

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																
A.1	<p> PHA Name: <u>Housing Opportunities Commission of Montgomery County</u> PHA Code: <u>MD004</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>0</u> Number of Housing Choice Vouchers (HCVs) <u>7,702</u> Total Combined Units/Vouchers <u>7,702</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA: Not Applicable</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA: Not Applicable																							
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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Please see attached narrative for details on updates to HOC's Housing Choice Voucher Administrative Plan, Voucher Payment Standard Increase, and Family Self Sufficiency Action Plan.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p>

B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>Please reference HUD form 50075.2 approved by HUD on 120/30/2020. The Capital Fund Program Five-Year Action Plan describes the capital improvements necessary to ensure the long-term physical and social viability of HOC's Public Housing Projects.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: Please see narrative for details.</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>The RAB will review the PHA Plan, provide any comments, and submit a letter of endorsement. HOC staff will address any comments in the narrative.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> <p>Any challenged elements will be addressed in the narrative upon completion of this report.</p>
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

D.	Affirmatively Furthering Fair Housing (AFFH).							
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>HOC has not yet been required to submit an Assessment of Fair Housing (AFH).</p> <table border="1" data-bbox="180 709 1455 1161"> <tr> <td data-bbox="180 709 1455 751">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="180 751 1455 793"><i>Describe fair housing strategies and actions to achieve the goal</i></td> </tr> <tr> <td data-bbox="180 793 1455 1161"> <p>HOC continues to operate a Customer Relationship Management system to streamline the customer complaints and Reasonable Accommodation process. This system allows HOC staff to receive and track customer concerns electronically for timely resolution. This tool allows HOC to identify and track root causes of issues and solutions.</p> </td> </tr> </table> <table border="1" data-bbox="180 1186 1455 1602"> <tr> <td data-bbox="180 1186 1455 1228">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="180 1228 1455 1270"><i>Describe fair housing strategies and actions to achieve the goal</i></td> </tr> <tr> <td data-bbox="180 1270 1455 1602"> <p>HOC continues to advertise PHA Plans, HCV Administrative Plan updates, and other relevant items to the Spanish-speaking community. HOC implemented a Language Access Plan (LAP) intranet page for staff to access all LAP resources in order for staff to assist Limited English Proficient individuals. HOC continues to train staff and third party management agents on the Language Access requirements.</p> </td> </tr> </table> <table border="1" data-bbox="180 1627 1455 1665"> <tr> <td data-bbox="180 1627 1455 1665">Fair Housing Goal:</td> </tr> </table>	Fair Housing Goal:	<i>Describe fair housing strategies and actions to achieve the goal</i>	<p>HOC continues to operate a Customer Relationship Management system to streamline the customer complaints and Reasonable Accommodation process. This system allows HOC staff to receive and track customer concerns electronically for timely resolution. This tool allows HOC to identify and track root causes of issues and solutions.</p>	Fair Housing Goal:	<i>Describe fair housing strategies and actions to achieve the goal</i>	<p>HOC continues to advertise PHA Plans, HCV Administrative Plan updates, and other relevant items to the Spanish-speaking community. HOC implemented a Language Access Plan (LAP) intranet page for staff to access all LAP resources in order for staff to assist Limited English Proficient individuals. HOC continues to train staff and third party management agents on the Language Access requirements.</p>	Fair Housing Goal:
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N/A

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” (24 CFR §903.7)

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

HOPE VI or Choice Neighborhoods. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 . (Notice PIH 2011-47)

Mixed Finance Modernization or Development. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and **2)** A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, **5)** the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.503\)](#) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.505\)](#) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan ([24 CFR §903.7\(b\)](#)).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA

fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.



10400 Detrick Avenue
Kensington, MD 20895-2484
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Fiscal Year (“FY”) 2024 Annual Public Housing Agency (“PHA”) Plan Submission Housing Opportunities Commission of Montgomery County (“HOC”) Narrative and Additional Information

A1: PHA Information

The Public may view the PHA Plan and supporting documentation and obtain information regarding any of the activities outlined in this plan at HOC’s website, www.hocmc.org, or any HOC office, which are currently open to the public.

Kensington Headquarters

10400 Detrick Avenue
Kensington, MD 20895

HOC Gaithersburg Customer Service Center

101 Lake Forest Blvd.
Suite 200
Gaithersburg, Maryland 20877

HOC Silver Spring Customer Service Center

880 Bonifant Street
Silver Spring, Maryland 20910

HOC East Deer Park Office

231 East Deer Park Drive
Gaithersburg, Maryland 20877

Documents available for public view and comment are as follows:

1. Form HUD-50057-ST-HCV-HP: PHA Certification of Compliance with the PHA Plans and Related Regulations;
2. HUD Form 50077-CR: Civil Rights Certification;
3. Resident Advisory Board PHA Plan Endorsement Letter;
4. Form HUD 50077-SL: Certification by State or Local Official of PHA Plan’s Consistency with the Consolidated Plan or State Consolidated Plan;
5. HOC’s FY 2020-2024 Five Year PHA Plan and FY 2023 Annual PHA Plans;
6. Housing Choice Voucher Administrative Plan;
7. Housing Choice Voucher Family Self Sufficiency (“FSS”) Action Plan;

8. Public Housing Admissions and Continued Occupancy Policy;
9. HOC's Grievance Procedures;
10. Public Housing Capital Fund Program Five-Year Action Plan: 2017-2021; and
11. HOC's Violence Against Women Act Policy.

Pursuant to Section 511 of the United States Housing Act and the regulations in 24 CFR part 903, HOC is required to establish a Resident Advisory Board (“RAB”). The RAB is composed of individuals who reflect and represent the residents assisted by HOC. Their role is to assist HOC in developing the PHA Plan. The RAB will review the proposed FY 2024 Annual PHA Plan draft and will provide a letter of endorsement. The letter of endorsement will be posted as indicated above once received.

This FY 2024 Annual PHA Plan includes a minimum 45-day public comment period, which began February 16, 2023, and will culminate with a public hearing on April 3, 2023. HOC provides opportunities to submit public comments via phone, mail, and email. Interested parties are invited to attend the public hearing in person or virtually. Details are posted on HOC's website at www.hocmc.org and are available at the physical office locations listed above.

B1: Revision of Plan Elements

Although HOC no longer operates Public Housing (“PH”) units, as part of HOC's RAD portfolio conversion, HOC elected not to close out the PH program. HOC currently has PH Capital Fund Program (“CFP”) funds that have been budgeted through HUD's EPIC system. HOC is exploring its use of the Faircloth Limit for future potential development under the RAD program. HOC's Public Housing Admissions and Continued Occupancy Policy (“ACOP”) previously governed HOC's PH program. Since HOC has converted all of its PH units, this document is no longer relevant.

HOC is in the final stage of the overall closeout of the RAD program. Elizabeth House III is the final project to be completed under RAD. HOC will officially close out this project through the RAD Resource Desk once in receipt of the Completion Certification and all residents are relocated to the new property. Construction on the residential portion has reached substantial completion as of February 2023. HOC will begin the process of relocating existing RAD tenants to their new units. The RAD Project-Based Rental Assistance (“PBRA”) and Project-Based Voucher (“PBV”) Housing Assistance Payment (“HAP”) contracts are tied to the new Leggett (formerly, Elizabeth House III) property.

HOC's Housing Choice Voucher (“HCV”) and PBV programs are governed by HOC's Administrative Plan. The Administrative Plan derives its layout and much of its content from the Code of Federal Regulations (CFR), Title 24, Part 982—Section 8 Tenant Based Assistance: Housing Choice Voucher Program and Title 24, and Part 983.

- HOC's policies for HCV eligibility for admission are established in Chapter Two of the HOC Administrative Plan.
- HOC's policies for persons applying for HCV admission are established in Chapter Three of the

HOC Administrative Plan.

- HOC's HCV waitlist and selection processes are established in Chapter Three of the HOC's Administrative Plan.
- All of HOC's PBV policies are established in Chapter 22 of the HOC Administrative Plan.

Eligibility for HOC's HCV program is determined when an applicant is called from the waitlist. HOC uses the following criteria for screening applicants:

- a. An applicant must be a "family". A family may be a single person or group of persons.
- b. An applicant must be within the appropriate Income Limits.
- c. An applicant must furnish Social Security Numbers for all family members.
- d. An applicant must furnish Declaration of Citizenship and Eligible Immigrant Status and verification where required.
- e. At least one member of the applicant family must be either a U.S. citizen or have eligible immigration status before the PHA may provide any financial assistance.
- f. Criminal or drug related activity only to the extent required by law or regulation including criminal records from local and state law enforcement agencies. HOC checks national and state sex offender registries and will deny persons subject to lifetime registration. HOC will review, on a case by case basis, the issues related to any applicant who is registered as a sex offender for other than their lifetime.

Section (b):

The following section highlights revisions made to HOC's plan elements.

HCV Administrative Plan Updates:

The following updates have been made since the FY 2023 Annual PHA Plan submission:

Chapter Two: Eligibility for Admission

- Updated admission and verification standards for Live-In Aides.
- Added definition of able-bodied household member.

Chapter Four: Establishing and Maintaining the Waitlist

- Updated first preference, to include forced displacement of families resulting from a fire, flood damage, and natural disaster.

Chapter Seven: Verification Procedures

- This chapter details the verification process used to determine program eligibility, including the verification of income. The Commission approved updates to the language that reads self-employed individuals must certify that, if the business is not based in Montgomery County, a

minimum of 51% of their business is conducted in Montgomery County to meet the local employment preference. Applicants must also provide documentation.

Chapter Eight: Voucher Issuance and Briefings

- This chapter details the voucher issuance process. Vouchers are initially valid for a period of 90 days. The commission approved updated language to grant voucher extensions to all customers for a maximum search time of 180 days. The previous policy applied only to disabled customers for a maximum of 150 days. In order to receive the extension, the customer must request it prior to the expiration of the existing voucher and provide a search record with a minimum of 10 entries. A family may submit a request for reasonable accommodation if additional search time is needed in excess of 180 days.

Chapter Ten: Housing Quality Standards (“HQS”) and Inspections

- The CARES Act of 2020 provided HUD with broad authority to waive statutes and regulations for the HCV program. HUD published PIH Notice 2020-31 (Remote Video Inspections for Housing Choice Voucher Program) on December 31, 2021. The notice incorporates the use of “virtual” Remote Video Inspections (“RVI”) as an alternate HQS inspection method. Adopting this waiver provided HOC the flexibility to continue to serve our most vulnerable customers while reducing the risk of exposure to the Coronavirus from third party vendors and HOC staff. Implementing this waiver is also critical to our business operations in the event of another pandemic, epidemic, or major natural disaster. Customers will have the option for in-person inspections as well. Updates include the following:
 - Addition of a Remote Video Inspection (Virtual Inspection) section.
 - Choosing a proxy
 - Incorporating RVI
 - Administrative preparation
 - Pre-inspection planning
 - Equipment needs
 - Scheduling
 - Utilization of PHA Provided Software (YARDI)
 - Interior/exterior inspections
 - Post inspection

Chapter 11: Owner Rents, Rent Reasonableness, and Payment Standards

- Pursuant to PIH Notice 99-35, HUD merged Section 8 Certificates and the Housing Choice Voucher program, allowing for a new way to calculate the Housing Assistance Payment. The merger has since concluded, making all pre-merger language obsolete. This language was removed.
- Language regarding Payment Standards was also adjusted to include the Electronic Funds Transfer (“EFT”) process. Wording referencing paper checks was removed.

Chapter 21: Housing Choice Voucher Homeownership Option

- This chapter details the HCV Homeownership Program. The program is limited to twenty-five (25) participants, of which, three slots are designated for disabled families. The homeownership program is collaborative effort between HOC's Housing Resources and Mortgage Finance Divisions. Montgomery County uses the annual Area Median Income ("AMI") to determine the minimum income requirement for participation in the homeownership program. The current requirement has increased from \$24,000 to \$40,000.

Housing Choice Voucher Payment Standards:

Pursuant to PIH Notice 2022-30 (Extension of Certain Regulatory Waivers for the Housing Choice Voucher Program and Streamlined Review Process), HOC requested the waivers listed below. The CARES Act provided HUD with the authority to waive statutes and regulations for the Housing Choice Voucher and Public Housing Programs. The waivers provided PHAs with the flexibility to adjust program practices where necessary in order to prioritize mission critical functions. Most CARES Act waivers contained in PIH Notice 2021-14 (published May 5, 2021) expired on December 31, 2021. Subsequent PIH Notices, through PIH Notice 2022-30, provide a streamlined process for PHAs to provide continued flexibility to respond to the pandemic, especially fluctuating rental markets.

1. Voucher Tenancy (New Payment Standard Amount: PHAs may establish payment standards from 111%-120% of the applicable Fair Market Rent ("**FMR**").

The Housing Resources Division's ("**HRD**") recommendation to increase the Voucher Payment Standards to 112% of the published Small Area Fair Market Rents ("**SAFMR**") was based on an analysis of HOC's current voucher portfolio. HRD found that this increase would reduce rent burden for 856 families, or 80% of currently rent-burdened households. The increase also allowed greater access to high-opportunity areas while increasing program utilization and maintaining a recommended reserve balance of 4%-6% of our Annual Budget Authority. HOC analyzed a total of 71 zip codes and five (5) bedroom sizes to determine the most beneficial payment standard values. Staff examined various outcomes and selected the solution that allowed for the fewest number of families to be rent-burdened.

On December 14, 2022, HUD granted approval for HOC to increase its payment standards above 110%. HOC intends to increase the HCV program VPS to 112% of the FMR for all bedroom sizes in all zip codes. The increased payment standards are applicable to all New Admissions and at the next re-examination for existing customers.

Family Self Sufficiency Action Plan:

The Family Self Sufficiency ("**FSS**") program is a federally mandated program authorized by the Cranston-Gonzalez Affordable Housing Act of 1990. HOC's FSS program began in February of 1993, subsequent to HUD's approval of the initial FSS Action Plan.

Public Housing Authorities work in collaboration with public and private resources to provide supportive

services, case management, and an escrow account to participating families, in order to help families achieve economic independence and self-sufficiency. The FSS program is a voluntary program offered to all families participating in the HCV program, including the following programs:

- Family Unification Program;
- Project Based Voucher;
- Emergency Housing Voucher;
- Non-Elderly Disabled and Mainstream Disabled;
- Veterans Affairs Supportive Housing;
- HCV Homeownership;
- Single Room Occupancy; and
- Moderate Rehabilitation Program

HUD published the Streamlining and Implementation of Economic Growth, Regulatory Relief and Consumer Protection Action Changes to Family Self-Sufficiency Program Final Rule on May 17, 2022, effective June 16, 2022. The final rule mandates numerous changes to the FSS program that must have been implemented no later than November 14, 2022. The changes required HOC to update the FSS Action Plan, which describes the policies and procedures used to operate the FSS program by September 30, 2022 (45 days prior to the compliance date). HOC received HUD's approval on September 26, 2022.

Regulatory changes to the FSS Program include:

1. Obtaining employment and being free of welfare assistance at the time of graduation;
2. Updating the mandatory size of a Public Housing Authority's required FSS Program;
3. Allowing family members other than the Head of Household to execute the FSS Contract of Participation ("CoP");
4. Changing the term of the CoP;
5. Amending the management of the escrow account, including forfeiture of the escrow funds; and
6. Making changes to portability provisions.

The Final Rule also allows PBRA owners to administer FSS Programs. The requirements listed above are documented in HOC's updated FSS Action Plan.

The FSS Action Plan provides details about operations, program participants, supportive services, as well as the agency's strategy to help low-income families increase their earned income and eliminate their need for welfare assistance. The FSS Action Plan must also address the implementation of discretionary policies. HOC implemented policies and procedures considered to be safe harbor or best practices.

HOC incorporated the following discretionary policies:

- **Chapter One: FSS Introduction**
 - HOC will review and update the action plan at least once per year to reflect regulatory

and operational challenges.

- **Chapter Two: Purpose, Scope, and Applicability of the FSS Program**
 - HOC will maintain its Mandatory Minimum Program Size (“**MMPS**”) of 441 families. HOC can reduce the program size by one for each family member that graduates from the program. Additionally, HOC can choose to operate an FSS program of a larger size than its MMPS.
 - HOC will not enter into a cooperative Agreement with multifamily owners to voluntarily make its FSS program available to those residents (Section 8 PBRA program).

- **Chapter Three: Program Administration**
 - HOC will utilize a combination of HCV Administrative Fees and grant funds from Montgomery County Government to pay for FSS salaries not covered in the FSS grant.
 - HOC will not use unrestricted Net Position funds to pay for supportive services. HOC will use forfeited escrow account funds and refer FSS families to partnering agencies for supportive services.
 - HOC will use forfeited escrow account payments for FSS participants in good standing, as requested, to complete an interim goal or task in the Individual Training and Service Plan (“**ITSP**”).
 - HOC will prioritize funds from the forfeited escrow accounts on a first come first served basis, based on the date/time of the request.
 - HOC will seek assistance from the RAB in identifying potential members to serve on the Program Coordinating Committee (“**PCC**”).

- **Chapter Four: Selecting and Serving FSS Families**
 - HOC will offer monthly case management, information and referrals, educational workshops, and priority in homeownership programs and escrow accounts, as incentives to join the FSS program.
 - HOC will conduct outreach efforts in English and Spanish. Upon request, translation in other languages will be made available.
 - HOC will establish a waitlist for the FSS program when enrollment exceeds 400 participants. Applicants will be selected for program participation in the order of the date/time of the application submission.
 - HOC will conduct motivational screening for interest in the FSS program. The screening will simply require the family’s attendance of an orientation/workshop.
 - HOC will deny program participation if the family owes a debt to the PHA. Families who have entered into a repayment agreement and are current in the repayment terms will not be denied participation in the FSS program.
 - HOC will allow a family to re-enroll in the FSS Program a second time if they did not successfully complete the obligations of the executed contract CoP.
 - HOC will require each adult member of the household to certify their agreement as to their designated head of the FSS family.

- HOC will conduct an informal needs assessment before executing the CoP. After enrollment, a formal assessment will be completed by a partnering agency.
- **Chapter Five: Contract of Participation**
 - HOC will not terminate the FSS CoP if the family has violated the terms of the lease, if the family has requested an informal hearing and prevailed.
 - HOC will not terminate the CoP if the family fails to meet the contract obligations for good cause.
 - HOC will modify the CoP upon mutual agreement from the FSS Head of Household and FSS Counselor.
 - HOC will continue to offer supportive services to former FSS families, free of charge.
 - The grievance and informal hearing procedures for the FSS program is the same process adopted for the HCV program (Chapter 19 of the HOC HCV Administrative Plan).
- **Chapter Six: Escrow Account**
 - HOC will disburse interim payouts from the escrow account before completion of the CoP when the funds are needed to complete an interim goal or for a one-time payment. The FSS participant must be enrolled in the program for a minimum of 12 months and the amount of the withdrawal is limited to 25% of the accrued escrow.
 - Before disbursing interim and final payouts, HOC will follow HUD’s verification hierarchy to confirm that the FSS family has completed interim goals, the CoP, or is no longer a recipient of welfare assistance.
 - HOC will provide FSS participants with an annual statement of their FSS escrow balance.
- **Chapter Seven: Portability in Housing Choice Voucher Programs**
 - If the FSS family has established residency in Montgomery County for at least 12 months prior to admission to the HCV program, HOC will approve the FSS family’s request to port to another jurisdiction during the first 12 months after the effective date of the CoP.

All other aspects of HOC’s FSS Action Plan adhere to the general rules/regulations of the FSS Program.

Section (C): Deconcentration

HOC’s Public Housing Deconcentration Policy is described in Chapter 10 of the Agency’s Admissions and Continued Occupancy Policy (“ACOP”), which governed HOC’s Public Housing program. Although HOC has converted all of its PH units and tenants through the use of RAD Component One, rendering the ACOP no longer relevant, HOC’s PH Deconcentration policy is referenced below, as requested for this section. More specifically, Sections 10.4 and 10.5 read the following:

10.4 Deconcentration Policy:

It is HOC’s policy to provide for deconcentration of poverty and encourage income mixing by

bringing higher-income families into lower-income developments and lower-income families into higher-income developments. Towards this end, we may skip families on the waitlist to reach other families with a lower or higher income. Additionally, the HOC may use flat rents to encourage higher-income eligible residents to lease or remain in a public housing unit. We will accomplish this in a uniform and non-discriminatory manner.

HOC will affirmatively market its housing to all eligible income groups. Lower-income residents will not be steered toward lower-income developments and higher-income people will not be steered toward higher-income developments.

10.5 Deconcentration Incentives:

Subject to its annual deconcentration analysis, the HOC may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

B2: New Activities

Project Based Vouchers:

HOC currently operates a PBV program within its HCV program. The rules governing HOC's PBV program are enumerated in Chapter 22 of HOC's Administrative Plan for the Housing Choice Voucher Program. As described in HOC's Administrative Plan, the program goals for the PBV Program are as follows.

- a) To contribute to the improvement and long-term viability of the area's housing stock.
- b) To increase the supply of affordable housing and location choice for very low-income households.
- c) To integrate housing and supportive services such as education, case management, job training, and day care to help families and individuals achieve stability and self-reliance.
- d) To promote the coordination and leveraging of resources of public, semi-public, or non-profit agencies with compatible missions.

As previously reported, HOC administered a PBV HAP contract with HOC's Town Center Apartments for sixty-two (62) senior housing apartments. HUD executed the PBV HAP contract on July 1, 2019. HUD awarded HOC tenant protection vouchers for At-Risk Households in Low-Vacancy Areas (Low-Vacancy Vouchers or "LVV") for residents of Town Center Apartments under the Second Component of the RAD program and Section III (A) of Notice PIH 2018-02. Under this program, HOC elected to administer the PBV HAP contract. The property's triggering event was the maturation of its Section 236 mortgage on May 1, 2019.

As part of HOC's ongoing commitment to enhance communities and provide stronger opportunities to customers living at Town Center Apartments, HOC completed the new construction of senior property, Residences on the Lane (formerly referred to as Upton II), in downtown Rockville. Residences on the Lane is the replacement property for the residents of Town Center Apartments and was developed under the Low Income Housing Tax Credit ("LIHTC") program. Ultimately, HOC was not able to transfer the original LVV PBV contract to Residences on the Lane; however, all affected residents were issued tenant-based protection vouchers. Construction at Residences on the Lane was completed in October 2021. All residents have vacated Town Center Apartments and have relocated to their intended destinations.

In FY 2019, HOC's Stewartown Homes underwent a RAD Component Two conversion from Section 236 Rental Assistance Payments ("RAP") to PBV. Nineteen (19) existing RAP subsidies were converted to PBV. In relation to the RAD Component Two conversion, HUD also approved HOC for 37 LVV as project-based tenant protection vouchers for residents without Section 236 RAP subsidy. HOC was required to certify the existing residents for the LVVs and determine eligibility, which is governed by the HCV program regulations. The LVV funding went into effect during October 2019. The 19 PBV and 37 LVVs are now administered under HOC's HCV program. Stewartown Homes is also financed by the LIHTC program. Renovations for this property are complete as of November 2022. All residents have successfully relocated back to the property.

In FY 2020, HOC's Elizabeth House III (The Leggett) completed its conversion of PH through a RAD Component One/Section 18 Blend, as previously reported. This conversion included 26 tenant protection project-based vouchers. These vouchers are now administered under HOC's HCV program. This is HOC's final RAD conversion project and construction has reached substantial completion as of February 2023. HOC will soon begin the process of relocating existing RAD tenants to their new units.

In FY 2020, HOC's Bauer Park senior property underwent a RAD Component Two conversion from Section 236 RAP to PBRA. HOC received a total of 56 PBRA subsidies to replace the existing Section 236 RAP subsidies. In relation to this conversion, HOC was also approved for 65 LVVs as tenant protection vouchers for the Section 236 residents without RAP subsidies. HOC was required to certify the existing residents for the LVVs and determine eligibility, which is governed by the HCV program regulations. The 65 project-based LVVs are now administered under HOC's HCV program. This property is financed in part by Low Income Tax Credits. Renovations are complete as of February 2023.

HOC's Metropolitan located in Bethesda, MD is a LIHTC property, which includes 38 PBV units. HOC plans to renovate all units and common areas at this property through a refinance and LIHTC re-syndication. Renovations will also include upgrades to all systems and water piping. HOC is currently in the process of procuring a general contractor for these renovations and a request for proposal ("RFP") was issued December 21, 2022.

In accordance with the Code of Federal Regulations ("CFR") at 24 CFR 983.6 and HOC's Administrative Plan, the maximum amount of PBV assistance that HOC may provide is up to 20 percent of the HCV program baseline (currently 7,702). HOC currently has 870 PBV units located throughout Montgomery

County, Maryland, including Silver Spring, Aspen Hill, Bethesda, Montgomery Village, Gaithersburg, Rockville, Germantown, Chevy Chase, Wheaton, Takoma Park, Clarksburg, and Boyds.

HOC has not and does not currently have any additional Project Based Voucher activity.

B3: Progress Report

HOC continues to make positive strides toward meeting the mission and goals described in its FY 2020 – 2024 Five-Year Plan. Below are some highlights of HOC’s efforts over this past year:

- **Real Estate Development Team:** Development of affordable housing.
 - Presently, HOC has in design, predevelopment, and under construction/renovation thirteen (13) developments throughout Montgomery County totaling approximately 3,270 units, with 1,812 units designated as affordable, for an aggregate total of nearly \$895 million in construction dollar value. HOC also has more than 2,000 additional units of renovation and new construction that will target a high level of sustainability at varying Area Median Income (“**AMI**”) levels that are slated to enter the pipeline shortly. Within the past year, HOC closed on the acquisition of 625 naturally occurring affordable housing units inside the Bethesda Central Business District (“**CBD**”).
 - Below is an outline of recent, current, and future projects.

Recently Completed:

- **Brooke Park (Bethesda):** Renovations were completed in September 2021. This property was renovated using HOME and Montgomery County Housing Initiative Funds (“**HIF**”) funds.
 - 17 Total Units:
 - HOME/HIF: 17
- **Upton II (Rockville) (Residences on the Lane):** New construction was completed in October 2021. This was the replacement property for the Section 236 Town Center Apartments.
 - 150 units:
 - LIHTC: 135
 - PBRA: 22
- **Stewartown Homes (Gaithersburg):** Renovations were completed in December 2022 through a LIHTC re-syndication.
 - 94 Townhouse Units:
 - LIHTC: 38

- PBV: 56
- **Bauer Park (Rockville):** Renovations at this senior property are completed as of February 2023. This property was a Section 236 RAD Component Two conversion, which also leveraged LIHTC.
 - 141 Total Units:
 - LIHTC: 141
 - PBRA: 56
 - PBV: 55

Current Projects:

- **Elizabeth House III (Silver Spring) (The Leggett):** New construction for this senior property has reached substantial completion as of February 2023. This property was the replacement property for the original Elizabeth House PH RAD Component One conversion.
 - 267 Total Units:
 - LIHTC (Income Averaging): 238
 - 106 units at 30%
 - PBRA: 80
 - PBV: 26
 - 14 units 60%
 - 118 units at 80%
- **West Side Shady Grove (Derwood) (The Laureate):** New construction is scheduled for completion in March 2023.
 - 268 Units:
 - MPDU: 67
 - HOC Workforce: 12
- **Georgian Court (Silver Spring):** Renovations are scheduled for completion in December 2023. This was an existing property in HOC's portfolio, which was renovated as part of a LIHTC re-syndication.
 - 147 Units
 - LIHTC: 147
 - PBRA: 29
 - HIF: 59
- **Shady Grove (Derwood):** Renovations are scheduled for completion in December 2023. This is an existing property in HOC's portfolio, which was renovated as part of a LIHTC re-syndication.
 - 144 Units:

- LIHTC: 144
 - PBRA: 144
 - HOME: 4
- **Willow Manor Properties (Fair Hill Farm, Colseville, Clopper’s Mill):** Renovations are scheduled for completion in June 2024. This property is part of a LIHTC re-syndication that lumped all three properties into one LIHTC entity, which is 100% LIHTC.
 - 266 units over three separate properties:
 - **Manor at Fair Hill Farm (Olney):** 101 Units (renovations completed December 2022)
 - **Manor at Clopper’s Mill (Germantown):** 82 Units (renovations started December 2022)
 - **Manor at Colesville (Silver Spring):** 83 Units (renovations to begin August 2023)

Future Projects:

- **Hillandale Gateway:** New construction is scheduled to start in December 2023. There will be two separate LIHTC projects.
 - 463 Total Units:
 - Multifamily: 308 Units
 - 93 LIHTC
 - Elderly: 155 Units
 - 155 LIHTC
- **Garnkirk Farms:** New construction is scheduled to start in December 2023. This property will be financed by LIHTC.
 - 184 Total Units
- **Metropolitan:** This property is slated for renovations starting during January 2024 as part of a LIHTC re-syndication.
 - 308 Total Units
 - LIHTC: 92
 - PBV: 38
- **Housing Resources Division (“HRD”):** Operation of HOC’s HCV program.
 - HRD oversees two Customer Service Centers (Down-County, Silver Spring, and Up-County, Gaithersburg). The centers were closed to the public beginning in March 2020, in response to the COVID-19 pandemic, but reopened January 9, 2023. Throughout this time

- period, HRD adapted its operations in order to operate efficiently and provide the same level of services as pre-COVID-19. This included teleworking, electronic certifications, limited in-office hours for critical staff, remote customer voucher issuance and relocation briefings, remote landlord informational briefings, and remote informal hearings. These modifications continued successfully throughout the pandemic.
- Since reopening to the public, HRD staff have returned to pre-COVID-19 operations; however, some practices adopted during the pandemic will remain in effect.
 - HOC began using Ecco Mail to receive incoming correspondence electronically. This allows HRD staff to receive customer documents more timely and efficiently than the traditional mail system.
 - HRD began using Yardi's Rent Café system during July 2022. Rent Café is an on-line portal used to perform re-certifications electronically in lieu of traditional mail. Electronic re-certifications will remain in effect post-pandemic in order to streamline the recertification process.
 - HRD will implement a hybrid voucher briefing format, conducting briefings virtually and in person.
 - HRD has worked assiduously to increase the utilization rate of the Housing Choice Voucher Program and has reached a rate of 96%. HRD anticipates increasing the utilization to 98% by the end of calendar year 2023. HRD continues to monitor the utilization rate monthly and work to maintain and further increase the rate.

Monthly, staff selected an average of 400 applicants from the waitlist to determine program eligibility for the HCV/PBV programs. Overall, HOC selected 4,878 applicants from the waitlist during calendar year 2022. HRD processed 931 New Admissions during the calendar year 2022.

The response rate was extremely low during the pandemic and often certification packets trickled in after the requested return date. The mailing time was also slower than usual. To help remedy this, HRD sent correspondence electronically to the customer email address on the application, and by the U.S. Postal Service. Additionally, staff conducted outreach to applicants with vouchers nearing expiration.

Staff also noted that applicants experienced challenges searching for units during the pandemic and did not search as actively as pre-pandemic. There was a reluctance for applicants to physically view/enter homes during the pandemic, which drastically affected the leasing rates.

However, lower COVID transmission rates have resulted in more active housing searches, resulting in an uptick in the leasing rate.

- **Inspection Services (Housing Resources Division):** Operates HOC’s HCV HQS inspection program.
 - HOC’s Inspection Services team previously phased in the use of virtual inspections for annual and initial inspections in order to continue to ensure safe and appropriate housing for our HCV customers during the COVID-19 pandemic. The team also allowed virtual inspections for our most vulnerable population. This option will remain in effect.
 - HOC’s third party contract inspections company, Inspections Experts, Inc. (“**IEI**”) is required to utilize PHA provided software (“**YARDI**”) to complete inspections and upload inspection results. Virtual inspections, which IEI performs, require a smartphone or tablet. In-person inspections are conducted for all initial inspections, and on an as-needed basis for existing units.

- **Resident Services:** Provide supportive services to all of HOC’s customers.
 - Resident Services continues to provide paramount supportive services to HOC customers, including HCV recipients. As a result of the pandemic, there has been a rise in requests for services from Resident Service staff, who seamlessly adapted their services to support HOC participants through phone, virtual platforms, and limited door-to-door services for extenuating circumstances (crises and lack of access to virtual platforms). Since the reopening of HOC’s offices to the public, Resident Services Staff has reverted to seeing residents and operating programs in-person. They continue to offer general services, including need-based workforce assessments, wellness checks, information, and referrals. They also provide HOC’s participants who have specific needs with food assistance and other essentials. During the pandemic, children and youth faced unexpected closure of schools, childcare centers, and many of the community spaces that children and families typically utilize. These closures limited access to support networks and help from adults outside the home. These places/spaces have since reopened to the public and are operating on pre-pandemic schedules.

 - HOC’s Resident Services Division continues to provide education programs for youth; workforce, health and wellness programs for adults; and support for our elderly population through the use of virtual platforms and in-person services.

 - **Fatherhood Initiative Program:**

HOC’s Fatherhood Initiative Program strengthens families by strengthening fathers. HOC is proud to administer the Fatherhood Initiative Program. Since 2015, HOC has worked with more than 1,000 fathers and received national recognition for its success with the program. In 2020, HOC received its second cycle (five years) of grant funding from the

U.S. Department of Health and Human Services to continue its work in strengthening fathers and families through the program.

During the pandemic, the Fatherhood Initiative Program successfully conducted the program virtually with curriculum from the National Fatherhood Program, financial literacy, workforce development, and health courses sponsored by community partners. HOC staff work with fathers to help strengthen their parenting skills, prepare them for new career opportunities, and connect them to community resources incentives, and peer support.

By participating in the Fatherhood Initiative Program, participants have access to:

- Case management services;
- Community resources; and
- Incentives for reaching program milestones, and more.

HOC's success is dependent on our partnerships throughout the community, including participant referral partners. Our current partners who are leading experts in fatherhood education include, Montgomery College, Fathers and Children Together, PNC Bank, African American Health Program, the National Fatherhood Initiative, and other nonprofits, agencies, and private partnerships. Partners have the opportunity to collaborate with HOC in this innovative program by:

- Collaborating with HOC in participant-recruitment efforts;
 - Partnering in community events held for participants and families;
 - Participating in panels at Fatherhood Initiative Program workshops and events; and
 - Sharing client referrals and resource connections.
- HOC has continued to work with staff, other local agencies, and outside partners to enhance its fair housing efforts.

Violence Against Women Act ("VAWA") Goals:

To help meet the goals of VAWA, HOC provides support and referrals to counseling for victims of domestic violence, dating violence, sexual assault, or stalking. HOC's partner, the Montgomery County Department of Health and Human Services, features an Abused Persons Program (240-777-4673), which provides 24-hour services, including access to counseling and shelters. HOC has an Agency-wide VAWA Policy, which clearly defines and describes HOC's efforts to ensure that VAWA victims retain their housing assistance. HOC also assists victims with referrals to obtain restraining orders.

On November 16, 2016, the HUD published a new Final Rule implementing the housing protections authorized in the Violence Against Women Reauthorization Act of 2013 ("VAWA 2013" or "2013 Act").

Despite the VAWA 2013 Final Rule's identification that a formal PHA policy is not required in order to implement the provisions of VAWA 2013, HOC's Commission chose to develop a single, stand-alone VAWA policy, which describes HOC's commitment to VAWA adherence and enforcement.

HOC's new VAWA Policy has the following principal goals and objectives:

- A. Maintaining compliance with all applicable legal requirements imposed by VAWA;
- B. Ensuring the physical safety of victims of actual or threatened domestic violence, dating violence, sexual assault, or stalking who are assisted by HOC;
- C. Providing and maintaining housing opportunities for victims of domestic violence, dating violence, sexual assault, or stalking;
- D. Creating and maintaining collaborative arrangements between HOC, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence, sexual assault, or stalking, who are assisted by HOC; and
- E. Taking appropriate actions in response to an incident or incidents of domestic violence, dating violence, sexual assault, or stalking, affecting individuals who HOC assists.

Additionally, HOC's VAWA Policy states the Agency's commitment to cooperate with organizations and entities, both private and governmental, which provide shelter and/or services to victims of domestic violence. If HOC's staff becomes aware that an HOC assisted individual is a victim of domestic violence, dating violence, sexual assault, or stalking, HOC will refer the victim to such providers of shelter or services as appropriate. While HOC's VAWA Policy does not create any legal obligation that requires HOC either to maintain a relationship with any particular provider of shelter or services to victims of domestic violence, dating violence, sexual assault, or stalking or to make a referral in any particular case, HOC's Emergency Transfer Plan does describe providers of shelter or other services to victims of domestic violence, dating violence, sexual assault, or stalking with which HOC has referral or other cooperative relationships.

Lastly, HOC's VAWA Policy incorporates and explains the Agency's use of the following four HUD documents required as per the VAWA 2013 Final Rule:

- 1. Notice of Occupancy Rights under the Violence Against Women Act;
- 2. Model Emergency Transfer Plan for Victims of Domestic Violence;
- 3. Certification of Domestic Violence; and
- 4. Emergency Transfer Request for Victims of Domestic Violence.

B4: Capital Improvements

Please reference HUD form 50075.2 approved by HUD on 10/30/2020. The Capital Fund Program Five-Year Action Plan describes the capital improvements necessary to ensure the long-term physical and social viability of HOC's Public Housing Projects.

B5: Most Recent Fiscal Year Audit

There were six findings identified during HOC's FY 2022 agency audit. Below are the findings, recommendations, and corrective actions for each finding.

1. **Finding 2022-001: Housing Voucher Cluster-HCVP Eligibility**
 - a. Context: Testing of 40 HCVP tenant files for eligibility standards revealed one file where the tenant received an allowance without proper verification or support.
 - b. Recommendation: The Commission should implement processes to ensure that all proper documentation is maintained during the recertification process for every tenant.
 - c. HOC Action:
 - i. The Housing Resources Division will hire an internal trainer to address systemic errors, reinforce program rules, and introduce new regulatory requirements. The trainer will meet with staff monthly to reinforce program requirements and provide individual coaching as needed. Moreover, HOC will continue to archive recorded trainings in a resource library so the materials are accessible to staff at all times.
 - ii. The HOC Compliance team will conduct quality control reviews of completed files. Staff from the Housing Resources Management Team will meet with the HOC Compliance Team following each review period to discuss systemic findings and schedule staff trainings in areas requiring improvement.
 - iii. HOC will procure a professional consulting company to provide a comprehensive refresher training on the HCV eligibility requirements.
 - iv. The Housing Resources Management Team will continue to meet with staff regularly to provide staff development trainings, including reiteration of the Quality Control Checklist, the HUD verification hierarchy, and uploading all documents into AODocs, HOC's electronic filing system.
2. **Finding 2022-002: Housing Voucher Cluster-HCVP Rent Reasonableness Test**
 - a. Context: Testing of 40 HCVP tenant files for rent reasonableness standards revealed one file that was missing the rent reasonableness comparison report to substantiate the contract rent and one file that was missing the lease amendment letter effective for the sampled contract rent change.
 - b. Recommendation: The Commission should implement processes to ensure that all proper documentation is maintained during the rent approval process for every tenant.
 - c. HOC Action:
 - i. HOC will continue to work with the software developer to identify and resolve software glitches.

- ii. The HOC Compliance team will conduct quality control reviews of completed files. Staff from the Housing Resources Management Team will meet with the HOC Compliance Team following each review period to discuss systemic findings and schedule staff trainings in areas requiring improvement.
 - iii. HOC implemented Rent Café, Yardi's software module to process electronic re-certifications. The lease amendment letter is automatically uploaded into Yardi when a customer completes the recertification online.
3. **Finding 2022-003:** Housing Voucher Cluster-HCVP Housing Quality Standards and Enforcement
- a. Context: Testing of 40 HCVP tenant files for failed inspection standards revealed three files where abatement ought to have been implemented, but records could not be located. Also identified, were three files where the inspection was not completed annually or within HUD's granted extension for COVID-19.
 - b. Recommendation: The Commission should implement processes to ensure that all proper documentation is maintained for inspections of tenant residences.
 - c. HOC Action:
 - i. HOC procured Inspection Experts Inc. ("IEI") on July 1, 2022, to conduct all initial, annual, and special and quality control inspections.
 - ii. HOC meets with IEI monthly to provide the report of annual inspections, and discuss progress and the alignment of expectations.
 - iii. HOC staff receives a report of units requiring abatement daily from IEI and immediately place the units in abatement.
 - iv. An HOC Senior Manager reviews the abatement report weekly to conduct quality control reviews of all records, ensuring that all units are placed in abatement.
 - v. The HOC Compliance Team will conduct quality control reviews of completed files. Staff from the Housing Resources Management Team will meet with the HOC Compliance Team following each review period to discuss systemic findings and schedule staff trainings in areas requiring improvement.
4. **Finding 2022-004:** Section 8 Project Based Cluster-PBRA/MOD Eligibility
- a. Context: Testing of 40 tenant files for eligibility standards revealed that 34 files had the following exceptions:
 - i. Nine files were missing documentation needed to support and recalculate total income per the HUD-50059.
 - ii. Eight (8) files that were missing support needed to substantiate the asset total per HUD-50059.
 - iii. Seven (7) files that were missing support needed to substantiate the expense total per HUD-50059.
 - iv. Twenty-five (25) files were missing documentation supporting that the tenant was selected from the waitlist in accordance with the Commission's Administrative Plan.

- v. Twenty-eight (28) files did not have a certification checklist, or an alternative document, reflecting an HCVP Employee’s signoff on the application or file being completed to document an internal control.
 - b. Recommendation: The Commission should implement processes to ensure that all proper documentation is maintained during the recertification process for every tenant.
 - c. HOC Action:
 - i. HOC procured Quadel Consultants to complete a 100% audit of the PBRA program across all properties.
 - ii. Property Management staff will implement new procedures to ensure that all resident documents are properly maintained. The updated procedures will require that all staff completing the re-certifications utilize a checklist to ensure that all required documents are obtained and that each document is scanned as attachments directly into HOC’s Yardi system.
 - iii. Managers will perform quality control reviews to ensure that procedures are followed and that documents are scanned into the system for all re-certifications completed.
 - iv. The Regional Manager will review reports monthly to enable confirmation of scanned documents for proper file maintenance.
 - v. The HOC Compliance Team will conduct quality control reviews of completed files. Staff from the Property Management Team will meet with the HOC Compliance Team following each review period to discuss systemic findings and schedule staff trainings in areas requiring improvement.
 - vi. The HOC Compliance Team offered a refresher Housing Path Waitlist training to existing staff and perform monthly quality control reviews to ensure that procedures are followed.
 - vii. HOC procured a professional consulting company to provide a comprehensive refresher training on the Project Based Rental Assistance eligibility requirements.
5. **Finding 2022-005:** Section 8 Project Based Cluster-PBRA/MOD Housing Quality Standards
- a. Context: Testing of 40 HCVP tenant files for annual inspection standards revealed 22 files that did not have an annual inspection completed during or subsequent to the fiscal year and 15 files that did not have an annual inspection that was completed within the 12-month fiscal period.
 - b. Recommendation: The Commission should implement processes to ensure that all proper documentation is being maintained for inspections of tenant residences.
 - c. HOC Action:
 - i. Property Management staff will be retrained on the unit inspection requirements to ensure that all inspections are documented and that the completed executed signed inspection forms are scanned into the resident’s record in HOC’s Yardi system.

- ii. Managers will review these actions and provide greater oversight to ensure that move-in and move-out inspections are performed for every unit upon lease signing and when residents vacate a unit.
- iii. The Property Management and Maintenance Divisions will develop an annual inspection schedule.
- iv. The HOC Compliance Team will review inspections as part of the quality control review.

6. **Finding 2022-006:** Section 8 Project Based Cluster-PBRA/MOD Tenant Utility Allowances

- a. Context: Testing of 40 tenant files for eligibility standards revealed that one recertification displayed a tenant utility allowance that did not match the value listed in HUD form-52667 effective for the period test.
- b. Recommendation: The Commission should review the procedures taken by Section 8 Cluster employees to ensure that they correctly add utility allowance values from HUD Form-52667 to newly processed certifications. All section 8 Cluster employees should be trained on any changes made to those procedures.
- c. Action Taken:
 - i. HRD will hire an internal trainer to address systemic errors, reinforce program rules, and introduce new regulatory requirements. The trainer will meet with staff monthly to reinforce program requirements and provide individual coaching as needed. Moreover, HOC will continue to archive recorded trainings in a resource library so the materials are accessible to staff at all times.
 - ii. The HOC Compliance Team will conduct quality control reviews of completed files. Staff from the Property Management team will meet with the HOC Compliance Team following each review period to discuss systemic findings and schedule staff trainings in areas requiring improvement.
 - iii. HOC will procure a professional consulting company to provide a comprehensive refresher training on the HCV eligibility requirements.

C1: Resident Advisory Board (“RAB”) Comments

The RAB is scheduled to review the FY 2024 Annual PHA Plan and provide any comments. HOC staff will address any comments provided.

C2: Certification by State or Local Officials

The Montgomery County Division of Finance and Administration has reviewed the most recent five-year plan and proposed FY 2024 Annual PHA Plan and has executed this form.

C3: Civil Rights Certification/Certification Listing Policies and Programs that the PHA has revised since Submission to its Last Annual Plan

The fully executed form will be included as an attachment to the submission of the FY 2024 Annual PHA Plan once the plan is approved by the Commission

C4: Challenged Elements

The public comment period, to commence February 16, 2023, will culminate with a public hearing on April 3, 2023. HOC staff will address any elements challenged during the public comment period.

C5: Troubled PHA

Not applicable.

D1: Affirmatively Furthering Fair Housing (“AFFH”)

HOC has not been required to submit an Assessment of Fair Housing (“AFH”). Please see template for additional notes.