

FY 2022  
MTW Annual Plan





## **Moving to Work Annual Plan**

**Fiscal Year 2022**

**Submitted To:**

**U.S. Department of Housing & Urban Development**

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**Housing Authority of Baltimore City**  
**Moving to Work Annual Plan – Fiscal Year 2022**

**Table of Contents**

I.	Introduction and Overview .....	1
	A. Background on the MTW Demonstration .....	1
	B. MTW Long-Term Goals and Objectives .....	2
	C. MTW Goals and Objectives for Fiscal Year 2022 .....	3
II.	General Housing Authority Operating Information .....	7
	A. Housing Stock Information .....	7
	B. Leasing Information .....	34
	C. Waiting List Information .....	35
III.	Proposed MTW Activities: .....	38
	Activity #2022-01: Student Housing Initiative .....	38
	Activity #2022-02: Leasing Incentive Program .....	45
IV.	Approved MTW Activities .....	50
	A. Implemented Activities .....	50
	Activity #2006-01: Streamlined Recertification Process .....	50
	Activity #2006-02 Enhanced Project Based Voucher Program .....	53
	Activity #2006-03: Thompson Biennial Recertifications .....	57
	Activity #2006-04: Family Self-Sufficiency Program Enhancements .....	59
	Activity #2007-01: Mobility Program Enhancements/Thompson .....	62
	Activity #2009-01: MTW Homeownership Program .....	64
	Activity #2010-01: Unit Sizes .....	68
	Activity #2010-02: Bailey Long-Term Affordable Project-Based Voucher Contract .....	70
	Activity #2010-03: Thompson Risk Based Inspections .....	72
	Activity #2012-01: Rent Simplification – Thompson .....	74
	Activity #2014-01: HABC Long-Term Affordable Project-Based Voucher Contract .....	77
	Activity #2019-01: Rent Simplification .....	79
	Activity #2019-02: Local Fair Market Rent .....	82
	Activity #2020-01: Housing Quality Standards (HQS) Modifications & Enhancements .....	84
	Activity #2020-02: The Healthy Opportunities Program .....	88

Activity #2020-03: Local Forms .....	90
Activity #2020-04: Modified Rent Reasonableness & Rent Cap Policy.....	92
Activity #2020-05: The Bailey 10 Total Development Cost Limit Policy .....	95
Activity #2021-01: Emergency Waivers .....	99
Activity #2021-03: Growing Assets & Income Program: Thompson Settlement Agreement.....	103
B. Not Yet Implemented Activities .....	107
C. MTW Activities on Hold .....	107
D. Closed-Out MTW Activities .....	108
V. Planned Application of MTW Funds .....	113
A. Estimated Sources and Uses of MTW Funds in FY 2022 .....	113
B. Planned Application of PHA Unspent Operating Fund and HCV Funding.....	117
C. Local Asset Management Plan (LAMP) .....	118
D. Rental Assistance Demonstration (RAD) Participation .....	118
VI. Administrative.....	124
A. Board Resolution and Certification of Compliance.....	124
B. Documentation of Public Process .....	124
C. Planned & Ongoing Evaluations.....	124
D. Lobbying Disclosures.....	124
Appendix A: Asset Management Table.....	125
Appendix B: Student Housing Initiative Hardship Policy .....	142
Appendix C: Estimated Sources and Uses: Non-MTW Funds .....	143
Appendix D: Local Asset Management Plan .....	147
Appendix E: Board Resolution.....	151
Appendix F: Certification of Compliance .....	153
Appendix G: Certification of Consistency with Consolidated Plan .....	155
Appendix H: Public Process Documentation.....	156
Appendix I: Public Hearing: Comments Received on the FY 2022 Annual Plan.....	157
Appendix J: Written Comments on the FY 2022 Annual Plan.....	161
Appendix K: Lobbying Activities (SF-LLL) Form .....	165
Appendix L: Certification of Payment (HUD-50071) Form.....	166
Appendix M: Rental Housing Submarkets and Opportunity Scores .....	167

## I. Introduction and Overview

This Moving to Work (MTW) Annual Plan provides information on the initiatives and strategies to be undertaken by the Housing Authority of Baltimore City (HABC) under the MTW Demonstration Program in Fiscal Year (FY) 2022, i.e. the period from January 1, 2022 through December 31, 2022.

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

It is important to note that HABC receives the majority of its funding from HUD, which generally determines funding on a calendar year basis. As of the publication date of this MTW Annual Plan, HABC has not received notification of projected HUD funding amounts for calendar year 2022. In view of the uncertainty regarding available funding, the planned activities detailed in the MTW Annual Plan are subject to modification based on final funding levels.

### A. Background on the MTW Demonstration

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

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

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

For purposes of this Annual Plan, an “MTW activity” is defined as any activity that requires MTW flexibility to waive statutory or regulatory requirements. The MTW activities to be undertaken by HABC in Fiscal Year 2022 are all designed to promote one or more of the MTW statutory objectives.

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

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

HABC’s Strategic Plan, Pathways to Success, was published in 2019 and is the agency’s 10-year roadmap to advance our mission, vision and goals by defining our priorities and identifying clear objectives to be achieved over the long term. While the focus of the Strategic Plan is to help HABC move forward in our pursuit to build and preserve affordable housing in Baltimore City, it is also about transformation. The strategies outlined in Pathways to Success are designed to assist HABC in repositioning itself to be the city’s preeminent provider of affordable housing.

Through our Public Housing, Housing Choice Voucher and other programs, HABC serves over 20% of all renter households in Baltimore. This agency not only acts as a landlord, but also a developer, employer, landowner, service provider and partner. As we seek to be a catalyst for change in Baltimore’s neighborhoods and create opportunities for vulnerable families and individuals, we must also look within to ensure that we are carrying out our mission in the most inclusive and equitable ways possible. To do this, HABC intends to perform an agency-wide assessment to evaluate our internal and external efforts and align them with the goal of furthering diversity, equity and inclusion. We anticipate that this will become an integral part of our short- and long-term objectives and will shape our approach to conducting business in many ways, including the following:

### **1. Internal Operations**

- Practices involving recruitment; retention; workforce planning; training; professional development; and employee engagement.

### **2. Creating and Preserving Affordable Housing**

- Equitable neighborhood investment in our redevelopment initiatives and the preservation of existing assets.

### **3. Resident Services**

- Opportunities for self-sufficiency and economic mobility; access to homeownership opportunities; bridging the digital divide.

#### 4. Mobility

- Mobility and access to communities of opportunity for those we serve; initiatives designed to improve health, employment and education outcomes for families.

HABC is committed to carrying out its mission to create and provide quality affordable housing opportunities in sustainable neighborhoods in a manner that honors diversity. We understand that in order to change systems, we must examine our work through an equity lens. In 2022, HABC plans to seek out a consultant to assist us with performing an agency-wide equity assessment, and we will incorporate the recommendations from this evaluation into our Strategic Plan. We are confident that by prioritizing diversity, equity and inclusion in our operations and decision making, it will vastly improve our impact on the communities we serve.

### C. MTW Goals and Objectives for Fiscal Year 2022

In support of our Strategic Plan as well as our aim to Respond, Return, Reassure and Reinvent, the summary below provides highlights of HABC's activities and goals for FY 2022.

**Public Housing Occupancy** – HABC projects that 5,932 households will be served in FY 2022

**Voucher Utilization** – HABC projects that, on average, it will have 18,606 MTW units under lease each month, including Thompson vouchers.

**Project-Based Voucher Utilization** – HABC projects that 2,816 housing units will be under contract in the Project-Based Voucher (PBV) program by the end of FY 2022, including 164 planned units to be placed under contract during the fiscal year.

**Capital Program** – HABC will implement capital improvements at existing housing developments and scattered sites using MTW Block Grant funds (see Table 5). In FY 2022, HABC projects that it will expend approximately \$19.7 million on capital projects.

**Development Program** – HABC will undertake development activities designed to support the revitalization of Baltimore neighborhoods and replace distressed and obsolete public housing developments, including the request for disposition of six single-family lots for possible future homeownership as part of the O'Donnell Heights Phase I plan, in addition to a portion of the site identified as Phase II in FY 2022. HABC will also look to purchase and rehab an additional 3 units in FY 2022 as part of the Bailey Supplemental Decree. HABC will continue to implement the Perkins Somerset Oldtown (PSO) Transformation Plan, which includes the demolition of 629 units at Perkins Homes that will be replaced with newly constructed public housing units that

will be located throughout a new mixed-income community. This initiative was made possible through a \$30 million Choice Neighborhoods grant from HUD and will leverage approximately \$1 billion of investment within the PSO footprint.

**Rental Assistance Demonstration Program (RAD)** – Under RAD, public housing developments can be converted to Project Based Rental Assistance (PBRA) or to Project Based Voucher (PBV) assistance. Developments converted under RAD to either PBRA or PBV have a new ownership structure including a new management and maintenance team. HABC continues to have an ownership role (through its affiliates) and ongoing roles related to admissions, transfers and compliance monitoring. Developments converted under RAD PBV will involve HABC as the contract administrator of the Housing Assistance Payment Contract with the project owner. Conversion under RAD generates new capital resources, preserves existing affordable housing resources, ensures long-term affordability and improves the quality of life for residents. At the close of FY 2021, HABC anticipates that it will have closed on 26 RAD developments, consisting of 3,975 units. In FY 2022 and beyond HABC anticipates that an additional 1,992 units at 11 developments will undergo RAD conversions. 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 affected public housing residents, as well as local and citywide resident organizations, prior to submission of future RAD applications.

**Resident Services** – HABC plans to serve its public housing residents through a wide array of self- sufficiency, personal development and supportive service program offerings, including adult education classes, reading readiness for children entering school, a small business incubator, Ticket to Work and MyGoals for Employment Services.

**Proposed MTW Activities** – HABC is proposing two new MTW activities in FY 2022, which are the Student Housing Initiative (SHI) and the Leasing Incentive Program (LIP).

Under the SHI, HABC plans to utilize MTW Block Grant funding flexibility to support a housing stability program for matriculated, low-income college students who graduated from a Baltimore City high school and who meet HUD’s criteria of an independent student. HABC will work in partnership with colleges and universities in Baltimore City to launch the Student Housing Initiative (SHI) program, which will provide 10 time-limited housing subsidies to eligible low- income college students.

Using its MTW flexibility, HABC will establish a Leasing Incentive Program (LIP) to promote utilization of vouchers and provide increased housing options and opportunities for voucher holders. Additionally, to further reduce the vacancy rates in underutilized/hard to house Public Housing (PH), the LIP will provide incentives for applicants to lease PH units in these underutilized/hard to house areas/developments or portions thereof.



***Office of Resident Services MTW Homeownership Programs*** – In FY 2022, HABC plans to combine its homeownership activities to reflect all available MTW homeownership options in one activity. The MTW Homeownership Program works with public housing residents, HCV participants and other eligible low-income households in preparation for first-time homeownership. As part of 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.

***Homelessness Prevention Initiatives*** – HABC provides up to 900 Housing Choice Vouchers to eligible chronically homeless households referred by the Mayor’s Office of Homeless Services (MOHS). These set-aside vouchers do not require MTW Authority. In FY 2021, HABC added 50 vouchers to this set-aside (which increased the vouchers to 900), with a preference to assist families with at least one child under the age of 18. Participants use their vouchers to find affordable permanent housing while receiving supportive services from MOHS and partner agencies. In FY 2022 HABC anticipates that all vouchers set-aside for homeless individuals and families will be utilized.

***The Project-Based Homeless and Veterans Set Asides*** – Using its MTW authority, HABC has 195 units under HAP contracts for Project-Based units designated to house the homeless. These project-based homeless vouchers are included in the 900 vouchers that have been set aside for the homelessness prevention initiative. Additionally, HABC has been awarded 140 vouchers for units designated to house homeless veterans and their families.

***The Re-Entry Program*** – HABC implements a Re-Entry set-aside voucher program to link permanent housing with supportive services for up to 250 ex-offender households. Referrals are made to HABC by MOHS. By the end of FY 2022, HABC anticipates that all 250 Re-Entry set-aside vouchers will be utilized.

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

## Notes on Thompson and Bailey Settlements

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

1. The class action suit *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);
  - The continuation of the Thompson Homeownership Voucher Program; and
  - The development of 90 to 100 scattered sites units in communities in Baltimore City as specified in the Thompson settlement agreement.
    - HABC engaged NHP as the developer and 94 Hollander Ridge units were created and have been occupied.

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

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

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

## II. General Housing Authority Operating Information

### A. Housing Stock Information

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

#### i. Planned New Public Housing Units

**Table 1: Planned New Public Housing Units in FY 2022**

AMP Name and Number	Bedroom Size						Total Units	Population Type**	# of UFAS Units	
	0/1	2	3	4	5	6+			Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing/Vision)
MD002/0208 Scattered Sites	10						10	Other	1	0
	10								1	0
<b>Total Public Housing Units to be Added in the Plan Year</b>							<b>10</b>			

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

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

If "Population Type is "Other" please describe:

Non-Eldely Persons with Disabilities

#### ii. Planned Public Housing Units to Be Removed

As shown on Table 2, HABC plans to demolish and/or dispose up to 1,298 units in FY 2022. While Table 2 provides an estimate of the number of units to be removed from the public housing inventory during the Plan Year, the actual number may vary depending on the

timetables for HUD and City of Baltimore approvals, project financing, RAD closings and other factors.

**Table 2: Planned Public Housing to Be Removed in FY 2022**

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/0009 O'Donnell Heights	6 Vacant Lots	HABC may submit a disposition application to HUD in FY 2022 for the disposition of 6 single-family lots for the developer to build for-sale housing units as a part of Phase 1 redevelopment. Planning for redevelopment of Phase 2, consisting of 27 vacant acres is underway and a disposition application will be submitted in FY 2022.
MD002/000003 Perkins Phase 2	76	Perkins Homes Phase 2 will be redeveloped as part of the Perkins Somerset Oldtown Transformation Plan and HUD Choice Neighborhoods (CN) Award. HABC may submit a demo and disposition application for these units in FY 2022. For those phases financed with 4% Low Income Housing Tax Credits and Multi-Family Tax-Exempt Housing Bonds, the CN replacement units will be subsidized with a combination of RAD Project-Based Vouchers (RAD-PBV) and Project-Based Vouchers (PBVs).
MD002/000003 Perkins Phase 3	71	Perkins Homes Phase 3 will be redeveloped as part of the Perkins Somerset Oldtown Transformation Plan and HUD Choice Neighborhoods (CN) Award. HABC may submit a demo and disposition application for these units in FY 2022. For those phases financed with 4% Low Income Housing Tax Credits and Multi-Family Tax-Exempt Housing Bonds, the CN replacement units will be subsidized with a combination of RAD Project-Based Vouchers (RAD-PBV) and Project-Based Vouchers (PBVs).
MD002/000003 Perkins Phase 4	70	Perkins Homes Phase 4 will be redeveloped as part of the Perkins Somerset Oldtown Transformation Plan and HUD Choice Neighborhoods (CN)

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		Award. HABC may submit a demo and disposition application for these units in FY 2022. For those phases financed with 4% Low Income Housing Tax Credits and Multi-Family Tax-Exempt Housing Bonds, the CN replacement units will be subsidized with a combination of RAD Project-Based Vouchers (RAD-PBV) and Project-Based Vouchers (PBVs).
MD002/000003 Perkins Phase 5	112	Perkins Homes Phase 5 will be redeveloped as part of the Perkins Somerset Oldtown Transformation Plan and HUD Choice Neighborhoods (CN) Award. HABC may submit a demo and disposition application for these units in FY 2022. For those phases financed with 4% Low Income Housing Tax Credits and Multi-Family Tax-Exempt Housing Bonds, the CN replacement units will be subsidized with a combination of RAD Project-Based Vouchers (RAD-PBV) and Project-Based Vouchers (PBVs).
MD002/000003E Somerset Phase 4	89	Somerset Phase 4 will be redeveloped as part of the Perkins Somerset Oldtown Transformation Plan and HUD Choice Neighborhoods (CN) Award. HABC may submit a demo and disposition application for these units in FY 2022. For those phases financed with 4% Low Income Housing Tax Credits and Multi-Family Tax-Exempt Housing Bonds, the CN replacement units will be subsidized with a combination of RAD Project-Based Vouchers (RAD-PBV) and Project-Based Vouchers (PBVs).
MD002/004 Poe Homes	288	HABC may submit a disposition/demo application to HUD for Poe Homes as part of the Poe Homes Transformation Plan.
MD002/031 * Rosemont Low-Rise Townhomes	106	Planned RAD Conversion. HABC may submit a disposition application to HUD for Rosemont Low-Rise Townhomes redevelopment plan.
MD002/031 * Dukeland	30	Planned RAD conversion. HABC may submit a disposition application to HUD

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
		for Dukeland's redevelopment plan. (To be combined with Shipley Hills).
MD002/0203 Shipley Hills	24	Planned RAD conversion. HABC may submit a disposition application to HUD for Shipley Hill's redevelopment plan. (To be combined with Dukeland).
MD002/0202 Laurens House	36	Planned RAD conversion. HABC may submit a disposition application to HUD for Laurens House redevelopment plan. (To be combined with Carey House).
MD002/0202 Carey House	23	Planned RAD conversion. HABC may submit a disposition application to HUD for Carey House's redevelopment plan. (To be combined with Laurens House).
MD002/000117 Reservoir Hill 2	40	Planned RAD Conversion. HABC may submit a disposition application to HUD for Reservoir Hill redevelopment plan.
MD002/000101 Arbor Oaks	62	Planned RAD conversion anticipated for the 2 <sup>nd</sup> quarter of 2022. HABC may submit a disposition application to HUD for Arbor Oak's redevelopment plan
MD002/000106 Townes at the Terraces	203	Planned RAD conversion anticipated for the 2 <sup>nd</sup> quarter of 2022. HABC may submit a disposition application to HUD for Townes at the Terraces redevelopment plan
MD002/000202 Scattered Sites 202 538 Laurens Street	1	Approved for demolition; HABC plans to auction.
MD002/000203 Scattered Sites 203 1834 Wilhelm Street	1	Approved for demolition; HABC plans to auction.
MD002/000203 Scattered Sites 203 2520 Boyd Street	1	Approved for demolition; HABC plans to auction.
MD002/000203 Scattered Sites 203 2522 Boyd Street	1	Approved for demolition; HABC plans to auction.
MD002/000202 Scattered Sites 202 1328 N. Mount Street	1	Approved for demolition; HABC plans to auction.
MD002/000201 Scattered Sites 201 1841 N. Montford Avenue	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000203 Scattered Sites 203 610 Glenoden Avenue	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
MD002/000202 Scattered Sites 202 914 N. Fremont Avenue	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
MD002/000203 Scattered Sites 203 1824 W. Fairmount Avenue	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
MD002/000200 Scattered Sites 200 822 E. North Avenue	1	The condition of the adjacent property poses a risk to the structural integrity of this unit
MD002/000200 Scattered Sites 200 1015 N. Caroline Street	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
MD002/000200 Scattered Sites 200 1023 E. Biddle Street	1	This unit has been deemed not viable due to an abundance of vacant properties on this block.
MD002/000201 Scattered Sites 201 1819 N. Montford Avenue	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
MD002/000201 Scattered Sites 201 2200 Greenmount Avenue	1	This unit has been deemed non-viable due to neighborhood conditions. It will be sold to a developer as part of a redevelopment proposal
MD002/000202 Scattered Sites 202 1805 Clifton Avenue	1	This unit experienced severe damage due to fire and requires a full gut rehabilitation exceeding 57.4% TDC
MD002/000109 Stricker Street Apartments 1306 N. Carey	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant.
MD002/000109 Stricker Street Apartments 1150 N. Carrollton Ave	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
MD002/000109 Stricker Street Apartments 1316 Mosher St, A.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
MD002/000109 Stricker Street Apartments 1316 Mosher St, B	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
MD002/000109 Stricker Street Apartments 1323 Mosher St	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000109 Stricker Street Apartments 1718 W. Presstman St.	1	Unit is not viable due to neighborhood conditions and would not provide safe housing for an HABC tenant
MD002/000201 Scattered Sites 201 724 McCabe Avenue (21212)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 509 E. 22nd Street (21218)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 2012 E. 30 Street (21218)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 2444 Lauretta Avenue (21223)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 1030 Valley Street (21202)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000109 Stricker Street Apartments 1713 N. Calhoun Street (21217)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 618 E. 37th Street (21218)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000202 Scattered Sites 202 1113 N. Gilmor St (21217)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000203 Scattered Sites 203 2912 Walbrook Ave (21216)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000200 Scattered Sites 200 411 North Avenue-(21202)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 320 E 27th Street (21218)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 1401 N Luzern Ave (21213)	1	Unit to be transferred to the Scattered-Sites Homeownership Program and will be sold to the current occupant.
MD002/000201 Scattered Sites 201 318 E 20 <sup>th</sup> Street	1	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.



PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000201 Scattered Sites 201 320 E 20 <sup>th</sup> Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 324 E 20 <sup>th</sup> Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 328 E 20 <sup>th</sup> Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 336 E 20 <sup>th</sup> Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 324 E 20 ½ Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 2002 Barclay Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 2006 Barclay Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000201 Scattered Sites 201 2008 Barclay Street	1 Vacant Lot	HABC plans to execute an exchange agreement with the City of Baltimore for this vacant lot to be included in a City-driven neighborhood revitalization project.
MD002/000202 Scattered Sites 202 636 N Carrollton Ave 1FL-(21217)	1	Unit to be removed from inventory due to neighborhood conditions and an abundance of vacant units in the 600 block of N Carrollton Ave

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
MD002/000202 Scattered Sites 202 636 N Carrollton Ave 2FL-(21217)	1	Unit to be removed from inventory due to neighborhood conditions and an abundance of vacant units in the 600 block of N Carrollton Ave
MD002/000202 Scattered Sites 202 823 N Fremont Ave, 1FL-(21217)	1	Unit to be disposed of due to the condition of the neighborhood and high number of vacant properties on adjacent blocks
MD002/000202 Scattered Sites 202 823 N Fremont Ave, 2FL-(21217)	1	Unit to be disposed of due to the condition of the neighborhood and high number of vacant properties on adjacent blocks
MD002/0201 Scattered Sites 201 505 E. 26 <sup>th</sup> St.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0201 Scattered Sites 201 527 Beaumont Ave.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0201 Scattered Sites 201 712 E. 20 <sup>th</sup> St.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0201 Scattered Sites 201 2112 N. Calvert St. Unit A	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0201 Scattered Sites 201 2112 N. Calvert St. Unit B	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0201 Scattered Sites 201 2114 N. Calvert St. Unit A	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0201 Scattered Sites 201 2114 N. Calvert St. Unit B	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0202 Scattered Sites 202 1915 Herbert St.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0203 Scattered Sites 203 3907 Park Heights Ave.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0203 Scattered Sites 203 5318 Beaufort Ave.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0203	1	HABC has determined property is non-

PIC Dev.#/AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Scattered Sites 203 5326 Beaufort Ave.		viable and will dispose of in accordance with scattered site strategy.
MD002/0203 Scattered Sites 203 5330 Beaufort Ave.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0200 Scattered Sites 200 713 Mura St.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0200 Scattered Sites 200 715 Mura St.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0200 Scattered Sites 200 727 Mura St.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MD002/0200 Scattered Sites 200 1115 Greenmount Ave.	1	HABC has determined property is non-viable and will dispose of in accordance with scattered site strategy.
MS002/00022 Westport Homes 2401 Alaska Court	Does not result in removal of any public housing units	HABC will demolish this community center. The building is physically obsolete/non-viable. The space will be used for recreation and green space.
<b>TOTAL NUMBER OF UNITS</b>	1,298	

\*Sites share the same MD number; however they represent 2 different developments.

### iii. Planned New Project-Based Vouchers

HABC plans to enter into an Agreement to Enter into Housing Assistance Payment (AHAP) Contracts or HAP contracts for 164 new project-based units in FY 2022, as shown in Table 3. HABC anticipates 2 properties totaling 68 units will go through RAD PBV conversions in 2022. Actual contract/leasing figures may vary based on multiple factors, including new and/or additional projects approved by the HABC Board during the Plan Year, HUD RAD processing timetables and other considerations.

**Table 3: Planned New Project-Based Vouchers**

Property Name	Number of Vouchers to be Project- Based	RAD?	Description of Project
Perkins 2	52	Yes	52 RAD PBV units at PSO
Perkins 2	16	Yes	8 RAD PBV units at PSO
Perkins 2	8	No	8 PBV units at PSO

Property Name	Number of Vouchers to be Project-Based	RAD?	Description of Project
Beacon House Square	56	No	56 units located at 3549-3601 Old Frederick Road with a designation for PB for Veterans
Eagle Park (Thompson)	12	No	AHAP will be executed in 2022, occupancy in 2023.
Red Maple Place (Thompson)	10	No	AHAP will be executed in 2022, occupancy in 2023.
Fort 700 Project 2 (Thompson)	5	No	Scattered site properties in opportunity areas throughout the region
Fort 700 Project 3 (Thompson)	5	No	Scattered site properties in opportunity areas throughout the region
<b>Total Planned New Project-Based Vouchers</b>	<b>164</b>		

#### iv. Existing Project-Based Vouchers

HABC will continue to provide voucher-based operating support for a large portfolio of existing units under contract in the PBV program or units for which an Agreement to Enter into Housing Assistance Payments (AHAP) Contract is in place. Table 4 includes only those project-based vouchers in which at least an AHAP is in place as of 12/31/2021. As noted, there are 2,652 units in this category. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the HABC Board during the Plan year, HUD RAD processing timetables and other considerations.

**Table 4: Planned Existing Project-Based Vouchers**

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
18 W. Read St., Inc.	10	Leased/Issued	No	10 1bd NED units at 18 W. Read St.
1234 McElderry St	50	Committed	No	13 1bd, 24 2bd and 13 3bd units for PH replacement at 1234 McElderry St.
214 E. Biddle St.	5	Leased/Issued	No	5 1bd NED units at 214 E. Biddle St.
22 Light Street Apartments	2	Committed	No	New construction of 40 units in Downtown Baltimore of which 2 will be project-based units.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
2301 N. Charles St., Inc.	7	Leased/Issued	No	1 efficiency and 5 1bd NED/UFAS units at 2301 N. Charles St.
Alcott Place	28	Leased/Issued	No	28 1bd units at 2702 Keyworth Ave.
Artaban Ashburton Apartments	14	Leased/Issued	No	14 1bd NED units at 5906 Park Heights Ave.
Ashland Commons	12	Leased/Issued	No	12 1bd (8-NED) units at 1715 E Eager St.
Barclay	19	Leased/Issued	No	1 1bd, 1 2bd, and 17 3bd (1-NED, 4-UFAS) units at 2106-2234 Barclay St.
Barclay II (North Barclay Green)	15	Leased/Issued	No	11 1bd NED and 4 2bd UFAS units at 341 E. 20 <sup>th</sup> St.
Barrister Court	7	Leased/Issued	No	2 efficiencies, 5 1bd, and 1 2bd UFAS unit at 1300 Washington Blvd.
Belvieu Gardens	10	Leased/Issued	No	10 1bd NED units at 3915-3921 Belvieu Ave.
Bellevue Manchester	8	Leased/Issued	No	8 1bd units at 342 Bloom St.
Bennett House	25	Leased/Issued	No	24 SROs and 1 1bd unit at 14 E Franklin St. designated to provide supportive services to low-income residents
Bon Secours – Gibbons	20	Leased/Issued	No	12 1bd NEDs, 4 2bd and 4 3bd UFAS units at 900 Desoto Rd.
Bon Secours – New Shiloh	19	Leased/Issued	No	16 1bd (11-NED), 2 2bd and 1 3bd units at 1930 Windsor Ave. (8-PB Homeless)
Brexton Chase	7	Leased/Issued	No	7 1bd NED units at 241 W. Chase St.
Brick by Brick	2	Leased/Issued	No	2 1bd NED units at 903 Gorsuch Ave.
Butchers Row	9	Leased/Issued	No	3 1bd, 2 2bd, and 4 3bd units at E. Baltimore St.
Calvert Street Properties	18	Leased/Issued	No	18 1bd NED units at 1625 N. Calvert St.
Calverton House	14	Leased/Issued	No	13 SROs and 1 efficiency at 119 E. 25 <sup>th</sup> St.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
Chapel Green	20	Leased/Issued	No	8 1bd NED units and 12 3bd (4-UFAS) units at Chase, Wolfe, and Washington Streets
Cherry Hill Senior Housing	50	Leased/Issued	No	48 1bd NED units and 2 2bd UFAS units at 901 Cherry Hill Rd.
Cherrydale	32	Leased/Issued	No	32 1bd NED units at 1118 Cherry Hill Rd.
City Arts	11	Leased/Issued	No	11 1bd NED units at 440 E. Oliver St.
City Arts II	15	Leased/Issued	No	12 1bd NED and 3 2bd UFAS units at 1700 Greenmount Ave.
Clare Court Apartments	15	Leased/Issued	No	5 1bd, 7 2bd and 3 4bd (7-NED, and 3-UFAS) units at 3725 Ellerslie Ave.
Clarks Lane	6	Leased/Issued	No	6 1bd NED units at 3901 Clarks Ln.
Clarksvew, LLC	8	Leased/Issued	No	8 1bd NED units at 3701-3711 Clarks Ln.
Coel-Grant Higgs	57	Leased/Issued	No	32 efficiencies and 25 1bd (6-UFAS) units at 1700 N Gay St.
Coleman Manor	49	Leased/Issued	No	49 1bd (8-NED, 5-UFAS) units at Walbrook Ave.
Columbus School Apts.	8	Leased/Issued	No	8 1bd units at 2000 E North Ave
Community Housing	6	Leased/Issued	No	1 efficiency, 1 1bd, 1 2bd, and 3 3bd scattered site units
Dayspring	18	Leased/Issued	No	17 2bd and 1 3bd transitional units at 1125 Patterson Park
DiMaggio Scattered Sites	23	Leased/Issued	No	8 2bd, 10 3bd, 4 4bd, and 1 5bd units designated for chronically homeless households at scattered sites
Dominion Properties	7	Leased/Issued	No	3 1bd NED units and 4 3bd units at 1617 Dukeland Ave., 6 <sup>th</sup> St., Hilton and Monument Streets

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
Dorchester Apts.	10	Leased/Issued	No	10 1bd NED units at 4300 Liberty Heights Ave.
Druid Hill LTD	12	Leased/Issued	No	10 2 bd and 2 3bd units at 1621 Druid Hill Ave.
Druid House	19	Leased/Issued	No	8 2bd and 11 3bd units at McCulloh St.
Epiphany House	33	Leased/Issued	No	33 efficiencies at 5610 York Rd.
Fallstaff Apts.	4	Leased/Issued	No	2 1bd NED units, 1 2bd and 1 3bd (1-UFAS) units at 3800-3810 Fallstaff Rd.
Fells Point Station	14	Leased/Issued	No	11 1bd and 3 2bd (6-NED, 8-UFAS) units at 1621 Bank St.
Four Ten Loft Apts	20	Leased/Issued	No	20 - 1bd units at 410 N Eutaw St. designated for PB homeless.
Flamingo Apartments	1	Committed	No	1 3bd LTA UFAS unit located at 3900 Conduit Ave
Franklin Flats	7	Leased/Issued	No	7 1bd NED units at 20 E. Franklin St.
Greenmount & Chase	19	Leased/Issued	No	11 1bd, 5 2bd and 3 3bd units (2 NEDs, 22 UFAS, 4 PB Homeless) located at 1107 Greenmount and 700 E Chase St.
Greens at Irvington Mews	20	Leased/Issued	No	20 - 1bd NED units at 4300 Frederick Ave.
Harry & Jeannette Weinberg Place	88	Leased/Issued	No	85 efficiencies and 3 1bd units at 2500 W. Belvedere Ave.
Holden Hall	14	Leased/Issued	No	14 SRO units at 761 W. Hamburg St.
Indecco	9	Leased/Issued	No	2 efficiencies and 7 1bd units at 940 S. Lakewood Ave.
Independence Place	21	Leased/Issued	No	11 1bd and 10 2bd units designated for chronically homeless households at 4101½ Old York Rd.
Irvington Woods	57	Leased/Issued	No	11 1bd NED and 46 2bd units at 4102-4126 Potter St.
JByrd	3	Leased/Issued	No	3 1bd NED units at Windsor Mill Rd.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
Jenkins House	22	Leased/Issued	No	20 SRO and 2 1bd units at 2226 Maryland Ave.
John Manley House	5	Leased/Issued	No	5 1bd NED units at 5304 Harford Rd.
Keys Pointe – Phase 1B	34	Leased/Issued	No	19 1bd, 8 2bd, 4 3bd and 3 4bd (11-NED, 4-UFAS) units at Cardiff, Jarmon, Hornell, Boston and Gallop Streets
L on Liberty	14	Leased/Issued	No	14 1bd (all NED) units at 216 N Liberty St.
Lillian Jones Apts.	22	Leased/Issued	No	14 1bd NED, 2-2bd and 6-3bd UFAS units at 1303 Greenmount Ave.
M on Madison	23	Leased/Issued	No	23 1bd NED units at 301 W. Madison St.
Marian House	8	Leased/Issued	No	4 SRO and 4 3bd units at 949 Gorsuch Ave.
Marian House II	5	Leased/Issued	No	5 1bd (3-NED, 2-UFAS) units at 932 Gorsuch Ave.
Mary Harvin Center	8	Leased/Issued	No	8 1bd units at 1600 N. Chester St.
Metro Heights at Mondawmin	18	Leased/Issued	No	13 1 bd, 2 2bd and 3 3 bd (10-NED, 1-UFAS) units, some designated for chronically homeless households at 2700 Reisterstown Rd.
Milford Station	6	Leased/Issued	No	6 1bd NED units at 3900 W. Northern Pkwy.
Moravia	60	Leased/Issued	No	57 1bd and 3 2bd units (9-NED, 6-UFAS) at 6050 Moravia Park Dr.
Mount Royal Apts.	5	Leased/Issued	No	5 1bd units at 1512 W. Mt. Royal Ave.
Mulberry at Park Apts.	19	Leased/Issued	No	11 1bd NED units, 2 2bd and 6 3bd UFAS units at 211 W. Mulberry St.
North Barclay Green III	12	Leased/Issued	No	9 1bd units and 3 3bd UFAS units at E. 21 <sup>st</sup> St. and Greenmount Ave.



Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
North Avenue Gateway	16	Leased/Issued	No	11 1bd NED units and 5 2bd units at 3001-3003 W. North Ave.
North Avenue Gateway II	16	Leased/Issued	No	10 1 bd NED units and 5 2bd units at 3001-3003 W. North Ave.
Oaks at Liberty	45	Leased/Issued	No	45 1bd units at 3501 Howard Park Ave.
O'Donnell Heights	42	Leased/Issued	No	16 1bd (12-NED) units, 12 2bd units, 13 3bd units, and 1 4bd unit (4-UFAS)
Orchard Ridge I-V	197	Leased/Issued	No	119 1bd units, 42 2bd units, 32 3bd units, 3 4bd units and 1 5bd unit (52-NED, 27-UFAS) at Orchard Ridge Blvd., Green Rose and Maple Shade Dr.
Paca House	82	Leased/Issued	No	41 efficiencies and 41 1bd units at 116 N. Paca St. 63 units are designated for homeless and 19 units for veteran populations.
Parktown-Cason Arms	12	Leased/Issued	No	8 1bd NED units and 4 2bd UFAS units at 4637 Park Heights Ave.
Penn North	15	Leased/Issued	No	14 1bd NED units and 1 3bd UFAS unit at 2600 Pennsylvania Ave.
Penn Square II	15	Leased/Issued	No	12 1bd NED and 3 3bd UFAS units at 2600 Pennsylvania Ave.
Perkins 1	28	Committed	No	28 units at PSO
Perkins 1	20	Committed	Yes	20 RAD PBV units at PSO
Parkwood	3	Leased/Issued	No	3 1bd NED units at scattered sites
Poppleton II	15	Leased/Issued	No	11 1bd NED units and 4 3bd UFAS units at 838 W. Fairmount Ave.
Poppleton III	10	Leased/Issued	No	7 1bd NED units, 1 2bd UFAS and 2 3bd UFAS units at 866 W. Fayette St.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
Pratt Street	35	Leased/Issued	No	27 2bd and 8 3bd units at 1700 W Pratt St. – transitional housing
Restoration Gardens	43	Leased/Issued	No	40 efficiencies and 3 1bd units designated for homeless youth at 3701 Cottage Ave.
Restoration Gardens II	42	Leased/Issued	No	42 efficiencies (3-UFAS units) designated for homeless youth at 4201 York Rd.
Seminole Apartments	6	Leased/Issued	No	6 1bd NED units at 4300 Seminole Ct.
Sharon Towers	10	Leased/Issued	No	10 2bd units at 4-6 N. Carey St.
Sharp Leadenhall	4	Leased/Issued	No	4 1bd units (3-UFAS) at Race and West Streets
Sojourner at Argyle Apartments	12	Leased/Issued	No	12 1bd (2-UFAS) units designated for chronically homeless households at 1411 Argyle St.
Sojourner Place at Preston	35	Committed	No	25 1bd, 5 2bd and 5 3bd units located at 1208 E Preston St.
Somerset 2 (520 Somerset Apartments)	44	Committed	Yes	44 RAD PBV units at PSO 520 Somerset Street
Somerset 2 (525 Aisquith Apartments)	23	Committed	Yes	23 RAD PBV units at PSO 525 Aisquith Street
Somerset 2 (525 Aisquith)	33	Committed	No	33 PBV Blend Units at PSO
Somerset 3 (420 Aisquith)	15	Committed	Yes	15 RAD PBV units at PSO
Somerset 3 (420 Aisquith)	21	Committed	No	21 PBV units at PSO
Somerset Extension	7	Committed	No	7 1bd NED units located at 1400 E Monument St.
St. Stephens	15	Leased/Issued	No	15 1bd NED units at 3900 Roland Ave.
St. Vincent DePaul	9	Leased/Issued	No	8 2bd and 1 3bd units at Ulman Ave.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
St. Vincent DePaul	5	Leased/Issued	No	1 3bd and 4 4bd units designated for chronically homeless households at Bond St. and Cottage Ave.
Symphony Home at Purdue	6	Leased/Issued	No	6 1bd units at 5683 Purdue Ave.
Union Ave. – Buena Vista Apartments	48	Leased/Issued	Yes	15 1 bd and 33 2 bd units converted through Rental Assistance Demonstration (RAD-2) at 1420-1436 Union Ave.
Uplands	62	Leased/Issued	No	24 1bd, 31 2bd, and 7 3bd units (16-NED, 6-UFAS) at 4520 Scarlet Oak Ln.
Walbrook Mills Apts	1	Leased/Issued	No	1 3bd (UFAS) unit at 2636 W North Ave.
Wayland Village	45	Leased/Issued	No	45 1bd (14-NED) units at 3020 Garrison Blvd.
Weinberg Family Center – 1209 Rose	8	Leased/Issued	No	5 2bd and 3 3bd units designated for chronically homeless households at 1209 N. Rose St.
Weinberg Family Center – Guadenzia at Park Heights	18	Leased/Issued	No	14 2bd and 4 3bd units designated for chronically homeless households at 4613 Park Heights Ave
Weinberg Manor East	75	Leased/Issued	No	10 SRO, 41 efficiencies, and 24 1bd units (10-NED, 5-UFAS) at 3601 Fords Ln.
Weinberg Manor South	14	Leased/Issued	No	14 1bd NED units at 3617 Fords Ln.
Westminster House	163	Leased/Issued	No	103 efficiencies, 55 1bd, and 5 2bd units at 524 N. Charles St.
Berger Square (Thompson)	10	Leased/Issued	No	A project located in Odenton in Anne Arundel County, near transit, employment centers near Fort Meade and Arundel Mills, and close to the MARC station.
Burgess Mills (Thompson)	20	Leased/Issued	No	A 198 unit mixed-income project located in Ellicott City in Howard County.

Property Name	Number of Project-Based Vouchers	Planned Status at End of FY 2022	RAD?	Description of Project
Ellicott Gardens (Thompson)	14	Committed	No	A 70 unit project located in Ellicott City in Howard County, a second phase of an existing project.
Scattered Sites -Pilatus Opportunity Fund (Thompson)	30	Leased/Issued	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites -Harford Home Rentals (Thompson)	10	Leased/Issued	No	Scattered site units in high-opportunity areas throughout the region.
Scattered Sites – Fort 700 (Thompson)	5	Leased/Issued	No	Scattered site units in high-opportunity areas throughout the region.
Homes at Fountain Green (Thompson)	10	Leased/Issued	No	New construction in Harford County, of which 10 units will be BRHP project-based units. Project is currently at 97% construction completion and leasing will begin in coming month
<b>Total</b>	<b>2,652</b>			

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

HABC previously completed an asset review of the Scattered Sites inventory, which was submitted to the local HUD office. The review has a five-pronged approach to provide a roadmap and framework for demolition and/or disposition of obsolete units as well as the preservation of existing units, including the items below. HABC continues to use this approach to inform changes in MTW housing stock.

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

In addition, Appendix A includes HABC's Asset Management Table, which is periodically updated to provide an overview of planned or potential development, disposition, conversion and/or homeownership activities at HABC sites.

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

HABC will implement a wide range of capital investments at existing public housing sites and continue its program of citywide housing development activities as summarized on Table 5. Additional discussion of capital plan, energy, infrastructure and extraordinary maintenance issues and initiatives is included below. As summarized in Table 5, HABC projects it will expend a total of approximately \$19.7 million on capital-related activities in FY 2022. Actual projects, timetables and expenditures may vary. HABC may modify its planned capital expenditures during the Plan year based on changing priorities, emergency conditions and other factors. Pursuant to the MTW Agreement, HABC has combined all current and prior year Capital Funds, including RHF funds, into the MTW Block Grant that will be carried out in accordance with all HUD regulations, including 24 CFR Part 905, and other requirements applicable to the Capital Fund Program.

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

No.	Development Name	Description of Work	FY 2022 Planned Expenditures
1.	Latrobe Homes	Brick Work & Tuckpointing	200,000
2.	McCulloh Homes	Window Replacement, Site work	1,800,000
3.	Perkins Homes	Site Prep, Relocation Activities	275,000
4.	Poe Homes	Steam Traps and Radiator Valves, Emergency Repairs, Relocation Activities	675,000
5.	Douglass Homes	Exterior Doors, Non-Dwelling Structures, Management and Maintenance Facilities, Security Cameras, Security Lighting	590,000
6.	Gilmor Homes	Upgrade Steam Distribution System, Site Improvements, Replace all three-phase converter to single phase, Backflow Preventers, Lead Component Abatement	1,717,250
7.	O'Donnell Heights	Emergency Repairs	100,000
8.	Cherry Hill Homes	Sump Pumps, Install filtration system for Heating, Site Work, Upgrade interior light in apt buildings, Replace apt building doors throughout site with metal doors, Install bird nets on apt buildings throughout site, Remove and replace mailboxes in apt buildings to the exterior of building, Waterproofing and Tuckpointing, HVAC System Replacement	3,042,539

No.	Development Name	Description of Work	FY 2022 Planned Expenditures
9.	Brooklyn Homes	Ongoing Electrical Distribution Repairs, Evaluation, and Replacement; Window Security Screens	1,681,366
10.	Westport Homes	Window Replacement	500,000
11.	Arbor Oaks	RAD Subsidy	81,043
12.	Scattered Sites	Roofing Replacement, Renovate Long Term Vacant Units in Stable Neighborhoods, Window Replacement, Electrical Panel Upgrades, Emergency Repairs	650,000
13.	Central Office	Non-Technical Salaries and Benefits	650,000
14.	Central Office	Technical Salaries and Benefits	1,100,000
15.	Central Office	Admin and Operating Costs, Overhead, Sundry and Audit Fees	524,285
16.	Authority-Wide	Replace Kitchen Cabinets and Countertops, Replace Bathrooms Cabinets and sinks, Replace Windows, Electrical Work, Mechanical Work, Non-Dwelling Structures, Management and Maintenance Facilities, Vacancy Renovation, Site Improvements, Exterior Lighting Surveillance cameras, Building Number Signage, Key system entry and door	5,587,753
17.	Authority-Wide	A & E and Environmental Consulting Fees	220,000
18.	Authority-Wide	Legal, Planning, Information Technology and Utility Consulting Fees, etc.	381,000
			<b>\$19,775,236</b>

## Planned Capital Expenditures During the Plan Year

### 504 Accessibility Improvements

As of July 2021, 401 units that meet the UFAS requirements for wheelchair accessibility are available through HABC's Public Housing program. HABC will continue to: (i) maintain existing UFAS units, to the extent that they remain viable, common areas and accessible routes to ensure continued compliance with UFAS and the 2010 ADA standards; and, (ii) modify units to meet reasonable accommodation and immediate need requests.

HABC is creating additional UFAS units through the Perkins Somerset Old Town redevelopment project. In addition to replacing the 67 UFAS units that were in Perkins Homes, an additional 97 UFAS units are being created throughout the redevelopment phases for a total of 164 UFAS

units. The first eight UFAS units were created at 1234 McElderry (former Somerset Homes site) in June 2021 (1 one bedroom, 4 two-bedroom and 3 three-bedroom). Eight UFAS units are being created in Phase 2 and are expected to be ready for occupancy by the end of 2022.

All of HABC's mixed population properties have been converted to private ownership and management under the RAD Program. The new owners have renovated or are renovating the units and common areas. Several of the properties have added more UFAS units resulting in an increase of 62 certified UFAS units. All of the units in the RAD properties that are subsidized by Project Based Rental Assistance (PBRA) are occupied exclusively by residents on HABC's reasonable accommodation transfer waiting list and from HABC's public housing application waiting list.

### *Infrastructure and Extraordinary Maintenance*

In FY 2022 HABC will continue (i) to develop master plans that note physical areas of concern and a course of action to rectify them (landscaping, security, code upgrades, etc....), (ii) perform major renovations at various developments and a portion of the scattered site inventory to reduce vacancies, and (iii) conduct relocation activities in preparation for redevelopment of Perkins and Poe Homes.

Initiatives planned for FY 2021 to be completed in FY 2022 are site improvements and maintenance shop roof replacement at Cherry Hill Homes, window replacements at McCulloh Homes and Westport Homes, installation of sump pumps at various developments, upgrades to Gilmore Homes boiler and heating/hot water distribution systems and planning of site improvements of the areas left by the selective deconstruction of the apartment buildings at Gilmore Homes.

Major work in FY 2022 may include unit renovations at various developments and scattered sites and include entrance door replacement, kitchens, bathrooms, painting, and finishes. Continued repairs to heating and hot water systems at various developments and specifically at Poe Homes, Douglass Homes, Gilmore Homes, and Cherry Hill Homes including convactor controls, backflow preventors, filtration systems, additional sump pumps, and general mechanical work across HABC's inventory. The electrical distribution system at Brooklyn Homes will be maintained and repaired on an ongoing basis and evaluated for replacement in a future year, phase converters at Gilmore Homes will be eliminated, and general electrical work will take place across HABC's inventory. Site improvements are ongoing capital constraint on HABC and will be addressed as necessary. Brickwork/tuckpointing will be assessed and prioritized at Latrobe Homes and Cherry Hill Homes.

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

HABC is awaiting HUD approval to demolish the long-term vacant daycare center at Westport Homes. The building is in poor condition and capital funding is inadequate to rehabilitate it for any productive use. It is anticipated that HUD approval will be granted in order for the building to be demolished and the site stabilized prior to or in FY 2022.

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

HABC continues to monitor, measure and verify efforts for the Phase I Energy Performance Contracting (EPC) properties (Latrobe Homes, Cherry Hill Homes, Gilmor Homes, Westport Homes and Brooklyn Homes). A second EPC Program of approximately \$10.1 million began for the installation of conservation measures, including lighting, water conservation fixtures, utility metering and infrastructure and/or heating/hot water system upgrades at selected properties (Douglass Homes, Poe Homes, Dukeland Homes, Rosemont Homes, Oswego Mall, McCulloh Homes Low Rise, McCulloh Homes Townhomes, Laurens House, Mt Winans, Spencer Gardens, and Carey House). The second EPC was planned for a total of 15 years, inclusive of two years of construction and ECM installation. Due to unanticipated delays in executing the final loan documents, design, construction and ECM installation began in the first half of 2019. In addition, HABC decided to convert under RAD seven of the ten properties that were included in the EPC 2 program, resulting in those properties being removed. Rosemont Homes, Oswego Mall, Dukeland Homes, Laurens House, Carey House, Spencer Gardens and Poe Homes were removed from the Phase 2 EPC due to plans to convert those developments under RAD. Scattered site units were substituted in the EPC 2 to account for the removal of the intended RAD conversions. Due to this removal and substitution, the construction was initially extended to April 2021. The COVID 19 pandemic and lack of accessibility to units has hampered the construction schedule further and an additional extension has been requested to April 2022.

Currently approximately 90% of the original EPC 2 work is complete and installed. This includes the renegotiated steam tariff rates to incorporate savings for Douglass Homes; efficient water fixtures (toilets, faucets, aerators, shower heads) installations and/or replacements at all sites; exterior lighting at various sites; replacement of domestic hot water generator tanks and piping connections at McCulloh Homes; installation of gas fired furnaces at Rosemont Homes; installation of fixed set point thermostats at all sites; replacement of radiator control valves and steam traps at Douglass Homes. Work that is underway and due to be completed in 2021 includes the implementation of utility meters and/or software (electric, gas and water where applicable) and the replacement of the gas infrastructure at McCulloh Homes. Now that the additional scattered site replacement units have been identified, the energy conservation measures to be installed to finalize the EPC 2 project are being planned and scheduled for implementation.



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

### *Safety & Security Initiatives*

To enhance safety and security of our residents, HABC will continue the installation of enhanced security key systems (Medico/Keytrack), install security screens on accessible windows on designated priority units at Brooklyn Homes, add additional security cameras and security lighting at Douglass Homes (partially funded with a 2019 Security Grant), and replace the entrance doors and interior common entrance lighting in the apartment buildings at Cherry Hill.

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

HABC continues its partnership with MONSE, BCIT and BPD-Homeland Security Division. Through this collaboration HABC performs ongoing reviews for the useful life and operation of camera equipment at Cherry Hill, Gilmor Homes, Latrobe Homes, McCulloh Homes, and Poe Homes. Camera maintenance, safety and security concerns, and safety grants are some of the work performed as a result of these partnerships. The maintenance agreement for 173 cameras at 5 original locations (Gilmor, Latrobe, McCulloh, Cherry Hill, and Poe) was extended through June 2021 and is anticipated to be extended again through 2022.

This partnership also seeks opportunities to apply for private and governmental grants for the implementation of new cameras and security lighting at all sites. HABC submitted an award to the Department of Housing and Urban Development for the Safety and Security Grant for Douglass Homes to install fiber and six (6) cameras in under this partnership. Although the

grant was not awarded, the cameras and fiber will be installed with Capital funds. We applied for and were awarded a security grant for similar camera infrastructure work at McCulloh Homes. An additional camera was installed as requested at Brooklyn Homes using capital funds. Fiber installations, additional cameras and end of useful life upgrades are continuously evaluated for possible implementation at all sites to increase data connectivity/reliability and camera operations. The Benton Building upgrades have been completed with installation of monitors and live feed infrastructure to facilitate the real time viewing and monitoring of these sites at an HABC central location. The Security Operations Manager position has been filled and the office located within the Benton Building.

### Facilities & Real Estate

HABC continuously assesses and, as needed, renovates HABC facilities across the various developments and its Duncanwood Maintenance and Storage Facility. There is ongoing management of leased space at Benton Building and the West Pratt Street or Mount Clare Junction facilities. HABC leases the space at Duncanwood and will oversee any major changes or upgrades to the archive system as well as a disaster recovery/emergency response system at this location. HABC is evaluating the conversion of the day care center at Heritage Crossing into an application and leasing facility to be implemented in FY 2022.

## Development Initiatives

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

In addition to the projects noted below, HABC is also pursuing opportunities to preserve and develop affordable housing for low-income households, and as such, other development initiatives may occur in FY 2022.

### O'Donnell Heights

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

The developer has completed the first phase, consisting of two sub-phases, identified as Phase 1A and 1B. Renamed Key's Pointe, Phase 1 includes 144 affordable units. The six single-family lots that were included in Phase 1 will be developed for future homeownership and will be submitted for disposition to HUD in FY 2022.

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

This revitalization plan was approved by the Baltimore City Planning Commission in June of 2020. The completion of the revitalization plan will strengthen the developer's LIHTC application to the State should the Developer pursue 9% credits. The developer working with HABC is considering the merits of submitting a 4% Low Income Housing Tax credit application in advance of a 9% Low Income Housing Tax Credit Application in the next funding round, which is expected in 2022. A disposition application for the Phase 2 site area is planned for submission to HUD in FY 2022.

#### [Bailey Supplemental Decree Units](#)

Ten public housing units for non-elderly persons with a disability will be created through the acquisition and rehabilitation of units in neighborhoods identified in the Bailey Supplemental Decree. Acquisition of these units from the private market was previously delayed due to a combination of COVID-19 pandemic and higher home prices than anticipated, which meant the cost of renovation would have exceeded Total Development Cost (TDC) approved for this project. After HUD approved a higher TDC, under MTW, on September 21, 2020, HABC resumed screening properties for possible acquisition in November 2020. On April 6, 2021, 3990 Roland Avenue was acquired. The renovations for this property are projected to be completed by the third quarter of 2022. Through 2021, HABC will have acquired two of the ten Bailey units. In FY 2022, HABC anticipates that three additional units may be acquired.

#### [Thompson Settlement Agreement](#)

Pursuant to the Thompson Settlement Agreement, the Baltimore Regional Housing Partnership (BRHP) is continuing the project-based development program that was started under the Thompson partial consent decree. BRHP is implementing a project-based development program to create project-based units in Communities of Opportunity. Subject to funding availability, BRHP is making pre-development funding and, if needed, subordinate secondary financing using the Urban Revitalization Demonstration Grant funds awarded for the Homeownership Demonstration Program (MD-06-URD-002-I294), available to pre-qualified developers and

property owners who develop housing units and agree to enter into long term project-based voucher contracts.

BRHP continues to work with its development partners to create long-term affordable units in opportunity areas. BRHP anticipates that in FY 2022, 32 project-based units will either be created or placed under AHAP. Ten of the units will be scattered site units and 22 will be in multifamily LIHTC properties in Baltimore, Anne Arundel and Howard Counties.

#### *Hollander Ridge HOPE VI Project*

HABC has acquired 94 scattered site units in Baltimore City as identified in the Thompson Settlement Agreement and completed rehabilitation of these units in FY 2021. HUD approved the Hollander Ridge project as a mixed finance development so the units currently are public housing rental units. The Hollander Ridge project will be converted to RAD in the 4<sup>th</sup> quarter 2021. No changes are anticipated in FY 2022.

#### *Perkins Somerset and Oldtown Transformation Plan*

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

Demolition of the first 100 units began in June 2021. The demolition and disposition applications for the remaining 629 units will be submitted in FY 2022 if not earlier. HABC received HUD approval to convert all 629 public housing units at Perkins Homes under RAD in connection with a multi-phased replacement housing project

HABC intends to replace all of the existing Perkins UFAS units certified under the Bailey Consent Decree. In addition, the developer will provide a minimum of 7% additional mobility UFAS units pursuant to the Bailey Consent Decree and 2% hearing/vision UFAS units as per the PSO Choice award, as required by law. As of July 2021, 8 UFAS units were completed in Somerset Phase 1.

The Somerset Homes public housing site is being redeveloped in three phases and includes an additional phase (Somerset 3) to be completed off-site on an adjacent parcel owned by the Mayor and City Council of Baltimore that will be conveyed to HABC prior to financing closing of

this phase. HABC will convey the Somerset Homes site in phases to a single purpose entity controlled by Somerset Redevelopment, LLC. A total of 486 rental units will be constructed on the Somerset Homes site (Somerset Phases 1,2 & 4), consisting of 239 deeply affordable units (PBV and RAD PBV), 131 LIHTC units at 80% or less of Area Median Income and 116 market rate units. Somerset Phase 3 will include an additional 72 mixed-income units, of which 20 are market rate units, 16 are LIHTC units and 36 are a combination of RAD PBV and PBV units. The redevelopment of Somerset Homes also includes the construction of a new community park, to be known as the Nathaniel McFadden Learn and Play Park, and a network of new public streets resulting in a more pedestrian friendly, walkable community. As of July 2021, Somerset Phase I construction is complete which includes a total of 104 units, of which 20 are market rate units, 34 are LIHTC units and 50 are PBV units. In FY 2022, construction for Somerset Phase II will be completed with a total of 192 units which includes 33 market rate units, 60 LIHTC units and 100 are a combination of PBV and RAD PBV units.

The replacement units on the Perkins Homes public housing site and an adjacent City owned school site to be conveyed to HABC/BAHD, will be redeveloped in five phases. It will include a total of 788 units, comprised of 377 replacement units which will be a combination of RAD PBV and PBV, 256 market rate units and 155 LIHTC units as part of the CNI Housing Plan. Demolition of the first 100 units at Perkins Homes began on June 24, 2021. Perkins Phase I construction will begin in 1<sup>st</sup> quarter 2022 which includes a total of 103 units which includes 10 market rate units, 45 LIHTC units and 48 RAD PBV units. The remainder of the Perkins Homes units are anticipated to be demolished in FY 2021 through the fourth quarter of 2022.

For those phases in Somerset Homes and Perkins Homes that will be financed with multifamily housing bonds and 4% Low Income Tax Credits, the CNI replacement units will be subsidized with a combination of RAD-PBV and PBV.

### [Poe Homes](#)

HABC received a \$1.3 million HUD Choice Neighborhoods Planning & Action Activities Grants in September 2018 to support the planning of a financially feasible mixed-income redevelopment strategy for Poe Homes. Poe Homes consists of 288 public housing units that will likely convert to PBV under the RAD platform. In FY 2022, HABC plans to submit a disposition/demo application. Future plans for Poe Homes Phase I, will be completed off-site on an adjacent parcel acquired by HABC. Closing on 1<sup>st</sup> phase is anticipated in the fourth quarter of 2022.

The other component of the Choice Neighborhoods grant was for “Action Activities” i.e. capital improvement funds for projects in the Poppleton and Hollins Market neighborhoods near the Poe Homes property. The Action Activities grants are intended to sustain momentum during and after the 2-year planning process. They are as follows:

- Action Activity 1: Greater Model Park – new Splash Pad;
- Action Activity 2: Residential Façade/Aging in Place Grant Program for existing low-income homeowners in the Poppleton/Hollins Market neighborhoods;
- Action Activity 3: Hollins Market – Phase 3 of the planned redevelopment;
- Action Activity 4: Food Retail Initiative/New Grocery Store Technical Assistance: 101 North Schroeder Street; and,
- Action Activity 5: Healthy Corner Store Initiative (Existing Businesses) (another food retail initiative).

## B. Leasing Information

### i. Planned Number of Households Served

Table 6 provides information on the MTW households projected to be served by HABC as of the end of FY 2022.

**Table 6: Planned Number of Households Served at the End of FY 2022**

Planned Number of Households Served Through:	Planned Number of Units Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	71,184	5,932
MTW Housing Choice Vouchers (HCV) Utilized*	171,420	14,285
MTW Thompson Housing Choice Vouchers**	51,854	4,321
Local, Non-Traditional: Tenant-Based	N/A	N/A
Local, Non-Traditional: Property-Based	N/A	N/A
Local, Non-Traditional: Homeownership	N/A	N/A
<b>Planned Total Households Served</b>	<b>294,458</b>	<b>24,538</b>

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

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

**Table 7: Local, Non-Traditional Housing Programs**

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

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

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

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

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	In units where HABC has made 3 unsuccessful attempts to lease, HABC will offer a leasing incentive equal to 1 month of TTP or a gift card for household essentials up to \$100.
MTW Housing Choice Voucher	<p>HABC anticipates that there may be delays resulting from the uncertainty of the pandemic (the possibility of another shutdown) and the availability of units due to court delays on evictions. HABC has Leasing goals in place as well as housing search and tenant placement services with an outside consultant and will aggressively work to meet the goals as defined.</p> <p>Please note that Baltimore County is absorbing approximately 1,100 of HABC's vouchers over the course of 2022, where previously these vouchers were being administered and were part of HABC's utilized vouchers. This places an additional challenge to HABC in meeting utilization goals.</p> <p>HABC will be implementing a series of landlord incentives which are designed to increase landlord participation in the program. As more units become available for lease in HABC's jurisdiction, HABC anticipates that leasing and voucher utilization will increase. Additionally, HABC will be hiring additional leasing staff to reduce the time for RFTA processing which in turn will result in expedited leasing and greater utilization. Finally, with additional staffing HABC will be pulling greater numbers of families from the waiting list which will also positively impact utilization.</p>
BRHP	No leasing issues are anticipated

## C. Waiting List Information

i. **Waiting List Information Anticipated**

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

**Table 9: Waiting List Information Anticipated**

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Public Housing	Community Wide	3,088	Closed	Yes
Federal Public Housing-Mixed Population	RAD Waiting List	12,522	Closed	Yes
Federal MTW Housing Choice Voucher Units: Tenant-Based	Community Wide	14,819	Closed	Dependent upon results of WL purge
Federal MTW Housing Choice Voucher Units: Project-Based	Site-Based	6,768	Closed	No
RAD Choice Mobility	Program Specific	266	Open	Remains open year-round
Thompson Vouchers *	Program Specific	14,922	Closed	No

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

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

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

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

Waiting List Name	Description of Planned Changes to the Waiting List
MTW Housing Choice Voucher Waiting List	<p>HABC plans to purge the waiting list in 2022 to ensure that existing applicants remain interested in applying for assistance and to ensure that contact information is up to date. As is often the case with waiting list purges, the result is a reduction in the number of applicants on the waiting list. In order to have enough applicants for available vouchers over the next 12 to 18 months, HABC may open the waiting list.</p> <p>HCVP opened the Project-Based Senior Waiting List on October 5, 2020 accepting online preliminary applications only. HABC plans to close this waiting list effective December 31, 2021.</p>



Waiting List Name	Description of Planned Changes to the Waiting List
MTW Public Housing Waiting List	<p>HABC shall open the Public Housing waiting list (based on unit size) for the period needed to cover projected turnover for the next five years.</p> <p>HABC plans to implement the Centrally Administered Location Based Waiting list to all Public Housing applicants utilizing the My Housing Portal in Emphasys. The applicants will be able to make their Location Based Waiting List selection utilizing the online Applicant Portal system. Location Based Waiting Lists will not apply to Bailey units.</p>
RAD Choice Mobility Waiting List	In FY 2022, HCVP anticipates setting aside 1/3 of its turnover vouchers for the Choice Mobility option. The number of vouchers issued for FY 2022 is dependent on FY 2021 attrition.
Thompson Vouchers	BRHP has drafted policies for the FY 22 Administrative Plan enabling us to undertake an update of the waiting list, as well policies for removal from the waiting list for non-respondents to update requests.

### III. Proposed MTW Activities:

This section of the MTW Annual Plan provides information on new MTW activities proposed for FY 2022. HABC's numbering format includes the year the activity was proposed and a number which starts each year at "1" with successive MTW activities in the same year following as 2, 3, and so on.

#### Activity #2022-01: Student Housing Initiative

##### Description of MTW Activity

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

Initial eligibility for the SHI includes:

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

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

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

The SHI subsidy will operate as follows:

- SHI participants will pay the highest of 10% of gross monthly income, 30% of adjusted monthly income or a \$25 minimum rent and will have recertifications completed on a biennial basis during their participation in the program.
- In the event the gross rent exceeds the applicable 1- or 2-bedroom payment standard, the SHI participant will pay the difference; however, HABC will not approve a unit where the family share is greater than 40% of the family's adjusted monthly income.
- Generally, the voucher will be provided for up to four years for eligible, matriculated, full-time students in an accredited 4-year college program and up to five years for eligible, matriculated, full-time students in an accredited 5-year college program. Students enrolled in 4-year community colleges within HABC's jurisdiction are also eligible under this activity.
- An additional post-graduation year may be provided if the student remains income eligible and has not yet secured permanent full-time employment. HABC will terminate the subsidy during fifth year within sixty (60) days of securing full-time employment. Participants will be required to notify HABC within 30 days of securing full-time employment.
- Where a student becomes part of the SHI program after they have already completed course work at a Baltimore City college/university, HABC will adjust the participation period in the program to reflect the remaining portion of the applicable year cap.
- The family size must be consistent with the occupancy standards for a 1- to 2-bedroom unit without being over-crowded.
- HABC will conduct reasonable rent determinations prior to unit approval.
- HABC will provide utility allowances to students where the cost of utilities is not included in the rent.
- The subsidy will be limited to housing assistance, in the form of rent in privately owned housing and will be paid directly to the housing provider; however, where applicable, the subsidy may cover security deposit assistance up to one month's subsidy.
- HABC will conduct the HQS inspections.

- If the student is at \$0 HAP for 6 months, the subsidy will be terminated, and assistance will no longer be provided.
- Prior to terminating a participant's voucher, HABC will provide the participant with sixty day's written notice and offer the participant an opportunity for an informal hearing; where applicable.

Participants must continue to remain enrolled full-time and maintain a 2.5 Grade Point Average (GPA) in order to be eligible for subsidy renewal each year; however, this requirement is waived when an additional post-graduation year is authorized. Additionally, HABC will make available to SHI participants, self-sufficiency related services offered by HABC. Every student will be required to utilize academic support services and counseling services available at the college. If the student does not remain compliant with program terms, the subsidy may be terminated. The individuals issued SHI vouchers and served under this activity will become participants in the Housing Choice Voucher Program; however, their vouchers will have term limits. Upon HUD approval, HABC will accept referrals from the partner college/university for the 2022-2023 school year.

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

### **Statutory Objective**

This activity meets the statutory objective of giving incentives to families where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient. By subsidizing housing costs for college-enrolled students, the program will support low-income students in completing a college degree and better position students to obtain post-graduate employment.

### **Hardship**

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

## Implementation

Upon HUD approval, HABC will develop and execute MOUs with the partner colleges/universities. Additionally, program plans, policies and procedures will be developed along with a tracking mechanism to monitor outcomes. Selection of eligible recipients is anticipated for the 2022-2023 school year. HABC will no longer accept referrals once the SHI program cap has been met.

## Metrics

The metrics below will be compiled using HABC's housing software as well as data and reports from program partners.

<i>CE #4: Increase in Resources Leveraged</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0.00	TBD*		
<i>*Upon approval of this activity and identification of the participating colleges/universities, HABC will be able to determine the amount of leveraged funds.</i>				
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	10 households		
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	0 households		
<i>*Self-sufficiency is defined as graduation from college.</i>				

## Cost Implications

HABC anticipates spending approximately \$480,000 over the course of 4 years to support 10 households annually (assumes all are attending 4-year institutions) and that the average subsidy payment is \$1,000/month).

## Need/Justification for MTW Flexibility

Using the MTW Agreement Attachment C, Section D. 1. C., HABC is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. HABC will conduct biennial reexaminations for SHI participants. Additionally, under the MTW Agreement, Attachment C, Section D. 2. a, HABC is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance. Accordingly, HABC will provide security deposit assistance up to one month's rent for eligible SHI participants. Using the MTW Agreement Attachment C, Section D. 2. d., HABC is authorized to implement term limits for HCV units designated as part of the MTW demonstration. The SHI establishes term limits for SHI voucher holders through the completion of their four-year term plus an optional year for those who are not yet employed. Finally, using the MTW Agreement Attachment C, Section D. 4, HABC is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences. The SHI provides that local colleges and universities will identify and refer students who meet SHI criteria. The Student Housing Initiative program will provide eligible individuals with supports to remove barriers and complete post-secondary education necessary for meaningful employment and economic self-sufficiency.

### **Rent Reform/Term Limit Information**

The SHI activity is not a rent reform activity; however, the SHI voucher is a time-limited voucher. Accordingly, HABC has included the impact analysis section and provided impact information as applicable to the activity.

### **Impact Analysis**

- **Description of how the proposed activity will impact household rent/tenant share.**

The proposed activity is not a rent reform activity and as such will not have any disparate impact on household rent/tenant share. Income, rent, and subsidy will be calculated consistent with HABC's existing MTW rent simplification policies. Additionally, HABC will provide a subsidy up to one month's rent to cover the cost of a security deposit.

- **A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.**

The proposed activity is not a rent reform activity; however, HABC will separately monitor the vouchers issued to participants with SHI vouchers during their time-limited participation in the program. HABC will recertify participants on a biennial basis and will be in regular communication with each of the colleges/universities to monitor participant progress in

school and to ensure compliance with continued occupancy requirements. HABC does not anticipate any unintended consequences, as the maximum initial rent burden and minimum rent policies apply to participants with SHI vouchers.

- **A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.)**

The proposed activity is not a rent reform activity and as such will not have any disparate impact on the students who are awarded SHI vouchers.

- **A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted, terminated, reduced, continued and/or expanded.**

The SHI activity is not a rent reform activity; however, HABC will monitor the activity outcomes to determine the number and percent of SHI participants who successfully graduate from their programs. Additionally, HABC will monitor the number and percent of SHI participants who request and are approved for an additional program year after graduation to determine whether to modify the program to include as a standard, a post-graduation year. Finally, HABC will use program outcomes to determine if additional SHI vouchers will be allocated.

### **Hardship Case Criteria**

- **The MTW PHA must establish a hardship policy that clearly defines the circumstances under which households may be exempted or provided temporary relief from the activity. The MTW PHA must describe how such households could access the hardship policy and the associated process.**

The SHI activity is not a rent reform activity. HABC's minimum rent and related minimum rent hardship policies apply to participants with SHI vouchers. HABC has established a hardship policy concerning leaves from the program. Specifically, in the event that a student needs to take an extended leave from his or her academic program, the subsidy will be discontinued; however, the student may reapply to the SHI as long as the program continues to operate. For leaves which do not exceed two months in duration, and which have been reviewed and approved by HABC and partner college/university, the subsidy will continue. A copy of the hardship policy can be found in Appendix B.

### **Description of Annual Reevaluation**

- **The MTW PHA must provide an overview as to how the activity will be reevaluated on an annual basis in the Annual MTW Report, mitigating negative impacts and unintended consequences.**

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

#### **Transition Period**

- **The MTW PHA must develop a plan and timeline for transitioning households into the activity. If a rent reform activity, the MTW PHA should show how the impact analysis informed this transition period.**

Participants in the SHI activity will be new admissions referred to HABC by the colleges/universities with whom HABC has established an MOU. As this activity is not rent a reform activity and involves new admissions, there is no transition period involved.



## Activity #2022-02: Leasing Incentive Program

### Description of MTW Activity

Using its MTW flexibility, HABC will establish a Leasing Incentive Program (LIP) to promote utilization of vouchers and provide increased housing options and opportunities for voucher holders. Additionally, to further reduce the vacancy rates in underutilized/hard to house Public Housing (PH), the LIP will provide incentives to lease PH units in these areas/developments or portions thereof.

**HCV Leasing Incentive:** HABC will provide leasing incentives to owners to increase the number of units in Opportunity Neighborhoods, increase the number of new construction units, new leased units, accessible units and new owners on the program. HABC's Opportunity Neighborhoods are those sub-markets which have been identified in an HABC commissioned study and which reflect key indicators of neighborhood opportunity including, poverty rate, school quality index, crime, diversity, transportation access and labor market conditions, (See Appendix M: Map of Opportunity Neighborhoods). To support and encourage owner participation in the HCV program, the LIP will also provide vacancy and damage payments to owners payable under defined circumstances. HABC will cap the spending on this activity at \$750,000 (\$500,000 for leasing incentives and \$250,000 for damage/vacancy loss) in the first year of this activity. Pending the response to this activity; HABC may revise the program caps in future years.

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

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

- A \$500 one-time incentive for a newly constructed unit. “Newly constructed” refers to a unit in which construction was completed within the past twenty-four months. Where a new unit to the program is new construction, the owner will receive only the new construction incentive.
- The maximum incentive payment for any given unit is \$1,500.
- Incentive payments are payable upon execution of the HAP contract.
- Where a unit had previously been leased by an HCV participant and there is a gap in leasing with the HCV, program, HABC will not provide an incentive when and if the unit gets leased by a new HCV participant unless the gap is five or more years.
- Vacancy and Damage Loss Payments: Where vacancy and damage loss payments are concerned, they will be provided to new owners only. New owners will be considered as such for up to 12 months from the effective date of their first HAP contract with HABC. Vacancy and damage loss payments will no longer apply if the vacancy and damage occur beyond the first 12 months of occupancy.
  - Vacancy loss payments will be made available to new owners whose tenants vacate the unit without notice or HABC authorization, prior to the end of their lease term. To qualify for the vacancy loss payment, the unit owner must re-rent the unit to another HCV family within 60 days from the date that the owner notifies HABC of move-out. Owners will be paid only for the length of time the unit was vacant, with a maximum payment equivalent to the lowest of two months of HAP or \$3,000. In addition, HABC will only reimburse owners to the extent that the lost rent is not covered by the security deposit (after being applied to any damages). Finally, owners must demonstrate a good faith effort to re-rent the unit to another HCV family during the period of vacancy. Requests for vacancy claims must be submitted within 30 days of re-leasing of the unit.
    - *Example:* Tenant A vacated a unit without providing notice. Owner A demonstrated good faith efforts to re-rent the unit to another HCV family, but the unit remained vacant for 3 months. After accounting for damages, Owner A had \$400 remaining in security deposit funds. In this case, HABC would provide a vacancy loss payment equal to two months’ HAP, minus the security deposit held. If the monthly HAP payment was \$600, the vacancy loss payment would be  $(\$600 \times 2) - \$400 = \$800$ .
  - Damage loss payments: HABC will provide damage loss payments equivalent to the lowest of two months of HAP or \$3,000 for new owners to cover costs, beyond normal wear and tear, which are not covered by the security deposit, provided that the owner agrees to lease the unit to another HCV client within 60 days from the

date that the owner notifies HABC of the damages. HABC will not reimburse for tools needed to repair damages, landlord's personal time to repair damages or other activities related to the claim, items allegedly stolen, or damages not represented in a move-in/out condition report. Requests for damage claims must be submitted within 30 days of the tenant vacating the unit or owner re-taking possession. HABC will inspect the unit to validate the owner's damage claim.

**PH Leasing Incentive:** HABC will provide leasing incentives to applicants who agree to accept hard to lease units. A unit is considered hard to lease when the unit has been vacant for more than 45 days after being placed in a "ready to lease" status and there have been three prior unit refusals for the current vacancy. Where an applicant accepts a unit offer and signs the lease for a hard to lease unit, HABC will offer a rent credit equivalent to the calculated TTP or a gift card to a store/website that offers home goods and/or home improvement products with a value of \$100. Applicants may select which incentive they would like to receive.

### Statutory Objective

This activity meets the statutory objective of increase housing choices for low-income families.

### Implementation

Upon HUD approval, HABC will develop policies and procedures for the Leasing Incentive activity, including request and processing forms, outcome tracking tools and marketing materials. Implementation is anticipated late in FY 2022.

### Metrics

The metrics below will be compiled using HABC's housing software as well as other internal data and reports.

<i>HC #1: Additional Units of Housing Made Available *</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase)	0 units	HCV: 667 units PH: 75 units		
<i>*Metric is calculated using the planned total incentive payments of \$500,000 at an average of \$750 per incentive</i>				
<i>HC #3: Decrease in Wait List Time</i>				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease)	HCV: 8 years PH: 7 years	HCV: 7 years PH: 6.5 years		
<b>HC #5: Increase in Resident Mobility*</b>				
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	222 households		
<i>*Metric reflects incentives for households who leased new units in opportunity areas and/or units of new construction. This metric applies only to HCV</i>				

### Cost Implications

In the first year of this activity, for the HCV leasing incentives, HABC will cap the spending at approximately \$500,000. For the HCV vacancy/damage payments, HABC will cap annual spending at \$250,000. Where the Public Housing leasing incentives are concerned, HABC has budgeted \$16,275 to cover the cost of the incentives (75 units @ avg TTP of \$217). HABC has budgeted accordingly to cover these costs. Pending the response to this activity, HABC may increase the annual caps in future years.

### Need/Justification for MTW Flexibility

HCV Incentive: Using the MTW Agreement Attachment C, Section D. 1. D. provides that the agency is authorized to determine a damage claim and/or vacancy loss policy and payment policy for occupied units that differs from the policy requirements currently mandated in the 1937 Act and its implementing regulations. Both the additional subsidy provided in the way of leasing incentives and the damage and vacancy loss payments serve to increase the number of housing units available to low-income families.

PH Incentive: Using the MTW Agreement Attachment C, Section C. 6., HABC is authorized to develop and offer incentives that will attract applicant to developments, or portions thereof, which have been difficult to market. Use of this flexibility will assist HABC in lowering vacancy rates and increasing utilization of PH units while also providing much needed housing to low-income families.

### Rent Reform/Term Limit Information

Not applicable

## IV. Approved MTW Activities

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

### A. Implemented Activities

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

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

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

##### Description/Update

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

##### Triennial Recertification

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

##### Annual Recertification

- PH families reporting zero income or minimal income. Minimal income is defined as less than \$2,400 in household gross income annually.
- Residents living in Mod Rehab and Mod Rehab SRO units.
- Residents with other vouchers that do not qualify based on HUD funding restrictions.
- Residents with Homeownership vouchers.
- Residents with HUD Awarded Special vouchers (Veterans Affairs Supportive Housing (VASH)).

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

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

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

Additionally, HABC conducts annual recertifications for PH families reporting minimal income. Minimal income is defined as less than \$2,400 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.

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

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

HABC revised the minimal income amount from \$2,000 to \$2,400 annually.

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

- Existing metrics have been updated to reflect the anticipated outcomes in FY 2022.
- CE #1: Agency Cost Savings: HABC is removing the metric on agency cost savings as this is not an intended outcome of this activity. While there are time saving features inherent in the Streamlined Recertification activity, there are no actual staffing reductions; only repurposing of existing staff.

### **Metrics**

CE #2: Staff Time Savings				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	Biennial and Triennial			
	PH: 23,920 hours  HCV: 27,715 hours	PH: 7,715 hours  3,086 biennial and triennial recertifications completed X 2.5 hours/recert = 7,715 hours  HCV: 18,268 hours  7,307 biennial and triennial recertifications completed X 2.5 hours/recert = 18,268 hours		
	Limit on Interims			
	HCV interims: 3,231 Time per interim: 45 min. HCV time on interims: 2,423 hours	HCV: interims: 969 Time per interim: 45 min. HCV time spent on interims: 727 hours		
*Assumed 2/3 of the interims completed were for voluntary purposes, i.e. change in income and the remaining 1/3 were for required purposes.				

### Planned Significant Changes

No significant changes are planned.



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

**Plan Year Approved, Implemented, Amended**

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

**Description/Update**

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

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

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

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

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

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

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

HABC will define a PBV project as a single building, multiple contiguous or non-contiguous (scattered sites) buildings, or multiple buildings on contiguous or non-contiguous parcels of land all with a single owner. A single-family building is a building with no more than four dwelling units. Additionally, HABC may elect to combine units that cumulatively meet the definition of a PBV project, but that are covered under more than one Housing Assistance Payments (HAP) Contract, into a single HAP Contract. For such scattered site projects, HABC implements an alternative method to determine rent reasonableness whereby HABC bases the

rent reasonableness determination for all units in the project that are within the same submarket area on the rent reasonableness determination made for a single unit of each bedroom size. For example, the rent reasonableness determination for all one-bedroom units in the project will be based on the rent reasonableness determination made for a single one-bedroom unit in the project provided that the units are in the same submarket area.

As referenced in Activity 2020-04: Modified Rent Reasonableness and Rent Cap Policy, HABC will utilize the flexibility in this activity to determine rent reasonableness for PBV units and will also apply the flexibility to utilize payment standards up to 135% of FMR when determining initial and re-determined rents for PBV units located in opportunity areas. Finally, the flexibility in Activity 2020-04 regarding rent caps will also apply to rent increases for PBV units.

### Planned Changes to Metrics/Data Collection

- HC #4: Displacement Prevention and HC #5: Increase in Resident Mobility: HABC has redefined these metrics to reflect the total number of HABC and BRHP managed PBV units as this data more accurately reflects the effectiveness of this activity.

### Metrics

<i>HC #1: Additional Units of Housing Made Available *</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase)	Implemented in FY 2019	164 units		
<i>*Represents the number of new PBV planned in each fiscal year.</i>				
<i>HC #4: Displacement Prevention *</i>				
Unit of Measurement	Baseline **	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move	2,652 households	2,816 households		
<i>*Metric reflects the total number of HABC and BRHP managed and new PBV units.</i>				
<i>** Baseline reflects the existing number of HABC and BRHP managed PBV units as referenced in the FY 2022 Plan.</i>				
<i>HC #5: Increase in Resident Mobility*</i>				
Unit of Measurement	Baseline **	Benchmark	Outcome	Benchmark

				Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	2,652 households	2,816 households		
<i>*Metric reflects the total number of HABC and BRHP managed and new PBV units.</i> <i>**Baseline reflects the existing number of HABC and BRHP managed PBV units as referenced in the FY 2022 Plan.</i>				

### Planned Significant Changes

No significant changes are planned.

## Activity #2006-03: Thompson Biennial Recertifications

### Plan Year Approved, Implemented, Amended

Approved FY 2006 and implemented FY 2007.

### Description/Update

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics for CE #1 and CE #2 have been updated to reflect planned activity in FY 2022.

### Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved ?
Total cost of task in dollars (decrease)	\$23,350	\$85,530 2,000 Recerts 713 hrs./recert \$28.51/hr.		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved ?

Total time to complete the task in staff hours (decrease)	934 hours	3,000 hours 2,000 recerts 1.5 hrs./recert		
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved ?</b>
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%		

### Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

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

### Description/Update

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

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

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

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

- Complete an interim contract goal (other than education/vocation): \$100 (max \$200)
- Complete Career Development Boot Camp within the first year of program participation: \$100

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

#### Planned Non-Significant Changes

There are no non-significant changes planned for FY 2022.

#### Planned Changes to Metrics/Data Collection

HABC has updated the benchmarks for SS #3, SS #4 and SS #5 to reflect FY 2022 activity. HABC has also removed SS #6 as it only reflects the HCV portion of the FSS participants in the program and is not a comprehensive metric to show participant progress/achievement. Escrow, earned income and tenant rent to owner provide a snapshot of economic progress for all participants

#### Metrics

<i>SS #1: Increase in Household Income*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase)	\$13,908	\$14,227		
<i>*Baseline represents average earned income for households with earned income in FY 2019. Benchmark indicates an increase of 2.3% growth.</i>				
<i>SS #2: Increase in Household Savings*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of escrow of households affected by this policy in dollars (increase)	\$4,099	\$4,193		
<i>*Baseline reflects average escrow for households with escrow at the end of FY 2019.</i>				
<i>SS #3: Increase in Positive Outcomes in Employment Status*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	202	202 56%		
Employed PT or FT	164	158 44%		



Enrolled in Education	10	11 3%		
Enrolled in Job Training	30	29 8%		
<i>*Baseline reflects households enrolled in FSS during FY 2019.</i>				
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease)	34	32 9%		
<i>*Baseline represents FSS households receiving TANF benefits at the end of FY 2019.</i>				
<b>SS #5: Households Assisted by Services that Increase Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase)	0	360		
<i>*Baselines were established in FY 2020 report.</i>				
<b>SS #7: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline **</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total Household contributions towards housing assistance (increase)	\$280	\$280		
<i>*Represents Tenant Rent to Owner.</i>				
<i>**Baselines were established in FY 2020 report.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline**</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase)	0	17		
<i>*Self-sufficiency is defined as graduation from the FSS program.</i>				

### Planned Significant Changes

No significant changes are planned.

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

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

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

### **Description/Update**

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

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

Further, BRHP expanded the assistance to Mobility Program participants to include one-time incentive payments to landlords’ one-time apartment application fees and/or moving costs for families with a Thompson voucher, and ongoing counseling fees associated with the pre- and post-move counseling programs for the Mobility Program.

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

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

No non-significant changes are planned.

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

- CE #1 Agency Cost Savings – Payment Standards: BRHP is removing this metric as it does not relate to the activity goals and savings are not anticipated when setting payment standards which are consistent with area median and actual rents.
- CE #2 Staff Time Savings – Payment Standards: BRHP is eliminating this metric as it does not relate to the activity goals. Time savings are not anticipated when using the alternate method for setting payment standards.
- CE #5 Increase in Agency Rental Revenue – Payment Standards: BRHP is eliminating this metric as it does not relate to the activity goals. Using an alternate method to set payment standards was not put into place to increase agency rental revenue and does not have bearing on the outcomes of this activity.

## Metrics

<i>HC #5: Increase in Resident Mobility – Payment Standards &amp; Security Deposit</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Payment Standards: 0  Security Deposit Assistance: 300	Payment Standards: 525 families who move to exception PS areas  Security Deposit Assistance: 325		
<i>HC #7: Households Assisted by Services that Increase Housing Choice – Security Deposit</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	300	325 Security Deposit Assistance		

## Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

For the FY 2022 Plan, 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.

- 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 MTW Homeownership Program has evolved since initial approval and includes the following key program features:

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

### Special Homeownership Vouchers

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

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

*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 Allowances* – 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.

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

The decelerated assistance portion of the MTW Homeownership program, which was previously approved for HCV Homeownership Voucher holders, will also be available to participants with Special Homeownership Vouchers.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect the anticipated volume of homeownership transactions in FY 2022.

### Metrics

<i>HC #1: Additional Units of Housing Made Available</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% of AMI as a result of the activity (increase)	0	21		
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	21		
<i>HC #6: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase)	0	21		

### Planned Significant Changes

No significant changes are planned.

## Activity #2010-01: Unit Sizes

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

### Description/Update

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

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

- HABC is removing the following metrics. These metrics have been required by HUD; however, HABC does not consider these metrics applicable to this activity. HABC intended for this activity to save the Agency money and it has no influence on staff time, error rates or additional housing units made available. Finally, these metrics do not reflect on the effectiveness of the activity.
  - CE #2: Staff Time Savings
  - CE #3: Decrease in Error Rate of Task Execution
  - HC #1: Additional Units of Housing Made Available



## 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		
*Represents total HAP expenditures				

## Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

### Description/Update

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

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

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

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

By the end of FY 2021 there will be 292 LTA NED units, 14 of which will be added by the close of FY 2021: 4 at Greenmount and Chase, 7 at Somerset Extension, 1 at Flamingo Apartments and 2 at Light Street. Each of these units, upon completion, will provide much needed affordable units for persons with disabilities. HABC does not anticipate adding new units under this activity in FY 2022.

### Planned Non-Significant Changes

No non-significant changes are planned.

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

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

<i>HC #5: Increase in Resident Mobility</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit as a result of the activity (increase)	0 units	292		

#### **Planned Significant Changes**

No significant changes are planned.

## Activity #2010-03: Thompson Risk Based Inspections

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2010.

### Description/Update

Pursuant to HABC's MTW authority, units in the BRHP Program are 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 requires the owner and tenant family to certify that the repairs have been made. A random sample of units that have been approved under the self-certification option will receive a quality control inspection.

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect anticipated inspection volumes in FY 2022.

### 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		
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease)	1,869 hours	Inspections completed: 2,150  Staff time per inspection: 1.5  Total time savings Hours: 3,225		

#### Planned Significant Changes

No significant changes are planned.

## **Activity #2012-01: Rent Simplification – Thompson** *(Formerly Asset Income, Adjusted Income and FT Student Adoption Assistance Exclusion for Thompson Participants)*

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

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

### **Description/Update**

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

- **Modified Deductions:** The gross annual income is reduced using the standard deductions outlined below. There will be a standard deduction for working families, elderly families, disabled families and non-disabled families without wages. The deductions below replace all other regulatory deductions. The deductions are:
  - \$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 excludes all income from assets when the cash value of the asset is less than \$50,000. Additionally, for households where the cash value of the assets is less than \$50,000, BRHP allows self-certification of asset value and income.
- **Asset Income Calculation:** BRHP calculates asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings rate when the market/face value of the family's assets is in excess of \$50,000.

- BRHP calculates seasonal income using the past four quarters of income as reported by Enterprise Income Verification's (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment.
- BRHP's hardship policy is extended so that families may request the use of regulatory deductions and exclusions if adjusted income would be lower than adjusted income calculated using BRHP standard deductions. The request must be made within 14 calendar days of the notification of the change in family rent share. HABC will apply its financial hardship policies to households who demonstrate hardship due to application of these policies.

### Planned Non-Significant Changes

In FY 2022, HABC will exclude 100% of income received from HABC reviewed and approved guaranteed income programs which is paid to support financial stability and economic equality. This income is temporary and thus excluded.

### Planned Changes to Metrics/Data Collection

- CE #1: Agency Cost Savings: BRHP is removing the metric on agency cost savings as this is not an intended outcome of this activity. While there are time saving features inherent in the Rent Simplification activity, there are no actual staffing reductions; only repurposing of existing staff.
- CE #3: Decrease in Error Rate of Task Execution: HABC is removing this metric as HABC does not track error rates on assets, medical expenses and/or FT student income. As such, any error rate provided would not speak to the effectiveness of the simplification methods used in HABC's Rent Simplification activity.

### Metrics

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

	FT Student and Adoption Assistance Exclusion: 21 hours	FT Student and Adoption Assistance Exclusion: 0 hours		
<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total household contributions towards housing assistance (increase)	\$470	\$470		
<i>* Baseline and Benchmark first established in FY 2019. HABC uses average TTP for this metric.</i>				

### Planned Significant Changes

No significant changes are planned.



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

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

### Description/Update

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

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

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

HABC will continue to use the flexibility under this activity when entering into LTA-PB contracts; however, currently there are no plans to use this flexibility in FY 2022.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics have been updated to reflect the anticipated volume of activity in FY 2022.

### 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	0		

#### Planned Significant Changes

No significant changes are planned.

## Activity #2019-01: Rent Simplification

### Plan Year Approved, Implemented, Amended

Approved FY 2019; planned implementation end of 3<sup>rd</sup> quarter 2019, Amended FY 2020.

### Description/Update

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

- *Exclusion of all FT Student Earned Income* – Under Rent Simplification, HABC excludes all full-time student earned income for adult full-time students, other than the head of household, co-head and spouse. HABC will continue to apply a dependent deduction to adult full-time students. Additionally, as HABC is excluding 100% of earned income for adult full-time students, HABC will only verify full-time student status; however, HABC will not conduct verification of full-time student earned income.
- *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.
- *Medical Expense Calculation Method* – HABC calculates medical expenses for eligible participants using past paid, unreimbursed expenses in addition to prospective medical insurance premiums. Over the counter medications will not qualify for a deduction unless accompanied by a prescription and paid receipts. This change will alleviate the need to try to determine anticipated medical procedures and expenses, which cannot be accurately forecasted; however, there is no change to the amount and type of medical expenses which can be deducted.

- *Seasonal Income Calculation Method* – HABC calculates seasonal income using the past four quarters of income as reported by the Enterprise Income Verification's (EIV) Income Report, tax returns or other applicable third-party methods of verification. Income may also include off-season employment and/or unemployment; and
- *Payment Standards*: HABC's payment standards policy allows HABC to apply payment standards outside of the regulatory range to support leasing in revitalized areas and opportunity neighborhoods. As such, 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. This change greatly reduces the administrative burden and error rates in the application of payment standards when and if there is a decrease in payment standards. HABC will review hardships on a case-by-case basis when and if the application of the current payment standard results in a rent increase of more than 6%.

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

In FY 2022, HABC will exclude 100% of income received from HABC reviewed and approved guaranteed income programs which is paid to support financial stability and economic equality. This income is temporary and thus excluded.

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

- **CE #1: Agency Cost Savings**: HABC is removing the metric on agency cost savings as this is not an intended outcome of this activity. While there are time saving features inherent in the Rent Simplification activity, there are no actual staffing reductions; only repurposing of existing staff.
- **CE #2: Staff Time Savings**: HABC is simplifying this metric by determining the number of households with adult FT students and households with assets and applying the updated time metric after implementation.
- **CE #3: Decrease in Error Rate of Task Execution**: HABC is removing this metric as HABC does not track error rates on assets, medical expenses and/or FT student income. As such, any error rate provided would not speak to the effectiveness of the simplification methods used in HABC's Rent Simplification activity.

### **Metrics**

***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)	<p>Number of Adult FT Students with Earned Income &amp; Households with Assets: 1,563</p> <p>Time per FT Student and Household with Assets – Verification &amp; Calculation: .5 hours</p> <p>Total Time Spent on Activity Prior to Implementation 781.5 hours</p>	<p>Number of Adult FT Students with Earned Income &amp; Households with Assets: 1,563</p> <p>Time per FT Student and Household with Assets – Verification &amp; Calculation: .25 hours</p> <p>Total Time Spent on Activity after implementation 391 hours</p>		

#### Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved FY 2019; implemented FY 2020.

### Description/Update

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

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

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

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Metrics were updated to reflect the anticipated outcomes for FY 2022.

## Metrics

<b>HC #7: Households Assisted by Services that Increase Housing Choice*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase)	478	525		
<i>*Represents Thompson units only. Leased Housing families are not part of Mobility program services but are able to access the 50% percentile FMR.</i>				
<b>HC #5: Increase in Resident Mobility*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	664	460		
<i>*Represents Thompson units only. Leased Housing families are not part of Mobility program services, but are able to access the 50% percentile FMR</i>				

## Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2021.

### Description/Update

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

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



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

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

- CE #3: Decrease in Error Rate of Task Execution: HABC is removing this metric. This metric was required by HUD; however, a reduction in error rates was never an intended outcome and does not speak to the effectiveness of this activity.

### Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	<p>Number of first initial inspection fails + second annual fails: 6,069</p> <p>Total first inspection time: 6,069 * 1.65 hours per inspection = 10,014 hours</p> <p>Total first inspection costs: 10,014 * \$19.70 = \$197,276</p>	<p>Number of first inspection fails: 5,462</p> <p>Total first inspection time: 5,462 * 1.65 hours per inspection = 9,012 hours</p> <p>Total first inspection costs: 9,012 * \$19.70 = \$177,536</p>		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?

Total time to complete the task in staff hours (decrease)	Number of first initial inspection fails + second annual fails: 6,069  Total first inspection time: 6,069 * 1.65 hours per inspection = 10,014 hours	Number of first inspection fails: 5,462  Total first inspection time: 5,462 * 1.65 hours per inspection = 9,012 hours		
*HABC anticipates that implementation of a reinspection fee may result in a reduction in the number of re-inspections.				

### Planned Significant Changes

No significant changes are planned.

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

### Plan Year Approved, Implemented, Amended

Approved FY 2020; implementation planned for FY 2022.

### Description/Update

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 150 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.

In FY 2022 HABC, in concert with its program partners, will begin implementation of the HOP program, including providing mobility counseling and supportive services.

### Planned Non-Significant Changes

No non-significant changes are planned.

#### Planned Changes to Metrics/Data Collection

- HC #1: Additional Units of Housing Made Available: HABC is removing this metric. HABC does not believe it is applicable in the context of this MTW activity, as the program does not include developing new affordable housing.

#### Metrics

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	50		
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	0	50		

#### Planned Significant Changes

No significant changes are planned

## Activity #2020-03: Local Forms

### Plan Year Approved, Implemented, Amended

Approved FY 2020; implemented FY 2021

### Description/Update

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.

### Planned Non-Significant Changes

No non-significant changes are planned

### Planned Changes to Metrics/Data Collection

- CE #1: Agency Cost Savings: HABC is removing the metric on agency cost savings as this is not an intended outcome of this activity. While there are time saving features inherent in the development of local forms, there are no actual staffing reductions; only repurposing of existing staff, where applicable.
- CE #2: Staff Time Savings: It is difficult to determine time savings from development of different local forms. HABC will use the number of participants in the program and use an average savings of .25 hours per participant to provide a general impact on development of local forms.

## Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	7,307 hours .5 hours per form x 14,613 HCV participants	3,653 hours .25 hours per form x 14,613 participants		

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

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

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

### **Description/Update**

HABC utilizes a modified rent reasonableness policy to better reflect market conditions and streamline the process for determining reasonable rent. HABC engaged an independent consultant to conduct a housing market analysis which will be updated every two years as needed. 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;
- Included collection of data on verified rents for unassisted units, by bedroom size, for each identified submarket; and,
- Established rent ranges based on data collected, which include a low rent, high rent and average rent by bedroom size by the identified submarket.

Currently, HABC utilizes the rent ranges, by submarket and by bedroom size, to determine rent reasonableness for new contract units. Additionally, depending on the applicable rent ranges in opportunity submarkets, HABC may increase the payment standards for opportunity submarkets to an amount no greater than 135% of FMR; however, this anticipated ceiling may be adjusted from time to time to reflect market rents in the opportunity areas. At that time, HABC will amend the activity for HUD approval prior to implementing a payment standard if higher than 135%. The rent range by sub-market and ability to apply payment standards up to 135% of FMR applies to units leased in the Tenant-Based and Project-Based programs. HABC may also apply payment standard caps when and if funding restrictions arise.

Under this activity HABC has placed up to a 2.5% cap on contract rent increases for assisted Tenant-Based and Project-Based units. At contract renewal, HABC may limit the landlord's requested rent to the lower of 102.5% of the previous contract rent for the same tenant or the applicable payment standard provided the resulting rent is reasonable.



In FY 2022, HABC plans to utilize the rent range by sub-market area to determine rent reasonableness for all rent re-determinations. Until which time HABC utilizes the rent ranges for all reasonable rent determinations, HABC will conduct reasonable rent (RR) determinations on a random sample of the units where rent increases are requested. HABC conducts these RR determinations using the regulatory reasonable rent methodology; however, HABC will use the SEMAP sample size requirements to dictate the number of RR determinations to be completed. HABC will use the number of units with requested rent increases as the universe with which to develop the sample. If the approved rent on more than 20% of sampled units, because of application of the policy, is not reasonable when compared with the RR determination, HABC will conduct RR determinations on double the initially established sample size. HABC will monitor outcomes and may modify this policy to ensure rents are reasonable and to ensure that the rent change ceiling is consistent with current market conditions and available funding, i.e. revise sample size requirements or increase the rent increase ceiling.

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

In FY 2022, HABC will begin to use the rent ranges by sub-market area to determine rent reasonableness for all rent re-determinations. When this change is implemented, HABC will no longer conduct RR determinations using the regulatory RR rent methodology. Use of the rent range by sub-market method for determining RR will apply to Tenant-Based and Project-Based units. No additional waivers are required for this change.

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

- **CE #1: Agency Cost Savings:** HABC is removing this metric. While conducting RR will take less staff time, it will not result in cost savings as staff time will be re-purposed. Positions will not be eliminated. Cost savings do not accurately reflect the intended outcome of this activity.
- **CE #3: Decrease in Error Rate of Task Execution:** HABC is removing this metric. The overall objective of this activity is to streamline the process for reasonable rent determinations. Decreasing error rates is not an intended outcome of this activity and does not reflect on the effectiveness of the activity goals.

### **Metrics**

<i><b>CE #2: Staff Time Savings</b></i>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours	Time to determine rent reasonableness:	Time to determine rent reasonableness:		

(decrease)	.5	.25		
	Number of rent requests, new admissions and moves: 3,749*	Number of rent requests, new admissions and moves: 3,749*		
	Total Time: 1,875	Total Time: 937		
<i>*FY 2018 data was used to establish the baseline and benchmark.</i>				

### Planned Significant Changes

No significant changes are planned

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

### Plan Year Approved, Implemented, Amended

Approved FY 2020 and implemented FY 2020.

### Description/Update

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

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

Subsequent to HUD approval of the development proposal, HABC discovered that the acquisition and rehabilitation costs will likely exceed the proposed costs set forth in the initial budget and, in some cases, will likely exceed the HUD TDC.

In 2019 the 1 BR TDC in Baltimore was approximately 33% higher than HUD’s 1 BR TDC limit and depending on real estate trends, construction materials and other rehab costs the gap between HUD’s TDC limit and HABC’s TDC may increase.

Through 2021, HABC will have acquired two of the ten Bailey units. The current real estate market has made successful acquisitions even more difficult as purchasers are offering above asking and often, above appraised values. In FY 2022, HABC anticipates that three additional units may be acquired under this activity.

### Planned Non-Significant Changes

Real estate cycles are highly nuanced and consist of four different cycles: recovery, expansion, hyper supply, and recession phases. Baltimore is currently in the expansion stage with

continued demand for units and resulting higher prices, and sellers demanding, and receiving contract terms that are extremely unfavorable to buyers.

### Price

As reported by the Baltimore Sun on real estate in the Baltimore area, “The trends reflect the public health crisis’ continued hold on the economy, fueling demand for property and opening the consumer floodgates with record-low mortgage interest rates.” The median sales price in Baltimore City for the first quarter of 2021 was up 13.9% from a year earlier. The city currently has one month worth of housing inventory available; this is a decline of 1.45%. With such a small reserve of houses, those investing in the Baltimore market are often in bidding wars.

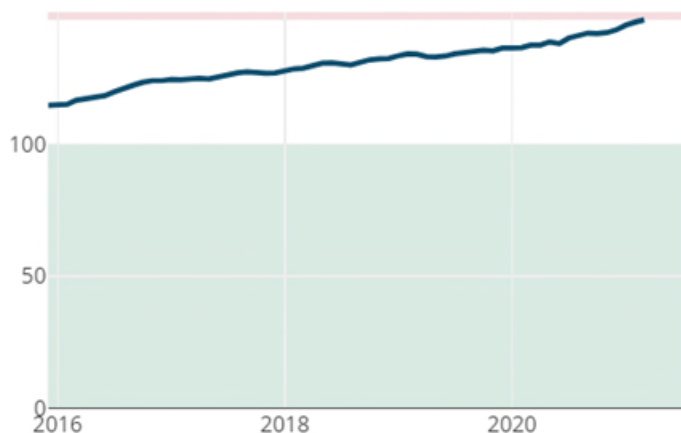
(<https://link.edgepilot.com/s/ec4d8af1/np4Eemwg5kuPCWkOi7LakQ?u=https://www.fool.com/millionacres/market/maryland/baltimore/>).

### Construction Costs

Construction costs rose 7% from the previous year and, per the chart below have been on a course of steady increase over the past five years; another factor which has impacted the TDC for the Bailey units.

#### Construction Costs ⓘ

**147.0** +7.0% YoY



### Contract Terms

Contract Terms in this current market are highly unfavorable for buyers. The terms include shorter closing durations, elimination of inspection contingencies and reduction of

timeframes within which a buyer has the right to terminate. Due to the rules that govern these highly regulated units, HABC is unable to meet these terms. HABC needs adequate time to perform a multitude of HUD required studies, time to work through HUD to close, and rights to terminate given there are so many more requirements that could render the units unacceptable for placing in service. At least five units for which HABC was seeking HUD approval went under contract prior to HUD review and approval.

Having the ability to offer a higher purchase price in exchange for terms that HABC needs will allow for customary HUD review and execution time frames to be preserved, proper studies to be performed, and the ability to protect HUD's money by not having to commit to purchases it cannot place in service.

#### Total Development Cost

Unlike the Hollander Ridge acquisitions, which were bundled and sold to a developer, HABC intends to purchase, rehabilitate, own, and operate these units. To that end, HABC has to execute development tasks that it has not had to execute previously, and these costs were not contemplated in the current TDC. These unaccounted-for costs include, but are not limited to, architectural design, permitting fees, construction management oversight, and construction. As the developer of these units, another material cost risk that HABC now has to manage is the rising and unpredictable construction market cost, which is magnified as a percentage cost on small projects such as these scattered site units.

#### Increase in Purchase Price Ceiling & TDC

In response to the current market conditions stated above, and to enable HABC to place in service the units required to meet HABC's Bailey Consent Decree, HABC is proposing the changes outlined below for the remaining Bailey one-bedroom units covered under this activity. No additional MTW waivers are required:

1. Allow HABC to pay over the appraised amount by up to 10% in order to compete with buyers who are able to meet seller's contractual term requirements at lower amounts. This waiver would authorize HABC to pay over appraised value without having to seek HUD approval for each transaction.
2. Increase the TDC limit for the Bailey units up to 50% over HUD's current approved TDC limit of \$247,035. HABC's current ceiling is 33% over HUD's TDC limit.

HABC proposes to use these additional flexibilities only in response to market conditions. When supply and demand and construction costs level out, HABC acquisition and development costs will decrease accordingly as will the need for the cost flexibilities inherent in this activity.

#### Planned Changes to Metrics/Data Collection

HABC has updated the total number of new housing units made available under this activity to reflect anticipated total outcomes through FY 2022.

#### Metrics

<i>HC #1: Additional Units of Housing Made Available</i>				
<i>Unit of Measurement</i>	<i>Baseline</i>	<i>Benchmark</i>	<i>Outcome</i>	<i>Benchmark Achieved?</i>
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase)	0	3		
<i>HC #5: Increase in Resident Mobility</i>				
<i>Unit of Measurement</i>	<i>Baseline</i>	<i>Benchmark</i>	<i>Outcome</i>	<i>Benchmark Achieved?</i>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	3		

#### Planned Significant Changes

No significant changes are planned.

## Activity #2021-01: Emergency Waivers

### Plan Year Approved, Implemented, Amended

Approved FY 2021 and implemented FY 2021.

### Description/Update

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

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

The next scheduled biennial reexam would take place in July 2023. This waiver applies to the PH and HCV programs.

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



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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

- HABC proposes removing the two metrics below as they are not intended outcomes of this activity. During periods of emergency, HABC does not seek out nor focus on cost and time savings; even though certain agency functions may be delayed or regulations waived.
  - CE #1: Agency Cost Savings
  - CE #2: Agency Time Saving

- HC #4: Displacement Prevention: HABC is adding this metric as the changes which are inherent in the Emergency Waivers activity are designed to streamline operations and reduce administrative burdens on participants and applicants, thus reducing the number who may have been displaced/terminated due to their failure to comply with regular operating requirements.

## Metrics

<i>HC #4 Displacement Prevention</i>				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease)	0	24,538		
<i>*The benchmark represents the number of assisted households during the period of declared emergencies who are effectively protected from displacement</i>				

## Planned Significant Changes

No significant changes are planned.

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

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

Approved FY 2021 and implemented FY 2021

### **Description/Update**

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

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

BRHP is in the process of developing the program documents and 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 in the fourth quarter of 2021 and continue enrollment through 2022.

The general parameters for incentive payments are as follows:

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

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

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

- SS #3 Increase in Positive Outcome of Employment Status: HABC combined the sub-metric at SS #3 to reflect employment as opposed to separate tracking of full time and part time employment which is not undertaken. Additionally, HABC has combined the sub-metric at SS #3 to reflect education/job training as one metric since they are tracked together.
- CE #6 and SS # 6 Reducing Per Unit Subsidy Cost: BRHP is removing both of these metrics as they do not reflect on the outcomes of this activity. Subsidy is not wholly dependent on earned income and can fluctuate for reasons such as higher rents and changes in family composition.
- HC #3 Decrease in Wait List Time and HC #5 Increase in Resident Mobility: BRHP is removing both of these metrics. Decrease in wait list time is not a goal for this program nor is resident mobility.
- Benchmarks have been updated to reflect anticipated program activity in FY 2022.

## Metrics

<i>SS #1: Increase in Household Income</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase)	\$0	\$16,806		
<i>SS #2: Increase in Household Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy in dollars (increase)	\$0	\$300		
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed	0	TBD at Program Launch		
Unemployed	0	TBD at Program Launch		
Enrolled in Education or Job Training Program	0	TBD at Program Launch		
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	125		
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase)	0	50		
<i>*Transitioned to self-sufficiency is defined as successful graduation from the program.</i>				

### **Planned Significant Changes**

No significant changes are planned.

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

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

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

There are no approved activities on hold.

## D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that HABC has completed, discontinued, or determined do not require MTW authority to implement. HABC will report on any additional activities, which have been closed out in the FY 2021 MTW Report.

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

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



Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
HAP Contract Modifications (Activity #2009-05)	Approved: FY 2009  Implemented: FY 2010	FY 2019	Using MTW authority, HABC will allow for floating units instead of identifying specific units in the HAP contract in the Project-Based Voucher program. This previously HUD approved activity was closed out and combined with other previously HUD approved Project- Based Program activities. The combined activity is now called the Enhanced Project-Based Voucher Program (Activity #2006-02).
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.
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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			funds would also be available. The direct purchase second mortgage program was targeted to applicants with incomes of no less than \$18,000 per year. Participants in this initiative would not receive a Section 8 homeownership voucher. A soft second mortgage of HOME VI funds was to be made available through this program. The activity was closed out due to lack of participation.
Rent Policy (Activity #2012-03)	FY 2012	FY 2015	HABC received HUD approval in FY 2012 to implement an Agency-wide rent policy adopted for Gilmor Homes; however, due to lack of funding and the on-going revisions of the Gilmor Homes rent policies, this activity was placed on hold in FY 2014. This activity was identical to the Gilmor Homes Demonstration Program and was implemented at the remaining HABC sites. A shortage of funds to provide employment counseling forced the closure of this program in FY 2015.
Adjusted Income for Thompson Participants (Activity #2012-04)	FY 2012	FY 2019	<p>Pursuant to HABC's MTW authority, for participants in the Baltimore Housing Mobility Program, gross annual income was reduced using standard deductions. This activity was approved and implemented in FY 2012.</p> <p>There is a standard deduction for working families, disabled families and non-disabled families without wages. The deductions replace all other regulatory deductions. The deductions are:</p> <ul style="list-style-type: none"> <li>• \$3,200 for households with wages</li> <li>• \$1,200 for households without wages</li> <li>• \$400 for any elderly or disabled family (to be combined with either of the above deductions)</li> </ul> <p>This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now call Rent Simplification – Thompson (Activity #2012-01).</p>
Adoption of New Investment Policies for HABC (Activity #2013-01)	Approved: FY 2013  Not Implemented	FY 2015	In FY 2013, HABC proposed adopting new investment policies, thereby increasing investment revenue and decreasing the federal expenditures necessary to carry out the federal program. For example, if the investment revenue is increased by \$100,000 due to a more favorable investment rate of return, this increased revenue can be used to offset the OPEB liability. HABC decided not to implement this activity due to the terms of a General Depository Agreement with the State. This activity was never implemented.

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Journey Home (Activity #2013-02)	FY 2013	FY 2017	Under this activity, HABC exercised its MTW fund flexibility in order to use MTW Block Grant Funds as housing subsidy for participants in the Journey Home Program. The Journey Home Program was closed in FY 2016 and the activity was closed out in FY 2017.
Exclude Income from Full-Time Students and Adopted Household Members (Activity #2014-02)	FY 2014	FY 2019	Using MTW authority, HABC modified the definition of annual income by excluding FT student earned income and adoption assistance income for families living in Thompson units. These exclusions were part of an effort to support economic self-sufficiency as well as to streamline program administration. As 100% of the income from these two sources is excluded, third party verification of income is not required. This activity was approved and implemented in FY 2014. This activity was closed out in FY 2019 and combined with other previously HUD approved rent simplification activities for the Thompson units. The combined activity is now called Rent Simplification – Thompson (Activity #2012- 01).
Encouraging Leasing in Higher Opportunity Neighborhoods (Activity #2015-01)	Approved: FY 2015  Not Implemented	FY 2016	Using its MTW authority, the Baltimore Regional Mobility Program required families to select units that are consistent with and not larger than the dwelling unit size listed on their voucher. This policy applied to new admissions as well as to participating households who requested program moves. HABC, on a case-by-case basis, made exceptions to this policy as a reasonable accommodation. This MTW activity was planned for implementation in FY 2015. However, upon further consideration, BRHP decided not to implement this activity and it was closed out in FY 2016.
Energy Conservation Utility Allowance (Activity #2015-02)	FY 2015	FY 2016	HABC provides a Utility Allowance to households responsible for payment of utilities for water, electricity, gas, other heating, cooking fuels and sewage services. In an effort to reinforce energy conservation activities and reduce the cost of water/sewage utility allowances, HABC will encourage the completion of a water audit and use of low-flow toilets by HCV tenants and landlords/owners. This MTW activity was placed on hold due to comments from the public and closed out in FY 2016.
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.
Sponsor-Based Project-Based Transitional Housing (Activity # #2017-01)	FY 2017	FY 2021	HABC partnered with the Women’s Housing Coalition to provide permanent housing for up to 25 homeless, hard-to-house families. A HAP Contract has been signed for up to 15 years with the option to renew; all families are housed and receiving supportive services allowing this activity to be closed out.
Landlord Payment Methods and Electronic Communication (Activity #2018-01)	FY 2018	FY 2020	HABC has moved to 100% online communication; this activity was originally developed to encourage enrollment in online communications or be charged a fee for paper communications. Almost 100% of owners are enrolled in direct deposit and receiving electronic communications; therefore, this activity is not cost effective and can be closed out.

## V. Planned Application of MTW Funds

This section of the Annual Plan describes HABC's estimated sources and uses of MTW Block Grant funds. This financial plan is compiled based on current information and is subject to revision as conditions and/or assumptions change. HABC has included, as Appendix C, the Estimated Sources and Uses of Non-MTW Funds for FY 2022.

### A. Estimated Sources and Uses of MTW Funds in FY 2022

#### i. Estimated Sources of MTW Funds

Table 11: Estimated Sources of MTW Funding for FY 2022

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$18,263,723
70600	HUD PHA Operating Grants	\$355,694,065
70610	Capital Grants	\$18,975,236
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	-
71100+72000	Interest Income	\$127,646
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	\$781,714
<b>70000</b>	<b>Total Revenue</b>	<b>\$393,842,384</b>

#### Notes to Sources:

- Tenant Revenue is planned at a 97% occupancy rate. Total Tenant Revenue also includes estimated income billable from various tenant transactions such as warrant, court and maintenance costs anticipated during CY 2022.
- HABC's Total Operating Grants of \$355,694,065 from HUD include the following funding estimates:
  - Section 8 HCV Housing Assistance Payments (HAP) subsidies in the amount of \$163,257,442 for Regular HABC Vouchers, including Port ins plus \$84,206,123 for Thompson Partial Consent Decree and Remedial Vouchers and \$25 million in MTW/HAP funds;

- Ongoing Administrative Fee Earned in the amount of \$15,868,811 (\$12,446,022 for Regular HABC Vouchers, \$3,422,789 for Partial Consent Decree and Remedial Vouchers); and,
- Public Housing Subsidies of \$67,361,689 is budgeted based on an estimated 95% funding proration for the calendar year ending December 31, 2022.
- Capital Grants funding of \$18,975,236 is based on planned capital improvement and construction activities as described in the Capital Improvement Plan.
- HABC does not report Fee Revenue as HABC has adopted a Local Asset Management Plan since FY 2010.
- Other Income is related to vending machines, excess utilities, and tenant charges from the Public Housing Program. It also includes Fraud Recovery for the recovery of funds from the Section 8 HCV program and reimbursements from Baltimore Affordable Housing Development.

ii. **Estimated Application of MTW Funds**

**Table 12: Estimated Application of MTW Funding for FY 2022**

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$41,224,485
91300+91310+92000	Management Fee Expense	\$12,600
91810	Allocated Overhead	\$(482,529)
92500 (92100+92200+92300+92400)	Total Tenant Services	\$2,340,479
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$15,757,134
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$36,150,466
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,021,158
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$2,447,291
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$14,697,098
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$2,166,729
97100+97200	Total Extraordinary Maintenance	\$600,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$245,063,565

FDS Line Item Number	FDS Line Item Name	Dollar Amount
97400	Depreciation Expense	\$19,998,092
97500+97600+97700+97800	All Other Expenses	-
<b>90000</b>	<b>Total Expenses</b>	<b>\$380,996,568</b>

#### Notes to Uses:

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

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

- Protective Services includes outside security contracts for the developments.
- Insurance Premiums are budgeted for properties, general liability, worker's compensation, automobiles, commercial crime, EDP data and media, boiler and machinery for the MTW activities.
- Other General Expenses include compensated absences, collection losses for uncollected rent and Payment in Lieu of Taxes (PILOT) and use of MTW/HAP funds.
- Interest Expense is budgeted for interest associated with the EPC Debt Service.
- Extraordinary Maintenance is planned for the unforeseen breakdown of heating systems, boilers, chillers, etc. This line also includes Casualty Loss, which is estimated for unforeseen repairs and losses at public housing units that are not covered by insurance carriers.
- HAPs include rent subsidies paid to landlords and utility assistance paid to tenants under the Section 8 HCV program. The Plaintiffs of the Thompson Consent Decree have created the nonprofit corporation, BRHP, to serve as Administrator beginning January 2013 and therefore, the HAP amount for Thompson consent decree and remedial vouchers in CY 2022 is reported as a pass-through from HABC to BRHP.
- Depreciation Expense is estimated for the costs of tangible fixed assets allocated over their useful lives. Depreciation expense is based on HABC's fixed asset records and depreciation methods.



Total Expenses	380,996,568
Less: Depreciation Expense	(19,998,092)
Capital Hard Cost	32,843,908
MTW Uses of Funds	393,842,384

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

### iii. Description of Planned 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.

The following activities will take place in FY 2022 using the single fund flexibility concept:

- HABC plans to use the unutilized prior year's HCV HAP reserves to fund up to \$17M of construction, acquisition, and rehab activities in support of HABCs strategic plan goals.
- HABC will use these same funds, up to \$8 million, for renovation and rehabilitation of vacant units and/or modernization activities using the single fund flexibility provisions.
- HABC may use up to \$5 million of its own LIPH/MTW operating reserves to fund critical operating or capital needs in excess of its requested year funding.

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

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

Original Funding Source	Beginning of FY – Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$ 68,755,339	\$ 25,000,000
HCV Admin Fee	\$ 26,379,917	\$2,000,000
PH Operating Subsidy	\$ 12,915,907	\$5,000,000
<b>TOTAL:</b>	<b>\$ 108,051,163</b>	<b>\$32,000,000</b>

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

*\*\* HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.*

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

Item No	Planned Use	Estimated Amount	Funding Source the Planned Use is Attributable to	Projected Time Line or Time Line Update
1.	Vacancy Renovations	\$8,000,000	HAP Reserves	1/1/22 – 12/31/22
2.	Development/Modernization Activities	\$17,000,000	HAP Reserves	1/1/22 – 12/31/22
3.	Unfunded Operating/Modernization work	\$5,000,000	MTW/Operating Reserves	1/1/22-12/31/22
4.	Additional HCV staff	\$625,000	HCV Admin Fee Reserves	1/1/22-12/31/22
5.	Office Upgrades	\$750,000	HCV Admin Fee Reserves	1/1/22-12/31/22
6.	Software improvements	\$625,000	HCV Admin Fee Reserves	1/1/22-12/31/22

### C. Local Asset Management Plan (LAMP)

i. *Is the MTW PHA allocating costs within statute?*

No

ii. *Is the MTW PHA implementing a local asset management plan (LAMP)?*

Yes

iii. *Has the MTW PHA provided a LAMP in the appendix?*

Yes

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

HUD has approved HABC's Local Asset Management Program as part of the Annual Plan submission since FY 2010. The proposed updated cost allocation calculations are included in Appendix D. The indirect cost rate for 2022 will be 14.30% for MTW and 10.77% for non-MTW.

### D. Rental Assistance Demonstration (RAD) Participation

i. **Description of RAD Participation**

Table 15 includes RAD conversions which have closed or are projected to close by the end of FY 2021. Table 16 includes RAD conversions which are slated for conversion in FY 2022 and beyond. Actual timetables for conversion and/or HABC's decision to proceed with conversion may vary from the information included below, depending on various factors including project feasibility determinations, project financing, timetables for HUD and other approvals and other factors. The timetable for RAD conversions extends beyond FY 2022 and continues to be refined in consultation with HUD and HABC's resident leadership. The listed projects may be modified in the future and are subject to approval by HUD and the HABC Board of Commissioners. HABC may apply for additional RAD conversions beyond those shown in Tables 15 and 16.

**Table 15: RAD Conversions Closed or Projected to Close by the End of FY 2021**

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

Property Name	No. of Units Converted to PBRA	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Hillside Park	30	PBRA	12/17	HUD approved the RAD Completion Certification.	12/1/17	6/29/18
Hollander Ridge	94	PBV	Qtr. 4 2021	All renovations completed and units leased in 2021	9/20/19	12/19/19
Hollins House	130	PBRA	11/15	Under review for HUD certification of completion	5/12/15	10/27/15
Lakeview Tower	302	PBRA	11/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
McCulloh Extension	347**	PBRA	11/16	Under review for HUD certification of completion	5/12/15	10/27/15
Primrose Place	125	PBRA	2/16	Under review for HUD certification of completion	5/12/15	10/27/15
Pleasant View Gardens Senior	110	PBRA	7/16	Submitted to HUD for certification of Completion	5/12/15	10/27/15
Pleasant View Gardens Townhomes	201	PBRA	9/16	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Senior Townes at the Terraces	47	PBRA	11/17	HUD approved the RAD Completion Certification.	10/26/16	01/26/17
Wyman House	168	PBRA	12/15	HUD approved the RAD Completion Certification.	5/12/15	10/27/15
Heritage Crossing	75	PBRA	11/18	HUD approved the RAD Completion Certification.	12/1/17	6/29/18
J. Van Story Branch Apts	350***	PBRA	11/18	Construction completed 12/2020	12/1/17	6/29/18
Monument East	170	PBRA	10/18	Completed February 2020.	12/1/17	6/29/18
Rosemont Tower	203	PBRA	9/19	Projected completion of rehab July 2021	12/1/17	6/29/18

Property Name	No. of Units Converted to PBRA	RAD Conversion Type	Dated Closed or Projected to Close	Major Milestone/Status	RAD Significant Amendment Submission Date*	RAD Significant Amendment Approval Date
Scattered Sites (Thompson 58/Broadway Homes)	58	PBRA	5/19	Construction completion: 10/2020	04/12/17	12/27/17
Somerset Court Extension	64	PBRA	9/19	Projected completion of rehab: September 2021	12/1/17	6/29/18
Somerset Homes/CNI Phase 2	100	40% RAD PBV 60% PBV	6/21	Project construction underway	9/20/19	12/19/19
Somerset Homes/CNI	36	Combination RAD PBV and PBV	Q4 2021 Estimate	Project on schedule to close in 2021	9/20/19	12/19/19
Perkins I RAD/CNI	48	PBV	Q4 2021 Estimate	Project on schedule to close in 2021		
<b>Total</b>	<b>4,029</b>					

*\*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.*

The table below identifies projects that are anticipated to be converted under RAD in FY 2022 and future years. Future RAD Significant Amendments will be prepared and submitted per HUD required timelines. Please note that subject to financing and final HUD approval, the RAD conversion type may change.

**Table 16: RAD Conversions Projected to Close in FY 2022 and Future Years**

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Albemarle Square	130	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion will not take place in 2022.
Arbor Oaks	62	RAD PBV or Blend of RAD PBV and PBV	Yes	HABC's development arm Baltimore Affordable Housing Development (BAHD) acquired property in July 2020.

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
				RAD conversion anticipated for 2 <sup>nd</sup> quarter 2022.
Carey House	23	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion may take place in 2022.
Dukeland	30	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion will not take place in 2022.
Laurens House	36	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion may take place in 2022.
McCulloh Homes	556	RAD PBV or Blend of RAD PBV and PBV	Yes	The overall concept plan for the site has been developed. RAD conversions will not take place in 2022.
Oswego Mall	35	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion will not take place in 2022.
Perkins Phase 2	76	RAD PBV or Blend of RAD PBV and PBV	Yes	Perkins Phase 2 submitted 9%/4% Twinning Application on 9/9/20; was awarded LIHTC and projected to close in 2Q 2022.
Perkins Phase 3	71	RAD PBV or Blend of RAD PBV and PBV	Yes	CHAP awards received
Perkins Phase 4	70	RAD PBV or Blend of RAD PBV and PBV	Yes	CHAP awards received
Perkins Phase 5	112	RAD PBV or Blend of RAD PBV and PBV	Yes	CHAP awards received
Poe Homes	288	RAD PBV or Blend of RAD PBV and PBV	Yes	Developer selected & MDA executed; Choice Neighborhood Transformation Plan submitted to HUD on 9/3/20; HUD approved the Poe Transformation Plan on January 5, 2021. HABC may submit a dispo/demo application and a Choice Neighborhood Implementation Grant application in 2022 and/or subsequent years.

Property Name	RAD Units	RAD Conversion Type	CHAP Received (Yes/No)	Major Milestones
Reservoir Hill 2	40	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion may take place in 2022.
Sharp Leadenhall	23	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion will not take place in 2022.
Shipley Hills	24	RAD PBV or Blend of RAD PBV and PBV	Yes	Developer selected. RAD conversion may take place in 2022.
Somerset Phase 4	89	RAD PBV or Blend of RAD PBV and PBV	Yes	CHAP awards received
The Rosemont Low Rise Townhomes	106	RAD PBV or Blend of RAD PBV and PBV	Yes	Developer selected. RAD conversion may take place in 2022.
Thompson 22	22	RAD PBV or Blend of RAD PBV and PBV	No	RAD conversion will not take place in 2022.
Townes at the Terraces	203	RAD PBV or Blend of RAD PBV and PBV	Yes	RAD conversion anticipated for 2 <sup>nd</sup> quarter 2022.
<b>TOTAL</b>	<b>1,996</b>			

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

No

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

Not applicable

## **VI. Administrative**

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

A Resolution approving the FY 2022 MTW Annual Plan and the MTW Plan Certifications of Compliance (Appendix E and Appendix F) will be attached once the Annual Plan has been adopted by the HABC Board of Commissioners at the (enter date) meeting, following the public review process and public hearing. HABC has also attached a Certification of Consistency with the Consolidated Plan (Appendix G).

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

HABC provided public notice of the FY 2022 MTW Annual Plan and posted the Plan on its website. A 30-day public comment period to allow for resident and general public review was provided from August 6, 2021 through September 6, 2021. A public hearing will be held and recorded via WebEx video conference on August 31, 2021 at 4PM. Thirty-Six (36) people participated in the video conference hearing. Prior to finalizing the Plan, HABC considered all comments received during the public review process. Documentation of the public process and comments received are included as Appendix H and Appendix I.

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

HABC will continue to monitor and evaluate MTW activities during FY 2022. At this point, HABC does not intend to use external evaluators for new or ongoing MTW initiatives. Internal reports will be generated on a periodic basis to assess performance against proposed targets. Quarterly internal reviews are conducted with program staff and management to review and evaluate results and, if necessary, to modify proposed strategies to improve results. Annual evaluation results will be reported as appropriate by HABC in the MTW Annual Report.

### **D. Lobbying Disclosures**

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



## Appendix A: Asset Management Table

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
<b>Conventional Housing</b>							
Brooklyn Homes MD002000021	482						
Cherry Hill Homes MD002000011	1281						
Douglass Homes MD002000005	387						
Gilmor Homes MD002000006	548	Redevelopmen t?	Possible modernization, rehabilitation with capital funds				
Latrobe Homes MD002000001	669	Redevelopmen t?	Possible modernization, rehabilitation with capital funds				
McCulloh Homes MD002000002	556		Possible modernization, rehabilitation with capital funds Possible RAD conversion or blended RAD conversion	Possible disposition/demo application planned redevelopment			

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
O'Donnell Heights MD002000009	230		Planning for Phase II redevelopment.	Possible disposition application of 6 single-family lots as part of Phase I redevelopment. Planning for redevelopment of Phase II, consisting of disposition of 27 acres.			
Poe Homes MD002000004	288		Planned redevelopment of Phase I. Possible RAD Conversion	Possible disposition/demo application as part of PoeHomes Transformation Plan.			
Westport MD002000022	252		Possible RAD Conversion	Possible disposition/demo application planned redevelopment			
<b>Scattered Sites</b>							
Scattered Sites 200 MD002000200	215 Family units		Continue rehab of viable vacant units, evaluate inventory as units become vacant	Demo/Disposition of nonviable scattered sites units determined via inspection.		Conversion of nonviable units into recreational space or for economic development purposes	Section 32 of Housing Act of 1937
Scattered Sites 201 MD002000201	194 Family units		Continue rehab of viable vacant units, evaluate	Demo/Disposition of nonviable scattered site		Conversion of nonviable units into	Section 32 of Housing Act of 1937

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
			inventory as units become vacant. Work with neighborhood developer on third party sales of excess properties for redevelopment purposes	units determined via inspection.		recreational space or for economic development purposes	
Scattered Sites 202 MD002000202	259 Family units	Intent to RAD 59 units as part of HABC's RAD III conversion	Continue rehab of viable vacant units, evaluate inventory as units become vacant	Demo/Disposition of nonviable scattered site units determined via inspection.		Conversion of nonviable units into recreational space or for economic development purposes	Section 32 of Housing Act of 1937
Scattered Sites 203 MD002000203	361 Family units	Intent to RAD 57 units as part of HABC's RAD III conversion	Continue rehab of viable vacant units, evaluate inventory as units become vacant	Demo/Disposition of nonviable scattered site units determined via inspection.		Conversion of nonviable units into recreational space or for economic development purposes	Section 32 of Housing Act of 1937
Scattered Sites 204 (Albemarle) MD002000204	Scattered Sites 204 (Albemarle) MD002000204	4 Family units	Intent to RAD all four units as part of HABC's RAD IV conversion				All units will undergo RAD conversion

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
Scattered Sites 205 (Bailey) MD002000205	Scattered Sites 205 (Bailey) MD002000205	34 Family units		Continue rehab of viable vacant units, evaluate inventory as units become vacant			
Scattered Sites 206 (Preston Street) MD002000206	9 Family units		Continue rehab of viable vacant units, evaluate inventory as units become vacant				Section 32 of Housing Act of 1937
Scattered Sites 208 (The Bailey 10) MD002000208	1 Family unit	Units will become part of the scattered sites inventory and operated as conventional public housing	Acquire nine additional units to satisfy the Bailey consent decree				
Thompson 22 MD002000123	22 Family units	Intent to RAD all 22 units as part of HABC's RAD IV conversion				All units to undergo RAD conversion	
Midtown Apartments MD002000103	35 Family units	Nonviable units have been identified, and HABC is in the process of submitting replacement units to the State	Continue rehab of viable vacant units, evaluate inventory as units become vacant	Work with Maryland State DHCD to identify replacement units for nonviable properties			
Uptown Apartments MD002000108	35 Family units	Nonviable units have	Continue rehab of viable vacant	Work with Maryland State			

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
		been identified, and HABC is in the process of submitting replacement units to the State	units, evaluate inventory as units become vacant	DHCD to identify replacement units for nonviable properties			
<b>Mixed Developments</b>							
Barclay MD002000121	53						
Monastery Gardens Apartments MD002000102	11						
Montpelier Apartments MD002000104	13						
St Ambrose MD002000116	30						
West Hills Square MD002000113	11						
<b>Current/Planned RAD Conversions</b>							
Albemarle Square MD002000114	130	Planning for RAD Conversion.	Potential for refinancing, re-syndication.	Possible disposition/demolition application			

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
			Potential for conversion to project-based assistance under RAD	planned in connection with RAD/PBV Blend.			
Allendale Apartments MD002000075	164						
Arbor Oaks MD002000101	62		Potential for refinancing, re-syndication. Planned conversion to RAD PBV or blended RAD PBV and PBV	Possible disposition/demolition application planned in connection with RAD/PBV Blend.			
Bel Park Tower MD002000054	253						
Bernard E. Mason MD002000051	84						
Broadway Overlook MD002000112	84						
Carey House MD0020202	23		Planned conversion to RAD PBV or blended RAD PBV and PBV	Possible disposition/demolition application planned in connection with RAD/PBV Blend.			
Chase House (Mont Vernon LP) MD002000046	189						
Dukeland MD002031	30		Planned conversion to RAD PBV or blended RAD PBV and PBV	Possible disposition/demolition application planned in connection with			

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
				RAD conversion.			
Govans Manor MD002000047	191						
Heritage Crossing II MD002000111	75						
Hillside Park MD002000105	30						
Hollander Ridge II MD002000207	94		Planned conversion to project based vouchers under RAD.	Possible disposition/demolition application planned redevelopment			
Hollins House MD002000074	130						
Homes for Arundel (Broadway Homes/Thompson 58) MD002000118	58						
J Van Story Branch Apartments MD002000041	350						
Lakeview Tower MD002000033	302						
Laurens House MD0020202	36		Planned conversion to RAD PBV or blended RAD PBV and PBV	Possible disposition/demolition application planned in connection with RAD/PBV Blend.			
McCulloh Homes Hi-Rise MD002000023	347						
Monument East Apartments MD002000043	170						

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
Perkins Homes MD002000003	629	Planning for mixed finance closings	Perkins Phase I, Somerset Phase II and III mixed income re-development Planned conversion to RAD PBV or blended RAD PBV and PBV	Disposition/ Demo application of Perkins Phases			
Pleasant View Gardens Townhomes MD002000110	201		Potential for change in entity ownership due to end of initial LIHTC compliance period. Potential for refinancing, re-syndication and conversion to project-based assistance under RAD.				
Pleasant View Gardens Senior MD002000110	110		Potential for change in entity ownership due to end of initial LIHTC compliance period. Potential for refinancing, re-syndication and conversion to project-based assistance under				



Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
			RAD.				
Oswego Mall MD0020203	35		Planned conversion to RAD PBV or blended RAD PBV and PBV	Possible disposition/demolition application planned in connection with RAD/PBV Blend.			
Primrose Place MD002000071	125						
Reservoir Hill2 MD002000117	40		Potential for change in entity ownership due to end of initial LIHTC compliance period. Potential for refinancing, re-syndication and conversion to project-based assistance under RAD.	Possible disposition/demolition application planned in connection with RAD/PBV Blend.			
Rosemont Low Rise Townhomes MD002031	106		Planned conversion to RAD PBV or	Possible disposition/demolition application			

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
			blended RAD PBV and PBV	planned in connection with RAD conversion.			
Rosemont Tower MD002000070	203						
Sharp Leadenhall MD002000119	23		Potential for change in entity ownership due to end of initial LIHTC compliance period. Potential for refinancing, re-syndication and conversion to project-based assistance under RAD.				
Shipley Hills MD0020203	24		Planned conversion to RAD PBV or blended RAD PBV and PBV	Possible disposition/demolition application planned in connection with RAD/PBV Blend.			
Somerset Court Extension MD002000042	64						
Somerset Homes/CNI Phase 2	100	Closing anticipated in FY 2022	Planned conversion to RAD PBV or blended RAD PBV and PBV				
Somerset Homes/CNI	36	Closing anticipated in FY 2022	Planned conversion to RAD PBV or blended RAD				

Name and Number	Number and Type	Note for FY 2022 Plan	Development Activities	Demolition/Disposition Activities	Designated Housing Activities	Conversion Activities	Home-ownership Activities
			PBV and PBV				
Terraces Garden Cooperative MD002000107	47						
Terraces Family Townhouses MD002000106	203		Potential for refinancing, re-syndication. Planned conversion to RAD PBV or blended RAD PBV and PBV	Possible disposition/demolition application planned in connection with RAD/PBV Blend.			
The Brentwood MD002000056	150						
The Ellerslie MD002000053	117						
Wyman House MD002000044	168						

## Appendix A: Asset Management Table (cont'd)

Listed below are scattered sites units that are planned for demolition and/or disposition in FY 2021 or subsequent periods. HABC may modify this listing in the future. Approvals by the HABC Board of Commissioners and HUD are required in order to proceed with demolition/disposition activities.

Unit ID	Project Name	Project Number	Bedrooms	Address	Zip Code
FM10103-0001	Midtown Apartments	MD002000103	1	922 N Calhoun St, A	21217
FM10103-0002	Midtown Apartments	MD002000103	2	922 N Calhoun St, B	21217
FM10103-0011	Midtown Apartments	MD002000103	1	1213 Mosher St, A	21217
FM10103-0012	Midtown Apartments	MD002000103	3	1213 Mosher St, B	21217
FM10103-0013	Midtown Apartments	MD002000103	2	1319 Mosher St	21217
FM10103-0016	Midtown Apartments	MD002000103	3	1603 Mosher St	21217
FM10103-0017	Midtown Apartments	MD002000103	1	1623 Mosher St, A	21217
FM10103-0018	Midtown Apartments	MD002000103	2	1623 Mosher St, B	21217
FM10103-0019	Midtown Apartments	MD002000103	1	1627 Mosher St, A	21217
FM10103-0020	Midtown Apartments	MD002000103	2	1627 Mosher St, B	21217
FM10103-0026	Midtown Apartments	MD002000103	3	1605 Riggs Av	21217
FM10108-0101	Uptown Apartments	MD002000108	2	913 N Calhoun St, A	21217
FM10108-0103	Uptown Apartments	MD002000108	2	915 N Calhoun St, A	21217
FM10108-0104	Uptown Apartments	MD002000108	2	915 N Calhoun St, B	21217
FM10108-0105	Uptown Apartments	MD002000108	2	917 N Calhoun St, A	21217
FM10108-0107	Uptown Apartments	MD002000108	4	921 N Calhoun St	21217
FM10108-0108	Uptown Apartments	MD002000108	2	1344 N Carey St	21217
FM10108-0112	Uptown Apartments	MD002000108	2	1449 N Carey St	21217
FM10108-0114	Uptown Apartments	MD002000108	2	1133 N Carrollton Av	21217
FM10108-0115	Uptown Apartments	MD002000108	1	920 N Gilmor St, A	21217
FM10108-0116	Uptown Apartments	MD002000108	3	920 N Gilmor St, B	21217
FM10108-0123	Uptown Apartments	MD002000108	2	1011 N Monroe St	21217
FM10108-0124	Uptown Apartments	MD002000108	4	1415 Mosher St	21217
FM10108-0130	Uptown Apartments	MD002000108	2	1800 Presbury St	21217
FM10108-0131	Uptown Apartments	MD002000108	2	1808 Presbury St	21217
FM10108-0137	Uptown Apartments	MD002000108	4	1152 N Stricker St	21217
FM10109-0205	Stricker Street Apartments	MD002000109	4	1306 N Carey St	21217

Unit ID	Project Name	Project Number	Bedrooms	Address	Zip Code
FM10109-0206	Stricker Street Apartments	MD002000109	2	1150 N Carrollton Av	21217
FM10109-0207	Stricker Street Apartments	MD002000109	1	1316 Mosher St, A	21217
FM10109-0208	Stricker Street Apartments	MD002000109	2	1316 Mosher St, B	21217
FM10109-0209	Stricker Street Apartments	MD002000109	4	1323 Mosher St	21217
FM10109-0210	Stricker Street Apartments	MD002000109	2	1718 W Presstman St	21217
FM10109-0203	Stricker Street Apartments	MD002000109	2	1713 N. Calhoun Street	21217
SS10200-0285	Scattered Sites 200	MD002000200	4	1015 N Caroline St	21205
SS10200-0387	Scattered Sites 200	MD002000200	5	1302 Aisquith St	21202
SS10200-0425	Scattered Sites 200	MD002000200	4	1601 Aisquith St	21202
SS10200-0426	Scattered Sites 200	MD002000200	2	1611 Aisquith St	21202
SS10200-0429	Scattered Sites 200	MD002000200	3	1607 Aisquith St	21202
SS10200-0777	Scattered Sites 200	MD002000200	2	1023 E Biddle St	21202
SS10200-1150	Scattered Sites 200	MD002000200	4	1006 E Preston St	21202
SS10200-1767	Scattered Sites 200	MD002000200	2	711 Mura St	21202
SS10200-1768	Scattered Sites 200	MD002000200	2	721 Mura St	21202
SS10200-1773	Scattered Sites 200	MD002000200	2	707 Mura St	21202
SS10200-1776	Scattered Sites 200	MD002000200	3	732 Mura St	21202
SS10200-1823	Scattered Sites 200	MD002000200	3	1009 Valley St	21231
SS10200-1825	Scattered Sites 200	MD002000200	5	822 E North Av	21202
SS10200-1834	Scattered Sites 200	MD002000200	2	1228 Aisquith St	21202
SS10200-1905	Scattered Sites 200	MD002000200	2	702 N Bradford St822	21205
SS10200-1994	Scattered Sites 200	MD002000200	2	1044 N Milton Av	21205
SS10200-2027	Scattered Sites 200	MD002000200	4	1106 E Preston St	21202
SS10200-2337	Scattered Sites 200	MD002000200	2	705 Mura St	21202
SS10200-2373	Scattered Sites 200	MD002000200	4	1113 Greenmount Av	21202
SS10200-2375	Scattered Sites 200	MD002000200	4	1115 Greenmount Av	21231
SS10200-2562	Scattered Sites 200	MD002000200	1	1301 N Central Av, 1FL	21202
SS10200-2563	Scattered Sites 200	MD002000200	3	1301 N Central Av, 2FL	21202
SS10200-2827	Scattered Sites 200	MD002000200	2	404 N Bradford St	21224
SS10200-1805	Scattered Sites 200	MD002000200	3	1030 Valley St	21202
SS10200-1544	Scattered Sites 200	MD002000200	3	411 North Av	21202
SS10200-1770	Scattered Sites 200	MD002000200	2	715 Mura St.	21231
SS10200-1760	Scattered Sites 200	MD002000200	2	727 Mura St.	21231
SS10201-0144	Scattered Sites 201	MD002000201	3	1402 N Chester St	21213
SS10201-0189	Scattered Sites 201	MD002000201	4	511 E 27 <sup>th</sup> St	21218
SS10201-0270	Scattered Sites 201	MD002000201	3	1309 E Biddle St	21213

Unit ID	Project Name	Project Number	Bedrooms	Address	Zip Code
SS10201-0754	Scattered Sites 201	MD002000201	2	2104 E Lafayette Av	21213
SS10201-1170	Scattered Sites 201	MD002000201	3	1724 N Chester St	21213
SS10201-1337	Scattered Sites 201	MD002000201	5	1738 E North Av	21213
SS10201-1352	Scattered Sites 201	MD002000201	3	1213 N Eden St	21213
SS10201-1409	Scattered Sites 201	MD002000201	3	2229 E Federal St	21213
SS10201-1436	Scattered Sites 201	MD002000201	5	715 E 20 <sup>th</sup> St	21218
SS10201-1450	Scattered Sites 201	MD002000201	1	320 E 20 <sup>th</sup> St	21213
SS10201-1451	Scattered Sites 201	MD002000201	3	320 E 20 <sup>th</sup> St, 2FL	21213
SS10201-1485	Scattered Sites 201	MD002000201	3	2316 E North Av	21213
SS10201-1558	Scattered Sites 201	MD002000201	2	510 E 26 <sup>th</sup> St	21218
SS10201-1570	Scattered Sites 201	MD002000201	2	1819 N Montford Av	21213
SS10201-2570	Scattered Sites 201	MD002000201	2	1841 N Montford Av	21213
SS10201-2548	Scattered Sites 201	MD002000201	5	2200 Greenmount Av	21218
SS10201-2753	Scattered Sites 201	MD002000201	3	1323 N Patterson Pk Av	21213
SS10201-2251	Scattered Sites 201	MD002000201	3	724 McCabe Av	21212
SS10201-1557	Scattered Sites 201	MD002000201	3	509 E 22 <sup>nd</sup> Street	21218
SS10201-0122	Scattered Sites 201	MD002000201	3	2012 E. 30 <sup>th</sup> Street	21218
SS10201-0197	Scattered Sites 201	MD002000201	3	618 E 37 <sup>th</sup> St	21218
SS10201-2764	Scattered Sites 201	MD002000201	2	320 E 27 <sup>th</sup> St	21218
SS10201-2031	Scattered Sites 201	MD002000201	3	1410 N Luzerne Av	21213
SS10201-1545	Scattered Sites 201	MD002000201	Vacant Lot	318 E. 20 <sup>th</sup> St	21218
SS10201-1453	Scattered Sites 201	MD002000201	Vacant Lot	324 E 20 <sup>th</sup> St	21218
SS10201-1454	Scattered Sites 201	MD002000201	Vacant Lot	324 E 20 <sup>th</sup> St	21218
SS10201-1605	Scattered Sites 201	MD002000201	Vacant Lot	328 E 20 <sup>th</sup> St	21218
SS10201-1440	Scattered Sites 201	MD002000201	Vacant Lot	336 E 20 <sup>th</sup> St A	21218
SS10201-1441	Scattered Sites 201	MD002000201	Vacant Lot	336 E 20 <sup>th</sup> St B	21218
SS10201-2303	Scattered Sites 201	MD002000201	Vacant Lot	324 E 20 ½ St	21218
SS10201-0386	Scattered Sites 201	MD002000201	Vacant Lot	2002 Barclay St	21218
SS10201-1311	Scattered Sites 201	MD002000201	Vacant Lot	2006 Barclay St	21218
SS10201-0493	Scattered Sites 201	MD002000201	Vacant Lot	2008 Barclay St	21218
SS10201-0383	Scattered Sites 201	MD002000201	2	505 E. 26 <sup>th</sup> St.	21218
SS10201-2891	Scattered Sites 201	MD002000201	4	527 Beaumont Ave.	21212
SS10201-2917	Scattered Sites 201	MD002000201	5	712 E. 20 <sup>th</sup> St.	21218

Unit ID	Project Name	Project Number	Bedrooms	Address	Zip Code
SS10201-0944	Scattered Sites 201	MD002000201	Vacant Lot	2112 N. Calvert St. Unit A	21218
SS10201-0945	Scattered Sites 201	MD002000201	Vacant Lot	2112 N. Calvert St. Unit B	21218
SS10201-1401	Scattered Sites 201	MD002000201	Vacant Lot	2114 N. Calvert St. Unit A	21218
SS10201-1402	Scattered Sites 201	MD002000201	Vacant Lot	2114 N. Calvert St. Unit B	21218
FM10026-0951	Scattered Sites 202	MD002000202	5	521 McMechen St	21217
FM10026-0955	Scattered Sites 202	MD002000202	3	529 McMechen St	21217
FM10026-0962	Scattered Sites 202	MD002000202	4	1500 Division St	21217
FM10026-0964	Scattered Sites 202	MD002000202	4	1504 Division St	21217
FM10026-0965	Scattered Sites 202	MD002000202	4	1506 Division St	21217
FM10026-0966	Scattered Sites 202	MD002000202	4	1508 Division St	21217
FM10026-0967	Scattered Sites 202	MD002000202	4	1510 Division St	21217
FM10026-0968	Scattered Sites 202	MD002000202	4	1512 Division St	21217
FM10026-0969	Scattered Sites 202	MD002000202	4	1514 Division St	21217
SS10202-0225	Scattered Sites 202	MD002000202	2	1702 McKean Av	21217
SS10202-0348	Scattered Sites 202	MD002000202	6	1324 N Mount St	21217
SS10202-0639	Scattered Sites 202	MD002000202	1	1814 Edmondson Av, 1FL	21217
SS10202-0640	Scattered Sites 202	MD002000202	3	1814 Edmondson Av, 2FL	21217
SS10202-0838	Scattered Sites 202	MD002000202	3	510 N Schroeder St	21223
SS10202-0932	Scattered Sites 202	MD002000202	3	1113 N Carrollton Av	21217
SS10202-1198	Scattered Sites 202	MD002000202	4	930 W Franklin St	21223
SS10202-1237	Scattered Sites 202	MD002000202	5	1510 W Lanvale St	21217
SS10202-1538	Scattered Sites 202	MD002000202	2	1805 Clifton Av	21217
SS10202-1951	Scattered Sites 202	MD002000202	6	528 N Stricker St	21223
SS10202-1989	Scattered Sites 202	MD002000202	5	1328 N Mount St	21217
SS10202-2112	Scattered Sites 202	MD002000202	2	2217 Druid Hill Av, 1FL	21217
SS10202-2113	Scattered Sites 202	MD002000202	2	2217 Druid Hill Av, 2FL	21217
SS10202-2165	Scattered Sites 202	MD002000202	3	1404 N Fulton Av	21217
SS10202-2404	Scattered Sites 202	MD002000202	4	914 N Fremont Av	21217
SS10202-2448	Scattered Sites 202	MD002000202	2	1905 Herbert St	21217
SS10202-2594	Scattered Sites 202	MD002000202	4	538 Laurens St	21217
SS10202-2605	Scattered Sites 202	MD002000202	2	1330 Laurens St, 001	21217
SS10202-2608	Scattered Sites 202	MD002000202	2	1330 Laurens St, 004	21217
SS10202-2611	Scattered Sites 202	MD002000202	2	1330 Laurens St, 101	21217
SS10202-2613	Scattered Sites 202	MD002000202	1	1330 Laurens St, 103	21217
SS10202-2615	Scattered Sites 202	MD002000202	2	1330 Laurens St, 105	21217
SS10202-2620	Scattered Sites 202	MD002000202	1	1330 Laurens St, 110	21217
SS10202-2621	Scattered Sites 202	MD002000202	2	1330 Laurens St, 201	21217
SS10202-2627	Scattered Sites 202	MD002000202	1	1330 Laurens St, 207	21217

Unit ID	Project Name	Project Number	Bedrooms	Address	Zip Code
SS10202-2629	Scattered Sites 202	MD002000202	0	1330 Laurens St, 209	21217
SS10202-2632	Scattered Sites 202	MD002000202	1	1330 Laurens St, 302	21217
SS10202-2639	Scattered Sites 202	MD002000202	0	1330 Laurens St, 309	21217
SS10202-2641	Scattered Sites 202	MD002000202	2	1431 N Carey St, 001	21217
SS10202-2642	Scattered Sites 202	MD002000202	1	1431 N Carey St, 002	21217
SS10202-2643	Scattered Sites 202	MD002000202	2	1431 N Carey St, 003	21217
SS10202-2652	Scattered Sites 202	MD002000202	2	1431 N Carey St, 203	21217
SS10202-2655	Scattered Sites 202	MD002000202	1	1431 N Carey St, 206	21217
SS10202-2658	Scattered Sites 202	MD002000202	1	1431 N Carey St, 302	21217
SS10202-2661	Scattered Sites 202	MD002000202	1	1431 N Carey St, 305	21217
SS10202-2662	Scattered Sites 202	MD002000202	1	1431 N Carey St, 306	21217
SS10202-2663	Scattered Sites 202	MD002000202	2	1431 N Carey St, 307	21217
SS10202-0684	Scattered Sites 202	MD002000202	4	1113 N. Gilmor St	21217
SS10202-0658	Scattered Sites 202	MD002000202	1	636 N Carrollton Av 1 <sup>st</sup> FL	21217
SS10202-0661	Scattered Sites 202	MD002000202	2	636 N Carrollton Av 2 <sup>nd</sup> FL	21217
SS10202-0805	Scattered Sites 202	MD002000202	1	823 N Fremont Av, 1 <sup>st</sup> FL	21217
SS10202-0806	Scattered Sites 202	MD002000202	4	823 N Fremont Av, 2 <sup>nd</sup> FL	21217
SS10202-2454	Scattered Sites 202	MD002000202	2	1915 Herbert St.	21217
FM10034-0306	Scattered Sites 203	MD002000203	3	2478 Shirley Av	21215
FM10034-0307	Scattered Sites 203	MD002000203	4	2480 Shirley Av	21215
FM10034-0313	Scattered Sites 203	MD002000203	4	4000 Oswego Ct	21215
FM10034-0314	Scattered Sites 203	MD002000203	4	4002 Oswego Ct	21215
FM10034-0316	Scattered Sites 203	MD002000203	4	4006 Oswego Ct	21215
FM10034-0321	Scattered Sites 203	MD002000203	4	4016 Oswego Ct	21215
FM10034-0322	Scattered Sites 203	MD002000203	2	4018 Oswego Ct	21215
FM10034-0323	Scattered Sites 203	MD002000203	4	4001 Oswego Ct	21215
FM10034-0326	Scattered Sites 203	MD002000203	4	4007 Oswego Ct	21215
FM10034-0328	Scattered Sites 203	MD002000203	4	4011 Oswego Ct	21215
FM10034-0330	Scattered Sites 203	MD002000203	4	4015 Oswego Ct	21215
FM10034-0335	Scattered Sites 203	MD002000203	4	2605 Oswego Av	21215
FM10034-0340	Scattered Sites 203	MD002000203	2	2615 Oswego Av	21215
SS10203-0069	Scattered Sites 203	MD002000203	3	3024 Woodland Av	21215
SS10203-0163	Scattered Sites 203	MD002000203	3	5332 Beaufort Av	21215
SS10203-0226	Scattered Sites 203	MD002000203	2	2712 Prospect St	21216
SS10203-0243	Scattered Sites 203	MD002000203	5	1734 W Lexington St	21223
SS10203-0529	Scattered Sites 203	MD002000203	3	2428 W Franklin St	21223
SS10203-0568	Scattered Sites 203	MD002000203	2	610 Glenolden Av	21216
SS10203-0845	Scattered Sites 203	MD002000203	3	214 S Fulton Av	21223
SS10203-0913	Scattered Sites 203	MD002000203	3	301 S Franklinton Rd	21223
SS10203-1204	Scattered Sites 203	MD002000203	1	2544 McHenry St	21223



Unit ID	Project Name	Project Number	Bedrooms	Address	Zip Code
SS10203-1205	Scattered Sites 203	MD002000203	1	2546 McHenry St	21223
SS10203-1206	Scattered Sites 203	MD002000203	1	2548 McHenry St	21223
SS10203-1207	Scattered Sites 203	MD002000203	1	2550 McHenry St	21223
SS10203-1208	Scattered Sites 203	MD002000203	2	2552 McHenry St	21223
SS10203-1209	Scattered Sites 203	MD002000203	1	2554 McHenry St	21223
SS10203-1210	Scattered Sites 203	MD002000203	3	213 S Franklinton Ct	21223
SS10203-1215	Scattered Sites 203	MD002000203	3	223 S Franklinton Ct	21223
SS10203-1216	Scattered Sites 203	MD002000203	3	201 S Franklinton Ct	21223
SS10203-1467	Scattered Sites 203	MD002000203	4	313 N Fulton Av	21223
SS10203-1676	Scattered Sites 203	MD002000203	3	4206 Park Heights Av	21215
SS10203-1863	Scattered Sites 203	MD002000203	3	2522 Boyd St	21223
SS10203-1870	Scattered Sites 203	MD002000203	3	1834 Wilhelm St	21223
SS10203-1937	Scattered Sites 203	MD002000203	2	1824 W Fairmount Av	21223
SS10203-2081	Scattered Sites 203	MD002000203	3	4204 Park Heights Av	21215
SS10203-2178	Scattered Sites 203	MD002000203	2	546 N Payson St	21223
SS10203-2269	Scattered Sites 203	MD002000203	1	2227 W Baltimore St, 1FL	21223
SS10203-2270	Scattered Sites 203	MD002000203	4	2227 W Baltimore St, 2FL	21223
SS10203-2432	Scattered Sites 203	MD002000203	3	2520 Boyd St	21223
SS10203-2526	Scattered Sites 203	MD002000203	3	1346 N Fremont Av	21217
SS10203-2569	Scattered Sites 203	MD002000203	3	4901 Queensberry Av	21215
SS10203-2761	Scattered Sites 203	MD002000203	3	1717 N Smallwood St	21216
SS10203-2810	Scattered Sites 203	MD002000203	3	3030 Baker St	21216
SS10203-2849	Scattered Sites 203	MD002000203	3	4108 Park Heights Av	21215
SS10203-2855	Scattered Sites 203	MD002000203	3	3114 Woodland Av	21215
SS10203-2884	Scattered Sites 203	MD002000203	3	2817 Waldorf Av	21215
SS10203-2886	Scattered Sites 203	MD002000203	3	2116 Presbury St	21216
SS10203-2895	Scattered Sites 203	MD002000203	3	3012 Oakley Av	21215
SS10203-0702	Scattered Sites 203	MD002000203	2	2444 Laurretta Av	21223
SS10203-0319	Scattered Sites 203	MD002000203	4	2912 Walbook Av	21216
SS10203-2872	Scattered Sites 203	MD002000203	2	3907 Park Heights Ave.	21217
SS10203-0162	Scattered Sites 203	MD002000203	3	5318 Beaufort Ave.	21215
SS10203-0161	Scattered Sites 203	MD002000203	3	5326 Beaufort Ave.	21215
SS10203-0054	Scattered Sites 203	MD002000203	3	5330 Beaufort Ave	21215
SS10200-2338	Scattered Sites 203	MD002000203	2	713 Mura St.	21231

## Appendix B: Student Housing Initiative Hardship Policy

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

Leaves beyond two months in duration must be the result of conditions out of the control of the SHI participant, i.e. health, disability or family related emergency. Where a SHI student leaves the program and reapplies, they will be required to provide verification of the reason for their absence. Absences related to failure to meet the GPA, voucher program or school code of conduct requirements will not be considered for hardship.

Approval for a hardship related return, after an extended absence, is subject to funding availability. Where funding is available, HABC may authorize a return by an SHI participant even if there are already 10 existing SHI participants.

SHI students who apply for a hardship return to the SHI program must submit a written request to the college/university from which they were enrolled. Hardship requests will be reviewed, and a determination made by both the college/university and HABC. Returning students will be re-screened for eligibility upon return to the program. Requests submitted more than 24 months after the start of the absence will not be accepted.

## Appendix C: Estimated Sources and Uses: Non-MTW Funds

This section of the Annual Plan provides information on HABC's planned sources and uses of non-MTW HUD funds. This financial plan is compiled based on current data as of July 2021. It is subject to revision as conditions and/or assumptions change. This section includes a summary of HABC's planned non-MTW activities, i.e. activities that do not specifically require use of MTW Agreement authority in order to be implemented.

### Estimated Sources of Non-MTW Funds

#### Estimated Sources of Non- MTW Funding for FY 2022

SOURCES	
FDS Line Item Name	Dollar Amount
Tenant Revenue	\$1,761,061
HUD PHA Operating Grants	\$13,388,934
Capital Grants	\$5,516,932
Total Fee Revenue	-
Interest Income	-
Gain or Loss on Sale of Capital Assets	-
Other Income	\$9,396,609
<b>Total Revenue</b>	<b>\$30,063,536</b>

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

- Other Section 8 Programs include the Section 8 Veterans Affairs Supportive Housing (VASH), Moderate Rehabilitation, Substantial Rehabilitation, Family Unification and Non-elderly disabled programs.
- State and Local Programs
- HABC's forced account (HABCo)
- Planning and Development program
- Partnership Rental Housing Programs (PRHP) market rate units
- Energy Performance Contract
- Resident Service Grant (Our House-Friends of the Family)
- Resident Opportunity Self Sufficiency (ROSS)
- Jobs Plus Program

### Notes to Sources:

- Total Tenant Revenue is for PRHP market rate units managed by HABC's privatized firms.
- HUD Operating Grants include the following:
  - Housing Assistance Payments (HAP) subsidies planned for Other Section 8 programs in the amount of \$7,112,286
  - Ongoing Administrative Fees Earned estimated in the amount of \$618,776
- Other Income includes the following:
  - HABCo's construction and maintenance activities \$1,556,121.
  - Market rate activities \$8,830.
  - ROSS grant activities from previously awarded grants \$638,739.
  - Jobs Plus activities from previously awarded grants \$489,861.
  - City of Baltimore instantaneous reimbursement of pass-through activities 3,100,000.
  - Resident Services grant activities \$1,186,390.
  - 673,188 in BAHD income and \$796,583 in other funds to cover P&D cost.
  - HABC's EPC II activities \$1,068,397

### Estimated Uses of Non-MTW Funds

#### Estimated Uses of Non- MTW Funding for FY 2022

USES	
FDS Line Item Name	Dollar Amount
Total Operating – <i>Administrative</i>	\$5,218,595
Management Fee Expense	-
Allocated Overhead	\$482,529
Total Tenant Services	\$2,829,872
Total Utilities	\$278,243
Labor	-
Total Ordinary Maintenance	\$3,912,814
Total Protective Services	\$32,815
Total Insurance Premiums	-
Total Other General Expenses	\$1,288,102

USES	
FDS Line Item Name	Dollar Amount
Total Interest Expense and Amortization Cost	-
Total Extraordinary Maintenance	-
Housing Assistance Payments	\$13,253,274
Depreciation Expense	\$463,953
All Other Expenses	-
<b>Total Expenses</b>	<b>\$27,760,197</b>

Total Expenses	\$27,760,197
Less: Depreciation Expense	\$(463,953)
Hard Cost	3,255,007
<b>Non-MTW Uses of Funds</b>	<b>\$30,551,251</b>

Uses of Funds exceed Sources of Fund by \$487,715 which will be a transfer from reserves.

**Notes to Uses:**

- Administrative expenses include salaries and benefits to administer the Non-MTW programs. Also included in this expense category are office supplies, telephone, postage, and other computer materials and contracts.
- Allocated Overhead is calculated based on HUD's approved Local Asset Management Program since FY 2010. The proposed updated cost allocation calculations for CY 2022 are included in Appendix D.
- Tenant Services include salaries and benefits of employees for the ROSS grants, Jobs Plus grant, and Our House program. It also includes other materials and services as required by the grant agreements.

- Ordinary Maintenance expenses are related to the City of Baltimore pass-through (non-capitalized) activities being performed by HABC's force-labor department (HABCo). HABC receives instantaneous reimbursement from the City for these activities.
- Other General Expenses include PILOT, applicable portions of compensating absence for the non-MTW programs, bad debt and RFR for HABC's market rate units.
- Housing Assistance Payments (HAPs) include rent subsidies paid to landlords and utility assistance paid to tenants of Other Section 8 program.

## Appendix D: Local Asset Management Plan

### **HABC CY22 Indirect Cost Rate Explanation: A component of HABC's Local Asset management Plan**

This cost allocation plan and process for Calendar Year 2022 represents year nine of HABC's local asset management plan allowed and approved as a component of its MTW participation.

#### **Cost Allocation Approach**

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

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

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

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

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

The above indirect cost services have been carefully reviewed and found to support multiple programs, and as such must be treated as indirect, and allocated out in proportion to the direct services they support.

The worksheet used to identify direct and indirect costs and to develop the anticipated indirect rate is attached to this narrative as Attachment A.

The specific approach is as follows:

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

All costs used in this analysis are from the HABC Fiscal Year 2021 Approved Consolidated Budget. Based on this budget and the attached schedule, the indirect cost rate for CY2022 will be 14.30% for MTW and 10.77% for non-MTW (see Attachment A for detail).



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

<u>Direct</u>	<u>OFR Treatment</u>	<u>FY20</u>	<u>FY21</u>		<u>Change</u>	<u>Share</u>	<u>MTW</u>	<u>Non-MTW</u>	<u>OH Limit</u>	<u>OH shortfall</u>
Sites (LIPH)	Dir	53,232,430	53,462,088	✓	0%	14%	53,462,088			
Sites PVT	Dir	7,625,326	3,210,418	✓	-58%	1%	3,210,418			
Sites (CFP hard-includes ECI)	Dir	24,543,446	17,464,019	✓	-29%	5%	17,464,019			
Sites (CFP soft - includes ECI)	Dir	1,609,030	2,933,085	✓	82%	1%	2,933,085			
Sites - Spec/Non-routine	Dir	-	-			0%				
EPC Costs (Hard) (Loan)	Dir	2,708,177	4,887,146		80%	1%		4,887,146		
EPC Soft (Loan)	Frontline	197,702	384,047		94%	0%	-	384,047		
Crews	COCC	2,694,587	2,835,484		5%	1%	2,835,484			
HCVF HAP	Dir	233,920,312	231,754,975		-1%	60%	224,642,689	7,112,286		
BRHP Admin	Dir	10,412,164	13,828,617		33%	4%	13,238,350	590,267		
BRHP Admin		5,765,771	5,723,699	✓	-1%	1%	5,723,699			
Development Hard/HOPE VI	Dir	10,195,794	7,657,800	✓	-25%	2%		7,657,800		
Development Soft	Mixed	775,180	1,091,786	✓	41%	0%		1,091,786		
DHCD Hard	Dir	-	4,860,000	✓		1%		4,860,000		
DHCD Soft	Mixed	4,082,381	3,016,000	✓	-26%	1%		3,016,000		
RAB	Dir	191,469	184,572	✓	-4%	0%	184,572	-		
Res Serv - LIPH	Frontline	1,619,185	1,837,722	✓	13%	0%	1,837,722			
Res Serv - Grants	Frontline	4,158,797	3,882,331	✓	-7%	1%		3,882,331	-	303,210
Facilities Non ACC Properties			400,000	✓	#DIV/0!	0%		400,000		
Energy	Frontline	683,633	690,909	✓		0%	690,909			
F&A Frontline		74,872	72,871	✓	-3%	0%	72,871			
FHEO Front Line		123,509	91,021	✓	-26%	0%	91,021			
HABCO Hard	Dir	-	-			0%	-			
HABCO Soft	Frontline	1,447,559	1,449,597	✓	0%	0%		1,449,597		
Hsg. Applic.	Frontline	1,121,082	1,172,988	✓	5%	0%	1,172,988			
Hsg. Ops. (dir)	Frontline	3,157,470	3,377,743	✓	7%	1%	3,377,743			
Homnrsdp	Frontline	42,830	-	✓	-100%	0%				
Legal, Lease enforcement	Frontline	-	-	✓		0%				
MPA	Frontline	928,270	1,018,101	✓	10%	0%	1,018,101			
Relocation	Frontline	-	-	✓		0%				
Work Order Ctr.	Frontline	-	-	✓		0%	-			
Fund 113	Dir	1,936,821	1,723,668	✓	-11%	0%	-	1,723,668	-	134,618
Undesignated/Legacy	Frontline	4,100,000	5,966,013		46%	2%	5,966,013			
Legal FL	Frontline	-	-			0%				
Less AMP/FL planned cuts	FL/Dir	-	(1,796,554)			0%	(1,796,554)			
<b>Subtotal Direct</b>		<b>377,347,797</b>	<b>373,180,146</b>		<b>-1%</b>	<b>96%</b>	<b>336,125,218</b>	<b>37,054,928</b>	<b>-</b>	
<u>Less: Non-Relevant Expenses</u>										
Hard Cost (Devel, HABCO)		37,645,119	30,008,965		-20%		17,464,019	12,544,946		
HAP		233,920,312	231,754,975		-1%		224,642,689	7,112,286		
BRHP		5,765,771	5,723,699		-1%		5,723,699			
Debt Service							-			
DHCD Hard cost		4,082,381	7,876,000		93%		-	7,876,000		
<u>RAD Deduct (out in 20) *</u>		<u>-</u>	<u>-</u>				<u>-</u>	<u>-</u>		
<b>Subtotal Direct</b>		<b>95,934,214</b>	<b>97,816,507</b>		<b>2%</b>		<b>88,294,811</b>	<b>9,521,696</b>	<b>97,816,507</b>	

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

							90%	10%			Total Program Cost (Direct + Indirect)
					Change		MTW Direct	Non-MTW Dir	MTW Indir	Non-MTW Ind	
Low Rent		74,911,030	72,123,376		-4%		72,123,376	-	10,365,844	-	82,489,220
CFP/RHF		1,609,030	2,933,085		82%		2,933,085	-	409,223	-	3,342,308
HCYP		10,412,164	13,828,617		33%		13,238,350	590,267	1,847,011	82,354	15,757,982
							-				
Devel		775,180	1,091,788		41%		-	1,091,788	-	152,328	1,244,112
HABCO		1,447,559	1,449,597		0%			1,449,597		202,247	1,651,844
DHCD									*	*	*
Grants		4,158,797	3,882,331		-7%			3,882,331		-	3,882,331
EPC		693,633	384,047		-44%		-	384,047	-	53,582	437,629
Bit Activities		1,936,821	2,123,668		10%			2,123,668	-	296,294	2,419,962
		<b>95,934,214</b>	<b>97,816,507</b>		2%		<b>88,294,811</b>	<b>9,521,636</b>	<b>12,622,078</b>	<b>786,803</b>	<b>111,225,387</b>
<i>Indirect</i>											
Admin Services	COCC	338,212	349,279		3%	0%					
Audits	COCC					0%					
Budgets	COCC	596,458	607,272		2%	0%					
CAO	COCC	331,460	334,710		1%	0%					
CFO	COCC	430,264	448,867		4%	0%					
Agency w/ide	COCC					0%					
Communications	COCC	754,324	740,345		-2%	0%					
COO	COCC	483,856	479,258		-3%	0%					
CEO	COCC	799,331	905,538		13%	0%					
Facilities/Bldg. Support	COCC	1,073,906	1,102,710		3%	0%					
FHEO	COCC	479,060	520,328		9%	0%					
Finance & Accounting	COCC	1,774,398	1,790,592		1%	0%					
HousingStat	COCC					0%					
Human Resources	COCC	1,512,333	1,255,108		-17%	0%					
IT	COCC	1,893,658	2,377,280		26%	1%					
Inspector General	COCC	538,682	468,167		-13%	0%					
Legal - attorneys	COCC	1,503,685	1,510,649		0%	0%					
MPA	Frontline					0%					
P&D	COCC					0%					
Procurement	COCC	766,978	686,208		-11%	0%					
Legacy costs	COCC	75,217	71,021		-6%	0%					
5% Salary Addback	COCC										
Anticipated cuts	COCC										
<b>Subtotal Indirect</b>		<b>13,363,022</b>	<b>13,647,332</b>		2%	4%	<b>12,318,868</b>	<b>1,328,464</b>	<b>13,647,332</b>		
<b>Indirect Rate</b>		<b>13.93%</b>	<b>13.95%</b>								
<b>Program totals (Dir + Ind)</b>		<b>109,297,236</b>	<b>111,463,839</b>		2%						
							90%	10%			
<b>Indirect Cost Rate (ID) - blended</b>					13.95%		<b>13.95%</b>	<b>13.95%</b>			
<b>TOTAL</b>		<b>390,710,819</b>	<b>386,827,478</b>		-1%	100%	<b>348,444,086</b>	<b>38,383,392</b>			
							90%	10%			
<i>Reallocation of non-allocable overhead</i>							303,210	(303,210)			
<b>Total Indirect Charges</b>		<b>13,363,022</b>	<b>13,647,332</b>		2%	3.93%	<b>12,622,078</b>	<b>1,025,254</b>			
<b>Total Program Indirect Rate</b>							<b>14.30%</b>	<b>10.77%</b>			
Tot Exp. per Sources and Uses File		390,710,819	388,646,200								
Overall Proof		390,710,819	386,827,478								2,413,767
Anticipated cuts		-	(1,796,554)								
Variance		-	22,168								
Final Variance					0.00%						



## Appendix E: Board Resolution

### HOUSING AUTHORITY OF BALTIMORE CITY

#### **A Resolution of the Board of Commissioners Approving the Moving to Work Annual Plan, the Housing Choice Voucher Administrative Plan, and the Public Housing Admissions and Continued Occupancy Policies for Fiscal Year 2022**

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

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

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

**WHEREAS**, in accordance with Section VII. A.1.f. of the MTW Restated Agreement and Attachment B thereto, HABC has prepared its Annual MTW Plan for fiscal year 2022 (the “FY 2022 Annual Plan”) consistent with the terms and objectives of the MTW Restated Agreement; and

**WHEREAS**, HABC has made the FY 2022 Annual Plan, revisions to the FY 2022 Housing Choice Voucher Program (“HCVP”) Administrative Plan, and revisions to the FY 2022 Public Housing Admissions and Continued Occupancy Policies (“ACOP”) available for review and comment by HABC residents, the HABC Resident Advisory Board, other resident organizations, advocacy groups, and the general public (collectively, the “Community”) for a period of thirty (30) days; and

**WHEREAS**, HABC met with the Resident Advisory Board and other resident organizations throughout the planning process to discuss the FY 2022 Annual Plan, including revisions to the FY 2022 HCVP Administrative Plan and the FY 2022 ACOP, and to gather input; and

**WHEREAS**, on August 31, 2021, HABC held a public hearing and received public comments on the FY 2022 Annual Plan, and in accordance with the MTW Restated Agreement HABC has considered all comments received on the FY 2022 Annual Plan, including revisions to the FY 2022 HCVP Administrative Plan and the FY 2022 ACOP.

**NOW THEREFORE, BE IT RESOLVED BY** the HABC Board of Commissioners (the “Board”), as follows:

Page 1 of 2

Bd. Reso. FY 2022 MTW Annual Plan  
September 2021

1. The FY 2022 Annual Plan is hereby approved and HABC is authorized to submit the FY 2022 Annual Plan to HUD.

2. The FY 2022 HCVP Administrative Plan is hereby approved.

3. The FY 2022 ACOP is hereby approved.

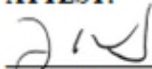
4. The FY 2022 Annual Plan Certifications of Compliance with Regulations (the "Certifications"), attached hereto as Exhibit A, are hereby adopted, and the Chairperson of the Board is hereby authorized to execute such Certifications on behalf of the Board.

5. Upon approval by HUD, the President/CEO shall be authorized to cause the implementation of the FY 2022 Annual Plan.

6. The President/CEO, or designee, is hereby authorized to take any and all appropriate actions, and execute all appropriate documents necessary to carry out this Resolution consistent with its terms.

**PASSED, ADOPTED AND APPROVED** this 21st day of September 2021.

**ATTEST:**



Janet Abrahams  
Secretary/President/CEO



Robin Carter  
Chairperson

Approved as to form and legal sufficiency  
this 16th day of September 2021 by:



Jan Goslee, EVP/General Counsel

Page 2 of 2

Bd. Reso. FY 2022 MTW Annual Plan  
September 2021



## Appendix F: Certification of Compliance

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

CERTIFICATIONS OF COMPLIANCE
<p align="center"><b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b>  <b>OFFICE OF PUBLIC AND INDIAN HOUSING</b>            Certifications of Compliance with Regulations:  <b>Board Resolution to Accompany the Annual Moving to Work Plan</b></p>
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2022), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p>
<p>(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.</p>
<p>(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.</p>
<p>(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).</p>
<p>(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.</p>
<p>(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.</p>
<p>(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.</p>
<p>(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.</p>
<p>(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.</p>
<p>(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.</p>
<p>(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.</p>
<p>(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.</p>

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



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

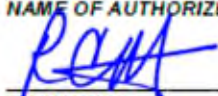
Housing Authority of Baltimore City (HABC)  
MTW PHA NAME

MD002  
MTW PHA NUMBER/HA CODE

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

Robin Carter  
NAME OF AUTHORIZED OFFICIAL

Chairperson, Board of Commissioners  
TITLE

  
SIGNATURE

12-30-2021  
DATE

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

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

## Appendix G: Certification of Consistency with Consolidated Plan



BALTIMORE CITY  
DEPARTMENT OF HOUSING &  
COMMUNITY DEVELOPMENT

### Certification of Consistency with the Baltimore City Consolidated Plan

To whom it may concern:

The Housing Authority of Baltimore City's *Moving to Work Annual Plan Fiscal Year 2022* is consistent in intent and content with Baltimore City's *July 1, 2020 – June 30, 2025 Consolidated Plan*. Several sections of the City's *Consolidated Plan* were developed in concert with the Housing Authority of Baltimore City including: Needs Assessment Section NA-35 Public Housing, pages 54 - 59; Market Analysis Section MA-25 Public and Assisted Housing, page 83 - 86; Strategic Plan Sections including SP-45 Goals Summary and Goal Descriptions, pages 151 – 160, and SP-50 Public Housing Accessibility and Involvement, pages 166 - 167.

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

SP-45 Goal 5: Create/ Increase Affordable Rental Housing, page 161;  
SP-45 Goal 6: Preservation of Existing Affordable Rental Housing; pages 162;  
SP-45 Goal 7: Housing for Special Needs Populations, page 162;  
SP-45 Goal 8: Provide Housing for People Experiencing Homelessness, page 162;  
SP-45 Goal 10: Implement Fair Housing Practices; pages 163.

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

Name of Certifying Jurisdiction: Baltimore City

Certifying Official of the Jurisdiction: Stephen Janes

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

Signature: *Stephen Janes*

Date: September 15, 2021

Brandon M. Scott, Mayor • Alice Kennedy, Acting Housing Commissioner  
417 East Fayette Street • Baltimore, MD 21202 • 443-984-5757 • [dhcd.baltimorecity.gov](http://dhcd.baltimorecity.gov)



## Appendix H: Public Process Documentation

Copy of the Newspaper Advertisement placed in the Daily Record on August 6<sup>th</sup>, 9<sup>th</sup> and 10<sup>th</sup>.

<b>The Daily Record</b> 200 St. Paul Place Suite 2480 Baltimore, Maryland 21202 1 (443) 524-8100 www.thedailyrecord.com		Page 1 of 1
<b>PUBLISHER'S AFFIDAVIT</b>		<b>Order #:</b> 12024639
We hereby certify that the annexed advertisement was published in <u>The Daily Record</u> , a daily newspaper published in the State of Maryland 3 times on the following dates:		<b>Case #:</b>
8/6/2021	8/9/2021	8/10/2021
 _____ Darlene Miller, Public Notice Coordinator (Representative Signature)		<b>Description:</b>  The following Housing Authority of Baltimore City (HABC) documents are now available to the public for review and comment on HABC's website at: <a href="https://www.habc.org/habc-information/plans-reports-policies/plans-reports-policies/">https://www.habc.org/habc-information/plans-reports-policies/plans-reports-policies/</a> 1. The FY 2022 MTW Annual

**The following Housing Authority of Baltimore City (HABC) documents are now available to the public for review and comment on HABC's website at:**

<https://www.habc.org/habc-information/plans-reports-policies/plans-reports-policies/>

1. The FY 2022 MTW Annual Plan;
2. The FY 2022 Housing Choice Voucher Administrative Plan (the HCVP Admin Plan);
3. A Summary of Changes to the FY 2022 HCVP Admin Plan;
4. The FY 2022 Baltimore Regional Housing Program Administrative Plan (the BRHP Admin Plan);
5. A Summary of Changes to the FY 2022 BRHP Admin Plan;
6. The FY 2022 Public Housing Admissions & Continued Occupancy Policies (ACOP); and
7. A Summary of changes to the FY 2022 ACOP

The deadline to submit all comments is **September 6, 2021**.

HABC will hold a virtual public meeting at **4:00 pm on Tuesday, August 31, 2021** via video conference through Cisco WebEx. You will be required to register for the video conference if you wish to submit comments during the public meeting or otherwise listen to the proceedings.

To submit comments during the video conference, upon registering, please select the drop-down response to indicate whether or not you wish to make comments at the meeting. **You must register for the virtual meeting no later than Monday August 30, 2021.**

Please cut and paste the link below into your web browser to **register for and/or join** the meeting:

<https://habc1.webex.com/habc1/joinstage/g.php?MTID=ecce10420643350906f019d657fb52d326>

Comments on the FY 2022 MTW Annual Plan may be submitted to HABC by:

1. Email to Jeannine Dunn at [Jeannine.dunn@habc.org](mailto:Jeannine.dunn@habc.org);
2. Registering to attend the public meeting by August 30, 2021 and answering "Yes" to the question; "Do you want to make a comment?"; and/or
3. First-class mail, Attention Jeannine Dunn to:  
Housing Authority of Baltimore City  
417 E. Fayette Street - 13th Floor  
Baltimore, Maryland 21202

au6,9,10



## Appendix I: Public Hearing: Comments Received on the FY 2022 Annual Plan

No	COMMENT RECEIVED	HABC RESPONSE
1.	<p><b><u>Emergency Housing Vouchers (EHVs):</u></b></p> <ul style="list-style-type: none"> <li>Information about Emergency Housing Vouchers in the Administrative Plan is limited, unclear and insufficient. It is recommended that HABC add language that outlines, at a minimum, referral source(s) and process(es) for the EHVs, as well as priorities or preferences that have been established. HABC should remove all but the mandatory criminal record screening criteria required as required by federal regulations and the HUD Notice PIH 2021-15 (HA), as recommended by the local Continuum of Care Board.</li> </ul>	<ul style="list-style-type: none"> <li>HABC's Administrative Plan will be amended to reflect the recommendations of the local Continuum of Care Board regarding the criminal record screening process.</li> <li>HABC will amend the Administrative Plan to include referral sources, process and screening criteria, including priority preferences for each category.</li> </ul>
2.	<p><b><u>Criminal Record Screening:</u></b></p> <ul style="list-style-type: none"> <li>Federal regulations only require public housing authorities (PHAs) to screen out applicants for the following reasons: (1) If a household member is subject to a lifetime registration requirement under a state sex offender registration program; (2) If a household member is currently engaging in illegal use of a drug; (3) If a PHA has reasonable cause to believe that a household member's illegal drug use may threaten the health, safety or right to peaceful enjoyment of the premises by other residents; and (4) If a household member has been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted</li> </ul>	<ul style="list-style-type: none"> <li>No Change – HABC's view is that our criminal background screening provisions are consistent with federal regulations.</li> </ul>

No	COMMENT RECEIVED	HABC RESPONSE
	<p>housing. HABC has adopted additional permissive prohibitions and denies eligibility for admission to the HCVP program for a period of 18 months for a misdemeanor conviction or a period of 3 years for a felony conviction. HABC should remove all but the mandatory prohibitions from its criminal record screening policy.</p>	
3.	<p><b><u>Minimum Rent:</u></b></p> <ul style="list-style-type: none"> <li>HABC's increase in the minimum rent for HCVP tenants from \$0.00 to \$25.00 per month is an unjust policy that punishes the poorest households who are unable to afford the additional burden. The hardship exemption to this policy that HABC provides presents participants with the challenge of understanding the exemption and applying for it. HABC should reverse the proposed minimum rent policy, or at a minimum, should enact a specific policy that eviction of a minimum-rent households for failure to pay rent will not be grounds for termination of the voucher.</li> </ul>	<ul style="list-style-type: none"> <li>No Change</li> </ul>
4.	<p><b><u>Processing Transfers:</u></b></p> <ul style="list-style-type: none"> <li>Proposed language in Section 10.22 of the ACOP states that "residents transferring between traditional public housing units will have three working days to return the keys to the losing development; residents transferring from private sites to traditional public housing must return keys to the private site immediately. Language stating that "the receiving property will need to bill the tenant for lost days based on double subsidy –</li> </ul>	<ul style="list-style-type: none"> <li>Language regarding billing for unreturned keys will be added to the ACOP. Tenants are informed about the requirement to return keys within a certain time, or they will be billed. However, going forward we will provide a letter with that information to the tenant before the transfer takes place.</li> </ul>

No	COMMENT RECEIVED	HABC RESPONSE
	<p>repayment agreement may be necessary” should be added to Section 10.22 of the ACOP.</p> <p>Tenants should clearly and explicitly be advised at lease up and at time of transfer that they will be billed for every day that keys to the old unit are not returned. And/or HABC should remove the provision about billing transferring tenants for unreturned keys.</p>	
5.	<p><b><u>Landlord Incentive Program:</u></b></p> <ul style="list-style-type: none"> <li>“Accessible unit” needs to have a standard definition, as most landlords do not understand what accessible means. HABC should coordinate with the City’s registration program to identify units that are intended to be accessible and FHA compliant and guide tenants to accessibility features that are intended to address a variety of disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>HABC include a definition for “accessible unit” in the Administrative Plan.</li> </ul>
6.	<p><b><u>RAD/Choice Mobility:</u></b></p> <ul style="list-style-type: none"> <li>This program is an opportunity to affirmatively further fair housing, but residents at RAD properties have stated that it is very hard to get on the Choice Mobility waiting list. Management turnover at RAD sites and new managers might not be sufficiently informed about the Choice Mobility program. HABC should collaborate with the advocacy community to get the word out about this program and secure funding from the City to provide enhanced leasing assistance to Choice Mobility participants.</li> </ul>	<ul style="list-style-type: none"> <li>Residents at RAD sites are information about the Choice Mobility program at move-in and at recertification. Managers at RAD sites are thoroughly trained about the Choice Mobility program, and HABC performs quality control to ensure that all necessary documentation and information about the Choice Mobility program is in tenant files.</li> </ul>
<b>Other General Questions/Comments</b>		
7.	<ul style="list-style-type: none"> <li>Why is HABC not pursuing the Faircloth to RAD option? It is</li> </ul>	<ul style="list-style-type: none"> <li>HABC has explored this possibility and has determined that it is not in our best interest to</li> </ul>

No	COMMENT RECEIVED	HABC RESPONSE
	an opportunity to expand affordable housing.	pursue the Faircloth to RAD platform at this time.
8.	<ul style="list-style-type: none"> <li>HUD's HCV utilization dashboard indicates that HABC has resources that could be used to assist with the affordable housing crisis and forthcoming increase in evictions. But there is nothing in the MTW Plan about how those resources could be used to assist low-income families who are housing insecure.</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>
9.	<ul style="list-style-type: none"> <li>HABC should implement programs for youth in public housing. For example, incentives for doing well in school or programs that create jobs for young people</li> </ul>	<ul style="list-style-type: none"> <li>HABC provides scholarships to college bound youth through its nonprofit arm, Resident Services, Inc. (RSI) and the Rising Star Scholarship program. HABC also partners with Youth Works as a Hire 1 employee and provides paid summer interns each year. In addition, HABC has launched Project 1902 to assist 1902 public housing children who are entering pre-school with reading readiness.</li> </ul>



## HOMELESS PERSONS REPRESENTATION PROJECT, INC.

201 North Charles Street, Suite 1104, Baltimore, Maryland 21201 (Headquarters)  
 (410) 685-6589 Toll Free (800) 773-4340 Fax (410) 625-0361  
 PO Box 1787, Rockville, Maryland 20849 (410) 387-3126 (Satellite Office)  
[www.hprplaw.org](http://www.hprplaw.org) [info@hprplaw.org](mailto:info@hprplaw.org)

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*President*

Jacqueline A. Brooks, Esq.  
*Vice President*

Erin Charles, CPA  
*Treasurer*

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*Skadden Fellow*

Angel Dawson  
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 Selena M. Santos  
*Paralegals*

Imani Walton  
*Social Media & Administrative Assistant*

September 7, 2021

Janet Abrahams, Executive Director  
 Housing Authority of Baltimore City  
 417 E. Fayette St., Suite 1314  
 Baltimore, MD 21201

Robin Carter, Chair  
 The Donne Group, LLC  
 3010 Ridgewood Ave., Ste. 202-A  
 Baltimore, MD 21215

Re: Comments to HABC's FY 2022 Draft MTW Annual Plan

Dear Ms. Abrahams & Chairwoman Carter,

The Homeless Persons Representation Project, Inc. (HPRP) appreciates the opportunity to comment on the Housing Authority of Baltimore City's (HABC) FY 2022 Draft MTW Annual Plan and proposed changes to the Administrative Plan and Admissions and Continued Occupancy Policy (ACOP).

### A. Emergency Housing Vouchers

HPRP applauds HABC for accepting the 278 Emergency Housing Vouchers (EHVs) made available by the United States Department of Housing and Urban Development (HUD) as part of the American Rescue Plan Act of 2021. The information included in the Administrative Plan about the EHVs, however, is extremely limited and insufficient. HPRP recommends that HABC add language to the Administrative Plan that outlines, at a minimum, the referral source(s) and process(es) for the EHVs as well as any and all priorities or preferences established for targeted award of the EHVs.

HPRP is deeply disappointed that HABC chose to establish permissive prohibition policies for the EHVs, beyond the mandatory prohibitions required by federal regulations and the HUD Notice PIH 2021-15 (HA), against the recommendation of the local Continuum of Care Board and HUD. This was a missed opportunity for HABC to remove all but the mandatory criminal record screening criteria, on a limited basis.

### B. Criminal Record Screening

Criminal record screening frequently presents an insurmountable barrier to safe, affordable housing for individuals with a criminal record. Research shows that having access to safe, affordable housing is critical to the success of individuals

reentering society after incarceration.<sup>1</sup>

Federal regulations governing criminal records screening for the HCVP require that PHAs screen out applicants for only four specific reasons – (1) if a household member is subject to a lifetime registration requirement under a state sex offender registration program; (2) if a household member is currently engaging in illegal use of a drug; (3) if a PHA has reasonable cause to believe that a household member's illegal drug use or pattern of illegal drug use may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents; or (4) if a household member has been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.<sup>2</sup> Beyond these limited mandatory prohibitions, HUD gives broad discretion to PHAs to adopt additional permissive prohibitions – or not.<sup>3</sup> HABC has adopted additional permissive prohibitions and currently denies eligibility for admission to the HCVP for a period of eighteen (18) months for a misdemeanor conviction or a period of three (3) years for a felony conviction.<sup>4</sup>

HUD has acknowledged that “criminal records-based barriers to housing are likely to have a disproportionate impact on minority home-seekers”<sup>5</sup> and has emphasized the importance of “helping ex-offenders gain access to one of the most fundamental building blocks of a stable life – a place to live.”<sup>6</sup> HPRP urges HABC to remove all but the mandatory prohibitions from its criminal record screening policy.

### C. Minimum Rent

HPRP remains deeply concerned with HABC's increase in the minimum rent for HCVP tenants from zero dollars (\$0) to twenty-five dollars (\$25) per month. Minimum rent inherently falls on the poorest participants. Because a minimum rent policy affects only the most destitute tenants, these very households would be at a high risk of homelessness in the absence of the very rental assistance that they currently receive. Since the implementation of minimum rent, individuals and families have faced rent increases totaling \$300 per year. While this amount might not seem significant, the families who have to pay it have no additional source of income with which to cover these costs. They therefore risk being forced to sacrifice what other minimal income they have from other critical living expenses, such as food, medicine, and clothing. Even if HABC points to the additional revenue brought in by the imposition of minimum rents, the agency is admitting to financing itself out of the pockets of its most vulnerable voucher recipients—those who have already been certified by HABC to have no ability to pay a minimum rent due to minimal or no household income.

<sup>1</sup> See, e.g., S. Metraux, et al. “Incarceration and Homelessness,” in *Toward Understanding Homelessness: The 2007 National Symposium on Homelessness Research*, #9 (D. Dennis, et al. eds., 2007), available at: <https://www.huduser.gov/portal/publications/pdf/p9.pdf>

<sup>2</sup> 24 C.F.R. 982.553(a)

<sup>3</sup> 24 C.F.R. 982.553

<sup>4</sup> HABC FY 2021 HCVP Administrative Plan at 15-11.

<sup>5</sup> HUD Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions, April 4, 2016, available at: [https://www.hud.gov/sites/documents/FAQ\\_EXCLUDE\\_ARREST\\_RECORDS.PDF](https://www.hud.gov/sites/documents/FAQ_EXCLUDE_ARREST_RECORDS.PDF).

<sup>6</sup> Letter from HUD Secretary Shaun Donovan and Assistant Secretary for Public and Indian Housing, Sandra B. Henriquez to PHAs, June 17, 2011, available at: [https://www.reentry.net/ny/library/item.530415-HUD\\_Secretary\\_Letter\\_to\\_PHA\\_re\\_Setting\\_Admission\\_and\\_Termination\\_Policies](https://www.reentry.net/ny/library/item.530415-HUD_Secretary_Letter_to_PHA_re_Setting_Admission_and_Termination_Policies).

As a theoretical cushion to alleviate the blow of their minimum rent policy, HABC has emphasized that households subject to this policy can seek a hardship exemption. However, these households face numerous barriers that make utilizing such administrative processes difficult. Many of the affected families include those who suffer from mental and cognitive disabilities. Therefore, they have a much greater challenge in both understanding the hardship exemption and attempting to apply for it. This has been thrown into further relief by office closures required by the COVID-19 pandemic and participants' contact with HABC limited to telephone or email.

These challenging realities are born out in a 2010 HUD-sponsored study into the usage of hardship exemptions by public housing agencies.<sup>7</sup> This study found that hardship exemptions are, in fact, extremely rare. Among agencies that had adopted minimum rents above zero (\$0) dollars, eighty-two percent (82%) of those agencies reported granting exemptions to fewer than 1 percent of families subject to the minimum rent, and only 5 percent of those agencies said that they had exempted more than 10 percent of families. The stark reality of such a low exemption rate should give HABC great pause and force it to reconsider whether potentially eligible households might actually obtain any relief and the worthiness of continuing such a policy.

HPRP strongly opposes the continued policy of minimum rent, as it is an unjust policy that punishes the poorest households who are unable to afford this additional burden. HPRP therefore urges HABC to reverse the proposed minimum rent policy. At a minimum, HABC should enact an explicit policy that eviction of a minimum-rent household for failure to pay rent will not be grounds for termination of the voucher. Such a policy could help to minimize the long-term jeopardy and risk of homelessness to affected households.

#### **D. Processing Transfers**

HPRP is concerned with HABC's proposed changes to Section 10.22 of the ACOP, which relates to tenants transferring between traditional public housing units or from private sites to traditional public housing. The proposed language states that *"[r]esidents transferring between traditional public housing units will have three working days to return the keys to the losing development; residents transferring from private sites to traditional public housing must return keys to the private site immediately."* The basis for the proposed modification expands the rule further – *"Receiving property will need to bill the tenant for lost days based on double subsidy – repayment agreement may be necessary for lost subsidy."*

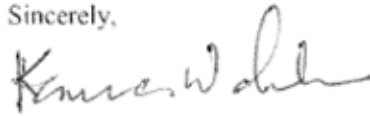
This language referencing billing a tenant for overlapping days during a move should be added to Section 10.22 of the ACOP. Tenants should also clearly and explicitly be advised at lease-up and at the time of transfer that they should return the keys to their old unit the same day they receive the keys to their new unit or they will be billed for every day until the keys are returned. Anything less is a gotcha! for unwary tenants and will increase the chances of public housing residents facing eviction for an unknown and unwritten provision.

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<sup>7</sup> Abt Associates et al, *Study of Rents and Rent Flexibility*, prepared for HUD Office of Public and Indian Housing, May 26, 2010, available at [http://www.huduser.org/publications/pdf/Rent%20Study\\_Final%20Report\\_05-26-10.pdf](http://www.huduser.org/publications/pdf/Rent%20Study_Final%20Report_05-26-10.pdf).

HPRP appreciates the opportunity comment on HABC's proposed changes to its FY 2022 Draft Annual Plan. Please feel free to contact me at (410) 685-6589 x20 if I can provide further information or clarification of these comments.

Sincerely,

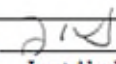
A handwritten signature in black ink, appearing to read "Karen Wabeke". The signature is fluid and cursive, with the first name "Karen" being more prominent than the last name "Wabeke".

Karen Wabeke  
Senior Staff Attorney

cc: Jeannine Dunn, HABC  
Nick Calace, HABC  
Jan Goslee, HABC

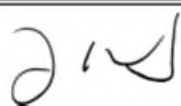


## Appendix K: Lobbying Activities (SF-LLL) Form

<b>NOT APPLICABLE</b> <b>DISCLOSURE OF LOBBYING ACTIVITIES</b> Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See reverse for public burden disclosure.)			Approved by OMB 0348-0046
<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: 4c		<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:	
<b>6. Federal Department/Agency:</b>		<b>7. Federal Program Name/Description:</b>  CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>		<b>9. Award Amount, if known:</b> \$	
<b>10. a. Name and Address of Lobbying Registrant</b> <i>(if individual, last name, first name, MI):</i>		<b>b. Individuals Performing Services</b> <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		Signature: <u></u> Print Name: <u>Janet Abrahams</u> Title: <u>President and Chief Executive Officer</u> Telephone No.: <u>410-396-5504</u> Date: <u>08/18/2021</u>	
<b>Federal Use Only:</b>			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)



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

<b>Certification of Payments to Influence Federal Transactions</b>		OMB Approval No. 2577-0157 (Exp. 11/30/2023)
<small>Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.</small>		
Applicant Name		
Housing Authority of Baltimore City		
Program/Activity Receiving Federal Grant Funding		
Moving to Work Program		
The undersigned certifies, to the best of his or her knowledge and belief, that:		
<div style="display: flex; justify-content: space-between;"><div style="width: 48%;"><p>(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.</p><p>(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.</p></div><div style="width: 48%;"><p>(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.</p><p>This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</p></div></div>		
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. <b>Warning:</b> HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)		
Name of Authorized Official		Title
Janet Abrahams		President and Chief Executive Officer
Signature		Date (mm/dd/yyyy)
		08/18/2021
Previous edition is obsolete		form HUD 50071 (01/14)

## Appendix M: Rental Housing Submarkets and Opportunity Scores

