


Joseph L. Smith
Chairman, Board of Commissioners

Janet Abrahams
President / Chief Executive Officer



MEMORANDUM

To: The Honorable President and Members of the Baltimore City Council
c/o Natawna Austin, Executive Secretary

From: Janet Abrahams, President and Chief Executive Officer 

Date: July 6, 2020

Re: City Council Bill 20-0217R Informational Hearing – Sanitization of Buildings under the Rental Assistance Demonstration Program and HUD Regulatory Authority

The Housing Authority of Baltimore City (HABC) was referred City Council Bill 20-0217R, Informational Hearing – Sanitization of Buildings under the Rental Assistance Demonstration Program and HUD Regulatory Authority, to address concerns about the materials used and schedules for sanitizing buildings that have been converted under the Rental Assistance Demonstration (RAD).

In 2015, HABC began converting a portion of its public housing sites to private ownership under RAD. In light of the chronic underfunding over the years of capital needs for public housing developments, RAD provided an opportunity to leverage funding through public-private partnerships so that extensive renovations could be made at these sites. Units converted under RAD will remain deeply affordable and are required to be leased to residents at the properties upon conversion, as well as applicants on HABC's public housing transfer and waiting lists.

To date, HABC has converted 23 public housing sites, consisting of over 3,700 units and totaling over \$717 million in investment to private ownership under RAD. The majority of these properties are mixed population high rise buildings, which provide rental units to seniors and non-elderly persons with disabilities. Given the structure of the high-rise RAD buildings, we have focused our response on these properties.

Although HABC maintains an interest in these properties and provides oversight to ensure that certain requirements are met, the management and maintenance of each RAD property is the responsibility of the new owner upon RAD conversion. In order to make the transition from public housing to the RAD subsidized housing as seamless as possible, HABC developed admission and continued occupancy criteria, known as the Long Term Affordable Criteria (LTA), which are comparable to the public housing criteria. HABC monitors the private management company's compliance with the LTA Criteria, which includes requirements concerning waiting list referrals, reasonable accommodations, lease enforcement, and the like.

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The following RAD sites are the high-rise buildings:

- | | |
|--------------------|---|
| Allendale | Brentwood |
| BE Mason | Chase House |
| Bel Park Tower | Ellerslie Apartments |
| Govans Manor | Pleasant View Gardens Senior Apartments |
| Hollins House | Primrose Place |
| J Van Story Branch | Rosemont Tower |
| Lakeview Towers | Terrace Garden Coop ¹ |
| McCulloh Extension | Wyman House |
| Monument East | |

Since HABC has only a small partnership interest in the RAD buildings, the private owners of each building are responsible for cleaning the common areas of the buildings. With the onset of COVID-19 in mid-March 2020, HABC has been actively working with the nine private management firms that oversee the sites that have substantial common areas and coincidentally house residents potentially at a higher risk due to being elderly and/or having pre-existing health conditions. The shared common areas of these buildings include entry/exit and lobby areas in each building, elevators and other common passages and areas. Below is a list of the management firms and the RAD sites they manage:

| Management Firm | RAD Property |
|-------------------------------|--|
| Pennrose | Wyman House |
| CT Group | Brentwood and Ellerslie |
| Enterprise | Allendale and Hollins House |
| Winn Residential | Bel Park, Chase House, and Lakeview Towers |
| Residential One | Bernard E Mason, Govans Manor, City View at McCulloh (McCulloh Extension), and Monument East |
| Community Housing Partnership | J Van Story Branch and Primrose Place |
| CSI | Terrace Garden Cooperative |
| Michaels Management | Pleasant View Gardens and Rosemont Towers |

Since the onset of the COVID-19 crisis, HABC has been working diligently with the management firms at the RAD sites to implement precautions and safety measures to protect the health and wellbeing of the residents in these

¹ The Terraces Garden Coop was a HOPE VI property that was already privately owned. HABC worked with owner to convert the public housing units under RAD.

buildings. For instance, in March 2020, HABC began conducting weekly conference calls with the managers and owners of the RAD sites, during which cleaning practices were discussed and documented. Updates to these practices have been implemented as new information was, and continues to be, made available.

Each management firm of the RAD sites has made a concerted effort to ensure the daily sanitizing of the common areas, including lobbies, hallways, doorways, elevators, mail rooms and laundry rooms, to prevent the spread of reduce the chances of spreading COVID-19. The management firms are following guidelines provided by the Centers for Disease Control and Prevention (CDC), the Maryland Department of Health (MDH) and the Baltimore City Health Department. The management firms determine the cleaning practices that would be used and tailor the plans to the needs of each RAD site. The summary of their collective efforts include:

- Preferred cleaning supply list;
- Increased cleaning schedule;
- Specific procedures for accessing elevators and laundry rooms;
- Temporarily closing many common areas;
- Cleaning frequently touched surfaces such as door handles, stairway railings, elevator buttons, reception desks, push plates and laundry room equipment; and
- Posting signage for best practices to reduce the spread of COVID-19.

HABC has asked each management firm to provide details on the current practices in place at the RAD sites that they manage. These details are attached as an addendum to HABC's response to this informational hearing. The firms were also provided the text of the City Council resolution 20-0217R that specifically referenced the cleaning products used in and schedules for cleaning common areas of the RAD buildings.

HABC has requested additional information to ensure that the private management firms are aware of the hearing before the Health Committee. HABC recommends that the City Council extend invitations directly to each private management firm to be present for the hearing, as well. The management firms have been both responsive and proactive in their collaboration with HABC in responding to COVID-19.