

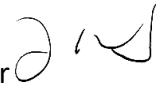
Robin Carter
Chair | Board of Commissioners

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 8, 2021

Re: Baltimore City Council Bill 21-0036R – Avoiding an Eviction Crisis

The Housing Authority of Baltimore City (HABC) has reviewed City Council Bill 21-0036R for the purpose of calling for a multi-faceted and comprehensive hearing on the looming eviction crisis and what can be done to avoid it. HABC provides federally funded housing programs and related services for Baltimore's low-income households. Through our Public Housing and Housing Choice Voucher (HCV) programs, HABC serves approximately 43,000 residents, including some of the city's most vulnerable populations such as the elderly, persons with disabilities, veterans and families with children.

HABC is regulated by the US Department of Housing and Urban Development (HUD) and must operate within the rules, statutes, guidelines and recommendations promulgated by HUD and the Federal government. This Agency supports the intent of this City Council Resolution and has taken a variety of measures, as allowed by HUD, to mitigate the economic impact that the COVID-19 pandemic has had on our households, including those outlined below.

Timely Adjustments to Rent due to Loss of Income

HABC conducts interim reexaminations of family income and composition for our public housing residents and HCVP participants, which can occur before the regularly scheduled annual reexamination. When a loss or reduction in income is reported, HABC will adjust the tenant-owed portion of rent which can allow for an increase in rental assistance.

Streamlined Procedures for Reporting Income Changes

HABC has streamlined its process for reporting changes in income and will accept tenant declarations or self-certification as the highest form of income verification to process interim reexaminations. HABC is authorized to do this through a temporary waiver provided by HUD (see below).

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Repayment Agreements for Rent Owed

HABC works with residents who are behind on their rent to enter into reasonable repayment agreements. HABC has the flexibility to structure the terms and length of these agreements to accommodate household circumstances as appropriate.

Collaboration with Community Partners

HABC works with its local partners to connect the families we serve to resources such as eviction prevention, employment programs, unemployment assistance and other programs, such as Emergency Rental Assistance.

Adoption of Certain Statutory and Regulatory Waivers

Pursuant to the Coronavirus Aid, Relief and Economic Stability (CARES) Act, HUD began issuing temporary waivers of numerous statutes and regulations. These waivers provide administrative flexibilities and relief to mitigate the impact of COVID-19. The majority of these waivers will expire after December 31, 2021. Among the temporary waivers that HABC adopted, several of them serve to help promote housing stability among public housing residents and HCVP participants as well as applicants for both programs, including the following:

- Income Verification – allows for self-certification as the highest form of income verification for both annual reexaminations and interim reexaminations of household composition and income
- Over Income Families – households whose income exceeds the maximum allowable may remain in their unit and continue to pay the same rent until the next annual reexamination and as opposed to having rent increased or dwelling lease terminated at the time HABC learns of over-income status.
- Family Unification Program (FUP):
 - Length of assistance for FUP youth extended for up to six months from the date the youth's assistance would have been terminated according to 36-month limit
 - Timeline for that HABC may accept referral from child welfare agencies for youth who will leave foster care from 90 days to 120 days
- Removal from Project-Based Voucher (PBV) Housing Assistance Payment (HAP) Contract – waives the requirement to remove a unit from PBV HAP contract after 180 days of zero housing assistance payments to the unit owner on behalf of the family. This situation arises when the family's income increases to such an extent that it no longer requires housing assistance. The waiver authorizes HABC to keep such unit under contract for a period that exceeds 180 days but does not extend beyond December 31, 2021.
- Absence from Unit – allows HABC to continue making payments and not terminate the HAP contract when there is an absence from a unit for over 180 days due to extenuating circumstances like hospitalization, extended stays at nursing homes or caring for family members.

Emergency Housing Vouchers

In addition to providing housing stability resources to our current residents and participants, HABC has been awarded 278 new Emergency Housing Vouchers (EHVs) that have been made available through the American Rescue Plan Act (ARPA). These vouchers will be used to assist individuals and families who are homeless or at risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking; or were recently homeless or have a high risk of housing instability.

Outreach to Public Housing Residents, HCVP Participants and Landlords

HABC has implemented a robust outreach campaign to inform our communities of all the assistance and options that are available to them. We have distributed information regarding eviction prevention and other resources to our public housing residents and HCVP participants through direct mailings of letters flyers and brochures, as well as social media and signage posted in our management offices and throughout our developments. We have also distributed information to our landlords and encourage them to coordinate with HABC and engage with their tenants as well as work with them on repayment agreements.

HABC will continue to take steps to help our residents remain housed and to house those who are homeless/at risk of being homeless to the greatest extent we are able.