



Exhibit B Plan Elements

B.1-1 Statement of Housing Needs and Strategy for Addressing Housing Needs

Similar to other cities and counties across the Nation, Baltimore County, Maryland requires an increase in its supply of available and affordable housing, particularly for persons and families whose income is at or below 80% of the Area Median Income (“AMI”). The need for quality, affordable housing correlates to income; in other words, the lower a family’s income the more competition they face for housing. The Baltimore County Office of Housing (BCOH) identifies the housing needs of the low-income families who reside in BCOH’s jurisdiction, namely, Baltimore County.

BCOH determines housing needs based on an analysis of BCOH’s waiting lists, information provided by the County of Baltimore, Maryland and demographic data from the United States Census Bureau’s most recent and available American Community Survey where the total population is calculated at approximately 854,535 persons and 350,163 housing units.

While BCOH’s waiting lists for Housing Choice Vouchers demonstrate that most families self-report that their income is at or below 30% AMI, (see breakdown below) BCOH’s strategies to address the housing needs of Baltimore County families include:

1. Maximizing the number of available subsidized units by:
 - a. Employing effective management practices and policies to minimize unleased project-based voucher units and tenant-based voucher availability.
 - b. Achieving utilization rate of 98% lease-up rate or 100% voucher budget authority by establishing effective payment standards, occupancy standards, and manageable practices.
 - c. Applying for additional voucher subsidy and any available special program vouchers or other grant funding to serve more families.
2. Ensuring housing remains affordable by adopting appropriate payment standards and thoroughly reviewing landlord requests for contract rent increases.
3. Creating greater awareness of housing opportunities by publicizing and marketing agency programs and resources. BCOH plans to provide housing information to local social service agencies, advocacy groups, partners, and applicants. BCOH will also publicize housing opportunities through advertisements in local print and broadcast media, as well as detailing these opportunities on the Baltimore County’s website and social media.
4. Partnering with Housing Developers to increase the number of project-based vouchers that are available for new construction and rehabilitated units.
5. Conducting activities to ensure appropriate fair housing practices.
 - a. BCOH will undertake these strategies while keeping in mind and considering all identified needs of applicants and participants when planning for development and new housing communities. This includes, without limitation, analysis and consideration of family size, families with children, and persons with disabilities so that BCOH can

continue to ensure all projects can offer a sufficient number of units, range of sizes and bedroom configurations, and accessibility features.

Baltimore County Office of Housing Waiting List

Housing Choice Voucher Program	7,878
Projected Base Voucher Program:	
Prospect Place	728
Remington	3,059
Tabco Towers	962
Aigburth Vale	778
Dunfield Townhomes	6,282
Lyon Homes I	11,670
Lyon Homes II	10,355
Lyon Home III	1,636

B.1-2 Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

The Final Rule implementing Sections 102, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) delivers important benefits to tenants and reduces administrative burdens for public housing agencies (PHAs), multifamily housing owners (MFH owners), and participating jurisdictions. The highlights of the Final Rule are outlined in B.1-4 below.

B.1-3 Financial Resources

Annual Contributions for Section 8 Tenant-Based Assistance – approximately \$95,000,000

Family Self-Sufficiency Grant – approximately \$524,876.00

B.1-4 Rent Determinations

Highlights of Final Rule Implementing Sections 102 and 104 of HOTMA

The Final Rule implementing Sections 102, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) delivers important benefits to tenants and reduces administrative burdens for public housing agencies (PHAs), multifamily housing owners (MFH owners), and participating jurisdictions. The highlights of the Final Rule are outlined below.

Section 102 of HOTMA made changes to how total tenant income is calculated as well as the deductions used to establish adjusted income. In HUD rental assistance programs, tenant income is used to determine eligibility for assistance and adjusted income is used to determine how much rent a tenant should pay (i.e., how much subsidy they tenant should receive). Most common sources of income from all family members are included in the definition of income, though there are some items that are excluded. Deductions from income are made to arrive at adjusted income.

Calculation of Income:

- Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.
- Higher Threshold for Imputing Asset Income: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.
- Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability from \$400 to \$525.
- Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.
- Inflationary Adjustments: HOTMA will annually publish eight inflation-adjusted items no later than September 1st.
 - The deduction for families with dependents.
 - Eligibility restriction on net family assets
 - Threshold above which imputed returns must be calculated on net family assets.
 - The amount of net assets for which the PHA may accept self-certification by the family.
 - Mandatory deduction for elderly and disabled families.
 - Mandatory deduction for a dependent.
 - Income exclusion for earned income of dependent full-time students.
 - Income exclusion for adoption assistance payments.

Exclusions: The nonrecurring income exclusion replaces the former exclusion for temporary, nonrecurring, and sporadic income (including gifts) but it provides a narrower definition of excluded income in contrast to the former broad exclusion of temporary, nonrecurring, or sporadic income.

- Income that will not be repeated beyond the coming year based on information provided by the tenant.
- Income that has a discrete end date and will not be repeated beyond the coming year during the family's upcoming annual reexamination period will be excluded.
- Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home.
- Veterans' aide and attendant care.
- Distributions of principal from non-revocable trusts, including Special Needs Trust.
- Elimination of the Earned Income Disregard (EID) – EID will not apply to any family who is not eligible for and already participating in the disallowance as of December 31, 2023. The EID allowed eligible families to have a portion of their earned income excluded from annual income for a maximum period of 24 consecutive months.

Although HOTMA eliminates the EID, families who were receiving the EID benefit as of December 31, 2023, may continue to receive the full benefit until the remaining timeframe for an individual's family's EID expires or December 31, 2025).

Section 104 of HOTMA set a new limit on the amount and type of assets that an assisted housing resident can hold and remain eligible for assistance. Prior to this change, there was no limit on assets; instead, income from assets was calculated or imputed and included in tenant income. Under the HOTMA changes, persons with assets above \$100,000 (adjusted annually for inflation) or ownership of a habitable home that they have a right to reside in are ineligible. The law gives owners and PHAs some discretion, including the option not to enforce the asset limit for current residents, to establish exceptions, and to delay evictions or terminations for up to six months.

Net family assets are defined as the net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of investment.

Asset Limits

- Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.
- Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.

- Self-Certification of Assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income

Verifications: HOTMA updated verification of income requirements.

- Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.
- Adults Only Need to Sign Consent Form Once: HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.
- Use of Income Determinations from Other Programs (Safe Harbor): HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations. The PHA may determine a family's annual income, including income from assets, prior to the application of any deductions based on income determinations made within the previous 12-month period, using income determinations from the following types of means-tested federal public assistance programs:
 - The Temporary Assistance for Needy Families block grant (TANF)
 - Medicaid
 - The Supplemental Nutrition Assistance Program (SNAP)
 - The Earned Income Tax Credit (EIC)
 - The Low-Income Housing Tax Credit (LIHTC)
 - The Special Supplemental Nutrition Program for Woman, Infants and Children.
 - Supplemental Security Income
 - Pother programs administered by the Secretary.
- Review of EIV Not Required at Interim Reexamination: HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination only, significantly reducing administrative burden.
- Hardship Relief: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

B.1-6 Informal Review and Hearing Procedures

Information related to the governance of BCOH's Housing Choice Voucher Program can be found in the Administrative ("ADMIN") Plan. This document has been submitted along with this plan and is available for

BCOH has updated its written denial of assistance process for HCV programs in accordance with 24 CFR 960.204(c) and 852.553.

B.2 New Activities

Project-based Vouchers

BCOH continues to consistently search for opportunities to provide families with quality housing, with access to wonderful amenities, through HUD's Project-based Voucher ("PBV") program. Specifically for this Plan year, BCOH expects to increase its PBV authority in and around Baltimore County.

These new PBV opportunities will comply with PBV goals, civil rights requirements, HUD's National Standards for the Physical Inspection of Real Estate ("NSPIRE"), and deconcentration standards. Additional information about how BCOH will meet these goals and standards is found in BCOH's Administrative Plan, submitted along with this Plan.

Additionally, these PBVs are consistent with this Plan because they encourage the new construction and/or extensive rehabilitation in possibly mixed-use communities throughout Baltimore County.

B.3 Progress Report

Section	Page	Current Language	Proposed Language
	8	none	ADD: Chapter related to Fair housing and Equal Opportunity.
	16	none	Add: Preference for families who PBV-in place
Maintaining the Waitlist	17	The waitlist will remain open for acceptance of applications until a determination is made by the Executive Director to close the waitlist and at such time a notice will be posted in the legal section on the local newspapers.	<p>BCOH is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, BCOH may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.</p> <p>BCOH's waiting list for the Housing Choice Voucher Program (formerly known as Section 8) will remain closed when BCOH determines that the number of applicants remaining on the list is sufficient to provide all the applicants needed for the next 12 months. The number needed will be based on the number of vouchers available or expected to become available over the next twelve months, the experience of BCOH regarding the number of applicants who are expected to successfully complete the process of establishing their eligibility, and the success rate or the number of eligible applicants who are expected to successfully lease units under the Section 8 program.</p>
Special Admissions	19	None	<p>Add: In an effort to address the crisis of homelessness within Baltimore County while preserving vouchers for other families, individuals with disabilities and elderly families, BCOH will devote 25% of turnover vouchers to households that meet the HUD definition of homelessness. BCOH will partner with the Continuum of Care (CoC) by creating a Memorandum of Understanding (MOU). Eligible families must be referred from the CoC through the Coordinated Entry system.</p>

Denial of Assistance	20	A family that does not meet eligibility criteria discussed within this Administrative Plan, must be denied assistance. In this section we will discuss other situations and circumstances in which denial of assistance is mandatory, and those in which denial of assistance is optional.	Add: A complete section related to the denial of assistance
	24	none	Add: BCOH will not assign monetary values to non-monetary in-kind donations received to calculate annual income. Therefore, BCOH will not conduct zero income reviews for zero income families. Instead, BCOH will monitor zero income families in EIV to identify increases in income.
annual Income excludes	26	The Earned Income Disregard (EID) will not apply to any family who is not eligible for and already participating in the disallowance as of December 31, 2023	Remove the entire sentence
Methods of Verifying Necessary Information	32		Add: HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires BCOH to use the most reliable form of verification that is available and to document the reasons when BCOH uses a lesser form of verification.
Briefings of families and issuance of vouchers	35	"Once issued, a family is given 90 days to locate suitable housing in the locale of its choice. One additional 30-day extension can be given upon the family's request."- Change to 120 days up front with extension only through reasonable accommodation.	Revise: Once issued, a family is given 120 days to locate suitable housing in the locale of its choice. An extension beyond 120 days will be considered as a reasonable accommodation request. The following section completely removed references voucher extensions that are not applicable.
HQS/NSPIRE	36	and incorporates the County's Livability Code (Title 5 Article 35 of the County code) as variations to acceptability criteria [24 CFR 982.401 (a) (4)]. A copy of the Livability Code is attached as Exhibit 1. Inclusion of the Livability Code does not limit housing choice or conflict with HUD's housing quality standards. "	Remove
HQS/NSPIRE	36	"At the same effective date of NSPIRE Baltimore County Livability Code will no longer be in effect for inspections by the Baltimore Office of Housing. "	Remove

HQS/NSPIRE	36	"A Request of Inspection form will be included in their annual recertification packet."	Remove
HQS/NSPIRE	38	"Severe weather-related items: Where items on the exterior are noted and repairs cannot be made due to severe weather conditions, up to a 120-day extension may be granted by the PHA, as long as any hazardous condition is relieved. For example, where paint is peeling on the exterior and it is during a severe weather-related period, the owner will be required to scrape off the peeling paint and the repainting requirement (which is not required by HUD) may be delayed up to 120 days."	Remove
Reinspection fees	40	An owner notifies Baltimore County Office of Housing a deficiency cited in a previous inspection/re-inspection has been repaired or the allotted time for repairs has elapsed, and in either case the previously cited deficiency has not been corrected. Baltimore County Office of Housing may require the owner to pay a re-inspection fee prior to conducting a second inspection/re-inspection.	<p>For a unit not currently under HAP contract and where an inspection has been scheduled, the Baltimore County Office of Housing will charge a re-inspection fee if the unit is determined to not be ready for inspection.</p> <p>For a unit that has been placed into abatement, a reinspection fee will be assessed to the landlord after the second inspection request.</p> <p>Reinspection fees will be assessed as follows: A reinspection fee of \$150 will be charged to schedule a second reinspection for previously documented deficiencies If the unit does not pass the final reinspection the RFTA will be canceled.</p>
	42	Separate Agreements	<p>Remove: Owners and tenants may execute agreements for services, appliances (other than for range and refrigerator) and other items outside those which are provided under the lease if the agreement is in writing and approved by Baltimore County Office of Housing.</p> <p>In order for there to be a separate agreement, the tenant must have the option of not utilizing the service, appliance or other item.</p> <p>Baltimore County Office of Housing is not liable for unpaid charges for items covered by separate agreements and nonpayment of</p>

			these agreements cannot be cause for eviction
Throughout the Admin Plan		Change all instances of "10 business days" to provide verification	Change all instances on for both Intake and Annuals from 10 business days to 15 business days
Contract Rent Increase	47	<p>The Lease may provide for increase in such monthly rent after the first year of the term, if the Owner gives at least sixty days written notice to the Family and the family agrees to the increase in rent. The family portion of the rent must remain affordable and feasible.</p> <p>Owners may not request rent increases prior to the expiration of the first term of lease. As of the first anniversary date of the lease, rent increases may be effective with a 60-day notice to the family and a copy to Baltimore County Office of Housing. An annual rent increase cannot exceed 7% of the current contract rent.</p>	<p>Revise: The Lease may provide for increase in such monthly rent after the first year of the term, if the Owner gives at least ninety (90) days written notice to the Family and the family agrees to the increase in rent. The family portion of the rent must remain affordable and feasible.</p> <p>Owners may not request rent increases prior to the expiration of the first term of lease. As of the first anniversary date of the lease, rent increases may be effective with a 90-day notice to the family and a copy to Baltimore County Office of Housing. An annual contract rent increase cannot exceed 7% of the current contract rent.</p>
	46	A written response will be forwarded to the landlord within 15 calendar days of receipt of the receipt of the request indicating whether it is approved or denied. If approved, the landlord will notify the family of the rent increase amount with a 60 days' notice to the family.	Revise: A written response will be forwarded to the landlord and the tenant within 15 business days of receipt of the request indicating whether it is approved or denied. If approved, BCOH will notify the landlord and the tenant of the rent increase change total tenant payment amount via mail, email or portal with at least a 30-day notice.

Housing Mobility	58	None	<p>Add: BCOH's Housing Mobility Program is a voluntary initiative designed to enable Housing Choice Voucher families to access a wide range of housing options and to better gain access and maintain residency within opportunity areas.</p> <p>Participants enrolled in the program receive:</p> <ul style="list-style-type: none"> • Counseling to develop a service plan tailored to their household needs. • Direct assistance throughout the leasing process • post-move support. • Access to workshops focused on budgeting, understanding leases, and moving tips. <p>The program's primary goal is to assist families to transition to neighborhoods with higher opportunity. BCOH's Housing Mobility Program aims to promote long-term stability and economic mobility by addressing barriers to accessing high-opportunity neighborhoods through a seven (7) step process:</p> <ol style="list-style-type: none"> 1. Recruitment and Enrollment 2. Pre-Move Appointment 3. Family Preparation 4. Owner Outreach, Searching and Applications 5. Leasing-up 6. Post move check-ins 7. Completed search and Follow-up
Security Deposits	60	"Any Security Deposit provided by the Baltimore County of Housing must be returned to the Baltimore County Office of Housing within forty-five (45) days of the family move-out and within the terms of the Security Deposit Agreement."	Add: "Any Security Deposit provided by the Baltimore County of Housing prior to 2013 must be returned to the Baltimore County Office of Housing within forty-five (45) days of the family move-out and within the terms of the Security Deposit Agreement."
Repayment Agreements	60	If it is determined that a family money to Baltimore County Office of Housing (or another PHA), as a condition of continued assistance, a Promissory Note in the form of a Repayment Agreement may be executed by the family with the Baltimore County Office of Housing	Revise: The entire section has been revised to include a comprehensive process related to repayment of debts by the owner and family, repayment agreement requirements, down payment requirements, payment thresholds, execution of the agreement, due dates, late and missed payment and notice requirements.

Special Requirements for Children with elevated blood lead level	41	None	<p>ADD: Upon notification by a public health department or other medical health care provider that a child of less than 6 years of age living in a tenant-based rental assistance dwelling unit has been identified as having an elevated blood lead blood level, BCOH shall complete an environmental investigation of the dwelling unit and of common areas within 15 calendar days. The environmental investigation must be completed in accordance with program requirements, and the result of the environmental investigation must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must also be provided to the owner. If the child identified as having an elevated blood lead level is no longer living in the unit when BCOH receives notification from the public health department or other medical health care provider, but another household receiving tenant-based rental assistance is living in the unit or is planning to live there, these requirements will apply just as they do if the identified child still lives in the unit.</p>
Shared Housing	67	None	<p>Add: Shared housing is a single housing unit occupied by an assisted family and another resident or residents. The shared unit consists of both common space for use by the occupants of the unit and separate private space for each assisted family</p>
Protection of in-place families	70	None	<p>Add: (1) To minimize displacement of in-place families, if an in-place family is determined to be eligible prior to placement of the family's unit on the HAP contract, the in-place family must be placed on the PBV waiting list (if the family is not already on the list) and given an absolute selection preference. If the PHA's waiting list for PBV assistance is not a project-specific waiting list, the PHA must refer the family to the applicable project owner for an appropriate-size PBV unit in the specific project.</p> <p>(2) If the in-place family is a tenant-based voucher participant, program eligibility is not re-determined.</p>

			<p>However, the PHA must determine that the total tenant payment for the family is less than the gross rent for the unit, such that the unit will be eligible for a monthly HAP, and the PHA may deny or terminate assistance for the grounds specified in 24 CFR 982.552 and 982.553.</p> <p>(i) During the initial term of the lease under the tenant-based tenancy, an in-place tenant-based voucher family may agree, but is not required, to mutually terminate the lease with the owner and enter into a lease and tenancy under the PBV program. If the family chooses to continue the tenant-based assisted tenancy, the unit may not be added to the PBV HAP contract. The owner may not terminate the lease for other good cause during the initial term unless the owner is terminating the tenancy because of something the family did or failed to do in accordance with 24 CFR 982.310(d)(2). The owner is expressly prohibited from terminating the tenancy during the initial term of the lease based on the family's failure to accept the offer of a new lease or revision, or for a business or economic reason.</p> <p>(ii) If, after the initial term, the owner chooses not to renew the lease or terminates the lease for other good cause (as defined in 24 CFR 982.310(d)) to end the tenant-based assisted tenancy, the family would be required to move with continued tenant-based assistance or relinquish the tenant-based voucher and enter into a new lease to receive PBV assistance in order to remain in the unit.</p> <p>(4) Admission of in-place families is not subject to income-targeting under 24 CFR 982.201(b)(2)(i).</p>
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Offer of PBV Assistance	71	Baltimore County Office of Housing's procedures for tenant screening for the PBV program are not different than procedures for screening tenant-based applicants, which are provided in BCOH's Administrative Plan.	<p>This section was revised to add specific PBV regulation related to leasing, filling vacancies, tenant and tenant screening.</p> <p>Leasing [24 CFR 983.253(a)] During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by BCOH and that have been selected from BCOH's site-based waiting list. The contract unit leased to the family must be an appropriately sized unit, based on BCOH's occupancy standards</p>
Request for Proposals Process	67	None	<p>Add: BCOH is responsible for determining the amount of budget authority that is available for project-based vouchers and for ensuring that the amount of assistance that is attached to units is within the amounts available under the Annual Contributions Contract. Therefore, BCOH will conduct an annual analysis to determine the number of project-based vouchers available. Upon confirmation and approval from HUD, a Request for Application (RFA) which will include the number of PBVs available, an outline of the desired projects, how the applications will be evaluated, submission requirements along with a timeline for the Request for Proposals (RFP) will be issued as a public notice. The RFA process is not in lieu of the RFP process but in addition to the RFP process.</p>
Emergency Transfers under VAWA	103	None	<p>The Baltimore County Office of Housing (BCOH) is concerned about the safety of its tenants, participants and applicants and such concern extends to tenants who are survivors of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), this plan specifies the process for survivors of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer in BCOH's Housing Choice Voucher Program (HCVP), or the Project-Based Voucher (PBV) Program. VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.</p>

Exhibit C: Other Documentation and/or Certification Requirements

C.1 Resident Advisory Board Comments

The Resident Advisory Board met on February 8, 2025

Members in attendance were Karen Gilbert-Mims, Veronica Gavel, Lorraine Wise

This correspondence indicates the full support with no comments or concerns from the Resident Advisory Board (RAB) of the Baltimore County Office of Housing related to the efforts and actions of BCOH keep its housing choice voucher families, partners, stakeholders and community updated and informed of the plan elements.