1 | 1306 N Carey St To be sold to the Mayor and City Council for FMV. |
| MD002/0109 -Stricker Street Apartments | 1 | 1323 Mosher St To be sold to the Mayor and City Council for FMV. |
| MD002/0109 -Stricker Street Apartments | 1 | 1718 W Presstman St To be sold to the Mayor and City Council for FMV. |
| MD002/0200 -Scattered Sites | 1 | 404 N Bradford St To be sold to the Mayor and City Council for FMV. |
| MD002/0200 -Scattered Sites | 1 | 702 N Bradford St To be sold to the Mayor and City Council for FMV. |
| MD002/0200 -Scattered Sites | 1 | 705 Mura St To be sold to the Mayor and City Council for FMV. |
| MD002/0200 -Scattered Sites | 1 | 707 Mura St To be sold to the Mayor and City Council for FMV. |
| MD002/0200 -Scattered Sites | 1 | 711 Mura St To be sold to the Mayor and City Council for FMV. |
| MD002/0200 -Scattered Sites | 1 | 713 Mura St To be sold to the Mayor and City Council for FMV. |
| MD002/0200 -Scattered Sites | 1 | 715 Mura St To be sold to the Mayor and City Council for FMV. |

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

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

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

| PIC Dev.#/AMP and PIC Dev. Name | Number of Units to be Removed | Explanation for Removal |
|---------------------------------|-------------------------------|---|
| MD002/0203 -Scattered Sites | 1 | 214 S Fulton Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 301 S Franklinton Rd To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 313 N Fulton Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 546 N Payson St To be sold to the Mayor and City Council. |
| MD002/0203 -Scattered Sites | 1 | 1717 N Smallwood St To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 1734 W Lexington St To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 2116 Presbury St To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 2227 W Baltimore St A To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 2227 W Baltimore St B To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 2428 W Franklin St To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 2712 Prospect St To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 2817 Waldorf Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 3012 Oakley Av To be sold to the Mayor and City Council for FMV.. |
| MD002/0203 -Scattered Sites | 1 | 3030 Baker St To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 3907 Park Heights Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 4108 Park Heights Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 4204 Park Heights Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 4206 Park Heights Av To be sold to The Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 4918 Palmer Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 5318 Beaufort Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 5326 Beaufort Av To be sold to the Mayor and City Council for FMV. |
| MD002/0203 -Scattered Sites | 1 | 5330 Beaufort Av To be sold to the Mayor and City Council for FMV. |

| PIC Dev.#/AMP and PIC Dev. Name | Number of Units to be Removed | Explanation for Removal |
|---------------------------------|-------------------------------|--|
| MD002/0203 -Scattered Sites | 1 | 2126 Druid Hill Avenue. To be sold to a third-party purchaser. |
| TOTAL NUMBER OF UNITS | 1,022 | |

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

HABC plans to enter into an Agreement to Enter into Housing Assistance Payment (AHAP) Contracts for 50 new project-based units in FY 2021, as shown in Table 3. HABC anticipates one property with 48 units going through RAD PBV conversions in 2021. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the HABC Board during the Plan Year, HUD RAD processing timetables and other considerations.

Table 3: Planned New Project-Based Vouchers

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

iv. **Planned Existing Project-Based Vouchers**

HABC will continue to provide voucher-based operating support for a large portfolio of existing units under contract in the PBV program or units for which an Agreement to Enter into Housing Assistance Payments (AHAP) Contract is in place. Table 4 provides details on those PBV developments that are currently under contract, and projects which HABC anticipates will be

under contract throughout FY 2021. As noted, there are 2,325 units in this category. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the HABC Board during the Plan year, HUD RAD processing timetables and other considerations.

Table 4: Planned Existing Project-Based Vouchers

| Property Name | Number of Project-Based Vouchers | Planned Status at End of FY 2021 | RAD? | Description of Project |
|----------------------------------|----------------------------------|----------------------------------|------|---|
| 18 W. Read St., Inc. | 10 | Leased/Issued | No | 10 1bd NED units at 18 W. Read St. |
| 1234 McElderry St | 50 | Committed | No | 13 1bd, 24 2bd and 13 3bd units for PH replacement at 1234 McElderry St. |
| 214 E. Biddle St. | 5 | Leased/Issued | No | 5 1bd NED units at 214 E. Biddle St. |
| 2301 N. Charles St., Inc. | 7 | Leased/Issued | No | 2 efficiencies and 5 1bd NED/UFAS units at 2301 N. Charles St. |
| Alcott Place | 28 | Leased/Issued | No | 28 1bd units at 2702 Keyworth Ave. |
| Artaban Ashburton Apartments | 14 | Leased/Issued | No | 14 1bd NED units at 5906 Park Heights Ave. |
| Ashland Commons | 12 | Leased/Issued | No | 12 1bd (8-NED) units at 1715 E Eager St. |
| Barclay | 19 | Leased/Issued | No | 1 1bd, 1 2bd, and 17 3bd (1-NED, 4-UFAS) units at 2106-2234 Barclay St. |
| Barclay II (North Barclay Green) | 15 | Leased/Issued | No | 11 1bd NED and 4 2bd UFAS units at 341 E. 20 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. |
| Belleveu 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. |

| Property Name | Number of Project-Based Vouchers | Planned Status at End of FY 2021 | RAD? | Description of Project |
|----------------------------|----------------------------------|----------------------------------|------|---|
| 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 Eilerslie Ave. |
| Clarks Lane | 6 | Leased/Issued | No | 6 1bd NED units at 3901 Clarks Ln. |
| Clarksview, LLC | 8 | Leased/Issued | No | 8 1bd NED units at 3701-3711 Clarks Ln. |
| Coel-Grant Higgs | 57 | Leased/Issued | No | 32 efficiencies and 25 1bd (6-UFAS) units at 1700 N Gay St. |
| Coleman Manor | 49 | Leased/Issued | No | 49 1bd (8-NED, 5-UFAS) units at Walbrook Ave. |
| Columbus School Apts. | 8 | Leased/Issued | No | 8 1bd units at 2000 E North Ave |
| Community Housing | 6 | Leased/Issued | No | 1 efficiency, 1 1bd, 1 2bd, and 3 3bd scattered site units |
| Dayspring | 18 | Leased/Issued | No | 17 2bd and 1 3bd transitional units at 1125 Patterson Park |

| Property Name | Number of Project-Based Vouchers | Planned Status at End of FY 2021 | RAD? | Description of Project |
|----------------------------------|----------------------------------|----------------------------------|------|---|
| 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. |
| Four Ten Loft Apts | 20 | Committed | No | 20 - 1bd units at 410 N Eutaw St. |
| Franklin Flats | 7 | Leased/Issued | No | 7 1bd NED units at 20 E. Franklin St. |
| Greenmount & Chase | 19 | Committed | No | New Construction of 60 units located in the Johnston Square neighborhood at Greenmount Ave., Chase and Proctor Streets, of which 19 will be project based |
| Greens at Irvington Mews | 20 | Leased/Issued | No | 20 - 1bd NED units at 4300 Frederick Ave. |
| 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. |

| Property Name | Number of Project-Based Vouchers | Planned Status at End of FY 2021 | RAD? | Description of Project |
|----------------------------|----------------------------------|----------------------------------|------|--|
| Independence Place | 21 | Leased/Issued | No | 11 1bd and 10 2bd units designated for chronically homeless households at 4101½ Old York Rd. |
| Irvington Woods | 57 | Leased/Issued | No | 11 1bd NED and 46 2bd units at 4102-4126 Potter St. |
| JByrd | 3 | Leased/Issued | No | 3 1bd NED units at Windsor Mill Rd. |
| Jenkins House | 22 | Leased/Issued | No | 20 SRO and 2 1bd units at 2226 Maryland Ave. |
| John Manley House | 5 | Leased/Issued | No | 5 1bd NED units at 5304 Harford Rd. |
| Keys Pointe – Phase 1B | 34 | Leased/Issued | No | 19 1bd, 8 2bd, 4 3bd and 3 4bd (11-NED, 4-UFAS) units at Cardiff, Jarmon, Hornell, Boston and Gallop Streets |
| L on Liberty | 14 | Leased/Issued | No | 14 1bd (all NED) units at 216 N Liberty St. |
| Lillian Jones Apts. | 22 | Leased/Issued | No | 14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303 Greenmount Ave. |
| M on Madison | 23 | Leased/Issued | No | 23 1bd NED units at 301 W. Madison St. |
| Marian House | 8 | Leased/Issued | No | 4 SRO and 4 3bd units at 949 Gorsuch Ave. |
| Marian House II | 5 | Leased/Issued | No | 5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave. |
| Mary Harvin Center | 8 | Leased/Issued | No | 8 1bd units at 1600 N. Chester St. |
| Metro Heights at Mondawmin | 18 | Leased/Issued | No | 13 1 bd, 2 2bd and 3 3 bd (10-NED, 1-UFAS) units, some designated for chronically homeless households at 2700 Reisterstown Rd. |
| Milford Station | 6 | Leased/Issued | No | 6 1bd NED units at 3900 W. Northern Pkwy. |
| Moravia | 60 | Leased/Issued | No | 57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr. |
| Mount Royal Apts. | 5 | Leased/Issued | No | 5 1bd units at 1512 W. Mt. Royal Ave. |
| Mulberry at Park Apts. | 19 | Leased/Issued | No | 11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St. |

| Property Name | Number of Project-Based Vouchers | Planned Status at End of FY 2021 | RAD? | Description of Project |
|-------------------------|----------------------------------|----------------------------------|------|--|
| 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 | 82 | Leased/Issued | No | 41 efficiencies and 41 1bd units at 116 N. Paca St. 63 units are designated for homeless and 19 units for veteran populations. |
| Parktown-Cason Arms | 12 | Leased/Issued | No | 8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave. |
| Penn North | 15 | Leased/Issued | No | 14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave. |
| Penn Square II | 15 | Leased/Issued | No | 12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave. |
| Parkwood | 3 | Leased/Issued | No | 3 1bd NED units at scattered sites |
| Poppleton II | 15 | Leased/Issued | No | 11 1bd NED units and 4 3bd UFAS units at 838 W. Fairmount Ave. |
| Poppleton III | 10 | Leased/Issued | No | 7 1bd NED units, 1 2bd UFAS and 2 3bd UFAS units at 866 W. Fayette St. |
| Pratt Street | 35 | Leased/Issued | No | 27 2bd and 8 3bd units at 1700 W Pratt St. – transitional housing |
| Restoration Gardens | 43 | Leased/Issued | No | 40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave. |

| Property Name | Number of Project-Based Vouchers | Planned Status at End of FY 2021 | RAD? | Description of Project |
|--|----------------------------------|----------------------------------|------|---|
| Restoration Gardens II | 42 | Leased/Issued | No | 42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd. |
| Seminole Apartments | 6 | Leased/Issued | No | 6 1bd NED units at 4300 Seminole Ct. |
| Sharon Towers | 10 | Leased/Issued | No | 10 2bd units at 4-6 N. Carey St. |
| Sharp Leadenhall | 4 | Leased/Issued | No | 4 1bd units (3-UFAS) at Race and West Streets |
| Sojourner at Argyle Apartments | 12 | Leased/Issued | No | 12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St. |
| St. Stephens | 15 | Leased/Issued | No | 15 1bd NED units at 3900 Roland Ave. |
| St. Vincent DePaul | 9 | Leased/Issued | No | 8 2bd and 1 3bd units at Ulman Ave. |
| St. Vincent DePaul | 5 | Leased/Issued | No | 1 3bd and 4 4bd units designated for chronically homeless households at Bond St. and Cottage Ave. |
| Symphony Home at Purdue | 6 | Leased/Issued | No | 6 1bd units at 5683 Purdue Ave. |
| Union Ave. – Buena Vista Apartments | 48 | Leased/Issued | Yes | 15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave. |
| Uplands | 62 | Leased/Issued | No | 24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln. |
| Walbrook Mills Apts | 1 | Leased/Issued | No | 1 3bd (UFAS) unit at 2636 W North Ave. |
| Wayland Village | 45 | Leased/Issued | No | 45 1bd (14-NED) units at 3020 Garrison Blvd. |
| Weinberg Family Center – 1209 Rose | 8 | Leased/Issued | No | 5 2bd and 3 3bd units designated for chronically homeless households at 1209 N. Rose St. |
| Weinberg Family Center – Guadenzia at Park Heights | 18 | Leased/Issued | No | 14 2bd and 4 3bd units designated for chronically homeless households at 4613 Park Heights Ave |
| Weinberg Manor East | 75 | Leased/Issued | No | 10 SRO, 41 efficiencies, and 24 1bd units (10-NED, 5-UFAS) at 3601 Fords Ln. |

| Property Name | Number of Project-Based Vouchers | Planned Status at End of FY 2021 | RAD? | Description of Project |
|----------------------|----------------------------------|----------------------------------|------|---|
| 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 | 2,325 | | | |

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

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

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

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

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

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

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

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

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

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

HABC will implement a wide range of capital investments at existing public housing sites and continue its program of citywide housing development activities as summarized on Table 5. Additional discussion of capital plan, energy, infrastructure and extraordinary maintenance issues and initiatives is included below. As summarized in Table 5, HABC projects it will expend a total of approximately \$48.8 million on capital-related activities in FY 2021. Actual projects, timetables and expenditures may vary. HABC may modify its planned capital expenditures during the Plan year based on changing priorities, emergency conditions and other factors. Pursuant to the MTW Agreement, HABC has combined all current and prior year Capital Funds, including RHF funds, into the MTW Block Grant that will be carried out in accordance with all HUD regulations, including 24 CFR Part 905, and other requirements applicable to the Capital Fund Program.

Table 5: Planned Capital Expenditures During the Plan Year

| No. | Development Name | Description of Work | FY 2021 Planned Expenditures |
|-----|------------------|--|------------------------------|
| 1. | Latrobe Homes | EMCS Building Control Panel Relocation, Concrete Repairs | 550,000 |
| 2. | McCulloh Homes | Exterior Door Replacement, Heating system upgrade (McCulloh Homes Extension Electrical Supplemental), Efficient Interior Lighting, Electric Meters | 1,525,631 |

| No. | Development Name | Description of Work | FY 2021 Planned Expenditures |
|-----|-------------------|--|------------------------------------|
| | | & Tenant Surcharges, Misc - Gas Piping Infrastructure, Photovoltaic Power Generation (PV) | |
| 3. | Perkins Homes | Emergency Repairs, Relocation Activities, Redevelopment of Phase III (Perkins 1) 94 Units | 3,270,184 |
| 4. | Poe Homes | Emergency Repairs, Renovate Unit to Resident (504 compliant) Meeting Space, Relocation Activities, Extraordinary Maintenance | 1,175,000 |
| 5. | Douglass Homes | Concrete Repairs to Porches and Sidewalks, Install Sump Pumps, Risk Reduction/Abatement (Community Building and Units), Electric Meters & Tenant Surcharges, Efficient Interior Lighting, Cogeneration (CHP) Units; Lead based paint grant initiatives | 2,124,595 |
| 6. | Gilmor Homes | Boilers and Steam Distribution System Upgrades, Site Improvements, Condensate Units and Sump Pumps Installations, Boiler and DHW System Upgrade, Boiler Room Office Upgrade, remaining demolition and re-routing of utilities | 3,943,366 |
| 7. | O'Donnell Heights | Emergency Repairs, Street lighting , Building lighting, and Pole Lighting; electrical distribution system assessment, and component repairs and/or replacements | 350,000 |
| 8. | Cherry Hill | Roof Replacement (Maintenance Shop), Install Sump Pumps, Re-Pipe Heat Exchangers, heating distribution system pipe replacement | 1,535,856 |
| 9. | Brooklyn Homes | Electrical Distribution Replacement, Install Window Security Screens | 2,058,550 |

| No. | Development Name | Description of Work | FY 2021 Planned Expenditures |
|-----|------------------------------------|---|------------------------------------|
| 10. | Westport | Window Replacement, Parking Lot, Install Security System w/ Cameras, Erosion Control, Repair Concrete Steps on Grounds and Unit, Site Road Repairs, Daycare Building Demolition | 2,152,481 |
| 11. | Mt. Winans | Basements Condensation, Install Efficient Interior Lighting, Install Electric Meters & Tenant Surcharges, Install Natural Gas Meters & Tenant Surcharges, Install Water Meters & Tenant Surcharges, Photovoltaic Power Generation (PV) | 306,883 |
| 12. | Rosemont | Emergency Repairs | 100,000 |
| 13. | Dukeland | Emergency Repairs | 50,000 |
| 14. | Somerset Ext | Redevelopment Phase II (Somerset 2) 197 Units, Phase IV (Somerset 3) 64 Units | 3,882,890 |
| 15. | Scattered Sites | Roofing Replacement, Vacancy Renovation, Basement Waterproofing, Window Replacement, Limited Lead-Free Painting, Emergency Repairs, Metering, Installing Water Fixtures, Installing Thermostats, Lighting, Replace Water Heaters, Furnaces, Refrigerators, Stoves | 8,806,886 |
| 16. | Authority-Wide | Replace Kitchen Cabinets, Countertops, Bathrooms Cabinets and Sinks, Replace Windows, Electrical Work, Mechanical Work, Non-Dwelling Structures, Management and Maintenance Facilities Improvements, Vacancy Renovation, Install Playground, Site Improvements | 4,451,417 |
| 17. | NEDS | Incentives for Non-Elderly Disabled Units (Bailey 10) | 1,407,385 |
| 18. | AHI | Affordable Home Ownership (BRHP) | 1,458,767 |
| 19. | Arbor Oaks, Townes at The Terraces | RAD Subsidy | 209,415 |

| No. | Development Name | Description of Work | FY 2021 Planned Expenditures |
|--------------------|--|---|------------------------------------|
| 20. | Latrobe, Poe Homes, Gilmor Homes, Cherry Hill Homes, Brooklyn Homes, Westport(EPC 1 Sites) | Sub Metering Maintenance and Service | 40,000 |
| 21. | Authority-Wide | A & E and Environmental Consulting Fees | 220,000 |
| 22. | Authority-Wide | Legal, Planning, Information Technology and Utility Consulting Fees, etc. | 1,767,081 |
| 23. | Central Office | Technical Salaries and Benefits | 1,376,383 |
| 24. | Central Office | Non-Technical Salaries and Benefits | 1,471,543 |
| 25. | Central Office | Resident Meetings and Training | 41,250 |
| 26. | Central Office | Admin and Operating Costs, Overhead, Sundry and Audit Fees | 532,389 |
| 27. | Central Office | Debt Service - 1st Phase EPC | 3,993,667 |
| GRAND TOTAL | | | 48,801,619 |

Planned Capital Expenditures During the Plan Year

504 Accessibility Improvements

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

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

Infrastructure and Extraordinary Maintenance

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

Major initiatives planned in FY 2020 to be completed in FY 2021 are the site improvement and/or development in the areas at Gilmor Homes as a result of the demolition of six walkup buildings; the window repairs/replacement at McCulloh Homes; the installation of sump pumps in crawl spaces at various developments; upgrades to the Gilmor boiler and heating/hot water distribution system; site backflow preventers at McCulloh Homes; upgrade to the supplemental electrical baseboard heat at McCulloh Homes Extension (townhomes) ; the replacement and/or upgrade to critical components of the overhead electrical distribution system at O'Donnell Heights; additional building, street and pole lighting at O'Donnell Heights; the conversion of a unit at Poe Homes into a 504 compliant resident meeting space; roof replacement of the maintenance shop at Cherry Hill Homes; heating system upgrades to include heating distribution pipe replacement and re-piping heat exchangers at Cherry Hill; window replacement project and the replacement of a roof top air conditioning unit at Westport Homes; and mitigation of basement condensation at Mt Winans.

Additionally, major project work underway or planned in FY 2020 to be completed in FY 2021 includes the continuation of the demolition/deconstruction of six apartment style walk-up buildings (132 units) , subsequent re-routing of utilities serving Gilmor Homes and the redevelopment of the open space with the assistance of state demolition grant funding; window replacement at Gilmor Homes; the replacement of roofs at various scattered sites; and the continuation of lease hold improvements at the Benton Building and at 709 E. Eager St. (including designing and constructing a parking lot for employees and program participants) due to staffing and reorganization efforts; heating, electrical and structural upgrades at the Duncanwood facility ;the installation domestic hot water generators and a combined heat power(CHP) system at Douglass homes; replacement of the exterior building electrical cabinets at various

developments; upgrading lighting in crawlspaces at various developments; paving and concrete repairs at O'Donnell Heights and Brooklyn Homes; landscaping, site work and erosion control at Cherry Hill; and the replacement of Heating, Ventilation and Air Conditioning units (HVAC) as needed at Cherry Hill 17; and the replacement of exterior doors and the installation of additional security screens at Brooklyn Homes.

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

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

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

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

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

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

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

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

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

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

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

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

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

Energy Hotline(via phone) and Energy email to communicate questions, issues and concerns to a central location.

Safety & Security Initiatives

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

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

This partnership also seeks opportunities to apply for private and governmental grants for the implementation of new cameras and security lighting at all sites. HABC will apply for the 2020 Department of Housing Safety and Security Grant for Douglass Homes. The grant typically covers the installation of security cameras, security lighting and some fiber optic cable installation. The work is critical to fighting and deterring crime in key areas at HABC developments. Fiber installations are being evaluated for possible implementation at all sites to increase data connectivity/reliability and camera operations. A security operations center is being scoped, designed and constructed in 2021 to include multiple monitors, server storage and connectivity to all of HABC’s CCTV Cameras and related systems.

Facilities & Real Estate

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

HABC will renovate space in the Benton Building to house a command center for the management of Security Operations across HABC developments and facilities. HABC is also reviewing the viability of the community building at Brooklyn Homes.

Development Initiatives

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

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

[O'Donnell Heights](#)

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

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

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

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

[Bailey Supplemental Decree Units](#)

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

[Thompson Settlement Agreement](#)

Under the Thompson Settlement Agreement, the Baltimore Regional Housing Partnership (BRHP) is continuing the project-based development program that was started under the Thompson partial consent decree. BRHP is implementing a project-based development program to create project-based units in Communities of Opportunity. Subject to funding availability, BRHP is making pre-development funding and, if needed, subordinate secondary financing using the Urban Revitalization Demonstration Grant funds awarded for the Homeownership Demonstration Program (MD-06-URD-002-I294), available to pre-qualified developers and property owners who develop housing units and agree to enter into long term project-based voucher contracts. BRHP committed funding for 54 units in FY 2019. Under this initiative, BRHP's goal is to create 30 new project-based units in Communities of Opportunities in FY 2020 twenty (20) of which will be located in scattered sites units in high-opportunity areas throughout the region and the remaining ten (10) units are planned as part of the new construction being built in Towson, Maryland called Red Maple Place. Red Maple Place will contain 56 units, 10 of which will have BRHP project-based units.

[Hollander Ridge HOPE VI Project](#)

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

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

The mixed-finance closing occurred in the 2nd quarter 2020 and early start of the rehab of Hollander Ridge properties began in February 2020. All units are expected to be completely

renovated and leased up by the 1st quarter 2021. HABC plans to convert the 94 Hollander Ridge units to project-based rental assistance under RAD in 2021.

[Perkins Somerset and Oldtown Transformation Plan](#)

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

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

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

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

2020, followed by the projected financial closings for Somerset 2 in November of 2020 and Somerset 3 in December 2020.

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

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

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

[Poe Homes](#)

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

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

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

As of this writing, HUD sent an initial response to HABC with clarification questions about the 5 proposals. Overall, HUD is pleased and intrigued by the proposals (see below for a brief

description of each proposal). HABC anticipates a final determination from HUD on grant awards by December 2020:

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

B. Leasing Information

i. Planned Number of Households Served

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

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

| Planned Number of Households Served Through: | Planned Number of Units Months Occupied/Leased | Planned Number of Households to be Served |
|--|--|---|
| MTW Public Housing Units | 65,436 | 5,453 |
| MTW Housing Choice Vouchers (HCV) Utilized* | 177,252 | 14,771 |
| MTW Thompson Housing Choice Vouchers** | 52,152 | 4,346 |
| 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 | 294,840 | 24,570 |

*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 2021. This table is not a requirement of Attachment B to the Standard MTW Agreement.

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

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

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

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

Table 8: Anticipated Issues and Possible Solutions Related to Leasing

| Housing Program | Description of Anticipated Leasing Issues and Possible Solutions |
|--------------------|--|
| MTW Public Housing | <p>HABC has undertaken several initiatives to decrease applicants’ time on the waiting list and therefore lease families faster and more efficiently.</p> <p>HABC updated its Interactive Voice Response System (IVRS). Now, applicants who call HABC cannot only find out the status of their</p> |

| Housing Program | Description of Anticipated Leasing Issues and Possible Solutions |
|----------------------------|--|
| | <p>public housing application, they will also be able to speak with an Account Review Specialist if they have additional questions.</p> <p>Leasing numbers decreased during 2020 due to COVID-19. Few families moved out and during the shutdown very few families were leased. Once COVID-19 waivers are lifted and PHA's are able to complete evictions, anticipated vacancies will negatively influence the number of families served for the year. HABC is currently making extreme efforts to place residents on payment plans in order to mitigate the effects of the pandemic.</p> <p>Lastly, HABC signed a Memorandum of Understanding (MOU) with the Baltimore City Police Department. Under the MOU, HABC is able to obtain more police reports concerning criminal activity on public 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 14,800 (this funding limitation does not affect Thompson- MTW, HUD-VASH, New Construction or Moderate Rehabilitation vouchers). Uncertainty concerning the level of available HAP funding to be provided to HABC for CY 2021 is an additional contributing factor in determining projected utilization. |

C. Waiting List Information

i. Waiting List Information Anticipated

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

Table 9: Waiting List Information Anticipated

| Waiting List Name | Description | Number of Households on Waiting List | Waiting List Open, Partially Open or Closed | Plans to Open the Waiting List During the Plan Year |
|----------------------------------|----------------|--------------------------------------|---|--|
| Federal MTW Public Housing Units | Community Wide | 10,505 | Closed | No. The Public Housing waiting list was closed on 12/20/19. There are no plans to open it in 2021. |

| Waiting List Name | Description | Number of Households on Waiting List | Waiting List Open, Partially Open or Closed | Plans to Open the Waiting List During the Plan Year |
|---|------------------|--------------------------------------|---|---|
| Federal MTW Housing Choice Voucher Units: Tenant-Based | Community Wide | 20,513 | Closed | No. There are no plans to open this waiting list in FY 2021. |
| Federal MTW Housing Choice Voucher Units: Project-Based | Site-Based | 6,473 | Partially Open | HABC opened the Senior PBV Waiting list on 10/05/20, which will remain open through 06/30/21. |
| RAD Choice Mobility | Program Specific | 3,714 | Open | N/A |
| Thompson Vouchers ** | Program Specific | 13,812 | Closed | No |

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

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

Describe any duplication of applicants across waiting lists:

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

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

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

III. Proposed MTW Activities: ALL

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

Activity #2021-01: Emergency Waivers

Description of MTW Activity

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

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

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

resume self-inspections beginning with the units which were inspected on the oldest date. This waiver applies to the PH program.

9. **FSS Contract of Participation:** HABC will waive the requirement regarding the maximum extension of an FSS Contract of Participation (COP). During periods of declared emergency, HABC may extend a family’s COP, using the declared emergency as good cause of the need for extension. For households who were already in the two-year extension period when the emergency was declared, HABC may extend their COP beyond the two year extension threshold. This waiver applies to the PH and HCV FSS program.

Statutory Objective

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

Implementation

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

Metrics

| CE #1: Agency Cost Savings * | | | | |
|---|--|---|---------|---------------------|
| Unit of Measurement | Baseline* | Benchmark* | Outcome | Benchmark Achieved? |
| Total cost of task in dollars (decrease) | \$347,196 15,168 hours x \$22.89/hour | \$173,598 7,584 hours x \$22.89/hour | | |
| *The baseline reflects the cost of completion of all PH and HCV regular reexaminations for a one-year period. The benchmark reflects the cost of completion of one-half the number of PH and HCV regular reexaminations in a one-year period. | | | | |
| CE #2: Staff Time Savings | | | | |
| Unit of Measurement | Baseline* | Benchmark* | Outcome | Benchmark Achieved? |
| Total time to complete the task in staff hours (decrease). | 15,168 10,112 recerts x 1.5 hours | 7,584 5,056 recerts x 1.5 hours | | |

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

Need/Justification for MTW Flexibility

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

Activity #2021-02: Special Homeownership Vouchers

Description of MTW Activity

HABC will utilize MTW authority to create and fund a limited number of Special Homeownership Vouchers (SHV) for use by eligible low-income households who purchase a scattered site unit under HABC's MTW Section 32 Homeownership Plan. SHVs will differ from regular Housing Choice Voucher (HCV) Program vouchers in the following respects:

Eligibility – Eligibility for SHVs will be limited to low-income households participating in, and meeting the income and other criteria of, HABC's MTW Section 32 Homeownership Plan who are planning to purchase a scattered site unit from HABC or its authorized Purchase and Resale Entities. These households may be public housing residents, HCV participants or applicants from the public housing or HCV waiting lists. Households receiving an SHV are not eligible for a soft second mortgage through the MTW Section 32 Homeownership program.

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

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

Utility Allowances – SHV participants will not be eligible for utility allowances.

Housing Assistance Payments – SHV participants will be required to pay at least 30% of adjusted household income as family share (total tenant payment) towards monthly homeownership

costs. SHV assistance will be applied to the first mortgage payment balance after factoring in the family share. To promote affordability of first time buying among very low-income households, HABC may pay the higher of the applicable HCV voucher payment standard or total monthly homeownership expenses, less the family share.

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

Statutory Objective

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

Implementation Schedule

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

Metrics

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

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

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 the activity (increase) | 0 | 5 | | |

Cost Implications

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

Need/Justification for MTW Flexibility

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

Rent Reform/Term Limit Information

Not applicable.

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

Description of MTW Activity

BRHP will develop an the Economic Stability, Growth and Transition Program for the Thompson Settlement Agreement which modifies and builds on the FSS model. The program will be structured using a multi-tract incentive model. In this model, milestones will be categorized into four tracks: education, career, financial health, and homeownership. Each track has specific eligibility criteria and participants will be able to choose which track(s) to participate in, depending on eligibility and funding availability. Participating families will commit to a three-to-five-year contract of participation in which achievement of individual family goals are incentivized through one-time payments disbursed contemporaneous with completion of the goal, and/or on-going payments deposited into an escrow or similar account that may be accessed through interim disbursements, or upon the successful completion of the contract. Payments to escrow accounts will occur when individual goals are achieved and verified by the program, incentive payment amounts are listed in the table below. Contracts of participation will require a recertification or interim recertification to have occurred within the prior 60 days, and will require an individual training plan to document goals and participant action items. This multi-track approach will build flexibility to meet varying needs of the families served and is intended to both promote financial stability and growth, and to provide a smooth transition to homeownership for families who have attained the means to successfully end their subsidy. Through greater numbers of families successfully exiting the program, new families from the waitlist may be served, in greater numbers.

The general parameters for incentive payments are as follows:

| Track | Incentive* | Goal |
|-------------------------|------------|---|
| Education | \$300-500 | Completion of GED, post-secondary degree, or career certification |
| | \$300 | Completed semester or quarter for completion of full-time post-secondary or career training |
| Education | \$500 | Establishment of college savings plan (529) |
| | \$300 | School continuity credit for children completing all grade levels at a single school (e.g., k-5,6-8,9-12) |
| Career | \$300 | Completion of first month of full-time employment, 4 months of full-time employment, or after an increase in wage income greater than 20% |
| | \$200 | Monthly escrow contribution after month 4 of full-time employment with ongoing full-time employment |
| Financial Health | \$200 | On-time tenant rent payments for a year |
| | \$50 | Attendance at Financial Health workshop |

| | | |
|-------------------------|-------------|---|
| Financial Health | \$500 | Achieving credit score milestone |
| | \$250-1,000 | Reaching savings milestones from \$,2500-\$10,000 |
| Homeownership | \$1,000 | Completion of accredited homebuyer education course and savings of at least \$2,000 |
| | \$5,000 | Closing cost or down payment assistance provided at closing. |

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

Statutory Objective

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

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

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

Implementation Schedule

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

Metrics

| <i>CE #6: Reducing Per Unit Subsidy Costs for Participating Households</i> | | | | |
|--|----------|-----------|---------|---------------------|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| | | | | |

| | | | | |
|---|-----------------|-----------------------|----------------|----------------------------|
| Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease). | \$1,620 | \$1,300 | | |
| SS #1: Increase in Household Income | | | | |
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Average earned income of households affected by this policy in dollars (increase). | \$0 | \$16,806 | | |
| SS #2: Increase in Household Savings | | | | |
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Average amount of savings/escrow of households affected by this policy in dollars (increase). | \$0 | \$300 | | |
| SS#3: Increase in Positive Outcomes in Employment Status | | | | |
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Employed Full- Time | 0 | TBD at Program Launch | | |
| Employed Part-Time | 0 | TBD at Program Launch | | |
| Unemployed | 0 | TBD at Program Launch | | |

| | | | | |
|-------------------------------|---|-----------------------|--|--|
| Enrolled in Education Program | 0 | TBD at Program Launch | | |
| Enrolled in Job Training | 0 | TBD at Program Launch | | |

SS #5: Households Assisted by Services that Increase Self Sufficiency

| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
|--|----------|-----------|---------|---------------------|
| Number of households receiving services aimed to increase self sufficiency (increase). | 0 | 150 | | |

SS #6: Reducing Per Unit Subsidy Costs for Participating Households

| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
|---|----------|-----------|---------|---------------------|
| Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease). | \$1,620 | \$1,300 | | |

SS #8: Households Transitioned to Self Sufficiency

| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
|---|----------|-----------|---------|---------------------|
| Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in | 0 | 15 | | |

| Section (II) Operating Information in the space provided. | | | | |
|---|----------|-----------|---------|---------------------|
| HC #3: Decrease in Wait List Time | | | | |
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Average applicant time on wait list in months (decrease). | 63 | 75 | | |
| HC #5: Increase in Resident Mobility | | | | |
| 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). | 135 | 150 | | |

Cost Implications

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

Need/Justification for MTW Flexibility

BRHP will utilize the authorization provided to HABC in Attachment C, Section E which waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R. 984 as necessary to implement the Agency’s Annual MTW Plan.

IV. Approved MTW Activities: ALL

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

A. Implemented Activities

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

Plan Year Approved, Implemented, Amended

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

Description/Update

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

Triennial Recertification

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

Annual Recertification

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

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

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

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

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

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

Planned Non-Significant Changes:

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

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

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

| 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 | | |
| *The baseline reflects pre-RAD conversions and therefore represents more households. **The benchmark represents 50% of planned households served. | | | | |

| 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
- Waiver of the Independent Entity requirement: Approved in FY 2020 and implemented in FY 2020

Description/Update

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

- **Percentage of Voucher Allocation:** HABC reserves the right to allocate up to 30% of its Tenant Based HCV funding for PB vouchers.
- **Project Cap:** HABC may enter into PB Voucher HAP contracts for greater than 25% of the units in a project/development regardless of the family or household type that will occupy the units provided that the household is eligible. Units subsidized with PB vouchers under this MTW initiative are placed under a HAP contract upon turnover.
- **Floating Units:** HABC will allow for floating units instead of identifying specific units in the HAP contract in the PB program.
- **Amendments to PB HAP Contracts:** Using its MTW authority, HABC has waived the three-year restriction on amending HAP contracts. HABC may amend the HAP contract at any time during the initial term of the HAP contract and during any renewal term of the HAP contract. HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PB units and the non-Bailey LTA PB units.

- **Independent Entity Requirement:** HABC has waived the requirement for Independent Entities to approve AHAP/HAP Contracts, renewal terms, rent determinations and inspections of HABC owned properties.

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

1. Subject to funding availability, owners may obtain applicants directly from the Mayor’s Office of Homeless Services (MOHS) or other designated service providers for the chronically homeless and veterans or other such targeted population and refer such applicants to HABC to determine eligibility for receiving a voucher subsidy. All referrals will be placed on a waiting list maintained by HABC. HABC has awarded 171 (reserves the right to award up to 192) PBVs for the chronically homeless and 19 (reserves the right to award up to 182) PBVs for veterans.
2. Owners are required to maintain the designated unit for the term of the PBV HAP contract. In the event the owner fails to lease a designated unit to an approved applicant, such failure will be considered a default under the PBV HAP Contract. If the default is not cured within 60 calendar days, HABC can remove the unit from the HAP contract, or recapture the amount of HAP paid for the period of time the tenant was occupying such unit in violation of the terms of the PBV HAP contract.

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

Planned Non-Significant Changes

No non-significant changes are planned for FY 2021.

Planned Changes to Metrics/Data Collection

| <i>HC #1: Additional Units of Housing Made Available</i> | | | | |
|--|------------------------|------------------|----------------|----------------------------|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase). | Implemented in FY 2019 | 464 units | | |
| <i>HC #4: Displacement Prevention</i> | | | | |

| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
|---|----------------|----------------|---------|---------------------|
| Number of households at or below 80% AMI that would lose assistance or need to move | 167 households | 464 units | | |
| <i>HC #5: Increase in Resident Mobility(Agency Specific Metric)*</i> | | | | |
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase). | 167 households | 541 households | | |

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

Planned Significant Changes

No significant changes are planned.

Activity #2006-03: Thompson Biennial Recertifications: BRHP

Plan Year Approved, Implemented, Amended

Approved FY 2006 and implemented FY 2007.

Description/Update

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

Planned Non-Significant Changes

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.

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

- Obtain an education or vocational certification: \$500 (max of \$1,000)

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

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

Planned Non-Significant Changes

There are no non-significant changes planned for FY 2021.

Planned Changes to Metrics/Data Collection

No changes.

Planned Significant Changes

No significant changes are planned.

Activity #2007-01: Mobility Program Enhancements/Thompson

(Formerly Exception Payment Standards and Security Deposit Assistance)

Plan Year Approved, Implemented, Amended

- Exception Payment Standards: Approved and implemented FY 2007
- Security Deposit Assistance: Approved and implemented FY 2017
- Incentive Payments to Landlords: Approved FY 2019

Description/Update

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

Additionally, as authorized in Section IV.B.5 of the Thompson Settlement Agreement, BRHP will use HAP funds for payment to landlords to cover a security deposit for Baltimore Housing

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

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

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2009-01: MTW Homeownership Program

Plan Year Approved, Implemented, Amended

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

Description/Update

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

In FY 2020, HABC worked with the City of Baltimore to develop a revitalization plan and identify scattered site units in areas selected for revitalization. Pending selection of the units, where applicable, demo/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.

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

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

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

Planned Non-Significant Changes

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

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

Property Feasibility – HABC will increase the limit on the scope of repairs and renovations from \$50,000 per unit to \$75,000 per unit, which may be increased by HABC to accommodate renovations related to disability accessibility or rehabilitation of properties within historic districts. Notwithstanding this limit, the rehabilitation costs cannot be more than 1/3 of the appraised value after rehab.

Soft Second Mortgages – HABC will modify the soft second mortgage provisions of the Plan to require that soft second mortgages be paid back in full during or after the first mortgage has been paid in full, if the property or any part of the land thereof is refinanced, or if ownership is transferred or sold.

Recapture Provisions and Deed Restrictions – HABC will modify the recapture formula provisions to remove soft second mortgages (see above) and to require recapture of portions of the appreciation during the first ten years after sale as follows: 1) First 5 years - -50% of appreciation; 2) Years 6-10 – 25% of appreciation; 3) Year 11 and beyond – no recapture of appreciation.

Pre-Sale Costs, Closing Costs and Downpayment Requirements – HABC will modify the Plan to indicate that HABC may match closing costs up to \$5,000 to be applied at closing. All closing costs will be based on need and only apply after required personal contribution, government and/or lender assistance have been applied.

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

Planned Changes to Metrics/Data Collection

No changes are proposed to the metrics.

Planned Significant Changes

No significant changes are planned.

Activity #2010-01: Unit Sizes

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

Under this initiative, HABC requires participating HCVP families to select a unit size consistent with and not greater than the unit size listed on their voucher. This policy applies to all new

admissions and moves. HABC does not require households who are in an existing unit and experience a decrease in family size to move. However, the payment standard will be adjusted to reflect (1) the lower of the actual unit size or (2) authorized voucher size for families who are over-housed at their next recertification.

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

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

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

LTA units are subsidized through Bailey LTA PBV contracts with minimum 40-year terms entered into between HABC and eligible property owners. LTA property owners are required to adopt the LTA Admissions & Continued Occupancy Criteria (LTA Criteria). Residents of Bailey LTA PBV Program units will have rights and protections as set forth in the LTA Criteria and will enter into

a lease with the project owner that is developed by HABC for the Bailey LTA PBV Program units, which incorporates the regulatory requirements for a public housing lease and grievance procedures. Bailey LTA PBV Program NED units are occupied by NEDs on HABC's public housing waiting list. The Bailey LTA PBV Program UFAS units are occupied by families on HABC's reasonable accommodation transfer waiting list and HABC's public housing waiting list who need the features of the UFAS units.

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2010-03: Thompson Risk Based Inspections

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

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

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2012-01: Rent Simplification – Thompson

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

Plan Year Approved, Implemented, Amended

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

Description/Update

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

- **Modified Deductions:** The gross annual income 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.
- **Asset Income Calculation:** 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. 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.
- BRHP's 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 HABC will apply its financial hardship policies to households who demonstrate hardship due to application of these policies.

Planned Non-Significant Changes

There are no non-significant changes planned for FY 2021.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

Description/Update

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

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

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

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2019-01: Rent Simplification

Plan Year Approved, Implemented, Amended

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

Description/Update

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

- *Exclusion of all FT Student Earned Income* – Under Rent Simplification, HABC excludes all full-time student earned income for adult full-time students, other than the head of household, co-head and spouse. HABC will continue to apply a dependent deduction to adult full-time students. Additionally, as HABC is excluding 100% of earned income for adult full-time students, HABC will only verify full-time student status; however, HABC will not conduct verification of full-time student earned income.
- *Self-Certification of Asset Value and Income and Exclusion of Asset Income* – HABC established \$50,000 as the threshold for self-certification of asset value and income. When the market/face value of assets is over \$50,000, HABC will apply regulatory verification requirements. Additionally, HABC excludes income from assets where the market/face value of the asset is up to \$50,000. When the market/face value of a family's assets is in excess of \$50,000, HABC will calculate asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings rate.
- *Medical Expense Calculation Method* – HABC calculates medical expenses for eligible participants using past paid, unreimbursed expenses in addition to prospective medical insurance premiums. Over the counter medications will not qualify for a deduction unless accompanied by a prescription and paid receipts. This change will alleviate the need to try to determine anticipated medical procedures and expenses, which cannot be accurately forecasted; however, there is no change to the amount and type of medical expenses which can be deducted; and
- *Seasonal Income Calculation Method* – HABC will calculate seasonal income using the past four quarters of income as reported by the Enterprise Income Verification's (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment.

Planned Non-Significant Changes

HABC's payment standards policy allows HABC to apply payment standards outside of the regulatory range to support leasing in revitalized areas and opportunity neighborhoods. As such, HABC will apply the payment standard in effect on the effective date of the regular recertification regardless of fluctuations in payment standards from year to year. This change will greatly reduce the administrative burden and error rates in the application of payment standards when and if there is a decrease in payment standards. HABC will review hardships on a case-by-case basis when and if the application of the current payment standard results in a rent increase of more than 6%.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

Activity #2019-02: Local Fair Market Rent

Plan Year Approved, Implemented, Amended

Approved FY 2019; implemented January 1, 2019

Description/Update

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

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

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

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

HABC plans to implement this activity in FY 2020.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

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

Description of MTW Activity

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

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

HABC will utilize the rent ranges, by submarket and by bedroom size, to determine rent reasonableness. Additionally, depending on the applicable rent ranges in opportunity submarkets, HABC may increase the payment standards for opportunity submarkets to an amount no greater than 135% of FMR; however, this anticipated ceiling may be adjusted upon completion of the Rent Study once the market rents have been determined in the opportunity

areas. At that time, HABC will amend the activity for HUD approval prior to implementing a payment standard if higher than 135%.

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

Planned Non-Significant Changes

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

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

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

Planned Changes to Metrics/Data Collection

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

Planned Significant Changes

No significant changes are planned

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

Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2020.

Description/Update

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

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

HABC submitted its development proposal for the Bailey 10 to HUD by letter dated April 2, 2018. In the development proposal, HABC cited MLS listings for one-bedroom units “requiring minimal to moderate renovation listed for between \$100,000 and \$150,000”. The development budget submitted to HUD included an average acquisition and rehab cost estimate of \$157,000 per unit. Associated soft costs added another \$23,000 per unit resulting in a total per unit TDC of \$180,043. HUD approved HABC’s development proposal for the Bailey 10 in a letter dated April 23, 2018 (the “HUD Letter”).

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

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

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

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

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

B. Not Yet Implemented Activities

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

Plan Year Approved: FY 2020

Description of MTW Activity

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

1. An owner notifies HABC that a deficiency cited in previous re-inspection has been repaired or the allotted time for repairs has elapsed and under either circumstance the previously cited deficiency(ies) has/have not been corrected. Under this circumstance, HABC will require the owner to pay a reinspection fee prior to conducting a second reinspection. An example of this provisions is as follows:
 - A unit fails its regular inspection on March 5: No inspection fee.
 - A reinspection on April 4 reveals that the previously cited deficiencies have not been corrected: No inspection fee; however, HAP is abated.
 - On April 30, the owner notifies HABC that the previously cited deficiencies have been corrected. Prior to HABC conducting a second reinspection, HABC will charge, and the owner must pay, a reinspection fee.
 - Reinspection fees will be charged for each additional reinspection until the unit receives a pass rating.
2. For a unit not currently under HAP contract and where an HQS inspection has been scheduled, HABC will charge the owner for a reinspection if the unit is not ready for inspection, e.g. plumbing fixtures or appliances are not connected, the unit is under construction, disconnected or illegal utilities, excessive violations or the owner fails to provide access to the unit.
3. For a unit not currently under HAP contract, HABC will provide owners with a self-inspection checklist as part of the Request for Tenancy Approval (RFTA). The checklist will include guidance that upon inspection by HABC, if the unit fails inspection, HABC will schedule a reinspection. There will be no fee for the first reinspection. If the unit fails at the first reinspection, HABC will charge the owner a reinspection fee for the second reinspection if the family wishes to continue the process of leasing that unit. The reinspection fee must be paid in full prior to HABC conducting a second reinspection of the unit. An example of this provision is as follows:
 - Completed RFTA and inspection checklist are submitted by an owner on April 4.
 - HABC inspects the unit on April 10, and the unit fails inspection.
 - HABC will give the owner 15 days to correct the deficiency and conduct the first reinspection without charge to the owner.
 - If at that first reinspection, the unit fails for deficiencies found on the initial inspection that have not been corrected, HABC will issue the tenant a new RFTA.
 - On April 30, the owner notifies HABC that the family is still interested in the unit and requests a second reinspection, advising that the deficiency has been corrected. HABC will confirm with the family that they are still interested.

- HABC will not reschedule the reinspection until the owner pays the reinspection fee.
- Upon receipt of payment for the reinspection fee, HABC reschedules the second reinspection for May 3.

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

The reinspection fee will not apply to:

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

Reason for Delay

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

Statutory Objective

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

Implementation Schedule

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

Metrics

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

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

| 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 | | |

**HABC anticipates that implementation of a reinspection fee may result in a reduction in the number of re-*

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% | | |

**HABC does not anticipate that implementation of a reinspection fee will result in a reduced error rate related to compliance with HQS; however, this metric is required by HUD for HQS related activities.*

Cost Implications

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

Need/Justification for MTW Flexibility

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

Rent Reform/Term Limit Information

Not applicable.

Activity #2020-02: The Healthy Opportunities Program

Plan Year Approved: FY 2020

Description of MTW Activity

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

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

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

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

Reason for Delay

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

Statutory Objective

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

Planned Non-Significant Changes:

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

Implementation Schedule

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

Metrics

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

| <i>HC #1: Additional Units of Housing Made Available*</i> | | | | |
|---|-----------------|------------------|----------------|----------------------------|
| Unit of Measurement | Baseline | Benchmark | Outcome | Benchmark Achieved? |
| Number of new housing units made available for households at or below 80% of AMI as a result of the activity (increase) | 0 | 0 | | |

**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.*

| HC #5: Increase in Resident Mobility | | | | |
|---|-----------------|------------------|----------------|----------------------------|
| 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

Plan Year Approved: FY 2020

Description of MTW Activity

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

Reason for Delay

Planned implementation delayed due to COVID-19.

Statutory Objective

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

Implementation Schedule

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

Metrics

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

| <i>CE #1: Agency Cost Savings</i> | | | | |
|-----------------------------------|----------|-----------|---------|---------------------|
| 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.

C. MTW Activities on Hold

Activity #2009-02: Section 811 Supportive Housing

Description

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

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

Plan for Reactivating the Activity

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

Explanation of Non-Significant Changes Since Approval

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

Activity #2012-02: Direct Homeownership Program

Description

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

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

Plan for Reactivating the Activity

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

Explanation of Non-Significant Changes Since Approval

No changes have been made since approval.

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

Description

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

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

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

Plan for Reactivating the Activity

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

Explanation of Non-Significant Changes Since Approval

No changes have been made since approval.

D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that HABC has completed, discontinued, or determined do not require MTW authority to implement. HABC will report on any additional activities, which have been closed out in the FY 2020 MTW Report.

Table 10: Closed-Out MTW Activities

| Activity | Plan Year Approved and Implemented | Close Out Year | Reason for Close Out |
|--|---|----------------|--|
| Risk-Based Inspections (Activity #2006-05) | Approved: FY 2006 Implemented: FY 2014 | FY 2019 | HABC implemented a Risk-Based inspection process in order to ensure that the highest housing quality standards are maintained and that HABC resources are utilized in an efficient and effective manner. Units that have consistently met annual inspection standards, will be inspected every two years. Units which do not have such a track record are inspected annually. HABC closed out this activity due to the 2014 Appropriations Act that allows HABC to transition to a biennial inspection schedule without MTW authority. |
| Project-Based for Transitional Housing (Activity #2007-02) | FY 2007/2008 | FY 2014 | HABC provided PB vouchers to the Collington House facility that is a transitional housing program. In 2014, the Collington House facility lost its eligibility to retain project-based vouchers and this program was closed out. |
| Payment Standards at the 50 th Percentile (Activity #2009-03) | FY 2009 | FY 2011 | HUD had adjusted the area Fair Market Rent (FMR) to the 50 th percentile for HABC; therefore, MTW authority was no longer required and this activity was closed out in FY 2011. Please note that this activity was re-proposed in the FY 2019 Plan as the 50 th percentile FMR was being phased out. At the time the activity was closed, use of the 50 th percentile FMR was provided by HUD, and MTW authority was not needed. |
| HAP Contract Modifications (Activity #2009-05) | Approved: FY 2009 Implemented: FY 2010 | FY 2019 | Using MTW authority, HABC will allow for floating units instead of identifying specific units in the HAP contract in the Project-Based Voucher program. This previously HUD approved activity was closed out and combined with other previously HUD approved Project- Based Program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02). |

| Activity | Plan Year Approved and Implemented | Close Out Year | Reason for Close Out |
|---|---|----------------|--|
| Utility Allowance for Families Living in Larger Units than Voucher Size (Activity #2010-04) | Approved: FY 2010 Implemented: FY 2012 | FY 2014 | Under the 2014 Appropriations Act, the rule on utility allowances changed to require that PHAs match the utility allowance payment to the actual unit size and not the voucher size. This MTW activity, approved in FY 2010, was incorporated into the Unit Size activity and implemented in FY 2012. Based upon the 2014 Appropriations Act language, HABC no longer needs to designate this activity as MTW. |
| Gilmor Self Sufficiency Initiative (Activity #2010-05) | FY 2010 | FY 2017 | This activity simplified the rent policy for staff and residents, and encouraged employment, job retention and wage progression. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015, and the activity was closed out in FY 2017 when HABC became the recipient of a \$2.5 million Jobs Plus grant that provides employment counseling to public housing residents that otherwise could not be provided under MTW. |
| Rent Increase Determinations (Activity #2011-01) | FY 2011 | FY 2016 | This activity increased cost effectiveness in Federal expenditures by keeping program spending within budgetary limits. Suspending rent increase adjustments helped keep HCV Program spending within budgetary limits. Exceeding available funding had the potential to force HABC to withdraw assistance from a number of families causing a hardship for those families and property owners. This MTW activity was intended to keep spending within budgetary limits. It was closed out in FY 2016 since HABC was able to maintain budgetary limits without imposing suspension of rent increases to owners. |
| Asset Self-Certification (Activity #2011-02) | FY 2011 | FY 2019 | To streamline operations, HABC allowed residents to self-certify income from assets with total asset values per household of less than \$5,000. The Asset Self-Certification activity was approved by HUD in FY 2011. HABC closed out this activity and re-proposed it in FY 2019 as part of the Rent Simplification activity. This action allows HABC to report on all Rent Simplification activity features under one activity. |
| Rent Policy (Activity #2012-03) | FY 2012 | FY 2015 | HABC received HUD approval in FY 2012 to implement an Agency-wide rent policy adopted for Gilmor Homes; however, due to lack of funding and the on-going revisions of the Gilmor Homes rent policies, this activity was placed on hold in FY 2014. This activity was identical to the Gilmor Homes Demonstration Program and was implemented at |

| Activity | Plan Year Approved and Implemented | Close Out Year | Reason for Close Out |
|--|---|----------------|---|
| | | | the remaining HABC sites. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015. |
| Adjusted Income for Thompson Participants (Activity #2012-04) | FY 2012 | FY 2019 | <p>Pursuant to HABC's MTW authority, for participants in the Baltimore Housing Mobility Program, gross annual income was reduced using standard deductions. This activity was approved and implemented in FY 2012.</p> <p>There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions replace all other regulatory deductions. The deductions are:</p> <ul style="list-style-type: none"> • \$3,200 for households with wages • \$1,200 for households without wages • \$400 for any elderly or disabled family (to be combined with either of the above deductions) <p>This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now call Rent Simplification – Thompson (Activity #2012-01).</p> |
| Adoption of New Investment Policies for HABC (Activity #2013-01) | Approved: FY 2013 Not Implemented | FY 2015 | In FY 2013, HABC proposed adopting new investment policies, thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General Depository Agreement with the State. This activity was never implemented. |
| Journey Home (Activity #2013-02) | FY 2013 | FY 2017 | Under this activity, HABC exercised its MTW fund flexibility in order to use MTW Block Grant Funds as housing subsidy for participants in the Journey Home Program. The Journey Home Program was closed in FY 2016 and the activity was closed out in FY 2017. |
| Exclude Income from Full-Time Students and Adopted Household Members | FY 2014 | FY 2019 | Using MTW authority, HABC modified the definition of annual income by excluding FT student earned income and adoption assistance income for families living in Thompson units. These exclusions were part of an effort to support |

| Activity | Plan Year Approved and Implemented | Close Out Year | Reason for Close Out |
|---|---|----------------|--|
| (Activity #2014-02) | | | economic self-sufficiency as well as to streamline program administration. As 100% of the income from these two sources is excluded, third party verification of income is not required. This activity was approved and implemented in FY 2014. This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now called Rent Simplification – Thompson (Activity #2012- 01). |
| Encouraging Leasing in Higher Opportunity Neighborhoods (Activity #2015-01) | Approved: FY 2015 Not Implemented | FY 2016 | Using its MTW authority, the Baltimore Regional Mobility Program required families to select units that are consistent with and not larger than the dwelling unit size listed on their voucher. This policy applied to new admissions as well as to participating households who requested program moves. HABC, on a case-by-case basis, made exceptions to this policy as a reasonable accommodation. This MTW activity was planned for implementation in FY 2015. However, upon further consideration, BRHP decided not to implement this activity and it was closed out in FY 2016. |
| Energy Conservation Utility Allowance (Activity #2015-02) | FY 2015 | FY 2016 | HABC provides a Utility Allowance to households responsible for payment of utilities for water, electricity, gas, other heating, cooking fuels and sewage services. In an effort to reinforce energy conservation activities and reduce the cost of water/sewage utility allowances, HABC will encourage the completion of a water audit and use of low-flow toilets by HCV tenants and landlords/owners. This MTW activity was placed on hold due to comments from the public and closed out in FY 2016. |
| The Front Door Program (Activity #2015-03) | FY 2015 | FY 2017 | HABC partnered with the The Mayor’s Office of Human Services/Homeless Services Program, Sarah’s Hope (a shelter for the homeless) and St. Vincent De Paul to provide MTW Block Grant funds to the Front Door Program to rapidly house 36 homeless families for up to one year using two distinct strategies. The contract ended December 31, 2014, six months into HABC’s FY 2015, and was not renewed, which resulted in closure of the activity. |
| Project Based Voucher Amendments to the HAP Contract | 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 |

| Activity | Plan Year Approved and Implemented | Close Out Year | Reason for Close Out |
|---|------------------------------------|----------------|---|
| (Leased Housing) (Activity #2015-04) | | | of the HAP contract and during any renewal term of the HAP contract. Under this activity, HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PBV units and the non- Bailey LTA PB units. This activity was previously on hold and was approved in FY 2015. HABC closed out this activity and combined it with other previously HUD approved Project Based program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02). |
| Security Deposit Assistance (Activity #2017-02) | FY 2017 | FY 2019 | Under this activity, BRHP will use HAP funds for payment to landlords to cover a security deposit for Baltimore Housing Mobility Program participants leasing in a census tract designated “opportunity” by BRHP. Subject to funding availability, BRHP will offer each participant this Security Deposit Assistance on a one-time basis, and only if that participant has repaid the entire balance of any previously grant-funded Security Deposit Assistance Loan and is otherwise in good standing with BRHP. The Security Deposit Assistance will not exceed the equivalent of one-month’s rent and BRHP will require a participant contribution towards the security deposit of between \$200 and \$500 dollars, which will be adjusted seasonally to encourage leasing in summer months. This activity was approved and implemented in FY 2017. HABC closed out this activity and combined it with other previously HUD approved Mobility Program Enhancement activities. HABC also modified this activity in FY 2019 under the previously approved Mobility Enhancement activity. |
| Sponsor-Based Project-Based Transitional Housing | FY 2017 | FY 2021 | HABC partnered with the Women’s Housing Coalition to provide permanent housing for up to 25 homeless, hard-to-house families. A HAP Contract has been signed for up to 15 years with the option to renew; all families are housed and receiving supportive services allowing this activity to be closed out. |
| Landlord Payment Methods and Electronic Communication | FY 2018 | FY 2021 | HABC has moved to 100% online communication; this activity was originally developed to encourage enrollment in online communications or be charged a fee for paper communications. Almost 100% of owners are enrolled in direct deposit and receiving electronic communications; therefore, this activity is not cost effective and can be |

| Activity | Plan Year Approved and Implemented | Close Out Year | Reason for Close Out |
|----------|------------------------------------|----------------|----------------------|
| | | | closed out. |

V. Sources and Uses of MTW Funds

This section of the Annual Plan describes HABC’s planned sources and uses of MTW Block Grant 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 2021

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 | \$ 18,965,187 |
| 70600 | HUD PHA Operating Grants | \$ 307,026,362 |
| 70610 | Capital Grants | \$ 22,021,969 |
| 70700 (70710+70720+70730+70740+70750) | Total Fee Revenue | \$ 0 |
| 71100+72000 | Interest Income | \$ 716,273 |
| 71600 | Gain or Loss on Sale of Capital Assets | \$ 0 |
| 71200+71300+71310+71400+71500 | Other Income | \$ 2,512,002 |
| 70000 | Total Revenue | \$ 351,241,793 |

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 2021.
- HABC’s Total Operating Grants of \$307,026,362 from HUD include the following funding estimates:

- Section 8 HCV Housing Assistance Payments (HAP) subsidies in the amount of \$145,980,828 for Regular HABC Vouchers, including Port ins and \$76,204,283 for Thompson Partial Consent Decree and Remedial Vouchers and \$5 million in MTW/HAP funds;
- Ongoing Administrative Fee Earned in the amount of \$15,038,682 (\$11,714,983 for Regular HABC Vouchers, \$3,323,699 for Partial Consent Decree and Remedial Vouchers); and
- Public Housing Subsidies of \$64,802,569 is budgeted based on an estimated 90% funding proration for the calendar year ending December 31, 2021.
- Capital Grants funding of \$22,021,969 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 | \$ 39,819,147 |
| 91300+91310+92000 | Management Fee Expense | \$ 82,248 |
| 91810 | Allocated Overhead | \$ (264,883) |
| 92500 (92100+92200+92300+92400) | Total Tenant Services | \$ 2,001,462 |
| 93000 (93100+93600+93200+93300+93400+93800) | Total Utilities | \$ 16,019,942 |
| 93500+93700 | Labor | \$ 0 |
| 94000 (94100+94200+94300+94500) | Total Ordinary Maintenance | \$ 32,645,440 |
| 95000 (95100+95200+95300+95500) | Total Protective Services | \$ 513,361 |
| 96100 (96110+96120+96130+96140) | Total Insurance Premiums | \$ 3,117,227 |
| 96000 (96200+96210+96300+96400+96500+96600+96800) | Total Other General Expenses | \$ 12,061,523 |
| 96700 (96710+96720+96730) | Total Interest Expense and Amortization Cost | \$ 2,013,970 |

| FDS Line Item Number | FDS Line Item Name | Dollar Amount |
|-------------------------|--|-----------------------|
| 97100+97200 | Total Extraordinary Maintenance | \$ 800,000 |
| 97300+97350 | Housing Assistance Payments + HAP Portability-In | \$ 222,642,689 |
| 97400 | Depreciation Expense | \$ 19,998,092 |
| 97500+97600+97700+97800 | All Other Expenses | \$ 400,000 |
| 90000 | Total Expenses | \$ 351,850,218 |

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

| | |
|----------------------------|----------------|
| Total Expenses | \$ 351,850,218 |
| Less: Depreciation Expense | \$(19,998,092) |
| Capital Hard Cost | \$ 19,464,019 |
| MTW Uses of Funds | \$ 351,316,145 |

Uses of Funds exceed Sources of Funds by \$74,352, 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 CY 2021 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 and use of MTW/HAP funds for vacancy renovations.
- Protective Services includes outside security contracts for the developments.
- Insurance Premiums are budgeted for properties, general liability, worker's compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
- Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT).
- 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 \$222,642,689 (\$148,838,406 for Regular HABC Vouchers-including Port-ins, and \$73,804,283 for BRHP.) 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 2021 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 2021 using the single fund flexibility concept:

- Due to inadequate funding for capital activities, HABC plans to use the unutilized prior year’s HCV HAP Fund to supplement various capital improvements as detailed in the FY2021 Capital Spending Plan and development activities using the single fund flexibility provisions.
- HABC will use these same MTW Fund for renovation and rehabilitation of vacant units using the single fund flexibility provisions.

B. Local Asset Management Plan (LAMP)

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

HUD has approved HABC’s Local Asset Management Program as part of the Annual Plan submission since FY 2010. The proposed updated cost allocation calculations for CY 2021 are included in Appendix C. The indirect cost rate for 2021 will be 14.52% for MTW and 7.81% for non-MTW.

C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

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

the future and are subject to approval by HUD and the HABC Board of Commissioners. HABC may apply for additional RAD conversions beyond those shown in Tables 13 and 14.

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

| Property Name | No. of Units Converted to PBRA | RAD Conversion Type | Dated Closed or Projected to Close | Major Milestone/Status | RAD Significant Amendment Submission Date* | RAD Significant Amendment Approval Date |
|--------------------|--------------------------------|---------------------|------------------------------------|--|--|---|
| Allendale | 164 | PBRA | 11/15 | HUD approved the RAD Completion Certification. | 5/12/15 | 10/27/15 |
| BE Mason | 223 | PBRA | 11/15 | Under review for HUD certification of completion | 5/12/15 | 10/27/15 |
| Bel Park Tower | 253 | PBRA | 11/15 | HUD approved the RAD Completion Certification. | 5/12/15 | 10/27/15 |
| Brentwood | 150 | PBRA | 12/15 | Under review for HUD certification of completion | 5/12/15 | 10/27/15 |
| Broadway Overlook | 84 | PBRA | 8/17 | HUD approved the RAD Completion Certification. | 10/26/16 | 01/26/17 |
| Chase House | 189 | PBRA | 12/16 | Submitted to HUD for certification of Completion | 5/12/15 | 10/27/15 |
| Ellerslie | 117 | PBRA | 2/17 | Under review for HUD certification of completion | 10/26/16 | 01/26/17 |
| Govans Manor | 191 | PBRA | 11/16 | Under review for HUD certification of completion | 10/26/16 | 01/26/17 |
| Hillside Park | 30 | PBRA | 12/17 | HUD approved the RAD Completion Certification. | 12/1/17 | 6/29/18 |
| Hollins House | 130 | PBRA | 11/15 | Under review for HUD certification of completion | 5/12/15 | 10/27/15 |
| Lakeview Tower | 302 | PBRA | 11/15 | HUD approved the RAD Completion Certification. | 5/12/15 | 10/27/15 |
| McCulloh Extension | 347** | PBRA | 11/16 | Under review for HUD certification of completion | 5/12/15 | 10/27/15 |

| 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 |
|--|--------------------------------|---------------------|------------------------------------|--|--|---|
| Primrose Place | 125 | PBRA | 2/16 | Under review for HUD certification of completion | 5/12/15 | 10/27/15 |
| Pleasant View Gardens Senior | 110 | PBRA | 7/16 | Submitted to HUD for certification of Completion | 5/12/15 | 10/27/15 |
| Pleasant View Gardens Townhomes | 201 | PBRA | 9/16 | HUD approved the RAD Completion Certification. | 5/12/15 | 10/27/15 |
| Senior Townes at the Terraces | 47 | PBRA | 11/17 | HUD approved the RAD Completion Certification. | 10/26/16 | 01/26/17 |
| Wyman House | 168 | PBRA | 12/15 | HUD approved the RAD Completion Certification. | 5/12/15 | 10/27/15 |
| Heritage Crossing | 75 | PBRA | 11/18 | HUD approved the RAD Completion Certification. | 12/1/17 | 6/29/18 |
| J. Van Story Branch Apts | 350*** | PBRA | 11/18 | Projected completion of construction November 2020 | 12/1/17 | 6/29/18 |
| Monument East | 170 | PBRA | 10/18 | Completed February 2020. | 12/1/17 | 6/29/18 |
| Rosemont Tower | 203 | PBRA | 9/19 | Projected completion of rehab: February 2021. | 12/1/17 | 6/29/18 |
| Scattered Sites (Thompson 58/Broadway Homes) | 58 | PBRA | 5/19 | Projected completion of rehab: November 2020 | 04/12/17 | 12/27/17 |
| Somerset Court Extension | 58 | PBRA | 9/19 | Projected completion of rehab: February 2021 | 12/1/17 | 6/29/18 |
| 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 anticipates closing on Somerset Homes Phase 2 RAD conversions in FY 2020. The table below identifies projects that are anticipated to be converted under RAD in FY 2021. Future RAD Significant Amendments will be prepared and submitted per HUD required timelines.

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

| Property Name | RAD Units | RAD Conversion Type | CHAP Received (Yes/No) | Major Milestones |
|-----------------------|-----------|----------------------|------------------------|--|
| Carey House | 23 | PBRA | Yes | Developer selected. RAD conversion will not take place in 2021. |
| Laurens House | 36 | PBRA | Yes | Developer selected. RAD conversion will not take place in 2021. |
| Dukeland | 27 | PBRA | Yes | Developer selected. RAD conversion will not take place in 2021. |
| The Rosemont Low Rise | 106 | PBV | Yes | Developer selected. RAD conversion may take place in 2021. |
| Oswego Mall | 35 | PBRA | Yes | Developer selected. RAD conversion may take place in 2021. |
| Shipley Hills | 21 | PBRA | Yes | Developer selected. RAD conversion will not take place in 2021. |
| Hollander Ridge | 94 | PBRA | Yes | The acquisition of 94 units was completed in June 2019; Closed on project financing April 2020. Full conversion RAD will not take place until the end of 2021. |
| Perkins RAD/CNI | 629 | 75% RAD PBV; 25% PBV | Yes | CHAP awards received for all of Perkins and Somerset. The following phases: Perkins Phase I is 48 units; Perkins Phase 2 for 76 units; Phase 3 for 71 units; Phase 4 – 70 units; Phase 5 is 112 units.); Somerset |

| Property Name | RAD Units | RAD Conversion Type | CHAP Received (Yes/No) | Major Milestones |
|--------------------|-----------|----------------------|------------------------|---|
| | | | | Phase 4 is 89 units. Perkins Phase I RAD conversion planned to close in 2021. Perkins first phased demo to begin January 2020 with projected financial closing in March 2021; Perkins Phase 2 submitted 9%/4% Twinning Application on 9/9/20. |
| Somerset Homes/CNI | 100 | 40% RAD PBV; 60% PBV | | Somerset Phase 2 CHAP award received for 520 Somerset (9%) – 44 units; 525 Aisquith (4%) for 56 units. |
| Somerset Homes/CNI | 36 | 40% RAD PBV; 60% PBV | | Somerset Phase 3 CHAP award received for 420 Aisquith Street – 36 units. |
| Poe Homes | 288 | 75% RAD PBV; 25% PBV | Yes | Developer selected & MDA under negotiation; Choice Neighborhood Transformation Plan submitted to HUD on 9/3/20; HABC awaiting HUD acceptance of housing plan. HABC may submit a dispo application and a Choice Neighborhood Implementation Grant application in 2021 and/or subsequent years. |
| McCulloh Homes | 556 | PBV | Yes | The overall concept plan for the site has been developed. RAD conversions will not take place in 2020 and will not occur until after the State Center plan is approved. |
| Arbor Oaks | 62 | PBV | Yes | HABC acquired limited partnership & managing general partnership interests in July 2020 & projects RAD Financing Plan will be submitted by 3/31/2021. RAD conversion may take place in late 2021. RAD Significant amendment submitted on 12/1/17 and approved on 6/29/18 |

| Property Name | RAD Units | RAD Conversion Type | CHAP Received (Yes/No) | Major Milestones |
|------------------------|--------------|---------------------|------------------------|--|
| Townes at the Terraces | 203 | PBRA | Yes | HABC acquired limited partnership & managing general partnership interests in July 2020 & projects RAD Financing Plan will be submitted by 3/31/21. RAD conversion may take place in 2021. RAD Significant Amendment submitted on 12/1/17 and approved on 6/29/18. |
| TOTAL | 2,180 | | | |

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

Yes

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

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

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

VI. Administrative

A. Board Resolution and Certification of Compliance

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

B. Documentation of Public Process

HABC provided public notice of the FY 2021 MTW Annual Plan and posted the Plan on its website. HABC also made copies of the FY 2021 Amended Annual Plan available at HABC's main offices. A 30-day public comment period to allow for resident and general public review was provided from October 30, 2020 through November 30, 2020. A public hearing was held and recorded via WebEx video conference on November 24, 2020. Twenty-six (26) people attended the public meeting. Prior to finalizing the Plan, HABC considered all comments received during the public review process. Documentation of the public process and comments received are included as Appendix F.

C. Indirect Cost Rate and Local Asset Management Plan

HABC will continue to monitor and evaluate MTW activities during FY 2021. At this point, HABC does not intend to use external evaluators for new or ongoing MTW initiatives. Internal reports will be generated on a periodic basis to assess performance against proposed targets. Quarterly internal reviews are conducted with program staff and management to review and evaluate results and, if necessary, to modify proposed strategies to improve results. Annual evaluation results will be reported as appropriate by HABC in the MTW Annual Report.

D. Lobbying Disclosures

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

E. Certification of Payments

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

F. Planned and Ongoing Evaluations

HABC will continue to monitor and evaluate MTW activities during FY 2021. At this point, HABC does not intend to use external evaluators for new or ongoing MTW initiatives. Internal reports will be generated on a periodic basis to assess performance against proposed targets. Quarterly internal reviews are conducted with program staff and management to review and evaluate results and, if necessary, to modify proposed strategies to improve results. Annual evaluation results will be reported as appropriate by HABC in the MTW Annual Report.

Appendix A: Board Resolution

A Resolution of the Board of Commissioners Approving

1. The Moving to Work Annual Plan;
2. Housing Choice Voucher Revisions to the Administrative Plan; and
3. Revisions to the Public Housing Admissions and Continued Occupancy Policy for Fiscal Year 2021 BOC-12-2020-39

HOUSING AUTHORITY OF BALTIMORE CITY

**A Resolution of the Board of Commissioners Approving
(a) the Moving to Work Annual Plan; (b) Revisions to the Housing Choice Voucher
Administrative Plan; and (c) Revisions to the Public Housing Admissions and Continued
Occupancy Policy for Fiscal Year 2021**

WHEREAS, Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Pub. L. 104-134) established statutory framework known as the Public Housing/Section 8 Moving to Work Demonstration (“**MTW**”) Program; and

WHEREAS, the U.S. Department of Housing and Urban Development (“**HUD**”) determined that HABC was eligible to participate in the MTW Program; and

WHEREAS, on December 24, 2008, HABC and HUD entered into an Amended and Restated MTW Agreement (the “**MTW Restated Agreement**”), setting forth the terms and conditions for HABC’s continued participation in the MTW Program; and

WHEREAS, in accordance with Section VII. A.1.f. of the MTW Restated Agreement and Attachment B thereto, HABC has prepared its Annual MTW Plan for Fiscal Year 2021 (the “**FY 2021 Annual Plan**”) consistent with the terms and objectives of the MTW Restated Agreement; and

WHEREAS, HABC has made the FY 2021 Annual Plan, revisions to the FY 2021 Housing Choice Voucher Program (“**HCVP**”) Administrative Plan, and revisions to the FY 2021 Public Housing Admissions and Continued Occupancy Policy (“**ACOP**”) available for review and comment by HABC residents, the HABC Resident Advisory Board, other resident organizations, advocacy groups, and the general public (collectively, the “**Community**”) for a period of thirty (30) days; and

WHEREAS, HABC met with the Resident Advisory Board to discuss the FY 2021 Annual Plan, including revisions to the FY 2021 HCVP Administrative Plan and the FY 2021 ACOP, and to gather input; and

WHEREAS, on November 24, 2020, HABC held a public hearing and received public comments on the FY 2021 Annual Plan, and in accordance with the MTW Restated Agreement HABC has considered all comments received on the FY 2021 Annual Plan, including revisions to the FY 2021 HCVP Administrative Plan and the FY 2021 ACOP.

NOW THEREFORE, BE IT RESOLVED BY the HABC Board of Commissioners (the

“Board”), as follows:

1. The FY 2021 Annual Plan is hereby approved and HABC is authorized to submit the FY 2021 Annual Plan to HUD.
2. The revisions to the FY 2021 HCVP Administrative Plan is hereby approved.
3. The revisions to the FY 2021 ACOP is hereby approved.
4. The FY 2021 Annual Plan Certifications of Compliance with Regulations (the “**Certifications**”), attached hereto as **Exhibit A**, are hereby adopted, and the Chair of the Board is hereby authorized to execute such Certifications on behalf of the Board.
5. Upon approval by HUD, the Chief Executive Officer shall be authorized to cause the implementation of the FY 2021 Annual Plan.
6. The Chief Executive Officer, or her designee, is hereby authorized to take any and all appropriate actions, and execute all appropriate documents necessary to carry out this Resolution consistent with its terms.

PASSED, ADOPTED AND APPROVED this 15th day of December 2020. **ATTEST:**

Approved as to form and legal sufficiency this
8th day of December 2020 by:



Janet Abrahams
Secretary/Chief Executive Officer



Robin Carter Chairperson

Jan Goslee, EVP and General Counsel
HABC Office of Legal Affairs

EXHIBIT A

CERTIFICATIONS OF COMPLIANCE



Certification of Consistency with the Baltimore City Consolidated Plan

To whom it may concern:

The Housing Authority of Baltimore City's *Moving to Work Annual Plan Fiscal Year 2021* is consistent with Baltimore City's draft *Consolidated Plan July 1, 2020 – June 30, 2025*. Several sections of the City's *Consolidated Plan* were developed in concert with the Housing Authority of Baltimore City including: Needs Assessment Section NA-35 Public Housing, pages 44 - 47; Market Analysis Section MA-25 Public and Assisted Housing, page 59; Strategic Plan Sections, pages 129 – 131; SP-45 Goals Summary and Goal Descriptions, pages 136 – 145, and SP-50 Public Housing Accessibility and Involvement, pages 146 - 147.

Specific goals in the Baltimore City *Consolidated Plan* consistent with goals in the Housing Authority of Baltimore City's *Moving to Work Annual Plan Fiscal Year 2020* include:

SP-45 Goal 2: Provide Affordable Rental Housing, page 141; SP-45 Goal 6: Provide Housing for Non-Homeless Special Needs Populations, page 142; SP-45 Goal 12: Provide Housing for Homeless and At-Risk of Homelessness, page 143; SP-45 Goal 14: Rehab of Existing Affordable Rental Housing; pages 142; SP-45 Goal 16: Implement Fair Housing Practices; pages 144.

The Annual Action Plan portion of the Baltimore City Consolidated Plan requires an annual certification, signed by the Commissioner of the Baltimore City Department of Housing and Community (DHCD), that it will affirmatively further fair housing including the undertaking of an Analysis of Impediments to Fair Housing Choice (AI). Staff from the Housing Authority of Baltimore City and DHCD work together as members of the Regional Fair Housing Group and helped prepare a new regional AI that went into effect in April of 2020. If there are any questions concerning this certification, please contact me at steve.janes@baltimorecity.gov.

Name of Certifying Jurisdiction: Baltimore City

Certifying Official of the Jurisdiction: Stephen Janes

Title: Deputy Commissioner for Research and Consolidated Planning,
Baltimore City Department of Housing and Community Development

Signature: *Stephen Janes*

Date: December 15, 2020

Brandon M. Scott, Mayor Alice Kennedy, Acting Housing Commissioner

Joseph L. Smith
Chairman, Board of Commissioners

Janet Abrahams
President / Chief Executive Officer



417 East Fayette Street Baltimore, MD 21202 443-984-5757 dhcd.baltimorecity.gov

HOUSING AUTHORITY OF BALTIMORE CITY FY 2021 Annual Plan

Certification of Compliance

I, Janet Abrahams, President and Chief Executive Officer, hereby provide this certification on behalf of the Housing Authority of Baltimore City (HABC) in submitting the FY 2021 MTW Annual Plan. I hereby certify that HABC has met the following three statutory requirements as set forth under its Moving to Work Agreement: 1) assuring that at least 75 percent of the families assisted by HABC are very low-income families; 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the public housing and Section 8 funds not been combined; and 3) maintaining a comparable mix of families (by family size) served, as would have been provided had the MTW funds not been used under the demonstration.

A handwritten signature in black ink, appearing to read "J. Abrahams", is written over a horizontal line.

President/Chief Executive Officer

12/15/2020

Date

Housing Authority of Baltimore City | 417 East Fayette Street, Baltimore, MD 21202

410.396.3232 www.HABC.baltimorehousing.org [TWITTER](#) [Facebook](#) [@BmoreHabc](#)

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2021), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof.

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of Baltimore City (HABC)
MTW PHA NAME

MD002 / BOC-12-2020-39
MTW PHA NUMBER/HA CODE

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).

Robin Carter
**NAME OF AUTHORIZED
OFFICIAL**

, Chairperson, Board of Commissioners
TITLE


SIGNATURE

12-15-2020
DATE

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

Joseph L. Smith
Chairman, Board of Commissioners

Janet Abrahams
President / Chief Executive Officer



The following Housing Authority of Baltimore City (HABC) documents are now available to the public for review and comment:

- The FY 2021 MTW Annual Plan;
- The FY 2021 Housing Choice Voucher Administrative Plan (the HCVP Admin Plan);
- A Summary of Changes to the FY 2021 HCVP Admin Plan;
- The FY 2021 Baltimore Regional Housing Program Administrative Plan (the BRHP Admin Plan);
- A Summary of Changes to the FY 2021 BRHP Admin Plan;
- The FY 2021 Public Housing Admissions & Continued Occupancy Policies (ACOP); and
- A Summary of changes to the FY 2021 ACOP

The deadline to submit all comments is **November 30, 2020**.

HABC will hold a virtual public meeting at 4:00 pm on **Tuesday November 24, 2020** via video conference through Cisco WebEx. You will be required to register for the video conference if you wish to submit comments during the public meeting or otherwise listen to the proceedings. Please cut and paste the link below into your web browser in order to join the meeting.

In order to submit comments during the video conference, upon registering, please select the drop down response to indicate whether you want to make comments at the meeting. **You must register for the virtual meeting no later than November 23, 2020.**

In order to register for the meeting, please cut and paste the link below into your web browser:

<https://habc1.webex.com/habc1/onstage/g.php?MTID=ecc70665f0cab007fc8376870db998253>

Comments on the Amended Plan may be submitted to HABC by:

1. Email to Ms. Joyce Stewart at joyce.stewart@habc.org.
2. Registering to attend the public meeting by November 23, 2020 and answering “Yes” to the question; “Do you want to make a comment?”; and
3. First-class mail to Ms. Stewart at:

Housing Authority of Baltimore City
417 E. Fayette Street – Suite 1314
Baltimore, Maryland 21202
Attention: Joyce Stewart

Appendix C: Local Asset Management Plan

HABC CY21 Indirect Cost Rate Explanation,

A component of HABC's Local Asset management Plan

This cost allocation plan and process for Calendar Year 2021 represents year nine of HABC's local asset management plan allowed and approved as a component of its MTW participation.

Cost Allocation Approach

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

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

The above direct cost services have been carefully reviewed and found to support specific unique programs, whether it be public housing, Section 8, or direct City programs. Those costs that cannot be easily attributed to supporting one program are treated as indirect costs under the indirect cost pool. Indirect costs include:

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

The above indirect cost services have been carefully reviewed and found to support multiple programs, and as such must be treated as indirect, and allocated out in proportion to the direct services they support. The worksheet used to identify direct and indirect costs and to develop the anticipated indirect rate is attached to this narrative as **Attachment A**. The specific approach is as follows:

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

All costs used in this analysis are from the HABC Fiscal Year 2020 Approved Consolidated Budget. Based on this budget and the attached schedule, **the indirect cost rate for CY2021 will be 14.52% for MTW and 7.81% for non-MTW (see Attachment A for detail).**

Appendix D: Lobbying Activities (SF-LLL) Form


DISCLOSURE OF LOBBYING ACTIVITIES

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

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

| | | |
|--|--|---|
| 1. Type of Federal Action: <input checked="" 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 checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award | 3. Report Type: <input checked="" 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 checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Housing Authority of Baltimore City 417 E Fayette Street Baltimore, MD 21202 Congressional District, if known: ⁷ | 5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known: | |
| 6. Federal Department/Agency: HUD | 7. Federal Program Name/Description: Low Rent Public Housing 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: <u>Janet Abrahams</u> Title: <u>President and Chief Executive Officer</u> Telephone No.: <u>410-396-5504</u> Date: <u>11-2-20</u> | |
| Federal Use Only: | | Authorized for Local Reproduction Standard Form LLL (Rev. 7-97) |

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

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

Applicant Name
Housing Authority of Baltimore City

Program/Activity Receiving Federal Grant Funding
Low Rent Public Housing

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.

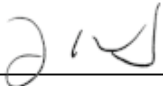
(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this 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 subrecipients 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 President and Chief Executive Officer |
| Signature  | Date (mm/dd/yyyy) 10/22/20 |

Previous edition is obsolete

form HUD 50071 (3/98)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

Appendix F: Comments Received on the FY 2021 Annual Plan

| COMMENT RECEIVED | HABC RESPONSE |
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| GENERAL COMMENTS | |
| <p>1. HABC’s ‘repositioning’ strategies set forth in the Annual Plan describe strategies that remove more of the affordable stock from HABC’s portfolio, either through RAD, or in the case of a significant number of scattered site units the sale of units to the City as ‘blight removal.’ Most troublesome is HABC’s proposal to forego the conversion of 25% of public housing units at Perkins, Somerset, and Poe, under RAD. It appears instead that HABC will simply demolish those units and replace them from vouchers in HABC’s existing inventory, causing a net decrease in available housing resources.</p> | <p>No change to the Annual Plan. The RAD/Section18 Blend, otherwise known as the 75%- 25% split is a method of financing under RAD. The RAD Implementation Notice H-2019-09 PIH-2019-23 (HA), issued: 09/05/2019 provides for this method under Section 1.5.B.2.a. In order to be approved for this method, the units that will be removed as public housing units must be replaced as new construction or substantial rehabilitation as project- based units. This method is also set forth in section 3.A.3.c in Notice PIH 2018-04. This method does not cause a reduction in housing resources. In fact, it allows the project to be more financially feasible since the contract rents will not be limited by the public housing subsidy that will be converted under RAD.</p> |
| <p>2. The existing rental-housing and eviction crisis in Baltimore City will be compounded by COVID-19. Unemployment, evictions, and homelessness, are on the horizon for many of Baltimore City’s low-income families. HABC’s Annual Plan should be a bold response. However, the further reduction in affordable housing stock, and ‘repositioning’ that predominant HABC’s activities will provide little relief to low-income renters on HABC’s waiting-list and the people who desperately need assistance.</p> | <p>No change to the Annual Plan. Because of the age and condition of much of HABC’s housing stock and the lack of resources to maintain and upgrade it, HABC has to make difficult decisions about which units are or can be made viable and which units it can longer keep. HABC is using the resources available to it to preserve existing affordable housing and to create new affordable housing as those resources allow.</p> |
| ANNUAL PLAN COMMENTS | |
| <p>3. We support the development of formal emergency preparedness plan. Emergency preparedness is a significant civil rights issue for persons with disabilities. Is HABC’s emergency preparedness plan available for review and public comment? How has HABC incorporated the civil rights of persons with disabilities into its emergency preparedness plan?</p> | <p>No change to the Annual Plan. HABC’s Emergency preparedness Plan is not available for review and comment.</p> |
| <p>4. Has HABC evaluated the implementation of resident rights protections at RAD or other properties? In January 2019, DRM submitted</p> | <p>No change to the Annual Plan. This subject is not included or discussed in the FY 2021 Annual Plan.</p> |

| COMMENT RECEIVED | HABC RESPONSE |
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| <p>an administrative complaint to HUD regarding the lack of proper notices to residents of RAD converted properties. It appeared that the Notice requirements of federal regulations and other legal requirements for Notice were not always adhered to by RAD Owner-Entities. These problems persist in RAD and other privately owned developments in HABC’s asset portfolio and HABC has not been able to effectively address these violations.</p> | <p>Further, the issues regarding proper notice to the residents have been addressed.</p> |
| <p>5. The Health Opportunities Program (HOP) sounds like a great program. How does HABC anticipate addressing the needs of residents in HABC public housing with medical conditions, such as asthma, that is exacerbated by environmental factors? HABC should consider expanding opportunities in HOP program to residents of public housing whose medical conditions are exacerbated by residing in public housing.</p> | <p>No change to the Annual Plan. HABC addresses the disabilities of public housing residents, such as asthma, through the reasonable accommodation policy and procedures.</p> |
| <p>6. PSO – HABC’s policy rational for only converting 75% of units under RAD at PSO is unclear. It would appear that all of the public housing units would be available for RAD conversion at PSO. However, HABC’s plan proposed only converting 75% of those units, and subsidizing the remaining 25% with PBV with its existing voucher inventory. This will result in a loss of housing in Baltimore City, and displacement of low-income families from the PSO site. Further, the subsidy associated with the remaining 25% PBVs does not have the funding security of RAD subsidies. The forty-year term associated with the remaining 25% is only for a period of 40 years. PBV subsidizes received under RAD must be offered and renewed at the conclusion of each contract period.</p> | <p>No change to the Annual Plan. See HABC’s response to #1 above.</p> |
| <p>7. Also, HABC recently entered into an extension agreement of the Bailey Consent Decree noting its intention to preserve UFAS units through RAD, as well as fulfill a commitment to develop additional RAD units. This agreement was predicated on HABC’s representation of conversion of those units under RAD.</p> | <p>No change to the Annual Plan. In the Notice of Plan to Continue Implementation of the Terms of the Bailey Consent Decree and Supplemental Consent Decree (the “Notice”), HABC did not note its intention to preserve UFAS units through RAD or to fulfill a commitment to develop additional RAD units. Rather the Notice identifies specific “steps that HABC is taking to fulfill its outstanding</p> |

| COMMENT RECEIVED | HABC RESPONSE |
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| | obligations under the Decrees.” The Notice does contain a section that addresses the preservation and development of UFAS units at the PSO site. HABC is preserving and creating UFAS units in the PSO as set forth in the Notice. |
| <p>8. Finally, HABC does not detail where RAD converted units will be in a disperse development footprint. It appears HABC had a choice to preserve affordable housing at PSO, but made a choice not to, instead opting for a decision where the benefits for residents are unclear and will fulfill the predictions that PSO will significantly displace low-income residents of color from the Perkins site. HABC should convert 100% of the replacement units to RAD to preserve the deep affordability of the units for long-term and expand affordable housing by not using its resources where other subsidy options exist.</p> | <p>No change to the Annual Plan. See HABC’s response to #1 above.</p> |
| <p>9. Poe Transformation – Will HABC be moving forward with some redevelopment or ‘repositioning’ of Poe even if HABC is not ultimately awarded a CNI Implementation Grant from HUD?</p> | <p>No change to the Annual Plan. HABC plans to look at all financial options to redevelop Poe Homes.</p> |
| <p>10. Scattered Site Units – HABC is selling 105 of scattered site units, the majority of which are being sold Baltimore City, but does not indicate if there are plans to preserve the affordability of these units. The plan indicates the choice to sell these scattered site units to the City is made when there is ‘on-going reinvestment or blight elimination.’ However, the Plan is not clear on a strategy for the loss of 105 units of affordable housing, and whether there is any replacement housing planned. HABC could ensure the long-term affordability of housing through this ‘repositioning’, but a more likely outcome is a loss of affordability of this housing. This loss of additional affordable housing comes when the need for affordability will be acutely felt in Baltimore City.</p> | <p>No change to the Annual Plan. Proceeds from the sale of Scattered Sites units will be used for affordable housing purposes as approved by HUD, which may include the development, redevelopment or preservation of affordable housing.</p> |
| <p>11. HABC does not state how many of the 758 UFAS units are actually available for leasing. Some of the UFAS units are no longer in HABC’s portfolio, including units at Gilmor and some scattered-site units HABC has</p> | <p>No change to the Annual Plan. HABC reports this information bi-annually to the U.S. Department of Justice and Disability Rights Maryland. (DRM).</p> |

| COMMENT RECEIVED | HABC RESPONSE |
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| <p>demolished. HABC should be transparent in the number of UFAS units that it actually has available to lease to residents. How many UFAS units are available for leasing?</p> | |
| <p>12. Since at least 2018, HABC has known that it plans to demolish 132 units at Gilmor and set aside 9.6 million for the project, only 4.4 million of which is for demolition. What is HABC’s plan to replace the units at Gilmor?</p> | <p>No change to the Annual Plan. There are no plans to replace the demolished units at Gilmor Homes.</p> |
| <p>13. Why has HABC consolidated vouchers set aside under <i>Bailey</i> with other ‘non-consent decree’ vouchers in the Chart? HABC should identify the set aside vouchers from <i>Bailey</i>.</p> | <p>No change to the Annual Plan. In September of 2018, HABC met its tenant-based voucher obligations under the Bailey Consent Decree. The vouchers mentioned by the Commenter are no longer considered “Bailey Vouchers” and have been absorbed into HABC’s non-consent decree inventory.</p> |
| <p>14. The Annual Plan is unclear whether HABC’s public housing waiting-list is open or closed. HABC has no clear plan to reopen the waiting-list and its proposed site-based waiting-list scheme is incomprehensible. HABC should open a community wide waiting-list and provide some options for the families that are going to need affordable housing in the upcoming rental crisis. It is more likely these revisions will remove more families from the waiting-list without HABC actually providing or offering housing. HABC’s proposed site based waiting-list attempts to shift the risk of delay and mismatching of units and individuals to applicant families. Additionally, Pursuant to 24 CFR § 903.7(b)(2)(iv), (v) HABC is required to take “reasonable measures to assure that adoption of site-based waiting lists is consistent with affirmatively furthering fair housing” and “review...its site-based waiting list policy to determine if the policy is consistent with civil rights laws and certifications.” In order for HABC to meet its obligations under these regulations, HABC must first have a baseline of information to properly monitor and review its waiting list policies. Without such a baseline, HABC cannot make the types of assurances required by the law that it has measures to affirmatively further fair housing. HABC has only provided a minimal amount of data that presents an</p> | <p>No change to the Annual Plan.</p> |

| COMMENT RECEIVED | HABC RESPONSE |
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| <p>incomplete picture of its present housing program. Without additional information, HABC will be unable to appropriately review its policies as required by 24 CFR § 903.7(b)(2). And will be unable to ensure that its policies, practices, and procedures affirmatively further fair housing and are consistent with its civil rights obligations.</p> | |
| <p>15. Choice Mobility under RAD should be tracked. The outcomes for families under the Choice-Mobility feature should be tracked and evaluated as to whether the Choice-Mobility feature advances housing choice for residents of RAD converted properties. As HABC converts more of its public housing over to RAD, the number of households accepting choice mobility will increase. To affirmatively further fair housing, HABC should develop a mobility program for families who elect to move from public housing and RAD converted housing that provides robust tenant’s rights, to a voucher program that will include more financial and programmatic responsibilities, and to encourage families to reside in areas of opportunity. At a minimum, HABC should be able to identify the housing outcomes for families who elect Choice-Mobility vouchers.</p> | <p>No change to the Annual Plan. HABC is tracking the vouchers issued to participants in the Choice Mobility Program and is able to identify the housing outcomes for those who receive these vouchers.</p> |
| <p>16. The absence of a project cap on PBV authority raises significant integration issues for persons with disabilities. For example, HABC offered PBVs for half of all units of permanent supportive housing at a development. HABC has an obligation under <i>Olmstead</i> and other civil rights statutes to create the most integrated housing for persons with disabilities.</p> | <p>No change to the Annual Plan. The absence of a cap was announced in a previous Plan and has been implemented for the purpose of creating housing for specific populations, such as homeless persons. HABC is aware of its obligations under <i>Olmstead</i> and has issued project-based vouchers to a number of projects that provide integrative opportunities/settings for non-elderly persons with disabilities. HABC continues to comply with applicable Fair Housing laws.</p> |
| <p>17. The HCV Homeownership Program has regulations specific to persons with disabilities, particularly those earning only SSI level income. It is not clear how HABC’s Special Homeownership Vouchers would be modified to ensure families only receiving SSI level income would be able to access this program.</p> | <p>No change to the Annual Plan. Under HABC’s Reasonable Accommodations Policy, if an individual with a disability requires an accommodation, such as an accessible feature or modification to HABC policy, HABC will provide such accommodation, unless doing so would result in a fundamental alteration in the nature of the program or an undue financial or administrative burden.</p> |

| COMMENT RECEIVED | HABC RESPONSE |
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| <p>18. HABC should implement SAFMR final rule rather than reinvent a rule that has the same intent and purpose can be satisfied by implementing the SAFMR rule proposed by HUD.</p> | <p>No change to the Annual Plan.</p> |
| <p>19. Why does HABC believe it is necessary to revise uniform documents promulgated by HUD that have already been vetted for legal sufficiency? This seems like reinventing the wheel, and the cost savings associated with these activities seem miniscule and the documents will not have been vetted for legal sufficiency from the United States Department of Housing and Urban Development – potentially exposing HABC to liability on its regulatory obligations. Overall this appears a duplicative and redundant exercise.</p> | <p>No change to the Annual Plan.</p> |
| <p>COMMENTS ON THE PUBLIC HOUSING ADMISSIONS & COINTIUED OCCUPANCY POLICY</p> | |
| <p>20. HABC’s proposal to remove families who become ineligible for CAMPBWL based on family composition may raise fair housing and due process issues. Applicants to waiting-list have legal interests subject to due process and fair housing considerations. HABC’s proposal would proposal would appear to terminate that interest, on considerations that are discriminatory. For example, a family of one who has children while on the CAMPBWL waiting-list would potentially be removed from waiting-list based on the familial status. A non-discriminatory a would alternative would be to simply be to move the family to a waiting-list for which they are eligible and use their original application date.</p> | <p>No change to the ACOP.</p> |
| <p>21. The proposed changes to Chapter 10: Transfer policy are confusing. DRM would ask for clarification that if a public housing resident who moved from traditional public housing to a privately owned public housing site being treated as a new admission means that the resident must undergo the screening process a second time. If yes, DRM would object to such policy as a violation of <i>Bailey Supplemental Consent Decree</i> at paragraph 33(i).</p> | <p>No change to the ACOP. Privately-managed sites screen families moving from public housing for compliance with LIHTC financing rules.</p> |
| <p>COMMENTS ON THE HCVP ADMINISTRATIVE PLAN</p> | |

| COMMENT RECEIVED | HABC RESPONSE |
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| <p>22. Mainstream voucher policies in the Administrative Plan are inconsistent with the NOFA, HABC’s NOFA Application and PIH Notice 2020-01. HABC’s current FY 20 Admin Plan states that it will screen its current tenant-based waiting list for families that meet the eligibility for Mainstream vouchers, and that HABC will also accept referrals from partner agencies. Admin Plan, p. 4-4 & 4-5. However, in its NOFA application to HUD, HABC states that applicants for Mainstream vouchers will be selected from its tenant-based waiting, and “[i]f HABC does not have a sufficient number of applicants on the waiting list that qualify, HABC will open the waiting list, and will also accept referrals from partner agencies. In fact, the NOFA requires that PHAs allow individuals to apply directly to the PHA for Mainstream vouchers, stating “In addition to receiving referrals from partner agencies, the PHA must allow non-elderly persons with disabilities to apply directly to the program without going through a partner agency.” 2017 Mainstream NOFA, p. 2, 18. HABC must amend its Admin Plan to make clear that persons may apply directly to HABC for a Mainstream voucher.</p> | <p>No change to the HCVP Admin Plan. PIH Notice 2020-01 establishes the policy for how the Mainstream Vouchers should be administered. The HCVP Admin Plan is consistent with that Notice.</p> |
| <p>23. The NOFA awarded 10 points for PHAs that grant a preference in their Admin Plan for persons transitioning out of institutional settings, at serious risk of institutional settings, homeless, or at risk of homelessness. 2017 Mainstream NOFA, p. 28. HABC’s NOFA application states that it will create an admission preference for all four of those categories. NOFA Application, p. 38. In its FY 20 Admin Plan, HABC created admission preferences for these categories, but the preferences only apply to Mainstream vouchers. Admin Plan, p. 4-4. On January 22, 2020 HUD issued PIH Notice 2020-01, Revised Policies and Procedures for the Mainstream Voucher Program. This notice clarifies that admission preferences created pursuant to the NOFA must, ...[a]pply to all vouchers on the waiting list, not only Mainstream Vouchers.” PIH 2020-01, p. 3.</p> | <p>The following changes will be made to the HCVP Administrative Plan:</p> <p>In late 2018, HABC was awarded funding by HUD to support issuing eighty-nine (89) tenant-based vouchers through the Mainstream Voucher Program.</p> <p>The Mainstream Voucher Program provides assistance to non-elderly persons with disabilities that qualify for any one of the following preference categories:</p> <ol style="list-style-type: none"> 1. Transitioning out of institutional or other segregated settings; 2. At serious risk of institutionalization; 3. Homeless; or 4. At risk of becoming homeless. |

| COMMENT RECEIVED | HABC RESPONSE |
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| <p>HABC must amend its Admin Plan to make clear that the admission preferences for persons transitioning out of institutional settings, at serious risk of institutional settings, homeless, or at risk of homelessness apply to all vouchers.</p> | <p>The target beneficiaries or Voucher recipients for the Mainstream Voucher Program under this award are any household that includes one or more non-elderly persons with disabilities, <i>and</i> who fall under one of the above-listed preferences. The Residency Preference will continue to apply, meaning there will be a preference for non-elderly persons with disabilities residing in Baltimore City to receive the available HCVs. <u>These admission preferences are applicable to all applicants on the tenant-based waiting lists.</u></p> <p>HABC will screen its tenant-based waiting lists for non-elderly persons with a disability who meet the preferences defined within this subsection. Applicants, who meet the preference criteria, will be asked to come into HABC’s office for an eligibility determination and to apply all verified preferences as outlined in this chapter.</p> <p><u>If all Mainstream vouchers are being utilized, the family will receive a regular tenant-based voucher. If the family is not eligible for a Mainstream Voucher, they will be placed on the waiting list in accordance with their eligibility status as determined by the HCVP.</u></p> |
| <p>24. HABC’s intent behind this proposal is worthy and significant for people with disabilities and suggests a more specific approach to the issue. We request that HABC more carefully review federal regulations on this specific issue of absence from the unit. Federal regulations do not require the termination of a family’s participation from voucher program for absence from the unit for 180 days, nor does HABC’s administrative plan set a cause for termination for absence from the unit in its Administrative Plan. Federal regulations speak of termination of assistance from the unit. 24 C.F.R. 982.312(a) is not an identified grounds for a participants’ <i>termination</i> from the program, <i>see</i> 24 C.F.R. 982.552(c), but may be grounds for termination of a Housing Assistance Payment (HAP) contract. A HAP may terminate without affecting a participant’s eligibility for participation in the program as would be the case if a HAP terminated because</p> | <p>No change to the HCVP Admin Plan. HABC reviews termination from participation due to absence from the unit on a case-by-case basis. HABC’s Fair Housing Office addresses reasonable accommodation requests made by persons with disabilities to not terminate participation due to absence from the unit for 180 or more days.</p> |

| COMMENT RECEIVED | HABC RESPONSE |
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| of an owner's failure to meet Housing Quality Standards (HQS). | |