

Housing Authority of the City of Cumberland

Attachment R – PHA Plan Amendment

July 17, 2019

The Housing Authority of the City of Cumberland is amending its annual and/or 5-year PHA Plan to include the HUD authorized and endorsed transfer of the Housing Authority of Allegany County into the Housing Authority of the City of Cumberland effective April 1, 2019 and to change the total unit count and sizes for Fort Cumberland Homes after RAD Conversion.

Housing Authority Transfer

The Housing Authority of Allegany County, MD030, was established on June 23, 1981. At its height, it operated 86 units of public housing which has now been reduced to 74. Over the years, it has become increasingly difficult for a small agency such as the Housing Authority of Allegany County to be compliant with the entire realm of local, State, Federal, HUD and OSHA regulations, reporting functions, procurement, and special HUD programs all while dealing with a decrease in Operating Subsidies and Capital Funding. With only five public housing employees, Allegany was also facing three key position retirements which requires extremely knowledgeable staff to carry on the program to prevent a negative impact upon the program, the residents served and the physical facilities.

Based upon these circumstances and a direction that HUD was initiating to combine small agencies, Allegany and Cumberland reached an agreement that a HUD defined Full Transfer of the small Allegany County agency into the mid-size Cumberland agency would be the most overall efficient approach to provide stability, organization and quality of services for the Housing Authority of Allegany County. The goals of the transfer were to provide:

- Immediate streamlining of many duplicate services;
- Access to current updated legally reviewed policies, procedures and plans;
- Benefit from bulk purchase of supplies and services;
- Benefit of a larger staff who are certified and experienced in their area of specialty versus one person remaining up-to-date on all areas;
- Use of grant writing, architectural, special project administration and specialized maintenance personnel;
- Inclusion into existing bidding and contract management activities.

The transfer has been implemented in accordance with HUD NOTICE PIH 2014-24 (HA) Issued: September 23, 2014 titled Process for Public Housing Agency Voluntary Transfers and Consolidations of the Public Housing Program. The transfer has been approved by HUD and monitored throughout the process. HUD has issued an executed Annual Contributions Contract which reflects the transfer of the Housing Authority of Allegany County into the Housing Authority of the City of Cumberland effective April 1, 2019. The Cumberland City Council and the Allegany County Commissioners both support the transfer and the combined agency.

The Housing Authority of Allegany County has a current fiscal year ending of September 30th. This will be changed to March 31st to coincide with the fiscal year ending of the Housing Authority of the City of Cumberland.

The Housing Authority is not currently under any form of voluntary compliance agreement, consent order, consent decree, final judicial ruling, and/or administrative ruling or decision.

In reviewing the Section 504 accessibility for both the Housing Authority of the City of Cumberland and the Housing Authority of Allegany County, there are no negative issues identified. The Section 504 requirements are ultimately monitored and addressed by the Chief Executive Officer with the assistance the Director of Maintenance Services directing the physical related aspects. This information is posted on the agency website. A Reasonable Accommodation Policy is posted in each rental office and on the agency website for public information on how to request a Reasonable Accommodation.

All current Housing Authority of the City of Cumberland policies and procedures which govern eligibility, admission, selection, occupancy, residential lease, terminations, grievance procedures, etc. will immediately replace those at Allegany County which are very similar and the replacement will cause minimal inconvenience.

The three Individual waiting lists currently being used by Allegany County will continue to be maintained as separate lists. The type of preferences used by both agencies are similar and the priority of them are also similar. However, the point value assigned in the respective agencies specialized housing software system in order to prioritize applicants within the waiting list is different as shown below. The Cumberland point value will be used moving forward.

Preference Type	Preference Explanation	Cumberland Points	Allegany Points
Employment	Families where the head, spouse or sole member is currently working 30 hours or more a week earning minimum wage or higher or receives SS/SSI.	40	10
	Families where the head, spouse or sole member is currently working more than 10 hours but less than 30 hours a week earning minimum wage or higher.	20	0
	Families where the head, spouse or sole member is enrolled in an employment training program or attending school on a full-time basis.	10	10
	Families where the head, spouse or sole member is receiving TDAP, TCA, Unemployment Benefits, or Child Support.	5	10
Elderly or Disabled	Families where the head, spouse or sole member is age 62 or older or is a person with disabilities; or	40	10
	Families where the head, spouse or sole member is age 55 or older or is a person with disabilities	20	0
Veteran	Families where the head, spouse or sole member is a disabled veteran	15	2
Displaced	Single applicant has been displaced by government action or whose dwelling has been extensively damaged or destroyed as a result of a disaster	5	4
Residency	Applicants who are current residents of the City of Cumberland	10	0
	Applicants who are not residents of the City of Cumberland but are currently residing in Allegany County	5	3

There will be no development name change or a change in bedroom sizes or quantities. The following charts define each property and the information concerning it.

Public Housing Project:	Willow Valley Apartments		Total # of Units:	34
PIC Development ID Number:	MD030000001 (old) MD005000009 (new)		Conversion Type:	Public Housing
Pre-Transfer Unit Type:	Elderly with Services		Post-Transfer Unit Type:	Elderly with Services
FY19 Capital Fund Allocation:	\$66,000		Estimated Reserves:	\$56,241
Transfer of Assistance:				
Units by Bedroom Size	Number of Units Pre-Transfer	Number of Units Post-Transfer	Change in Number of Units per Bedroom Type and Why (<i>De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc</i>)	
Efficiency	4	4	No Change	
One Bedroom	28	28	No Change	
Two Bedroom	2	2	No Change	
Three Bedroom	N/A	N/A	N/A	
Four Bedroom	N/A	N/A	N/A	
Total	34	34		
H/C Accessible	2	2	2 One Bedroom Units	

Public Housing Project:	Grande View Apartments		Total # of Units:	35
PIC Development ID Number:	MD030000001 (old) MD005000009 (new)		Conversion Type:	Public Housing
Pre-Transfer Unit Type:	Family		Post-Transfer Unit Type:	Family
FY19 Capital Fund Allocation:	\$67,095		Estimated Reserves:	\$57,895
Transfer of Assistance:				
Units by Bedroom Size	Number of Units Pre-Transfer	Number of Units Post-Transfer	Change in Number of Units per Bedroom Type and Why (<i>De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc</i>)	
Efficiency	7	7	No Change	
One Bedroom	25	25	No Change	
Two Bedroom	3	3	No Change	
Three Bedroom	N/A	N/A	N/A	
Four Bedroom	N/A	N/A	N/A	
Total	35	35		
H/C Accessible	2	2	2 One Bedroom Units	

Public Housing Project:	Scattered Site Homes		Total # of Units:	5
PIC Development ID Number:	MD030000001 (old) MD005000009 (new)		Conversion Type:	Public Housing
Pre-Transfer Unit Type:	Family		Post-Transfer Unit Type:	Family
FY19 Capital Fund Allocation:		\$9,700	Estimated Reserves:	\$8,271
Transfer of Assistance:				
Units by Bedroom Size	Number of Units Pre-Transfer	Number of Units Post-Transfer	Change in Number of Units per Bedroom Type and Why (<i>De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc</i>)	
Efficiency	N/A	N/A	N/A	
One Bedroom	N/A	N/A	N/A	
Two Bedroom	N/A	N/A	N/A	
Three Bedroom	3	3	No Change	
Four Bedroom	2	2	No Change	
Total	5	5		
H/C Accessible	2	2		

Change in Unit Count and Size

Housing Authority of the City of Cumberland submitted a Significant Amendment to the PHA Plan in 2017. In the Amendment, HACC proposed to change the total unit count from 80 to 78 (22 one-bedroom units / 31 two-bedroom units / 22 three-bedroom units / 3 four-bedroom units).

During the design and application process, it became necessary to modify the number of units and distribution of unit sizes from that previously stated in the 2017 Significant Amendment. The current plan is to change total unit from 80 to 77 (12 one-bedroom units / 31 two-bedroom units / 30 three-bedroom units / 4 four-bedroom units). The reasons for the changes are to include Section 504/ADA design standards and to provide adequate square footage for the Community Center.

Significant Amendment Attachments:

The following required certifications and documents will be attached for submission:

- a. HUD-50077 Civil Rights Certification
- b. HUD-50077-SL Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan
- c. Board of Commissioners Resolution
- d. Resident Advisory Board Sign in Sheet & Minutes of the 6/20/2019 meeting
- e. Public Hearing Sign in Sheet & Minutes of the 7/12/2019 Hearing.