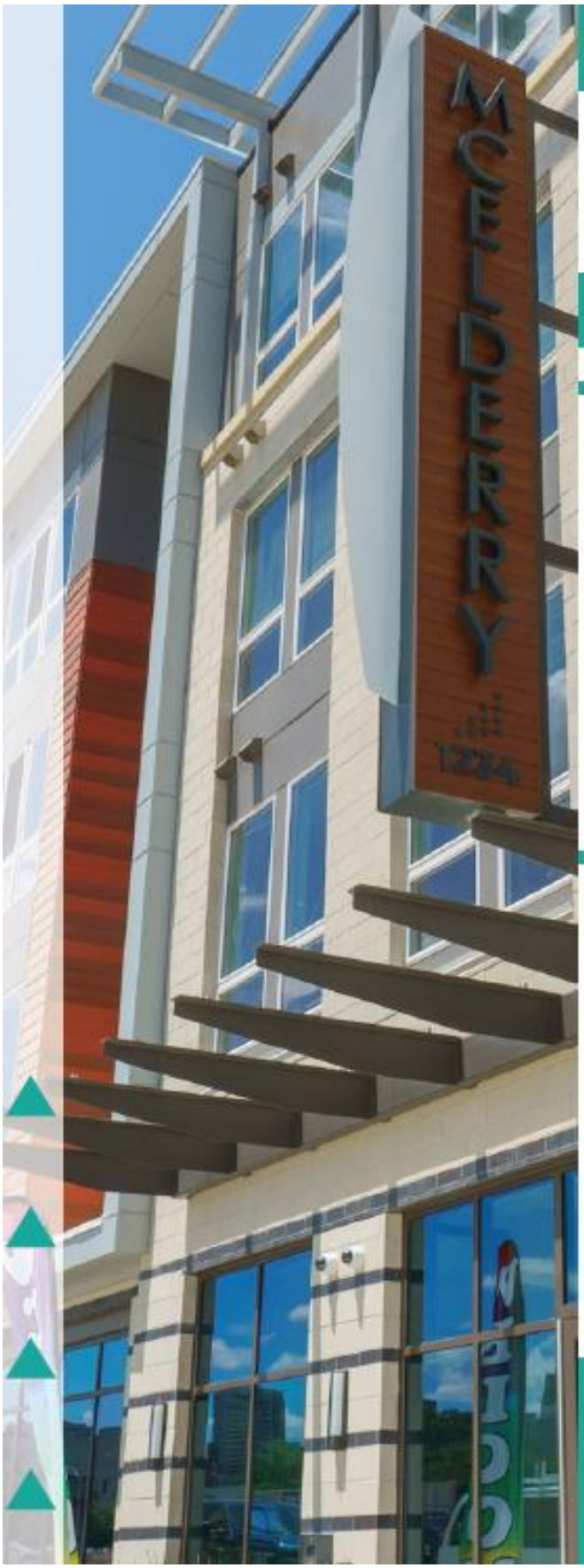

FY2021

THE MOVING TO WORK

ANNUAL REPORT

HOUSING AUTHORITY of BALTIMORE CITY

HABC IS GOING THE DISTANCE

Moving to Work Annual Report

Fiscal Year 2021

Submitted To:
U.S. Department of Housing & Urban Development
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I. Introduction and Overview

This Moving to Work (MTW) Annual Report provides information on the initiatives and strategies 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 and Report requirements, extends through December 31, 2028.

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. 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 Report, an "MTW activity" is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. The MTW activities undertaken by HABC in Fiscal Year 2021 were 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 outcomes for the fiscal year, the Annual Report includes outcomes for both MTW activities and other activities which do not specifically require MTW authority to implement.

B. MTW Long-Term Goals and Objectives

In 2021, HABC established a set of objectives under which to administer our programs and carry out key initiatives while continuing to respond to the ongoing COVID-19 pandemic. These four objectives are:

RESPOND: Throughout the year, HABC provided regular COVID-19 testing, set up multiple vaccination clinics for staff and residents and achieved an 89% vaccination rate among employees. To address the overwhelming need for affordable housing, HABC was awarded 278 Emergency Housing Vouchers from HUD, and 238 of these vouchers had been issued as of the end of the year. HABC also advocated for critical funding and other support on Federal, State and local levels to advance our programs and initiatives.

RETURN: HABC implemented a gradual return of staff that had been working remotely to their respective work sites in 2021, while prioritizing health and safety. At certain points, the emergence of new coronavirus variants made it necessary to reinstate full time telework for those who were able to remotely perform their duties. During this time, HABC was able to move forward with established goals and priorities while continuing our commitment to those we serve. HABC is planning for all staff return to the office in 2022.

REASSURE: HABC used a variety of communication platforms to stay engaged with staff, residents and partners and deliver the most up to date information on our programs, services and other important news. HABC worked to ensure residents and program participants remained stably housed during the pandemic by entering into repayment agreements and/or connecting them to rental assistance programs. HABC also partnered with Baltimore City, PCs for People and Comcast to host an event for residents and program participants to receive free laptops and mobile devices as well as internet services to keep tenants connected to online resources.

REINVENT: In 2021, HABC implemented new workplace practices to stay engaged with staff and those we serve, even while operating remotely. HABC streamlined processes such as recertifications and new applicant submissions through virtual platforms and continued to utilize waivers that remained available under the CARES Act until the end of the year to improve efficiency. In addition, along with our Choice Neighborhood implementation partners, HABC made tremendous progress with initiatives like the Pekins Somerset Oldtown (PSO) Transformation Plan by completing the new construction of 104 units in Somerset Phase 1 at 1234 McElderry, starting construction on Somerset Phases 2 and 3, and demolishing the first 100 units at Perkins Homes.

HABC will continue to use these objectives, as well as our Strategic Plan goals, to advance our mission and vision in 2022.

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 had, on average, 5,822 units leased each month in its public housing developments.

Voucher Utilization: HABC had, on average, 17,652 units under lease each month, including Thompson and all other programs.

Project-Based Voucher Utilization: In FY 2021 2,541 housing units were either under an Agreement to Enter into a Housing Assistance Payment Contract (AHAP) or leased in the Project-Based Voucher (PBV) program, including six new developments placed under AHAP or HAP during the fiscal year.

Capital Program: In FY 2021, HABC completed capital improvements at existing housing developments and scattered sites using MTW Block Grant funds totaling $33,792,980.

Development Program: HABC undertook development activities designed to support the revitalization of Baltimore neighborhoods and replace distressed and obsolete public housing developments. This includes completing the renovation of Hollander Ridge properties on March 8, 2021, which converted to RAD conversion on December 29, 2021. HABC also continued to implement the PSO Transformation Plan, which includes the demolition of 629 units at Perkins Homes that will be replaced with 652 newly constructed public housing units located throughout a new mixed-income community. The first phase of Perkins Homes demolition, comprised of 100 units, was completed on October 9, 2021. The PSO initiative has been made possible through a $30 million Choice Neighborhoods grant from HUD and will leverage approximately $1 billion of investment within the Transformation Plan 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 2021, HABC has closed on 26 RAD developments, consisting of 3,920 units, representing a total investment of $864.5 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 2022 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 continued 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: In FY 2021, HABC proposed the following new MTW activities:

- Emergency Waivers: HABC used 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 was used to waive certain requirements when completing reexaminations, conducting HQS inspections, extending FSS Contracts of Participation, or increasing payment standards under the Housing Choice Voucher Program (HCVP). Implementing the emergency waivers provided relief to both participants and HABC in navigating the challenges presented by the COVID-19 pandemic.

- Special Homeownership Vouchers: This activity was developed to allow HABC to utilize MTW authority to create and fund a limited number of Special Homeownership Vouchers (SHVs) for use by eligible low-income households who purchase a scattered site unit. Under this collaborative homeownership program, HABC will sell vacant scattered site properties to local community developers with the understanding that the renovated units must be sold to applicable, eligible HABC families. HABC continued to develop the design for the Special Homeownership Vouchers in 2021. Two local developers were engaged, and plans and agreements were in the process of being drafted to identify the rights and responsibilities of HABC and developers.

- Economic Stability, Growth and Transition Program (ESGT) for the Thompson Settlement Agreement: This activity was developed to modify and build on the Family Self-Sufficiency (FSS) program. The ESGT program uses milestones categorized in four tracks; education, career, financial health, and homeownership, and allows families to choose the track(s) in which to participate. In FY 2021, the Baltimore Regional Housing Partnership (BRHP) worked on planning and development for the program; however, implementation is not anticipated until FY 2022.

Office of Resident Services MTW Homeownership Programs: In FY 2021, HABC combined its Homeownership activities into a single HABC MTW Homeownership program. The program has two components, the first of which provides homeownership opportunities to eligible Public Housing and Housing Choice Voucher participants, as well as to eligible applicants. Under this first component, HABC sells scattered site properties selected based on best interests of the community and agency. In FY 2021, HABC completed renovations on six scattered site units. Two of the six properties were under contract at the end of FY 2021 with two additional properties expected to be under contract in FY 2022. The second component of the MTW Homeownership program, entitled Special Homeownership Vouchers, is discussed in the above section.

Homelessness Prevention Initiatives: The Housing First Homeless Initiative does not require MTW Authority as HABC provides up to 895 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. Of the 895 set aside vouchers, 195 have been set aside for project-based voucher units for homeless individuals, 50 are for homeless families with children under age 18 and 650 tenant-based vouchers are for homeless individuals and families. By the end of FY 2021, 849 of the 895 set-aside vouchers were either issued or leased.

The Homeless and Veterans Set Asides: Using its MTW authority, HABC awarded 182 PBV units designated to house homeless veterans. By the end of FY 2021, there were 56 of these units under construction and 19 units under contract. The remaining 107 PBV units for this program are no longer viable.

The Re-Entry Program: This program links permanent housing with supportive services to assist up to 250 ex-offender households. Referrals are made to HABC by MOHS. MTW Authority is not required for this initiative. At the end of FY 2021, 197 of these vouchers were issued and leased. The remaining vouchers will be issued upon receipt of applicable referrals.

Approved MTW Activities: HABC continued to implement an array of previously approved MTW activities that impacted 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 Report.

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 this MTW Report.

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

II. General Operating Information

A. Housing Stock Information

HABC is among the largest PHAs in the United States and serves low-income households through its Public Housing and Housing Choice Voucher programs, both of which are supported with MTW Block Grant funds.

This section of the Annual Report provides information on HABC's current inventory, leasing activities and waiting lists for both the Public Housing and HCV programs. It includes details on actual 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. Actual New Project-Based Vouchers

In FY 2021, as shown in Table 1. HABC entered into an AHAP/HAP contract for six new project-based developments, three of which are RAD conversions. One of the planned PBV developments was not placed under AHAP/HAP due to financing and weather-related delays.

Table 1: Actual New Project-Based Vouchers

Property Name	Number of Vouchers Newly Project-Based		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
22 Light Street Apts	2	2	Leased	No	2 LTA UFAS units located at 22 Light Street.
Perkins Homes – Phase 1	48	0		Yes Partially	20 units at Perkins Homes to be converted to PBV through RAD. 28 units to PBV
Ellicott Gardens II (Thompson)	0	14	Committed	No	A 70-unit project located in Ellicott City in Howard County, a second phase of an existing project.
Somerset 2 (520 Somerset Apartments)	0	44	Committed	Yes	44 RAD PBV units at PSO 520 Somerset Street
Somerset 2 (525 Aisquith Apartments)	0	23	Committed	Yes	23 RAD PBV units at PSO 525 Aisquith Street
Somerset 2 (525 Aisquith)	0	33	Committed	No	33 PBV Blend Units at PSO

Somerset 3 (420 Aisquith)	0	15	Committed	Yes	15 RAD PBV units at PSO
Total: Planned or Actual Newly Project-Based	**50**	**131**			

Describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:

Due to delays in financing and weather-related delays, the construction of the Perkins Homes Phase 1 PBV units has been postponed; and these units are now expected to come online 2023. The description of the units has also changed: there will be 28 PBV units (16-2bd, 12-3bd) and 20 RAD PBV units at this project at 1401 E Pratt Street.

Ellicott Gardens II was not included in the Plan; however, an AHAP was entered into during FY 2021.

Somerset 2 and Somerset 3 were not included in the Plan as HABC did not anticipate that they would enter into an AHAP in FY 2021; however, both did enter into AHAPs. The AHAP for Somerset 2 was effective on June 2, 2021, and the AHAP for Somerset 3 was effective November 23, 2021.

ii. Actual Existing Project-Based Vouchers

Table 2 includes the PBV units where at least an AHAP was in place by the beginning of FY 2021, including information on actual unit counts as of December 31, 2021.

Table 2: Actual Existing Project-Based Vouchers

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
18 W. Read St., Inc.	10	10	Leased	No	10 1bd NED units at 18 W. Read St.
1234 McElderry St	50	50	Leasing (as of 12/31/21, 36 of 50 were leased)	No	13 1bd, 24 2bd and 13 3bd units for PH replacement at 1234 McElderry St.
214 E. Biddle St.	5	5	Leased	No	5 1bd NED units at 214 E. Biddle St.
2301 N. Charles St., Inc.	7	7	Leased	No	2 efficiencies and 5 1bd NED/UFAS units at 2301 N. Charles St.
Alcott Place	28	28	Leased	No	28 1bd units at 2702 Keyworth Ave.
Artaban Ashburton Apartments	14	14	Leased	No	14 1bd NED units at 5906 Park Heights Ave.

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
Ashland Commons	12	12	Leased	No	12 1bd (8-NED) units at 1715 E Eager St.
Barclay	19	19	Leased	No	1 1bd, 1 2bd, and 17 3bd (1-NED, 4-UFAS) units at 2106-2234 Barclay St.
Barclay II (North Barclay Green)	15	15	Leased	No	11 1bd NED and 4 2bd UFAS units at 341 E. 20th St.
Barrister Court	8	8	Leased	No	2 efficiencies, 5 1bd, and 1 2bd UFAS unit at 1300 Washington Blvd.
Belvieu Gardens	10	10	Leased	No	10 1bd NED units at 3915-3921 Belvieu Ave.
Bellevieu Manchester	8	8	Leased	No	8 1bd units at 342 Bloom St.
Bennett House	25	25	Leased	No	24 SROs and 1 1bd unit at 14 E Franklin St. designated to provide supportive services to low-income residents
Bon Secours – Gibbons	20	20	Leased	No	12 1bd NEDs, 4 2bd and 4 3bd UFAS units at 900 Desoto Rd.
Bon Secours – New Shiloh	19	19	Leased	No	16 1bd (11-NED), 2 2bd and 1 3bd units at 1930 Windsor Ave. (8-PB Homeless)
Brexton Chase	7	7	Leased	No	7 1bd NED units at 241 W. Chase St.
Brick by Brick	2	2	Leased	No	2 1bd NED units at 903 Gorsuch Ave.
Butchers Row	9	9	Leased	No	3 1bd, 2 2bd, and 4 3bd units at E. Baltimore St.
Calvert Street Properties	18	18	Leased	No	18 1bd NED units at 1625 N. Calvert St.
Calverton House	14	14	Leased	No	13 SROs and 1 efficiency at 119 E. 25th St.
Chapel Green	20	20	Leased	No	8 1bd NED units and 12 3bd (4-UFAS) units at Chase, Wolfe, and Washington Streets
Cherry Hill Senior Housing	50	50	Leased	No	48 1bd NED units and 2 2bd UFAS units at 901 Cherry Hill Rd.
Cherrydale	32	32	Leased	No	32 1bd NED units at 1118 Cherry Hill Rd.
City Arts	11	11	Leased	No	11 1bd NED units at 440 E. Oliver St.

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
City Arts II	15	15	Leased	No	12 1bd NED and 3 2bd UFAS units at 1700 Greenmount Ave.
Clare Court Apartments	15	15	Leased	No	5 1bd, 7 2bd and 3 4bd (7-NED, and 3-UFAS) units at 3725 Ellerslie Ave.
Clarks Lane	6	6	Leased	No	6 1bd NED units at 3901 Clarks Ln.
Clarksview, LLC	8	8	Leased	No	8 1bd NED units at 3701-3711 Clarks Ln.
Coel-Grant Higgs	57	57	Leased	No	32 efficiencies and 25 1bd (6-UFAS) units at 1700 N Gay St.
Coleman Manor	49	49	Leased	No	49 1bd (8-NED, 5-UFAS) units at Walbrook Ave.
Columbus School Apts.	8	8	Leased	No	8 1bd units at 2000 E North Ave
Community Housing	6	6	Leased	No	1 efficiency, 1 1bd, 1 2bd, and 3 3bd scattered site units
Dayspring	18	18	Leased	No	17 2bd and 1 3bd transitional units at 1125 Patterson Park
DiMaggio Scattered Sites	23	23	Leased	No	8 2bd, 10 3bd, 4 4bd, and 1 5bd units designated for chronically homeless households at scattered sites
Dominion Properties	7	7	Leased	No	3 1bd NED units and 4 3bd units at 1617 Dukeland Ave., 6th St., Hilton and Monument Streets
Dorchester Apts.	10	10	Leased	No	10 1bd NED units at 4300 Liberty Heights Ave.
Druid Hill LTD	12	12	Leased	No	10 2 bd and 2 3bd units at 1621 Druid Hill Ave.
Druid House	19	19	Leased	No	8 2bd and 11 3bd units at McCulloh St.
Epiphany House	33	33	Leased	No	33 efficiencies at 5610 York Rd.
Fallstaff Apts.	4	4	Leased	No	2 1bd NED units, 1 2bd and 1 3bd (1-UFAS) units at 3800-3810 Fallstaff Rd.

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
Fells Point Station	14	14	Leased	No	11 1bd and 3 2bd (6-NED, 8-UFAS) units at 1621 Bank St.
Four Ten Loft Apts	20	20	Leased	No	20 - 1bd units at 410 N Eutaw St designated to homeless.
Franklin Flats	7	7	Leased	No	7 1bd NED units at 20 E. Franklin St.
Greenmount & Chase	19	19	Leased	No	19 units (11-1bd, 5-2bd, 3-3bd) consisting of 2 LTA NEDs, 2 LTA UFAS and 4 units designated for chronically homeless.
Greens at Irvington Mews	20	20	Leased	No	20 - 1bd NED units at 4300 Frederick Ave.
Harry & Jeannette Weinberg Place	88	88	Leased	No	85 efficiencies and 3 1bd units at 2500 W. Belvedere Ave.
Holden Hall	14	14	Leased	No	14 SRO units at 761 W. Hamburg St.
Indecco	9	9	Leased	No	2 efficiencies and 7 1bd units at 940 S. Lakewood Ave.
Independence Place	21	21	Leased	No	11 1bd and 10 2bd units designated for chronically homeless households at 4101½ Old York Rd.
Irvington Woods	57	57	Leased	No	11 1bd NED and 46 2bd units at 4102-4126 Potter St.
JByrd	3	3	Leased	No	3 1bd NED units at Windsor Mill Rd.
Jenkins House	22	22	Leased	No	20 SRO and 2 1bd units at 2226 Maryland Ave.
John Manley House	5	5	Leased	No	5 1bd NED units at 5304 Harford Rd.
Keys Pointe – Phase 1B	34	34	Leased	No	19 1bd, 8 2bd, 4 3bd and 3 4bd (11-NED, 4-UFAS) units at Cardiff, Jarmon, Hornell, Boston and Gallop Streets
L on Liberty	14	14	Leased	No	14 1bd (all NED) units at 216 N Liberty St.
Lillian Jones Apts.	22	22	Leased	No	14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303 Greenmount Ave.

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
M on Madison	23	23	Leased	No	23 1bd NED units at 301 W. Madison St.
Marian House	8	8	Leased	No	4 SRO and 4 3bd units at 949 Gorsuch Ave.
Marian House II	5	5	Leased	No	5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave.
Mary Harvin Center	8	8	Leased	No	8 1bd units at 1600 N. Chester St.
Metro Heights at Mondawmin	18	18	Leased	No	13 1 bd, 2 2bd and 3 3 bd (10-NED, 1-UFAS) units, some designated for chronically homeless households at 2700 Reisterstown Rd.
Milford Station	6	6	Leased	No	6 1bd NED units at 3900 W. Northern Pkwy.
Moravia	60	60	Leased	No	57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr.
Mount Royal Apts.	5	5	Leased	No	5 1bd units at 1512 W. Mt. Royal Ave.
Mulberry at Park Apts.	19	19	Leased	No	11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St.
North Barclay Green III	12	12	Leased	No	9 1bd units and 3 3bd UFAS units at E. 21st St. and Greenmount Ave.
North Avenue Gateway	16	16	Leased	No	11 1bd NED units and 5 2bd units at 3001-3003 W. North Ave.
North Avenue Gateway II	16	16	Leased	No	10 1 bd NED units and 6 1bd units at 3044 W. North Ave designated for chronically homeless.
Oaks at Liberty	45	45	Leased	No	45 1bd units at 3501 Howard Park Ave.
O'Donnell Heights	42	42	Leased	No	16 1bd (12-NED) units, 12 2bd units, 13 3bd units, and 1 4bd unit (4-UFAS)
Orchard Ridge I-V	197	197	Leased	No	119 1bd units, 42 2bd units, 32 3bd units, 3 4bd units and 1 5bd unit (52-NED, 27-UFAS) at Orchard Ridge Blvd., Green Rose and Maple Shade Dr.

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
Paca House	82	82	Leased	No	41 efficiencies and 41 1bd units at 116 N. Paca St. 63 units are designated for homeless and 19 units for veteran populations.
Parktown-Cason Arms	12	12	Leased	No	8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave.
Penn North	15	15	Leased	No	14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave.
Penn Square II	15	15	Leased	No	12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave.
Parkwood	3	3	Leased	No	3 1bd NED units at scattered sites
Poppleton II	15	15	Leased	No	11 1bd NED units and 4 3bd UFAS units at 838 W. Fairmount Ave.
Poppleton III	10	10	Leased	No	7 1bd NED units, 1 2bd UFAS and 2 3bd UFAS units at 866 W. Fayette St.
Pratt Street	35	35	Leased	No	27 2bd and 8 3bd units at 1700 W Pratt St. – transitional housing
Restoration Gardens	43	43	Leased	No	40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave.
Restoration Gardens II	42	42	Leased	No	42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd.
Seminole Apartments	6	6	Leased	No	6 1bd NED units at 4300 Seminole Ct.
Sharon Towers	10	10	Leased	No	10 2bd units at 4-6 N. Carey St.
Sharp Leadenhall	4	4	Leased	No	4 1bd units (3-UFAS) at Race and West Streets
Sojourner at Argyle Apartments	12	12	Leased	No	12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St.
St. Stephens	15	15	Leased	No	15 1bd NED units at 3900 Roland Ave.

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
St. Vincent DePaul	9	9	Leased	No	8 2bd and 1 3bd units at Ulman Ave.
St. Vincent DePaul	5	5	Leased	No	1 3bd and 4 4bd units designated for chronically homeless households at Bond St. and Cottage Ave.
Symphony Home at Purdue	6	6	Leased	No	6 1bd units at 5683 Purdue Ave.
Union Ave. – Buena Vista Apartments	48	48	Leased	Yes	15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave.
Uplands	62	62	Leased	No	24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln.
Walbrook Mills Apts	1	1	Leased	No	1 3bd (UFAS) unit at 2636 W North Ave.
Wayland Village	45	45	Leased	No	45 1bd (14-NED) units at 3020 Garrison Blvd.
Weinberg Family Center – 1209 Rose	8	8	Leased	No	5 2bd and 3 3bd units designated for chronically homeless households at 1209 N. Rose St.
Weinberg Family Center – Guadenzia at Park Heights	18	18	Leased	No	14 2bd and 4 3bd units designated for chronically homeless households at 4613 Park Heights Ave
Weinberg Manor East	75	75	Leased	No	10 SRO, 41 efficiencies, and 24 1bd units (10-NED, 5-UFAS) at 3601 Fords Ln.
Weinberg Manor South	14	14	Leased	No	14 1bd NED units at 3617 Fords Ln.
Westminster House	163	163	Leased	No	103 efficiencies, 55 1bd, and 5 2bd units at 524 N. Charles St.
Berger Square (Thompson)	0	10	Leased	No	A project located in Odenton in Anne Arundel County, near transit, employment centers near Fort Meade and Arundel Mills, and close to the MARC station.

Property Name	Number of Project-Based Vouchers		Status at End of FY 2021	RAD?	Description of Project
	Planned	Actual			
Burgess Mills (Thompson)	0	20	Leased	No	A 198 unit mixed-income project located in Ellicott City in Howard County.
Scattered Sites - Pilatus Opportunity Fund (Thompson)	0	30	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites - Harford Home Rentals (Thompson)	0	10	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites – Fort 700 (Thompson)	0	5	Leased	No	Scattered site units in high-opportunity areas throughout the region.
Homes at Fountain Green (Thompson)	0	10	Leased	No	New construction in Harford County, of which 10 units will be BRHP project-based units. Project is currently at 97% construction completion and leasing will begin in coming month
Total	**2,325**	**2,410**			

Describe differences between the Planned and Actual Existing Number of Vouchers Project-Based

Thompson PBVs were inadvertently left out of the Plan and have been added to the report.

iii. Actual Other Changes to MTW Housing Stock in the Plan Year

Public Housing

This section of the report includes information on changes to the public housing inventory in FY 2021, including capital expenditures and the status on development activities for sites where redevelopment, conversion, homeownership, demolition, disposition and management improvements took place in FY 2021. HABC's asset review of its scattered sites inventory continues to provide a roadmap and framework for demolition and/or disposition of obsolete units.

Table 3 below provides a total of HABC's actual public housing inventory as of the end of FY 2021. The public housing inventory varies from year to year as a result of public housing units being converted to long-term project-based assistance under the RAD and other factors. See Appendix B for a listing of HABC Owned ACC units, HABC Owned Non-ACC units, RAD/LTA Units Non-HABC Owned units, LTA Bailey and Non-Bailey Units.

Table 3: Public Housing Inventory

	Units as of 12/31/2021
MTW Public Housing Units	6,039 Available Units 7,081 ACC units

HABC did not add any new units to the public housing inventory in FY 2021. The information below describes the actions undertaken in FY 2021 regarding new public housing units.

Actual New Public Housing Units

In FY 2021 HABC acquired three of the ten planned scattered site properties which are currently under construction and are part of the Bailey Supplemental Consent Decree.

Actual Public Housing Units Removed

The following demolition/disposition-related activities took place in FY 2021:

- The first 100 units at Perkins Homes were demolished as part of Perkins Phase 1 of the PSO Transformation Plan. Demo/dispo applications for the remaining 529 units will be submitted to HUD in FY 2022.
- 94 units at Hollander Ridge were converted under RAD to project-based voucher assistance. Construction was completed in March 2021 and conversion to PBV was completed in December 2021.
- 100 units were removed under Somerset Phase 2, 67 of which were converted to RAD PBV and 33 were converted to PBV.
- 15 units were removed under Somerset Phase 3, all of which were converted to RAD PBV.
- 100 scattered site units were sold to either the Mayor and City Council (MCC) of Baltimore City or other third-party purchasers for redevelopment. Of these, 71 were sold by being bundled and auctioned as part of HABC's scattered sites strategy. Many of the removed units are still in final stages of the sale and recording process, which must take place before they can be removed from our inventory in PIC.

Table 4: Units Removed

PIC Dev.#/AMP PIC Dev. Name	Number of Units Demo/Dispo'd in 2021	Actual Outcome in 2021
MD002/0003A Perkins Phase 1	100	100 units demolished in 2021 as part of PSO Transformation Plan.
MD002/0207 Hollander Ridge RAD Conversions	94	RAD conversion to PBRA
MD002/0003B & 0003J Somerset Phase 2 RAD Conversion	100	Conversion to PBV: 67 units to RAD PBV and 33 units to PBV. Units under AHAP in FY 2021
MD002/0003C Somerset Phase 3 RAD Conversion	15	RAD Conversion to PBV: 15 units to RAD PBV Units under AHAP in FY 2021
MD002/0203 Scattered Sites 203 2126 Druid Hill Ave.	1	Sold to neighbor on December 30, 2021
MD002/0202 Scattered Sites 202 2428 Linden Ave.	1	Sold to third-party developer on June 3, 2021
MD002/0200 Scattered Sites 200 412 E. Chase St.	1	Sold to MCC to build a football field on December 6, 2021
MD002/0201 Scattered Sites 201 1425 Darley Ave.	1	Sold to a third party on November 1, 2021
MD002/0202 Scattered Sites 202 2574 McCulloh St.	2	Sold to a third-party developer for FMV on June 30, 2021
MD002/0203 Scattered Sites 203 2416 W. Franklin St.	1	Sold at auction on April 16, 2021
MD002/0202 Scattered Sites 202 1320 N. Mount St.	1	Sold at auction on April 20, 2021
MD002/0202 Scattered Sites 202 1326 N. Mount St.	1	Sold at auction on April 20, 2021

PIC Dev.#/AMP PIC Dev. Name	Number of Units Demo/Dispo'd in 2021	Actual Outcome in 2021
MD002/0202 Scattered Sites 202 1634 Ashland Ave.	1	Sold at auction on May 28, 2021
MD002/0203 Scattered Sites 203 3018 Grantley Ave.	1	Sold at auction on June 7, 2021
MD002/0203 Scattered Sites 203 1816 Wilhelm St.	1	Sold at auction on June 7, 2021
MD002/0203 Scattered Sites 203 2558 Hollins St.	1	Sold at auction on June 7, 2021
MD002/0203 Scattered Sites 203 2105 Hollins St.	1	Sold at auction on June 7, 2021
MD002/0202 Scattered Sites 202 1412 N. Fulton Ave.	1	Sold at auction on June 7, 2021
MD002/0203 Scattered Sites 203 1717 Ruxton Ave.	1	Sold at auction on June 9, 2021
MD002/0203 Scattered Sites 203 3212 W. Belvedere Ave.	1	Sold at auction on June 24, 2021.
MD002/0203 Scattered Sites 203 1921 Hollins St.	1	Sold at auction on June 30, 2021
MD002/0202 Scattered Sites 202 1426 N. Fulton Ave.	1	Sold at auction on July 7, 2021
MD002/0202 Scattered Sites 202 706 Cumberland St.	1	Sold at auction on July 9, 2021
MD002/0202 Scattered Sites 202 712 Cumberland St.	1	Sold at auction on July 9, 2021
MD002/0202 Scattered Sites 202 726 Cumberland St.	1	Sold at auction on July 9, 2021
MD002/0202 Scattered Sites 202 1113 Greenmount Ave.	1	Sold to MCC on July 9, 2021
MD002/0202 Scattered Sites 202 2217 Druid Hill Ave.	2	Sold to MCC on July 9, 2021

PIC Dev.#/AMP PIC Dev. Name	Number of Units Demo/Dispo'd in 2021	Actual Outcome in 2021
MD002/0203 Scattered Sites 203 2916 Oakley Ave.	1	Sold to MCC on July 9, 2021
MD002/0203 Scattered Sites 203 5332 Beaufort Ave.	1	Sold to MCC on July 9, 2021
MD002/0203 Scattered Sites 203 5358 Cordelia Ave.	1	Sold to MCC on July 9, 2021
MD002/0203 Scattered Sites 203 4901 Queensbury Ave.	1	Sold to MCC on July 9, 2021
MD002/0203 Scattered Sites 203 347 S. Fulton St.	1	Sold at auction on July 22, 2021
MD002/0202 Scattered Sites 202 523 Bloom St.	1	Sold at auction on July 22, 2021
MD002/0203 Scattered Sites 203 1813 W. Pratt St.	1	Sold at auction on July 22, 2021
MD002/0203 Scattered Sites 203 1848 Eagle St.	1	Sold at auction on July 22, 2021
MD002/0203 Scattered Sites 203 2426 Franklin St.	1	Sold at auction on July 22, 2021
MD002/0203 Scattered Sites 203 108 N. Wheeler Ave.	1	Sold at auction on July 23, 2021
MD002/0203 Scattered Sites 203 221 N. Monroe St.	1	Sold at auction on July 23, 2021
MD002/0203 Scattered Sites 203 530 N. Pulaski St.	1	Sold at auction on July 23, 2021
MD002/0202 Scattered Sites 202 1517 Edmondson Ave.	2	Sold at auction on July 23, 2021
MD002/0203 Scattered Sites 203 632 Denison St.	1	Sold at auction on July 28, 2021
MD002/0202 Scattered Sites 202 1406 W. Franklin St.	1	Sold at auction on August 6, 2021

PIC Dev.#/AMP PIC Dev. Name	Number of Units Demo/Dispo'd in 2021	Actual Outcome in 2021
MD002/0202 Scattered Sites 202 1816 W. Lanvale St.	1	Sold at auction on August 6, 2021
MD002/0202 Scattered Sites 202 1015 N. Arlington Ave.	1	Sold at auction on August 9, 2021
MD002/0202 Scattered Sites 202 1418 W. Franklin St.	2	Sold at auction on August 10, 2021
MD002/0203 Scattered Sites 203 612 Glenolden Ave.	1	Sold at auction on August 12, 2021
MD002/0203 Scattered Sites 203 2434 W. Franklin St.	1	Sold at auction on August 16, 2021
MD002/0203 Scattered Sites 203 1803 W. Mulberry St.	1	Sold at auction on August 16, 2021
MD002/0203 Scattered Sites 203 2806 Edmondson Ave.	1	Sold at auction on August 19, 2021
MD002/0201 Scattered Sites 201 525 Beaumount Ave.	1	Sold at auction on August 20, 2021
MD002/0200 Scattered Sites 200 1535 Holbrook St.	1	Sold at auction on August 20, 2021
MD002/0202 Scattered Sites 202 540 Laurens St.	1	Sold at auction on August 23, 2021
MD002/0201 Scattered Sites 201 2004 E. North Ave.	1	Sold at auction on August 24, 2021
MD002/0203 Scattered Sites 203 1814 Braddish Ave.	1	Sold at auction on August 25, 2021
MD002/0203 Scattered Sites 203 2040 Hollins St.	1	Sold at auction on August 25, 2021
MD002/0201 Scattered Sites 201 2232 E. Oliver St.	1	Sold at auction on August 24, 2021
Scattered Sites 403 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021

PIC Dev.#/AMP PIC Dev. Name	Number of Units Demo/Dispo'd in 2021	Actual Outcome in 2021
Scattered Sites 405 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
Scattered Sites 407 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
Scattered Sites 409 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
Scattered Sites 411 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
Scattered Sites 413 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
Scattered Sites 415 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
Scattered Sites 417 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
Scattered Sites 419 E. 21 ½ St.	1	Lot sold to MCC on August 27, 2021
MD002/000200 Scattered Sites 200 1012 E. North Ave.	1	Sold at auction on August 30, 2021
MD002/0203 Scattered Sites 203 236 N. Fulton Ave.	1	Sold at auction on September 1, 2021
MD002/0203 Scattered Sites 203 612 S. Fulton Ave.	1	Sold at auction on September 3, 2021
MD002/0203 Scattered Sites 203 2402 W. Baltimore St.	1	Sold at auction on September 3, 2021
MD002/0203 Scattered Sites 203 1618 Gorsuch Ave.	2	Sold at auction on September 9, 2021
MD002/0203 Scattered Sites 203 300 S. Pulaski St.	1	Sold at auction on September 13, 2021
MD002/0203 Scattered Sites 203 1925 W. Lombard St.	1	Sold at auction on September 13, 2021
MD002/0203 Scattered Sites 203 307 N. Stricker St.	1	Sold at auction on September 15, 2021
MD002/0203 Scattered Sites 203 2843 W. North Ave.	1	Sold at auction on September 15, 2021
MD002/0203 Scattered Sites 203	1	Sold at auction on September 17, 2021

PIC Dev.#/AMP PIC Dev. Name	Number of Units Demo/Dispo'd in 2021	Actual Outcome in 2021
28 N. Mount St.		
MD002/0202 Scattered Sites 202 1408 N. Fulton Ave.	1	Sold at auction on September 21, 2021
MD002/0203 Scattered Sites 203 2157 Hollins St.	1	Sold at auction on September 21, 2021
MD002/0202 Scattered Sites 202 1113 N. Stricker St.	1	Sold at auction on September 27, 2021
MD002/0202 Scattered Sites 202 2362 McCulloh St.	1	Sold at auction on September 28, 2021
MD002/0203 Scattered Sites 203 303 S. Payson St.	1	Sold at auction on October 12, 2021
MD002/0203 Scattered Sites 203 333 S. Stricker St.	1	Sold at auction on October 19, 2021
MD002/0203 Scattered Sites 203 2511 McHenry St.	1	Sold at auction on October 19, 2021
MD002/0201 Scattered Sites 201 1709 N. Collington St.	1	Direct sale to third party on October 21, 2021
MD002/0203 Scattered Sites 203 1346 N. Fremont Ave.	1	Sold at auction on November 26, 2021
MD002/0203 Scattered Sites 203 2845 W. Lafayette Ave.	1	Sold at auction on November 26, 2021
MD002/0202 Scattered Sites 202 1620 N. Gilmor St.	1	Sold at auction on November 30, 2021
MD002/0203 Scattered Sites 203 2133 W. Mulberry St.	1	Sold at auction on November 30, 2021
MD002/0203 Scattered Sites 203 1107 Walnut Ave.	1	Sold at auction on December 3, 2021
MD002/0202 Scattered Sites 202 822 N. Fulton Ave.	2	Sold at auction on December 7, 2021
MD002/0203 Scattered Sites 203	1	Sold at auction on December 7, 2021

PIC Dev.#/AMP PIC Dev. Name	Number of Units Demo/Dispo'd in 2021	Actual Outcome in 2021
2408 Lauretta Ave.		
MD002/0202 Scattered Sites 202 940 W. Franklin St.	1	Sold at auction on December 7, 2021
MD002/0203 Scattered Sites 203 548 N. Payson St.	1	Sold at auction on December 13, 2021
MD002/0201 Scattered Sites 201 1739 Carswell St.	1	Sold to MCC on March 25, 2021
MD002/00203 Scattered Sites 203 4226 Park Heights Ave.	1	Sold to MCC on March 25, 2021
MD002/0201 Scattered Sites 201 1900 Kennedy Ave.	1	Sold to MCC on March 25, 2021
MD002/0203 Scattered Sites 203 2103 Chelsea Terrace	2	Sold to MCC on March 25, 2021
MD002/0203 Scattered Sites 203 1821 Eagle St.	1	Sold to MCC on March 25, 2021
TOTAL	**409**	

Rental Assistance Demonstration Program

As of the end of FY 2021, HABC is still in the process of converting a significant portion of its public housing portfolio to long-term Project Based Voucher and/or Project Based Rental Assistance (PBRA) under the RAD program. To date, HABC has received approval from HUD to convert 46 sites for a total of 5,872 ACC units under RAD. As of December 31, 2021, HABC has completed 26 RAD transactions, converting a total of 3,920 units to the RAD program. Hollander Ridge, one of the approved RAD site transactions, closed on December 29 2021, resulting in the conversion of 94 public housing units to PBV units. Somerset Phases 2 & 3 also closed during 2021. Somerset 2 closed on June 30, 2021, and Somerset 3 closed on November 23, 2021. Both projects make up two of the nine PSO mixed-income housing phases which consists of a total of 136 Public housing replacement units. Of the 136 public housing replacement units, 82 units have been converted to PBV units.

Table 5 provides a list of public housing developments that have already undergone RAD conversions.

Table 5: Completed RAD Conversions by December 31, 2021

Property Name	No. of Units Converted	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	15-Nov	HUD approved certification of completion	5/12/2015	10/27/2015
BE Mason	223	PBRA	15-Nov	HUD approved certification of completion	5/12/2015	10/27/2015
Bel Park Tower	253	PBRA	15-Nov	HUD approved certification of completion	5/12/2015	10/27/2015
Brentwood	150	PBRA	15-Dec	HUD approved certification of completion	5/12/2015	10/27/2015
Broadway Overlook	84	PBRA	17-Aug	HUD approved certification of completion	10/26/2016	1/26/2017
Chase House	189	PBRA	16-Dec	HUD approved certification of completion	5/12/2015	10/27/2015
Ellerslie	117	PBRA	17-Feb	HUD approved certification of completion	10/26/2016	1/26/2017
Govans Manor	191	PBRA	16-Nov	HUD approved certification of completion	10/26/2016	1/26/2017
Hillside Park	30	PBRA	17-Dec	Under review by HUD for certification of completion	12/1/2017	6/29/2018
Hollins House	130	PBRA	15-Nov	HUD approved certification of completion	5/12/2015	10/27/2015
Lakeview Tower	302	PBRA	15-Nov	HUD approved certification of completion	5/12/2015	10/27/2015
McCulloh Extension	347**	PBRA	16-Nov	HUD approved certification of completion	5/12/2015	10/27/2015
Primrose Place	125	PBRA	16-Feb	HUD approved certification of completion	5/12/2015	10/27/2015
Pleasant View Gardens Senior	110	PBRA	16-Jul	HUD approved certification of completion	5/12/2015	10/27/2015
Pleasant View Gardens Townhomes	201	PBRA	16-Sep	HUD approved certification of completion	5/12/2015	10/27/2015

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Senior Townes at the Terraces	47	PBRA	17-Nov	HUD approved certification of completion	10/26/2016	1/26/2017
Wyman House	168	PBRA	15-Dec	HUD approved certification of completion	5/12/2015	10/27/2015
Heritage Crossing	75	PBRA	18-Nov	Construction completed September 2019; HUD approved certification of completion	12/1/2017	6/29/2018
J. Van Story Branch Apts	350***	PBRA	18-Nov	Construction completed December 2020; HUD approved certification of completion	12/1/2017	6/29/2018
Monument East	170	PBRA	18-Oct	Construction competed February 2020; HUD approved certification of completion	12/1/2017	6/29/2018
Rosemont Tower	203	PBRA	19-Sep	Construction completed July 2021; HUD approved certification of completion	12/1/2017	6/29/2018
Scattered Sites (Thompson 58/Broadway Homes)	58	PBRA	19-May	Construction completed October 2020; HUD approved certification of	4/12/2017	12/27/2017
Hollander Ridge	94	PBV	21-Dec	Construction completed March 2021	7/1/2020	9/21/2020
Somerset Ph 2	67	PBV	21-Jun	Projected Completion May 2023	7/1/2020	9/21/2020
Somerset Ph 3	15	PBV	21-Nov	Projected Completion April 2023	7/1/2020	9/1/2020
Somerset Extension	57	PBRA	20-Dec	Projected completion of construction in 1Q 2022	12/1/2017	6/29/2018

Property Name	No. of Units Converted	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
TOTAL	3,920					

**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*

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

HABC implemented a wide range of capital investments at existing public housing sites as summarized on Table 6. The COVID-19 pandemic continued to have a significant impact on implementation and completion of work, causing delays or suspension of work due to health and safety considerations. There were also delays experienced in delivery and availability of materials and equipment due to manufacturing and logistics issues. Contractor availability and their associated staffing issues also delayed contracting and implementation of a number of projects.

Table 6: Actual Capital Expenditures During the Plan Year

No.	Development Name	Description of Work	FY 2021 Actual Expenditures
1.	Latrobe Homes	Repairs to Heating System, Install Security Cameras and Lighting, Replace Lighting in Crawlspaces & Basements, Maintenance Office Renovation, Domestic Water System Repairs, Site Work, Vacancy Renovations	$1,988,165
2.	McCulloh Homes	Vacancy Renovations, Replace Lighting in Crawlspaces & Basements, Wall Repairs, Custom Sign Installation, Backflow Preventers and Sump Pumps, Gas Piping Upgrade, Install Low Flow Faucet Aerators, Install Electric Meters, LED Lighting Upgrade	$2,157,728
3.	Perkins Homes	Blocking of Doors and Windows, Site Prep, Relocation, Demolition, Infrastructure, Redevelopment of Phase III (Perkins 1) 94 Units, Phase V (Perkins 2A) 100 Units, Phase V (Perkins 2B) 100 Units	$3,525,468

No.	Development Name	Description of Work	FY 2021 Actual Expenditures
4.	Poe Homes	Vacancy Renovations, Office Expansion	$358,040
5.	Douglass Homes	Vacancy Renovations, Install Window and Security Screens in Mgmt. Bldg., Replace Lighting in Crawlspaces & Basements, Install Domestic Hot Water Generators, Radiator and Piping Repair/Replacement, Replace Street and Building Signage, Lead Component Abatement, Ceiling Repairs, Water Conservations Installations, LED Lighting Upgrade	$2,498,332
6.	Gilmor Homes	Window Replacement, Heating Repairs, Salvage and Reinstall Convectors, Replace Lighting in Crawlspaces & Basements, Upgrade Electrical Cabinets on Exterior Building, Staff Parking Area, Relocation, Building Signage	$2,064,762
7.	O'Donnell Heights	Vacancy Renovations, Repairs to HABC owned Roadway and Sidewalk, Vacancy Renovations	$1,265,215
8.	Cherry Hill	Vacancy Renovations, Replace Lighting in Crawlspaces & Basements, Upgrade Electrical Cabinets on Exterior Building, HVAC System Replacement, Replace Street and Building Signage, Mailbox Installation, Site Repairs	$3,239,820
9.	Brooklyn Homes	Vacancy Renovations, Security Cameras and Lighting Installation, Entry Door Replacement, Repairs to HABC Owned Alleys and Roads and Sidewalks, Install Window Security Screens (not all units)	$1,014,727
10.	Westport	Vacancy Renovations, Installation of A/C unit at the Community Center, Stair and Rail Replacement at the Community Center	$178,931
11.	Mt. Winans	Install Low Flow Faucet Aerators, LED Lighting Upgrade	$16,794
12.	Rosemont	Gas Distribution System Piping Vacant Building Close-Up Entrance Wall Removal/Replacement	$86,975

No.	Development Name	Description of Work	FY 2021 Actual Expenditures
13.	Somerset Ext	Redevelopment Phase II (Somerset 2) 197 Units, Phase IV (Somerset 3) 64 Units	$272,812
14.	Scattered Sites	Vacancy Renovations, Roof Replacements, Parking Lot Expansion, Exterior Repairs, Install Low Flow Faucet Aerators, Install Outdoor Efficient Lighting, Install Energy Conservation, Remove Trees and Overgrown Vegetation	$2,859,737
15.	NEDS	Incentives for Non-Elderly Disabled Units (Bailey 10)	($25,859)
16.	Somerset Extension	RAD Subsidy	$188,786
17.	Latrobe, Poe Homes, Gilmor Homes, Cherry Hill Homes, Brooklyn Homes, Westport (EPC 1 Sites)	Sub Metering Maintenance and Service	$2,250
18.	Authority-Wide	A & E and Environmental Consulting Fees	$558,493
19.	Authority-Wide	Legal, Planning, Information Technology and Utility Consulting Fees, etc.	$1,805,414
20.	Central Office	Technical Salaries and Benefits	$905,668
21.	Central Office	Non-Technical Salaries and Benefits	$1,418,868
22.	Central Office	Resident Meetings and Training	$46,227
23.	Central Office	Admin and Operating Costs, Overhead, Sundry and Audit Fees	$553,666
24.	Central Office	Debt Service - 1st Phase EPC	$6,811,961
		GRAND TOTAL	**$33,792,980**

504 Accessibility Improvements

As of December 31, 2021, HABC has created in excess of 756 units that meet the UFAS requirements for wheelchair accessibility. These units have been created, certified and made available for occupancy pursuant to the Bailey Consent Decree.

All of HABC's mixed population properties have been converted to private ownership and management under RAD. The new owners have renovated or are in the process of renovating the units and common areas. Additional UFAS units were created at certain RAD sites. As a result, new UFAS certifications were received for two RAD sites: Govans and Primrose Place, totaling an additional six certified UFAS units in FY 2021. All of the units in the RAD properties that are

subsidized by 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

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

Even with issues and delays due to the ongoing pandemic, significant progress was made on a number of work items, as described in Table 6.

Safety & Security Initiatives

In 2021, HABC created and filled a Security Operations Manager position to address crime and safety issues at our public housing developments. A security assessment was performed at all of our sites, which resulted in new and improved public safety initiatives. Throughout the year, the Security Operations Manager worked to strengthen our partnerships with the Baltimore City Police department and other City agencies to collaborate on efforts such as gaining easier access to crime reports and reducing illegal dumping. In addition, CCTV cameras at a number of HABC sites were upgraded, and we are now able to monitor camera activity remotely from a laptop.

Development Initiatives

HABC utilized 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 development initiatives follows.

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, 670 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. Renamed Key's Pointe, Phase 1 is complete and includes 144 affordable housing units. A disposition application for the six single-family lots that were included in Phase 1 to be redeveloped for future homeownership is expected to be submitted to HUD in FY 2022.

A Master Development Agreement between HABC and the developer for Phase 2 was executed in the 4th quarter of 2021. The Phase 2 area consists of 27 vacant acres and is expected to be developed in four sub-phases. The redevelopment will incorporate recommendations from the neighborhood revitalization plan that was undertaken jointly by HABC and Baltimore City Planning Department for O'Donnell Heights and three adjacent communities. It includes a central park as part of the Phase 2 redevelopment. A final public meeting for the revitalization plan for the four communities was held on October 23, 2021, and the plan received final approval from the Baltimore City Planning Commission on December 2, 2021. Throughout 2021, HABC staff continued to participate in monthly neighborhood meetings to discuss implementation of the revitalization plan and to provide updates on O'Donnell Heights redevelopment.

Bailey Supplemental Decree Units

Ten additional units for non-elderly persons with disabilities will be created through the acquisition and rehabilitation of units in neighborhoods identified in the Bailey Supplemental Decree. Acquisition of these units continue to be a challenge due to the COVID-19 pandemic, along with higher home prices than anticipated and increased market competition. During 2021, HABC was able to acquire three units, 3990 Roland Ave. (1 dwelling unit) and 718 W. 36th St. (2 dwelling units). All units are undergoing rehabilitation and are expected to be leased up by the end of the 2nd quarter of 2022.

Thompson Settlement Agreement

Under the Thompson Settlement Agreement, BRHP continued implementing a development program to create project-based units in communities of opportunity. This initiative was started under the Thompson partial consent decree. Under this initiative, BRHP's goal is to create 30 new project-based units in communities of opportunity, 20 of which were to be located in scattered sites units in high-opportunity areas throughout the region. The remaining 10 units are planned as part of a new construction project in Towson, Maryland called Red Maple Place; however, the units are still not under AHAP due to delays related to community opposition to the project. Red Maple Place will contain 56 units, 10 of which will be BRHP project-based units. Additionally in FY 2021, 10 multi-family project-based units were created in Bel Air, Maryland at Homes at Fountain Green. Ellicott Gardens II, located in Howard County, Maryland closed in 2021 and will

contain a total 70 units, of which 14 will be multi-family project-based units projected to be completed in 2024.

Hollander Ridge HOPE VI Project

HABC has acquired and rehabilitated 94 scattered site units in Baltimore City as identified in the Thompson Settlement Agreement. At least 5% of the units acquired under the Hollander Ridge Revitalization Plan to were set aside to meet the federal accessibility requirements for wheelchair users and it has been determined that five units will be wheelchair accessible. HABC also required the developer to make 2% of the Hollander Ridge units hearing vision/compliant.

The mixed-finance closing occurred in the 2nd quarter of 2020. All Hollander Ridge units were completed on March 8, 2021. HABC converted the 94 Hollander Ridge units to RAD on December 29, 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 PS0 Transformation Plan. The PSO Transformation Plan includes the demolition of the existing 629 Perkins Homes public housing units and the creation of approximately 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 mixed income housing includes 652 replacements units; 369 market rate units and 329 LIHTC units, plus two additional 80/20 buildings that are projected to be comprised of 429 total market rate units and 107 LIHTC units serving 50% AMI or less.

In 2021, HABC received HUD approval for and completed the demolition of the first 100 units in Perkins Phase 1. 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 (Somerset Ph 1, 2 and 4) and includes an additional phase (Somerset 3) to be completed off-site on an adjacent parcel. Thus far, HABC has ground-leased Somerset Homes Phases 1-3 sites to a single purpose entity controlled by Somerset Redevelopment, LLC. Somerset 2, comprised of 196 units, closed on June 3, 2021. 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, known as Somerset 3, 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 and closed on November 23, 2021. The redevelopment of

Somerset Homes will also include the construction of a new community park, known as the Nathaniel McFadden Learn and Play Park, and a network of new public streets resulting in a more pedestrian friendly, walkable community. Construction of Somerset Phase 1, comprised of 104 rental units, was completed on September 30, 2021.

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 new construction strategy for Poe Homes. Poe Homes consists of 288 public housing units that will be converting to a PBRA or PBV under the RAD platform.

HABC delivered a Choice Neighborhoods Transformation Plan to HUD on September 3, 2020, which included a housing plan for the Poe Homes property. The plan was formally accepted by HUD on January 5, 2021. A Master Development Agreement was executed in February 2021 between HABC and a Joint Venture team consisting of The Michaels Organization and AHC of Greater Baltimore. In November 2021, the Board of the Housing Authority's non-profit developer entity authorized a resolution and approved funds to raze the building at 901 West Mulberry Street, the development site for Phase 1A of the Poe Homes project.

The other component of the Choice Neighborhoods grant was for "Action Activities" i.e. low-cost, high-impact capital improvement funds for projects in the Poppleton and Hollins Market neighborhoods near the Poe Homes property. HUD approved a Release of Grant Funds for the following projects in October 2021:

- Action Activity 1: Greater Model Park – new Splash Pad in Poppleton;
- 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 (food tenant fit-outs);
- 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).

HABC and Baltimore City received the first four applications from low- and moderate-income homeowners to utilize "Action Activity 2" funds in December 2021. To date, a roof replacement at 725 Vine St. in Poppleton was approved and subsequently completed with these funds.

B. Leasing Information

i. Actual Number of Households Served

Table 7 provides information on the MTW households projected to be served by HABC staff as of the end of FY 2021.

Table 7: Actual Number of Households Served at the End of FY 2021

Planned Number of Households Served Through:	Number of Units Months Occupied/Leased		Number of Households Served	
	Planned	Actual	Planned	Actual
MTW Public Housing Units Leased	65,436	69,860	5,453	5,822
MTW Housing Choice Vouchers (HCV) Utilized*	177,252	152,032	14,771	12,669
MTW Thompson Housing Choice Vouchers**	52,152	51,310	4,346	4,276
Local, Non-Traditional: Tenant-Based	0	0	0	0
Local, Non-Traditional: Property-Based	0	0	0	0
Local, Non-Traditional: Homeownership	0	0	0	0
Planned and Actual Totals	**294,840**	**273,202**	**24,570**	**22,767**

**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*

Describe any differences between the planned and actual households served:

- **MTW PH:** Public Housing units leased exceeded forecasted utilization. This is due in part to the utilization of CARES Act Waivers through the end of the year, which streamlined the leasing process, making it faster and more efficient. Additionally, HABC procured a general contractor to perform work necessary to turn vacant units. Prep work was performed both by contractors and HABC site staff, which helped to reduce the time it took to make units ready for occupancy.

- **MTW HCV:** Initial planned number of UMLs was reported as 177,252 (14,771 vouchers) in the FY 2021 MTW Annual Plan; however, this was in error as it included non-MTW vouchers. The correct planned UMLs should have been 167,808 (or 13,984 vouchers). The difference between the corrected planned UMLs and actual UMLs leased is due to Baltimore County absorbing approximately 500 HABC vouchers on behalf of HABC port-outs to their jurisdiction, high terminations from death, and low utilization in the first half of 2021.

- **MTW Thompson:** The planned UML for 2021 is based on our forecast of vouchers issued and lease timeframes. Due to longer leasing times occurring mid-year, BRHP had to decrease voucher issuance to avoid a potential over-leasing situation. Due to adoption of CARES Act waivers, vouchers search times were extended and tight market conditions contributed to slower overall leasing.

Table 8: Local, Non-Traditional Housing Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Number of Units Months Occupied/Leased		Number of Households Served	
		Planned	Actual	Planned	Actual
Tenant-Based	N/A	0	0	0	0
Property-Based	N/A	0	0	0	0
Homeownership	N/A	0	0	0	0
Planned and Actual Totals		**0**	0	0	0

Table 9: Households Receiving Local, Non-Traditional Services Only

Program Name/Services Provided	Average Number of Households Per Month	Total Number of Households in the Plan Year
N/A	0	0

Table 10 provides information on Non-MTW vouchers leased during FY 2021. This table is not a requirement of Attachment B to the Standard MTW Agreement.

Table 10: Actual Number of Non-MTW Households Served at the End of FY 2021

Number of Households Served Through:	Number of Unit Months Occupied/Leased		Number of Households Served	
	Planned	Actual	Planned	Actual
NEDs II	456	340	38	28
VASH	6,600	5,806	550	484
FUP	1,188	1,093	99	91
Section 8 Mod/Rehab	1,200	1,248	100	104
Planned and Actual Non-MTW Households Served	9,444	8,487	787	707

ii. Discussion of Any Actual Issues/Solutions Related to Leasing

Table 11 provides a summary of issues that could impact HABC's projected leasing activity, along with potential solutions.

Table 11: Actual Issues and Solutions Related to Leasing

Housing Program	Description of Actual Leasing Issues and Solutions
MTW Public Housing	While HABC exceeded its leasing forecast for FY 2021, challenges remain and continue to be addressed. Move outs and leasing were impacted as a result of COVID-19 restrictions and safety concerns. In addition, a number of units located in certain areas within public housing developments are more difficult to lease due to safety and security issues in those specific areas. HABC undertook several measures to address hard to lease units, decrease applicants' time on the waiting list and lease-up families faster and more efficiently, including: • Hired a Security Operations Manager in 2021, who conducted thorough assessments of each site and is working to implement new safety initiatives. • Utilized the MOU between HABC and the Baltimore City Police Department to obtain information and reports about crime committed on public housing property. • Continued utilization of the CARES Act waivers that remained available until December 31, 2021, which helped to streamline and speed processing time. • Consolidated the new admission process and developed an app in which applicants can access and submit paperwork conveniently, thereby making the review process more efficient. • Entered into repayment agreements with families that were behind on their rent and entered into a partnership with the United Way of Central MD to access Emergency Rental Assistance Program funding. HABC will continue to find ways to streamline the leasing process, address vacancies and assist families to remain stably housed.
MTW Housing Choice Voucher	All of the following impacted HABC's leasing numbers in FY 2021. Baltimore County absorbed approximately 500 HABC vouchers on behalf of HABC port-outs to their jurisdiction. Additionally, HABC had a higher than usual number of EOPs related to death. Finally, applicants were not able to find units which also impacted leasing. HABC, developed a leasing incentive activity to encourage owner

Housing Program	Description of Actual Leasing Issues and Solutions
	participation in the program and has also issued more vouchers to address utilization.
Thompson Vouchers	Due to adoption of CARES Act waivers, vouchers search times were extended and tight market conditions contributed to slower overall leasing.
Local Non-Traditional	N/A

C. Waiting List Information

i. Actual Waiting List Information

HABC maintains its waiting lists 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 12 provides a summary of required waiting list information.

Table 12: Actual Waiting List Information

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Status (Open, Partially Open or Closed)	Was the Waiting List Opened During the Plan Year?
Federal MTW Public Housing Units	Community Wide	18,090	Closed	No
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	15,058	Closed	No
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	6,294	Partially Open	PB Senior WL was opened through 2021. PB NEDs WL opened on 12/8/21.
RAD Choice Mobility	Program Specific	296	Open	Continuously Open
Thompson Vouchers *	Program Specific	13,827	Closed	No

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

Describe any duplication of applicants across waiting lists:

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

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

Waiting List Name	Description of Actual Changes to the Waiting List
MTW Housing Choice Voucher Waiting List	HABC extended the application period for the Project-Based Senior Waiting List. The waiting list remains open.
MTW Public Housing Waiting List	HABC, due to the Pandemic, did not withdraw any households from the waiting list in FY 2021 except where requested or where criminal records resulted in denial. All other applicants pulled from the waiting list and not offered units were placed in a suspended status. Follow up, per HABC policy, will be completed in the upcoming year.
RAD Choice Mobility Waiting List	In FY 2021, HABC set aside 227 vouchers for the Choice Mobility option. 190 vouchers were issued and 91 leased in FY 2021.

D. Information on Statutory Objectives and Requirements

Under the MTW Agreement between HABC and HUD, HABC is required to meet certain statutory objectives and other requirements, and to report on them in the MTW Annual Report. The tables below provide the required information.

i. 75% of Families Assisted Are Very Low Income

In FY 2021, within the Public Housing and HCV programs, approximately 97% of households served were very low income, i.e. households with incomes at or below 50% of Area Median Income. HUD verifies this data through HABC's electronic submissions under HUD's PIC system. Table 13 is required by HUD; however, as noted, HABC did not operate any local, non-traditional programs in FY 2021.

Table 13: Local Non-Traditional Households and Income Levels

Income Level	Number of Local, Non-Traditional Households Admitted in the Plan Year
80% - 50% Area Median Income	0
49% - 30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households Admitted	0

ii. Maintain Comparable Mix

Table 14: Baseline Mix of Family Sizes Served

BASELINE MIX OF FAMILIES SERVED UPON ENTRY TO MTW					
Family Size	**Occupied Number of Public Housing units**	**Utilized HCVs**	**Non-MTW Adjustments**	**Baseline Mix Number**	**Baseline Mix Percentage**
1 Person	5,371	5,764	0	11,135	50%
2 Person	1,908	2,295	0	4,203	19%
3 Person	1,350	1,849	0	3,199	14%
4 Person	826	1,275	0	2,101	9%
5 Person	413	629	0	1,042	5%
6+ Person	288	490	0	778	3%
TOTAL	10,156	12,302	0	22,458	1

Describe the justification for any "Non-MTW Adjustments" given above:

N/A

Table 15: Mix of MTW Family Sizes Served in FY 2021

Family Size	Baseline Mix Percentage	Number of MTW Households Served in Plan Year*	Percentage of MTW Households Served in Plan Year *	Percentage Change from Baseline Year to Current Plan Year*
1 Person	50%	8135	47%	-3%
2 Person	19%	3762	22%	3%
3 Person	14%	2641	15%	1%
4 Person	9%	1552	9%	0%
5 Person	5%	752	4%	-1%
6+ Person	3%	523	3%	0%
TOTAL		17365		

*Percentages were rounded

Describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:

There are no variances which are greater than 5% between the Plan Year and the Baseline Year..

iii. Number of Households Transitioned to Self-Sufficiency in the Plan Year

HUD requires information on households transitioned to self-sufficiency for any MTW activities that report on HUD's standard metric SS #8. The table below provides the HUD-required information.

Table 16: Number of Households Transitioned to Self Sufficiency

MTW Activity Name/Number	Number of Households Transitioned to Self-Sufficiency	MTW PHA Local Definition of Self Sufficiency
Activity 2006-04 Family Self Sufficiency Program Enhancements	13	Self-sufficiency is defined at graduation from the FSS program.
	0	**Household duplicated across MTW Activities**
	13	**Total Households Transitioned to Self Sufficiency**

III. Proposed MTW Activities

All proposed MTW activities that were granted approval by HUD are reported in Section IV as "Approved Activities".

IV. Approved MTW Activities: HUD Approval Previously Granted

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.

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.

A. Implemented Activities

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

Plan Year Approved, Implemented, Amended

- HCV Program: Two-year recertifications approved FY 2006 and implemented FY 2007. Three-year recertifications implemented FY 2014.
- Public Housing: Approved FY 2006 and implemented FY 2011. Placed on hold FY 2014 and reactivated FY 2016.
- Verification Threshold PH: Approved and implemented in FY 2020.

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. During periods of declared emergencies, HCVP will waive the limit on voluntary 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 $2,400 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.

Impact

In FY 2021, the streamlined recertification activity continued; however, as a result of the COVID-19 pandemic, regular recertifications were delayed and the HCV limit on voluntary interim recertifications was lifted. HABC continues to conduct on-line recertifications for the HCV program. The COVID-19 pandemic also impacted recertifications for public housing residents. In response, HABC placed lock-boxes at every site to allow residents to safely provide recertification materials.

Hardship

HABC has 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.

In FY 2021, in response to the COVID-19 pandemic, HABC temporarily lifted the limit on interim recertifications and as such, there were no hardship requests.

Actual Non-Significant Changes

As a result of the COVID-19 declared state of emergency, HABC waived the limit on voluntary interim recertifications.

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021.

Challenges in Achieving Benchmarks and Possible Strategies

In PH, the number of regular recertifications was higher than anticipated due the increase in utilization over the forecast for FY 2021. Additionally, regular recertifications increased as a result of completion of the backlog on recertifications due to the pandemic. HCV utilization was below forecast, and as such, the number of regular recertifications decreased. Interim recertifications were above forecast as a result of lifting of the limit on interim recertifications to respond to family financial hardship during the pandemic.

Metrics

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 regular recertifications** 3,086 X 2.5 hours/recert = 7,715 hours x $30.77/ hour = $237,391	PH: $315,085 4,096 regular recertifications 4,096 X 2.5 hours/recert = 10,240 hours x $30.77/ hour = $315,085	No

		HCV: $515,644 6,703 regular recertifications** X 2.5 hours/recert = 16,758 hours X $30.77/ hour = $515,644	HCV: $446,165 5,800 regular recertifications X 2.5 hours/recert = 14,500 hours X $30.77/ hour = $446,165	Yes
	Limit on Interims ***			
	HCV: $45,509 HCV: Interims performed: 3,231 Time per interim: 45 min. Hourly wage: $18.78	HCV: $22,370 HCV: Interims performed: 969 Time per interim: 45 min. Hourly wage: $30.77	HCV: $35,939 HCV: Interims performed: 1,557 Time per interim: 45 min. Hourly wage: $30.77	No

**The baseline reflects pre-RAD conversions and therefore represents more households.*
***The benchmark represents 50% of planned households served.*
**** ** Does not reflect interim recertifications for increases in contract rent.*

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 regular recertifications completed X 2.5 hours/recert = 7,715 hours HCV: 16,758 hours 6,703 regular recertifications X 2.5 hours/recert = 16,758 hours	PH: 10,240 4,096 regular recertifications 4,096 X 2.5 hours/recert = 10,240 hours HCV: 14,500 hours 5,800 regular recertifications X 2.5 hours/recert = 14,500 hours	No Yes
	Limit on Interims**			

	HCV interims: 3,231 Time per interim: 45 min. HCV time on interims: 2,423 hours	727 HCV time spent on interims 969 interims x 45 min/interim HCV time spent on interims	1168 HCV time spent on interims: 1,557 interims x 45 min/ interim HCV time spent on interims	No
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.* * Does not reflect interim recertifications for increases in contract rent.*				

Activity #2006-02 Enhanced Project Based Voucher Program

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

Plan Year Approved, Implemented, Amended

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

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 populations 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 195 PBVs for the chronically homeless and 182 PBVs for homeless veterans; however, only 75 of the 182 units will be placed under contract.

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.

Impact

In FY 2021 there were 81 total referrals from the MOHS which resulted in 61 successful lease-ups. By the end of FY 2021, 205 PBV units were leased through MOHS referrals which continues to provide much needing housing for this vulnerable population.

Where other PBV units were concerned, in FY 2021, there were 6 new PBV AHAP/HAP contracts representing 131 new PBV units. One hundred twenty-nine (129) of the 131 units are under AHAP and the remaining 2 units are under contract and leased. Also in FY 2021, 24 units which were committed at the start of the fiscal year, were placed under HAP contract by the close of the fiscal year – 20 PBV units at Greenmount Chase and 4 PBV units at 410 Lofts.

Where HABC had planned on forty-eight PBV units under RAD for Perkins Homes Phase I, this contract was delayed as a result of RAD financing and COVID-19 related issues.

Also in FY 2021, HABC used the flexibility which waives the independent entity requirements for units owned by HABC.

Hardship

Where PBV units are targeted for homeless individuals or veterans, in place tenants, 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.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021.

Actual Changes to Metrics/Data Collection

The benchmark for HC #1 was incorrectly stated as 464 units; however, only 50 new PB units were planned for FY 2021. The benchmark was updated to reflect the number of planned new PBV units. The benchmark for HC #5 was incorrectly set at 541 and was revised to reflect the number of planned PBV units targeted for MOHS referrals which was 377 (182 PBV for homeless veterans and 195 PBV units for homeless families.

Actual Significant Changes

No significant changes were made in FY 2021.

Challenges in Achieving Benchmarks and Possible Strategies

Due to delays in financing and weather, the construction of the Perkins Homes – Phase 1 project was postponed, and the units are now scheduled to come online in FY 2023. Twenty-four units which were committed at the start of the fiscal year, went under contract at the close of the fiscal year. (50 planned: 2 new PBV units went under contract and were leased and 24 units previously under AHAP went under contract)

Metrics

HC #1: Additional Units of Housing Made Available				
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	50 units	26 units	No
**Represents new PB units which came online in the current Plan year.*				

HC #4: Displacement Prevention				
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	50 units	26 units	No
**Represents new PB units which came on line in the current Plan year.*				

*HC #5: Increase in Resident Mobility(Agency Specific Metric)**				
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	377 households	205 households	No
**Metrics reflect the portion of the activity related to the total families leased as a result of referrals from MOHS*				

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.

Impact

In FY 2021 BRHP maintained its biennial recertification frequency and implemented the use of DocuSign via email to complete recertifications for the majority of households.

Hardship Policy

BRHP's maintained its current policy which allows residents to request an interim change at any point during the recertification cycle for loss of income. There were no hardship requests in FY 2021.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

Increase in recertifications is due to the program more than doubling in size since implementation.

Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	$23,350	$28,425	**Recertifications completed**: 1,904 **Staff time per recertification**: 1.5 hours **Average staff hourly salary**: $28.51 **Total cost:** $81,424	No
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	934 hours	1,126	**Recertifications completed**: 1,904 **Staff time per recertification**: 1.5 hours **Total staff time: 2,856**	No
CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease).	5% *This activity was implemented in 2007; however, the data was not tracked until 2015.	5%	0%	Yes

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.

Impact

In FY 2021, outreach, enrollment and participation in the FSS program continued to be impacted the COVID-19 pandemic. A total of 276 families participated in the FSS program and thirteen (13) participants graduated with two of the thirteen being eligible for homeownership. The average escrow among graduates with escrow in FY 2021 was $9,503.21 and the average escrow among all FSS participants with escrow in FY 2021 was $4,734. Regarding training and education, in FY 2021 thirteen participants enrolled in education programs and seven participants enrolled in job training.

While every year there are FSS success stories, one stands out and involves a participant who joined FSS in 2018. Within three years she had successfully completed all of her goals including her ultimate goal of becoming a homeowner. While the road to homeownership was not easy, this participant purchased the home she was renting under the guidance and leadership of FSS staff. Additionally, this participant obtained her Learner's permit in 2021 and graduated the FSS program with escrow. This is an example of the full breadth of accomplishments which can be realized through FSS.

HABC implemented a program of financial incentives for completion of interim goals as well as a requirement for all FSS participants to open a bank account. The following table includes the data on incentives paid in FY 2021. Results were impacted by the COVID-19 pandemic

Incentive Description	Number of Incentives Provided in FY 2020
• Obtain an education or vocational certification: $500 (max of $1,000)	0
• Open a bank account with an accredited financial institution within the first year of program participation: $50	0
• Complete the budgeting series "Your Money, Your Goals" within the first year of program participation: $50	0

Incentive Description	Number of Incentives Provided in FY 2020
• Complete an interim contract goal (other than education/vocation): $100 (max $200)	5
• Complete Career Development Boot Camp within the first year of program participation: $100	0

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021; however, there were some data issues which impacted the data universe for the metrics. A total of 276 families received services; however, the data obtained reflected only 225 families.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

The continued impact of COVID-19 affected outcomes on employment, job training, subsidy, participation levels and welfare assistance. As gathering restrictions slowly lift and families are able to return to work and job training; HABC anticipates benchmarks will be met. HABC continue to look for new ways to conduct outreach and provide case management so that online contacts can replace some of the face-to-face meeting requirements.

Metrics

SS #1: Increase in Household Income*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase)	$13,908	$14,227	HCV: $24,662 PH: $22,113	Yes
**Baseline represents average earned income for households with earned income in FY 2019. Benchmark indicates an increase of 2.3% growth.*				
SS #2: Increase in Household Savings*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of escrow of households affected by this policy in dollars (increase)	$4,099	$4,193	$4,734	Yes
**Baseline reflects average escrow for households with escrow at the end of FY 2019.*				
SS #3: Increase in Positive Outcomes in Employment Status*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Unemployed	202	224 56%	140 62%	No
Employed PT or FT	164	176 44%	85 38%	No
Enrolled in Education	10	11 3%	13 5%	Yes
Enrolled in Job Training	30	33 8%	7 2%	No
**Baseline reflects households enrolled in FSS during FY 2019.*				
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease)	34	37 9%	24 11%	No
**Baseline represents FSS households receiving TANF benefits at the end of FY 2019.*				
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	400	276	No
**Baselines were established in FY 2020 report.*				
SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline***	**Benchmark**	**Outcome**	**Benchmark**

				Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	$956	$956	$964	No
**Baselines were established in FY 2020 report. Equals Average HAP to Owner.*				
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	**Baseline ****	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total Household contributions towards housing assistance (increase).	$280	$280	$268	No
**Represents Tenant Rent to Owner.* ***Baselines were established in FY 2020 report.*				
SS #8: Households Transitioned to Self Sufficiency*				
Unit of Measurement	**Baseline****	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self-sufficiency (increase).	0	17	13	No
**Self-sufficiency is defined as graduation from the FSS program.*				

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 are set between 90% and 135% of the HUD published Fair Market Rent. The payment standards are 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 uses 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 offers each participant 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 requires a participant contribution towards the security deposit of between $200 and $500 dollars, which is adjusted seasonally to encourage leasing in summer months.

BRHP may provide 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, BRHP may utilize this flexibility in the future.

Impact

In FY 2021, BRHP developed and implemented a database tool for use in analyzing applicable housing market trends and together with the updated Fair Market Rents, determine the appropriate payment standard. Additionally, staff are able to enter a unit address and the software tool will auto-populate with the applicable payment standard. Implementation of these automation tools has resulted in substantial time savings.

As of FY 2021, owner incentives, payment of application fees, moving costs and payment of ongoing counseling fees were not implemented; however, BRHP still plans to implement and provide these important activity components.

Hardship Policy

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.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

As a result of the challenges faced due to the COVID-19 pandemic, there were fewer moves to opportunity neighborhoods in FY 2021.

Metrics

CE #1: Agency Cost Savings – Payment Standards				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	$5,131.50 in FY 2014*	$2,750	$508 17 hours x $29.86 hourly rate	Yes
**The data for the Payment Standards portion of the activity was not tracked until 2014 when savings had already been realized.*				
CE #2: Staff Time Savings – Payment Standards				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	155.5 hours in FY 2014*	80 hours	17 hours	Yes

The data for the Payment Standards portion of the activity was not tracked until 2014 when savings had already been realized.				
CE #5: Increase in Agency Rental Revenue – Payment Standards*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total household contributions towards housing assistance (increase).	$365.65	$423	$465	Yes
Metric represents average TTP.				
HC #5: Increase in Resident Mobility – Payment Standards & Security Deposit				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Payment Standards: 0 Security Deposit Assistance: 300	Payment Standards: 525 Security Deposit Assistance: 325	Payment Standards: 484 Security Deposit Assistance: 129	No
HC #7: Households Assisted by Services that Increase Housing Choice – Security Deposit				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase).	300	325	484	Yes

Activity #2009-01: MTW Homeownership Program
Combined with 2021-02 Special Homeownership Program

Plan Year Approved, Implemented, Amended

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

Description/Update

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

The key features of the MTW Homeownership program are described below.

<u>MTW Homeownership Program</u>

Eligible Purchasers – Eligible purchasers include public housing residents, HCV Program voucher holders, and applicants on the public housing and/or 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.

Eligible Properties – HABC scattered site properties are eligible for purchase under this program. The determination of which properties are eligible for homeownership will be made solely by HABC based on its assessment of the best interests of the community and the agency.

Property Feasibility – HABC limits the scope of repairs and renovations of units disposed of directly by HABC to eligible purchasers to $75,000 per unit, which may be increased by HABC to accommodate renovations related to disability accessibility or rehabilitation of properties within historic districts. Notwithstanding this limit, the rehabilitation costs cannot be more than 1/3 of the appraised value after rehab.

Second Mortgages – Subject to funding availability, HABC may offer non-cash, non-interest bearing second mortgages to eligible homebuyers up to 25% of the after-rehab appraised value of the property, which may be increased to up to 50% on a case-by-case basis or in extenuating circumstances. HABC second mortgage assistance may be made only after eligible homebuyers

have obtained a first mortgage commitment to the fullest extent that their incomes allow. HABC requires that second mortgages be paid back in full during or after the first mortgage has been paid in full, if the property or any part of the land thereof is refinanced, or if ownership is transferred or sold.

Closing Costs – HABC may match 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.

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

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

Decelerated Assistance – To ease the transition from subsidized homeownership assistance, HABC implements a schedule of decelerated assistance for an additional five years at the end of the family's applicable HCV Homeownership assistance term. Decelerated assistance is available to participants in with HCV Homeownership Vouchers as well as participants with Special Homeownership Vouchers. The decelerated assistance schedule is as follows:

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

<u>Special Homeownership Vouchers</u>

As part of the MTW Homeownership Program, HABC utilizes MTW flexibility to create and fund a limited number of Special Homeownership Vouchers (SHV) for use by eligible low-income

households who purchase a scattered site unit. SHVs differ from regular Housing Choice Voucher (HCV) Program vouchers in the following respects:

Eligibility – Eligibility for SHVs is limited to low-income households participating in and meeting the income and other criteria of HABC's MTW Homeownership Program who purchase a scattered site unit from HABC or its authorized Purchase and Resale Entities. Households receiving an SHV are not eligible for a second mortgage through the MTW Homeownership Program.

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

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

*Utility Allowance*s – SHV participants are not eligible for utility allowances.

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

Impact

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

In FY 2021, HABC completed renovations on six scattered site units including new windows, roofs, gutters and heating and electrical upgrades. Two of the six properties are currently under contract with two additional properties expected to be under contract in early 2022. Also in FY 2021, eleven properties were identified for homeownership and are awaiting HUD disposition approval. Eleven families have expressed interest in these properties and once approval is obtained, HABC will begin the qualification process. The MTW Homeownership program is

providing affordable homeownership opportunities and enabling families to fulfill their goals of homeownership.

Also in FY 2021, HABC continued to develop the design for the Special Homeownership Vouchers. Two local developers were engaged, and plans and agreements are being drafted to identify the rights and responsibilities of the HABC and developers.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

HABC has combined approved MTW Activities #2009-01 (MTW Homeownership Program) and #2021-02 (Special Homeownership Vouchers) into a single activity as they are interrelated components of HABC's MTW Homeownership Program. In FY 2021, HABC updated and modified certain features of the approved Section 32 Homeownership Plan. No additional MTW waivers were required to implement these changes: All program features are described in the Description/Update section of this activity.

Actual Changes to Metrics/Data Collection

Metrics were updated to reflect the combined Homeownership activities

Actual Significant Changes

No significant changes were made in FY 2021.

Challenges in Achieving Benchmarks and Possible Strategies

COVID-19 placed significant constraints on construction costs, the availability of materials and the ability to gather contractors and staff, all of which impacted renovation and the availability of units for homeownership. HABC has and continues to identify candidates for homeownership activities and will work to gain disposition approvals and complete renovations to make additional units available for sale.

Metrics

HC #1: Additional Units of Housing Made Available				
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 households	14 households	6 households	No
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)	3 households	14 households	4 households	No
HC #6: Increase in Homeownership Opportunities				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households that purchased a home as a result of this activity (increase)	3 households	14 households	4 households	No
HC #7: Number of Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase)*	366 households	400 households	284 households	No
**Represents total number of households participating in FSS.*				

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.

Impact

In FY 2021 HABC continued to implement this activity and require that households lease units that are consistent with their voucher size. HABC received 45 requests for larger units as a result of reasonable accommodations and approved 30 of those requests. There were no requests for larger units outside of reasonable accommodations.

Hardship Policy

Exceptions to this rule may be granted at the discretion of HABC where the voucher holder can demonstrate that a good faith and exhaustive effort have been made to find an appropriately sized unit or based on a reasonable accommodation request. In FY 2021 no requests were received outside of Reasonable Accommodation requests for larger unit size exceptions.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were met in FY 2021.

Metrics

*CE #1: Agency Cost Savings**				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	$142,007,010	$139,982,010	$130,702,272	Yes
**Represents total HAP expenditures.*				
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?***
Total time to complete the task in staff hours (decrease).	0 hours	0	0	N/A
**HUD is requiring HABC to track this metric. This metric does not accurately measure the success of this activity. HABC intended for this activity to save the Agency money and it has no influence on staff time.*				
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	0	N/A
**HUD is requiring HABC to track this metric. This metric does not accurately measure the success of this activity. HABC intended for this activity to save the Agency money and it has no influence on error rates.*				
*HC #1: Additional Units of Housing Made Available**				
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 the activity (increase).	11,817 units	11,871	12,669	Yes
**Represents households assisted.*				

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

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

Description/Update

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

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

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

HABC created an amendment to the HAP contract that sets forth requirements for the Bailey LTA PB units. The amendment increased the term of the contract to 40 years, consistent with the long-term affordability period and set forth what public housing rights, privileges and benefits must be afforded the residents in Bailey LTA PBV Program units. By the end of FY 2021, there were 272 Bailey LTA units under contract. No additional units came online in FY 2021.

Impact

Each of these Bailey units, upon completion, will provide much needed affordable units for persons with disabilities.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021.

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

Benchmarks for this activity were met in FY 2021.

Metrics

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a better unit as a result of the activity (increase).	0 units	261	272	Yes

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.

Impact

In FY 2021, BRHP completed 1,933 inspections which resulted in staff time savings and greater inspection efficiencies.

Hardship Policy

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

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were met in FY 2021.

Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	$70,031	$104,135 Inspections completed: 2,150 Staff time per inspection: 1.5 Average staff hourly salary: $32.29	$93,625 Inspections completed: 1,933 Staff time per inspection: 1.5 Average staff hourly salary: $32.29	Yes
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	1,869 hours	Inspections completed: 2,150 Staff time per inspection: 1.5 Total time savings Hours: 3,225	Inspections completed: 1,933 Staff time per inspection: 1.5 Total time savings Hours: 2,900	Yes

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, BRHP 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 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.

Impact

In FY 2021 this activity continues to provide cost savings benefits to both tenants and staff by excluding certain sources of income, streamlining deductions and simplifying the calculation of income and deductions.

Hardship Policy

HABC applies its financial hardship policies to households who demonstrate hardship due to application of these policies. In FY 2021 there were no requests for hardship.

Families may request the use of regulatory deductions and exclusions if adjusted income would be lower than adjusted income calculated using BRHP standard deductions. The request must be made within 14 calendar days of the notification of the change in family rent share.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

Portfolio of units has more than doubled since the activity was implemented. As such the cost appears higher; however, the savings continue to be realized.

Metrics

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Asset Income: $23,795 Adjusted Income: $23,796 FT Student and Adoption Assistance Exclusion: $534	Asset Income: $0 Adjusted Income: $28,406 FT Student and Adoption Assistance Exclusion: $0	Asset Income: $0 Adjusted Income $39,094 5,485 actions processed @ .25 hours each = 1,371 hours @ $28.51/hour FT Student and Adoption Assistance Exclusion: $0	Yes No Yes
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Asset Income: 935 hours Adjusted Income: 935 hours FT Student and Adoption Assistance Exclusion: 21 hours	Asset Income: 0 hours Adjusted Income: 1,125 hours FT Student and Adoption Assistance Exclusion: 0 hours	Asset Income: 0 hours Adjusted Income: 1,371 hours FT Student and Adoption Assistance Exclusion: 0 hours	Yes No Yes
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).	Asset Income: <1%	Asset Income: 0%	Asset Income: 0%	Yes

	Adjusted Income: 8% FT Student and Adoption Assistance Exclusion: <1%	Adjusted Income: 0% FT Student and Adoption Assistance Exclusion: <1%	Adjusted Income: 0% FT Student and Adoption Assistance Exclusion: 0 %	
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total household contributions towards housing assistance (increase).	$470	$470	$461	No
** Baseline and Benchmark first established in FY 2019. HABC uses average TTP for this metric*.				

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.

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

Impact

Two PBV contracts have designated to include LTA units. The first contract is O'Donnell Heights which includes the 23 units which were under HAP prior to FY 2021. In FY 2021, HABC leased 40 additional LTA units at 1234 McElderry, bringing the total PBV LTA units to 63.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

The benchmark for this activity was met in FY 2021.

Metrics

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 households	23	63	Yes

Activity #2019-01: Rent Simplification

Plan Year Approved, Implemented, Amended

Approved FY 2019; Implemented FY 2020, 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.

- *Payment Standard Changes* – HABC applies the payment standard in effect on the effective date of the regular recertification regardless of fluctuations in payment standards from year to year.

Impact

In FY 2021, HABC adopted the policy regarding adopting the existing payment standard in effect at recertification regardless of fluctuations from year to year. As the payment standards increased in FY 2021, this policy did not result in harm to any HCV households.

Where the asset income and full-time student exclusion are concerned, in FY 2021, 575 families had assets under $50,000, 7 families had assets valued at $50,000 or more and 45 families received the full-time student income exclusion. Both HABC and participants continued to derive benefits from the MTW asset income policy.

Hardship Policy

HABC reviews hardships related to decreases in payment standard 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%. The payment standards increased in FY 2021 and as such, there were no hardship requests.

Actual Non-Significant Changes

In FY 2021, HABC received approval and adopted a policy whereby the payment standard in effect on the effective date of the regular recertification regardless of fluctuations in payment standards from year to year was applied.

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021.

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were met in FY 2021

Metrics

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Number of Adult FT Students with Earned Income & Households with Assets: 1,563 Time per FT Student and Household with Assets - Verification & Calculation: .5 hours Average Hourly Staff Rate: $30.77 Total Cost of Activity Prior to Implementation: $24,047	Number of Adult FT Students with Earned Income & Households with Assets: 1,563 Time per FT Student and Households with Assets - Verification & Calculation: 0 hours Average Hourly Staff Rate: $30.77 Anticipated Total Cost of Activity: $0 Savings: $24,047	Number of Adult FT Students with Earned Income & Households with Assets under $50,000 620 Time per FT Student with earned income and Households with Assets - Verification & Calculation: 0 hours Average Hourly Staff Rate: $30.77 Total Cost of Activity: $0 Savings: $24,047	Yes The savings reflect the number of households with assets and FT Students
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Number of Adult FT Students with Earned Income & Households with Assets: 1,563 Time per FT Student and Household with Assets - Verification & Calculation: .5 hours Total Time Spent on Activity Prior to Implementation 781.5	Number of Adult FT Students with Earned Income & Households with Assets: 1,563 Time per FT Student and Households with Assets - Verification & Calculation: 0 hours Anticipated Total Time Spent on Activity:	Number of Adult FT Students with Earned Income & Households with Assets: 620 Time per FT Student and Households with Assets - Verification & Calculation: 0 hours	Yes

		0 hours Savings: 781.5 hours	Anticipated Total Time Spent on Activity: 0 hours Savings: 781.5 hours	
CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease)	5%	2%	11%	No

Activity #2019-02: Local Fair Market Rent

Plan Year Approved, Implemented, Amended

Approved FY 2019; implemented FY 2020

Description/Update

This activity was implemented for both HABC's Leased Housing Program and the Baltimore Housing Mobility Program operated by the BRHP. BRHP administers the vouchers for the Thompson Remedial and Partial Consent Decree vouchers. MTW flexibility continues to be utilized to support Thompson activities and 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 promotes expansion of housing choice for voucher holders and minimizes any negative impacts to existing voucher holders and property owners. Annually, HABC and BRHP 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.

Impact

HABC used this MTW flexibility to identify and assist participants in leasing units in opportunity areas and to promote expansion of housing choice. In FY 2021, 484 BRHP and 174 HCV families moved to opportunity areas, including new admissions and moves. By the end of FY 2021, the local FMR had been applied to all households which provides households with greater opportunities to access neighborhoods throughout the region. In fact, BRHP households are in 462 of the 667 tracts which represents 70% of all of the tracts in the region. With this flexibility, BRHP removes barriers to housing choice and provides families with more opportunities to lease units in areas of opportunity.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021.

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were achieved.

Metrics

*HC #7: Households Assisted by Services that Increase Housing Choice**				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase housing choice (increase).	478	120	484	Yes
***Represents Thompson units only. Leased Housing families are not part of Mobility program services, but are able to access the 50% percentile FMR.*				
*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).	664	166	484	Yes
***Represents Thompson units only. Leased Housing families are not part of Mobility program services, but are able to access the 50% percentile FMR.*				

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

Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2021.

Description of MTW Activity

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

1. If an owner notifies HABC that a deficiency cited in a 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, HABC will require the owner to pay a reinspection fee prior to conducting a second re-inspection. An example of this provisions is as follows:
    - A unit fails its regular inspection on March 5: No inspection fee.
    - A re-inspection 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 re-inspection, 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.

Impact

HABC implemented the MTW inspection fee policy mid-way through FY 2021. Owners were notified via letters and information on HABC's website including HABC's goals and objectives for applying inspection related fees. Seven hundred and eighty-five (785) invoices totaling $58,875 in fees were generated in FY 2021. Where the policy was implemented mid-year, even assuming that the number of initial inspection fails doubled, the number of failed initial inspections was reduced by 40%.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

The baseline and benchmark for CE #1 and CE #2 were updated to reflect the number of initial failed inspections and second regular reinspection fails. This is consistent with the baseline metric.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were met.

Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease)	$197,276 Total cost first initial inspection fails and second regular reinspection fails: Number of first initial inspection fails +	$110,024 Total cost first initial inspection fails and second regular reinspection fails: Number of first initial inspection fails + second	$110,024 Total cost first initial inspection fails and second regular reinspection fails: Number of first initial inspection fails +	Yes

	second regular reinspection fails: 6,069 Time per inspection: 1.65 Hours 6,069 * 1.65 10,014 hours 10,014 hours x $19.70 = $197,276	regular reinspection fails: 1,643 + 1,742 = 3,385 Time per inspection: 1.65 Hours 3,385 x 1.65 = 5,585 hours 5,585 hours x $19.70/hour =$110,024	second regular reinspection fails: 1,643 + 1,742 = 3,385 Time per inspection: 1.65 Hours 3,385 x 1.65 = 5,585 hours 5,585 hours x $19.70/hour = $110,024	
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 regular reinspection fails: : 6,069 Total first inspection time: 6,069 * 1.65 hours per inspection= 10,014 hours	Number of first initial inspection fails + second regular reinspection fails: 1,643 + 1,742 = 3,385 Time per inspection: 1.65 Hours 3,385 x 1.65 = 5,585 hours	Number of first initial inspection fails + second regular reinspection fails: 1,643 + 1,742 = 3,385 Time per inspection: 1.65 Hours 3,385 x 1.65 = 5,585 hours	Yes
**HABC anticipates that implementation of a reinspection fee may result in a reduction in the number of reinspections.*				
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%	N/A	N/A
**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.*				

Activity #2020-03: Local Forms

Plan Year Approved, Implemented, Amended

Approved FY 2020; implemented FY 2021

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.

Impact

To date, HABC has prepared local versions of the FSS Contract of Participation, Individual Training and Services Plan and a RAD PBV lease each of which reflect HABC's applicable MTW policies. HABC also reviewed potential changes to the Privacy Act HUD Form 9886 in an effort to update the form to reflect their recertification frequency.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

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 used an average of .25 hours and multiplied that time by the number of assisted households.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

HABC is required to report on these metrics; however, outcomes for time savings related to a new form are difficult to track and do not accurately reflect the administrative efficiencies gained. The outcome in FY 2021 was less than the benchmark only as a result of lower utilization and not as a result of the benefits gained in using the local version of the form.

Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease)	$224,836 7,307 hours .5 hours per form x 14,613 HCV families Hourly rate: $30.77	$112,402 3,653 hours .25 hours per from x 14,613 HCV families Hourly rate: $30.77	$100,187 3,256 hours .25 hours per from 13,022 HCV families Hourly rate: $30.77	No
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease)	7,307 hours .5 hours per form x 14,613 HCV families	3,653 hours .25 hours per from x 14,613 HCV families	3,256 hours .25 hours per from 13,022 HCV families	No

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

Plan Year Approved, Implemented, Amended

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

Description/Update

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

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

HABC utilizes 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; where dictated by market conditions. Where HABC wishes to increase payment standards above 135% of the FMR, HABC will amend the activity for HUD approval prior to implementing a payment standard if higher than 135%.

As part of this activity, to ensure the accuracy of the reasonable rent determination process, HABC conducts reasonable rent (RR) determinations on a random sample of the units where rent increases were requested. HABC conducts the RR determinations using the regulatory reasonable rent methodology; however, HABC uses the SEMAP sample size requirements to dictate the number of RR determinations to be completed. HABC uses 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 quality control 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

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.

Impact

In July of 2021, HABC began placing a 2.0% cap on annual contract rent increases for units where the tenant is already receiving HCV rental assistance. Additionally, HABC began using the rent ranges provided in the market study to determine reasonable rent for rent increases on existing units. To ensure that the use of rent ranges was yielding reasonable rents, HABC conducted quality control reviews using its reasonable rent software and compared the outcomes to the rent range determined rents. HABC will continue to use the parallel reasonable rent systems to test the rent determinations to ensure that rents are consistent with market conditions. In determining rents in FY 2021, HABC did not approve rents above 120% of the FMR; however, HABC will continue to review market conditions and may approve rents above 120% of the FMR as market conditions dictate.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021.

Actual Changes to Metrics/Data Collection

No actual changes were made to metrics in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021.

Challenges in Achieving Benchmarks and Possible Strategies

All benchmarks were met in FY 2021.

Metrics

CE #1: Agency Cost Savings				
Unit of	**Baseline***	**Benchmark***	**Outcome**	**Benchmark**

Measurement				Achieved?
Total cost of task in dollars (decrease)	Total Cost: $57,678 Time to determine rent reasonableness: .5 Number of rent requests, new admissions and moves: 3,749* Staff hourly rate: $30.77	Total Cost: $28,839 Time to determine rent reasonableness: .25 Number of rent requests, new admissions and moves: 3,749* Staff hourly rate: $30.77	Total Cost: $37,816 Time to determine rent reasonableness: .25 Number of rent requests, new admissions and moves: 4,916* Staff hourly rate: $30.77	Yes The cost is greater; however, there were more requests than forecasted. Savings continue to be realized.
**FY 2018 data was used to establish the baseline and benchmark.*				
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline***	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease)	Total Time: 1,875 hours Time to determine rent reasonableness: .5 Number of rent requests, new admissions and moves: 3,749* .5	Total Time: 937 hours Time to determine rent reasonableness: .25 Number of rent requests, new admissions and moves: 3,749* .25	Total Time: 1,229 hours Time to determine rent reasonableness: .25 Number of rent requests, new admissions and moves: 4,916*.25	Yes The time outlay is greater; however, there were more requests than forecasted. Time savings continue to be realized
**FY 2018 data was used to establish the baseline and benchmark.*				
CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease)	<5%	<3%	<1%	Yes

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

Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2020.

Description/Update

The Bailey Consent Decree as amended by the Bailey Supplemental Consent Decree in 2015, requires that HABC produce 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.

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 $180,000 which was approved by HUD in April 2018.

In searching for units to satisfy the Bailey 10 requirement, HABC has discovered that the acquisition and rehabilitation costs will likely exceed the proposed costs set forth in the initial budget and, in some cases, will likely exceed the HUD TDC. The neighborhoods in which the Bailey 10 may be located are comparable to the type of neighborhoods in which the Hollander units were acquired. Therefore, the costs for the acquisition and renovation of the Hollander Ridge nineteen one-bedroom units are reasonable predictors of the costs expected for the Baily 10. Accordingly, HABC determined that purchase prices would range anywhere from $150,000 to $215,000, with an average price of $172,079, renovation costs would range from $9,842 to $61,330 with an average cost of $33,784 and 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 $247,036 per unit.

The 2019 HUD TDC for a one-bedroom row house unit in Baltimore is $186,292. HABC proposed a per unit TDC of $247,036 in order to produce the Bailey 10, which represents a 33% increase over HUD's current TDC limits.

Impact

Through 2021 three of the Bailey units were purchased, however all three of the units were under construction in FY 2021 and will not be completed until FY 2022. In response to current market conditions, HABC received approval in its FY 2022 Plan, to pay over the appraised amount for a property by up to 10% in order to compete with buyers who are able to meet seller's contractual term requirements at lower amounts as well as approval to increase the TDC for the Bailey units up to 50% over HUD's current approved TDC limit of $247,036. It is anticipated that this flexibility will provide HABC with greater opportunities to purchase units under this activity.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

HABC's ability to compete and secure properties under this activity was impacted due to the demand for properties and HABC's constraints on TDCs and purchase prices. HABC received approval in FY 2022 to increase TDC and purchase price which will have a positive impact on HABC's ability to secure properties for this activity.

Metrics

HC #1: Additional Units of Housing Made Available				
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).	0	10	0	No
HC #2: Units of Housing Preserved				
Unit of Measurement	***Baseline***	***Benchmark***	***Outcome***	***Benchmark Achieved?***

Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	10	0	No
HC #3: Decrease in Wait List Time*				
Unit of Measurement	***Baseline***	***Benchmark***	***Outcome***	***Benchmark Achieved?***
Average applicant time on wait list in months (decrease).	N/A	N/A	N/A	N/A
**This metric is not applicable to this activity. This activity does not create a preference for NEDs on the wait list. As eligible families rise to the top of the list, they will be housed in one of the units.*				
HC #4: Displacement Prevention				
Unit of Measurement	***Baseline***	***Benchmark***	***Outcome***	***Benchmark Achieved?***
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	0	10	0	No
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	10	0	No

Activity #2021-01: Emergency Waivers

Plan Year Approved, Implemented, Amended

Approved FY 2021 and implemented FY 2021.

Description/Update

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 utilizes its MTW authority on its emergency waivers activity which addresses the burdens placed on all stakeholders. HABC established 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 waives 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 waives the requirements of the verification hierarchy but continues to use EIV to confirm income at interim and regular recertification.

3. **Increase in Payment Standard:** HABC waives 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 waives 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 waives 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 waives the requirement to conduct HQS quality control inspections and instead suspends HQS quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV program.

7. **Homeownership HQS:** HABC waives 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 waives the requirement to complete annual self-inspections of public housing units. HABC continues to respond to and address

serious conditions that could jeopardize life or property. When the waiver is lifted, HABC resumes self-inspections beginning with the units which were inspected on the oldest date. This waiver applies to the public housing program.

9. **FSS Contract of Participation:** HABC waives 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.

Impact

HABC utilized the Emergency Waivers during the entire fiscal year and implanted steps to address completion of delayed reexaminations and inspections. Emergency status ended at the end of the FY 2021.

Hardship Policy

Not applicable. This activity has no adverse impact on participants.

Actual Non-Significant Changes

No non-significant changes were made in FY 2021

Actual Changes to Metrics/Data Collection

No changes to metrics or data collection methods were made in FY 2021.

Actual Significant Changes

No significant changes were made in FY 2021

Challenges in Achieving Benchmarks and Possible Strategies

HABC does not feel that this metric is an accurate reflection the outcomes for this activity. The metrics were revised in the FY 2022 plan and instead reflect the number of families who were protected from displacement during declared emergencies as a result of this waiver.

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	$158,742 6,935 hours x $22.89/hour	Yes

**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 hours 5,056 recerts x 1.5 hours	6,935 hours 4,623 recerts x 1.5 hours	Yes

**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.*

B. Not Yet Implemented Activities

Activity #2020-02: The Healthy Opportunities Program

Plan Year Approved: FY 2020, Implementation Planned FY 2022

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 was delayed due to COVID-19. Implementation is planned for FY 2022.

Implementation Schedule

In FY 2021, HABC continued to work with its partners in planning, developing and implementing this important program. HABC received a planning grant from the Kresge Foundation to assist in implementing this program and continued to collaborate with applicable partners to identify

potential HOP participants. It is anticipated that HABC will begin to enroll HOP participants towards the end of FY 2022

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

Plan Year Approved, Implemented, Amended

Approved FY 2021 Planned Implementation FY 2022

Description/Update

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
Education	$300	Completed semester or quarter for completion of full-time post-secondary or career training
Education	$500	Establishment of college savings plan (529)

Track	Incentive*	Goal
Education	$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%
Career	$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
Financial Health	$50	Attendance at Financial Health workshop
Financial Health	$500	Achieving credit score milestone
Financial Health	$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
Homeownership	$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.

Reason for Delay

Planned implementation was delayed due to planning and partner collaborating delays as a result of the COVID-19 pandemic.

Implementation Schedule

In FY 2021, BRHP worked on development of program documents and an Action Plan for the GAIN program. BRHP has secured private funding from a local foundation to launch the program and support some of the escrow payments. Additionally, BRHP is in discussion with Compass Working Capital, a leader in the FSS space to provide technical support and/or training prior to program launch. The goal is to enroll the first participants by the fourth quarter of FY 2022.

C. MTW Activities on Hold

There are no activities on hold.

D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that HABC has completed, discontinued, combined with an existing MTW activity or determined do not require MTW authority to implement.

Table 17: 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 50th Percentile (Activity #2009-03)	FY 2009	FY 2011	HUD had adjusted the area Fair Market Rent (FMR) to the 50th 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 50th percentile FMR was being phased out. At the time the activity was closed, use of the 50th 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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			on hold in FY 2014. This activity was identical to the Gilmor Homes Demonstration Program and was implemented at the remaining HABC sites. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015.
Adjusted Income for Thompson Participants (Activity #2012-04)	FY 2012	FY 2019	Pursuant to HABC's MTW authority, for participants in the Baltimore Housing Mobility Program, gross annual income was reduced using standard deductions. This activity was approved and implemented in FY 2012. There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions replace all other regulatory deductions. The deductions are: • $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) 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).
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.

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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Project Based Voucher Amendments to the HAP Contract (Leased Housing) (Activity #2015-04)	FY 2015	FY 2019	Using its MTW authority, HABC waived the three-year contract amendment restriction, which will allow HABC to amend the HAP contract at any time during the initial term of the HAP contract and during any renewal term of the HAP contract. Under this activity, HABC may exercise this option for all PBV units, including, but not limited to the Bailey LTA and PBV units and the non- Bailey LTA PB units. This activity was previously on hold and was approved in FY 2015. HABC closed out this activity and combined it with other previously HUD approved Project Based program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
Security Deposit Assistance (Activity #2017-02)	FY 2017	FY 2019	Under this activity, BRHP will use HAP funds for payment to landlords to cover a security deposit for Baltimore Housing Mobility Program participants leasing in a census tract designated "opportunity" by BRHP. Subject to funding availability, BRHP will offer each participant this Security Deposit Assistance on a one-time basis, and only if that participant has repaid the entire balance of any previously grant-funded Security Deposit Assistance Loan and is otherwise in good standing with BRHP. The Security Deposit Assistance will not exceed the equivalent of one-month's rent and BRHP will require a participant contribution towards the security deposit of between $200 and $500 dollars, which will be adjusted seasonally to encourage leasing in summer months. This activity was approved and implemented in FY 2017. HABC closed out this activity and combined it with other previously HUD approved Mobility Program Enhancement activities. HABC also modified this activity in FY 2019 under the previously approved Mobility Enhancement activity.
Section 811 Supportive Housing (Activity 2009-02)	Never Implemented	2019	HABC proposed combining MTW funds with 811 funds to create units for non-elderly persons with disabilities pursuant to the Bailey Consent Decree. HABC intended to make these funds available through a competitive process under which developers would be required to demonstrate through specified documentation that the project had a gap that could not otherwise be addressed. HABC was not able to implement this activity due to a lack of interest from developers. As such, there are no final outcomes. Gauging

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			developer interest and including developers in the planning stages of such an activity may have yielded better outcomes.
Direct Homeownership Program (Activity 2012-02)	2012	2019	The direct purchase second mortgage program was intended for applicants with incomes of no less than $18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds would also be available. *The activity was closed out due to lack of participation.* The direct purchase second mortgage program was targeted to applicants with incomes of no less than $18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds was to be made available through this program.
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 2020	HABC has moved to 100% online communication; this activity was originally developed to encourage enrollment in online communications or be charged a fee for paper communications. Almost 100% of owners are enrolled in direct deposit and receiving electronic communications; therefore, this activity is not cost effective and can be closed out.
Project-Based Voucher Amendments to the HAP Contract (Activity 2019-03)	2019	2019	HABC did not close this activity out; rather, it was combined with Activity 2006-02: Enhanced Project Based Voucher Program. The amendment allows PB referrals from the Mayor's Office of Human Services for homeless and veterans and other targeted populations and requires the owner to maintain the designated unit for the term of the PBV contract.

V. Application of MTW Funds

A. Financial Reporting

i. Available MTW Funds in the Plan Year

HABC will submit all required FY 2021 unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA), or its successor system within the required time frame.

ii. Expenditures of MTW Funds in the Plan Year

HABC will submit all required FY 2021 unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA), or its successor system within the required time frame.

Actual Sources of MTW Funding for FY 2021

FDS Line Item Number	FDS Line Item Name	Actual 2021 Expenditure
70500 (70300+70400)	Total Tenant Revenue	$18,618,189
70600	HUD PHA Operating Grants	$307,436,339
70610	Capital Grants	$17,557,015
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$0
71100+72000	Interest Income	$379,383
71600	Gain or Loss on Sale of Capital Assets	$-3,846,576
71200+71300+71310+71400+71500	Other Income	$7,579,656
70000	**Total Revenue**	**$347,724,006**

Actual Uses of MTW Funding for FY 2021

FDS Line Item Number	FDS Line Item Name	Actual Amount for 2021
91000 (91100+91200+91400+91500+91600+91700+ 91800+91900)	Total Operating – Administrative	$32,187,532

FDS Line Item Number	FDS Line Item Name	Actual Amount for 2021
91300+91310+92000	Management Fee Expense	$12,390
91810	Allocated Overhead	$(274,600)
92500 (92100+92200+92300+92400)	Total Tenant Services	$1,959,470
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$17,157,304
93500+93700	Labor	
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$41,753,899
95000 (95100+95200+95300+95500)	Total Protective Services	$623,221
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$3,235,328
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$5,996,124
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	$1,693,575
97100+97200	Total Extraordinary Maintenance	$1,750,097
97300+97350	Housing Assistance Payments + HAP Portability-In	215,848,153
97400	Depreciation Expense	$19,068,632
97500+97600+97700+97800	All Other Expenses	
90000	**Total Expenses**	**$341,011,125**

iii. Describe Application of MTW Funding 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.

In FY 2021 HABC used the single fund flexibility for the following:

- Due to inadequate funding for capital activities, HABC utilized prior year's HCV HAP Fund to supplement capital improvements at Cherry Hill for HVAC work.
- HABC used these same MTW Funds for renovation and rehabilitation of vacant units

B. Local Asset Management Plan (LAMP)

i.	***Did the MTW PHA allocate costs within statute in the Plan Year?***	No
ii.	***Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?***	Yes
iii.	***Did the MTW PHA provide a LAMP in the appendix?***	Yes

iv. ***If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.***

No changes were made in FY 2021

VI. Administrative

A. Reviews, Audits and Inspections

HABC did not have any HUD reviews, audits or physical inspection issues that required the agency to take action during FY 2021.

B. Evaluation Results

Not applicable. HABC utilizes internal resources to measure and evaluate MTW activities.

C. MTW Statutory Requirement Certification

HABC certifies that, in Fiscal Year 2021, it continued to meet the three statutory objectives of the MTW program. The certification required by HUD is included in Appendix A.

D. MTW Energy Performance Contract (EPC) Flexibility Data

See Appendix E

VII. Exhibits

Appendix A: Certification of MTW Statutory Requirements

Appendix B: HABC Owned and HABC Non-Owned Housing

Appendix C: Waiting List Demographics

Appendix D: LAMP

Appendix E: Energy Performance Contracting Data

Appendix A: Certification of MTW Statutory Requirements

Robin Carter
Chair | Board of Commissioners
Janet Abrahams
President | Chief Executive Officer

HOUSING AUTHORITY of BALTIMORE CITY

Appendix A: Certification of MTW Statutory Requirements
FY 2021 Annual Report

I, Janet Abrahams, Chief Executive Officer, hereby provide this certification on behalf of the Housing Authority of Baltimore City (HABC) in submitting the FY 2021 MTW Annual Report. 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.

Janet Abrahams
Chief Executive Officer

3/16/2022
Date

Housing Authority of Baltimore City | 417 East Fayette Street, Baltimore, MD 21202
410.396.3232 www.HABC.org @BmoreHabc

COMMUNITY | CUSTOMER SERVICE | COLLABORATION | COMMUNICATION

Appendix B: HABC Owned and HABC Non-Owned Housing

HABC-Owned ACC Units*

Development	Total Units	Total ACC Units	ACC 0 BR's	ACC 1 BR's	ACC 2 BR's	ACC 3 BR's	ACC 4 BR's	ACC 5 BR's	ACC 6 BR's
Albemarle Square	327	130		11	31	80	8		
Arbor Oaks (Mt. Pleasant)	212	62		26	36				
Monastery Gardens Apartments	37	11		2	5	4			
Montpelier's Choice (PH)*	39	13		1	6	6			
Townes at The Terraces	203	203			78	110	15		
Westhills Square	108	11		2	8	1			
Barclay Townhomes	72	53		39	5	5	2	2	
CHM*	14	14			4	6	3		1
Midtown Apartments*	35	35		7	17	11			
Renaissance at Reservoir Hill	64	40		12	9	13	5		1
Sharp-Leadenhall	31	23		2	7	7	7		
St. Ambrose	30	30		1	1	24	4		
Stricker Street Apartments*	25	25		4	7	2	12		
Uptown Apartments*	37	37		4	25	3	5		
	1234	**687**	**0**	**111**	**239**	**272**	**61**	**2**	**2**

HABC Owned Non-ACC Units

Non-ACC Developments	Total Units	ACC 0 BR's	ACC 1 BR's	ACC 2 BR's	ACC 3 BR's	ACC 4 BR's	ACC 5 BR's	ACC 6 BR's
Barister Court	**32**	5	21	6				
Indecco Apts	**45**	12	33					
Invington Place	**41**	6	35					
Maxwell III	**20**			4	13	2	1	
Montpelier's Choice	**26**		8	9	9			
Norman Lohn House	**12**		3	9				
Somerset Chase	**22**			2	20			
West Lexington	**44**			3	41			
	242	**23**	**100**	**33**	**83**	**2**	**1**	**0**

RAD/Long-Term Affordable Units Non-HABC Owned

LTA-RAD Development	Total Units	0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's	Settlement Date
The Allendale	**164**		164						11/6/2015
Bel-Park Tower	**253**	134	119						11/20/2015
Bernard E. Mason	**223**		223						11/13/2015
The Brentwood	**150**	86	64						12/18/2015
Lakeview Towers	**302**	195	107						11/20/2015
Hollins House	**130**		130						11/30/2015
Wyman House	**168**	112	56						12/11/2015
Primrose Place	**125**		125						2/5/2016
Pleasant View Family	**201**		11	130	50	10			7/28/2016
Pleasant View Senior	**110**		110						9/9/2016
McCulloh High Rise	**347**	132	199	16					11/18/2016
Govans Apartments	**191**	102	89						11/30/2016
Chase House	**189**	109	80						12/29/2016
Ellerslie Apartments	**117**	70	47						2/3/2017
Broadway Overlook	**84**		22	12	39	11			8/11/2017
Hillside Park	**30**		1	29					11/30/2017
Terrace Garden Cooperative	**47**		46	1					12/18/2017
Monument East	**170**	51	119						8/31/2018
Heritage Crossing	**75**		6	22	39	8			11/30/2018
J Van Story Branch	**350**	206	144						11/29/2018
Homes of Arundel (Thompson 58)	**58**	2	1	7	40	8			5/31/2019
Rosemont Tower	**203**		203						11/22/2019
Somerset Extension	**64***		13	17	23	11			12/24/2019
Hollander Ridge	**94**		18	33	36	7			12/29/2021
	3845	**1199**	**2097**	**267**	**227**	**55**	**0**	**0**	

*54 units are RAD and 7 are LTA Ned units

Long-Term Affordable Units for Bailey Consent Decree (Non-HABC Owned)

LTA-Bailey Development	Total Units	0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's
Barclay	**33**		22	5	6			
Bon Secours Gibbons	**8**			4	4			
Chapel Green	**10**		8		2			
Fells Point Station	**8**			3	5			
Lillian Jones	**8**			2	6			
Moravia Park	**9**		9					
Orchard Ridge	**93**		69	14	7	2	1	
Penn Square	**16**		12		4			

Long-Term Affordable Units for Bailey Consent Decree (Non-HABC Owned)

LTA-Bailey Development	Total Units	0 BR's	1 BR's	2 BR's	3 BR's	4 BR's	5 BR's	6 BR's
Poppleton	**14**		7	1	6			
North Avenue Gateway	**5**			5				
Reservoir Hill	**15**		11	3	1			
Sharp Leadenhall	**5**		5					
Uplands	**6**			4	2			
Key's Pointe Bailey Units 1A	**16**		12	1	2	1		
Key's Pointe Bailey Units 1B	**15**		11	1	2	1		
*Key's Pointe (Non-Bailey Units)	**23**		2	10	11			
Chai Fallstaff	**1**				1			
City Arts II	**3**			3				
Mulberry at Park	**8**			2	6			
Greenmount and Chase	**4**		2	2				
Walbrook Mill	**1**				1			
22 Light Street Apartments	**2**				2			
1234 McElderry	**8**		1	3	4			
TOTAL	**311**	**0**	**171**	**63**	**72**	**4**	**1**	**0**

*Non-Bailey Units

Appendix C: Waiting List Demographics

Bedroom	LIPH		S8		BOTH		Total	Percent
	Total	Percent	Total	Percent	Total	Percent		
0	3	0%	12,192	63%	1	0%	**12,195**	**43%**
1	7,414	84%	2,513	13%	615	68%	**9,927**	**35%**
2	153	2%	3,306	17%	19	2%	**3,459**	**12%**
3	907	10%	1,211	6%	202	22%	**2,118**	**8%**
4	307	3%	67	0%	71	8%	**374**	**1%**
5	28	0%	8	0%	3	0%	**36**	**0%**
6	8	0%	0	0%	0	0%	**8**	**0%**
Total	**8,820**	**100%**	**19,297**	**100%**	**911**	**100%**	**28,117**	**100%**

RACE	LIPH		S8		BOTH		Total	Percent
	Total	Percent	Total	Percent	Total	Percent		
American Indian/Alaska Native	24	0%	106	1%	1	0%	**130**	**0%**
Asian	24	0%	49	0%	2	0%	**73**	**0%**
Black/African American	8,174	93%	17,434	92%	859	94%	**25,608**	**92%**
Native Hawaiian/Other Pacific Islander	53	1%	53	0%	3	0%	**106**	**0%**
Other	91	1%	241	1%	2	0%	**332**	**1%**
White	442	5%	1,051	6%	43	5%	**1,493**	**5%**
Total	**8,808**	**100%**	**18,934**	**100%**	**910**	**100%**	**27,742**	**100%**

HH Type	LIPH		S8		BOTH		Total	Percent
	Total	Percent	Total	Percent	Total	Percent		
Elderly	570	6%	1,799	10%	85	9%	**2,369**	**9%**
Non-Elderly Disabled	3,692	42%	3,325	18%	346	38%	**7,017**	**25%**
Other	4,546	52%	13,810	73%	479	53%	**18,356**	**66%**
Total	**8,808**	**100%**	**18,934**	**100%**	**910**	**100%**	**27,742**	**100%**

Ethnicity	LIPH		S8		BOTH		Total	Percent
	Total	Percent	Total	Percent	Total	Percent		
Hispanic or Latino	107	1%	327	2%	11	1%	**434**	**2%**
Not Hispanic or Latino	8,618	98%	18,427	97%	899	99%	**27,045**	**97%**
Other	83	1%	180	1%	0	0%	**263**	**1%**
Total	**8,808**	**100%**	**18,934**	**100%**	**910**	**100%**	**27,742**	**100%**

Income	LIPH		S8		BOTH		Total	Percent
	Total	Percent	Total	Percent	Total	Percent		
Below 30%	8,338	95%	17,861	94%	857	94%	**26,199**	**94%**
30% to 50%	406	5%	870	5%	46	5%	**1,276**	**5%**
50% to 80%	59	1%	177	1%	6	1%	**236**	**1%**
Over 80%	5	0%	26	0%	1	0%	**31**	**0%**
Total	**8,808**	**100%**	**18,934**	**100%**	**910**	**100%**	**27,742**	**100%**

Appendix D: LAMP

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 12 years 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 CY 2021 will be 14.52% for MTW and 7.81% for non-MTW (see Attachment A for detail).**

.

MTW PLAN - ATTACHMENT A

HABC Proposed Cost Allocation Methodology - FY 2021

Calculation of Indirect Cost Rate

Version 1 - Preliminary

Direct	OFR *Treatment*	**FY18**	**FY19**	**FY20**	Change	Share	MTW	Non-MTW	OH Limit	OH shortfall	Comments	Proof	Sites Total	Ind Depts
Sites (LIPH)	Dir	61,786,719	61,992,637	53,232,430	-14%	14%	53,232,430					-		
Sites PVT	Dir	6,789,951	7,506,819	7,625,326	2%	2%	7,625,326					-		
Sites (CFP hard-includes ECI)	Dir	26,553,485	17,794,513	24,543,446	38%	6%	24,543,446					-		
Sites (CFP soft - includes ECI)	Dir	1,170,840	1,221,835	1,609,030	32%	0%	1,609,030					-		
Sites - Spec/Non-routine	Dir	-	1,100,000	-		0%						-		
EPC Costs (Hard)	Dir	4,525,390	4,465,781	2,905,879	-35%	1%		2,905,879				-		
EPC Soft	Frontline	741,519	800,711	683,633	-15%	0%	683,633					-		
Crews	COCC	2,254,288	2,583,968	2,694,587	4%	1%	2,694,587					-		
HCVP HAP	Dir	156,754,032	226,134,903	233,920,312	3%	60%	227,289,873	6,630,439				-		
HCVP Admin	Dir	9,090,845	9,366,619	10,412,164	11%	3%	10,262,643	149,521				-		
BRHP Admin		-	-	5,765,771	#DIV/0!	1%	5,765,771					-		
Development Hard/HOPE VI	Dir	10,846,606	9,102,080	10,195,794	12%	3%		10,195,794				-		
Development Soft	Mixed	-		775,180		0%		775,180				-		
DHCD Hard	Dir	-	1,661,227	-		0%						-		
DHCD Soft	Mixed	-	-	4,082,381		1%		4,082,381				-		
RAB	Dir	182,583	191,118	191,469	0%	0%	191,469	-				-		
Res Serv - LIPH	Frontline	1,688,843	1,667,810	1,619,185	-3%	0%	1,619,185					-		
Res Serv - Grants	Frontline	2,262,063	3,200,613	4,158,797	30%	1%		4,158,797	61,375	517,919		-		
Energy	Frontline			-		0%								
F&A Frontline		-	-	74,872		0%	74,872					-		
FHEO Front Line				123,509		0%	123,509					-		
HABCO Hard	Dir	-	-	-		0%	-					-		
HABCO Soft	Frontline	1,444,772	1,331,327	1,447,559	9%	0%		1,447,559				-		
Hsg. Applic.	Frontline	1,118,073	1,336,314	1,121,082	-16%	0%	1,121,082					-		
Hsg. Ops. (dir)	Frontline	2,792,598	2,858,471	3,157,470	10%	1%	3,157,470					-		
Homnrshp	Frontline	38,745	-	42,830		0%	42,830					-		
Legal, Lease enforcement	Frontline	-	-	-		0%						-		
MPA	Frontline			928,270		0%	928,270							
Relocation	Frontline	99,818	-	-		0%						-		
Work Order Ctr.	Frontline	-	-	-		0%	-					-		
Fund 113	Dir	1,755,603	1,751,755	1,936,821	11%	0%	-	1,936,821	96,841	172,946		-		
Undesignated/Legacy	Frontline	2,425,753	870,400	4,100,000	371%	1%	4,100,000					-		
Legal FL	Frontline	127,088	-	-		0%						-		
Less AMP/FL planned cuts	FL/Dir		(1,782,452)	-								-		
												-		
Subtotal Direct		**294,449,614**	**355,156,450**	**377,347,797**	**6%**	97%	**345,065,426**	**32,282,371**	**158,216**			-		
												-		

							91%	9%			Total Program Cost
					Change		MTW Direct	Non-MTW Dir	MTW Indir	Non-MTW Ind	(Direct + Indirect)
Low Rent		75,204,459	71,825,085	73,784,379	3%		74,911,030	-	10,952,546	-	85,863,576
CFP/RHF		1,170,840	1,221,835	1,609,030	32%		1,609,030	-	224,128	-	1,833,158
HCVP		9,090,845	9,366,619	10,412,164	11%		10,262,643	149,521	1,429,520	20,827	11,862,512
FL Fiscal/Legal				1,126,651							
Devel		-	-	775,180			-	775,180	-	107,978	883,158
HABCO		1,444,772	1,331,327	1,447,559	9%			1,447,559		201,636	1,649,195
DHCD		-	-						-	-	-
Grants		2,262,063	3,200,613	4,158,797	30%			4,158,797	-	61,375	4,220,172
EPC		741,519	800,711	683,633	-15%		683,633	-	99,274	-	782,907
Biz Activities		1,755,603	1,751,755	1,936,821	11%			1,936,821	-	269,787	2,206,608
		91,670,101	**89,497,946**	**95,934,214**	7%		**87,466,336**	**8,467,878**	**12,705,468**	**661,602**	**109,301,284**
Indirect							-	-			
Admin Services	COCC	370,588	314,351	338,212	8%	0%					
Audits	COCC	142,710	-			0%		-			
Budgets	COCC	368,410	532,145	596,458	12%	0%					
CAO	COCC		306,343	331,460	8%	0%					
CFO	COCC	1,506,390	529,102	430,264	-19%	0%					
Agency Wide	COCC					0%					
Communications	COCC	546,632	755,059	754,924	0%	0%					
COO	COCC	585,782	608,307	493,856	-19%	0%					
Executive Director	COCC	846,709	1,006,655	799,331	-21%	0%					
Facilities/Bldg. Support	COCC	1,184,308	1,058,794	1,073,906	1%	0%					
FHEO	COCC	725,255	687,237	479,060	-30%	0%					
Finance & Accounting	COCC	1,592,724	1,697,596	1,774,998	5%	0%					
HousingStat	COCC	-	-			0%					
Human Resources	COCC	1,285,841	1,514,947	1,512,333	0%	0%					
IT	COCC	1,909,070	2,075,803	1,893,658	-9%	0%					
Inspector General	COCC	530,536	504,100	538,682	7%	0%					
Legal - attorneys	COCC	1,305,443	1,606,747	1,503,685	-6%	0%					
MPA	Frontline		707,555			0%					
P&D	COCC	662,808	1,045,433			0%					
Procurement	COCC	569,288	582,450	766,978	32%	0%					
Legacy costs	COCC			75,217		0%					
5% Salary Addback	COCC										
Anticipated cuts COCC	COCC		(292,250)								
Subtotal Indirect		**14,132,494**	**15,240,374**	**13,363,022**	-12%	3%	**12,183,501**	**1,179,521**	**13,363,022**		
Indirect Rate		**15.4%**	**17.03%**	**13.93%**							
Program totals (Dir + Ind)		**105,802,595**	**104,738,320**	**109,297,236**	4%						
							91%	9%			
Indirect Cost Rate (I/D) - blended						**13.93%**	**13.93%**	**13.93%**			
TOTAL		**308,582,108**	**370,396,824**	**390,710,819**	5%	100%	**357,248,927**	**33,461,892**			
							91%	9%			
Reallocation of non-allocable overhead							517,919	(517,919)			
[illegible]		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			

						91%	9%
Reallocation of non-allocable overhead						517,919	(517,919)
Total Indirect Charges	**14,132,494**	**15,240,374**	**13,363,022**	**-12%**	**3.42%**	**12,701,420**	**661,602**
Total Program Indirect Rate						**14.52%**	**7.81%**
Tot Exp. per Sources and Uses File	311,558,770	372,712,010	390,710,819				
Overall Proof	308,582,108	370,396,824	390,710,819				
Anticipated cuts		(2,074,702)	-				
Variance	2,976,662	240,484	-				
Final Variance	2,976,662			0.00%			

Appendix E: Energy Performance Contracting Data

PERIOD ENDING July 1, 2019-June 30, 2020

The FY 2021 numbers are gathered and analyzed after the submission date of this report. Accordingly, FY 2020 data will be reported in the FY 2021 report.

	Brooklyn AMP 21 485	Latrobe AMP 001 672	Westport AMP 022 200	Cherry Hill AMP 011 1281	Gilmor AMP 006 545	Subtotal 3183	Notes
Is the project ESCo or Self - developed?	Self-Developed	Self-Developed	Self-Developed	Self-Developed	Self-Developed		
What are the number of rehabilitated units in the energy project?	485	672	200	1281	545 (savings adjusted for 91.8% occupancy due to start of the demolition project for 132 units)	3183	
What are the number of rehabilitated AMPS in the energy project?	1	1	1	1	1	5	
What is Total Investment ? ($MM)	$4.68	$26.0	$2.57	$34.6	$6.6	$74.75	
What is Total financed? ($MM)	$2.08	$20.5	$1.37	$24.1	$2.96	$51.15	
What is Debt Service? (Annual)	$214,693	$1,482,224	$66,379	$1,902,902	$304,002	$3,970,200	
What are Projected savings? (Source: Independent Utility Analyst Consultant & IGEA)	$474,116	$1,110,478	$178,550	$1,766,029	$439,917	$3,969,090	
What are Projected savings? (Source: Independent Utility Analyst	$474,116	$1,110,478	$178,550	$1,766,029	$439,917	$3,969,090	

	Brooklyn AMP 21 485	Latrobe AMP 001 672	Westport AMP 022 200	Cherry Hill AMP 011 1281	Gilmor AMP 006 545	Subtotal 3183	Notes
Consultant & IGEA)							
What are Actual Savings? (Source: 3rd party Annual Measurement and Verification report- **FYE 19)**	$397,759	$1,083,258	$182,660	$1,729,497	$262,503	$3,655,677	
What is the Investment per unit? ($MM)	$9,649	$38,690	$12,850	$27,010	$12,110	$23,484	Average
What is the Finance per unit?	$4,289	$30,506	$6,850	$18,813	$5,431	$16,070	Average
What is the Savings per unit?	$820	$1,612	$913	$1,351	$482	$1,149	
What is the Savings per project (AMP)?	$397,759	$1,083,258	$182,660	$1,729,497	$262,503	$3,655,677	
What is the Term of the contract?	20 years	20 years	20 years	20 years	20 years		
What date was the Request for Proposal issued?	12/22/2003	12/22/2003	12/22/2003	12/22/2003	12/22/2003		
What was Date audit executed?	5/12/2006	5/12/2006	5/12/2006	5/12/2006	5/12/2006		
What was Date Energy Services agreement executed?	N/A	N/A	N/A	N/A	N/A		HABC is acting as the ESCO. Thus there is no ESA.

	Brooklyn AMP 21 485	Latrobe AMP 001 672	Westport AMP 022 200	Cherry Hill AMP 011 1281	Gilmor AMP 006 545	Subtotal 3183	Notes
What was Date Repayment starts?	4/15/2010	4/15/2010	4/15/2010	4/15/2010	4/15/2010		
What Types of Energy Conservation Measures were installed at each AMP site?	Energy efficient lighting and appliances; water conservation; new thermostats; tenant metering	Energy efficient lighting; water conservation; decentralized & updated heating system; new radiator controls; new electrical distribution system; tenant metering	Energy efficient lighting water conservation; new thermostats; tenant metering	Energy efficient lighting; water conservation; new heating system distribution piping; new radiators &controls; tenant metering	Energy efficient lighting; water conservation; new thermostats; new boiler burners; new heating distribution control valves; new energy management control system; tenant access to metering information		