Before Starting the CoC Application

You must submit all three of the following parts in order for us to consider your Consolidated Application complete:

- 1. the CoC Application,
- 2. the CoC Priority Listing, and
- 3. all the CoC's project applications that were either approved and ranked, or rejected.

As the Collaborative Applicant, you are responsible for reviewing the following:

- 1. The FY 2022 CoC Program Competition Notice of Funding Opportunity (NOFO) for specific application and program requirements.
- 2. The FY 2022 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
- 3. All information provided to ensure it is correct and current.
- 4. Responses provided by project applicants in their Project Applications.
- 5. The application to ensure all documentation, including attachment are provided.

Your CoC Must Approve the Consolidated Application before You Submit It

- 24 CFR 578.9 requires you to compile and submit the CoC Consolidated Application for the FY 2022 CoC Program Competition on behalf of your CoC.
- 24 CFR 578.9(b) requires you to obtain approval from your CoC before you submit the Consolidated Application into e-snaps.

Answering Multi-Part Narrative Questions

Many questions require you to address multiple elements in a single text box. Number your responses to correspond with multi-element questions using the same numbers in the question. This will help you organize your responses to ensure they are complete and help us to review and score your responses.

Attachments

Questions requiring attachments to receive points state, "You Must Upload an Attachment to the 4B. Attachments Screen." Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process. Include a cover page with the attachment name.

- Attachments must match the questions they are associated with—if we do not award points for evidence you upload and associate with the wrong question, this is not a valid reason for you to

appeal HÚD's funding determination.

- We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time).

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1A. Continuum of Care (CoC) Identification

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578; FY 2022 CoC Application Navigational Guide; Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1A-1. CoC Name and Number: MD-501 - Baltimore CoC

1A-2. Collaborative Applicant Name: City of Baltimore - Mayor's Office

1A-3. CoC Designation: CA

1A-4. HMIS Lead: City of Baltimore - Mayor's Office

1B. Coordination and Engagement–Inclusive Structure and Participation

 $\hbox{HUD publishes resources on the HUD.gov website at \ CoC\ Program\ Competition\ to\ assist\ you\ in\ completing\ the\ CoC\ Application.\ Resources\ include:}$

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
 24 CFR part 578;
 FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1B-1.	Inclusive Structure and Participation–Participation in Coordinated Entry.
	NOFO Sections VII.B.1.a.(1), VII.B.1.e., VII.B.1.p., and VII.B.1.r.
	[
	In the chart below for the period from May 1, 2021 to April 30, 2022:
1.	select yes or no in the chart below if the entity listed participates in CoC meetings, voted—including selecting CoC Board members, and participated in your CoC's coordinated entry system; or
2.	select Nonexistent if the organization does not exist in your CoC's geographic area:

	Organization/Person	Participated in CoC Meetings	Voted, Including Electing CoC Board Members	Participated in CoC's Coordinated Entry System
1.	Affordable Housing Developer(s)	Yes	Yes	Yes
2.	Agencies serving survivors of human trafficking	Yes	Yes	Yes
3.	CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
4.	Disability Advocates	Yes	Yes	Yes
5.	Disability Service Organizations	Yes	Yes	Yes
6.	EMS/Crisis Response Team(s)	Yes	Yes	Yes
7.	Homeless or Formerly Homeless Persons	Yes	Yes	Yes
8.	Hospital(s)	Yes	Yes	Yes
9.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tr Organizations)	ibal Nonexistent	No	No
10.	Law Enforcement	Yes	No	No
11.	Lesbian, Gay, Bisexual, Transgender (LGBTQ+) Advocates	Yes	Yes	Yes
12.	LGBTQ+ Service Organizations	Yes	Yes	Yes
13.	Local Government Staff/Officials	Yes	Yes	Yes
14.	Local Jail(s)	No	No	No
15.	Mental Health Service Organizations	Yes	Yes	Yes
16.	Mental Illness Advocates	Yes	Yes	Yes
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17.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes	Yes	Yes
18.	Organizations led by and serving LGBTQ+ persons	Yes	Yes	Yes
19.	Organizations led by and serving people with disabilities	Yes	Yes	Yes
20.	Other homeless subpopulation advocates	Yes	Yes	Yes
21.	Public Housing Authorities	Yes	Yes	Yes
22.	School Administrators/Homeless Liaisons	Yes	Yes	Yes
23.	State Domestic Violence Coalition	Yes	No	Yes
24.	State Sexual Assault Coalition	Yes	No	Yes
25.	Street Outreach Team(s)	Yes	Yes	Yes
26.	Substance Abuse Advocates	Yes	Yes	Yes
27.	Substance Abuse Service Organizations	Yes	Yes	Yes
28.	Victim Service Providers	Yes	Yes	Yes
29.	Domestic Violence Advocates	Yes	Yes	Yes
30.	Other Victim Service Organizations	Yes	Yes	Yes
31.	Youth Advocates	Yes	Yes	Yes
32.	Youth Homeless Organizations	Yes	Yes	Yes
33.	Youth Service Providers	Yes	Yes	Yes
	Other: (limit 50 characters)		•	•
34.	Philanthropic Agencies	Yes	Yes	No
35.	Faith Based Institutions	Yes	Yes	Yes

1B-2.	Open Invitation for New Members.
	NOFO Section VII.B.1.a.(2)
	Describe in the field below how your CoC:
1.	communicated a transparent invitation process annually (e.g., communicated to the public on the CoC's website) to solicit new members to join the CoC;
2.	ensured effective communication with individuals with disabilities, including the availability of accessible electronic formats;
3.	invited organizations serving culturally specific communities experiencing homelessness in the geographic area to address equity (e.g., Black, Latino, Indigenous, LGBTQ+, and persons with disabilities).

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- 1. The CoC invites stakeholders through general solicitation and targeted recruitment to establish CoC general or voting membership. Membership forms are accepted on a rolling basis and no membership fee is collected. The CoC has its own website (journeyhomebaltimore.org), where individuals and agencies can sign up. In addition, the CoC produces a monthly newsletter that goes out to over 1000 subscribers where information about joining the CoC is available, along with updates from the CoC Committees and other ways to participate.
- 2. The membership form is available electronically on the Collaborative Applicant and CoC websites. Information about membership is shared through the CoC's e-newsletter and social media announcements; paper applications are made available when necessary. In addition, all funded CoC and ESG subrecipients are required to participate. The Collaborative Applicant and HMIS Lead website utilizes Drupal software system framework that complies and enforces certain ADA 508 web compliance standards and offers "reasonable accessibility" to people with disabilities.
- Lived Experience Advisory Committee (LEAC) and Youth Action Board (YAB) are formal CoC committees, which are made up of members with current or former lived experience of homelessness. Both the Chairs of the LEAC and YAB sit on the Board. 8 of the 27 dedicated seats on the Board are set aside for individuals with lived experience, which also includes youth and persons that have survived domestic violence. The LEAC and YAB solicit through ongoing community outreach and open invitations to committee meetings. As a way to address equity, the Board provides stipends for people with lived experience and expertise that participate in CoC planning. Ensuring that people with lived experience are compensated for their time reinforces the importance of their participation, supports their time and commitment, and breaks down barriers. Currently the Board is working on fundraising strategies to increase compensation to ensure that people with lived experience have the technology and equipment needed to participate in more virtual meetings. The Governance Committee assesses representation on an annual basis and advertises membership year- round with clear deadlines in advance of voting. The CoC's Race Equity and Governance Committee focuses on targeting organizations using an equity lens to ensure culturally specific communities are included.

1B-3.	CoC's Strategy to Solicit/Consider Opinions on Preventing and Ending Homelessness.
	NOFO Section VII.B.1.a.(3)
	Describe in the field below how your CoC:
1.	solicited and considered opinions from a broad array of organizations and individuals that have knowledge of homelessness, or an interest in preventing and ending homelessness;
2.	communicated information during public meetings or other forums your CoC uses to solicit public information; and
3.	took into consideration information gathered in public meetings or forums to address improvements or new approaches to preventing and ending homelessness.

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1. The CoC solicits opinions from government agencies, nonprofits, homeless service providers, the public, and individuals with lived experience through public, quarterly CoC member and CoC Board meetings. In addition, as part of the governance structure of the CoC there are 6 Action Committees, 4 Capacity Building committees, and a Lived Experience Advisory Committee (LEAC) and Youth Action Board (YAB). All Board meetings are open to the public and include a public comment period. The CoC held community listening sessions and townhalls in 2021 and 2022, and solicited information through public forums and surveys. There are annual public comment periods on the Annual Action Plan, CAPER, CoC Charter, and local Action Plan. The CoC's weekly Lived Experience Advisory Committee and bi-weekly Youth Action Board meetings afford people with lived experience additional platforms to develop recommendations and engage in system planning and decision-making with CoC leadership.

- 2. All quarterly CoC and Board meetings are announced at the beginning of the year and open to the public. With the onset of COVID-19, all meetings moved to virtual platforms, however, most recently the Board and Member meetings are taking place in-person. The CoC leadership, Board, and committees communicate updates during these meetings and publicly share meeting materials on the CoC website and public documents page, via email newsletters, and social media posts. Most committee meetings are open to the public, and agendas and meeting materials are shared online.
- 3. In 2022, MOHS published a Strategic Investment Plan to End Homelessness that was directly informed and guided by robust community engagement activities, which have been intentionally designed to solicit feedback from a diverse group of stakeholders including the CoC, LEAC, YAB, non-profit service providers, and government agencies. The plan focuses on 10 areas of investment, and prioritize the use of key resources provided through the American Rescue Plan Act (ARPA) to support efforts to prevent and end homelessness.

1B-4.	Public Notification for Proposals from Organizations Not Previously Awarded CoC Program Funding.
	NOFO Section VII.B.1.a.(4)
	Describe in the field below how your CoC notified the public:
1.	that your CoC will consider project applications from organizations that have not previously received CoC Program funding;
2.	about how project applicants must submit their project applications-the process;
3.	about how your CoC would determine which project applications it would submit to HUD for funding; and
4.	how your CoC effectively communicated with individuals with disabilities, including making information accessible in electronic formats.

- 1. The CoC notified the public it would accept project applications on August 11, 2022 by posting the RFP, guidelines, and resources on the Collaborative Applicant's (CA) website, social media accounts, and through the CoC mailing list that goes out to over 1,000 subscribers. Subsequent announcements were released to encourage organizations that have not previously received CoC Program funding to apply. The CA hosted a virtual bidder's conference August 15 that was live, recorded and posted to the CA website. The bidder's conference supports both new and renewing applicants on applying by providing an overview of the NOFO, detailed instructions about the local application process, and additional resources to review. The CA also encourages new applicants that have not applied to ask questions via email, where questions and answers are then posted on an FAQ on the website.
- 2. The RFP and guidance includes a checklist of supporting documents and resources to support organizations with submitting their applications. The bidder's conference also provides detailed instructions on how applicants submit their applications. The CA uses an inbox to collect all project applications and supporting documents. Applicants do not submit their applications directly into esnaps, which has eased the process for both renewing and new applicants.
- 3. The CA conducts a threshold review to determine whether proposals meet the HUD and local requirements, and demonstrate consistency with the Consolidated Plan. Applicants are required to provide documentation, such as nonprofit status, certificate of Good Standing, financial audits, and match agreements. The CoC's Resource Allocation Committee scores and ranks new proposals using a rubric that focuses on the project service model and scope, budget, collaboration, capacity, timelines, and system performance. New projects with the highest scores are selected to be included in the ranking based on available funding.
- 4. The CoC ensures information is accessible electronically through the CA website, which uses the Drupal software system framework that complies and enforces certain ADA 508 web compliance standards and offers "reasonable accessibility" to people with disabilities. The webpage designer controls the layout to ensure the website is compatible on different devices. The CA also sets up a helpdesk to support applicants through the competition.

1C. Coordination and Engagement

 $\hbox{HUD publishes resources on the HUD.gov website at \ CoC\ Program\ Competition\ to\ assist\ you\ in\ completing\ the\ CoC\ Application.\ Resources\ include:}$

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;

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- Frequently Asked Questions

1C-1.	Coordination with Federal, State, Local, Private, and Other Organizations.
	NOFO Section VII.B.1.b.
	In the chart below:
1.	select yes or no for entities listed that are included in your CoC's coordination, planning, and operations of projects that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness; or
2.	select Nonexistentif the organization does not exist within your CoC's geographic area.

	Entities or Organizations Your CoC Coordinates with for Planning or Operations of Projects	Coordinates with the Planning or Operations of Projects?
1.	Funding Collaboratives	Yes
2.	Head Start Program	Yes
3.	Housing and services programs funded through Local Government	Yes
4.	Housing and services programs funded through other Federal Resources (non-CoC)	Yes
5.	Housing and services programs funded through private entities, including Foundations	Yes
6.	Housing and services programs funded through State Government	Yes
7.	Housing and services programs funded through U.S. Department of Health and Human Services (HHS)	Yes
8.	Housing and services programs funded through U.S. Department of Justice (DOJ)	Yes
9.	Housing Opportunities for Persons with AIDS (HOPWA)	Yes
10.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	Nonexistent
11.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes
12.	Organizations led by and serving LGBTQ+ persons	Yes
13.	Organizations led by and serving people with disabilities	Yes
14.	Private Foundations	Yes
15.	Public Housing Authorities	Yes
16.	Runaway and Homeless Youth (RHY)	Yes
17.	Temporary Assistance for Needy Families (TANF)	Yes
	Other:(limit 50 characters)	

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18.	
1C-2.	CoC Consultation with ESG Program Recipients.
	NOFO Section VII.B.1.b.
	Describe in the field below how your CoC:
1.	consulted with ESG Program recipients in planning and allocating ESG and ESG-CV funds;
2.	participated in evaluating and reporting performance of ESG Program recipients and subrecipients;
3.	provided Point-in-Time (PIT) count and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area; and
4.	provided information to Consolidated Plan Jurisdictions within your CoC's geographic area so it could be addressed in Consolidated Plan update.

- 1. The Mayor's Office of Homeless Services (MOHS) is the Collaborative Applicant (CA) for the CoC as well as the ESG/HOPWA and ESG-CV Recipient for Baltimore City. MOHS and the CoC's Resource Allocation Committee (RAC) collaborate on all aspects of the ESG allocations process, including evaluating project performance, reviewing funding requests, identifying fiscal year funding priorities, and allocating funds. Under the current CoC governance charter, MOHS consults with the RAC and presents final funding decisions for ESG activities to the CoC Board. ESG-CV funds were dispersed similarly using surveys and modified RFP process to quickly establish need and allocate funding based on CoC priorities to increase housing opportunities and prevent homelessness during the pandemic.
- 2. The CoC and MOHS jointly review HMIS performance data for all ESG and CoC Program subrecipients. The MOHS Program Compliance Department coordinates with HMIS and Fiscal Department to ensure that programs showing a track record of low performance or underspending are identified for technical assistance, training, intervention, additional monitoring, or recommended for reallocation.
- 3. MOHS works directly with the Department of Housing and Community Development (DHCD) in writing the Consolidated plan. All PIT and HIC data approved by the CoC is shared with DHCD through a public report.
- 4. MOHS utilizes CoC feedback, priorities, and data in the development of the Consolidated Plan, Annual Action Plan, and CAPER. The CoC provided detailed information that helped establish the five-year goals for the 2020 Consolidated Plan. In addition, the DHCD Commissioner is an appointed CoC Board member, and CoC, MOHS, and DHCD work together on goals within the Consolidated Plan that aim to ultimately increase the supply of affordable housing and prevent and end homelessness.

1C-3.	Ensuring Families are not Separated.	
	NOFO Section VII.B.1.c.	

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Select yes or no in the chart below to indicate how your CoC ensures emergency shelter, transitional housing, and permanent housing (PSH and RRH) do not deny admission or separate family members regardless of each family member's self-reported sexual orientation and gender identity:

1.	Conducted mandatory training for all CoC- and ESG-funded service providers to ensure families are not separated.	No
2.	Conducted optional training for all CoC- and ESG-funded service providers to ensure families are not separated.	Yes
3.	Worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients.	Yes
4.	Worked with ESG recipient(s) to identify both CoC- and ESG-funded facilities within your CoC's geographic area that might be out of compliance and took steps to work directly with those facilities to bring them into compliance.	No
5.	Sought assistance from HUD by submitting AAQs or requesting technical assistance to resolve noncompliance of service providers.	No
6.	Other. (limit 150 characters)	
	1C-4. CoC Collaboration Related to Children and Youth–SEAs, LEAs, School Districts.	

1C-4. CoC Collaboration Related to Children and Youth–SEAs, LEAs, School Districts.

NOFO Section VII.B.1.d.

Select yes or no in the chart below to indicate the entities your CoC collaborates with:

1.	Youth Education Provider	Yes
2.	State Education Agency (SEA)	Yes
3.	Local Education Agency (LEA)	Yes
4.	School Districts	Yes

1C-4a.	Formal Partnerships with Youth Education Providers, SEAs, LEAs, School Districts.	
	NOFO Section VII.B.1.d.	

Describe in the field below the formal partnerships your CoC has with at least one of the entities where you responded yes in question 1C-4.

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The CoC's Youth Homelessness Action Committee partners with the Mayor's Children's Cabinet that includes youth education providers. The priorities are youth focused and include increasing early childhood development, decreasing food insecurity, decreasing homelessness, increasing literacy, increasing trauma-informed care, increasing diversion practices, and breaking down historical barriers for black and brown youth (specifically boys/young men). The CoC held multiple listening sessions with education partners in the planning and implementation of the YHDP Coordinated Community Plan. Baltimore City has only one LEA that participates in the CoC. The LEA completes presentations on educational service provisions and also collaborates on annual PIT and Youth REACH counts. The LEA trains public school staff on best practices and policies for serving families and young people experiencing homelessness. The LEA coordinates with the CoC to provide resources and toolkits that guide service connections to youth specific services that include diversion. All children in participating programs are eligible to receive services. Individual projects have additional partnerships and programs that serve families and school aged children. The family shelter collaborates with a wide range of youth education providers, connecting youth to Head Start and Early Head Start, after school activities, summer camps, and employment.

Informing Individuals and Families Experiencing Homelessness about Eligibility for Educational Services.	
NOFO Section VII.B.1.d.	

Describe in the field below written policies and procedures your CoC adopted to inform individuals and families who become homeless of their eligibility for educational services.

(limit 2.500 characters)

The primary family shelter operated by St. Vincent de Paul (SVDP) has a dedicated Children's Coordinator staff to educate and inform homeless families about their rights and resources under McKinney Vento, including support for school enrollment, transportation, uniforms, participation in activities, and available fee waivers. All families meet with the Children's Coordinator to assess needs and preferences for school enrollment. The shelter also maintains internal protocols and processes for linking families to Head Start services and early childhood education programs, utilizing the local prioritization process to accommodate homeless families with Head Start and Early Head Start enrollment. The shelter also has on-site day care available to all families. The CoC written standards for ESG and CoC funding require programs serving families to ensure that children are enrolled in school within 48 hours of contact, that the school system is providing transportation either to a new school or school of origin within 7 days, and evaluate whether children are receiving all required McKinney-Vento services. The public-school system disseminates educational posters, resource cards, and toolkits within every school to explain services, resources, and rights. The LEA connects with school social workers to address issues and provides professional development resources.

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1C-4c. Written/Formal Agreements or Partnerships with Early Childhood Services Providers.		
	NOFO Section VII.B.1.d.	

Select yes or no in the chart below to indicate whether your CoC has written formal agreements or partnerships with the listed providers of early childhood services:

		MOU/MOA	Other Formal Agreement
1.	Birth to 3 years	No	No
2.	Child Care and Development Fund	No	No
3.	Early Childhood Providers	No	No
4.	Early Head Start	No	Yes
5.	Federal Home Visiting Program–(including Maternal, Infant and Early Childhood Home and Visiting or MIECHV)	No	No
6.	Head Start	No	Yes
7.	Healthy Start	No	No
8.	Public Pre-K	No	Yes
9.	Tribal Home Visiting Program	No	No
	Other (limit 150 characters)		
10.			

1C-5.	Addressing Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors–Collaborating with Victim Service Providers.	
	NOFO Section VII.B.1.e.	
	Describe in the field below how your CoC regularly collaborates with organizations who help provide housing and services to survivors of domestic violence, dating violence, sexual assault, and stalking to:	
1.	update CoC-wide policies; and	
2.	ensure all housing and services provided in the CoC are trauma-informed and can meet the needs of survivors.	

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1. The CoC's main provider of DV/SA services is House of Ruth Maryland (HRM), who has participated in the CoC since its inception and actively participates in CoC committees and meetings. The representative from HRM, Janice Miller, currently serves as the CoC Board Chair. HRM encourages participation from other local programs, inviting them to discuss how they can be more involved in CoC work, inviting them to partner on their existing CoC grants, and recruiting from among these organizations for the DV Bonus RRH and Victim Coordinated Entry programs. Participation of DV service providers and people with DV and homeless lived experience are written into the CoC Charter and Bylaws, and HRM routinely contributes during the comment period for CoC policies and procedures.

2. The CoC Action Plan, created in 2019, specifically lists steps to address DV survivors within the system and create more trauma informed services and processes throughout the continuum. All contracts issued to CoC funded providers specifically list annual training on trauma and DV as a requirement of funding. Free, self-paced training is offered twice yearly for new staff and providers to recognize and respond to DV in all homeless service settings, and each year, new modules are added for staff who have completed the initial course.

1C-5a.	Annual Training on Safety and Best Practices to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	
	Describe in the field below how your CoC coordinates to provide training for:	
1.	project staff that addresses best practices (e.g., trauma-informed, victim-centered) on safety and planning protocols in serving survivors of domestic violence and indicate the frequency of the training in your response (e.g., monthly, semi-annually); and	
2.	Coordinated Entry staff that addresses best practices (e.g., trauma informed care) on safety and planning protocols in serving survivors of domestic violence and indicate the frequency of the training in your response (e.g., monthly, semi-annually).	

- 1. The CoC's central victim services provider, House of Ruth Maryland (HRM) has a nationally recognized training institute that provides community education, training, consultation and technical assistance to professionals and the community at large on intimate partner violence (IPV), and related issues. All HRM trainings are both practice informed and research informed and make use of experts in the field of IPV. HRM staff are leaders in trauma-informed care (TIC) in Baltimore and provide technical assistance and community trainings to organizations in the following areas:
- The impact of childhood trauma
- Understanding trauma and protecting against secondary trauma
- TIC and voluntary service principles
- Understanding IPV
- Ethical considerations in working with vulnerable population
- Working with abusive partners
- Working with specialized populations such as religious minorities, the LGBTQ community, and non-English speaking clients

Supervisors are provided training and conduct reflective supervision with staff to monitor and address secondary trauma in direct service staff that may also be impacted by trauma. HRM conducts trainings that incorporate all of these tenets and provide consultations to support individualized system change.

2. The CoC has incorporated these principles and practices adopted by HRM into training for all Coordinated Entry staff that provide assessment and navigation services, with an emphasis on developing client crisis and safety plans which include best practices for protecting the confidentiality and protection of clients. Coordinated Entry staff also have protocols in place for consent and information sharing within their HMIS policies. Through the DV Bonus SSO-CE project HRM developed and conducted trainings on Victim Coordinated Entry (VCE) to the CoC, including an asynchronous online training program on recognizing and responding to domestic violence and how to refer survivors to VCE. The training includes referral strategies, how VCE engages and serves homeless survivors in Baltimore City, and how to work effectively with HRM staff to ensure safety and build stability. The asynchronous nature allows staff to complete it as part of their orientation process as they are hired into positions working with vulnerable populations.

1C-5b.	Using De-identified Aggregate Data to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	
		•
	Describe in the field below:	
1.	the de-identified aggregate data source(s) your CoC uses for data on survivors of domestic violence, dating violence, sexual assault, and stalking; and	
2.	how your CoC uses the de-identified aggregate data described in element 1 of this question to evaluate how to best meet the specialized needs related to domestic violence and homelessness.	
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1. House of Ruth Maryland (HRM) runs the parallel Victim Coordinated Entry (VCE) system as part of Baltimore City's HMIS through the DV Bonus fund awarded in FY18 and implemented in 2020. VCE ensures that DV clients are kept confidential in the system, but also allows HRM to produce APR reports into SAGE. HRM has been an active member of the CoC for the last 12 years and has been a prominent provider in Baltimore City since 1977. As the primary victim-centered service provider, HRM currently maintains a stand-alone confidential and comparable database that is only shared through aggregate data reports for CoC and other federal and state funding initiatives. HRM leadership routinely analyzes both aggregate and qualitative data on gender based violence for trends, service needs, and system improvements to benefit survivors. HRM shares this de-identified trend information with the CoC through their active engagement in committees, which incorporate strategies to better serve this vulnerable population.

2. The CoC uses de-identified aggregate data from HRM in conjunction with HMIS and Coordinated Access assessment data to analyze the need for housing and services. The ready availability of data allows the CoC to move quickly on opportunities, like the recent Emergency Housing Voucher allocations, to ensure that appropriate numbers of survivors have access to needed housing services. The CoC's vulnerability assessment, collaboratively created with HRM, includes a number of trauma-related and violence-related risk factors. In addition, the CoC Charter specifies that one Board Member must be from a DV service agency to ensure that the needs of victims are represented at the CoC leadership level. Currently, HRM's Director of Stability Services, serves as the Chair of the CoC Board and staff at HRM are active on a number of CoC committees.

	Communicating Emergency Transfer Plan to Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	
	Describe in the field below how your CoC communicates to all individuals and families seeking or receiving CoC Program assistance:	
1.	the emergency transfer plan policies and procedures; and	
2.	the process for individuals and families to request an emergency transfer.	

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- 1. The CoC has emergency transfer protocols facilitating rapid transfer into alternative housing or confidential facilities using a safety and trauma-informed model that is imbedded into the CoC's Coordinated Access Policies and Procedures. Transfers may be requested for the following reasons:
- •The provider and client feel that another program is better suited to the client's individual needs.
- •The client feels that they are not getting the services they need, or are being treated unfairly by the current housing provider and all attempts to resolve the client's concern without a transfer have been unsuccessful.
- •The client has experienced a change in household composition that can't be accommodated by the current housing provider.
- •There is a significant risk of harm to the client in the current placement
- •The client needs a reasonable accommodation that the provider needs the assistance of a transfer in accommodating.
- •Other issues affecting a current client's placement that will be reviewed on a case-by-case basis.

If a household needs an emergency transfer, providers are required by the CoC to quickly facilitate the household's move, which can include moving outside the jurisdiction of the CoC. Requests for emergency motel or shelter placement on an interim basis are provided. If there is a need to facilitate a transfer between programs for a client, the CoC prioritizes cases that are safety-related. DV-related emergency transfers are typically resolved within 24 hrs. This policy is communicated to the general CoC membership annually in September. The Victim Coordinated Entry staff also are trained on the policy so that they can advise individual victims and DV/SA programs as needed.

2. Clients can initiate a transfer request by completing the Client Transfer Request Form within the Coordinated Access Policies and Procedures. A client may request a transfer through their current housing provider or by directly contacting the Mayor's Office of Homeless Services (MOHS). Clients are matched through Coordinated Access, and may be matched to multiple types of housing programs funded by different federal, state, and local grants. Clients that wish to transfer will be notified about the different programs, and will be able to accept or decline the offer. Providers do not need MOHS approval before making emergency accommodations in the interest of a client's safety.

1C-5d.	Access to Housing for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section VII.B.1.e.	

Describe in the field below how your CoC ensures that survivors of domestic violence, dating violence, sexual assault, or stalking have access to all of the housing and services available within the CoC's geographic area.

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A parallel Victim Coordinated Entry (VCE) system ensures that victims who do not wish to be listed in the shared HMIS have a secure, VAWA compliant way to be triaged, assessed and connected with both DV specific and non-DV services. VCE staff are trained to enter placeholder data into the main Coordinated Entry system to ensure that households experiencing both IPV and homelessness have access to PSH programs. The CoC used system data to allocate emergency housing vouchers to DV victims in proportion to the need in the CoC. Similarly, CARES act and ARA funding opportunities were specifically marketed to local DV service providers and their projects ensured that IPV victims had access to trauma specific eviction prevention, rapid rehousing and shelter programs during the last two years of the COVID-19 pandemic. The main DV provider, House of Ruth Maryland, works with CoCs and victim service providers across Maryland to transfer vouchers and place victims outside of the jurisdiction to protect safety of victims and increase housing placement and stability.

1C-5e.	Including Safety, Planning, and Confidentiality Protocols in Coordinated Entry to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	
		•
	Describe in the field below how your CoC's coordinated entry includes:	
1.	safety protocols,	
2.	planning protocols, and	
3.	confidentiality protocols.	

- 1. The CoC engages and coordinates with both CoC and ESG funded victim service providers. A parallel Victim Coordinated Entry (VCE) system was implemented in 2020 to prioritize referrals and ensure victim safety. Beginning in 2020 and continuing annually, Coordinated Entry (CE) service providers are trained on best practices in engaging survivors and safety planning. The CoC increased investment in tenant-based housing projects to maximize client choice and ensure client safety. Households can receive multiple housing matches through CE, and can decline matches without penalty. Households self-identifying as fleeing DV are informed of their rights to request housing units outside of the CoC's jurisdiction, and the CoC has trained providers with TBRA and SBRA on allowances for tenant mobility.
- 2. The CoC regularly uses data provided by the Housing Inventory County, Point in Time Count, and House of Ruth Maryland (HRM) to determine the level of need and plan for resources to meet this need. This planning process has resulted in DV specific eviction prevention programming, DV specific rapid rehousing programming and an allocation of Emergency Housing Vouchers for DV victims. The CoC incorporates victim safety into all policies and procedures, for example mandating confidentiality in the HMIS, transfer protocols that prioritize DV victims, a referral process to HRM from the main shelter line, outreach protocols for when staff encounter a victim of DV, and contracts that require DV and trauma training.
- 3. The CoC maintains a stand-alone VCE system and HMIS operated by House of Ruth Maryland (HRM). No protected client information is released without express written permission. Clients assessed through non-DV providers can use anonymous names or client identifiers during the entire span of assessment and placement. Households assessed by HRM are maintained on a separate, de-identified by-name list outside of HMIS. Placeholder client ID numbers are used in the City HMIS to ensure access to RRH and PSH placements. Protections for confidentiality are built into the Charter and Bylaws, HMIS standards, and standard operating procedures for the CoC.

1C-6.	Addressing the Needs of Lesbian, Gay, Bisexual, Transgender and Queer+–Anti-Discrimination Policy and Training.		
	NOFO Section VII.B.1.f.		
1.	Did your CoC implement a written CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination?		Yes
2.	2. Did your CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?		Yes
3.	3. Did your CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs (Gender Identity Final Rule)?		Yes
1C-6a	a. Anti-Discrimination Policy–Updating Policies–Assisting Providers–Evaluating Compliance–Addressing Noncompliance.		
	NOFO Section VII.B.1.f.		
	Describe in the field below:		
1	whether your CoC updates its CoC-wide anti-discrimination policy, as necessary, based on stakeholder feedback;		

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	how your CoC assisted providers in developing project-level anti-discrimination policies that are consistent with the CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination;
3.	your CoC's process for evaluating compliance with your CoC's anti-discrimination policies; and
4.	your CoC's process for addressing noncompliance with your CoC's anti-discrimination policies.

- 1. All shelters and housing programs must be compliant with federal, state, and local laws in the delivery of their services and housing projects, which include ensuring equal opportunity and access to housing for protected class statuses. The CoC in partnership with the Mayor's Office of Homeless Services (MOHS) and the Mayor's Office LGBTQ Affairs have joint commitment to protecting and supporting the rights to ensure ensuring that all LGBTQ+ individuals experiencing homelessness have equal access to safe shelter and housing. The CoC has a dedicated Race Equity Committee that is committed to review and reform practices and policies to address and rectify racial disparities and to anti-discrimination policies remain consistent with the values of the CoC's.
- 2. The Baltimore City CoC participates in statewide training opportunities offered by the Maryland State Department of Housing and Community Development. Most recently, training that was presented by DHCD and the Homeless Persons Representation Project focused on HUD's Equal Access Rule, which requires equitable access to homeless services for clients that identify as LGBTQ+.
- 3. All programs are monitored and evaluated for compliance with fair housing laws and anti-discrimination policies. Projects are required to submit their agency's non-discrimination policies to MOHS annually for review.
- 4. MOHS as the recipient of funds, reserves the right to require sub-recipients to change program policies or requirements that may unnecessarily limit access to housing and, or violate anti-discrimination policies. If a project is found in violation of anti-discrimination policies, MOHS will provide a formal request for corrective action. The project will have time to respond and to remedy the violation. However, if an agency is unable to comply, MOHS will notify the CoC's Resource Allocation Committee and the project may be terminated due to a breach of their contract.

1C-7.	Public Housing Agencies within Your CoC's Geographic Area–New Admissions–General/Limited Preference–Moving On Strategy.	

NOFO Section VII.B.1.g.

You must upload the PHA Homeless Preference\PHA Moving On Preference attachment(s) to the 4B. Attachments Screen.

Enter information in the chart below for the two largest PHAs highlighted in gray on the FY 2021 CoC-PHA Crosswalk Report or the two PHAs your CoC has a working relationship with—if there is only one PHA in your CoC's geographic area, provide information on the one:

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Public Housing Agency Name	Enter the Percent of New Admissions into Public Housing and Housing Choice Voucher Program During FY 2021 who were experiencing homelessness at entry	Does the PHA have a General or Limited Homeless Preference?	Does the PHA have a Preference for current PSH program participants no longer needing intensive supportive services, e.g., Moving On?
Housing Authority of Baltimore City (HABC)	15%	Yes-Both	No

1C-7a.	Written Policies on Homeless Admission Preferences with PHAs.	
	NOFO Section VII.B.1.g.	
·		
	Describe in the field below:	
1.	steps your CoC has taken, with the two largest PHAs within your CoC's geographic area or the two PHAs your CoC has working relationships with, to adopt a homeless admission preference—if your CoC only has one PHA within its geographic area, you may respond for the one; or	
	state that your CoC has not worked with the PHAs in its geographic area to adopt a homeless admission preference.	

The Baltimore City CoC works in collaboration with the Housing Authority of Baltimore City (HABC) to provide a Limited Preferences for people experiencing homelessness in a set amount of set-aside Section 8 vouchers. HABC is the only public housing authority within the geographic area covered by the CoC. Many of these vouchers are used in collaboration with CoC funded supportive services funding to create additional Permanent Supportive Housing capacity. The relationship between the CoC and the local housing authority is outlined in Memorandums of Understanding. There is a total of 919 homeless set-aside vouchers that comprise of dedicated tenant-based and dedicated project-based units requiring case management in addition to prioritized referrals for individuals, families with children, and veterans experiencing homelessness for Section 8 and project-based vouchers. Additionally, the CoC partners with HABC to house up to 250 citizens returning to society from incarceration through tenant-based vouchers. In FY 2021, the CoC and HABC entered into an MOU to prioritize 278 Emergency Housing Vouchers to prioritize individuals and families that were experiencing homelessness or at-risk of homelessness. These vouchers were also coupled with additional funds to provide support services that included costs related to move-in costs. In total, HABC has partnered with CoC to provide assistance by setting aside 1,447 vouchers. To ensure households were provided with support services, MOHS Finally, the CoC has partnered with HABC to dedicate several Section 8 (tenant-based homeless set-aside vouchers) and 50 Public Housing units to the Medicaid Pilot (ACIS) project, so that Medicaid dollars can provide supportive services.

1C-7b.	Moving On Strategy with Affordable Housing Providers.	
	Not Scored–For Information Only	
	Select yes or no in the chart below to indicate affordable housing providers in your CoC's jurisdiction that your recipients use to move program participants to other subsidized housing:	

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1.	Multifamily assisted housing owners	No
2.	РНА	No
3.	Low Income Housing Tax Credit (LIHTC) developments	No
4.	Local low-income housing programs	No
	Other (limit 150 characters)	
5.		

1C-7c.	Include Units from PHA Administered Programs in Your CoC's Coordinated Entry.	
	NOFO Section VII.B.1.g.	

In the chart below, indicate if your CoC includes units from the following PHA programs in your CoC's coordinated entry process?

1.	Emergency Housing Vouchers (EHV)	Yes
2.	Family Unification Program (FUP)	Yes
3.	Housing Choice Voucher (HCV)	Yes
4.	HUD-Veterans Affairs Supportive Housing (HUD-VASH)	Yes
5.	Mainstream Vouchers	No
6.	Non-Elderly Disabled (NED) Vouchers	Yes
7.	Public Housing	No
8.	Other Units from PHAs:	

1C-7d.	Submitting CoC and PHA Joint Applications for Funding for People Experiencing Homelessness.	
	NOFO Section VII.B.1.g.	

	Did your CoC coordinate with a PHA(s) to submit a competitive joint application(s) for funding or jointly implement a competitive project serving individuals or families experiencing homelessness (e.g., applications for mainstream vouchers, Family Unification Program (FUP), other programs)?	No
		Program Funding Source
2.	Enter the type of competitive project your CoC coordinated with a PHA(s) to submit a joint application for or jointly implement.	

Coordinating with PHA(s) to Apply for or Implement HCV Dedicated to Homelessness Including Emergency Housing Voucher (EHV).	
NOFO Section VII.B.1.g.	

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Did Voi Pla	I your CoC coordinate with any PHA to apply for or implement funding provided for Housing Choice uchers dedicated to homelessness, including vouchers provided through the American Rescue in?	Yes
1C-7e.1.	List of PHAs with Active MOUs to Administer the Emergency Housing Voucher (EHV) Program.	
	Not Scored–For Information Only	
		_
Does EHV	s your CoC have an active Memorandum of Understanding (MOU) with any PHA to administer the Program?	Yes
		_
	u select yes to question 1C-7e.1., you must use the list feature below to enter the name of every your CoC has an active MOU with to administer the Emergency Housing Voucher Program.	
PHA		•
Housing Authority		

1C-7e.1. List of PHAs with MOUs

Name of PHA: Housing Authority of Baltimore City (HABC)

1D. Coordination and Engagement Cont'd

10	-1. Discharge Planning Coordination.	
	NOFO Section VII.B.1.h.	
	Select yes or no in the chart below to indicate whether your CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are n discharged directly to the streets, emergency shelters, or other homeless assistance program	not
1. Foster Care	Y	'es
2. Health Care	Y	'es
3. Mental Health Care	Y	'es
4. Correctional Facilities	N	lo
10	-2. Housing First–Lowering Barriers to Entry. NOFO Section VII.B.1.i.	
112		
	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinate entry, Safe-Haven, and Transitional Housing projects your CoC is applying for in FY 2022 CoC Program Competition.	ad 38
	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinate entry, Safe-Haven, and Transitional Housing projects your CoC is applying for in FY 2022 CoC Program Competition that have adopted the Housing First approach.	ed 38
	This number is a calculation of the percentage of new and renewal PSH, RRH, SSO non-Coordina Entry, Safe-Haven, and Transitional Housing projects the CoC has ranked in its CoC Priority Listir he FY 2022 CoC Program Competition that reported that they are lowering barriers to entry and prioritizing rapid placement and stabilization to permanent housing.	
1D-	2a. Project Evaluation for Housing First Compliance.	
	NOFO Section VII.B.1.i.	
	Describe in the field below:	
	how your CoC evaluates every recipient—that checks Housing First on their Project Applicatio determine if they are actually using a Housing First approach;	n–to
	2. the list of factors and performance indicators your CoC uses during its evaluation; and	
	3. how your CoC regularly evaluates projects outside of the competition to ensure the projects a using a Housing First approach.	re

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- 1. All CoC and ESG-funded projects musts sign an agreement confirming that their project will operate using a Housing First approach, and then this language is explicitly outlined in the final executed contract with the subrecipients operating the project. The Program Compliance Department of the Mayor's Office of Homeless Services (Collaborative Applicant) that evaluates and monitors all CoC and ESG-funded projects conducts extensive monitoring to ensure projects are adhering to Housing First principals.
- 2. All projects are monitored and evaluated by the Collaborative Applicant to ensure that a Housing First approach is prioritized in rapid placement and stabilization. All providers must certify that the housing projects comply with the Housing First Principles and are evaluated to ensure that access to programs is not contingent on sobriety, minimum income, lack of a criminal record, completion of treatment, participation in services, or other unnecessary conditions. In addition, the program must be able to demonstrate that they quickly move residents to permanent housing and individuals are not terminated due to a failure to participate in supportive services, progress on service plans, loss of income or failure to increase income, and, or being a victim of domestic violence.
- 3. All CoC and ESG- funded projects are evaluated and monitored annually by the Collaborative Applicant. Projects also must have a grievance and termination policies in place that are reviewed. The Resource Allocation Committee's scoring and ranking tool used to evaluate renewal and new projects includes confirming that there is signed Housing First Certification on record. CoC will be working on additional measures to ensure that our community continuously evaluates Housing First by reviewing CoC policies and data

1D-3.	Street Outreach—Scope.
	NOFO Section VII.B.1.j.
	Describe in the field below:
1.	your CoC's street outreach efforts, including the methods it uses to ensure all persons experiencing unsheltered homelessness are identified and engaged;
2.	whether your CoC's Street Outreach covers 100 percent of the CoC's geographic area;
3.	how often your CoC conducts street outreach; and
4.	how your CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance.

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- 1. The CoC has 3 providers with Outreach teams that canvass and respond to calls throughout the city. Outreach workers are trained to provide streamlined and equitable access to service referrals, shelter, and housing assistance. Regardless of where someone first seeks services, access is based on vulnerability, eligibility, and choice. There are processes in place for subpopulations that includes, adults, families with children, unaccompanied youth (18-24), and households fleeing DV. The 3 outreach teams meet bi-weekly to share resources and coordinate care through case conferences. The outreach teams also have roles and special competency, such as access to clinical treatment, SOAR, crisis response, health/safety services, and serving special populations such as the LGBTQ+ and Hispanic community. Additionally, MOHS leads the Hands in Partnership meeting, which is a larger group of homeless outreach advocates that meet monthly in a confidential forum to identify individuals, discuss resources and ultimately works towards engaging persons experiencing unsheltered homelessness.
- 2. Covers 100% of the CoC's geographic area.
- 3. Services are primarily offered Monday -Friday between 6am -4:30pm, with extended winter shelter hours to include weekend coverage. A number of programs operate after hours and on weekends.
- 4. Outreach serves people who are least likely to request assistance, such as individuals and families with DV experience, significant trauma, chronic homelessness, non-English speakers, and co-occurring SMI/SUD. Teams with integrated behavioral health services are assigned to connect with individuals with SMI/SUD. Teams conduct outreach daily, provide transportation, and are equipped with wheelchair-accessible vehicles. Teams are trained to connect with non-English speaking clients with services, and either have a Spanish speaking outreach worker or interpreter services. At the beginning of the pandemic, MOHS partnered with providers to bring mobile showers and encampment meal services to harder to reach individuals to ensure basic needs were being met since many drop-in/resource centers were not providing inhouse services. The need and demand for mobile services was highlighted during the pandemic, and is now a primary low- barrier service option for people experiencing unsheltered homelessness. This strategy has strengthened the relationships between Outreach workers and the unsheltered population; thus, increasing the acceptance of housing.

1D-4. Strategies to Prevent Criminalization of Homelessness.		
	NOFO Section VII.B.1.k.	

Select yes or no in the chart below to indicate strategies your CoC implemented to ensure homelessness is not criminalized and to reverse existing criminalization policies in your CoC's geographic area:

		Ensure Homelessness is not Criminalized	Reverse Existing Criminalization Policies
1.	Engaged/educated local policymakers	Yes	Yes
2.	Engaged/educated law enforcement	Yes	Yes
3.	Engaged/educated local business leaders	Yes	Yes
4.	Implemented community wide plans	Yes	Yes
5.	Other:(limit 500 characters)		

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1D-5.	Rapid Rehousing–RRH Beds as Reported in the Housing Inventory Count (HIC).	
	NOFO Section VII.B.1.I.	

	2021	2022
Enter the total number of RRH beds available to serve all populations as reported in the HIC–only enter bed data for projects that have an inventory type of "Current."	352	538

1D-6. Mainstream Benefits–CoC Annual Training of Project Staff.		
	NOFO Section VII.B.1.m.	

Indicate in the chart below whether your CoC trains program staff annually on the following mainstream benefits available for program participants within your CoC's geographic area:

		CoC Provides Annual Training?
1.	Food Stamps	Yes
2.	SSI–Supplemental Security Income	Yes
3.	TANF-Temporary Assistance for Needy Families	Yes
4.	Substance Abuse Programs	Yes
5.	Employment Assistance Programs	Yes
6.	Other (limit 150 characters)	

1D-6a.	Information and Training on Mainstream Benefits and Other Assistance.
	NOFO Section VII.B.1.m
	Describe in the field below how your CoC:
1.	systemically provides up-to-date information on mainstream resources available for program participants (e.g., Food Stamps, SSI, TANF, substance abuse programs) within your CoC's geographic area;
2.	works with project staff to collaborate with healthcare organizations, including substance abuse treatment and mental health treatment, to assist program participants with receiving healthcare services; and
3.	works with projects to promote SSI/SSDI Outreach, Access, and Recovery (SOAR) certification of program staff.

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1. The CoC's committees bring key mainstream benefit system leaders together to develop comprehensive strategies and communication materials to increase enrollment in health insurance coverage, TANF, SSI, food stamps, childcare vouchers, mental health and substance use treatment services, VA benefits, disability-related services, and workforce development/employment navigation.

- 2. All CoC funded projects are required to assist clients in accessing and maintaining benefits that include health, mental health, and behavioral health needs. Projects are also encouraged to partner with healthcare organizations for in-kind match services that ultimately enhance program supports and service delivery. CoC collaborates with the Central Maryland Access Point for enrolling in qualified health plans and Medicaid. CoC funded projects complete assessments and care plans to include referrals to specialists and health care providers that include access to philanthropic health care benefits such as dental.
- 3. The CoC partners with Healthcare for the Homeless, the local SOAR lead to ensure that programs are trained or know how to access SOAR technical assistance on behalf of their clients. The CoC has implemented the Assistance in Community Integrative Services (ACIS) Pilot Program that covers the cost of tenancy-based case management services and housing case management services to Medicaid beneficiaries. Currently 98% of the 200 households in the ACIS program have retained housing. The goal of ACIS is to engage clients in housing and supportive services to reduce unnecessary health services utilization or costly institutionalization.

1D-7. Increasing Capacity for Non-Congregate Sheltering.

NOFO Section VII.B.1.n.

Describe in the field below how your CoC is increasing its capacity to provide non-congregate sheltering.

Baltimore City moved to operating non-congregate shelters with the onset of the Pandemic in 2020, and continues to operate 2 non-congregate emergency shelters for men and women. The switch from congregate to non-congregate shelter has been an ongoing response to the COVID-19 pandemic to prevent the spread of COVID-19 and other infectious diseases, specifically among highly vulnerable individuals with chronic health conditions that increase their risk for serious complications or death from COVID-19.

Through City's Strategic Investment Plan, the community has determined that emergency interim housing, such as non-congregate shelter is a high priority. MOHS with support of the CoC is moving forward to purchase 2 hotels using American Rescue Plan Act (ARPA) funds to ensure non-congregate shelters are a permanent fixture within emergency services in Baltimore City. With the purchase of hotels, we estimate that we will create 275 non-congregate shelter beds within our system that would replace congregate shelter beds. Investment in permanent non-congregate shelter with high-quality, housing focused case management services is critical to ensure the continued safety of people experiencing homelessness. It provides safe, dignified temporary housing in a trauma-informed setting; allowing individuals to participate in the re-housing and case management process, which having a stable place to rest, meet basic needs, and store personal belongings without fear of interference. In addition to the personal benefits of a non-congregate care model, the use of noncongregate models has increased participation in case management, and significantly reduced interpersonal conflict between staff and residents, and decreased utilization of emergency services. A shift to non-congregate models decrease the length of time homeless and improve housing outcomes. At the beginning of the pandemic over 500 clients were identified and relocated across 5 hotels/motels sites to increase social distancing. Coordination with health services and case management allowed for households to also quickly get connected to housing assistance which resulted in 314 households moving into permanent housing.

ID-8. Partnerships with Public Health Agencies—Collaborating to Respond to and Prevent Spread of Infectious Diseases.	
	NOFO Section VII.B.1.o.
	Describe in the field below how your CoC effectively collaborates with state and local public health
	agencies to:
1.	agencies to: develop CoC-wide policies and procedures to respond to infectious disease outbreaks; and

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- 1. The Baltimore City Health Department Office of Public Health Preparedness and Response is committed to preparing Baltimore City for public health emergencies such as large-scale disease outbreaks, bioterror events, and other emergencies with an impact on the health of the community. The Mayor's Office of Homeless Services (MOHS) and CoC Providers participate in trainings to assist with future preparation and readiness for public health emergencies. The CoC has recorded the necessary planning steps to initiate CoC-wide policies and procedures to respond to public health emergencies. The policies will include details on site relocations, collaboration with City agencies, hospital and community health partners, transportation resources, supply logistics, public health resources, staffing resources, HR support, equipment needs, and communication strategies.
- 2. The City of Baltimore has committed \$90.4 million through the American Rescue Plan Act (ARPA) to implement best practices from its COVID-19 emergency housing response as a model for its long-term response to homelessness. This is the largest investment, and will support the CoC's goal of ending homelessness through 5 key strategies that include permanent housing development, diversion and rapid resolution, rapid re-housing investments, noncongregate shelters, and housing navigation/landlord engagement. The CoC continues to collaborate with a number of external partnerships to meet the populations needs and decrease the spread of COVID-19 and other infectious diseases. Although the immediate public health emergency due to COVID-19 is decreasing, the CoC continues to work closely with MOHS and City leadership to adjust strategies for managing other public health emergencies. Protocols were established and implemented using CDC guidelines to ensure safety of people living in unsheltered and congregate settings. CoC and MOHS worked on procedures on sharing information that included hiring a Public Information Officer. The City improved hiring process to quickly onboard subject matter experts and consultants to ensure the City has capacity to respond to the public health crisis and support the provider network using best practices. Additional trainings were identified for mid-level and executive level leadership to ensure emergency protocols were implemented.

ID-8a.	Collaboration With Public Health Agencies on Infectious Diseases.
	NOFO Section VII.B.1.o.
	Describe in the field below how your CoC effectively equipped providers to prevent or limit infectious disease outbreaks among program participants by:
1.	sharing information related to public health measures and homelessness, and
2.	facilitating communication between public health agencies and homeless service providers to ensure street outreach providers and shelter and housing providers are equipped to prevent or limit infectious disease outbreaks among program participants.

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- 1. The CoC moved all meetings to virtual platforms, and updated their governance charter to include information on how to hold virtual meetings and voting in a virtual setting. The CoC has Communications Fellow that manages CoC's newsletters that go out to over 1000 subscribers monthly, which is the primary source of how information is shared. The Communications Fellow also manages the CoC's social media platforms as another way to share resources and information. At the beginning of the pandemic there were weekly provider calls were set up to ensure homeless service providers had up to date information. In addition, the Lived Experience Advisory Committee and Youth Action Board were invited to participate in the COVID-19 Ambassadors program to encourage individuals who are vaccine hesitant to get the vaccine. Vaccine Ambassadors were employed by the Baltimore City Health Department program and communicated the benefits of the vaccine to help individuals make informed decisions.
- 2. The CoC continues to coordinate with mainstream health providers, Baltimore City Health Department, and Health Care for the Homeless (HCH) to share information about preventing or limiting the spread of infectious disease. The public information officer at MOHS coordinates information with the Communications fellow at the CoC to ensure important updates or resources are widely shared through the newsletter or social media. During the pandemic, there were weekly provider calls that ensured information was being communicated between the public health agencies and homeless services providers. Although the calls are no longer happening weekly, information is still being communicated through the CoC's formal committee meetings as necessary.

1D-9. Centralized or Coordinated Entry System–Assessment Process.		
NOFO Section VII.B.1.p.		
	Describe in the field below how your CoC's coordinated entry system:	
1.	covers 100 percent of your CoC's geographic area;	
2.	uses a standardized assessment process; and	
3.	is updated regularly using feedback received from participating projects and households that participated in coordinated entry.	

- 1. The Baltimore City's Coordinated Entry System, known as Coordinated Access System (CAS) covers 100 percent of the CoC's geographic area. Since 2019, the assessment tool is built into the HMIS to ensure individuals in need of assistance are quickly assessed and ranked according to vulnerability and matched to the first appropriate permanent housing option available, including both CoC and non-CoC funded housing units.
- 2. CAS is the centralized intake process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs. Baltimore's CoC developed a modified assessment tool modeled after the SPDAT to prioritize the most vulnerable individuals in need of assistance. The modified assessment was to ensure that the diverse population of clients served are equitably assessed and prioritized for housing.
- 3. Baltimore's CAS is governed by the CoC's Homeless Response System (HRS) Committee. The HRS Committee is chaired by a CoC Board Member and the group is made up of individuals with lived experience and expertise. homeless service providers and outreach workers, community advocates, and the Mayor's Office of Homeless Services as the HMIS and Coordinated Access lead. The meetings are conducted bi-weekly, and opportunities to address system policies and procedures are ongoing. The committee is focused on enhancing the system with technical support from Built for Zero, connecting homelessness prevention and diversion programs to the system, reviewing the system-wide outreach strategy, reviewing the standards of care and training, and analyzing system data through a racial equity lens. Through the HRS Committee feedback, the CAS has incorporated a number of assessment tools to prioritize vulnerable individuals. During the COVID-19 pandemic the HRS committee quickly moved to adjust the prioritization and used a COVID-19 risk factor assessment to quickly match vulnerable individuals to housing. With the introduction of YHDP projects, the HRS Committee adapted the TAY VI SPADT based on feedback from the Youth Action Board and Youth Homelessness Committee.

	Program Participant-Centered Approach to Centralized or Coordinated Entry.	
	NOFO Section VII.B.1.p.	
	Describe in the field below become Octo	
	Describe in the field below how your CoC's coordinated entry system:	
	reaches people who are least likely to apply for homeless assistance in the absence of special outreach;	
2.	prioritizes people most in need of assistance;	
	ensures people most in need of assistance receive permanent housing in a timely manner, consistent with their preferences; and	
	takes steps to reduce burdens on people using coordinated entry.	

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- 1. Coordinated Access Navigators are service providers trained to use a person-centered approach while assisting individuals and families experiencing homelessness with submitting a Vulnerability Assessment and gathering the necessary documentation needed to complete formal housing applications. Navigators are situated throughout the City and serve as an access point for the system. These access points are affirmatively marketed to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability or who are least likely to complete a Coordinated Access System Assessment in the absence of special outreach. The list of navigators can be found on the Mayor's Office of Homeless Services website and is also published in the Street Outreach Card. The navigator teams consist of mobile teams, Emergency Shelter access points, and drop-centers that cover all of Baltimore City to assist with navigating and referring people most in need of assistance.
- 2. The Coordinated Access System prioritizes people most in need of assistance through the use of a vulnerability assessment that matches people with the highest vulnerabilities to housing and services.
- 3. The CoC conducts weekly case conferencing that is split between different subpopulations that include veterans, youth, families, and people experiencing unsheltered homelessness. The addition to case conferencing ensures that a review of the By-Name List is evaluated to ensure that households receive assistance in a timely manner and are consistent with their preferences. Case conferencing allows providers to troubleshoot barriers that can assist with moving people through the system quicker. The CoC is specifically working with technical experts, Built for Zero to enhance our system.
- 4. The Coordinated Access Policies and Procedures are reviewed annually to determine how to ensure the referral system is simple and fast. The HRS Committee has advocated to reduce documentation and eligibility requirements where they are not necessary.

11	D-10.	Promoting Racial Equity in Homelessness–Conducing Assessment.	
		NOFO Section VII.B.1.q.	
1	. Has	s your CoC conducted a racial disparities assessment in the last 3 years?	No
2	. Ente	er the date your CoC conducted its latest assessment for racial disparities.	06/01/2019

	Describe in the field below:
1.	your CoC's process for analyzing whether any racial disparities are present in the provision or outcomes of homeless assistance; and
2.	what racial disparities your CoC identified in the provision or outcomes of homeless assistance.

NOFO Section VII.B.1.q.

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- 1. The CoC's process for analyzing racial disparities are reviewed through an analysis current federal and local performance measures, patterns of housing placement by neighborhood, utilization of the HUD racial disparities tool, and other relevant data sources to identify and understand racial disparities and intersections with gender, sexual orientation, language, and other relevant characteristics. The numbers of African Americans or Black individuals seeking homeless assistance is overwhelming, as people of color experience homelessness at significantly greater rates, even when controlling for poverty. With the use of the HUD CoC Racial Equity Analysis Tool, our own system demonstrated that 74% of individuals and 86% of families with children are experiencing homelessness compared to the 62% of the total population that identify as African American or Black. MOHS, the HMIS lead has a System's Overview Dashboard that is publicly available. The dashboard gives aggregate information on all persons experiencing homelessness in Baltimore City's CoC. The dashboard is broken down to the following areas, system overview, emergency shelter, street outreach, rapid re-housing, permanent supportive housing, transitional housing, safe haven, and coordinated entry.
- 2. The data reviewed in our CoC is consistent with individuals that identify as African American or Black accessing permanent supportive and rapid rehousing at a higher rate than other demographics. However, this also confirms that racial disparities exist in our system because of the overwhelming number of African American or Black individuals reflected within the homelessness system.

1D-10b.	Strategies to Address Racial Disparities.	
	NOFO Section VII.B.1.q.	

Select yes or no in the chart below to indicate the strategies your CoC is using to address any racial disparities.

1.	The CoC's board and decisionmaking bodies are representative of the population served in the CoC.	No
2.	The CoC has identified steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC.	Yes
3.	The CoC is expanding outreach in geographic areas with higher concentrations of underrepresented groups.	Yes
4.	The CoC has communication, such as flyers, websites, or other materials, inclusive of underrepresented groups.	Yes
5.	The CoC is training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness.	Yes
6.	The CoC is establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector.	Yes
7.	The CoC has staff, committees, or other resources charged with analyzing and addressing racial disparities related to homelessness.	Yes
8.	The CoC is educating organizations, stakeholders, boards of directors for local and national nonprofit organizations working on homelessness on the topic of creating greater racial and ethnic diversity.	Yes
9.	The CoC reviewed coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness.	Yes
10.	The CoC is collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system.	Yes

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COC REG 2022 192153

MD-501 CoC Project: MD-501 CoC Registration FY 2022

	The CoC is conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness.	Yes
	Other:(limit 500 characters)	
12.		

1D-10c.	Actions Taken to Address Known Disparities.	
	NOFO Section VII.B.1.q.	

Describe in the field below the steps your CoC and homeless providers have taken to address disparities identified in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

The CoC's Race Equity Committee was established to revise data collection strategies, provide training and technical assistance, and reform practices and policies to address and rectify racial disparities. This includes ensuring people of color have appropriate representation, decision-making authority, and avenues for professional development. The Homeless Response System (HRS) Committee reviews system wide data on racial disparities by program type including analysis of performance outcomes by race to determine whether there are disparities in measures such as the number of days between entry to Coordinated Access and initial housing offer, the length of time homeless, and rates of return to homelessness. HRS and the Homeless Persons Representation Project (HPRP) is specifically evaluating reports of criminal record barriers to housing since the criminal justice system disproportionately affects communities of color.

CoC members were instrumental in the creation of the Docket for Homeless Persons, which is a specialized court docket in the District Court for individuals experiencing homelessness who have been accused of nonviolent misdemeanors or who currently have outstanding warrants for misdemeanors and traffic offenses. The individuals work with service providers to address underlying needs that led to the arrest. Cases are typically diverted for up to 90 days after which the charges are not prosecuted by the State's Attorney (SA) and then expunged. The SA's Office has implemented new policies ceasing prosecution of certain low-level offenses many of which have historically been charged and prosecuted against individuals experiencing homelessness (i.e. open container, urinating in public, CDS possession, prostitution). 78% of the arrests averted under the new no-prosecution policy were averted among Black individuals published in a report by Johns Hopkins School of Public Health. With the investment of \$90.4 million in Homeless Services through the American Rescue Plan Act (ARPA), there are a number of interventions that will look to mitigate/decrease existing and historical disparities such as locating and securing affordable housing units in racially desegregated neighborhoods to ensure households have extensive choice and can relocate to neighborhoods of opportunity. Additionally, recruiting female and BIPOC landlords to ensure housing subsidies are not going solely to large/or white-owned property holding companies.

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1D-10d. Tracking Progress on Preventing or Eliminating Disparities.

NOFO Section VII.B.1.q.

Describe in the field below the measures your CoC has in place to track progress on preventing or eliminating disparities in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

- 1.Strengthening the CoC's ability to monitor the homeless response system will support work around racial equity. Black and African American people continue to disproportionally represent Baltimore's neighbors experiencing homelessness. This year, the CoC convened the Race Equity Action Committee to develop practices and policies to address and rectify this racial disparity, using data to guide its work. In order to track progress on preventing or eliminating disparities the Race Equity Committee has committed to the following strategies:
- •Complete an initial review of existing data to understand racial disparities and intersections with gender and sexual orientation.
- •Reform data collection and analysis standards to ensure performance metrics and reporting practices disaggregate data and analyses and address disparities in services and outcomes
- •Provide training and technical assistance on race equity that equips providers and organization with the CoC's tools to implement a race equity agenda.
- •Embed race equity principles, expectations, and requirements in all aspects of CoC planning, service delivery, and policies.
- •Ensure people of color have appropriate representation, decision-making authority, and avenues for professional development.

1D-11. Involving Individuals with Lived Experience of Homelessness in Service Delivery and Decisionmaking—CoC's Outreach Efforts.

NOFO Section VII.B.1.r.

Describe in the field below your CoC's outreach efforts (e.g., social media announcements, targeted outreach) to engage those with lived experience of homelessness in leadership roles and decision making processes.

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The CoC has a Lived Experience Advisory Board (LEAC) and Youth Action Board (YAB), and the Chairs of both of those committees have dedicated seats on the CoC Board. In 2019, the CoC board increased the number of dedicated seats of people with lived experience to 8 out of the 27 elected Board seats. Of the 8 dedicated seats for people with lived experience of homelessness, 2 of the seats are dedicated to youth members and 1 seat is dedicated to a person that also has lived experience of domestic violence. Having a diverse board ensures that people with lived experience are part of the leadership and decision-making process at the very top. In 2022, for the first time, the Vice Chair who was elected unanimously by the CoC is one of the founding members of the LEAC. The LEAC and YAB are active committees meeting multiple times a month; both in-person and through virtual meetings. The YAB most recently set out to create their own social media account that aligns with the goals and values of the CoC Board and its affiliates, but also allows the YAB to have its own representation to promote events either attended or hosted by the YAB, promote and recruitment for new membership, communicate with partner organizations, and highlight the YAB's agenda through a larger national platform. The CoC Board also prioritizes ensuring that members with lived experience and expertise are compensated for their time. The CoC's Resource Allocation Committee is working directly with the LEAC to increase their budget to ensure LEAC members have additional funding for equipment like laptops and Wi-Fi access, professional development funds, and resources for their committee meetings. The LEAC and YAB engage with service providers to also recruit participants that are currently enrolled in homeless service programs.

1D-11a.	Active CoC Participation of Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	

Enter in the chart below the number of people with lived experience who currently participate in your CoC under the five categories listed:

	Level of Active Participation	Number of People with Lived Experience Within the Last 7 Years or Current Program Participant	Number of People with Lived Experience Coming from Unsheltered Situations
1.	Included and provide input that is incorporated in the local planning process.	21	9
2.	Review and recommend revisions to local policies addressing homelessness related to coordinated entry, services, and housing.	21	9
3.	Participate on CoC committees, subcommittees, or workgroups.	15	4
4.	Included in the decisionmaking processes related to addressing homelessness.	8	2
5.	Included in the development or revision of your CoC's local competition rating factors.	8	2

1D-11b.	Professional Development and Employment Opportunities for Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	

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Describe in the field below how your CoC or CoC membership organizations provide professional development and employment opportunities to individuals with lived experience of homelessness.

(limit 2,500 characters)

The CoC Board and CoC Membership organizations prioritize the participation of people with lived experience and expertise, and this means ensuring people with lived experience are also prioritized for professional development and employment opportunities. The CoC currently provides a stipend to members of the Board, Lived Experience Advisory Committee (LEAC), and Youth Action Board (YAB). The CoC refers members of the LEAC and YAB for different professional development opportunities that include participating in other boards and committees that intersect between affordable housing and homelessness. All CoC and ESG funded organizations are required to have representation of persons with lived experience on their board. Additionally, many organizations prioritize hiring people with lived experience in leadership and direct service roles. The CoC's Resource Allocation Committee reviews new and renewal projects on factors that include how people with lived experience play a role in their program, and looks favorably on organizations that hire and, or are led by people with lived experience.

Most recently, the Youth Action Board, was able to hire a person with lived experience as the Youth Collaboration Coordinator (YCC) through support from the Annie E. Casey Fund. The YCC was hired to support the Youth Action Board and the development of meaningful youth leadership and collaboration.

In addition, Funders Together to End Homelessness Baltimore (FTEHB) is a philanthropic group that participates in the CoC, and helps to bring private and public funders together to focus on structural and racial inequities related to housing instability, homelessness, and supportive services. FTEHB collaborates with stakeholders and those with lived experience to inform grantmaking, identify critical gaps that need additional resources, and establish a continued learning agenda.

1D-11c.	Routinely Gathering Feedback and Addressing Challenges of Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	
		_
	Describe in the field below how your CoC:	
1.	how your CoC routinely gathered feedback from people experiencing homelessness and people who have received assistance through the CoC or ESG program on their experience receiving assistance; and	
2.	the steps your CoC has taken to address challenges raised by people with lived experience of homelessness	

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1. The CoC routinely gathers feedback from people experiencing homelessness and people who have received assistance through the CoC or ESG programs through community forums, listening sessions, and public meetings. As part of the development of the Youth Homelessness Demonstration Program, projects funded were required to go through a Youth Advisory Board (YAB) Engagement checklist that outlined how the YAB would collaborate with new projects prior to the project start, during the project, and through continuous quality improvement. The checklist includes ways the YAB would support and provide feedback on interview panels for hiring new staff, trainings, services and service delivery methods, and overall on policies and procedures. Additionally, the Lived Experience Advisory Committee meets weekly, and is a safe and welcoming environment for individuals to provide feedback on programming. The LEAC raises these concerns and works with the CoC Board and City Leadership to help resolve challenges.

2. The Development of the CoC Action Plan and the most recent Strategic Investment Plan to support the allocation of American Rescue Plan Act (ARPA) funds included extensive involvement with people with lived experience. During community information and listening sessions, individuals were able to raise concerns and gaps within the system to ensure funds and system-wide policies would address those issues. Some examples that were addressed were reforming shelter practices and policies, and the support and funding needed to move forward with establishing permanent non-congregate shelters within the community. The CoC also has established grievance policies for CoC and ESG programs to ensure that challenges raised by participants in programs are reviewed and resolved. In addition, the CoC hosts quarterly public member and board meetings that include public comment periods to ensure people with lived experience of homelessness or program participants have a platform to raise their concerns.

1D-12.	Increasing Affordable Housing Supply.
	NOFO Section VII.B.1.t.
	Describe in the field below at least 2 steps your CoC has taken in the past 12 months that engage city, county, or state governments that represent your CoC's geographic area regarding the following:
1.	reforming zoning and land use policies to permit more housing development; and
2.	reducing regulatory barriers to housing development.

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1. Increasing the supply of affordable housing is essential in Baltimore City's efforts to make homelessness rare, brief and nonrecurring and will yield the best and most cost-effective long-term results. Most recently, the CoC has been in conversation with Baltimore City's Council on a new zoning Bill that would ultimately increase density units in desirable neighborhoods. Baltimore's zoning code has historically reinforced racial inequities that negatively impact African Americans/Black Americans. Additionally, Baltimore has a high concentrations of vacant single family homes that are not economically viable to renovate, but converting them into multi-family homes would be cost-effective solution. The CoC continues to be interested in reviewing similar legislation that will have an opportunity to distribute more affordable housing across the city and dismantle some of the racial inequities.

2. Through the City's Strategic Investment Plan, the CoC is committed to supporting the development and pipeline of permanent supportive housing and affordable housing units designated for people experience homelessness. The CoC will work with Department of Housing and Community Development (DHCD) in the use of HOME-ARP funding for as an innovative financing strategy that may support the capital costs associated with developing permanent supportive housing. The CoC is also working with DHCD on redefining the Site and Neighborhood Standards for the development of permanent supportive housing and affordable housing to ensure that these standards are aligned with the City's Neighborhood Investment plan.

1E. Project Capacity, Review, and Ranking–Local Competition

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
 24 CFR part 578;
 FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1E	-1. Web Posting of Your CoC's Local Competition Deadline-Advance Public Notice.	
	NOFO Section VII.B.2.a. and 2.g.	
	You must upload the Local Competition Deadline attachment to the 4B. Attachments Screen.	
	Enter the date your CoC published the deadline for project applicants to submit their applications to your CoC's local competition.	08/11/2022
1E	-2. Project Review and Ranking Process Your CoC Used in Its Local Competition. We use the response to this question and the response in Question 1E-2a along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.	
	NOFO Section VII.B.2.a., 2.b., 2.c., and 2.d.	
	You must upload the Local Competition Scoring Tool attachment to the 4B. Attachments Screen.]
	Select yes or no in the chart below to indicate how your CoC ranked and selected project applications during your local competition:	
1. E	Established total points available for each project application type.	Yes
	At least 33 percent of the total points were based on objective criteria for the project application (e.g., cost effectiveness, timely draws, utilization rate, match, leverage), performance data, type of population served (e.g., DV, youth, Veterans, chronic homelessness), or type of housing proposed e.g., PSH, RRH).	Yes
a	At least 20 percent of the total points were based on system performance criteria for the project application (e.g., exits to permanent housing destinations, retention of permanent housing, length of time homeless, returns to homelessness).	Yes
4. F	Provided points for projects that addressed specific severe barriers to housing and services.	Yes
		Yes

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1E	-2a.	Scored Project Forms for One Project from Your CoC's Local Competition. We use the response to this question and Question 1E-2. along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.		
		NOFO Section VII.B.2.a., 2.b., 2.c., and 2.d.		
		You must upload the Scored Forms for One Project attachment to the 4B. Attachments Screen.]	
		Complete the chart below to provide details of your CoC's local competition:]	
4	\A/ba	nt were the maximum number of points available for the renewal project form(a)?		200
		at were the maximum number of points available for the renewal project form(s)?		
		v many renewal projects did your CoC submit?		31
3.	Wha	at renewal project type did most applicants use?	PH-PSH	
1E	-2b.	Addressing Severe Barriers in the Local Project Review and Ranking Process. NOFO Section VII.B.2.d.		
]	
		Describe in the field below:		
	1.	how your CoC collected and analyzed data regarding each project that has successfully housed program participants in permanent housing;		
	2.	how your CoC analyzed data regarding how long it takes to house people in permanent housing;		
	3.	how your CoC considered the specific severity of needs and vulnerabilities experienced by program participants preventing rapid placement in permanent housing or the ability to maintain permanent housing when your CoC ranked and selected projects; and		
	4.	considerations your CoC gave to projects that provide housing and services to the hardest to serve populations that could result in lower performance levels but are projects your CoC needs in its geographic area.		
			-	

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- 1. The Resource Allocation Committee (RAC) annually reviews the scoring and ranking tool used in the annual CoC Competition. The scoring tool analyzes individual project performance metrics by reviewing the last completed Annual Performance Report (APR). The RAC reviewed the percent of exits to permanent housing by reviewing this data metric on the APR. PSH projects received full points if 90% or more of households had successful exits/remained in permanent housing, and RRH projects received full points if 75% or more of households had moved into permanent housing. Projects that had less received partial points.
- 2. Similarly, the RAC reviewed the length of stay based on the average length of time a participant spends from project entry to residential move-in. RRH and PSH projects received full points if the average was 30 days or less from project entry to residential move-in. Projects that had longer length of stays received partial points.
- 3. The CoC strategically prioritizes PSH projects to ensure continued funding for housing and services that serve the most vulnerable and highest need populations. The scoring tool gives additional points to projects that serve a high need population that focuses on households that are chronically homeless. Although all projects receive referrals through the Coordinated Access System, chronically homeless households may need more supports and time to recover and stabilize in housing. Therefore, providing additional points to projects with a higher rate of chronic households ensures the project is not panelized in the rating system. The RAC also evaluates income status, exits to permanent housing, returns to homelessness, and additional local factors.
- 4. The RAC emphasizes the importance of housing opportunities through CoC funds, and therefore projects that did not meet the benchmark goal for each performance metric received partial points when applicable. This ensures that projects that serve the most vulnerable populations are still considered in the final priority listing. The RAC is dedicated to conduct further analysis outside of the program competition to ensure projects that have a lower performance levels are still reaching the most vulnerable households and providing robust services that are focused on housing stability.

1E-3.	Promoting Racial Equity in the Local Competition Review and Ranking Process.	
	NOFO Section VII.B.2.e.	
	Describe in the field below:	
1.	how your CoC obtained input and included persons of different races, particularly those over-represented in the local homelessness population;	
2.	how the input from persons of different races, particularly those over-represented in the local homelessness population, affected how your CoC determined the rating factors used to review project applications;	
3.	how your CoC included persons of different races, particularly those over-represented in the local homelessness population, in the review, selection, and ranking process; and	
4.	how your CoC rated and ranked projects based on the degree to which their project has identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and has taken or will take steps to eliminate the identified barriers.	

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- 1-3. The CoC's Resource Allocation Committee (RAC) which reviews, selects, and ranks applications in our community has highly prioritized both diversity in membership and representation of people with lived experience. The RAC is considered a closed committee since membership is limited to individuals that are not receiving or seeking funding through CoC or ESG programs. However, the committee continuously looks to gain new members that represent the local homelessness population, and recruits new members throughout the calendar year. Currently half of the RAC members are black, indigenous, people of color (BIPOC), and more than half of the committee members have personal lived experience and expertise of homelessness. Since the RAC has the authority to make changes to the rating and ranking tool having diverse perspectives helps ensure that the RAC is using an equity lens.
- 4. This year the RAC included 3 qualitative responses to all renewal and new projects that asked organizations how their projects 1) aligned to the FY 2022 HUD Policy Priorities, 2) emphasized racial equity and took steps to eliminate barriers to improve racial equity, and 3) addressed the needs of the Lesbian, Gay, Bisexual, Transgender and Queer (LGBTQ+) individuals. Additional points were granted to projects that served underserved populations, such as LGBTQ+ and BIPOC individuals. Additionally, responses were favored that indicated there were steps taken to eliminate barriers, such as providing additional cultural competency trainings for staff, reviewing policies and procedures using an equity lens, and reviewing data and performance outcomes.

1E-4.	Reallocation–Reviewing Performance of Existing Projects.
	NOFO Section VII.B.2.f.
	Describe in the field below:
1.	your CoC's reallocation process, including how your CoC determined which projects are candidates for reallocation because they are low performing or less needed;
2.	whether your CoC identified any projects through this process during your local competition this year;
3.	whether your CoC reallocated any low performing or less needed projects during its local competition this year; and
4.	why your CoC did not reallocate low performing or less needed projects during its local competition this year, if applicable.

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- 1. The CoC's Resource Allocation Committee (RAC), comprised of individuals with lived experience, non-funded providers, funders, and public system leaders meets monthly to review projects. The RAC proposes a written resource allocation strategy annually to the CoC Board for full approval prior to the Notice of Funding Opportunity that is reflected in the CoC Governance Charter and Bylaws. The Board approved the FY 2022 reallocation strategy, rating and ranking criteria at their June 2022 Board meeting. The RAC focus on 4 areas that include project spending, utilization, performance, and compliance that ultimately provide recommendations for technical assistance and, or partial or full reallocation.
- 2. The RAC reviewed all renewal projects using the annual reallocation strategy, however was not able to determine any additional projects for reallocation this year
- 3. This year, the CoC uncovered unusual project spending for 4 projects, 3 projects were direct grants to AIDS Interfaith Residential Services, Inc. (AIRS) and the 1 project was subgranted to AIDS Interfaith Residential Services, Inc. After a monitoring visit by the Mayor's Office of Homeless Services (MOHS) and HUD in May 2022, it was determined that the AIRS was mismanaging the project and corrective action needed to be taken. Ultimately, AIRS has been sanctioned by MOHS and HUD, and current awards were terminated. AIRS did not reapply for renewal funding during the FY 2022 project competition, and the RAC determined that the 3 PSH projects would be reallocated and the 1 transitional housing project would be transferred to a new subrecipient.

1E-4a.	Reallocation Between FY 2017 and FY 2022.	
	NOFO Section VII.B.2.f.	
	Did your CoC cumulatively reallocate at least 20 percent of its ARD between FY 2017 and FY 2022?	No
1	E-5. Projects Rejected/Reduced–Notification Outside of e-snaps.	
	NOFO Section VII.B.2.g.	
	You must upload the Notification of Projects Rejected-Reduced attachment to the 4B. Attachments Screen.	
1.	Did your CoC reject or reduce any project application(s)?	Yes
2.	Did your CoC inform applicants why their projects were rejected or reduced?	Yes
3.	If you selected Yes for element 1 of this question, enter the date your CoC notified applicants that their project applications were being rejected or reduced, in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2022, 06/27/2022, and 06/28/2022, then you must enter 06/28/2022.	05/25/2022
	applicants on 06/26/2022, 06/27/2022, and 06/28/2022, then you must enter 06/28/2022.	
1E	E-5a. Projects Accepted-Notification Outside of e-snaps.	
	NOFO Section VII.B.2.g.	
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app	ked on the New and R dicants on various date	notified project applicants that their project applica enewal Priority Listings in writing, outside of e-sna es, enter the latest date of any notification. For exa .06/27/2022, and 06/28/2022, then you must ente	aps. If you notified	09/15/2022
	1			T
1E-5b.	Local Competition S	election Results-Scores for All Projects.		
	NOFO Section VII.B.	2.g.		
	You must upload the Screen.	Final Project Scores for All Projects attachment to	the 4B. Attachments	
1. A 2. P 3. P 5. A	es your attachment inc Applicant Names; Project Names; Project Scores; Project Rank-if accepte Ward amounts; and	ed;		Yes
4F 50	45 Eq. Wah Dooting			
1E-5C.	NOFO Section VII.B.	Web Posting-CoC-Approved Consolidated Applic	cation attachment to the 4B.	
Entr part 1. tf	NOFO Section VII.B. You must upload the Attachments Screen. er the date your CoC putner's website—which in the CoC Application: ar	2.g. Web Posting–CoC-Approved Consolidated Applications the CoC-approved Consolidated Application cluded:	n on the CoC's website or	09/28/2022
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Entr part 1. tf	NOFO Section VII.B You must upload the Attachments Screen. er the date your CoC ptner's website—which in the CoC Application; ar	2.g. Web Posting—CoC-Approved Consolidated Application cluded: ad illocation forms and all New, Renewal, and Replace Notification to Community Members and Key Stakeholders that the CoC-Approved Consolidated Application is Posted on Website.	n on the CoC's website or	09/28/2022

2A. Homeless Management Information System (HMIS) Implementation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
 24 CFR part 578;
 FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2A-1	. HMIS Vendor.		
	Not Scored–For Information Only		
En	ter the name of the HMIS Vendor your CoC is	currently using.	Eccovia Solutions, ClientTrack
2A-2	. HMIS Implementation Coverage Area.		
	Not Scored–For Information Only		
Se	lect from dropdown menu your CoC's HMIS co	verage area.	Single CoC
	T.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
2A-3			
	NOFO Section VII.B.3.a.		
En	ter the date your CoC submitted its 2022 HIC d	lata into HDX.	04/29/2022
2A-4	. Comparable Database for DV Providers–CoC Data Submission by Victim Service Providers	C and HMIS Lead Supporting Data Col	lection and
	NOFO Section VII.B.3.b.		
	In the field below:		
1	. describe actions your CoC and HMIS Lead h providers in your CoC collect data in databas requirements; and	ave taken to ensure DV housing and s es that meet HUD's comparable datab	service pase
2	state whether your CoC is compliant with the	2022 HMIS Data Standards.	
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- 1. House of Ruth of Maryland (HRM) is the lead DV provider in the CoC. Through the SSO-CE DV Bonus project, HRM uses Efforts to Outcomes (ETO) as the comparable database that meets all HMIS Data Standards and does so in a method that protects the safety and privacy of the survivor. ETO is able to collect all fields required for an HMIS by the kind of project it is (e.g., Emergency Shelter, Rapid Re-housing). It must also allow the user to enter specific data at multiple data collection stages (record creation, project start, status update, annual assessment, and project exit) to support reporting and performance measurements required by HUD for all CoC and ESG program recipients and subrecipients. Each reporting cycle the HMIS Lead works closely with HRM to submit de-identified aggregated system performance measures that contains all data metrics as required by HMIS.
- 2. MD-501 is compliant with the 2022 HMIS Data Standards.

2A-5.	Bed Coverage Rate-Using HIC, HMIS Data-CoC Merger Bonus Points.	
	NOFO Section VII.B.3.c. and VII.B.7.	

Enter 2022 HIC and HMIS data in the chart below by project type:

Project Type	Total Beds 2022 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
1. Emergency Shelter (ES) beds	1,519	62	1,177	80.78%
2. Safe Haven (SH) beds	33	0	26	78.79%
3. Transitional Housing (TH) beds	946	12	525	56.21%
4. Rapid Re-Housing (RRH) beds	538	42	496	100.00%
5. Permanent Supportive Housing	3,117	0	2,491	79.92%
6. Other Permanent Housing (OPH)	1,838	0	101	5.50%

2A-5a.	Partial Credit for Bed Coverage Rates at or Below 84.99 for Any Project Type in Question 2A-5.
	NOFO Section VII.B.3.c.
	For each project type with a bed coverage rate that is at or below 84.99 percent in question 2A-5, describe:
1.	steps your CoC will take over the next 12 months to increase the bed coverage rate to at least 85 percent for that project type; and
2.	how your CoC will implement the steps described to increase bed coverage to at least 85 percent.

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- There are a number of reasons why the bed coverage rates are at or below 84.99% for Emergency Shelter, Transitional Housing, Permanent Supportive Housing, Safe Havens, and Other Permanent Housing. Currently, ES and TH beds have lower coverage mainly due to the number of private organizations that have limited staff and resources and faith-based organizations that typically do not receive federal funding and operate both ES and TH beds that contribute to the data. Some programs have stopped participating in HMIS after federal funding cuts caused them to lose capacity to participate in HMIS. The gap in PSH coverage is due entirely to HUD-VASH units that are not represented in HMIS and the significant gap in OPH is because the increase in vouchers through the Public Housing Authority that also do not participate in HMIS. There is also only one Safe Haven project, so a decrease in utilization impacts the bed rate coverage. The CoC is committed to evaluating this data to improve bed coverage rates. The CoC Executive Leadership Committee will need to increase their level of engagement with private organizations, faith-based organizations, the VA, and the Housing Authority of Baltimore City to emphasize the value of HMIS participation. Additionally, the CoC will need to gather information on what barriers prevent these entities from participating fully in the HMIS system.
- 2. The CoC's Action Plan provides a new opportunity to engage providers as part of the strategy to develop a streamlined homeless response system. Through the Built for Zero Initiative, the CoC is working to reduce Veteran homelessness and engage directly with local VA leadership to address HMIS coverage, data quality, case conferencing, and other collaborative system planning solutions. The CoC recently expanded its participation in the Built for Zero initiative, and has focused on enhancing data quality and conducting case conferencing using a quality By-Name List. The CoC plans to engage more with faith-based organizations to show the value of working together, eliminate duplicate data entry by using HUD's HMIS XML/Data migration tool from other databases to other legacy systems, use of software customization to create ease in entering data in HMIS, and work with non-participating organizations to emphasize the ability to generate community wide data that can be used in program planning.

2A-6.	Longitudinal System Analysis (LSA) Submission in HDX 2.0.	
	NOFO Section VII.B.3.d.	
		-
Did	your CoC submit LSA data to HUD in HDX 2.0 by February 15, 2022, 8 p.m. EST?	Yes

2B. Continuum of Care (CoC) Point-in-Time (PIT) Count

 $\hbox{HUD publishes resources on the HUD.gov website at \ CoC\ Program\ Competition\ to\ assist\ you\ in\ completing\ the\ CoC\ Application.\ Resources\ include:}$

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
 - 24 CFR part 578;
 - FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2B-1.	PIT Count Date.	
	NOFO Section VII.B.4.b	
		_
Ent	er the date your CoC conducted its 2022 PIT count.	02/26/2022
2B-2.	PIT Count Data-HDX Submission Date.	
	NOFO Section VII.B.4.b	
		_
Ent	er the date your CoC submitted its 2022 PIT count data in HDX.	04/29/2022
2B-3.	PIT Count–Effectively Counting Youth.	
	NOFO Section VII.B.4.b.	
		_
	Describe in the field below how during the planning process for the 2022 PIT count your CoC:]
1.	engaged stakeholders that serve homeless youth;]
2.	involved homeless youth in the actual count; and	1
3.	worked with stakeholders to select locations where homeless youth are most likely to be identified.	
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- 1. The CoC engaged youth providers and the Youth Action Board in the planning and execution of the 2022 Point-in-Time Count. Youth and youth providers participated in planning meetings to identify shelters, transitional housing, and drop-in centers that youth frequent. Additionally, members of the planning committee supported the review of the survey, training material, and execution of the Count. Youth providers also promoted and shared outreach materials to their participants to increase awareness among youth experiencing homelessness. Youth providers participated as volunteer hubs the night of the count and focused on capturing areas frequented by young people.
- 2. The Youth Action Board participated in planning meetings and were encouraged to participate in the night of the count. Additionally, YAB members were eligible to receive stipends for their time participating in all PIT activities.
- 3. The CoC worked with outreach teams to develop hotspot maps that directed volunteers to locations that are most frequented by youth experiencing homelessness. The CoC also works with the State on conducting Youth REACH Count bi-annually, and reviewed previous planning data and information to support the 2022 count.

2B-4.	PIT Count–Methodology Change–CoC Merger Bonus Points.
	NOFO Section VII.B.5.a and VII.B.7.c.
	In the field below:
1.	describe any changes your CoC made to your sheltered PIT count implementation, including methodology or data quality changes between 2021 and 2022, if applicable;
2.	describe any changes your CoC made to your unsheltered PIT count implementation, including methodology or data quality changes between 2021 and 2022, if applicable; and
3.	describe how the changes affected your CoC's PIT count results; or
4.	state "Not Applicable" if there were no changes or if you did not conduct an unsheltered PIT count in 2022.

- 1. The CoC did not make significant changes to the sheltered PIT Count implementation, including methodology or data quality changes between 2021 and 2022.
- 2. The CoC received a waiver from HUD exempting them from conducting the 2021 PIT Count due to COVID-19. There were a few changes in the implementation and methodology from 2020 to 2022, mainly to account for COVID-19 and the challenges of hosting a large volunteer event. The following changes were implemented:
- The Count, which is consistently scheduled within the last 10 days in January, was changed to February, 26th due to a surge of COVID-19 infections in the area.
- Due to challenges with volunteer recruitment the count was conducted over 1 night between 6pm-11pm instead of 2 consecutive nights.
- Due to challenges with volunteer recruitment the count was conducted on a Saturday night instead of a Sunday or Monday night.
- Volunteer hubs were set up across the City to limit large gathering of volunteers in one location.
- No site-based counts were set up post count since previous years data noted this increased the number of duplicates.
- 3. The challenges surrounding the 2022 PIT Count due to the surge of COVID-19, and the necessary adjustment made to the 2022 PIT Count impacted the efficacy of the Count. The PIT Count continues to provide vital information about the needs, current gaps, and inequities in our current homelessness system, however it is only a snapshot. Comparing only PIT count data would indicate a decrease in homelessness in our community, when in fact the rates of homelessness and housing instability have been on the rise since the onset of the pandemic. Although Baltimore has seen an increase in positive housing outcomes with additional Federal funding to expand rapid re-housing and homelessness prevention programs, the issues surrounding unsheltered homelessness are still prevalent in our community.

2C. System Performance

 $\hbox{HUD publishes resources on the HUD.gov website at \ CoC\ Program\ Competition\ to\ assist\ you\ in\ completing\ the\ CoC\ Application.\ Resources\ include:}$

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
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- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

20.1	Reduction in the Number of First Time Homeless–Risk Factors Your CoC Uses.
20-1.	Reduction in the Number of First Time Homeless—Risk Factors Tour Coc Oses.
	NOFO Section VII.B.5.b.
	In the field below:
1.	describe how your CoC determined the risk factors to identify persons experiencing homelessness for the first time;
2.	describe your CoC's strategies to address individuals and families at risk of becoming homeless; and
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the number of individuals and families experiencing homelessness for the first time

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- 1. The CoC uses HMIS, PIT Counts (regular and youth), vulnerability assessments, input from Lived Experience Advisory Committee and Youth Action Board members, and community partners to identify major risk factors for becoming homeless. The initial analysis shows that common risk factors include unemployment/underemployment, co-occurring mental health and substance abuse disorders, and high utilization of emergency care services. Special risk factors for families include a history of domestic violence, poor rental histories that include an eviction or evictions, and involvement with the foster care system. Additionally, risk factors for veterans include advanced age and disability, and risk factors for youth include involvement with foster care and/or juvenile justice systems.
- 2. Through the Strategic Investment Planning, the community has prioritized the use of American Rescue Plan Act (ARPA) funds for flexible funding to increase diversion and rapid resolution programs. The CoC currently offers some flexible funding through philanthropic grants, but the increased investment will ensure over 500 households will have additional access to these programs that will reduce individuals and families from entering the homelessness system. The CoC is also working to increase its partnership with the VA to ensure veteran specific resources can be shared and accessed broadly. The Youth Homelessness Demonstration Project also has 2 SSO projects that focus on diversion and family based projects to ensure youth are connected to services to prevent homelessness. Both the project combined aim to serve 85 youth annually.
- 3.MOHS collaborates with the Community Action Partnership centers operated by the Mayor's Office of Children and Family Success (MOCFS) and United Way of Central Maryland to provide emergency rental assistance and other prevention resources at key geographic points across the City leveraging existing resources and utilizing ESG, ESG-CV, and additional funding. MOHS' coordinated entry hotline that connects people with shelter resources, also provides referrals for prevention and diversion resources including emergency rental and energy assistance, resources to reconnect with family, and other one-time interventions as needed.

2C-2.	Length of Time Homeless–CoC's Strategy to Reduce.	
	NOFO Section VII.B.5.c.	
	In the field below:	
1.	describe your CoC's strategy to reduce the length of time individuals and persons in families remain homeless;	
2.	describe how your CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the length of time individuals and families remain homeless.	

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- 1. The CoC has multiple approaches to reduce the length of time individuals and families remain homeless that includes the following:
- Technical Assistance with Built for Zero to facilitate systems process improvement that focuses on quickly moving people through the system by identifying barriers and bottlenecks.
- Increasing investments in the supply of affordable housing that includes the development of 150 new Permanent Supportive Housing and 155 Rapid Rehousing opportunities through ARPA.
- Leveraging public and private dollars to provide a flex funding to remove housing barriers.
- Increasing and improve landlord engagement to include incentives for landlords to work with CoC programs.
- Shelter transformation that includes new investments in housing-focused care coordination and case management.

With the onset of COVID-19 the CoC has emphasized the importance of moving people quickly out of shelters and unsheltered situations. By increasing shelter coordination and prioritizing RRH funds to demobilize shelters, the CoC has been able to reduce the length of time people remain homeless. Additional, investments through CoC, ESG, ESG-CV, and EHV and Family Vouchers through the public housing authority have also supported additional housing options which ultimately helps move households into permanent housing.

- 2. The CoC conducts case conferences using a quality By- Name List that has helped identify households with the longest length of time for youth, veterans, families, unsheltered individuals and shelter residents. The CoC works with navigators and providers to determine how to best resolve each household's homelessness.
- 3. The Mayor's Office of Homeless Services is responsible for facilitating the case conferencing meetings, and is getting additional technical assistance from TAC and Built for Zero to assist with rehousing.

2C-3.	Exits to Permanent Housing Destinations/Retention of Permanent Housing–CoC's Strategy
	NOFO Section VII.B.5.d.
	In the field below:
1.	describe your CoC's strategy to increase the rate that individuals and persons in families residing in emergency shelter, safe havens, transitional housing, and rapid rehousing exit to permanent housing destinations;
2.	describe your CoC's strategy to increase the rate that individuals and persons in families residing in permanent housing projects retain their permanent housing or exit to permanent housing destinations; and
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to increase the rate that individuals and families exit to or retain permanent housing.

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- 1. The CoC has prioritized demobilizing shelters to ensure there is rapid transition from emergency shelters to more permanent locations. Large investments using ARPA funding has been committed to expand rapid rehousing, flexibile funding, and landlord engagement to improve outcomes for individuals and families residing in Emergency Shelters. In addition, the similar efforts are made to ensure individuals in safe havens and transitional housing programs have the same access to programming through the Coordinated Access System. Additional case conferencing with rapid re-housing providers to ensure households are able to stabilize at the end of their subsidy has improved the outcomes in permanent housing retention. Additionally, the CoC has a transfer policy to ensure households that have time-limited assistance, but need additional support are able to transfer to more intensive programs to ensure households do not return to homelessness.
- 2. The CoC has maintained high permanent housing retention rates for households enrolled in PSH projects, however efforts to maintain and increase outcomes include implementation of system- wide housing first practices (lowering eviction rates), landlord-tenant mediation services, eviction prevention, utilizing interdisciplinary case conferencing, and the introduction of employment and income interventions. MOHS has also been working with the CoC providers on systems improvement that focus on increasing data quality and exits to permanent housing within permanent housing projects. In addition, the CoC has had initial conversations about the importance of having a move-on strategy that would strengthen the partnership with the public housing authority and would allow to turnover PSH units to households with more severe needs.
- This is a joint effort between the Affordable Housing Committee, Homeless Response System Committee, and Shelter Transformation Committee, with support from MOHS and Coordinated Access team.

2C-4.	Returns to Homelessness–CoC's Strategy to Reduce Rate.	
	NOFO Section VII.B.5.e.	
	In the field below:	
1.	describe your CoC's strategy to identify individuals and families who return to homelessness;	
2.	describe your CoC's strategy to reduce the rate of additional returns to homelessness; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the rate individuals and persons in families return to homelessness.	

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- 1. The CoC evaluates project and system-level returns to homelessness for households that exited to permanent housing (including housing with friends and family). The CoC utilizes data from HMIS to determine common reasons for return, including family conflict, loss of housing due to landlord-tenant conflict or substandard housing, incarceration, and eviction for non-payment of rent. Additionally, the CoC disaggregates data by race and other demographic characteristics and utilizes population-specific assessments. For youth, additional factors for returns to homelessness include interaction with the foster care system or corrections system, family conflict, and overcrowding in housing.
- 2. Strategies to reduce returns to homelessness include increasing diversion and family strengthening practices across the CoC. This included implementing specialized diversion programs for youth and providing diversion training for shelter, drop-in center, and outreach providers. The CoC includes prevention assistance within RRH program budgets for one-time emergency assistance. The CoC has partnered with the Mayor's Office of Children and Family Success and the Department of Housing and Community Development, to support prevention programs that can prevent households from returning to the homelessness system. In addition, the CoC Board coordinates local legal advocates to offer eviction prevention.
- 3. The Mayor's Office of Children and Family Success and the Department of Housing and Community Development, along with the Mayor's Office of Homeless Services oversees this strategy in partnership with the CoC's Homeless Response System Action Committee.

2C-5.	Increasing Employment Cash Income–CoC's Strategy.
NOFO Section VII.B.5.f.	
	In the field below:
1.	describe your CoC's strategy to access employment cash sources;
2.	describe how your CoC works with mainstream employment organizations to help individuals and families experiencing homelessness increase their cash income; and
3.	provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase income from employment.

- 1. The CoC's Action Plan includes access to employment and income as one of five key strategies. Part of the strategy includes an integrated assessment and referral system that connects Coordinated Access (CA) to mainstream employment services, cross-training for homeless service/workforce providers, reformed policies/practices that support employment, barrier removal services, and a race equity agenda. The CoC already uses an employment assessment within CA to identify households with existing employment and will develop referrals to mainstream workforce services to develop career pathways and further increase income.
- 2. The CoC's Employment and Income Committee have reconvened and are working on completing an assessment of mainstream employment services and reviewing current data on employment access and need. The committee will work on updating the 2018 Journey to Jobs report, in addition to providing actual resources providers and participants can access to increase their employment opportunities. In addition, the CoC continues to provide guidance and information on accessing Supported Employment services. The CoC also updated emergency shelter policies to accommodate households working or participating in workforce programs. All RRH projects include employment navigation to connect households to employment supports.
- 3. The CoC co-leads efforts through the Employment and Income Action Committee and the Mayor's Office of Employment Development (MOED).

2C-5a.	Increasing Non-employment Cash Income–CoC's Strategy	
	NOFO Section VII.B.5.f.	
	In the field below:	
1.	describe your CoC's strategy to access non-employment cash income; and	
2.	provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase non-employment cash income.	

- The CoC's Action Plan includes strategies to increase non-employment cash income by referring household to benefits specialists and to provide ongoing support to ensure households retain access to benefits. Currently, CoC-funded programs are required to become SOAR-trained and, or refer clients directly to SOAR to access disability benefits or other benefits services. SOAR-trained case managers assess clients for eligibility and enroll clients that are eligible into the program. SOAR specialists support clients through the intensive application process and rapidly connect clients to Social Security benefits. The CoC's lead SOAR agency is Health Care for the Homeless, and they complete approximately one-third of SOAR cases in Maryland. In 2021, Maryland was highlighted as having completed 1,706 decisions with an 86% approval rate in SOAR Cases, and were highlighted by SAMSHA in regards to their impact and consistency. By increasing the number of providers that are trained in SOAR the CoC is able to rapidly connect more participants to non-employment cash benefits. Clients that may not be eligible for SOAR are still assisted with accessing mainstream benefits. In 2022, Baltimore City launched Baltimore Young Families Success Fund where 200 youth headed households (18-24) with children that were in crisis with schools and daycares closing, experiencing unemployment, and were housing or food insecure were connected to an unconditional cash payment of \$1,000 per month over the course of 24 months. This is the first guaranteed income program in Baltimore, and will be evaluated how it can address income inequality and combat the economic fallout from COVID-19.
- 2. Health Care for the Homeless and the State Lead at the Behavioral Health Administration are the SOAR leads. Care Coordination Team and providers also have access to become SOAR certified. The Mayor's Office of Children and Family Success is the lead on Guaranteed Income Pilot.

3A. Coordination with Housing and Healthcare

 $\hbox{HUD publishes resources on the HUD.gov website at \ CoC\ Program\ Competition\ to\ assist\ you\ in\ completing\ the\ CoC\ Application.\ Resources\ include:}$

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;FY 2022 CoC Application Navigational Guide;

PH-PSH

SCS Youth Permane...

- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

Project Name		Project Type	Ran	k Number	Leverage	Туре
	If you selected yes to questions 3A-1. or 3A-2., use the list feature icon to enter information about each project application you intend for HUD to evaluate to determine if they meet the criteria.					ch
	NOFO Sections VII.B.6.a. and VII.B.6.b.					
3A-3.	Leveraging	Housing/Healthcare Resou	rces-List of Proje	cts.		
	1					
	Is your CoC individuals a	applying for a new PH-PSI and families experiencing ho	H or PH-RRH pro	ject that uses healtho	are resources to help	Yes
	You mu	ust upload the Healthcare Fo	ormal Agreement	s attachment to the 4l	3. Attachments Screen	
NOFO Section VII.B.6.b.						
3	A-2. New Pl	H-PSH/PH-RRH Project-Le	veraging Healthc	are Resources.		
		-				
	housing uni	applying for a new PH-PSI ts which are not funded thro g homelessness?	H or PH-RRH proj ough the CoC or E	ect that uses housing SG Programs to help	subsidies or subsidize individuals and familie	d No
	You mu Screen	ust upload the Housing Leve	eraging Commitm	ent attachment to the	4B. Attachments	
	NOFO	Section VII.B.6.a.				
_	SA-1. New Pi	H-PSH/PH-RRH Project-Le	veraging Housing	Resources.		

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Healthcare

3A-3. List of Projects.

1. What is the name of the new project? SCS Youth Permanent Housing Program

2. Enter the Unique Entity Identifier (UEI): JNDJL5E96W68

3. Select the new project type: PH-PSH

4. Enter the rank number of the project on your 32

CoC's Priority Listing:

5. Select the type of leverage: Healthcare

3B. New Projects With Rehabilitation/New Construction Costs

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578; FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3B-1.	Rehabilitation/New Construction Costs-New Projects.	
	NOFO Section VII.B.1.s.	
Is ye for I	our CoC requesting funding for any new project application requesting \$200,000 or more in funding housing rehabilitation or new construction?	No
3B-2.	Rehabilitation/New Construction Costs-New Projects.	
	NOFO Section VII.B.1.s.	
	If you answered yes to question 3B-1, describe in the field below actions CoC Program-funded project applicants will take to comply with:	
1.	Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u); and	
2.	HUD's implementing rules at 24 CFR part 75 to provide employment and training opportunities for low- and very-low-income persons, as well as contracting and other economic opportunities for businesses that provide economic opportunities to low- and very-low-income persons.	

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3C. Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes

 $\hbox{HUD publishes resources on the HUD.gov website at \ CoC\ Program\ Competition\ to\ assist\ you\ in\ completing\ the\ CoC\ Application.\ Resources\ include:}$

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
 FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

		,
3C-1.	Designating SSO/TH/Joint TH and PH-RRH Component Projects to Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section VII.C.	
proj	our CoC requesting to designate one or more of its SSO, TH, or Joint TH and PH-RRH component ects to serve families with children or youth experiencing homelessness as defined by other eral statutes?	No
3C-2.	Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section VII.C.	
	You must upload the Project List for Other Federal Statutes attachment to the 4B. Attachments Screen.	
	If you answered yes to question 3C-1, describe in the field below:	
	how serving this population is of equal or greater priority, which means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under Section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth than serving the homeless as defined in paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578.3; and	
2.	how your CoC will meet requirements described in Section 427(b)(1)(F) of the Act.	

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4A. DV Bonus Project Applicants

 $\hbox{HUD publishes resources on the HUD.gov website at \ CoC\ Program\ Competition\ to\ assist\ you\ in\ completing\ the\ CoC\ Application.\ Resources\ include:}$

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;

 - 24 CFR part 578;- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

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	4A-1.	New DV Bonus Project Applications.	
		NOFO Section II.B.11.e.	

	Did your CoC submit one or more new project applications for DV Bonus Funding?	No
Applicant Name		
	This list contains no items	

4B. Attachments Screen For All Application Questions

We have provided the following guidance to help you successfully upload attachments and get maximum points:

1	You must include a Document Description for each attachment you upload; if you do not, the Submission Summary screen will display a red X indicating the submission is incomplete.
2	You must upload an attachment for each document listed where 'Required?' is 'Yes'.
3	We prefer that you use PDF files, though other file types are supported–please only use zip files if necessary. Converting electronic files to PDF, rather than printing documents and scanning them, often produces higher quality images. Many systems allow you to create PDF files as a Print option. If you are unfamiliar with this process, you should consult your IT Support or search for information on Google or YouTube.
4	Attachments must match the questions they are associated with.
5	Only upload documents responsive to the questions posed-including other material slows down the review process, which ultimately slows down the funding process.
6	If you cannot read the attachment, it is likely we cannot read it either.
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. We must be able to read everything you want us to consider in any attachment.

7. After you upload each attachment, use the Download feature to access and check the attachment to ensure it matches the required Document Type and to ensure it contains all pages you intend to include.

Document Type	Required?	Document Description	Date Attached
1C-7. PHA Homeless Preference	No	1C-7_MD-501_PHA H	09/27/2022
1C-7. PHA Moving On Preference	No		
1E-1. Local Competition Deadline	Yes	Local Competition	09/27/2022
1E-2. Local Competition Scoring Tool	Yes	Local Competition	09/28/2022
1E-2a. Scored Renewal Project Application	Yes	Scored Forms for	09/28/2022
1E-5. Notification of Projects Rejected-Reduced	Yes	Notification of P	09/27/2022
1E-5a. Notification of Projects Accepted	Yes	Notification of P	09/28/2022
1E-5b. Final Project Scores for All Projects	Yes	Final Project Sco	09/28/2022
1E-5c. Web Posting–CoC- Approved Consolidated Application	Yes		
1E-5d. Notification of CoC- Approved Consolidated Application	Yes		
3A-1a. Housing Leveraging Commitments	No	Healthcare Formal	09/28/2022

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Applicant: City of Baltimore - Mayor's Office of Homeless Services **Project:** MD-501 CoC Registration FY 2022

MD-501 CoC COC_REG_2022_192153

3A-2a. Healthcare Formal Agreements	No	
3C-2. Project List for Other Federal Statutes	No	

Attachment Details

Document Description: 1C-7_MD-501_PHA Homeless Preference

Attachment Details

Document Description:

Attachment Details

Document Description: Local Competition Announcement

Attachment Details

Document Description: Local Competition Scoring Tool

Attachment Details

Document Description: Scored Forms for One Project

Attachment Details

Document Description: Notification of Projects Rejected-Reduced

Attachment Details

Document Description: Notification of Projects Accepted

Attachment Details

Document Description: Final Project Scores for All Projects

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: Healthcare Formal Agreement

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Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated	
1A. CoC Identification	09/22/2022	
1B. Inclusive Structure	09/22/2022	
1C. Coordination and Engagement	09/22/2022	
1D. Coordination and Engagement Cont'd	09/26/2022	
1E. Project Review/Ranking	09/26/2022	
2A. HMIS Implementation	09/26/2022	
2B. Point-in-Time (PIT) Count	09/26/2022	
2C. System Performance	09/26/2022	
3A. Coordination with Housing and Healthcare	09/28/2022	
3B. Rehabilitation/New Construction Costs	09/23/2022	
3C. Serving Homeless Under Other Federal Statutes	09/23/2022	

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4A. DV Bonus Project Applicants

09/23/2022

4B. Attachments Screen

Please Complete

Submission Summary

No Input Required

FY 2022 CoC Competition

MD-501

Attachments for the FY 2022 CoC Application

1C-7 – Public Housing Agencies within Your CoC's Geographic Area–New Admissions– General/Limited Preference

Attachments Include the Following:

 Sections of Housing Authority of Baltimore City – The FY 2022 Housing Choice Voucher Program Administrative Plan. Approved by the HABC Board of Commissioners February 17, 2022.

Please see highlighted sections that include the following:

4.3.3 Preference 2

Families with Children, Non-Elderly Persons with Disabilities, and Senior Household Preferences

4.3.4 Mainstream Voucher Program Preference

HABC was awarded a total of 116 tenant-based vouchers through the Mainstream Voucher Program (categories for preference include Homeless or At-Risk of becoming Homeless.

- **4.11** SET-ASIDE VOUCHERS FOR CHRONICALLY HOMELESS HOUSEHOLDS
- 4.12 SET-ASIDE VOUCHERS FOR RE-ENTRY CITIZENS
- 4.14 SPECIAL HUD FUNDING FOR VASH VOUCHERS
- 4.16 SPECIAL HUD FUNDING FOR FAMILY UNIFICATION PROGRAM (FUP)
- 4.17 SPECIAL HUD FUNDING FOR MAINSTREAM VOUCHERS
- 4.18 SPECIAL HUD FUNDING FOR EMERGENCY HOUSING VOUCHERS



The Housing Choice Voucher Program Administrative Plan

Approved By the HABC Board of Commissioners

HOUSING AUTHORITY OF BALTIMORE CITY

FY 2022 Housing Choice Voucher Administrative Plan

Released for Public Comment
Public Meeting: September 7, 2021
Approved by the HABC Board of Commissioners: February 17, 2022

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Chapter 1: STATEMENT OF POLICIES AND OBJECTIVES

1.1. <u>INTRODUCTION</u>

The Housing Choice Voucher (HCV) tenant-based assistance programs are federally funded and administered for the city of Baltimore by the Housing Authority of Baltimore City (HABC) through its HCV Program office.

Effective March 31, 2005, HABC entered into a Moving to Work Demonstration Agreement (MTW Agreement) with the United States Department of Housing and Urban Development (HUD). MTW is a national demonstration program established by Congress that allows Public Housing Authorities (PHAs) to develop and implement innovative and flexible solutions to meet local housing needs. HABC's Administrative Plan for the HCV Program identifies the policies and rules under which HABC's program will operate.

Administration of the HCV Program and the functions and responsibilities of the Housing Authority staff shall comply with HABC's Personnel Policy, this Administrative Plan and all applicable HUD Regulations as well as all federal, state and local laws and regulations.

1.1.1 Jurisdiction

The jurisdiction of HABC is primarily within the City of Baltimore's territorial boundary. However, HABC may administer rent subsidy payments and assistance programs in adjacent jurisdictions, as permitted by State Law, if that jurisdiction does not administer assistance programs and/or accept Housing Choice Vouchers from Baltimore City.

1.2. HABC MISSION AND VISION STATEMENT

To create and provide quality affordable housing opportunities in sustainable neighborhoods for the people we serve.

To create diverse and vibrant communities; to provide opportunities for self-sufficiency; and to build pathways for strong partnerships.

1.3. GOALS

1.3.1 The Four C's of HABC

1.3.1.1 Community

Improve the housing and quality of life for the people we serve.

1.3.1.2 Collaboration

Build upon our commitment to strong partnerships with residents, employees, government, nonprofit and business communities.

1.3.1.3 Customer Service

Increase efficiency, responsiveness, and accountability in the services we provide to our internal and external clients.

1.3.1.4 Communication

Create clear and consistent communication.

1.3.2 HABC Strategic Goals

1.3.2.1 Strategic Goal: Increase the availability of decent, safe and affordable housing.

Goal - Expand the supply of assisted housing.

Objectives:

- Apply for additional vouchers to serve special purpose needs;
- Leverage private or other public funds to create additional housing opportunities.

Goal - Improve the quality of assisted housing.

Objectives:

• Increase the number of rental units meeting and being maintained at HABC's housing quality standards.

Goal - Increase customer satisfaction.

Objectives:

- Concentrate on efforts to improve specific management functions:
 - Voucher Unit Inspection;
 - Conduct mobility counseling and offer housing search assistance;
 - Coordinate with communities to ensure housing quality standards of HCV properties;
 - o Adequately fund and staff Management Information Systems (MIS);
 - Expand housing opportunities with HCV;
 - o Improve provision of information and problem resolution to applicants, residents and property owners.

Goal - Increase Assisted Housing Choices.

Objectives:

- Provide voucher mobility counseling;
- Conduct outreach efforts to potential voucher landlords;
- Support voucher homeownership program.
- 1.3.2.2 Strategic Goal: Promote self-sufficiency and asset development of families and individuals

Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Increase the number and percentage of employed persons in assisted families;
- Provide or attract supportive services to improve recipients' employment opportunities;
- Coordinate with agencies that provide supportive services to increase independence for the elderly or families with disabilities.
- 1.3.2.3 Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

Goal: Ensure equal opportunity and affirmatively further fair housing.

Objectives:

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, sexual orientation, gender identity, marital status, and/or disability;
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, sexual orientation, gender identity, marital status, and/or disability;
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

1.3.3 Other HABC Goals

Consistent with Baltimore City Consolidated Plan (July 1, 2000 – June 2005), this plan is organized around the following goals:

- Expand housing opportunities for low- and moderate-income households;
- Expand homeownership opportunities;
- Cooperate with Community Development Corporations (CDC's) to revitalize communities;
- Support families making the transition from welfare to work;
- Maintain high performance standards for the HCV program.

1.4. PURPOSE OF THE PLAN

The purpose of HABC's HCVP Administrative Plan is to establish policies for carrying out the programs in a manner consistent with HUD requirements and the goals and objectives contained in the Agency Plan. HABC will revise this Administrative Plan as needed to comply with changes in Federal, State and local regulations and to meet new and revised HABC goals and objectives as developed under the MTW Agreement.

HABC may amend or modify any HABC policy, rule or regulation or other aspect of the plan. If the amendment or modification is a significant amendment or modification, HABC:

- (a) May not adopt the amendment or modification until HABC has duly called a meeting of its Board of Commissioners and the meeting, at which the amendment or modification is adopted, is open to the public; and
- (b) May not implement the amendment or modification, until notification of the amendment or modification is provided to HUD in accordance with the HUD/HABC MTW Agreement.

1.4.1 Note Re: Thompson Settlement Agreement (Thompson, et al. v. HUD, et al.)

This Administrative Plan provides the policies and procedures necessary for managing the Housing Choice Voucher Program (tenant- and project-based vouchers).

The Administrative Plan does not provide policies and procedures for the management of the vouchers set aside to ensure compliance with the Thompson Settlement Agreement entered into on behalf of the plaintiffs in the case of Thompson, et al. v. HUD et al.:

Thompson Settlement Agreement Vouchers

Voucher	Quantity
Tenant-Based (Mobility Vouchers)	1342
Home Ownership / Project-based Vouchers	496
Flexible Vouchers	150
Total	1988

The administration of the Partial Consent Decree vouchers is addressed in a separate document, the HABC Administrative Plan for Thompson v. HUD Partial Consent Decree Section 8 Programs (the Special Administrative Plan). However, that document will reference the Housing Choice Voucher Program Administrative Plan for specific policies regarding the general administration of the Housing Choice Voucher Program by HABC.

1.5. ADMINISTRATIVE FEE RESERVE

Expenditures from the Administrative Reserve (Operating Reserve) for other housing purposes shall be consistent with HABC rules and procedures.

1.6. RULES AND REGULATIONS

This Administrative Plan is set forth to define HABC policies for operation of the housing programs in the context of Federal laws and Regulations. All issues related to the HCV Program that are not addressed in this document, are governed by Federal Regulations, HUD Memos, or HUD Notices and guidelines, or other applicable laws. The policies in this Administrative Plan have been designed to ensure compliance with the HUD/HABC MTW Plan and all HUD-approved applications for program funding.

1.7. <u>TERMINOLOGY</u>

- The Housing Authority of Baltimore City is referred to as "HABC" or "Housing Authority" throughout this document.
- "Family" is used interchangeably with "Applicant" or "Participant" and can refer to a single person family.
- "Tenant" is used to refer to participants in terms of their relation to landlords.
- "Landlord" and "owner" are used interchangeably.
- The Non-Citizen Rule refers to 24 CFR Part 5 Subpart E Restricting Assistance to US Citizens and Eligible Immigrants.
- The Housing Choice Voucher Program refers to the merged Certificate and Voucher program effective as of October 1st, 1999.
- "HQS" means the Housing Quality Standards required by HUD regulations as enhanced by HABC.
- "Failure to Provide" refers to all requirements in the first Family Obligation. See "Denial or Termination of Assistance" chapter.
- See Glossary for other terminology.

1.8. FAIR HOUSING POLICY

It is the policy of HABC to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment.

HABC shall not on the basis of race, color, sex, religion, national origin, ancestry, age, familial status, marital status, handicap or disability, sexual orientation, gender identity, or source of income:

- Deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Programs;
- Deny any family the opportunity to apply for assistance, or deny any qualified applicant the opportunity to receive assistance suitable to their needs;
- Provide assistance that is different from that provided to others;
- Subject a person to segregation or disparate treatment;

- Restrict a person's access to any benefit enjoyed by others in connection with the Housing Choice Voucher Program;
- Treat a person differently in determining eligibility or other requirements for admission; or
- Deny any person access to the same level of services.

To further its commitment to full compliance with applicable Civil Rights laws, HABC will provide Federal, State, and local information to voucher holders regarding unlawful discrimination in housing and the recourse available to families who believe they are victims of such discrimination. Such information will be made available during the voucher briefing session. In addition, fair housing information and discrimination complaint forms will be made a part of the voucher holder's briefing packet and available upon request at HABC's Office located at 1225 West Pratt Street, Baltimore, MD 21223 and by HABC's Fair Housing & Equal Opportunity ("FHEO Office") Office located at 417 E. Fayette Street, Baltimore, MD 21202, (410) 396-4247.

HABC staff will be required to attend fair housing training, which will include the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Appropriate staff will attend local fair housing training update programs sponsored by HABC, HUD and other local organizations to keep current with new developments.

Fair Housing posters are posted throughout HABC offices, including in the lobby and interview rooms, in such a manner as being easily readable from a wheelchair. The equal opportunity logo will be used on all outreach materials.

Except as otherwise provided in 24 CFR § 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because HABC facilities are inaccessible to, or unusable by persons with disabilities.

HABC offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided through the Maryland Relay System. HABC provides sign language interpreters for meetings when requested as a reasonable accommodation.

HABC's FHEO Office is responsible for monitoring HABC's compliance with, and enforcing the requirements of, the fair housing laws and HABC's fair housing policy as set forth in this Administrative Plan.

Pursuant to Section 808 (e) (5) of the Fair Housing Act, HUD requires its funding recipients to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes under the Fair Housing Act include race, color, sex, religion, national origin, familial status, and handicap or disability. The purposed FSS Coordinator, if funded, shall affirmatively further fair housing by:

- Providing referral and advocacy services to program participants, assisting them in acquiring
 the training and employment assistance to enable them to secure and retain employment
 and thereby increase their income and their choice of housing; and
- Engaging program participants in financial literacy workshops, credit counseling and approved homeownership programs that will equip them to recognize housing discrimination and violations of their housing rights and will provide information on where and how to file a complaint.

1.8.2 Affirmatively Furthering Fair Housing – Family Self Sufficiency (FSS)

HABC will take reasonable steps to affirmatively further fair housing in the FSS program and will maintain records of those steps and their impacts. These steps will include: (1) advertising widely in the community for the coordinator position, (2) marketing the program to all eligible persons with limited English proficiency, (3) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities, (4) providing referrals to fair housing agencies, (5) informing participants of where to file a fair housing complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1-800-669-9777, and (6) since the program has a goal of homeownership or housing mobility, recruiting service providers in areas that expand housing choice to program participants. Record keeping will include, but not be limited to, the race, color, sex, religion, national origin, ancestry, age, familial status, marital status, handicap or disability, sexual orientation, or gender identity status of program participants.

1.9. <u>VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND/OR STALKING</u>

The purpose of this policy is to implement applicable revisions of the Violence Against Women Act of 2005 and the Violence Against Women Reauthorization Act of 2013 (collectively "VAWA"), and to set forth HABC's policies regarding domestic violence, dating violence, sexual assault and stalking. Notwithstanding VAWA's title, this policy is gender neutral.

1.9.1 Assistance to VAWA Victims

No applicant to HABC's HCV Program who has been a victim of domestic violence, dating violence, sexual assault, or stalking shall be denied admission into the program if they are otherwise qualified.

1.9.2 VAWA Provisions on Termination of Assistance to Victims

VAWA provides that "no person may deny assistance, tenancy, or occupancy rights to housing assisted under a covered housing program to a tenant solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household, of the tenant, or any guest or person under the control of the tenant, if the tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking."

HABC may exercise its authority to "bifurcate a lease for the housing in order to evict, remove, or terminate assistance to any individual who is a tenant or lawful occupant of the housing and who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual, without evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant of the housing."

VAWA does not limit HABC's authority to terminate the assistance of any participant if HABC "can demonstrate that an actual and imminent threat to other tenants or individuals employed at or providing service to the property would be present if the assistance is not terminated or the tenant is not evicted."

1.9.3 Victim Documentation

HABC will require an individual to submit documentation affirming any claim for which a participant family is facing termination of assistance because of the actions of a participant's household member, or other person under the participant's control who claims that he or she is the victim of actions that are related to domestic violence, dating violence, sexual assault or stalking.

HABC will accept one of three methods for certification of a claim under VAWA:

- A completed HUD Form 5382, which HABC will make available to a participant family upon request; and/or
- A Federal, State, tribal, local police or other law enforcement, or court record; and/or
- Documentation signed and attested to by an employee, agent, or volunteer of a victim service provider, attorney, a medical professional, or a mental health professional, from whom the victim has sought assistance in addressing domestic violence, dating violence,

sexual assault or stalking, or the effects of abuse, in which the professional attests under penalty of perjury to the professional's belief that the incident(s) in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, sexual assault or stalking has signed or attested to the documentation.

The required certification and supporting documentation must be submitted to HABC within fourteen (14) business days after HABC issues a written request for the documentation. The 14-day deadline may be extended at HABC's discretion. If the individual does not provide the required certification and supporting documentation within the 14 business days, or by the end of the approved extension period, HABC may proceed with termination of assistance.

For participants that have not yet been terminated, but HABC can demonstrate an actual and imminent threat to other participants, residents, or employees at or providing service to, the property, HABC will bypass the standard process and proceed with the immediate termination of the family's assistance.

1.9.4 Terminating Assistance of a VAWA Offender

Although VAWA provides termination protection for victims of domestic violence, dating violence, sexual assault and/or stalking, it does not provide protection for offenders. HABC may exercise its explicit authority to "evict, remove, or terminate assistance to any individual who is a tenant or lawful occupant of the housing and who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking against an affiliated individual or other individual without evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant of housing."

This authority supersedes any local, state, or other federal law to the contrary. However, if HABC chooses to exercise this authority, HABC will follow any procedures prescribed by HUD or by applicable local, state, or federal law regarding termination of assistance.

When the actions of a participant or other family member result in a decision to terminate the family's assistance and another family member claims that the actions involve criminal acts of physical violence against family members or others, HABC will request that the victim submit the required certification and supporting documentation in accordance with the stated timeframe. If the certification and supporting documentation are submitted within the required timeframe, or any approved extension period, HABC will terminate only the offender's assistance or require the household remove the offender from the lease and HAP Contract. If the victim does not provide the certification and supporting documentation, as required, HABC will proceed with termination of the family's assistance.

For participants that have not yet been terminated, but HABC can demonstrate an actual and imminent threat to other participants, residents, or employees at or providing service to, the property, HABC will bypass the standard process and proceed with the immediate termination of the family's assistance.

1.9.5 Confidentiality Requirements

All information provided to HABC regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law. HABC will maintain information regarding domestic violence, dating violence, sexual assault or stalking in a sealed envelope in the participant's file.

1.9.6 VAWA Definitions

The following definitions, which are related to VAWA, can be found in the definitions section of this Administrative Plan:

- Domestic Violence
- Dating Violence
- Sexual Assault
- Stalking
- Affiliated Individual

1.10. REASONABLE ACCOMMODATIONS POLICY

As set forth in HABC's Reasonable Accommodations Policy and Procedures, HABC is committed to ensuring that it policies and practices do not deny individuals with disabilities the opportunity to participate in, or benefit from, nor otherwise discriminate against individuals with disabilities in connection with the operation of HABC's housing services or programs, solely on the basis of such disabilities. Therefore, if an individual with a disability or persons associated with people with disabilities requires an accommodation, such as an accessible feature or modification to HABC policy, HABC will provide such accommodation, unless doing so would result in a fundamental alteration in the nature of the program or an undue financial or administrative burden. In such case, HABC will make another accommodation that would not result in a financial or administrative burden.

Written information regarding this policy and the procedures for making a request for a reasonable accommodation is available at the Customer Relations Center, Public Housing Management Offices, HABC's Central Office, HABC's Fair Housing and Equal Opportunity Office, and HABC's website.

Reasonable accommodations will be made for persons with a disability who require an advocate or accessible offices. A designee will be allowed to provide information on behalf of the person with the disability, but only with the permission of the person with the disability. Permission is required by HABC in the form of a notarized statement, or through oral verification when applicable, or through a Power of Attorney as approved by HABC's Office of Legal Affairs verifying permission of the person with a disability.

All HABC mailings will be made available in an accessible format upon request, as a reasonable accommodation.

The definitions of the terms "individual with a disability," as defined by Section 504, and "person with disabilities," as defined by the ADA, are set forth in the glossary to this Administrative Plan.

A reasonable accommodation may be requested by persons with disabilities or persons associated with people with disabilities by contacting the HABC HCVP Office in writing at 1225 W Pratt Street, Baltimore, MD 21223 or by calling (443) 984-2222 or by going online to www.HABC.org.

1.10.1 Verification of Disability

HABC may verify a requestor's disability only to the extent necessary to ensure that the requestor is qualified for the housing for which he or she had applied, is qualified for deductions used in determining adjusted income, is entitled to preferences that have been claimed, and that the requested accommodation is needed to address, or because of, a disability. HABC will not require persons requesting a reasonable accommodation to provide access to confidential medical records in order to verify a disability and will not require specific details about the disability. HABC may require documentation of the manifestation of the disability that causes a specific need for a specific accommodation or accessible unit.

1.10.2 Applying for Admission

Accommodations for applications will be made upon request from a person with a disability. For more information on applying for admission to the HCV Program, please refer to Chapter 3.

The application is completed at the eligibility appointment in the applicant's own handwriting, unless assistance is needed, or a request for accommodation is requested by a person with a disability. HABC staff will interview Applicants in order to review the information on the application

form. Verification of disability as it relates to 504, Fair Housing, or the Americans with Disabilities Act (ADA) reasonable accommodation will be requested at this time.

1.11. LANGUAGE INTERPRETATION, TRANSLATION OF DOCUMENTS, AMERICAN SIGN LANGUAGE (ASL) INTERPRETATION

HABC uses contractors to:

- Provide language interpretation services over the telephone;
- Translate documents;
- Provide American Sign Language interpretation; and
- Accessibility for the hearing impaired is provided through the Maryland Relay System (dial 7-1-1).

Information about how to request these services is available to HABC staff on HABC's intranet website, which also provides a link to documents translated by HUD.

1.11.1 Language Assistance

HABC will provide readers to assist persons with literacy barriers in completing the application and certification process, upon request.

1.12. HCV PROGRAM MANAGEMENT ASSESSMENT OBJECTIVES

HABC operates its housing assistance program with efficiency and can demonstrate to auditors that HABC is using its resources in a manner that reflects its commitment to quality and service. Under the HUD/HABC MTW Agreement, HCV program performance shall be measured in terms of compliance with the policies and procedures identified in the Administrative Plan.

The following areas are among those to be monitored and measured:

- Selection from the Waiting List
- Reasonable Rent
- Determination of Adjusted Income
- Utility Allowance Schedule
- HQS Quality Control Inspections
- HQS Enforcement

- Expanding Housing Opportunities
- Payment Standards
- Scheduled Re-examinations
- Correct Tenant Rent Calculations
- Pre-Contract HQS Inspections
- Scheduled HQS Inspections
- Lease-up
- Family Self-Sufficiency Enrollment and Escrow Account Balances (as applicable for FSS)

An HABC Supervisor or Quality Control Specialist, other than the person performing the work, will perform quality control reviews. The following indicators will be reviewed:

- Selection from the waiting list
- Rent reasonableness
- Determination of adjusted income
- HQS Enforcement
- HQS Quality Control

The annual sample of files and records will be drawn in a random manner and provide a clear audit trail. The minimum sample size to be reviewed will relate directly to each indicator. The internal auditor shall conduct an annual review to ensure that this process is being followed.

Supervisory staff will audit the following functions:

- Not less than 5% of reexaminations
- Not less than 5% of new applications
- Not less than 5% of rent adjustments
- Not less than 5% of HQS inspections

1.13. RECORDS FOR MONITORING HABC PERFORMANCE

In order to demonstrate compliance with its Administrative Plan, HABC will maintain records, reports and other documentation in accordance with agency requirements. This provision is intended to allow the internal auditor to monitor and assess HABC operational procedures to ensure objectivity, accuracy and conformance with agency requirements as defined within the Administrative Plan.

1.14. PRIVACY RIGHTS

Applicants and participants, including all adults (i.e. 18 years of age and older) in their households, are required to sign the HUD 9886 Authorization for Release of Information form or an HABC

equivalent. Completion of this form is required at every initial screening, interim, or regular reexamination. This document authorizes HABC to request income information from the State wage information collection agency and other Federal collection agencies in order to verify household income. This document incorporates the Federal Privacy Act Statement and does not provide authorization for the release of family information. Failure to sign the consent form will result in the denial of eligibility or termination of assisted housing benefits.

HABC policy regarding release of information is in accordance with State and local laws. Information to be supplied to a landlord, upon request, is limited to that specified in Chapter 9 of this plan.

HABC practices and procedures are designed to safeguard the privacy of applicants and program participants. All applicant and participant files will be stored in a secure location that is only accessible by authorized staff.

All files must be signed for when removed from the secured file storage area.

HABC staff will not discuss family information contained in files unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

Any and all information that would lead one to determine the nature and/or severity of a person's disability, or eligibility based on a criminal background check, must be kept in a separate folder and marked "confidential". The personal information in this folder must not be released except on an "as needed" basis in cases where an accommodation or a criminal eligibility determination is under consideration.

1.15. OUTREACH

Outreach efforts will include notification of the media and agencies listed in HABC's Administrative Plan regarding public notices (see section on opening and closing the waiting list in Chapter 3, "Applying for Admission").

1.15.1 Family Outreach

HABC may publicize and disseminate information to make known the availability of housing assistance and related services for eligible families. When HABC's waiting list is open, HABC may publicize the availability and nature of housing assistance for eligible families through, including but not limited to, the:

- Baltimore Sun
- Afro-American Newspaper
- City Paper

HABC's Website

HABC may extend outreach subject to determination of any minority group reaching 2% of the total population, based on the most recent census or amendment thereto.

To further enhance outreach, HABC may distribute fact sheets to the broadcasting media and may initiate personal contacts with members of the news media, with community service personnel, and with not-for-profit organizations servicing non-English speaking populations. HABC may also utilize public service announcements.

HABC may communicate housing opportunities and eligibility requirements to other service providers in the community, and advise them of housing eligibility factors and guidelines, so that they may refer their clients to HABC for housing assistance.

1.15.2 Owner Outreach

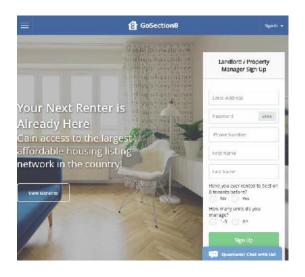
HABC makes a concerted effort to keep private owners informed of legislative and other changes in the tenant-based program, which are designed to make the program more attractive to owners.

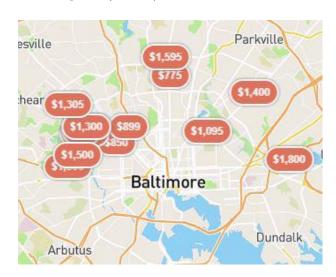
HABC encourages owners of decent, safe and sanitary housing units to lease to HCV families.

HABC encourages participation by owners of suitable units located outside areas of concentrations of poverty, minorities, and assisted units.

HABC conducts periodic meetings with participating owners to improve owner relations and to recruit new owners.

HABC hosts a free rental property listing service through <u>www.GoSection8.com</u> for landlords to list their rental properties for the Housing Choice Voucher Program participants:

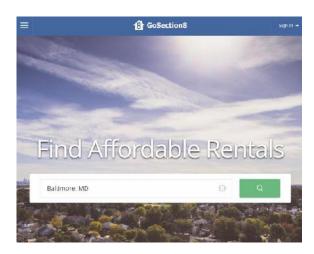




These listings are available to prospective participants through a link on HABC's website (www.HABC.org). Searches may be narrowed by using various criteria (location, type of unit, bedroom size of unit, etc.).

Internet-connected terminals accessing this service are available for use by program participants at the Housing Choice Voucher office.





The staff of HABC initiates personal contact with private property owners and managers by conducting formal and informal discussions and meetings.

Printed material is offered to acquaint owners and managers with the opportunities available under the program.

HABC participates in community-based organization(s) comprised of private property and apartment owners and managers.

HABC actively recruits property owners with property located outside areas of minority and poverty concentration and applies for exception payment standards if the HABC determines it is necessary to make the program more accessible within the jurisdiction of HABC.

HABC periodically evaluates the demographic distribution of assisted families to identify areas within the jurisdiction where owner outreach should be targeted. The purpose of these activities is to provide choicer and better housing opportunities to families. Voucher holders are informed of a broad range of areas where they may lease units inside the HABC jurisdiction, and given a list of landlords, or other parties, who are willing to lease units or help families who desire to live outside areas of poverty or minority concentration.

HABC shall periodically:

- Request the HUD Field Office to furnish a list of HUD-held properties available for rent.
- Develop working relationships with owners and real estate broker associations.

- Establish contact with civic, charitable and neighborhood organizations that have an interest in housing for low-income families and public agencies concerned with obtaining housing for displacements.
- Explain the program, including equal opportunity requirements and nondiscrimination requirements, as set forth in the Fair Housing Act, the Americans with Disabilities Act, and other housing-related civil rights laws, to real estate agents, landlords, and other groups that have dealings with low-income families or are interested in housing such families.

Chapter 2: ELIGIBILITY FOR ADMISSION

2.1. <u>INTRODUCTION</u>

This Chapter defines HABC criteria for admission and denial of admission to the program. The policy of HABC is to strive for objectivity and consistency in applying these criteria to evaluate the eligibility of applicants. HABC will review the information provided by the applicant carefully and without regard to factors other than those defined in this Chapter. Applicants will be provided the opportunity to explain their circumstances, to furnish additional information, if needed, and to receive an explanation of the basis for any decision made by HABC pertaining to their eligibility.

2.2. ELIGIBILITY FACTORS

HABC accepts applications only from applicants whose head of household, spouse or co-head, is at least eighteen (18) years of age or older, or an emancipated minor under State law.

To be eligible for participation, an applicant must meet HUD criteria, as well as any permissible additional criteria established by HABC.

HUD eligibility criteria are:

- An applicant must be a "family," as defined in 24 CFR § 5.403.
- An applicant must be income eligible as a family in accordance with 24 CFR § 982.201(b) and 24 CFR Part 5, Subpart F (i.e., below 50% of the jurisdictions median family income for the designated family size, or a low-income family within the parameters described in Section 2.5 of this chapter).
- An applicant must furnish Social Security numbers (SSN) for all family members.
 Verification of SSNs are required for all members in accordance with 24 CFR Part 5,
 Subpart B.
- At least one member of the applicant family must be either an U.S. citizen or have eligible immigration status before HABC may provide financial assistance, in accordance with 24 CFR Part 5, Subpart E.
- No family member has committed drug-related, violent, or other serious criminal activity within the last three years.
- No family member is subject to a lifetime registration requirement under a State sex offender registration program (Tier III), in accordance with 24 CFR § 982.553(a)(2)(i).

Initial admissions eligibility is determined based on the information supplied by the applicant during the eligibility process. The application will be reviewed for completeness and the data contained in the application will be reviewed for consistency (i.e., responses on the application are compatible with the definitions of the criteria used to determine program eligibility).

HABC emphasizes the fact that the initial application review is made only to place and rank the applicant on the waiting list. Eligibility factors will not be reviewed before the applicant is placed on the waiting list.

Final determination of eligibility is made after the information provided on the application has been verified and updated to reflect the applicant's current status. The final determination that is required prior to program admission must be conducted within sixty (60) days of voucher issuance.

Changes to an application may be updated online through the HCVP Applicant Portal (https://baltimore.applicants4housing.com).

2.3. FAMILY COMPOSITION

To be eligible for admission, the applicant must qualify as a "family." The definition of "family" is made regardless of actual or perceived sexual orientation, gender identity, or marital status. *Family* as defined by HUD includes, but is not limited to the following:

- A family with or without a child or children (if a child is temporarily absent from home due
 to placement in foster care, the temporary absence shall not be considered in determining
 the family composition and voucher size if the absence is presumed to be for less than
 180 days);
- An elderly family;
- A non-elderly person with a disability family;
- Any remaining eligible member(s) of an applicant family who was listed on the initial HCVP application;
- The remaining member of a participant family who was listed on the lease;
- A one-person household who is not elderly, displaced, or a person with disabilities;
- Two or more elderly persons or persons with disabilities living together;
- One or more elderly persons or persons with disabilities who have a live-in aide;

- Two or more persons who intend to share residency whose income and resources are available to meet the family's needs and who have a history as a family unit or show evidence of a stable family relationship.
- A group of persons consisting of two or more elderly persons or persons with disabilities living together, or one or more elderly person or person with disabilities living with one or more live-in aides is a family.

HABC determines if any other group of persons qualifies as a "family". A single person family may be:

- An elderly person;
- A displaced person;
- A person with a disability. Individuals may not be considered disabled for eligibility purposes solely on the basis of any drug or alcohol dependence;
- Any other single person.

A child who is temporarily away from home because of placement in foster care is considered a member of the family. This provision only pertains to the foster child's temporary absence from the home and is not intended to artificially enlarge the space available for other family members.

2.3.1 Household

Household is a broader term that includes additional people who, with HABC's permission live in the same unit (i.e. live-in aides, foster children, foster adults, etc.).

2.3.2 Head of Household

The head of household is the adult member of the household who is designated by the family as head, is wholly or partly responsible for paying the rent, and has the legal capacity to enter into a lease under State/local law. HABC does not permit a parent or legal guardian to co-sign any document on the applicant's behalf if the head of household is under eighteen (18) and, under State and local law, does not have the legal capacity to enter into a legally binding contract.

Emancipated minors who qualify under State law will be recognized as head of household if there is a court order declaring them as an emancipated minor. If there is no court order, HABC will consider other evidence of emancipation recognized under Maryland state law such as, for example, a person under eighteen (18) years old who is married or serving in the military.

A family may designate an elderly member or a member who is a non-elderly person with a disability as head of household solely to qualify the family for the allowance available for elderly persons and non-elderly persons with disabilities, provided that the person is at least partially responsible for paying the rent.

2.3.3 Spouse of Head of Household

Spouse means the marriage partner of the Head of Household.

For proper application of the Non-Citizen Rule, the definition of spouse is the marriage partner who, in order to dissolve the relationship would have to be divorced. The term "spouse" does not apply to boyfriends, significant others, or co-heads.

2.3.4 Co-Head

The co-head is an individual in the household who is equally responsible with the head of household for ensuring the family fulfills all its responsibilities under the Program, but who is not the spouse. A household may have either a spouse or co-head, but not both. A co-head never qualifies as a dependent and may not retain or receive a voucher while listed as a co-head on someone else's voucher. Co-heads must separately apply when the waiting list is open to receive their own, separate assistance.

2.3.5 Adult / Other Adult

An adult is an individual who is eighteen (18) years of age or older. Other adult means a family member, other than the head of household, spouse or co-head, who is eighteen (18) years of age or older. Foster adults and live-in aides are NOT considered other adults.

2.3.6 Elderly Person

An elderly person, as defined by HUD, is a person who is at least sixty-two (62) years of age.

2.3.7 Elderly Family

An elderly family is one in which the head, spouse, co-head, or sole member is an elderly person. Elderly families qualify for the elderly family allowance and medical allowance as described in Chapter 6, Section 6.3.2.

2.3.8 Non-Elderly Person with a Disability Family

A non-elderly person with a disability family is a family whose sole member, head of household, co-head, or head of household's spouse is a person with a disability who is under the age of sixty-two (62).

2.3.9 Live-in Aides

A household may include a live-in aide provided that such live-in aide:

- Is eighteen (18) years of age or older,
- Is essential to the care and well-being of an elderly person, or a person with a disability in the household as verified in writing by a health professional;
- Is not obligated for the support of the person(s);
- Would not be living in the unit except to provide care for the person(s); and
- Meets all applicable eligibility criteria.

A live-in aide is not considered to be an assisted family member and has no rights or benefits under the Program:

- The income of the live-in aide will not be counted for purposes of determining eligibility or level of benefits.
- Live-in aides are not subject to Non-Citizen Rule requirements.
- Live-in aides may not be considered as a remaining member of the participant family.
 Once the HCVP participant's assistance stops, the housing assistance payments stop for the household. Live-in aides will not be covered under HCVP assistance.
- Participants may not convert a live-in aide to a household member because such a conversion would allow individuals to circumvent the application process and the Housing Choice Voucher waiting list.
- If approved, only the live-in aide can reside in the unit with the applicant household. No other member of the live-in aide's family can live in the assisted unit.

Relatives are not automatically excluded from being live-in aides; however, requests to add relatives as live-in-aides must be approved by the Senior Vice President for HCVP, or designee. To be a live-in aide, relatives must meet all of the elements in the live-in aide definition described above. In addition, the prohibition against converting live-in aides to household members includes relatives approved as live-in aides.

Household members already listed on the lease who will remain in the unit will not be removed from the lease for purposes of becoming a live-in aide. Household members removed from the voucher may not be added back to the household as a live-in aide for a period of 12-months from

the date of removal, unless approved by the Senior Vice President for HCVP, or designee. Prior household members, who are being added back to the household as a live-in aide, after the required timeframe, will require HABC approval.

A live-in aide may only reside in the unit with the approval of HABC. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or caseworker, who must certify that a live-in aide is needed for the care of the family member who is elderly or a person with a disability.

After HABC approves the addition of a live-in aide on behalf of an applicant or participant, the applicant or participant must submit a specific live-in aide's name and information for approval by HABC.

Any person proposed as a live-in aide, including relatives, must be approved by the owner of the unit and pass HABC's eligibility and screening criteria. HABC has the right to disapprove a request for a live-in aide based on the "Other Eligibility Criteria" described in this Chapter.

HABC will require the live-in aide to execute an acknowledgment form in which the live-in aide agrees to abide by the terms and conditions of HCVP's family obligations. By signing the acknowledgement form, the live-in aide also agrees that the status as a live-in aide does not make the person a HCVP participant or give the person rights as a HCVP participant. Live-in aides who are denied admission are not eligible to request informal reviews or hearings.

At any time, HABC will refuse to approve a particular person as a live-in aide or may withdraw such approval if (24 CFR § 982.316):

- The person commits fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program;
- The person commits drug-related, violent, or other serious criminal activity; or
- The person currently owes rent or other amounts to HABC or to another PHA in connection with HCV or public housing assistance under the 1937 Act.

2.3.10 Guests

A guest is defined as a person temporarily staying in the unit with the consent of the participant or other member of the household who has express or implied authority to so consent on behalf of the participant and is not considered part of the applicant household. For more information on guests, please see <u>Chapter 15</u>, <u>Section 15.4.8</u>.

Guests should not remain in a unit in excess of fourteen (14) consecutive days, or a total of ninety (90) days in a 12-month period without HABC approval. For any guest who has income and who

remains in the unit for longer than the specified time, HABC will include that income in the calculation of total family income. HABC will determine the effective date for the participant's annual, biennial, or triennial review, whichever applies.

Guests who remain in a unit beyond this period are considered an unauthorized occupant, which constitutes a violation of Family Obligations (for more information on Family Obligations, see (<u>Chapter 15</u>, <u>Section 15.7</u>) and may result in the termination of assistance. Live-in aides may not have overnight guests.

Determination of unauthorized status may include a combination of the following:

- Absence of evidence of any other address will be considered verification that the visitor is a member of the household.
- Statements from neighbors and/or the landlord will be considered in making the determination.
- Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.
- Investigations completed by HABC, may result in the determination of unauthorized occupants.

2.3.11 Visitors

A visitor is defined as a person temporarily visiting the unit with the consent of the participant or other member of the household who has <u>NO</u> express or implied authority to so consent on behalf of the participant. Visitors are not considered a part of the applicant household. Please see <u>Chapter 15</u>, Section 15.4.9 for more information.

Any person, who has been in the unit more than fourteen (14) consecutive days without HABC approval, or a total of ninety (90) days in a 12-month period, will be considered as to be living in the unit as an unauthorized household member.

Determination of the unauthorized status may include a combination of the following:

- Absence of evidence of any other address will be considered verification that the visitor is a member of the household.
- Statements from neighbors and/or the landlord will be considered in making the determination.
- Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.

 Investigations completed by HABC, may result in the determination of unauthorized occupants.

2.3.12 Split Households Prior to Voucher Issuance

When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation, and the new families both claim the same placement on the waiting list, and there is no court determination, HABC makes the final decision taking into consideration the following factors, in order:

- Which family member applied as the head of the household;
- Which family unit retains the children or any disabled or elderly members;
- Restrictions that were in place at the time the family applied;
- The role of domestic violence in the split; and/or
- Recommendations of Social Service Agencies or qualified professionals such as children's protective services.

Documentation of these factors is the responsibility of the applicant families. If either family, or both families do not provide the documentation, HABC may deny their placement on the waiting list for failure to supply information requested by HABC.

2.3.13 Multiple Families in the Same Household

If two or more families living together apply as a family unit, they will be treated as a family unit.

2.3.14 Joint Custody and/or Temporary Guardianship of Dependents

Dependents subject to a joint custody arrangement that live with one person at least 51% of the time will be considered members of the household. "51% of the time" is defined as one hundred and eighty-three (183) days of the year, which do not have to run consecutively.

A self-certification is required of families who claim joint custody or temporary guardianship.

When both parents are on the Waiting List and both are trying to claim a child, the parent whose address is listed in the child's school records is the one allowed to claim the school-age child as a dependent.

In cases in which parents have joint custody of a child or children (50/50 custody), HABC grants the child deduction to the household of record provided by Baltimore City Public Schools or a private school. If the child is residing outside of HABC's jurisdiction, due to joint custody, the principal

household of record provided by the applicable school system is used to determine family composition, living arrangements and the standard deduction.

If the child is not enrolled in school, HABC will rely upon official records from daycare providers, tax records, and insurance providers such as Medicaid.

When more than one participant (already on the program) claims the same dependent(s) as a family member, the participant with primary custody at the time of the initial examination or reexamination will be able to claim the dependent(s).

Contested custody will be substantiated with proof of residency from the following sources:

- Court orders;
- Government benefits verification;
- IRS Income Tax Returns showing which family has claimed the dependent for income tax purposes;
- School records; and
- Other credible documentation.

HABC may make an exception to the Occupancy Standard and allow two assisted household's space for the same dependent where there is joint and physical custody; however, HABC will allow only one household to claim the dependent deduction. Exceptions to this policy will be reviewed on a case by case basis.

2.3.15 Foster Children and Foster Adults

Foster children are children approved by a state placement agency to live with the household. Foster adults are unrelated to the participant family, who are approved by a state placement agency to live with the household.

Foster children and foster adults who are living with an applicant or participant family are considered household members but not family members and therefore do not have residual rights to the youcher.

2.4. <u>INCOME LIMITATIONS</u>

In accordance with MTW guidelines, HABC will ensure that at least 75% of the program's Housing Choice Vouchers are issued to eligible families with income that does not exceed 30% of the area median income (AMI) in HABC's jurisdiction. To be income eligible the applicant must have an

annual income at the time of admission that does not exceed the following income limits established by MTW:

- A very low-income family such that the family income does not exceed 50 percent of the area median income for the area, adjusted for smaller and larger families, as determined by HUD.
- A low-income family such that the family income does not exceed 80 percent of the area median income for the area, adjusted for smaller and larger families, as determined by HUD as:
 - o "continuously assisted" under the 1937 Housing Act;
 - o physically displaced by rental rehabilitation activity under 24 CFR part 511;
 - o a non-purchasing family residing in a HOPE 1 or HOPE 2 project;
 - o a non-purchasing family residing in a project subject to a homeownership program under 24 CFR 248.173;
 - o displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract under 24 CFR 248.165.

To determine if the family is income eligible, HABC compares, at the time of admission, the annual income of the family to the applicable income limit for the family's size.

Families whose annual income exceeds the income limit will be denied admission and may request an informal review.

The applicable income limit used for initial issuance of a voucher is the highest income limit within the jurisdiction where the voucher will be used.

<u>Portability:</u> For initial lease-up at admission, families who exercise portability must be within the applicable income limit for the jurisdiction of the receiving PHA in which they want to live.

2.5. MANDATORY SOCIAL SECURITY NUMBERS [24 CFR 5.216, 5.218]

The applicant and all members of the applicant's household must provide the complete and accurate Social Security number (SSN) assigned to each household member, and the documentation necessary to verify each Social Security number.

Applicants are required to provide verification of Social Security numbers for all family members within ninety (90) calendar days of voucher issuance, if they have been issued a number by the

Social Security Administration. This requirement does not apply to non-citizens who do not contend they have eligible immigration status.

The Social Security number requirement also applies to persons joining the family after admission to the program.

Failure to furnish verification of social security numbers is grounds for denial or termination of assistance.

Individuals exempt from providing a Social Security number are:

- Individuals who do not have eligible immigration status; and
- Participants age sixty-two (62) years and older as of January 31, 2010, whose initial determination of eligibility began before January 31, 2010.

Participants who have previously disclosed a valid Social Security number during a recertification process will not be required to resubmit a Social Security number unless they are issued a new Social Security number by the Social Security Administration (SSA).

2.6. CITIZENSHIP/ELIGIBLE IMMIGRATION STATUS [24 CFR Part 5, Subpart E]

In order to receive assistance, at least one family member must be a U.S. citizen, national or non-citizen with eligible immigration status. Eligible immigrants are persons who are in one of the immigrant categories as specified by HUD and 42 U.S.C. § 1436(a).

For the Citizenship/Eligible Immigration requirement, the status of each member of the family is considered individually before the family's status is defined. HABC will verify the citizenship / immigration status of applicant's when other eligibility factors are determined.

- Mixed Families. An applicant family is eligible for assistance as long as at least one member
 is a citizen or eligible immigrant. Applicant families that include eligible and ineligible
 individuals are called "mixed families." Such applicant families will be given notice that
 their assistance will be pro-rated and that they may request a hearing if they contest this
 determination.
- All members ineligible. Applicant families that include no eligible members are ineligible
 for assistance. Such families will be denied admission and may request an informal
 hearing.
- <u>Non-citizen students.</u> As defined by HUD in the non-citizen regulations at 24 CFR 5.522 non-citizen students are not eligible for assistance. HABC will establish and verify that an applicant is a non-citizen student before denying eligibility.

 Appeals. For this eligibility requirement only, the applicant is entitled to a hearing exactly like those provided for participants.

2.6.1 Verification of Status before Admission

HABC will not provide assistance to families prior to the verification of eligibility for the individual, or at least one member of the family pursuant to this section. Applicants must submit required evidence of citizenship or eligible immigration status.

2.7. OTHER CRITERIA FOR ADMISSIONS [24 CFR 982.552]

All applicants will be processed in accordance with the MTW Agreement.

A family will be denied admission to the program if any member of the family fails to sign and submit consent forms for obtaining information required by HABC, including Form HUD-9886 or HABC equivalent (24 CFR § 982.552(b) (3)).

Applicants may not be admitted to the program if any member of the family has been evicted from federally assisted housing in the last five (5) years (24 CFR § 982.552(c) (1) (ii)).

HABC will apply the following criteria, in addition to the HUD eligibility criteria, as grounds for denial of admission to the program (24 CFR § 982.552):

- 1. The family must not have violated any family obligation (see 24 CFR § 982.551) during a previous participation in the HCV program (24 CFR § 982.552(c) (1) (ii)), or if for three years prior to final eligibility determination any member of the applicant household has been evicted from federally assisted housing for drug-related criminal activity (24 CFR § 982.553(a)(1)). However, HABC may admit the household if it is determined that:
 - The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program (documentation must be provided and approved by HABC); or
 - o That the circumstances leading to eviction no longer exist (for example, the criminal household member has died or is imprisoned).
- 2. The family must pay in full any outstanding debt owed to HABC or another PHA as a result of prior participation in any federal housing program within sixty (60) days of HABC notice to repay.

3. The family must be in good standing regarding any current payment agreement made with another PHA for a previous debt incurred, before HABC will allow participation in its HCV program.

HABC will check criminal history for all members, age fourteen (14) years and older, in the household to determine whether any member of the family has violated any of the prohibited behaviors as described in the "Denial or Termination of Assistance" chapter. The criminal history check will be performed at initial eligibility determination and at every re-examination thereafter.

If any applicant deliberately misrepresents the information on which eligibility or tenant rent is established, HABC will deny assistance and may refer the family file/record to the proper authorities for appropriate disposition. (See <u>Program Integrity Addendum</u>) If an applicant commits fraud, the applicant and the applicant's family may be prohibited from receiving future rental assistance for a period of up to 10 years and may be subject to prosecution by the local, state, or Federal prosecutor, which may result in being fined up to \$10,000 and/or serving time in jail.

Debts owed to HABC and information regarding termination from a federally assisted housing program will be maintained in the Enterprise Income Verification (EIV) system for a period of up to ten (10) years from the end of the household's participation date.

2.8. SCREENING PROCEDURES

All screening procedures shall be administered fairly and in such a way as not to discriminate on the basis of race, color, sex, religion, national origin, ancestry, age, familial status, disability, sexual orientation or gender identity, or source of income, and not to violate a right to privacy.

HABC will take into consideration any of the criteria for admission described in the "Denial or Termination of Assistance" chapter.

HABC will not screen family behavior or suitability for tenancy. HABC will not be liable or responsible to the owner or other persons for the family's behavior or the family's conduct in tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before HABC approval of the tenancy, HABC will inform the owner that screening and selection for tenancy is the responsibility of the owner.

The owner is responsible for screening families based on their tenancy histories, including but not limited to such factors as:

1. Payment of rent and utility bills.

- 2. Caring for a unit and premises.
- 3. Respecting the rights of other residents to the peaceful enjoyment of their housing.
- 4. Compliance with all other conditions of tenancy.

HABC will give the owner upon request:

- 1. The family's current and prior address as shown in HABC records; and
- 2. The name and address of the landlord (if known by HABC) at the family's current and prior address.

HABC will advise families on how to file a complaint if they claim that an owner has discriminated against them. HABC may advise the family to make a fair housing complaint. HABC may also report the owner to HUD (Fair Housing/Equal Opportunity) or the local Fair Housing Organization.

2.8.1 Enterprise Income Verification (EIV) Screening

HABC will conduct EIV screening for new applicants. An EIV Existing Tenant Search Record will be conducted on minor and adult members to identify applicants who may be receiving federal rental assistance. If the EIV Existing Tenant Search Record reveals that an applicant may be receiving another federal housing program subsidy, HABC will give the applicant an opportunity to explain any circumstances relative to his/her receiving another federal rental assistance subsidy. HABC may contact the respective Public Housing Agency (PHA) or owner to confirm the individual's program participation status before admission. HABC will not provide assistance to an applicant until confirmation is obtained that there will be no duplicate rental assistance.

HABC will conduct EIV screening on all adult household members to identify former residents of federally assisted rental programs who voluntarily or involuntarily left the program and have a reportable unfavorable status and/or owe money to a PHA or landlord as a result of participation in a HCV Program.

HABC will retain the search results with the application along with any documentation obtained as a result of contact with the applicant and the PHA and/or owner at the other location.

2.8.2 Debt Screening

HABC will conduct a debt screening on all members age eighteen (18) years and older.

Previous outstanding debts to HABC or any public housing authority resulting from a previous tenancy in public housing or participation in the HCV Program must be paid in full prior to admission. No payment agreement will be accepted. The applicant will be denied unless the

applicant pays the debt in full within sixty (60) calendar days from the date HABC notifies the applicant of the debt, unless HABC determines that mitigating circumstances exist or the debt cannot be collected under state law. A determination as to whether the debt may be collected shall be made in consultation with HABC's Office of Legal Affairs.

2.8.2.1 Denial for Debt to HABC

HABC may deny assistance to an applicant:

- 1. If the applicant family has current debt to HABC or another PHA, or a judgment against them in connection with participation in the HCVP or any other public housing assistance under the 1937 Act, for amounts paid to a HCVP landlord or owner under a HAP contract for rent, damages to the unit or other amounts owed by the applicant family under a lease and the amount is not fully repaid within sixty (60) calendar days from the date HABC notifies the applicant of the debt; and/or
- 2. If the applicant family has breached a repayment agreement with HABC or another PHA entered in connection with participation in the HCVP or any other public housing assistance under the 1937 Act, and the amount is not fully repaid within sixty (60) calendar days from the date of the screening appointment.

2.8.2.2 Mitigating Factors

Review and approval by the Senior Vice President of HCVP or designee, is required when admission is based on mitigating factors. HABC may consider the following factors when considering denial of assistance related to debt screening:

- 1. The effects that denial of assistance may have on other members of the family who were not involved in the action or failure to act.
- 2. Circumstances which led to the creation of the debt (i.e. death of a household member, layoff, medical expenses, etc.).
- 3. Current financial circumstances.
- 4. The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or a victim of domestic violence, dating violence, sexual assault or stalking.

2.9. CHANGES IN ELIGIBILITY PRIOR TO EFFECTIVE DATE OF THE CONTRACT

Changes that occur during the period between issuance of a voucher and lease up may affect the family's eligibility or share of the rental payment. The voucher size must be consistent with the family composition and may be altered prior to lease up.

2.10. INELIGIBLE FAMILIES

Families who are determined to be ineligible will be notified in writing of the reason for denial and given an opportunity to request an informal review, or an informal hearing if they were denied due to Non-Citizen Status. See "Complaints and Appeals" chapter for additional information about informal reviews and informal hearings.

2.11. PROHIBITED ADMISSIONS CRITERIA [24 CFR § 982.202(b)]

Admission to the program may not be based on:

- 1. Where a family lives prior to admission to the program. However, HABC may adopt a residency preference (see Chapter 4) to target assistance for families meeting specific criteria.
- 2. Where the family will live with assistance under the program.
- 3. Family characteristics, examples include:
 - o Discrimination because members of the family are unwed parents, recipients of public assistance, or children born out of wedlock.
 - o Discrimination because a family includes children (familial status discrimination).
 - o Discrimination because of age, race, color, religion, sex, or national origin.
 - Discrimination because of a disability.
- 4. Whether a family decides to participate in a family self-sufficiency program.
- 5. Other reasons as listed in the "Statement of Policies and Objectives" chapter under the Fair Housing and Reasonable Accommodations sections.

2.12. VIOLENCE AGAINST WOMEN ACT (VAWA)

<u>Victims of Domestic Violence, Dating Violence, Sexual Assault and/or Stalking (Public Law 109-162, Section 606)</u>

In compliance with the Violence Against Women Act of 2005 (VAWA 2005) and the VAWA Reauthorization Act of 2013 (VAWA 2013), collectively (VAWA), an individual's status regardless of sex, gender identity, or sexual orientation, as a victim of domestic violence, dating violence, sexual assault or stalking will not be the basis for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission (See Chapter 15, Section 15.11).

Chapter 3: APPLYING FOR ADMISSION

3.1. INTRODUCTION

The policy of HABC is to ensure that all applicants are treated in a fair and consistent manner. This Chapter describes the policies and procedures for completing an initial application for assistance and for placement and denial of placement on the waiting lists.

3.2. OVERVIEW OF THE APPLICATION TAKING PROCESS

The application process will involve two phases, the initial application and the eligibility determination. These phases are described in the following sections (3.2.1 and 3.2.2) in further detail.

3.2.1 Initial Applications

The first phase of the application process is the initial application for assistance. The purpose of this phase is to allow HABC to preliminarily assess family eligibility and to determine placement on waiting lists. Therefore, the applicant must provide an appropriate and complete application.

To provide specific accommodations for persons with disabilities, the information may be taken by a staff person over the telephone. It may also be mailed to the applicant and, if requested, it will be mailed in an accessible format.

Initial applications may not require an interview. The information on the application will not be verified until the applicant has been selected for eligibility determination. Eligibility will be determined during the second phase when the full application process is complete, and information is verified.

3.2.2 Eligibility Determinations

The second phase of the application process is eligibility determination. At this time, HABC verifies that the information provided to HABC by the applicant is current, and that all HUD and HABC eligibility factors are current in order to determine the applicant's eligibility for the issuance of a voucher. The household is not eligible for assistance until a final eligibility determination has been made.

Eligibility factors (see Chapter 2, Section 2.2 for additional factors) to be verified:

- 1. Applicant name indicates the designated head of household;
- 2. Family composition in order to determine the number of bedrooms for which the family qualifies under HABC's occupancy standards;
- 3. Local preference (see Chapter 4, Section 4.3);
- 4. Annual income (including assets and asset income);
- 5. Social Security numbers for all family members;
- 6. Information reported in applicant screening;
- 7. Citizenship or eligible immigration status;
- 8. Criminal background;
- 9. Prior debt to a federally and/or state assisted housing program;
- 10. Special Accommodation Needs;
- 11. Qualification for Local Preferences requested (see Chapter 4, Section 4.3)

3.3. OPENING THE WAITING LIST

HABC will utilize the following procedures for opening the waiting list.

When HABC opens the waiting list, HABC will provide notice as described in Chapter 1, Section 1.15 of this plan.

The notice will contain:

- 1. The dates, times, and the locations where families may apply.
- 2. The duration of time for which the Waiting List will remain open.
- 3. The programs (e.g., Housing Choice Vouchers, Project-Based) and purposes (e.g., income targeting, special categories) for which applications will be taken.
- 4. A brief description of the individual programs and purposes.
- 5. A statement that public housing residents must submit a separate application if they want to apply for HCV.
- 6. Limitations, if any, on those families who may apply.
- 7. Procedure for special accommodation applicants.

The notices will be made in an accessible format if requested. They will provide potential applicants with information that includes HABC's address and telephone number, and how to submit an application. If applicable, additional information on eligibility requirements, and the availability of local preferences will be identified.

Upon request from a person with a disability, HABC will identify one of the following agencies that can provide appropriate accommodation service:

- Baltimore Neighborhoods Incorporated (BNI)
- Community Housing Association
- First Call for Help
- Department of Disabilities
- HABC Division of Family Support Services
- Hearing and Speech Agency
- Making Choices for Independent Living (MCIL)
- Maryland Center for Community Development
- Maryland Disability Law Center (MDLC)
- Maryland Mental Health Partners
- Maryland Public Mental Health System
- Maryland Relay Center
- Maryland Technical Assistance Program
- Mayor's Commission on Disabilities
- Medical Rehabilitation Services
- MTA Bus/Metro/Call-a-lift
- MTA Mobility
- National Federation of the Blind
- Volunteers for Medical Engineering

The waiting list shall be open for the period necessary to cover projected turnover and new allocations over the next twelve (12) months. HABC may keep the waiting list partially open only for particular preferences. The decision to keep a waiting list partially open will be made by the Executive Director and the Board of Commissioners and based on need.

3.4. CLOSING THE WAITING LIST

HABC may close the waiting list (i.e., stop accepting applications) if there are enough applicants to fill anticipated openings for the next twelve (12) months. The waiting list will not be closed if it would have a discriminatory impact inconsistent with applicable civil rights and fair housing laws and regulations.

HABC may keep the waiting list partially open for particular preferences while the waiting list is closed to the general public. The decision to keep the waiting list open for particular preferences will be made by the Executive Director without the approval of the Board of Commissioners and

advertised in accordance with Chapter 1 of this Administrative Plan. HABC will announce the closing of the waiting list by public notice as described in Chapter 1, Section 1.15 of this plan.

During the time the waiting list is closed, HABC will discard any applications received that do not meet the criteria of the preference(s) for which the waiting list remains open.

3.5. APPLICANT STATUS WHILE ON WAITING LIST

Applicants are required to update any changes pertaining to their application or applicant status, including but not limited to household composition, address, and income online via the "Applicant Portal." The Applicant Portal may be accessed by computer, smart phone, tablet, or via the kiosks physically located at HABC on 1225 W. Pratt Street, Baltimore, MD 21223 by visiting https://baltimore.applicants4housing.com.

Changes in an applicant's circumstances while on the waiting list may affect the applicant's position on the waiting list (i.e. change in preference). When an applicant reports a change that affects placement on the waiting list, the waiting list will be updated accordingly.

Applicants are required to respond within ninety (90) calendar days to all notifications from HABC to update information on their application and/or to determine if the applicant is still interested in receiving assistance. If communication sent by HABC to an applicant is returned with a forwarding address, HABC will resend the notification to the new address.

3.5.1 Removal from the Waiting List

HABC will remove the names of applicants who do not respond in a timely manner to a communication by HABC and cannot be reached by email, mail, telephone, or via the contacts listed on their application. Failure to respond will result in the applicant being removed from the waiting list. No further action will be taken. The applicant's failure to respond prevents HABC from making an eligibility determination; therefore, no informal review is required. When an applicant is removed from the waiting list for failure to respond, HABC may reinstate the applicant if the lack of response was due to HABC error, or in response to an applicant's reasonable accommodation request (indicating that the failure to respond was due to a disability) or due to circumstances beyond the applicant's control.

HABC will also remove an applicant from the waiting list upon request by the applicant. In such cases, no informal review is required.

3.5.2 Notification of Eligibility (or Ineligibility) Process

If, after a review of the application, the family is determined to be preliminarily eligible they will be notified in writing, or in an accessible format upon request as a reasonable accommodation.

If the family is determined to be ineligible based on the information provided in the application, HABC will notify the family in writing (in an accessible format upon request as a reasonable accommodation), state the reason(s) they are ineligible, and inform them of their right to an informal review. Persons with disabilities may request to have an advocate attend the informal review as an accommodation (see <u>Chapter 18</u>).

3.6. TIME OF SELECTION

When funding is available, families will be selected from the waiting list in their determined sequence, regardless of family size, subject to income targeting requirements and special purpose voucher categories.

When there is insufficient funding available for the family at the top of the list, HABC will not admit any other applicant until funding is available for the first applicant.

3.7. <u>APPLICATION COMPLETION AND INTERVIEW</u>

The full application for housing assistance will be completed during the eligibility interview. Applicants will be required to furnish complete and accurate information as requested by the interviewer during the interview. HABC will obtain the information necessary to screen applicants for eligibility and process their applications.

All preferences claimed on the application or while the family is on the waiting list will be verified during the application completion and interview process. The qualification for a preference must exist at the time the preference is claimed and at the time of verification, because claim of a preference determines placement on the waiting list. If a preference is denied, the applicant will be re-sequenced on the waiting list in accordance with their verified preference status.

After the preference is verified, the applicant will be required to:

- Complete and sign the full application. Applicants may request a reasonable accommodation for completion of an application. HABC staff will interview the applicant to review the information on the full application form.
- Complete and sign all HABC required forms.

3.7.1 Requirement to Attend Interview

Applicants are required to attend an interview, unless a reasonable accommodation has been requested and approved. Applicants will be sent an eligibility appointment letter when they reach the top of the waiting list. The letter scheduling the interview will identify the documents the applicant is required to bring to the interview and the factors to be verified.

During the interview, HABC will verify applicant information, conduct eligibility screening and then make a determination about the applicant's eligibility for assistance. Screening will be carried out in accordance with the policies in this Administrative Plan.

HABC utilizes the application interview to discuss family circumstances in greater detail, to clarify information that has been provided by the family, and to ensure that the information is complete. The interview is also used to provide to the family information about the application process, verification process, and other HABC services or programs, which may be available.

All adult household members are required to attend the interview and sign the housing application. Exceptions may be made for verified students attending school out of state and for whom attendance would be a hardship.

If HABC is unable to reach the applicant, or the applicant misses two scheduled appointments, HABC will withdraw the application from the waiting list.

A reasonable accommodation will be made for persons with a disability who require an advocate or accessible offices, or to have the interview conducted at a location other than HABC's offices. A designee will be allowed to participate in the interview process, but only with permission of the person with a disability (see <u>Chapter 1, Section 1.10</u>).

The head of household, spouse, and co-head regardless of age, and all adult members must sign the HUD Form 9886 "Authorization for Release of Information / Privacy Act Notice" or HABC equivalent, the application and all supplemental forms required by HABC, the declarations and consent forms related to citizenship/immigration status and any other documents required by HABC. Applicants will be required to sign specific verification forms for information not covered by the HUD Form 9886 or HABC equivalent. Failure to sign required documents will be cause for denial of the application for failure to provide necessary certifications and releases as required by HABC.

Every adult household member must sign the application and a consent form to release criminal conviction records and to allow HABC to receive records and use them in accordance with HUD/MTW regulations.

If HABC determines at, or after the interview, that additional information or documentation is needed, HABC will request the documentation or information in writing. The applicant will be given ten (10) business days to supply the information. If the information is not supplied in this time period, HABC will provide the applicant a notification of denial for assistance (subject to reasonable accommodations). The applicant may be offered an opportunity to request an informal review.

If an application is denied due to failure to attend the interview, the applicant will be notified in writing that the application has been withdrawn from the waiting list. Instructions to re-apply when the waiting list opens, will be provided. The applicant will also be offered an opportunity to request an informal review (see Chapter 18).

3.8. VERIFICATION

The applicant must provide information needed by HABC to confirm eligibility and to determine the appropriate level of assistance. An applicant's intentional misrepresentation of any information related to eligibility, award of preference for admission, housing history, allowance, family composition or rent will result in the denial of admission.

Information provided by the applicant will be verified, using the verification procedures as described in the "Verification Procedures" chapter. Family composition, income, allowances and deductions, assets, full-time student status, eligibility and rent calculation factors, and other pertinent information will be verified. Verifications may not be more than sixty (60) days old at the time of voucher issuance.

3.8.1 Preference Verification

As part of the screening process, where applicable, HABC will identify the admissions preference under which the applicant was selected from the waiting list. HABC will verify that the applicant meets the claimed admissions preference.

Where an applicant was selected from the waiting list under a certain preference and where the applicant cannot verify eligibility for such preference, HABC will return the applicant to the waiting list with no preference. The applicant's position on the waiting list will be re-sequenced to reflect the revision to the preference status. The applicant will retain the original date and time of the application.

3.9. FINAL DETERMINATION AND NOTIFICATION OF ELIGIBILITY

After the verification process is complete, HABC will make a final determination of eligibility. This decision is based upon information provided by the family, the verification of the information by HABC, and the current eligibility criteria in effect. If the family is determined to be eligible, HABC will mail a notification of eligibility. A briefing will be scheduled for the issuance of a voucher and orientation to the housing program.

Applicants will be denied assistance and removed from the waiting list for the following reasons:

- Determined ineligible as a result of the initial phase of determination.
- The applicant does not respond to the requested information or cannot provide the information necessary for HABC to verify the applicant's status for program selection within a ten (10) business day period. HABC may grant an exception where the applicant's failure to respond is caused by the applicant's disability, any circumstances beyond the applicant's control, or other good cause as determined by HABC.
- The applicant is no longer eligible for the tenant-based program as a result of program selection verification that is conducted within sixty (60) calendar days of anticipated voucher issuance. (Note: The applicant is not removed from the waiting list based on preference change, but the preference will be changed and the application re-sequenced accordingly).
- HABC determines that fraud has been committed in completing the application.
- The applicant has refused offers of assistance under the voucher program.
- The applicant is a current participant in HABC's voucher program. However, HABC may not take any of the following actions because an applicant has applied for, or refused other housing assistance:
 - Refuse to list the applicant on HABC's waiting list for the remaining type of housing assistance.
 - o Deny admission preference for which the applicant is otherwise qualified.
 - o If an applicant has applied for and receives assistance, but still has applications for other programs under the same type of assistance, they will be removed from those waiting lists for which they are already receiving the same type of assistance.

3.10. SPECIAL CATEGORIES

The Executive Director of HABC is authorized to create special categories of applicants and/or program participants who apply for a voucher in order to meet special circumstances (e.g. consent decree requirements, legal opinions, etc.), and to develop and implement specific rules for accepting and processing applications from individuals identified as members of these special categories.

Vouchers or other assistance provided to Special Category participants may be restricted in their use. Examples of such restrictions may include use at specific sites or for certain HABC programs (such as the Homeownership Program).

Non-regulatory requirements may be modified for applicants and/or program participants designated as members of a "Special Category" group with homeownership rights.

3.11. SATISFACTION OF AN APPLICATION FOR HOUSING ASSISTANCE

Applications for housing assistance under the Housing Choice Voucher Program (tenant-based or project-based/MOD) shall be considered complete and satisfied upon an applicant's acceptance of a voucher or leased housing subsidy assistance from HABC.

If an application indicates a request for consideration for both Housing Choice Voucher Program sub-programs (tenant-based or project-based/MOD) and the applicant is offered and refuses assistance under one of these sub-programs but wishes to remain active on the waiting list for the other sub-program, then the applicant shall be removed from the waiting list for the sub-program refused but shall remain active on the waiting list for the other sub-programs.

If, during the eligibility process, an applicant's voucher for any sub-program is denied for cause, then the application shall be withdrawn from all Housing Choice Voucher program waiting lists.

Chapter 4: ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST

4.1. <u>INTRODUCTION</u>

It is HABC policy and an MTW requirement that families are placed on and selected from the waiting list in the proper order. Following such a practice will ensure that an offer of assistance is not delayed to any family or made to any family prematurely. By maintaining a viable waiting list, HABC will be able to perform the activities which will ensure that an adequate pool of qualified applicants will be available so that program funds are used in a timely manner.

HABC maintains two waiting lists for admissions to its Housing Choice Voucher program, and a separate waiting list for its low-income public housing program.

- 1. Tenant-Based Voucher (TBV) waiting list is established for applicants, if determined eligible, to be issued vouchers. The TBV waiting list will be maintained until expiration or exhaustion, and a new list is established.
- 2. Project-Based Voucher (PBV) waiting list for applicants, if determined eligible, to be placed in designated project-based units approved by HABC. The PBV waiting list will open and close based upon the need for an applicant pool based on project preferences, unit size, or Uniform Federal Accessibility Standards (UFAS) designation.

Except under special circumstances (as discussed later in this section), admissions are made from the waiting list in accordance with the criteria and process described in Chapter 7 of this Administrative Plan.

Any reference to the revised preferences that are not consistent with Chapter 4 will not be applicable. Revised changes to preferences in Chapter 4 should be reflected throughout the Plan and should be used in verification procedures as described in Chapter 7.

It is important to keep in mind the three underlying concepts for managing the waiting list:

- The waiting list uses a preference system for ranking applicants selected from the waiting list.
- Preferences are local criteria approved by the Board to give priority to certain special need populations. A preference is not a right and may be changed upon Board action. Any such change in preference criteria will result in an immediate change in the waiting list order.
- Only certified eligible applicants are selected from the waiting list based on applicant ranking. It is possible that a lower ranked applicant may be issued a voucher if the higher

ranked applicants are not yet certified eligible (i.e., await third party verification, or rescheduled after missing an interview appointment).

4.2. WAITING LIST

HABC uses a single waiting list for admission to its Housing Choice Voucher tenant-based assistance program. Except for Special Admissions, applicants will be selected from HABC's waiting list in accordance with policies, preferences and income targeting requirements defined in this Administrative Plan. HABC will maintain information that permits proper selection from the waiting list. The waiting list contains the following information for each applicant listed:

- Applicant name
- Family size
- Family unit size
- Date and time of application
- Qualification for any local preference
- Racial or ethnic designation of the head of household
- Annual (gross) family income
- Targeted program qualifications

4.3. ORDER OF SELECTION

HABC's method for selecting applicants from a preference category provides a clear audit trail that can be used to verify that each applicant has been selected in accordance with the method specified in the Administrative Plan and HUD Guidelines.

4.3.1 Local Preferences

Local preferences will be used to select families from the waiting list. The waiting list will be organized by local preference. Each local preference category will be organized by the prescribed ranking established at the time the waiting list was opened.

HUD Notice PIH 98-64 eliminated the requirement for public notice and a period for public comment when changing the HABC preference system. However, HABC must inform all applicants about available preferences and must give applicants an opportunity to show that they qualify for available preferences. If it is impractical to do so because of the length of the waiting list, HABC may provide notification to fewer than all applicants at any given time.

An applicant will not be granted any local preference if:

- Any member of the family has been evicted from housing assistance under a 1937 Housing
 Act program during the past three years because of drug-related criminal activity.
- If an applicant makes a false statement in order to qualify for a local preference.

Local preferences will be numerically ranked, with number 1 being the highest preference, in the following order:

4.3.2 Preference 1 – Referrals Only

A family currently in an HABC Public Housing unit where one or more family members has a disability and that family member has an immediate need for an accommodation related to that disability.

A family that is in need of emergency relocation due to municipal action or pending HABC land disposition.

Intimidated Victim, Intimidated Witness (IVIW) in need of immediate relocation based on the health and safety of one or more household members.

A family in need of replacement housing as a result of a natural disaster.

4.3.3 Preference 2

- **1.** Families with Children a household with at least one family member under eighteen (18) years of age;
- 2. Non-Elderly person with disabilities household a one or two adult household where no member is over sixty-two (62) years of age and at least one member has a disability.
- 3. Senior household a one or two adult household with at least one family member over sixty-two (62) years of age and no member is under eighteen (18) years of age.
- **4.** Other Family one or more adults where the head, co-head, or spouse do not have a disability and no family member is under eighteen (18) years of age or over sixty-two (62) years of age. The household may include an adult family member with disabilities.

Families with Children, Non-Elderly Persons with Disabilities, and Senior Household Preferences

HABC will grant preference to Families with Children, Non-Elderly Persons with Disabilities, and Senior households over Other Family households, unless Other Family households have a member that is of veteran status, an adult family member with disabilities, aged-out foster care youth, or verified unaccompanied homeless youth.

For purposes of this preference, aged-out foster care youth and verified unaccompanied homeless youth is defined as unaccompanied youth under twenty-five (25) years of age, or families with children and youth who do not meet any of the other HUD categories of homelessness but are homeless under other federal statutes, have not had a lease and have moved two (2) or more times in the past sixty (60) calendar days and are likely to remain unstable because of special needs or barriers.

Other Family households will only be considered for assistance after the waiting list is exhausted for Families with Children, Non-Elderly Persons with Disabilities, and Senior households.

4.3.4 Mainstream Voucher Program Preference

HABC was awarded a total of one-hundred and sixteen (116) tenant-based vouchers through the Mainstream Voucher Program.

The Mainstream Voucher Program will provide assistance to non-elderly persons with disabilities that qualify for any one of the following preference categories:

- 1. Transitioning out of institutional or other segregated settings;
- 2. At serious risk of institutionalization;
- 3. Homeless; or
- 4. At risk of becoming homeless.

Voucher recipients for the Mainstream Voucher Program under this award are any household that includes one or more non-elderly persons with disabilities, *and* who fall under one of the above-listed preferences. The admission preferences are applicable to all applicants on the tenant-based waiting lists.

HABC will screen its current tenant-based waiting lists for applicants meeting the preferences defined within this subsection. Applicants who meet the non-elderly disabled qualifications will be asked to come in to HABC's office for eligibility determination and to apply all verified preferences as outlined in this Chapter.

If all Mainstream Vouchers are being utilized, the applicant will receive a regular tenant-based voucher. If the applicant is not eligible for a Mainstream Voucher, they will be placed on the waiting list in accordance with their eligibility status as determined by HCVP.

4.3.5 Bridge subsidies

HABC will receive referrals from the Maryland Department of Disabilities through Money Follows the Person, for eligible clients for a period of three (3) years. This program will be similar to the Non-Elderly and Disabled Category II (NEDs Cat II) Program.

4.3.6 Residency Preference

HABC will grant priority within each of the preference categories to families who are residents of Baltimore City. Families who do not live in Baltimore City will only be considered for assistance after the waiting list of families who live in the City is exhausted, regardless of priority.

In accordance with HUD regulations at 24 CFR § 982.207(b)(v), applicants who are working or who have been notified that they are hired to work in Baltimore City must be treated as residents of Baltimore City. HABC may treat graduates of, or active participants in, education and training programs in Baltimore City as residents of Baltimore City if the education or training program is designed to prepare individuals for the job market.

4.3.7 Choice Mobility Preference for Residents of RAD Properties

HABC provides a Choice Mobility option to residents living in properties that converted under the Rental Assistance Demonstration (RAD) program to Project-Based Rental Assistance (PBRA). Under Choice Mobility, a resident of a RAD PBRA unit will have the opportunity to request an HCV, which may be used to move to a rental unit in the private rental market. This preference will be applied to residents that select the Choice Mobility option when they apply to HCVP's Choice Mobility tenant-based waiting list. Only residents living in HABC RAD PBRA properties will be eligible to apply for a tenant-based voucher under this preference.

4.3.7.1 RAD Project-Based Rental Assistance (PBRA) Sites

For residents living in sites subsidized under RAD PBRA, in order to qualify for a Choice Mobility HCV, the residents must reside at the RAD PBRA site:

- 24 months from the date of execution of the HAP Contract for the RAD property in which they live; or
- 24 months after the resident's move-in date at the RAD PBRA property.

Residents wishing to exercise the RAD Choice Mobility option must meet all HCVP eligibility criteria, including the program income requirements and the screening criteria, in effect at the time of the tenant-based voucher issuance.

4.3.7.2 RAD Project-Based Voucher (PBV) Sites

For residents living in properties that converted under RAD with Project-Based Voucher (PBV) subsidy, a family may elect to terminate its assisted lease at any time after its first year of occupancy and apply for Choice Mobility tenant-based voucher assistance. HABC is required to offer the voucher assistance, if available. Under RAD PBV, HABC can, but is not required to, establish a voucher inventory turnover cap, if as a result of RAD, HABC has project-based more than 20 percent of its authorized ACC units. If HABC adopts a turnover cap, HABC would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of the RAD PBV projects. In this case, HABC must create and maintain a waiting list to track requests from eligible households for Choice Mobility vouchers in the order in which the requests were received.

HABC may not apply a voucher inventory turnover cap to families residing in traditional PBV units, even if those units are in the same project with RAD PBV units.

4.3.8 Preference Verification

If the preference verification indicates that an applicant does not qualify for the preference, the applicant will be returned to the waiting list without the local preference and given an opportunity for an informal review.

If, at the time the family applied, the preference claim was the only reason for placement of the family on the list and the family does not verify their eligibility for the preference as of the date of application, the family will be removed from the list.

If the applicant falsifies documents or makes false statements in order to qualify for any preference, s/he will be removed from the waiting list. Applicants making false statements to claim a preference will be ineligible for assistance for three (3) years from the date of their selection from the waiting list.

4.3.9 Preference Modification

Changes in an applicant's circumstances while on the waiting list, may affect the family's entitlement to a preference. Applicants are required to notify HABC by submitting their changes online via the

Applicant Portal. An alternative method or a reasonable accommodation may be requested, in the event a computer is not accessible by the applicant.

When an applicant claims an additional preference, s/he will be placed on the waiting list in the appropriate order determined by the newly claimed preference, if that preference is of a higher ranking.

The exception to this is, if at the time the family applied, the waiting list was only open to families who claimed that preference. In such case, the applicant must verify that they were eligible for the first preference before they are returned to the waiting list with the new preference.

4.3.10 Preference Denial and Appeal

If HABC denies a preference, HABC will notify the applicant in writing of the reasons why the preference was denied and offer the applicant an opportunity for an informal review. If the preference denial is upheld as a result of the informal review, or if the applicant does not request an informal review, the applicant will be returned to the waiting list without benefit of the preference. However, if at the time the family applies while the waiting list is only open to families who claim that preference, and the applicant cannot prove that preference, the applicant will not be returned to the waiting list. Applicants may exercise other rights if they believe they have been discriminated against.

4.4. UPDATING THE WAITING LIST

Applicants are required to inform HABC online of changes in address via the Applicant Portal, or through alternative methods (i.e. in writing to, or by visiting the HCVP Office to report such changes).

HABC's tenant-based voucher waiting list opened during the period of October 22-30, 2014. All selected applicants and non-selected applicants were notified of their waiting list status upon completion of the random selection. Selected applicants have been placed in one of the Preference 2 categories.

Each household application of the four preference household categories defined above will be assigned a unique number for the respective categories through a computer-generated waiting list. All applications submitted during the waiting list opening period (October 22-30, 2014) have equal date and time and the representative random selection created a unique list number for each selected applicant.

Any reference to a non-online application process is not applicable for an opening of the tenant-based waiting list during any period, as specified by HABC.

The new list created from this preliminary pre-application process will continue to be utilized until it has been exhausted or until its expiration, whichever comes first.

Upon establishment of the waiting list, it is necessary to have current and updated applicant information. HABC periodically reviews the Waiting List to determine if an update and purge are necessary. If an update is needed, HABC will mail update questionnaires to families on the Waiting List. The mailing will ask for current information and confirmation of continued interest. If a letter is returned by the Post Office without a forwarding address, the applicant will be removed without further notice, and the envelope and letter will be maintained in the file. If a letter is returned with a forwarding address, it will be re-mailed to the address indicated. Eligible applicants who respond to the questionnaires within thirty (30) calendar days will be maintained on the Waiting List. Families that do not respond will be withdrawn from the Waiting List.

Questionnaires will be made available in accessible format upon the request of a person with a disability. An extension to reply to the update questionnaires will be considered as a reasonable accommodation if requested by a person with a disability.

In addition, if the applicant did not respond to HABC's update questionnaire because of a disability, HABC will reinstate the applicant in the applicant's former position on the Waiting List. Their placement on the Waiting List will be based on their original preference on the original application, as long as the original preference is still applicable.

4.5. REINSTATEMENT TO THE WAITING LIST

When applicants are removed/withdrawn from the Waiting List because they could not be reached, and they later contact HABC regarding their continued interest in the HCV Program, they will be reinstated to the Waiting List if they contact HABC within twelve (12) months from the date of their removal from the list. Upon reinstatement, they will be placed back on the waiting list in their original position.

In addition, if the applicant did not respond to HABC's update questionnaire because of a disability, HABC will reinstate the applicant in the applicant's former position on the Waiting List. Their placement on the Waiting List will be based on their original preference on the original application, as long as the original preference is still applicable.

4.6. INCOME TARGETING

In accordance with the Quality Housing and Work Responsibility Act (QHWRA) of 1998, for each fiscal year HABC will reserve a minimum of 75% of its Section 8 new admissions for families whose income does not exceed 30% of the area median income. HUD refers to these families as "extremely low-income families." HABC will admit families who qualify under the extremely low-income limit in order to meet this requirement, regardless of preference. This practice shall be referred to as income targeting. Where necessary to meet this requirement, HABC will skip applicants on the waiting list until the first extremely low-income family is reached.

HABC income targeting requirement does not apply to low-income families who are continuously assisted as defined in the 1937 Housing Act.

HABC is also exempted from this requirement where HABC is providing assistance to low- income or moderate-income families entitled to preservation assistance under the tenant-based program as a result of a mortgage prepayment or opt-out.

If the family's verified annual income, at final eligibility determination, does not fall under the "extremely low-income" limit and the family was selected for income targeting purposes before a family with a higher preference, the family will be returned to the waiting list.

4.7. SPECIAL PROGRAM CATEGORIES

When HUD awards special funding for certain family types, families who qualify are placed on the regular waiting list. When a specific type of funding becomes available, the waiting list is searched for the first available family meeting the special funding criteria.

4.8. SPECIAL ADMISSIONS

Admission of a family that is not on HABC's waiting list, or without considering the applicant's waiting list position, is called a special admission. Special admissions occur when HUD gives HABC program funding for families living in specified units as opposed to a special category of persons on the waiting list, unless the program provides for referral applicants from applicable government agencies or service provider organizations. Examples are funding for families displaced because of demolition or disposition of federally assisted property, or displacement from a federally assisted project due to termination of assistance or any other event.

The tenant-based assistance program rules provide that when HUD awards HABC program funding that is targeted for families that live in specified units, HABC must use the assistance for families

living in these units. HABC may admit a family that is not on HABC waiting list, or without considering the family's waiting list position; and, in accordance with <u>24 CFR § 982.203(a)</u>.

HABC must maintain records showing that the family was admitted with HUD targeted assistance.

HABC does not use (nor is it permitted to use) this special method of admissions for any purpose other than when HUD gives HABC program funds for families living in specified units. For example, HABC does not use special admissions to solve over-or under-crowded situations, for persons that require terminal ill care, rehabilitation purposes, etc. However, HABC may use its system of local preferences (approved by the Board) to address these situations.

If HUD awards funding targeted for families living in specific units, HABC is to use the funding for that purpose. HABC will use the targeted funding in accordance with the conditions imposed when the funds are awarded to and accepted by HABC.

In most instances, funding for special admissions is only restricted on initial use for a particular family. If HUD does not require continued use of the funding for a special purpose, the funding is released from special requirements upon turnover. At such time, funding becomes available for general use in HABC's Housing Choice Voucher Program. Re-issuance of these vouchers will be made in accordance with waiting list procedures.

HABC is to maintain documentation of each special purpose funding increment describing the special purpose, the units and families associated with the units, and information on requirements regarding continued use. HABC must also maintain an accounting of each voucher issuance, turnover and placement in the general voucher program.

4.9. SET-ASIDE OF VOUCHERS FOR FAMILIES WITH DISABILITIES

HABC established the Enhanced Leasing Assistance Program (ELAP), which is being implemented by an outside contractor, pursuant to the consent decree entered in *Bailey v. Housing Authority of Baltimore City*, JFM-020CV-225 and *United States of America v. Housing Authority of Baltimore City*, JFM-02-CV-03107 (Bailey Consent Decree). The ELAP provides housing search assistance non-elderly persons with disabilities (NEDs) as defined in and in accordance with the Bailey Consent Decree who received tenant-based vouchers or are referred to units subsidized with project-based vouchers set-aside for NEDs (see below).

The Services provided through the ELAP include:

- Administration of a funding stream for reasonable application fees, security deposits, and utility hook-up fees;
- Housing search assistance;
- Landlord/tenant negotiations and facilitating implementation of requests on behalf of the Program participants for reasonable accommodations, including retrofitting units to make them accessible or to add accessibility features in an amount not to exceed \$5000 per unit;
- Referrals to service providers and non-profit organizations to assist the voucher holder in obtaining long-term housing stability (no guarantees will be made regarding the ability of the service providers to provide the requested services or in being able to identify appropriate service providers for all ELAP participants).

Eight hundred and fifty (850) tenant-based Housing Choice Vouchers and five hundred (500) Project-Based Vouchers were set-aside for issuance to NEDs pursuant to the Bailey Consent Decree. The 850 tenant-based vouchers were offered in order by date and time of application to NEDs on the waiting list who were found eligible for the HCVP and who participated in the ELAP. On turnover, these 850 tenant-based vouchers were leased to the next eligible NED applicant until 102,000-unit months leased to NEDs was achieved. This goal was achieved in November 2018. Therefore, the 850 tenant-based vouchers are no longer available exclusively to NEDs and are now being offered to the next eligible family upon turnover.

Five hundred (500) Housing Choice Project-Based Vouchers were set-aside for issuance to owners of rental properties and developers that agreed to create and maintain project-based units for NEDs. These vouchers are offered, in order by date and time of application, to NEDs on HABC's project-based voucher waiting list who have been found to meet the Housing Choice Voucher Program eligibility criteria and, while it is in existence, who are participating in the ELAP. If a NED participant moves out of one of the units subsidized by one of these vouchers, the unit will be offered to the next eligible NED referred by HCVP for the ELAP.

4.10. <u>SET-ASIDE VOUCHERS FOR FAMILIES WITH CHILDREN WITH ELEVATED BLOOD</u> LEAD LEVELS

Subject to availability of funding, two hundred fifty (250) Housing Choice Vouchers will be set-aside for issuance to families with children with elevated blood lead levels as determined and referred by Green and Healthy Homes, Inc. (GHHI), the Maryland Department of the Environment, or other appropriate agency.

4.11. SET-ASIDE VOUCHERS FOR CHRONICALLY HOMELESS HOUSEHOLDS

Subject to availability of funding, up to nine hundred (900) Housing Choice Vouchers will be set-aside for issuance to eligible chronically homeless households with a preference on fifty (50) families with at least one child under the age of eighteen, as determined and referred by the Mayor's Office of Homeless Services. Two hundred (200) of these vouchers are set-aside for the rolling RFP for Project-Based units designated for the homeless population.

4.12. <u>SET-ASIDE VOUCHERS FOR RE-ENTRY CITIZENS</u>

Subject to availability of funding, two hundred fifty (250) Housing Choice Vouchers will be set-aside for issuance to previously incarcerated citizens with prior convictions prohibiting them from finding safe and affordable housing as determined and referred by the Mayor's Office of Homeless Services. In FY2021, HABC received approval through a Board Resolution to modify the screening criteria for these Re-Entry Vouchers to waive felony and misdemeanor convictions from criminal background searches, unless federally mandated prohibitions apply.

4.13. SET-ASIDE VOUCHERS FOR HEALTHY OPPORTUNITIES PROGRAM (HOP)

In FY2020, HUD approved HABC's request to set aside up to one-hundred and fifty (150) vouchers to assist current Housing Choice Voucher families with children who are facing health related issues due to their current living situations. Subject to availability of funding, HCVP will assist families with moving into opportunity neighborhoods that would improve the family's overall health. Families will be identified by HABC's partner agencies that specialize in the health industry, and opportunity areas may differ based on the needs of each participating family. These vouchers are only for families who are willing to move to opportunity areas to improve their overall health. HABC will evaluate the results of this program and may select new participants upon turnover.

4.14. SPECIAL HUD FUNDING FOR VASH VOUCHERS

HABC was awarded five hundred eighty six (586)* Veterans Affairs Supportive Housing (VASH) vouchers, funded by HUD, to provide rental assistance to homeless veterans and their immediate families. Referrals are received from the local Veterans Affairs Medical Center which is also responsible for providing intensive case management services to these veterans and their families.

^{*}This number is subject to annual incremental increases established by HUD.

4.15.1 VASH Graduate Program

HABC will receive referrals from the Veterans Affairs (VA) for active participants housed under the VASH Program who have successfully completed case management services as determined by the VA, to receive permanent tenant-based subsidy, subject to funding availability.

4.15. SPECIAL HUD FUNDING FOR NEDS CATEGORY II VOUCHERS

HABC was awarded forty (40) vouchers, funded through a grant from HUD, to provide rental assistance to non-elderly persons with disabilities who are transitioning into the community from nursing homes or other health care institutions. Referrals are received from The Coordinating Center or other appropriate agency. The department also provides care/case management to referees and links them to needed health and social services.

4.16. SPECIAL HUD FUNDING FOR FAMILY UNIFICATION PROGRAM (FUP)

HABC was awarded one hundred (100) vouchers funded through a grant from HUD to provide rental assistance to:

- Families in jeopardy of losing custody of children due to inadequate housing;
- Youths aging out of the foster care system.

For more information on this program, please contact the Public Child Welfare Agency for Baltimore City.

4.17. SPECIAL HUD FUNDING FOR MAINSTREAM VOUCHERS

HABC was awarded a total of one-hundred and sixteen (116) vouchers funded through a competitive process approved by HUD to provide rental assistance to households that include non-elderly/disabled (NED) persons who are:

- 1. Transitioning out of institutional or other segregated setting;
- 2. At serious risk of institutionalization;
- 3. Currently homeless;
- 4. At risk of becoming homeless.

Applicants are pulled from the existing waiting list for preference verification to determine if they meet the preferences of this special program. Upon exhaustion of the waiting list for all Mainstream eligible applicants, HCVP may accept applications referred through partner agencies.

4.18. SPECIAL HUD FUNDING FOR EMERGENCY HOUSING VOUCHERS

In FY2021, HABC was awarded two hundred seventy-eight (278) Emergency Housing Vouchers (EHVs). These vouchers are subject to PIH Notice 2021-15 Emergency Housing Vouchers – Operating Requirements. Re-issuance of these vouchers upon turnover will be prohibited after September 30, 2023. Listed below are the criteria that must be met according to the "Individual and Family Eligibility under Qualifying Categories" as described in the PIH Notice:

In order to be eligible for an EHV, an individual or family must meet one of four eligibility categories:

- Homeless
- At risk of homelessness
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

Per PIH Notice 2021-15, Operating Requirements, verification that the individual or family meets one of these four eligibility categories is conducted by the Continuum of Care (CoC) who then makes direct referrals from the CoC's Coordinated Entry System to HABC. The Mayor's Office of Homeless Services (MOHS) is the designated CoC partner for these EHVs. MOHS will verify eligibility and refer applicants to HABC for EHV screening.

Individuals and families referred for EHVs will be prioritized in the following order:

- 1. Youth (ages 18-24);
- 2. Rapid Rehousing households that are not able to maintain housing without EHV assistance (subsidy ending within 365 days);
- 3. Households that are victims of domestic violence;
- 4. Families with children experiencing homelessness as defined in HUD Continuum of Care Program regulations at 24 CFR §578.3; and
- 5. Individuals experiencing homelessness in shelter or street settings (adults only).

Upon receipt of each referral, HABC will conduct criminal background screenings. Applicants may be eligible for admission unless:

- Any household member has ever been convicted of a drug-related criminal activity for manufacture or production of methamphetamine on the premise of federally assisted housing.
- Any household member is subject to a lifetime registration requirement under a State sex offender registration program.
- Any household member has been convicted of a felony within the past twelve (12) months.
 The period of ineligibility for felony convictions starts from the date of conviction or the date of release of incarceration, whichever is later.
 - Per the Notice, HABC may not deny an EHV applicant admission regardless of whether HABC determines that any household member is currently engaging in or has engaged in during a reasonable time before the admission, drug-related criminal activity.
- Any household member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program within the previous twelve (12) months.

4.19. PROJECT BASED PROGRAM

(See Chapter 20)

4.20. HOMEOWNERSHIP

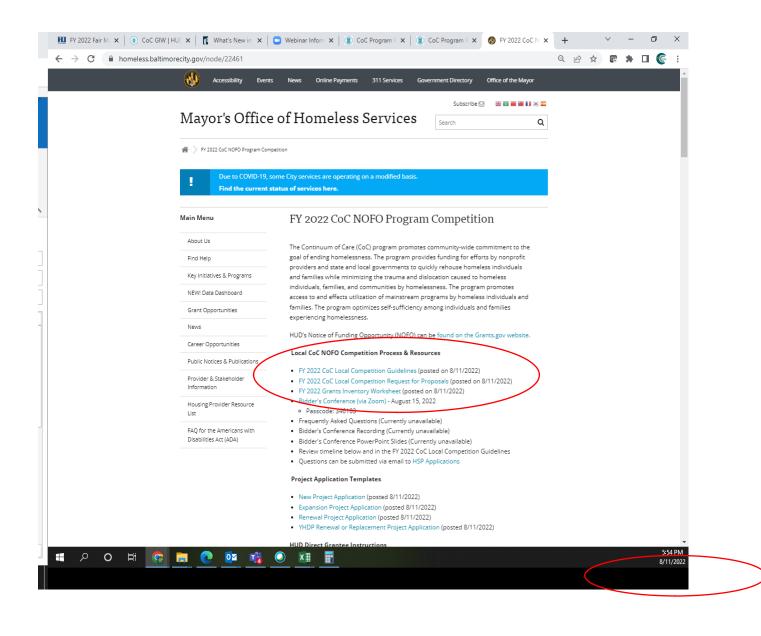
(See Chapter 19)

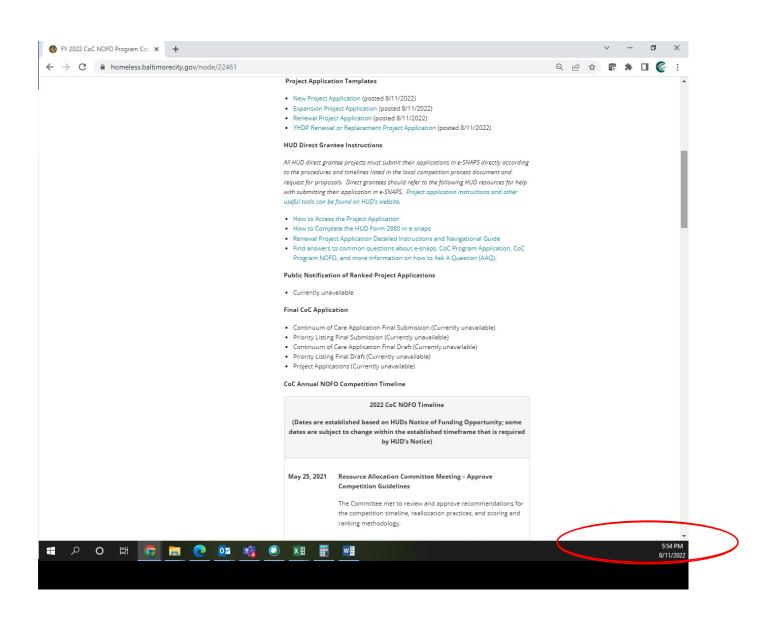
FY 2022 CoC Competition MD-501

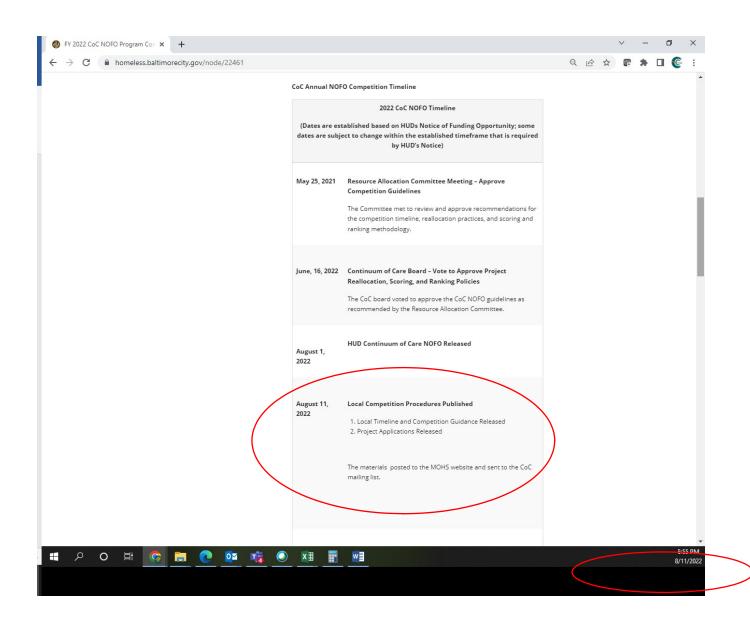
Attachments for the FY 2022 CoC Application 1E-1– Web Posting of Your CoC's Local Competition Deadline–Advance Public Notice.

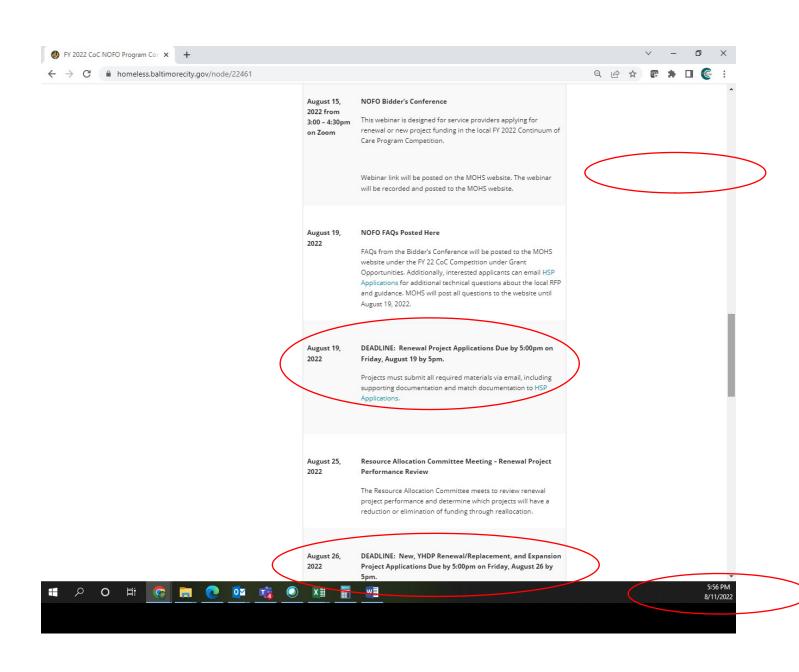
Attachments Include the Following:

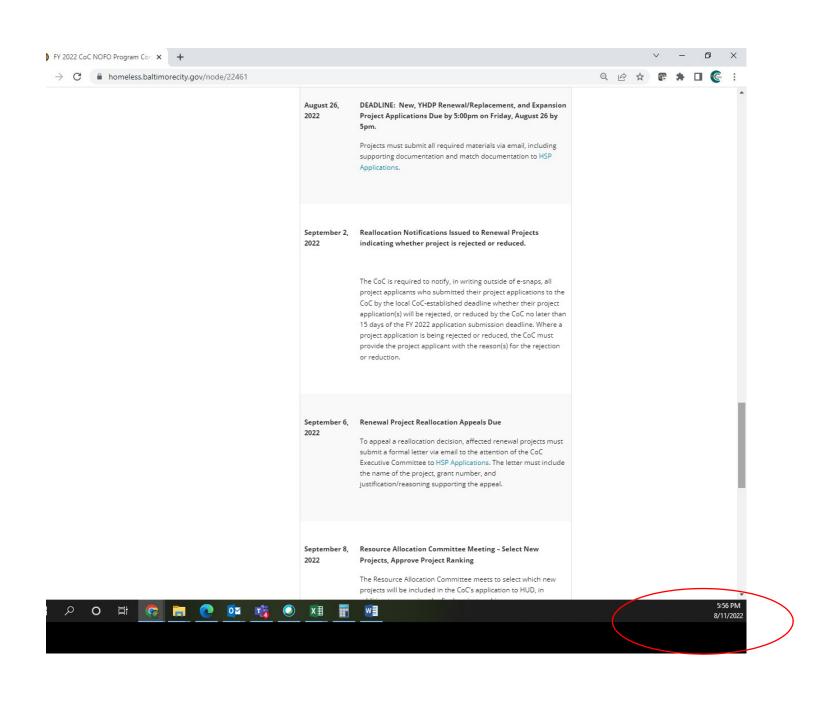
- Screenshot of Collaborative Applicant Website Posted August 11, 2022: https://homeless.baltimorecity.gov/node/22461
 - Local Competition Guidelines Baltimore City Continuum of Care Posted August 11, 2022
 - Local RFP Baltimore City Continuum of Care Posted August 11, 2022
 - TIMELINE:
 - o Renewal Deadline August 19, 2022
 - o New Project Deadline August, 26, 2022
- 2. Social Media Announcement Posted August 11, 2022 & MailChimp Email Notification

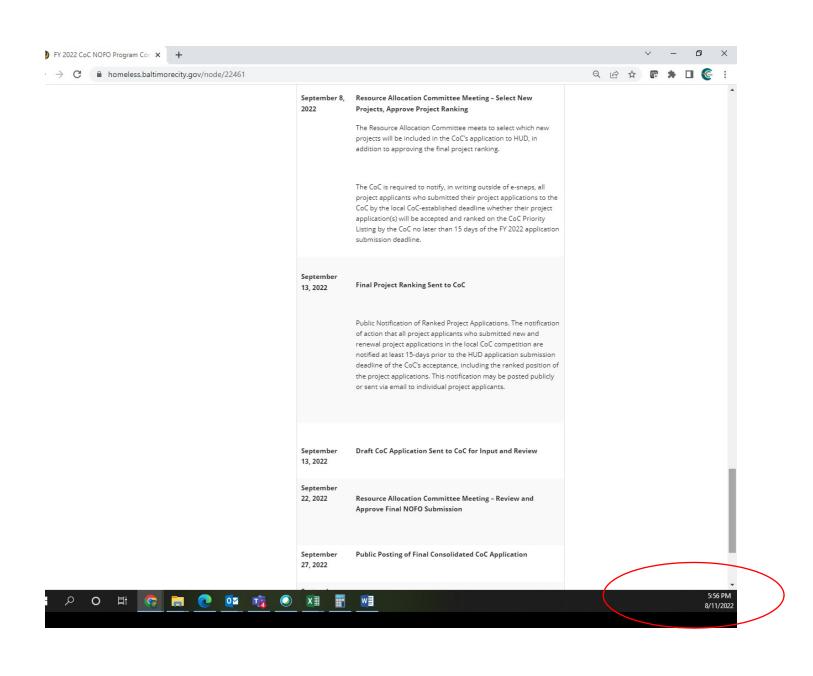


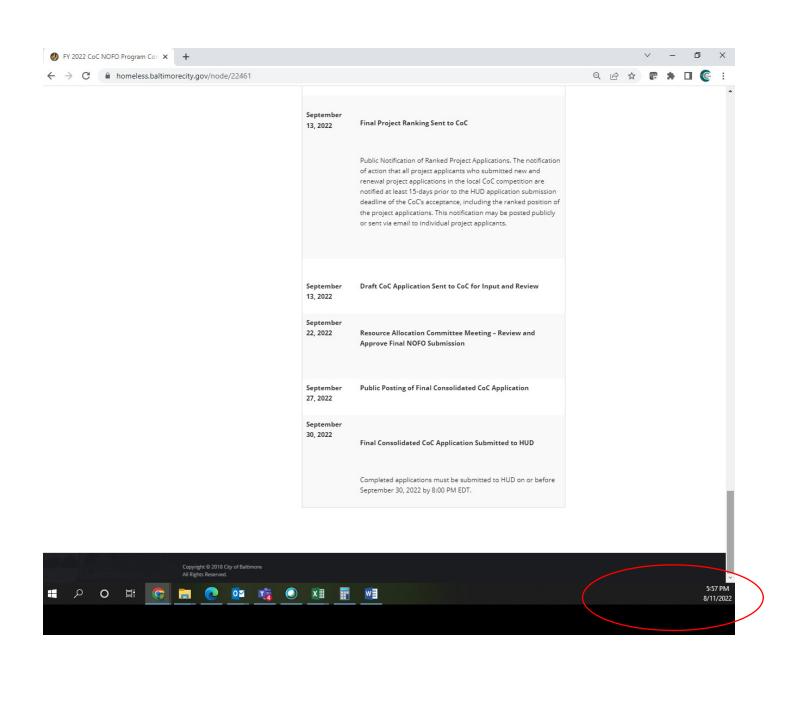


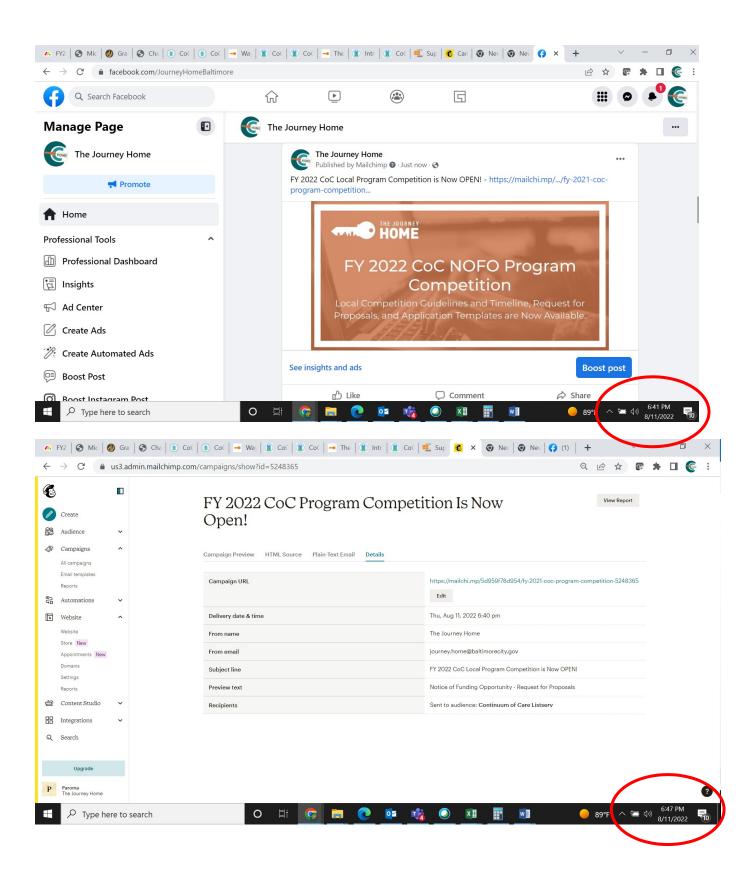












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FY 2022 CoC Program Competition Notice of Funding Opportunity Request for Proposals Submission deadline for Renewal Projects: August 19, 2022 at 5pm

Submission deadline for New/Expansion/YHDP Projects: August 26, 2022 at 5pm

Dear Continuum of Care Members and Community Partners,

The FY 2022 Local Continuum of Care Competition (https://homeless.baltimorecity.gov/node/22461) is now open!

On behalf of the Baltimore City Continuum of Care, The Mayor's Office of Homeless Services (MOHS) is pleased to announce the local FY 2022 CoC competition. All of the local competition materials including project application templates are now posted on the MOHS website. (https://homeless.baltimorecity.gov/node/22461) Please note the project competition timeline has been condensed per HUD's Notice of Funding Opportunity.

Local Deadlines have been established to ensure complete submission of Baltimore City's CoC Application can be completed on or before September 30, 2022.

- 1. Renewal Projects are due Friday, August 19, 2022 at 5pm
- 2. New/Expansion/YHDP Projects are due Friday, August 26, 2022 at 5pm

All project applications and supporting documents must be submitted electronically to HSPApplications@baltimorecity.gov (mailto:mohs.hsp.application@baltimorecity.gov).

MOHS will hold a Bidder's Conference for all project applicants and interested community members on Monday, August 15th at 3pm. No registration is required. You can connect to the webinar via zoom.

* Bidder's Conference (via Zoom)
(https://us06web.zoom.us/j/84970208661?
pwd=WUxHNUFPVU1sTFFPZEIxcFMxbDBsUT09) - August
15, 2022 at 3pm

+ Passcode: 346103

The webinar will review the NOFO requirements, how applications will be scored and ranked, and will review project application templates. Participants will have the ability to submit questions and have them answered in a published FAQ. The webinar will be recorded and posted to the MOHS website for those that cannot attend live.

If you need any assistance with your application, you can reach out to HSPApplications@baltimorecity.gov (mailto:mohs.hsp.application@baltimorecity.gov).

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or ** unsubscribe from this list (*|UNSUB|*)
This email was sent to *|EMAIL|*
(mailto:*|EMAIL|*)
why did I get this? (*|ABOUT_LIST|*)
unsubscribe from this list (*|UNSUB|*)
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subscription preferences (*|UPDATE_PROFILE|*)
*|LIST ADDRESSLINE TEXT|*
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APPENDIX A

Project Title:

Name of Organization:

FY 2022 Continuum of Care Competition (CoC) Threshold Review Tool New Applications

Address of Proposed Project:			
City / Zip code:			
Amount Requested:			
Please check if the following have been submitted:			
Application Components:			
	YES	NO	NOTE
One (1) signed completed application with all supporting documents with signed cover sheet			
Completed Budget Workbook			
Supporting Documents Check List:			
Match Letter(s) with full 25 percent match contribution			
Conflict of Interest Questionnaire and Limits to Primary Religious Organizations – signed and dated			
MOHS Fair Housing Policy and Statement of Agreement – signed and dated			
Housing First Certification – signed and dated			
Articles of Incorporation and Bylaws			
Federal Tax Exemption Determination Letters			
Certificate of Good Standing from State of Maryland between within 30 days of application submission			
Current list of Board of Directors			

Copies of Project's Termination, Non-Discrimination, and		
Grievance Policies Provided to Clients		
Copy of Project's Program Policies/Rules to include client		
Participation Agreement/Rights and Responsibilities		
Project Organizational Chart (must include name, title, email,		
and phone for each staff position at project – this is a		
requirement for the grantors)		
Proof of Ownership or Lease Agreement (if housing will be		
provided at site-based location)		
Charles And the annual and Charles and And the Court of the second		
Single Audit or Independent Financial Audits for the most		
recent 2 years.		
Also, project recipients who expend \$750,000 or more in 1		
year in federal awards must have a single or program-specific		
audit for that year in accordance with the provisions of 2 CFR		
part 200, subpart F.		
pare 200, 340pare 11.		
CoC Threshold: (first 5 are required)		
	1	
Coordinated Entry Participation (if not participating,		
Coordinated Entry Participation (if not participating, commitment to participate)		
Coordinated Entry Participation (if not participating,		
Coordinated Entry Participation (if not participating, commitment to participate)		
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Coordinated Entry Participation (if not participating, commitment to participate) Commitment to Housing First Documented secured minimum match Project has reasonable costs per permanent housing exit, as defined locally Project is financially feasible Applicant is active CoC participant (or commitment to participate) Application is complete and data are consistent		

APPENDIX B

Project Title:

Name of Organization:

Address of Proposed Project:

FY 2022 Continuum of Care Competition (CoC) Threshold Review Tool Renewal Applications

City / Zip code:			
Amount Requested:			
Please check if the following have been submitted:			
Application Components:			
	YES	NO	NOTE
One (1) signed completed application with all supporting documents with signed cover sheet			
Completed Budget Workbook			
Supporting Documents Check List:			
Match Letter(s) with full 25 percent match contribution			
Conflict of Interest Questionnaire and Limits to Primary			
Religious Organizations – signed and dated			
MOHS Fair Housing Policy and Statement of Agreement – signed and dated			
Housing First Certification – signed and dated			
Certificate of Good Standing from State of Maryland between			
within 30 days of application submission			
Current list of Board of Directors			
Copies of Project's Termination, Non-Discrimination, and			
Grievance Policies Provided to Clients			

Copy of Project's Program Policies/Rules to include client Participation Agreement/Rights and Responsibilities		
Project Organizational Chart (must include name, title, email, and phone for each staff position at project – this is a requirement for the grantors)		
Proof of Ownership or Lease Agreement (if housing will be provided at site-based location)		
Single Audit or Independent Financial Audits for the most recent 2 years.		
Also, project recipients who expend \$750,000 or more in 1 year in federal awards must have a single or program-specific audit for that year in accordance with the provisions of 2 CFR part 200, subpart F.		
CoC Threshold: (first 5 are required)		
Coordinated Entry Participation (if not participating, commitment to participate)		
Commitment to Housing First		
Documented secured minimum match		
Project has reasonable costs per permanent housing exit, as defined locally		
Project is financially feasible		
Applicant is active CoC participant (or commitment to participate)		
Application is complete and data are consistent		
Data quality at or above 90%		
Bed/unit utilization rate at or above 90%		
Acceptable organizational audit/financial review		
Documented organizational financial stability		

APPENDIX C

FY2022 CoC Renewal Project -Sco	ring Tool					
Outcome	Factor Goal	Max				
Length of stay						
Rapid Rehousing – On average, participants spend 30 days or less from project entry to residential move-in	30 days	20 points				
Permanent Supportive Housing – On average, participants spend 30 days or less from project entry to residential move-in	30 days	20 points				
Transitional Housing – On average, participants stay in project for less than 180 days.	180 days	20 points				
Exits to Permanent Housing	Exits to Permanent Housing					
Rapid Rehousing – 75% move to permanent housing	75%	25 points				
Permanent Supportive Housing – 90% remain in or move to permanent housing	90%	25 points				
Transitional Housing – 75% move to permanent housing	75%	25 points				
Returns to Homelessness						
Rapid Rehousing – 15% of participants return to homelessness within 12 months of exit to permanent housing	15%	15 points				
Permanent Supportive Housing – 10% of participants return to homelessness within 12 months of exit to permanent	10%	15 points				
Transitional Housing – 15% of participants return to homelessness within 12 months of exit to permanent housing	15%	15 points				

Rapid Rehousing – 50% new or increased earned income for		
project stayers	50%	5 points
Permanent Supportive Housing – 20% new or increased earned	20%	5 points
income for project stayers		F F F F F F F F F F
Transitional Housing – 50% new or increased earned income for	50%	5 points
project stayers		
Rapid Rehousing – 20% new or increased non-employment	20%	5 points
income for project stayers		F F F F F F F F F F
Permanent Supportive Housing – 20% new or increased non-	20%	5 points
employment income for project stayers	2070	3 points
Transitional Housing – 20% new or increased non-employment	20%	5 points
income for project stayers	2070	3 points
Rapid Rehousing – 50% new or increased earned income for	50%	5 points
project leavers	30%	3 points
Permanent Supportive Housing – 20% new or increased earned	20%	E naints
income for project leavers	20%	5 points
Transitional Housing – 50% new or increased earned income for	50%	5 points
project leavers	30%	3 points
Rapid Rehousing – 20% new or increased non-employment	20%	5 points
income for project leavers	2070	3 points
Permanent Supportive Housing – 20% new or increased non-	20%	5 points
employment income for project leavers	2070	5 points
Transitional Housing – 20% new or increased non-employment	20%	5 points
income for project leavers	20/0	5 points
High Need Population: Project focuses on chronically homeless people		
Rapid Rehousing – 50% of participants are chronically homeless	50%	20 points

Permanent Supportive Housing – 75% of participants are chronically homeless	75%	20 points
Transitional Housing – 50% of participants are chronically homeless	50%	20 points
Project Effectiveness		
Rapid Rehousing — Project has reasonable costs per permanent housing exit as defined locally	Yes/No	20 points
Permanent Supportive Housing — Project has reasonable costs per permanent housing exit as defined locally	Yes/No	20 points
Transitional Housing — Project has reasonable costs per permanent housing exit as defined locally	Yes/No	20 points
Rapid Rehousing — Coordinated Entry Participation- 100% of entries to project from CE referral (or alternative system for DV projects)	100%	10 points
Permanent Supportive Housing – Coordinated Entry Participation- 100% of entries to project from CE referral (or alternative system for DV projects)	100%	10 points
Transitional Housing – Coordinated Entry Participation- 100% of entries to project from CE referral (or alternative system for DV projects)	100%	10 points
Rapid Rehousing – Housing First and/or Low Barrier Implementation - CoC assessment of fidelity to Housing First from CoC monitoring or review of project policies and procedures	Yes/No	20 points
Permanent Supportive Housing – Housing First and/or Low Barrier Implementation - CoC assessment of fidelity to Housing First from CoC monitoring or review of project policies and procedures	Yes/No	20 points
Transitional Housing – Housing First and/or Low Barrier Implementation - CoC assessment of fidelity to Housing First from CoC monitoring or review of project policies and procedures	Yes/No	20 points

CoC Local Criteria		
CoC Monitoring Score : Project is operating in conformance with CoC Standards	Yes/No	10 points
Point-in-Time Count: Project/Agency is an active participant in the annual Point-in-Time/ Housing-Inventory Count	Yes/No	10 points
FY 2022 HUD Policy Priorities: Project/Agency's alignment with policy priorities (Section II. A)	Evaluation of Response	Up to 10 points
FY 2022 HUD Policy Priorities: Emphasis on Racial Equity and Steps Taken to Eliminate Barriers to Improve Racial Equity (Section II. A. 6)	Evaluation of Response	Up to 10 points
FY 2022 HUD Policy Priorities: Addressing the needs of Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ+) individuals (Section II. A. 7).	Evaluation of Response	Up to 10 points
Total Points Possible		
Rapid Rehousing Transitional Housing	Total	200 points
Permanent Supportive Housing		

The Resource Allocation Committee will review SSO Projects and Safe Haven Project separately based on local CoC and HUD priorities. Projects will be scored to maximize the overall CoC application score.

The Resources Allocation Committee may adjust individual projects up or down in the ranking or reallocate in order to fulfill HUD priorities, prevent potential losses of funding, and maximize the overall CoC application score.

All scores will be weighted to a 100-point scale for ranking.

APPENDIX D

ome	Max points
ience	
Describe the experience of the applicant and sub-recipients (if any) in working with the proposed population and in providing housing similar to that proposed in the application.	15 points
Describe experience with utilizing a Housing First approach. Include the following:	
1) eligibility criteria;	
2) process for accepting new clients;	
3) process and criteria for exiting clients.	
Must demonstrate there are no preconditions to entry, allowing entry regardless of current or past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, actual or perceived sexual orientation, gender identity. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.	f 10 points
Describe experience in effectively utilizing federal funds including HUD grants and other public funding, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of subrecipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of required reporting on existing grants.	5 points

Extent to which the applicant:	
1) Demonstrates understanding of the needs of the clients to be served.	
2) Demonstrates that type, scale, and location of the housing fit the needs of the clients to be served.	
3) Demonstrates that type and scale of the all supportive services, regardless of funding source, meets the needs of clients to be served.	
4) Demonstrates how clients will be assisted in obtaining mainstream benefits.	20 points
5) Establishes performances measures for housing and income that are objective, measurable, trackable and meet or exceed any established HUD or CoC benchmarks.	
Must align with FY 2022 HUD Policy Priorities (Section II.A)	
Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs.	10 points
Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently.	10 points
Timeliness	
Describe plan for rapid implementation of the program, documenting how the project will be ready to begin housing the first program participant. Provide a detailed schedule of proposed activities for 60 days, 120 days, and 180 days after grant award.	10 points
Financials	

Project is cost-effective when projected cost per person served is compared to CoC average within project type.	5 points
Organization's most recent audit (5 points for each):	
 Found no exceptions to standard practices Identified agency as 'low risk' Indicates no findings 	15 points
Documented match funding amount meets HUD requirements.	10 points
Budgeted costs are reasonable, allocable, and allowable.	20 points
Project Effectiveness	
Coordinated Entry Participation- at least 95% of entries projected to come from CE referrals	5 points
Total Points Possible	135 points

All scores will be weighted to a 100-point scale for ranking.

Sample Score: Scored Forms for One Renewal Project

APPENDIX B

FY 2022 Continuum of Care Competition (CoC) Threshold Review Tool Renewal Applications

Name of Organization: Health Care for the Homeless

Project Title: Health Care for the Homeless - Homewood Bound Bonus MD0330L3B012106

Address of Proposed Project: 421 Fallsway

City / Zip code: Baltimore 21202

Amount Requested: \$940,523.00

Please check if the following have been submitted:

Application Components:		
YES	NO	NOTE
YES		
YES		
YES		
YES		
YES		
YES		
YES		
YES		
YES		
	YES YES YES YES YES	YES YES YES YES YES YES YES YES

Copy of Project's Program Policies/Rules to include client Participation Agreement/Rights and Responsibilities	YES
Project Organizational Chart (must include name, title, email, and phone for each staff position at project – this is a requirement for the grantors)	YES
Proof of Ownership or Lease Agreement (if housing will be provided at site-based location)	N/A
Single Audit or Independent Financial Audits for the most recent 2 years.	YES
Also, project recipients who expend \$750,000 or more in 1 year in federal awards must have a single or program-specific audit for that year in accordance with the provisions of 2 CFR part 200, subpart F.	
CoC Threshold: (first 5 are required)	
Coordinated Entry Participation (if not participating, commitment to participate)	YES
Commitment to Housing First	YES
Documented secured minimum match	YES
Project has reasonable costs per permanent housing exit, as defined locally	YES
Project is financially feasible	YES
Applicant is active CoC participant (or commitment to participate)	YES
Application is complete and data are consistent	YES
Data quality at or above 90%	YES
Bed/unit utilization rate at or above 90%	YES
Acceptable organizational audit/financial review	YES
Documented organizational financial stability	YES

APPENDIX C

Outcome	Factor Goal	Max	Project Score
Length of stay			
Permanent Supportive Housing – On average, participants spend 30 days or less from project entry to residential move-in	30 days	20 points	10
Exits to Permanent Housing			
Permanent Supportive Housing – 90% remain in or move to permanent housing	90%	25 points	25
Returns to Homelessness			
Permanent Supportive Housing – 10% of participants return to homelessness within 12 months of exit to permanent	10%	15 points	0
New or Increased Income and Earned Income			
Permanent Supportive Housing – 20% new or increased earned income for project stayers	20%	5 points	5
Permanent Supportive Housing – 20% new or increased non-employment income for project stayers	20%	5 points	0
Permanent Supportive Housing – 20% new or increased earned income for project leavers	20%	5 points	5
Permanent Supportive Housing – 20% new or increased non-employment income for project leavers	20%	5 points	5

Permanent Supportive Housing – 75% of participants are chronically homeless	75%	20 points	15
Project Effectiveness			
Permanent Supportive Housing — Project has			5
reasonable costs per permanent housing exit as defined locally	Yes/No	20 points	
Permanent Supportive Housing – Coordinated Entry Participation- 100% of entries to project from CE referral (or alternative system for DV projects)	100%	10 points	10
Permanent Supportive Housing – Housing First and/or Low Barrier Implementation - CoC assessment of fidelity to Housing First from CoC monitoring or review of project policies and procedures	Yes/No	20 points	20
CoC Local Criteria			
CoC Monitoring Score: Project is operating in			5
conformance with CoC Standards	Yes/No	10 points	
Point-in-Time Count: Project/Agency is an active participant in the annual Point-in-Time/Housing-Inventory Count	Yes/No	10 points	10
FY 2022 HUD Policy Priorities: Project/Agency's alignment with policy priorities (Section II. A)	Evaluation of Response	Up to 10 points	10
FY 2022 HUD Policy Priorities: Emphasis on Racial Equity and Steps Taken to Eliminate Barriers to Improve Racial Equity (Section II. A. 6)	Evaluation of Response	Up to 10 points	10
FY 2022 HUD Policy Priorities: Addressing the needs of Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ+) individuals (Section II. A. 7).	Evaluation of Response	Up to 10 points	10

Sample Score: Scored Forms for One Renewal Project

Total Points Possible				
Permanent Supportive Housing Tie Breaker		Total	200 points	145/200 =72.5%
 Highest % of clients exiting to or retaining permanent housing 	97%			
Highest utilization rate	100%	6		

FY 2022 CoC Competition MD-501

Attachments for the FY 2022 CoC Application Projects Rejected/Reduced- Notification Outside of e-snaps.

Notify, in writing outside of e-snaps, project applicants who submitted their project applications to the CoC by the CoC-established deadline, whether their project application(s) will be accepted and ranked, rejected, or reduced on the CoC Priority Listing no later than 15 days before the FY 2022 CoC Program Competition application submission deadline, and where a project application is being rejected or reduced, the CoC must indicate the reason(s) for the rejection or reduction;

Attachments Include the Following:

- 1. Email notification to Sarah Wallace at For My Kidz, Inc dated September 11, 2022 regarding new project application.
 - a. Attachment: FMK FY22 CoC Notification Letter signed.pdf
 - i. New project rejection letter
- 2. Email notification to Nico Sanders at CHA dated September 11, 2022 regarding new project application.
 - a. Attachment: CHA FY22 CoC Notification Letter signed.pdf
 - i. New project rejection letter
- 3. Letter to AIRS: dated May 25, 2022 from MOHS and dated
 - a. May 24, 2022 from HUD Please note that AIRS did not submit a renewal project for direct grants
 - b. May 25, 2022 from MOHS Please note that AIRS did not submit a renewal project for MD0016
- 4. FY 22 CoC Public Notification of Ranked Project Applications Noting which projects were reallocated

Nandi, Paroma (MOHS)

From: Nandi, Paroma (MOHS)

Sent: Monday, September 12, 2022 6:19 PM

To: Sarah Wallace

Cc: 'CharlesCallahan@umm.edu'; Agustin, Irene (MOHS)

Subject:FY 2022 CoC Competition NotificationAttachments:FMK_FY22 CoC Notification Letter.pdf

Importance: High

Hi Sarah,

On behalf of the CoC, please see the attached notification letter regarding the new project application submitted in the FY 2022 CoC Competition. Please note that proposal did not meet the full requirements of the CoC application. We look forward to continuing our partnership with For My Kidz, and we will be happy to connect with you to debrief about your project proposal.

We want to thank you for the work that you do, and your dedication to ending homelessness in Baltimore City.

Kind regards, Paroma



Paroma Nandi, MPA

(pronouns: she/her/hers)

Chief of Policy & Partnership

Mayor's Office of Homeless Services
7 E. Redwood St. 5th Fl. Baltimore, MD 21202

443-853-0079

paroma.nandi@baltimorecity.gov



September 12, 2022

Sarah Wallace For My Kidz, Inc. 2036 W. North Ave Baltimore, MD 21217

Re: FY 2022 Continuum of Care Competition

Dear Ms. Wallace,

Thank you for submitting a project proposal for Baltimore City's Annual Continuum of Care Competition. Unfortunately, after conducting a threshold review, it was determined that the project did not comply with the CoC application requirements. This letter is to formally provide you with written notice that the project proposal was not accepted in the FY 2022 CoC Competition.

We appreciate the effort that your organization put into preparing this application. As a new applicant we encourage you to consider applying again in the future, and we would like to find different opportunities to collaborate with your organization.

Thank you for your commitment to making homelessness rare and brief in Baltimore City. We wish you much success in your future endeavors.

2022-Sep-12 10:12

Chuck Callahan, CoC Committee Chair

Resource Allocation Committee

2022-Sep-12 14:14

Irene Agustin,

Director

Mayor's Office of Homeless Services

Nandi, Paroma (MOHS)

From: Nandi, Paroma (MOHS)

Sent: Monday, September 12, 2022 6:22 PM

To: Nico Sanders

Cc: 'CharlesCallahan@umm.edu'; Agustin, Irene (MOHS); jmurray@chaincmd.org;

Jpopp@chaincmd.org

Subject: FY 2022 CoC New Project Notification

Attachments: CHA_FY22 CoC Notification Letter (New Project).pdf

Importance: High

Hi Nico

On behalf of the CoC, please see the attached notification letter regarding the new project application submitted in the FY 2022 CoC Competition. Please note that proposal was not accepted after a review from the Resource Allocation Committee.

We look forward to continuing our partnership with Community Housing Associates, and we will be happy to connect with you to debrief about your project proposal.

We want to thank you for the work that you do, and your dedication to ending homelessness in Baltimore City.

Kind regards, Paroma



Paroma Nandi, MPA

(pronouns: she/her/hers)

Chief of Policy & Partnership

Mayor's Office of Homeless Services
7 E. Redwood St. 5th Fl. Baltimore, MD 21202

443-853-0079

paroma.nandi@baltimorecity.gov



September 12, 2022

Nico Sanders Community Housing Associates 2918 Glenmore Ave, Ste. B Baltimore, MD 21214

Re: FY 2022 Continuum of Care Competition

Dear Mr. Sanders,

Thank you for submitting a new project proposal for Baltimore City's Annual Continuum of Care Competition. This letter is to formally provide you with written notice that the new project proposal was not accepted in the FY 2022 CoC Competition. The project was reviewed by the Resource Allocation Committee, but was determined that the proposal did not reflect the full priorities of the CoC, and ultimately exceeded the amount available for new project activities.

We appreciate the effort that your organization put into preparing this application, and encourage you to consider applying again in the future.

Thank you for your commitment to making homelessness rare and brief in Baltimore City. We wish you much success in your future endeavors.

Sincerely

2022-Sep-12 10:10

Chuck Callahan, CoC Committee Chair Resource Allocation Committee 2022-Sep-12 14:13

Irene Agustin,
Director
Mayor's Office of Homeless Services

CC: Joan Murray, Operations Director CHA John Popp Finance Director, CHA

CITY OF BALTIMORE

Brandon M. Scott, Mayor



Office of the Director of MOHS

Irene Agustin, Executive Director 7 E. Redwood Street, 5th Floor Baltimore, MD 21202

May 25, 2022

AIDS Interfaith Residential Services (AIRS) 1800 N. Charles Street Suite 700 Baltimore, MD 21201

SUBJECT: Mayor's Office of Homeless Services – Contractual Termination and Rescission of Conditional Award

AIDS Interfaith Residential Services (AIRS)

CoC (Continuum of Care) Shelter Plus Care (S+C) Project MD0016L3B012013	HOPWA (Housing Opportunities for Persons with AIDS) At the Door (ATD) Project
Contract #: 40052	Contract #: 40252
Grant Period: 4/1/2021 – 3/31/2022	Grant Period: 5/1/2021 - 4/30/2024
Grant Amount: \$ 1,549,113.00	Grant Amount: \$1,291,102.00

The Mayor's Office of Homeless Services (MOHS) is a recipient of various federal and state sources and as a sub-recipient of these funds, MOHS is required to monitor the AIDS Interfaith Residential Services' (AIRS) programs to ensure that your organization is in compliance with the federal regulations and contractual obligations under which the above referenced grants were made.

The purpose of this letter is to inform you that AIRS has repeatedly failed to fulfill in a timely and proper manner its obligations under Contract #40252 and has violated the representations, warranties, covenants, terms or stipulations of Contract #40252. Accordingly, MOHS hereby gives notice of its intention to terminate Contract #40252 for cause pursuant to section 10. Termination, 10.1., Termination for Cause:

10.1. Termination for Cause: If the Provider shall fail to fulfill in a timely and proper manner its obligations under this Agreement, or if the Provider shall violate any of the representations, warranties, covenants, terms or stipulations of this Agreement, the City shall thereupon have the right to terminate this Agreement, provided the Provider has failed to cure such violation within ten (10) days after receiving written notification from the City. The Provider will receive compensation for actual services performed and actual expenses incurred for any approved invoices related to work completed prior to such termination pursuant to the terms of this Agreement. Notwithstanding the above, the Provider shall not be relieved of liability to City for damages sustained by the City by any breach of this Agreement.

This notice of Termination for Cause is hereby given to AIRS due to the deficiencies noted from MOHS's March 9, 2022 monitoring and the unsatisfactory resolution of the deficiencies and corrective actions in the April 27, 2022 monitoring notification from Donata Patrick, MOHS Program Compliance Supervisor.

Specifically, the corrective actions sought in the monitoring letter were not completed by AIRS within the cure period, which expired on May 12, 2022.

Further, MOHS is rescinding the notice of conditional award for the Continuum of Care (CoC) renewal grant (see notification from Paroma Nandi, dated April 7th, 2022). The rescission of this conditional renewal award is due to the deficiencies noted in MOHS's March 9, 2022 CoC grant #40052 monitoring, as detailed in the monitoring notification letter from Donata Patrick, Program Compliance Supervisor, dated April 27, 2022. The Monitoring notification letter specified a cure period, which ended on May 12, 2022 without any response from AIRS as requested. To date, no response has been received, indicating that the corrective actions specified had been completed.

The City reserves all rights, remedies and defenses available to it under contract, at law and in equity.

Signed,

William R. Wells
Deputy Director
Mayor's Office of Ho

Mayor's Office of Homeless Services

7th Redwood St, Floor 5 Baltimore, MD 21202

CC:

Irene Agustin, Mayor's Office of Homeless Services Executive Director
Donata Patrick, Mayor's Office of Homeless Services Program Compliance Supervisor
D'Andra Pollard, Mayor's Office of Homeless Services HOPWA Supervisor
Cristian Suarez, Mayor's Office of Homeless Services Program Compliance Officer
Rasheda O'Neal, Mayor's Office of Homeless Services Program Compliance Officer
Michael Mullen, Baltimore City Department of Law, Chief Solicitor, Contracts
Michelle White, U.S. Department of Housing and Urban Development CPD Representative
Anthony Butler, AIRS Executive Director
Channa Williams, AIRS Board Chair



U.S. Department of Housing and Urban Development

Baltimore Field Office Bank of America Building, Tower II 100 S. Charles Street, Suite 500 Baltimore, MD 21201

May 24, 2022

Mr. Anthony I. Butler President & CEO AIDS Interfaith Residential Services, Inc. 1800 North Charles St., Suite 700 Baltimore, MD 21201

Dear Mr. Butler:

SUBJECT:

Continuum of Care (CoC) Program and Housing Assistance for Persons with AIDS

HOPWA) Competitive Program

AIDS Interfaith Residential Services (AIRS), Inc.

HUD Reply to Fiscal Year 2021 Remote Monitoring Report Response, and

HUD Reply to AIRS Areas of Noncompliance, and

IIUD Reply to AIRS Areas of Noncompliance with Remedial Actions

IIUD Reply to Fiscal Year 2021 Remote Monitoring Report Response

From July 27 to August 6, 2021, this Office conducted a remote monitoring of AIRS' administration of its Housing Opportunities for Persons With AIDS – Competitive (HOPWA-C) Program award in order to assess your organization's performance and compliance with applicable Federal requirements. Program performance was assessed through a review of operations, file documentation and interviews. HUD's review of these areas of program performance resulted in the identification of both Findings and Concerns.

The original report contained two (2) Findings and four (4) Concerns. Within 30 days from the date of the letter dated September 21, 2021, AIRS was required to provide additional information demonstrating that you have met the requirements of each Finding. Thirty-days from date of issuance was October 21, 2021, and AIRS failed to respond within that timeframe to meet the deadline. Furthermore, Mr. Anthony Butler transmitted AIRS' written response to HUD's monitoring report (dated March 18, 2022) on May 5, 2022. AIRS agreed with each of HUD's Findings.

AIRS' written response did not provide any documentation required to address the outstanding items to allow HUD to successfully close any of the Findings. AIRS responses to the Findings were reviewed, and below are HUD's conclusions.

Finding #1: FFATA & SAM Compliance - OPEN

Finding #1 Overview: HUD found that there is no system in place for complying with all requirements of the Federal award, including the Federal Funding Accountability and Transparency Act of 2006 (FFATA) and System for Award Management (SAM) requirements provided under 2 CFR parts 25 and 170. AIRS' Fiscal Policies and Procedures stated that it complies with FFATA and SAM regulations, it does not describe the process or system to achieve this compliance. Without a proper system in place to comply with FFATA, grantees may award funds to non-compliant sponsors/subrecipients.

The corrective actions requested were to review the specific regulations and revise Fiscal Policies and Procedures to include protocols to ensure compliance with the specific requirements pertaining to 2 CFR Parts 25 and 170, and to provide HUD with a copy of the policies and procedures. To satisfy the finding, AIRS was required to submit a written response showing that the revised policy was created and in place.

AIRS response, March 18, 2022: "Although AIRS references the FFATA and the relevant CFR in our fiscal policies we acknowledge that those sections were not detailed policies and procedures. As a result, the attached revised policy was adopted to ensure compliance with FFATA and SAM."

HUD Reply: The process has been outlined, but the DUNS is no longer applicable; it must be the UEI now. This is incomplete and the finding is still open.

Action: Please provide your written response within 30 days of the date of this letter.

Finding #2: Use of Funds for Eligible HOPWA Activities - OPEN

HUD found that AIRS does not have a system to ensure that all personnel time charged against a grant was categorized correctly under HOPWA eligible activities. AIRS is using an automated payroll system that does not break down the types of personnel activities charges to this grant, or any other grant funded at AIRS, and therefore there is no way for HUD staff to determine whether personnel time being charged to specific grants fall under the proper eligible activities.

The corrective actions were two-fold: to implement a payroll activity log that includes specific work codes that correspond to grant-eligible activities, which is stipulated in the grant agreement, and to provide a copy of the payroll activity log to HUD. These were required to be provided within 30 days of submission of the Monitoring report and letter.

AIRS response, March 18, 2022: "In the previous fiscal year, and as part of a technology upgrade, AIRS upgraded its payroll system and abandoned the use of paper timesheets. In doing so, the level of detail required to demonstrate the proper allocation of personnel time was lost and an unintended consequence of the upgrade. To resolve this issue, we now require staff to submit a weekly Time & Effort log in addition to entering their time in the payroll system. This log allows

finance staff to ensure that the 1) time is accurately entered in the payroll system and 2) that the proper activities are billed with sufficient documentation. A sample of the Time & Effort log is attached."

HUD Reply: The timesheet log provided as an attachment to the written response submitted to HUD did not include a legend for specific work codes. This is necessary to ensure payroll activities for AIRS employees are logged appropriately by grant and eligible activity, in order to be accurately charged to and traced by specific grant funds. This is incomplete and the finding is still open.

Action: Please provide your written response within 30 days of the date of this letter.

HUD Reply to AIRS Areas of Noncompliance

Financial Management: eLOCCS

HUD's Technical Assistance Center received a complaint from a former employee of your organization, that their secure log-in and password were used by your organization to make unauthorized draws in eLOCCS. The former staff followed Security Protocol HUD/the Office of the Chief Financial Officer (OCFO) Terms and Conditions and Rules of Behavior in alerting OCFO staff of their departure from your organization when they departed employment. After the date and time your former employee notified HUD's OCFO of their departure, the WASS ID showed activity of logging in with multiple password resets 37 times from March 11, 2022 through April 29, 2022. This was initiated by an unidentified staff member who was not the intended user.

Upon sign-in to the eLOCCS system, the user must acknowledge with "Accept" or "Reject" a Legal Notice from U.S. Department of Housing and Urban Development and HUD/OCFO Terms and Conditions. Because of the evidence of unauthorized use, and use of the system implies understanding of the terms and conditions of these Legal and Security Notices, HUD was obligated to terminate all access to eLOCCS for all users of AIRS.

During the 37 sign-in to eLOCCS by an unauthorized user, 41 separate vouchers were drawn and completed, totaling \$389,471.49.

Financial Management: Voucher Documentation

Due to the volume of draws and logins made during the timeframe of unauthorized access to eLOCCS, IIUD required AIRS to submit backup documentation of randomly selected vouchers for each open grant. On May 6, 2022 HUD required AIRS submit the following vouchers' supporting documentation be submitted to HUD no later than May 10, 2022.

MD0091L3B012013 (CoC)		100 March 100 Ma			3B012013 oC)	MDH200030 (HOPWA-C)		
Voucher#	S Drawn	Voucher#	\$ Drawn	Voucher #	S Drawn	Voucher#	\$ Drawn	
501- 00699959	594.36	501- 00692726	302.96	501- 00699378	9,765.00	33146623777	27,113.00	
501- 00696781	8,670.27	501- 00692352	3,458.00	501- 00698230	18,652.00	33066613884	28,638.00	

501- 00694155	6,290.00	501- 00691227	7,973.28	501- 00694169	9,103.00	32776602491	19,270.00
501- 00690802	41,784.96	501- 00690794	18,628.70	501- 00690798	40,199.00	32596591665	29,740.00

Grant Number: MD0091L3B012013

On May 10, 2022, AIRS provided a salary spreadshect with overview of expenses during the period of 12/20/2021 - 1/31/2022, timeshects for 12/20/21-1/31/22, 2/1-2/27, 3/14-3/27, 3/28-4/10, 4/11-4/24, and a copy of an invoice and check for ZenLately. AIRS submission did not include evidence that staff were paid, amounts staff were paid, nor backup documentation that ZenLately is a CoC eligible costs.

AIRS was required to provide in separate .pdf submissions (based on each voucher number) the supporting backup documentation totaling the exact amount of the following vouchers: 501-0069959, 501-00696781, 501-00694155, and 501-00690802. AIRS was requested to submit this documentation to HUD no later than May 16, 2022.

AIRS failed to provide any additional backup documentation and did not provide a written or any communication of a response to HUD's request for documentation.

Grant Number: MD0015L3B012013

On May 10, 2022, AIRS provided a monthly CoC program grant expenses breakdown for December 2021, January 2022, February 2022, March 2022, spreadsheet overview including an approved budget, actual expenses, year to date expenses, and the balance remaining each month. AIRS provided summary of staff salary, hours worked and amount charged to grant including fringe, and timesheets for the following: 02/28/2022 - 03/13/2022, 02/01/2022 - 02/27/2022, 01/01/2022 - 01/31/2022, 12/01/2021 - 12/31/2021, 11/22/2021 - 11/30/2021. AIRS did not include evidence staff were paid, amounts staff were paid, nor evidence rental payments were issued to landlords/property management companies with supporting documentation such as cleared checks or bank statements. Additionally, AIRS did not provide complete and separate backup documentation for each voucher totaling the voucher amounts entered into eLOCCS.

AIRS was required to provide in separate .pdf submissions supporting backup documentation totaling the exact amounts listed in each voucher. AIRS was required to submit documentation for staff salaries for pay periods 11/22/2021 through 3/13/2022. AIRS was required to provide evidence housing and housing related payments were issued to landlords/property management companies, and/or utility companies with supporting documentation such as cleared checks or bank statements. AIRS was required to submit this documentation to HUD no later than May 16, 2022.

Grant Number: MD0014L3B012013

On May 10, 2022, AIRS provided a spreadsheet providing overview of expenses for April 2022, payroll, timesheets for 9/01/2021 through 4/19/2022. AIRS did not include evidence staff

were paid nor amounts staff were paid. Additionally, AIRS did not provide complete and separate backup documentation for each voucher that totaled the voucher amounts entered into eLOCCS.

AIRS was required to provide in separate .pdf submissions backup documentation totaling the exact amount of the following vouchers: 501-00699378, 501-00698230, 501-00694169 and 501-00690798. AIRS was required to submit documentation for staff salaries for pay periods 9/01/2021 through 4/19/2022. AIRS was required to submit this documentation to HUD no later than May 16, 2022.

Grant Number: MDH200030 - HOPWA Competitive Program

On May 10, 2022, AIRS provided a spreadsheet providing overview of expenses for April 2022 payroll, timesheets for 9/01/2021-04/19/2022. AIRS did not include evidence staff were paid nor amounts staff were paid. Additionally, AIRS did not provide complete and separate backup documentation for each voucher that totaled the voucher amounts entered into eLOCCS.

AIRS was required to provide in separate .pdf submissions backup documentation totaling the exact amount of the following vouchers: 33146623777, 33066613884, 32776602491, and 32596591665. AIRS was required to submit source documentation for staff salaries for pay periods between 9/01/2021 through 4/19/2022, with evidence housing and housing related payments were issued to landlords/property management companies, and/or utility companies with documentation such as cleared checks or bank statements. AIRS was required to submit this documentation to HUD no later than May 16, 2022.

Financial Management - Voucher - Summary

AIRS response and submissions are insufficient for HUD to verify the vouchers drawn in eLOCCS have backup documentation. Your organization should readily have all backup source documentation organized by each financial draw in eLOCCS and is required to have on file before drawing from eLOCCS system.

As fully described in 2 CFR 200.302(b)(3), and specifically pertaining to HOPWA, 24 CFR 574.605, and CoC, 24 CFR 578.99(e) and 578.103(a)(16), all entities receiving HUD funds must maintain source documentation that supports the information in the financial management system regarding HUD grant awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest. Based on HUD's review of the randomly selected vouchers for three CoC programs and one HOPWA program, AIRS has been unable to produce basic source documentation supporting the financial management system draws in eLOCCS, regarding its HUD grant awards.

Financial Management: Single Audit

The HUD CPD - Baltimore Field Office monitors receipt of audits by the Federal Audit Clearinghouse (FAC) for all HUD Community Planning and Development (CPD) formula and competitive grantees in accordance with 2 CFR § 200.501 Audit requirements. This requires each non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in

Federal awards to have a single or program-specific audit conducted for that year in accordance with the provisions of the standards in the 2 CFR 200.501.

These are due to HUD and the Federal Audit Clearinghouse (FAC) on an annual basis. Specifically, Recipients are required to submit within the earlier of: (1) 30 days after receipt of the audit report or (2) nine months after the end of the audit period, a data collection form and reporting package to the Federal Audit Clearinghouse (FAC). AIRS has failed to produce Fiscal Year (FY) 2019, FY 2020 and FY 2021 Single Audits. The AIRS' FY2019 Audit was due to the FAC by March 31, 2020, but due to the pandemic, recipients were provided with an extension. The AIRS FY 2020 Audit was due to the FAC by March 31, 2021, and the FY 2021 Audit was due March 31, 2022.

HUD communicated with AIRS on March 7, 2022, March 15, 2022, May 4, 2022, May 10, 2022 and May 12, 2022 on the Single Audit status. AIRS gave the following deadlines for when the Single Audits in question will be submitted to the Field Office and the FAC:

- FY19 completed by 7/11/2022
- FY20 completed by 8/15/2022
- FY21 completed by 9/30/2022

AIRS stated the firm Premier Group Services, Inc. was selected to complete the three delinquent Single Audits. In accordance with HOPWA (24 CFR 574.650) and CoC (24 CFR 578.99(e), 24 CFR 578.99(g)), AIRS was asked to provide HUD evidence that AIRS sought an Auditor in accordance with the procurement standards outlined in 2 CFR 200.317 through 200.326.

Specifically, HUD required receipt of the request for proposal for audit services that AIRS publicly issued, and all factors used to evaluate and consider the proposals submitted to provide audit services to AIRS. AIRS was required to provide the organizational financial statements, including the schedule of expenditures of all Federal awards, required by 2 CFR 200.510, that has been provided to your Auditor for them to complete your FY19, FY20 and FY21 Single Audits. These are not only required by federal law but are required for your Auditor to complete the Single Audits for the three outstanding years. AIRS has failed to provide evidence their Auditor was selected in accordance with the program requirements outlined in 2 CFR 200.317 through 200.326 and is significantly delinquent in submitting a Single Audit for three consecutive years.

HUD Reply to AIRS Areas of Noncompliance with Remedial Actions

Sanctions

Due to AIRS' unauthorized access to eLOCCS, AIRS' failure to comply with the Financial Management requirements to have source documentation for expenditures in their grant program, and AIRS failure to respond to opportunity for remedy despite numerous opportunities, it is HUD's determination that AIRS' noncompliance cannot be remedied by imposing additional conditions. HUD is immediately taking remedial action as described in 24 CFR 578.107 for Continuum of Care funding and in §200.339, Remedies for noncompliance for financial management of all HUD funding.

24 CFR 578.107, Sanctions

- 3) If the recipient fails to demonstrate to HUD's satisfaction that the activities were carried out in compliance with program requirements, HUD may take one or more of the remedial actions or sanctions specified in paragraph (b) of this section.
 - (b) Remedial actions and sanctions. Remedial actions and sanctions for a failure to meet a program requirement will be designed to prevent a continuation of the deficiency; to mitigate, to the extent possible, its adverse effects or consequences; and to prevent its recurrence.
 - (3) HUD may suspend payments to the extent HUD determines necessary to preclude the further expenditure of funds for affected activities or projects...
 - (4) HUD may continue the grant with a substitute recipient of HUD's choosing...
 - (6) IIUD may require the recipient to reimburse the recipient's line of credit in an amount equal to the funds used for the affected activities...
 - (7) HUD may reduce or terminate the remaining grant of a recipient.

2 CFR 200.339, Remedies for noncompliance

If a non-Federal entity fails to comply with the U.S. Constitution, Federal statutes, regulations or the terms and conditions of a Federal award, the Federal awarding agency or pass-through entity may impose additional conditions, as described in § 200.208. If the Federal awarding agency or pass-through entity determines that noncompliance cannot be remedied by imposing additional conditions, the Federal awarding agency or pass-through entity may take one or more of the following actions, as appropriate in the circumstances:

- (a) Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
- (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- (c) Wholly or partly suspend or terminate the Federal award.
- (d) Initiate suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- (e) Withhold further Federal awards for the project or program.
- (f) Take other remedies that may be legally available.

Remedial Actions

HUD is electing to wholly terminate all Federal awards contracted with AIRS and the U.S. Department of Housing and Urban Development and will be continuing each grant with a substitute recipient of HUD's choosing. This applies to the following grants, and all grants that preceded the existing renewal status of both the CoC and HOPWA-C programs:

Housing Opportunities for People With AIDS (HOPWA-C)

MDH200-030, \$1,284,588.00

Housing Opportunities for People With AIDS (HOPWA), CARES Act-2020

MDH200-1W007, \$149,312

Continuum of Care (CoC), Special Needs Assistance:

- MD0014L3B012013, \$188,563
- MD0015L3B012013, \$162,746
- MD0091L3B012013, \$213,296
- MD0222L3B052012, \$163,501

Effective immediately, HUD is taking possession of all client and grant files related to the implementation and operation of each of the grants listed above. HUD staff will be on site on May 25, 2022 to transfer ownership of the grant files to a separate HUD Recipient of our choosing.

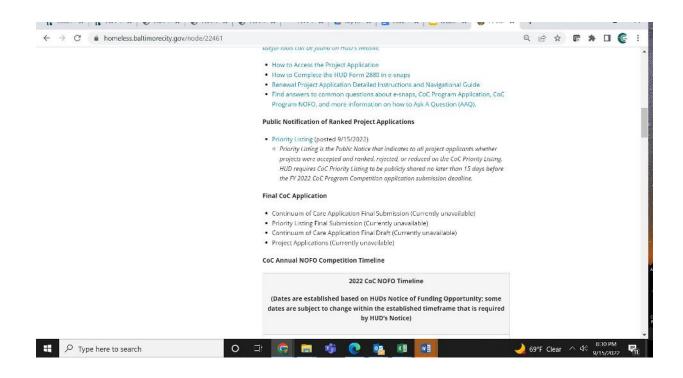
AIRS must provide a response within 30 days of the date of this letter with follow up to the monitoring findings from the FY2021 Report of AIRS HOPWA-C program.

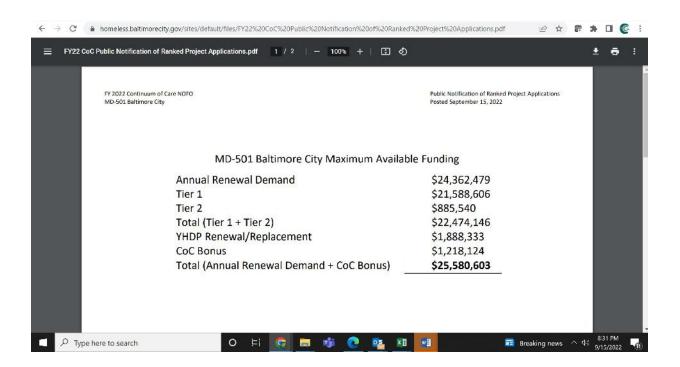
All communication regarding this or any other action by HUD should be sent to the Department of Housing and Urban Development, Baltimore Office, Community Planning and Development Division, Bank of America Bldg., Tower II, 100 S. Charles Street, Suite 500 Baltimore, MD 21201.

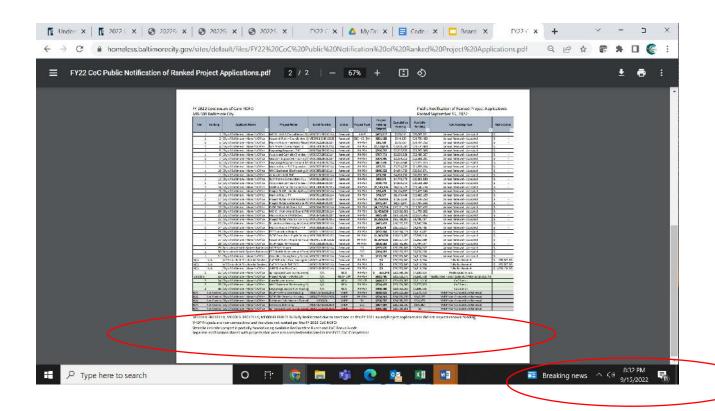
Sincerely,

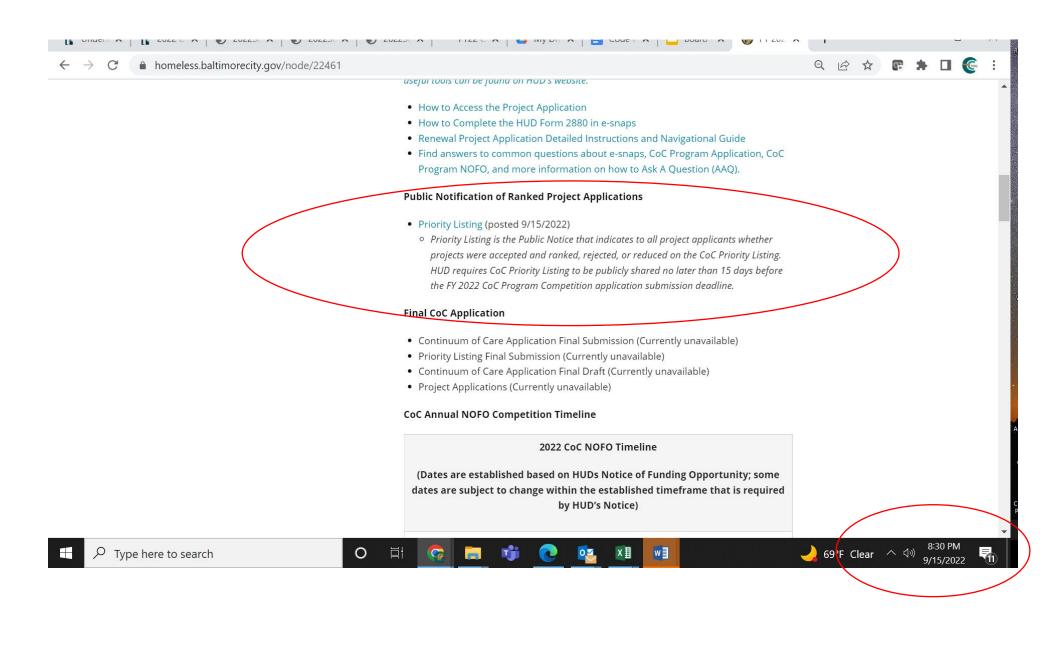
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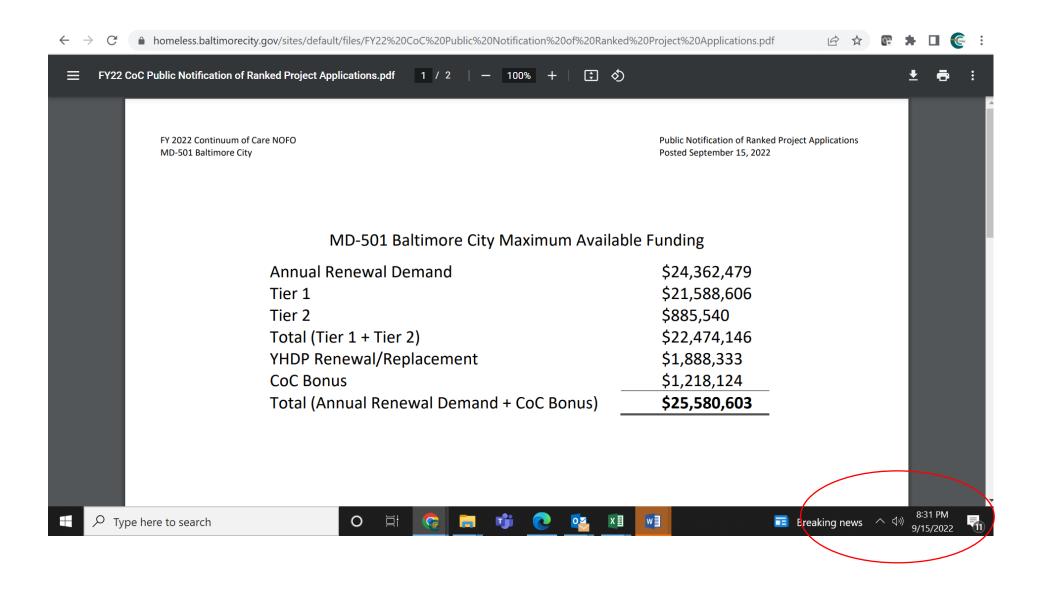
Charles Halm Director Office of Community Planning and Development

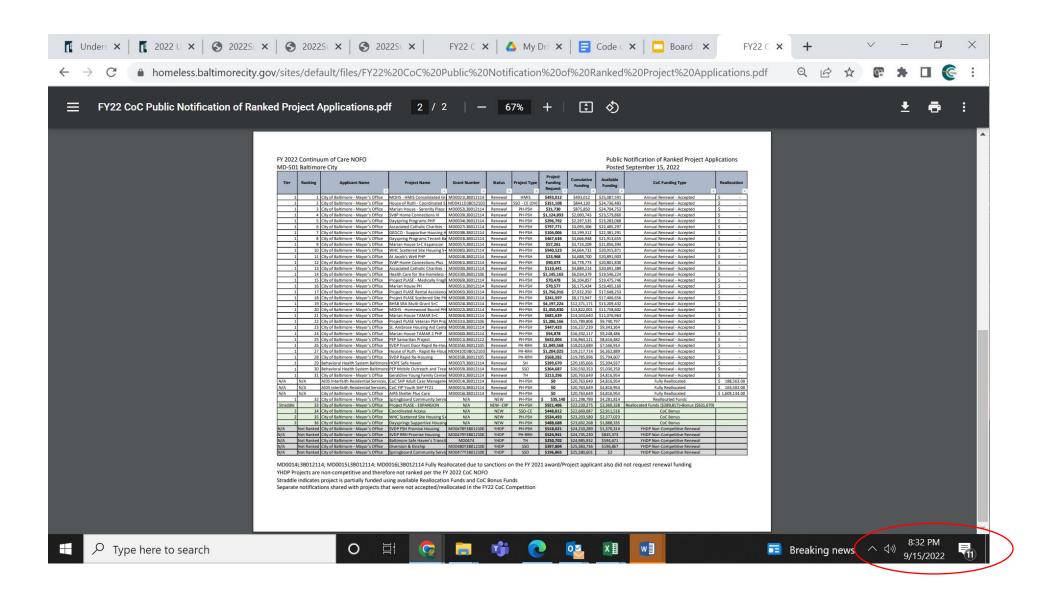












FY 2022 Continuum of Care NOFO MD-501 Baltimore City

Public Notification of Ranked Project Applications Posted September 15, 2022

		,								September 13, 2022		
Tier	Ranking	Applicant Name	Project Name	Grant Number	Status	Project Type	Project Funding Request	Cumulative Funding	Available Funding	CoC Funding Type	Re	eallocation
		· · · · · · · · · · · · · · · · · · ·	-	¥	_	· · · · · · ·	•	*	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	-	~
1		City of Baltimore - Mayor's Office	MOHS - HMIS Consolidated Gr		Renewal	HMIS	\$493,012	\$493,012	\$25,087,591	Annual Renewal - Accepted	\$	
1		City of Baltimore - Mayor's Office	House of Ruth - Coordinated E		Renewal	SSO - CE (DV)	\$351,108	\$844,120	\$24,736,483	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Marian House - Serenity Place		Renewal	PH-PSH	\$31,730	\$875,850	\$24,704,753	Annual Renewal - Accepted	\$	
1		City of Baltimore - Mayor's Office	SVdP Home Connections III	MD0039L3B012114	Renewal	PH-PSH	\$1,124,893	\$2,000,743	\$23,579,860	Annual Renewal - Accepted	\$	
1		City of Baltimore - Mayor's Office	Dayspring Programs PHP	MD0034L3B012114	Renewal	PH-PSH	\$296,792	\$2,297,535	\$23,283,068	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Associated Catholic Charities -		Renewal	PH-PSH	\$797,771	\$3,095,306	\$22,485,297	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	GEDCO - Supportive Housing H		Renewal	PH-PSH	\$104,006	\$3,199,312	\$22,381,291	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Dayspring Programs Tenant Ba		Renewal	PH-PSH	\$467,636	\$3,666,948	\$21,913,655	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Marian House S+C Expansion	MD0057L3B012114	Renewal	PH-PSH	\$57,261	\$3,724,209	\$21,856,394	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	WHC Scattered Site Housing S+		Renewal	PH-PSH	\$940,523	\$4,664,732	\$20,915,871	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	At Jacob's Well PHP	MD0018L3B012114	Renewal	PH-PSH	\$23,968	\$4,688,700	\$20,891,903	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	SVdP Home Connections Plus	MD0061L3B012114	Renewal	PH-PSH	\$90,073	\$4,778,773	\$20,801,830	Annual Renewal - Accepted	\$	
1		City of Baltimore - Mayor's Office	Associated Catholic Charities -		Renewal	PH-PSH	\$110,441	\$4,889,214	\$20,691,389	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Health Care for the Homeless -		Renewal	PH-PSH	\$1,145,165	\$6,034,379	\$19,546,224	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Project PLASE - Medically Fragi		Renewal	PH-PSH	\$70,478	\$6,104,857	\$19,475,746	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Marian House PH	MD0051L3B012114	Renewal	PH-PSH	\$70,577	\$6,175,434	\$19,405,169	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Project PLASE Rental Assistance		Renewal	PH-PSH	\$1,756,916	\$7,932,350	\$17,648,253	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Project PLASE Scattered Site PF		Renewal	PH-PSH	\$241,597	\$8,173,947	\$17,406,656	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	BHSB SRA Multi-Grant S+C	MD0024L3B012114	Renewal	PH-PSH	\$4,197,224	\$12,371,171	\$13,209,432	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	MOHS - Homewood Bound PH		Renewal	PH-PSH	\$1,450,830	\$13,822,001	\$11,758,602	Annual Renewal - Accepted	\$	-
1		City of Baltimore - Mayor's Office	Marian House TAMAR S+C	MD0064L3B012114	Renewal	PH-PSH	\$681,639	\$14,503,640	\$11,076,963	Annual Renewal - Accepted	\$	-
1	22	City of Baltimore - Mayor's Office	Project PLASE Veteran PSH Pro	MD0331L3B012106	Renewal	PH-PSH	\$1,286,166	\$15,789,806	\$9,790,797	Annual Renewal - Accepted	\$	-
1	23	City of Baltimore - Mayor's Office	St. Ambrose Housing Aid Cente	MD0058L3B012114	Renewal	PH-PSH	\$447,433	\$16,237,239	\$9,343,364	Annual Renewal - Accepted	\$	-
1	24	City of Baltimore - Mayor's Office	Marian House TAMAR 2 PHP	MD0060L3B012114	Renewal	PH-PSH	\$94,878	\$16,332,117	\$9,248,486	Annual Renewal - Accepted	\$	-
1	25	City of Baltimore - Mayor's Office	PEP Samaritan Project	MD0011L3B012112	Renewal	PH-PSH	\$632,004	\$16,964,121	\$8,616,482	Annual Renewal - Accepted	\$	-
1	26	City of Baltimore - Mayor's Office	SVDP Front Door Rapid Re-Hou	MD0356L3B012105	Renewal	PH-RRH	\$1,049,568	\$18,013,689	\$7,566,914	Annual Renewal - Accepted	\$	-
1	27	City of Baltimore - Mayor's Office	House of Ruth - Rapid Re-Hous	MD0410D3B012103	Renewal	PH-RRH	\$1,204,025	\$19,217,714	\$6,362,889	Annual Renewal - Accepted	\$	-
1	28	City of Baltimore - Mayor's Office	SVDP Rapid Re-Housing	MD0358L3B012105	Renewal	PH-RRH	\$568,282	\$19,785,996	\$5,794,607	Annual Renewal - Accepted	\$	-
1	29	Behavioral Health System Baltimore	HOPE Safe Haven	MD0037L3B012114	Renewal	SH	\$399,670	\$20,185,666	\$5,394,937	Annual Renewal - Accepted	\$	-
1	30	Behavioral Health System Baltimore	PEP Mobile Outreach and Trea	MD0059L3B012114	Renewal	SSO	\$364,687	\$20,550,353	\$5,030,250	Annual Renewal - Accepted	\$	-
1	31	City of Baltimore - Mayor's Office	Geraldine Young Family Center	MD0091L3B012114	Renewal	TH	\$213,296	\$20,763,649	\$4,816,954	Annual Renewal - Accepted	\$	-
N/A	N/A	AIDS Interfaith Residential Services,	CoC SHP Adult Case Managem	MD0014L3B012114	Renewal	PH-PSH	\$0	\$20,763,649	\$4,816,954	Fully Reallocated	\$	188,563.00
N/A	N/A	AIDS Interfaith Residential Services,	CoC YIP Youth SHP FY21	MD0015L3B012114	Renewal	PH-PSH	\$0	\$20,763,649	\$4,816,954	Fully Reallocated	\$	163,502.00
N/A	N/A	City of Baltimore - Mayor's Office	AIRS Shelter Plus Care	MD0016L3B012114	Renewal	PH-PSH	\$0	\$20,763,649	\$4,816,954	Fully Reallocated	\$ 1	1,609,134.00
1	32	City of Baltimore - Mayor's Office	Springboard Community Service	N/A	NEW	PH-PSH	\$ 535,140	\$21,298,789	\$4,281,814	Reallocated Funds		
Straddle	33	City of Baltimore - Mayor's Office	Project PLASE - EXPANSION	N/A	NEW- EXP	PH-PSH	\$921,486	\$22,220,275	\$3,360,328	Reallocated Funds (\$289,817)+Bonus (\$631,670)		
2		City of Baltimore - Mayor's Office	Coordinated Access	N/A	NEW	SSO-CE	\$448,812	\$22,669,087	\$2,911,516	CoC Bonus		
2	35	City of Baltimore - Mayor's Office	WHC Scattered Site Housing S+	N/A	NEW	PH-PSH	\$534,493	\$23,203,580	\$2,377,023	CoC Bonus		
2		City of Baltimore - Mayor's Office	Daysprings Supportive Housing		NEW	PH-PSH	\$488,688	\$23,692,268	\$1,888,335	CoC Bonus		
N/A		City of Baltimore - Mayor's Office	SVDP PSH Promise Housing	MD0478Y3B012100	YHDP	PH-PSH	\$518,021	\$24,210,289	\$1,370,314	YHDP Non-Competitive Renewal		
		City of Baltimore - Mayor's Office	SVDP RRH Promise Housing	MD0479Y3B012100	YHDP	PH-RRH	\$524,941		\$845,373	YHDP Non-Competitive Renewal		
		City of Baltimore - Mayor's Office	Baltimore Safe Haven's Transit	MD0474	YHDP	TH		\$24,985,932	\$594,671	YHDP Non-Competitive Renewal		
- +		City of Baltimore - Mayor's Office	Diversion & Kinship	MD0480Y3B012100	YHDP	SSO	\$397,804		\$196,867	YHDP Non-Competitive Renewal		
		'	· •		YHDP	SSO				YHDP Non-Competitive Renewal		
2 2 2 N/A N/A N/A N/A	33 34 35 36 Not Ranked Not Ranked Not Ranked	City of Baltimore - Mayor's Office	Project PLASE - EXPANSION Coordinated Access WHC Scattered Site Housing S+ Daysprings Supportive Housing SVDP PSH Promise Housing SVDP RRH Promise Housing Baltimore Safe Haven's Transit	N/A N/A N/A N/A N/A MD0478Y38012100 MD0479Y38012100 MD0474 MD0480Y38012100	NEW- EXP NEW NEW YHDP YHDP YHDP YHDP	PH-PSH SSO-CE PH-PSH PH-PSH PH-PSH PH-RRH TH SSO	\$921,486 \$448,812 \$534,493 \$488,688 \$518,021 \$524,941 \$250,702	\$22,220,275 \$22,669,087 \$23,203,580 \$23,692,268 \$24,210,289 \$24,735,230	\$3,360,328 \$2,911,516 \$2,377,023 \$1,888,335 \$1,370,314 \$845,373 \$594,671	Reallocated Funds (\$289,817)+Bonus (\$280,817)+Bonus (\$200,0000000000000000000000000000000000	val val val	val val val

MD0014L3B012114; MD0015L3B012114 Fully Reallocated due to sanctions on the FY 2021 award/Project applicant also did not request renewal funding YHDP Projects are non-competitive and therefore not ranked per the FY 2022 CoC NOFO
Straddle indicates project is partially funded using available Reallocation Funds and CoC Bonus Funds
Separate notifications shared with projects that were not accepted/reallocated in the FY22 CoC Competition

Applicant Name	Project Name	Grant Number	Total Award Amount Requested	Project Score	Ranking	Tier	Project Accepted/ Rejected
City of Baltimore - Mayor's Office	MOHS - HMIS Consolidated Grant	MD0021L3B012114	\$493,012	100.0%	1	1	Accepted
City of Baltimore - Mayor's Office	House of Ruth - Coordinated Entry SSO - DV Bonus	MD0411D3B012103	\$351,108	100.0%	2	1	Accepted
City of Baltimore - Mayor's Office	Marian House - Serenity Place PHP	MD0052L3B012114	\$31,730	84.5%	3	1	Accepted
City of Baltimore - Mayor's Office	SVdP Home Connections III	MD0039L3B012114	\$1,124,893	82.5%	4	1	Accepted
City of Baltimore - Mayor's Office	Dayspring Programs PHP	MD0034L3B012114	\$296,792	82.5%	5	1	Accepted
City of Baltimore - Mayor's Office	Associated Catholic Charities - REACH Combined	MD0027L3B012114	\$797,771	82.5%	6	1	Accepted
City of Baltimore - Mayor's Office	GEDCO - Supportive Housing Harford House and Micah House	MD0038L3B012114	\$104,006	77.5%	7	1	Accepted
City of Baltimore - Mayor's Office	Dayspring Programs Tenant Based S+C	MD0033L3B012114	\$467,636	77.0%	8	1	Accepted
City of Baltimore - Mayor's Office	Marian House S+C Expansion	MD0057L3B012114	\$57,261	77.0%	9	1	Accepted
City of Baltimore - Mayor's Office	WHC Scattered Site Housing S+C	MD0085L3B012114	\$940,523	76.5%	10	1	Accepted
City of Baltimore - Mayor's Office	At Jacob's Well PHP	MD0018L3B012114	\$23,968	75.5%	11	1	Accepted
City of Baltimore - Mayor's Office	SVdP Home Connections Plus	MD0061L3B012114	\$90,073	75.0%	12	1	Accepted
City of Baltimore - Mayor's Office	Associated Catholic Charities - Project FRESH Start	MD0030L3B012114	\$110,441	74.5%	13	1	Accepted
City of Baltimore - Mayor's Office	Health Care for the Homeless - Homewood Bound Bonus	MD0330L3B012106	\$1,145,165	72.5%	14	1	Accepted
City of Baltimore - Mayor's Office	Project PLASE - Medically Fragile SRO	MD0069L3B012114	\$70,478	72.5%	15	1	Accepted

MD-501: Final Project Scores for All Projects

City of Baltimore - Mayor's Office	Marian House PH	MD0051L3B012114	\$70,577	72.0%	16	1	Accepted
City of Baltimore - Mayor's Office	Project PLASE Rental Assistance Program	MD0065L3B012114	\$1,756,916	72.0%	17	1	Accepted
City of Baltimore - Mayor's Office	Project PLASE Scattered Site PHP	MD0068L3B012114	\$241,597	70.5%	18	1	Accepted
City of Baltimore - Mayor's Office	BHSB SRA Multi-Grant S+C	MD0024L3B012114	\$4,197,224	70.5%	19	1	Accepted
City of Baltimore - Mayor's Office	MOHS - Homewood Bound PHP	MD0022L3B012114	\$1,450,830	830 70.0%		1	Accepted
City of Baltimore - Mayor's Office	Marian House TAMAR S+C	MD0064L3B012114	\$681,639	69.5%	21	1	Accepted
City of Baltimore - Mayor's Office	Project PLASE Veteran PSH Project	MD0331L3B012106	\$1,286,166	67.5%	22	1	Accepted
City of Baltimore - Mayor's Office	St. Ambrose Housing Aid Center PHP	MD0058L3B012114	\$447,433	64.5%	23	1	Accepted
City of Baltimore - Mayor's Office	Marian House TAMAR 2 PHP	MD0060L3B012114	\$94,878	64.5%	24	1	Accepted
City of Baltimore - Mayor's Office	PEP Samaritan Project	MD0011L3B012112	\$632,004	53.5%	25	1	Accepted
City of Baltimore - Mayor's Office	SVDP Front Door Rapid Re-Housing	MD0356L3B012105	\$1,049,568	74.5%	26	1	Accepted
City of Baltimore - Mayor's Office	House of Ruth - Rapid Re-Housing - DV Bonus	MD0410D3B012103	\$1,204,025	69.0%	27	1	Accepted
City of Baltimore - Mayor's Office	SVDP Rapid Re-Housing	MD0358L3B012105	\$568,282	65.5%	28	1	Accepted
Behavioral Health System Baltimore	HOPE Safe Haven	MD0037L3B012114	\$399,670	100.0%	29	1	Accepted
Behavioral Health System Baltimore	PEP Mobile Outreach and Treatment Project	MD0059L3B012114	\$364,687	100.0%	30	1	Accepted
City of Baltimore - Mayor's Office	Geraldine Young Family Center Transitional Housing	MD0091L3B012114	\$213,296	65.0%	31	1	Accepted
AIDS Interfaith Residential Services, Inc.	CoC SHP Adult Case Management FY21	MD0014L3B012114	\$0	N/A	N/A	N/A	Rejected
AIDS Interfaith Residential Services, Inc.	CoC YIP Youth SHP FY21	MD0015L3B012114	\$0	N/A	N/A	N/A	Rejected

MD-501: Final Project Scores for All Projects

City of Baltimore - Mayor's Office	AIRS Shelter Plus Care	MD0016L3B012114	\$0	N/A	N/A	N/A	Rejected
City of Baltimore - Mayor's Office	Springboard Community Services	NEW - PSH	\$ 535,140	98.9%	32	1	Accepted
City of Baltimore - Mayor's Office	Project PLASE - EXPANSION	NEW - PSH EXPANSION	\$921,486	97.2%	33	1/2	Accepted
City of Baltimore - Mayor's Office	Coordinated Access	NEW - SSO- CE	\$448,812	93.1%	34	2	Accepted
City of Baltimore - Mayor's Office	WHC Scattered Site Housing S+C	NEW - PSH	\$534,493	91.9%	35	2	Accepted
City of Baltimore - Mayor's Office	Daysprings Supportive Housing Program 2022	NEW - PSH	\$488,688	91.7%	36	2	Accepted
City of Baltimore - Mayor's Office	Community Housing Associates PSH	NEW - PSH	\$0	77.1%	N/A	N/A	Rejected
City of Baltimore - Mayor's Office	For My Kidz	NEW - SSO- CE	\$0	0.0%	N/A	N/A	Rejected
City of Baltimore - Mayor's Office	SVDP PSH Promise Housing	MD0478Y3B012100	\$518,021	100.0%	YHDP	N/A	Accepted
City of Baltimore - Mayor's Office	SVDP RRH Promise Housing	MD0479Y3B012100	\$524,941	100.0%	YHDP	N/A	Accepted
City of Baltimore - Mayor's Office	Baltimore Safe Haven's Transitional Housing	MD0474	\$250,702	100.0%	YHDP	N/A	Accepted
City of Baltimore - Mayor's Office	Diversion & Kinship	MD0480Y3B012100	\$397,804	100.0%	YHDP	N/A	Accepted
City of Baltimore - Mayor's Office	Springboard Community Services COMPASS	MD0477Y3B012100	\$196,865	100.0%	YHDP	N/A	Accepted

Additional Details on Final Scoring:

- 1. The following projects were reviewed by Baltimore City's CoC Resource Allocation Committee and scored accordingly to local priorities and CoC Board Approved Ranking Strategy:
 - a. HMIS (MD0021L3B012114) Renewal
 - b. SSO-CE (MD0411D3B012103) Renewal
 - c. Safe Haven (MD0037L3B012114) Renewal
 - d. SSO (MD0059L3B012114) Renewal
 - e. TH (MD0091L3B012114) Renewal
- 2. Tie Breakers: Projects that scored within the same project type will be broken in the following order (per the FY 2022 CoC Board Approved Scoring)
 - a. Highest % of clients exiting to or retaining permanent housing
 - b. Highest utilization rate
- 3. YHDP Projects were reviewed, however all YHDP renewal and replacement projects were not ranked per the FY 2022 CoC NOFO Program Competition
- 4. CoC Planning Project was not ranked per the FY 2022 CoC NOFO Program Competition
- 5. The following projects were not included since no renewal application was received and projects were reallocated during the FY 2022 CoC NOFO Program Competition:
 - a. MD0014L3B012114; MD0015L3B012114; MD0016L3B012114
- 6. The following project was rejected due to low score and limited funding available:
 - a. Community Housing Associates PSH NEW PSH Project
- 7. The following project did not pass the initial threshold review for a new project. Project was not scored and was rejected.
 - a. For My Kidz NEW SSO-CE

FY 2022 COC BOARD APPROVED - PROJECT RANKING PROCESS

Renewal Project Scoring

Renewal projects approved by the Resource Allocation Committee (RAC) for inclusion in the CoC project ranking will be scored according to an objective scoring tool based on their individual project performance, alignment with HUD and CoC policy priorities, and compliance. Project applications for YHDP renewal or replacement and CoC planning will not be listed on the CoC Priority Listing in rank order. Performance and HMIS elements are heavily weighted measures used by HUD in determining the overall CoC score for the NOFO. Data used in the project scoring tool comes largely from projects most recently submitted Annual Performance Report (APR), project compliance and monitoring reports, and HMIS data. Scoring tools are provided in the Appendix. First-time renewals are projects that have not yet completed their first operating year, and thus, cannot be scored for their performance due to not having a completed Annual Performance Report (APR). However, the RAC will evaluate each first time renewal to ensure that each project is achieving satisfactory progress.

New Project Selection

New project applicants will be assessed on the following: project design, how the project addresses local priority needs, how the project aligns with local strategies and HUD's Policy Priorities, budget appropriateness and accuracy, project match, leveraging, CoC participation, community collaboration, organizational capacity, use of Housing First, and implementation timeline. There may be new projects that fail to score well enough to be included in the NOFO submission, or there may not be enough new project funding to fund all requests. New project applicants are highly encouraged to review the new project application guide and instructions while preparing their application, which provide a wealth of resources on best practices, policies, procedures, and requirements. Scoring tools are provided in the Appendix.

Ranking Order

Renewal projects approved for inclusion (not being fully reallocated) in the CoC's project ranking will be ranked in the following order:

- 1. HMIS
- 2. Renewal Support Services coordinated entry (regular and domestic violence)
- 3. Renewal Permanent Supportive Housing projects, ranked in order of highest to lowest percentage score
- 4. Renewal Rapid Re-housing projects, ranked in order of highest to lowest percentage score
- 5. Renewal Supportive Services (Street outreach/ Housing Project or Housing Structure Specific), Safe Haven and Transitional Housing for youth, ranked in order of highest to lowest percentage score

New projects, including regular and domestic violence projects, will be ranked after the Resource Allocation Committee has evaluated all renewal projects. All new projects will be ranked in such a way to (1) maximize the CoC's overall application score; (2) maximize the score of Tier 2 projects and ensure the highest possibility of having projects funded; (3) increase the CoC's system performance; and (4) effectively meet HUD policies and priorities.

Tie-Breakers

Ties within the same project type will be broken in the following order:

• Highest % of clients exiting to or retaining permanent housing

MD-501: Final Project Scores for All Projects

Highest utilization rate

The Resource Allocation Committee may adjust individual projects up or down in the ranking or reallocate in order to fulfill HUD priorities, prevent potential losses of funding, and maximize the overall CoC application score. This includes:

- 1. Prioritizing projects that place greater emphasis on racial equity and have taken steps to eliminate barriers to improve racial equity, and have implemented measures to evaluate the efficacy of the steps taken.
- 2. Prioritizing projects addressing the needs of Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ+) individuals to place greater emphasis on CoCs implementing and training of their providers on the CoC-wide anti-discrimination policies that ensure LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination.

Youth Homelessness Demonstration Program

The Youth Homelessness Demonstration Program (awarded in August of 2019) is eligible for renewal or replacement in the FY 2022 CoC Competition. As a demonstration program and first-time renewals HUD has indicated that YHDP projects will not be ranked and will not fall under Tier 1 or Tier 2 funding. As demonstration projects, these projects will be renewed to their full award.

Irene Agustin
Director
Mayor's Office of Homeless Services
7 E. Redwood Street, 5th fl.
Baltimore, Maryland 21202



RE: Springboard Community Services— Cash Match Letter SCS Youth Permanent Housing Program

Dear Ms. Agustin,

I am writing to you regarding Springboard Community Services' new application for Youth Supportive Housing Program under the FY 2022 CoC Program Competition.

Please let this letter serve as our commitment to provide cash match in the amount of \$26,400 for Mental Health Support Services provided by Springboard Community Services' Outpatient Mental Health Center (OMHC). Each session is valued at \$110 and this match is based on a total of 240 sessions provided to CoC eligible clients per year. This cash match will be available starting October 1, 2023 for the grant period, October 1, 2023 through September 30, 2024.

Project eligibility for program participants in the new Permanent Housing – Permanent Supportive Housing if funded will be based on CoC Program fair housing requirements and will not be restricted by the health care service provider.

Type of Commitment	Cash
Type of Source (Private, Government)	Private
Name the Source of the Commitment (Be as specific as possible and include the office or grant program as applicable)	Leonard & Helen R. Stulman Charitable Foundation
Date of Written Commitment	July 19, 2022
Value of Written Commitment	\$ 26,400



Thank you for your continued support of this project. If there are any questions, please do not hesitate to contact me at (410) 366-1980 or via e-mail at ftburden@scsmd.org.

Sincerely,

F. T. Burden

Chief Executive Officer