



PHA Profile: Housing Authority of the City of Baltimore Preference for Chronically Homeless Households Housing Choice Voucher Program

Basic PHA Stats

Location: Baltimore, Maryland
Housing Choice Vouchers: 18,874
Public Housing Apartments: 11,616

Program Description

The Housing Authority of Baltimore City (HABC) created a set-aside of 500 of its Housing Choice Vouchers in order to serve chronically homeless households as determined and referred by the Baltimore City Mayor's Office of Homeless Services.

Motivation

HABC is a partner with the Mayor's Office in its 10-year plan to end homelessness, *The Journey Home*.

Resources Required

This program did not require MTW status. HABC did not receive any special funding from HUD for its initiative.

Challenges

HABC feels that it can be challenging to ensure that the homeless population receives needed wrap-around supportive services.

Rewards

It is rewarding to provide housing and supportive services for homeless families.

Partners

HABC is in the process of drafting a Memorandum of Understanding with the Mayor's Office of Homeless Services, which facilitates external partnership with service providers, advocacy groups and shelters.

Documentation Changes Made

Document	Access the Documents
Admin Plan	See attached "Baltimore City Admin Plan Excerpt" pages 4-4 and 4-5.
Procedure Documents	See attached "Baltimore City Admin Plan Excerpt" page AS-1: Homeless Initiative Referral Form.

Words of Wisdom from Baltimore

"Since the inception of the program HCVP has provided rental assistance for over 400 homeless families. We recommend that an agency enters into a Memorandum of Understanding (MOU) with the partnering agencies prior to the initiation of the program to identify agencies' roles. We also recommend monitoring very closely the wrap around services and termination reasons."

Contact Person for PHAs Interested in Implementing a Similar Program

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Chapter 4

ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST

INTRODUCTION

It is the 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, the 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.

The HABC maintains a single waiting list for admissions to its Housing Choice Voucher program, and a separate waiting list for its low-income public housing program. Therefore, if:

- The Section 8 waiting list is open when an applicant is placed on the low-income public housing program, the Authority will offer to place the applicant on the Section 8 waiting list.
- The low-income public housing waiting list is open when an applicant is placed on the Section 8 waiting list, and the low-income public housing program contains units that are suitable for the applicant, the Authority will offer to place the applicant on its waiting list.

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.

For the purpose of this discussion, it is important to keep in mind 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 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., awaiting third party verification, or re-scheduled after missing an interview appointment).

A. WAITING LIST

The 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 the HABC waiting list in accordance with policies, preferences and income targeting requirements defined in this Administrative Plan. The 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 (number of bedrooms family qualifies for under HABC subsidy standards)
- 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

B. ORDER OF SELECTION

The HABC 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.

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 according to date and time.

HUD Notice PIH 98-64 eliminated the requirement for public notice and a period for public comment when changing the HABC preference system. However, the 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 impracticable to do so because of the length of the waiting list, the 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 assisted 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:

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.

Preference 2 – Referrals Only

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

Preference 3

(a) Either the head of household, spouse or sole member of the family is:

- employed;
- age 62 or older;
- enrolled in an approved job training program; or
- a veteran.

(b) A family where one or more member is a person with a disability.

Residency Preference: The 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.

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.

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 the HABC in writing when their circumstances change.

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.

If the HABC denies a preference, the 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 placed on the waiting list without benefit of the

preference. Applicants may exercise other rights if they believe they have been discriminated against.

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.

C. UPDATING THE WAITING LIST

Applicants are required to inform the HABC in writing of changes in address.

In order to have an adequate number of verified files, it is necessary to have a current and updated Waiting List. HABC will periodically review 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 30 working 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.

D. 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 90 days from the date of their removal from the list. 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 and date and time of original application.

E. SET-ASIDE OF VOUCHERS FOR FAMILIES WITH DISABILITIES

850 Housing Choice Vouchers and 500 Project-Based Vouchers will be set-aside for issuance to non-elderly persons with disabilities, as that term is defined in 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). These vouchers will be offered in order by date and time of application to non-elderly persons with disabilities on the waiting list who have been found eligible for the HCVP and, while it is in

existence, who are participating in the Enhanced Leasing Assistance Program (see below), until the vouchers are exhausted. As vouchers expire, they will be offered to the next eligible family.

As part of the ten year plan to end homelessness, non-elderly persons with disabilities on the waiting list who are also chronically homeless and who participate in the Enhanced Leasing Assistance Program may receive priority for the 1350 *Bailey* set aside vouchers over non-elderly persons who are not chronically homeless. A coordinated effort by Baltimore Homeless Services, HABC, and the organizations and agencies overseeing the Bailey Consent Decree will identify qualifying non-elderly persons with disabilities who are chronically homeless who will qualify for this priority status. Individuals eligible for this housing will include those with mental illnesses, HIV/AIDS, and developmental disabilities, but does not include individuals whose disability is based solely on any drug or alcohol dependence due to HUD regulations.

HABC has established the Enhanced Leasing Assistance Program (ELAP) which is being implemented by an outside contractor. The ELAP provides housing search assistance to non-elderly persons with disabilities as defined in and in accordance with the Bailey Consent Decree

The following are the elements of the Program:

1. ELAP will be administered either by an outside contractor or by HABC staff hired specifically to administer it.
2. Services provided through ELAP will include:
 - a. Administration of a funding stream for reasonable application fees, security deposits, utility hook-up fees and necessary reasonable accommodations/modifications for Program participants;
 - b. Housing search assistance;
 - c. 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;
 - d. 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 ELA Program participants).

F. INCOME TARGETING

In accordance with the Quality Housing and Work Responsibility Act of 1998, for each fiscal year the 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." The 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, we will skip applicants on the waiting list until the first extremely low-income family is reached.

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

The HABC is also exempted from this requirement where the 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.

G. 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.

H. SPECIAL ADMISSIONS

Admission of a family that is not on the HABC waiting list or without considering the applicant's waiting list position is called a special admission. Special admissions occur when HUD gives the HABC program funding for families living in specified units as opposed to a special category of persons on the waiting list. 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 other event.

The tenant-based assistance program rules provide that when HUD awards the HABC program funding that is targeted for families that live in specified units, the HABC must use the assistance for families living in these units. The HABC may admit a family that is not on the HABC waiting list, or without considering the family's waiting list position; and, in accordance with Section 982.203(a). The HABC must maintain records showing the family was admitted with HUD targeted assistance.

The 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, the HABC does not use special admissions to solve over-or under-crowded situations, for persons that require terminal ill care, rehabilitation purposes, etc. However, the HABC may use its system of local preferences (approved by the Board) to address these situations.

If HUD awards funding that is targeted for families living in specific units, the HABC is to use the funding for that purpose. The HABC will use the targeted funding in accordance with the conditions imposed when the funds are awarded to and accepted by the 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 the HABC Housing Choice Voucher Program. Re-issuance of these vouchers will be made in accordance with waiting list procedures.

The 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. The HABC must also maintain an accounting of each voucher issuance, turnover and placement in the general voucher program.

I. SET-ASIDE VOUCHERS FOR FAMILIES WITH CHILDREN WITH ELEVATED BLOOD LEAD LEVELS

Subject to availability of funding two hundred (200) Housing Choice Vouchers will be set-aside for issuance to families with children with elevated blood lead levels as determined and referred by the Baltimore City Health Department, the Maryland Department of the Environment or other appropriate agency.

J. SET-ASIDE VOUCHERS FOR CHRONICALLY HOMELESS HOUSEHOLDS

Subject to availability of funding, up to five hundred (500) Housing Choice Vouchers will be set-aside for issuance to eligible chronically homeless households as determined and referred by Baltimore Homeless Services (BHS).

K. SET-ASIDE VOUCHERS FOR EX-OFFENDERS

Subject to availability of funding, two hundred (200) Housing Choice Vouchers will be set-aside for issuance to ex-offenders participating in a reentry program developed and operated by the Mayor's Office on Criminal Justice and as determined and referred by the coordinator of that program.).

L. SET-ASIDE VASH VOUCHERS

HABC was awarded seventy-five(75) Veterans Affairs Supportive Housing (VASH) vouchers, funded by the U.S. Department of Housing and Urban Development, 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.

M. SET-ASIDE VOUCHERS FOR NEDS

HABC was awarded forty (40) vouchers, funded through a grant from the U.S. Department of Housing and Urban Development, 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 Maryland Department of Health and Mental Hygiene under Medicaid's Money Follows the Person (MFP) program. The department also provides care/case management to referees and links them to needed health and social services.

N. PROJECT BASED PROGRAM

(See Chapter 20)

O. HOMEOWNERSHIP

(See Chapter 19)

HOUSING AUTHORITY OF BALTIMORE CITY

Housing Choice Voucher Program

Procedure: Application Screening, Eligibility and Denial of Assistance For Criminal Activity

INTRODUCTION & SCOPE

All applicants for the Housing Choice Voucher (Section 8) Program (HCVP) must be subject to a screening process in accordance with Department of Housing and Urban Development (HUD) rules and regulations and the HABC Administrative Plan for the HCVP. The screening consists of a criminal background investigation of the family, including the head of household (HOH), spouse/co-head and all other family members 14 years of age and older. Except for applicants referred to the Housing First Voucher Program and the Ex-Offender Voucher Program, the HABC will deny admission to applicants in cases where evidence, in the form of misdemeanor or felony convictions, demonstrates that the HOH or any of the household members engage in drug-related criminal activity, violent criminal activity, or other criminal activity that interferes with the health, safety or right to peaceful enjoyment of other residents. For applicants referred to the Housing First Voucher Program, HABC will conduct criminal background screening for felony convictions which demonstrate that the HOH or any of the household members engaged in drug-related criminal activity, violent criminal activity, or other criminal activity that interferes with the health, safety or right to peaceful enjoyment of other residents.

For applicants referred to the Ex-Offender Voucher Program, HABC will conduct criminal background screening only in cases involving a conviction for which federal law requires a denial of admission.

Federal Mandatory Denial of Admission

All applicants, including those referred to the Housing First Voucher Program and the Ex-Offender Voucher Program, will be permanently denied admission if:

- a) Any household member has ever been convicted of drug-related criminal activity for the manufacture or production of methamphetamine on the premises of federally assisted housing; or
- b) Any household member is subject to a lifetime registration requirement under Maryland's Sex Offender Registration Program found at Title 11, Subtitle 7 of the Criminal Procedure Article of the Maryland Annotated Code, as amended.

RELATED DOCUMENTS AND LEGAL AUTHORITY

42 U.S.C. §1437f; 42 U.S.C §13661; 24 C.F.R.§§ 982.4, 982.54, 982.552, 982.553, 982.554; 24 C.F.R. § 5.100; HCVP Administrative Plan; Conviction & Denial Factor Key; Informal Review Request Form; Informal Review Form; Exclusion Agreement Form; Administrative Review Request Form

PROCEDURE



**HOUSING AUTHORITY OF BALTIMORE CITY
HOUSING CHOICE VOUCHER PROGRAM**

HOMELESS INITIATIVE REFERRAL FORM

Referral #: _____ Referral Date: _____

Referral Type: Homeless Referral NED/ Homeless Referral

Household:

Relationship	Last Name	First Name	MI	Soc Sec No.	DOB	Age	CBC*
HOH							

Relationship:
 HOH – head of household
 S – spouse
 M – minor
 O – other adult

*CBC – Criminal Background Check is required
 required for all household members
 14 years of age or older.

HOH Current Address: _____ Phone Number: _____

Supporting Agency

Name: _____ Contact: _____ Phone: _____

This household is currently residing in a shelter:

I certify that the above household meets the definition of a Chronically Homeless Household: An individual or family who is homeless continuously for at least one (1) year or has been homeless on at least four (4) separate occasions in the last three (3) years).

Signature: _____ Title: **President, Baltimore Office of Homeless Services**
 Date: _____

Return the completed form to: *HABC, Housing Choice Voucher Office, 1225 W. Pratt St, Baltimore, MD, 21223, Attn: Applications and Waiting List Team*

For HCVP Office Use Only:

Date Referral Received: _____

Action: Date of Action: _____

Referral Accepted
 Referral Rejected (enter reason for rejection): _____

Date Returned to Office of Homeless Services _____