

The Housing Authority of the City of Cumberland



Public Housing Authority Five Year Plan

April 1, 2020 – March 31, 2025

The Housing Authority of the City
of Cumberland is an agency within
the Cumberland Housing Group



**CUMBERLAND HOUSING
GROUP**

Leadership Team

Housing Authority Board of Commissioners

Bruce J. Irons, Chairman of the Board
J. Eric Delaney, Vice Chairman of the Board
Robert A. Godfrey, Commissioner
Sukh Gates, Commissioner
Jacqueline L. Clarke, Resident Commissioner

Cumberland Housing Group Senior Management Team

Steven J. Kesner, President & Chief Executive Officer
Michele E. Bender, Vice President & Chief Financial Officer
Carole S. Moreland, Director of Property Management Services
Charlene D. Custer, Director of Maintenance Services
Deborah E. Kesner, Director of Congregate Housing Services

HACC provided this document for the public to review and to receive its comments regarding the document. The Five-Year Plan was available for review and comment from **October 1, 2019 through November 14, 2019** at the following HACC office locations:

Main Office, 635 East First Street
(Plan supporting documents available at this location)
135 North Mechanic Street
235 Paca Street
701 Furnace Street
Website @ www.cumberlandhousing.org

A public hearing was held on October 14, 2019. All public comments received during the comment period and during the hearing are attached to this plan as well as the responses to each.

5-Year PHA Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 02/29/2016

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, 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. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A. PHA Information

A.1 PHA Name: Housing Authority of the City of Cumberland PHA Code: MD005

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 4/1/2020

PHA Plan Submission Type: ☒ 5-Year Plan Submission ☐ Revised 5-Year Plan Submission

Availability of Information. In addition to the items listed in this form, 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. 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 websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The proposed and approved PHA Plan, PHA Plan Elements, and all information relevant to the PHA Plan and any subsequent updates or significant amendments are available for inspection by the public during normal business hours at the following location:

Main Housing Authority Office, 635 East First Street, Cumberland, MD

The proposed and approved PHA Plan is available for review and inspection at the following locations:

John F. Kennedy Homes, 135 N Mechanic Street, Cumberland, MD

Queen City Tower, 235 Paca Street, Cumberland, MD

701 Furnace Street, Cumberland, MD

This information is also posted on our website at www.cumberlandhousing.org

The public may reasonably obtain additional information on the policies contained in the standard Annual Plan by contacting the Main Office of the Housing Authority located at 635 East First Street, Cumberland, MD 21502.

☐ PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

A.2

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			

B.	5-Year Plan
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B.1	<p>Mission. <i>State the PHA's mission for serving the needs of low- income, very low- income, and extremely-low income families in the PHA's jurisdiction for the next five years.</i></p>
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The mission of the Cumberland Housing Group, including the Housing Authority of the City of Cumberland, is to:

- ensure safe, decent, sanitary, affordable and well-maintained housing at a fair market rent;
- to create opportunities for residents' self-sufficiency and economic independence;
- to assure fiscal integrity by all low, very low and extremely low-income program participants;
- to develop affordable housing, both rental and for sale, in the City of Cumberland and surrounding communities; and
- to renew pride, restore confidence, promote reinvestment and revitalize neighborhoods.

B.2	<p>Goals and Objectives. <i>Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</i></p>
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Goal 1: Maintain Equal Opportunity in Housing for all Americans.

- A. Maintain affirmative measures to ensure access to affordable and a suitable living environment for assisted housing families regardless of race, color, religion, national origin, sex, familial status, and disability;
- B. Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required; and
- C. Increase the number of affordable housing units that meet ADA standards.

Goal 2: Improve the quality of the current assisted housing inventory.

- A. Maintain or improve upon the current assessment rating of High Performer by the HUD Real Estate Assessment Center (REAC) or the equivalent under Project Based Rental Assistance which reflects the quality of Management, Maintenance, Finance and Capital Fund operations conducted within the Housing Authority;
- B. Perform building and unit rehabilitation at all developments to modernize units, common areas and exteriors to improve overall appearance and provide modern living conditions;
- C. Work with tenants to improve the housekeeping and care of units;
- D. Maintain efforts to provide Smoke and Drug Free properties throughout the HACC inventory;
- E. Continue the working relationship and periodic meetings with Cumberland Police Department to reduce crime related issues within the developments, as well as a continued participation with the Maryland Criminal Intelligence Network; and
- F. Investigate and consider the designation of John F. Kennedy Homes and/or Queen City Tower for the Elderly and/or disabled with or without supportive services.

Goal 3: Evaluate and facilitate the conversion of Public Housing developments under the HUD Rental Assistance Demonstration (RAD) Program.

- A. With the assistance of outside advisors, evaluate the feasibility of the RAD conversion for each Public Housing development;
- B. Convert developments to either Project Based Rental Assistance or Project Based Voucher Assistance;
- C. Use Capital Funds to perform evaluation and pre-development activities;

- D. Perform changes to the Capital Fund Budget as a result of each approved RAD conversion;
- E. Perform changes to the construction and rehabilitation plan throughout the process;
- F. Develop and implement the financing structure required to complete the RAD conversion and associated construction and financing costs; and
- G. Establish new entities for ownership of the RAD converted developments.

Goal 4: Promote self-sufficiency and asset development of assisted households.

- A. Increase the number and percentage of employed persons in assisted families;
- B. Resident Services Coordinators to pursue, support and advertise self-sufficiency opportunities, activities and initiatives for public housing/PBRA residents;
- C. Continue to provide supportive services for the elderly through the Maryland Department of Aging sponsored Congregate Housing Services Program at Willow Valley Apartments;
- D. Work with residents to establish new or strengthen existing Resident Councils at all developments; and
- E. Continue to apply for funding for the Resident Services Coordinator positions to assist residents with services and housing needs.

Goal 5: Expand the supply of affordable housing opportunities.

- A. Promote and provide information on homeownership opportunities;
- B. Leverage private and public funds to create affordable housing opportunities;
- C. Expand development of housing to provide housing opportunities for low to middle income families; and
- D. With funding provided by the City of Cumberland CDBG program, continue to administer Closing Cost Grant Program for new homebuyers within the City.

B.2

Goal 6: Seek out Local, State and Federal funding opportunities to assist in the agency mission.

- A. Search out, apply for and utilize awarded additional funding from various sources to improve and enhance the services and housing inventory offered;
- B. Infrastructure: Replacement of sidewalks, curbs, pavement, utility lines, etc.;
- C. Recreation: Playground improvements at Jane Frazier Village and Fort Cumberland Homes;
- D. Crime Prevention/Security: Installation of additional video surveillance cameras; replace door locks and key card systems to enhance access and security; and
- E. Affordable Housing: Construction of affordable for sale housing; acquisition of property in the Rolling Mills area for expansion of affordable housing.

Goal 7: Pursue and implement administrative improvements.

- A. Continue routine periodic training and identify specialized training needs to maintain and enhance the knowledge of housing staff;
- B. Perform bi-annual review of all policies and procedures, including the Residential Lease Book and the Admissions and Continued Occupancy Plan, to ensure current State and Federal Regulations are met and to ensure consistent implementation;
- C. Prepare subordinate staff through training and job shadowing for replacement of retiring staff.

Progress Report. *Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.*

Goal 1: Improve the quality of assisted housing.

- A. Maintain the current HUD REAC High Performer designation of 91% and continue efforts to improve upon that score which reflects Management, Maintenance, Finance and Capital Fund operation quality. The High Performer rating has been achieved each year of the 2015-2020 plan period. Fiscal years ending March 31, 2015-2017 each scored a 95%, 2018 scored a 91% and 2019 has not been released but expected to be above 90%.
- B. Investigate and consider the designation of John F. Kennedy Homes or Queen City Tower for the Elderly and/or disabled. This has been discussed; however, the population of neither building currently support such effort. This will be considered for possible inclusion as part of the RAD conversion activities at one of the developments. As part of the transfer of the Housing Authority of Allegany County into HACC, Willow Valley Apartments entered into our inventory which is designated Elderly with additional support services funded through the Maryland Department of Aging.
- C. Perform building and unit modernization to all developments to improve overall appearance. Through the use of Capital Improvement Program Funds, Operating Funds and assorted grants the following improvements were experienced:
 - Jane Frazier Village: Replacement of perimeter walks, stairs, dumpster enclosures and parking areas; improvements to the toddler playground; new bus top and project sign; landscaping and drainage improvements; replacement of six building roofs; Lead Based Paint testing and abatement activities.
 - Fort Cumberland Homes: New playground and equipment; this development received a Contract for Housing Assistance Payments (CHAP) in January, 2017 permitting the RAD conversion from Public Housing to Project Based Rental Assistance with Capital Funds used for predevelopment activities and the contribution towards RAD financing.
 - John F. Kennedy: Construction of smoking shelter; plumbing improvements; this development received a Contract for Housing Assistance Payments (CHAP) in January, 2017 permitting the RAD conversion from Public Housing to Project Based Rental Assistance with Capital Funds used for predevelopment activities and the contribution towards RAD financing.
 - Queen City Tower: Complete replacement of heat and hot water equipment; replacement of windows; exterior painting and facade repairs; replacement of parking lot, light poles, walks and stairs; and Lead Based Paint testing.
 - Banneker Gardens: Sealing of parking lot; HVAC repairs; Energy Audit.
- D. Work with tenants to improve housekeeping of units. The Resident Services Coordinators have met with and provided housekeeping training to identified tenants who need assistance in maintaining their units in a better condition. In some cases, additional resources have been contacted to assist the tenant.

Goal 2: Expand the supply of assisted housing.

- A. Promote and provide homeownership opportunities. Under the Cumberland Housing Alliance, a new program was created entitled Cumberland Housing Revitalization Program (CHRP). Under CHRP, blighted properties are transferred from banks, City of Cumberland, etc., to the Alliance for the purpose of either rehabilitation or demolition followed by new home construction. Homes are then sold to low income households. Cumberland Neighborhood Housing Services

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B.3

- provides grants to low income homebuyers for closing costs within the City, funded through awards by the City CDBG Program.
- B. Leverage private or other public funds to create additional housing opportunities. Through the activities in the above paragraph, we are receiving homes and land at no cost. Additionally, the Alliance has been recertified as a Community Housing Development Organization (CHDO) which also qualifies it to access funding through the HOME Program for new housing activities. This is currently being explored.
 - C. Expand development of housing to provide housing opportunities for low to middle income families. As described above through CHRP, we are working to create new housing. Also, we are currently working with the City of Cumberland, the local Economic Development Council and the local Health System to develop plans for future housing in the area.
 - D. Construct and sell 8 townhouses at Cornerstone Hill to buyers <120% AMI. A total of eight new homes were completed and sold to eligible buyers. This development of 38 new homes in Cumberland is now completed and the Cumberland Housing Alliance continues to serve as the Management Agent for the Homeowners Association.

- Goal 3:** Promote self-sufficiency and asset development of assisted households.
- A. Increase the number and percentage of employed persons in assisted families. Resident Service Coordinators routinely provide information to residents on job fairs and employment opportunities. There has been no major change in the number of employed households for this period.
 - B. Continue to pursue, support and advertise self-sufficiency opportunities, activities and initiatives for public housing residents, including a permanent Resident Service Coordinator for families. The Resident Service Coordinators have provided an abundant amount of self-sufficiency opportunities, activities and initiatives which are communicated through our Facebook page, website, monthly newsletters, calendars and public postings.
 - C. Provide supportive services for elderly and families with disabilities. Through the addition of the County Housing Authority, we now have 34 units of supportive services for the elderly.
 - D. Work with residents to establish new or strengthen existing resident organizations at all developments. During the identified period, the two existing Resident Councils continue to be active and supported by our agency. A Resident Council was created several years ago at Banneker Gardens and has been very active with resident activities. A Resident Council has recently been formed at Fort Cumberland Homes.

- Goal 4:** Provide Improved Living Environment.
- A. Install security cameras in developments where they are not currently present or not in sufficient number to provide enhanced security. All developments were each equipped with numerous cameras and Digital Viewing and Recording (DVR) devices which are accessible from multiple offices and the City police station. After acquiring the two Allegany County developments, one was equipped with these devices and the other is scheduled to be equipped in the coming year.
 - B. Complete the implementation of smoke-free public housing at designated buildings at Jane Frazier Village and Fort Cumberland Homes. All common areas, individual units, properties, etc., are Smoke Free as of July, 2017. Designated smoking areas located away from buildings and entrances are established at John F. Kennedy and Willow Valley only.
 - C. Periodic meetings with Cumberland Police Department and ongoing participation with the Safe Streets Initiative. The CEO, Director of Property Management Services and the Security Patrol Coordinator continue to serve in roles and attend meetings with the Maryland Criminal

Intelligence Network which is the former Safe Streets Initiative. An excellent working relationship exists with local law enforcement agencies and intelligence sharing is frequent.

- D. Remodeling of units and public areas in developments to present a more modern appearance. The improvement of public areas has been ongoing and major efforts have been taken to improve and maintain the curb appeal of all developments. Through the RAD Program, extensive interior improvements are proposed for Fort Cumberland Homes and John F. Kennedy Homes. Banneker Gardens is still relatively new and efforts to improve the interior at Queen City Tower is in process. Certain improvements are being made to the unit interiors at Jane Frazier Village.

Goal 5: Ensure equal opportunity in housing for all Americans.

- A. Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability. The Cumberland Housing Group continues to advertise with the defined HUD Fair Housing Logos on all media formats. Housing applications can be accessed through four different offices by personal visit, mail, email or telephone and on our web site. Fair Housing procedures are established and followed. Periodic Fair Housing training is conducted in house, by a third party and through the Cumberland Human Resource Commission.
- B. Undertake affirmative measures to provide a suitable living environment for families living in assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability. The Cumberland Housing Group investigates all complaints and claims, followed by appropriate action taken to resolve the problem.
- C. Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required. The Cumberland Housing Group continues to advertise with the defined HUD Fair Housing Logos on all media formats. Outreach is periodically provided to area social service organizations.
- D. Increase the number of affordable housing units that meet ADA standards. Through the rehabilitation activities scheduled in 2020 for Fort Cumberland Homes under the RAD conversion of Public Housing, four additional units of ADA/Section 504 accessible units will be created. An additional five units are in the planning stage for John F. Kennedy Homes.

Goal 6: To apply for and use Community Development Block Grant funding for improvements.

- A. Infrastructure Improvements: Sidewalk and curb replacement around public housing developments; replacement of parking lot and alley beside Queen City Tower; installation of sidewalks, water lines, sewer lines and pavement for Roberts Street development; enlargement of JFK parking lot. Sidewalk and curb replacements have been completed around the perimeter of Jane Frazier Village as well as in front of Buildings 10 and 17. This area also had the parking areas excavated and replaced along with improvements to drainage, using all CDBG funds. The parking lot and alley beside Queen City Tower has been replaced, but not with the use of CDBG funding. No action has occurred with regard to Roberts Street or John F. Kennedy Homes.
- B. Recreation Improvements: Construct new playground at Fort Cumberland Homes. Completed.
- C. Crime Prevention/Security: Installation of video surveillance cameras at Jane Frazier Village, Fort Cumberland Homes and Banneker Gardens; replace door locks and key card systems to enhance access and security. The installation of video surveillance cameras is complete at these facilities. Door locks at Queen City Tower were replaced and the locks at Banneker Gardens were improved. Key card systems have been investigated with implementation planned for future years.

- D. Affordable Housing: Construction of 2-5 units of affordable for sale housing on Roberts Street; acquisition of property in the Rolling Mills area for expansion of public housing units and a new community center; acquisition of additional property at Roberts Street for new development; funding of Resident Services Coordinator position to assist residents with services and housing needs. One additional property was acquired for the Roberts Street development, but no other action to date. Multi-agency planning is under way for the Rolling Mill/Maryland Avenue area. The new Community Center has been included in the Fort Cumberland Homes RAD conversion. Application was made for this in 2018.
- E. Renovation and Rehabilitation: Renovation of all units at all developments except Banneker Gardens. This has been addressed in other goals.

Goal 7: Pursue and implement administrative improvements.

- A. Identify training needs and continue to provide monthly staff training. Routine training on various housing and maintenance related topics have been conducted as well as certification training for Property Management. A need for HVAC training for some maintenance personnel was identified and is in process.
- B. Perform bi-annual review of all policies and procedures to ensure current regulations and needs are met and to ensure consistent implementation. All policies, procedures, and Residential Lease have been reviewed and updated to current regulations.
- C. Consider contracting maintenance and management of other affordable housing properties. The Cumberland Neighborhood Housing Services was acquired in 2017. This agency provided Homebuyer education and counseling, closing cost grants and operated the NAILS Mission Project, which provides free home improvements to the low-income elderly and disabled homeowners in our community. In April, 2019, the Housing Authority of Allegany County was transferred into the Housing Authority of the City of Cumberland in order to streamline local public housing operations. The Cumberland Housing Group was established as a simplified collective "doing business as" name, incorporating the various agencies and programs offered under one combined operation at one location.

Goal 8: Submit Applications to HUD for the conversion of all Public Housing Developments to the Rental Assistance Demonstration (RAD) program to assist in meeting several of the above goals. Applications for all developments were submitted in November, 2015. In January, 2017 CHAP were awarded for Fort Cumberland Homes and John F. Kennedy Homes. A CHAP for Banneker Gardens and a Portfolio award was made in August, 2017, but later returned by HACC.

Goal 9: Coordinate with HUD to transfer the Housing Authority of Allegany County into our operations to improve operations, reduce administrative tasks and to reduce costs for salary and benefits. All transfer activities have been completed.

B. 5-Year Plan, Continued

Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.

The Housing Authority has taken the following actions to assist in serving the needs of the victims:

A. Adopted a VAWA policy which implements the applicable provisions of the Violence Against Women Reauthorization Act of 2013 as published in the Federal Register on November 16, 2016 and more generally to set forth the Housing Authority of the City of Cumberland's (HACC's) policies and procedures regarding protection to victims of domestic violence, dating violence, sexual assault, and stalking, as hereinafter defined.

B. Included within the professional bound Residential Lease Book which has been provided to all residents, and bound to the lease as an attachment, are the following documents which the Housing Authority provides:

- Addendum F Notice of Occupancy Rights Under Violence Against Women – HUD Form 5380
- Addendum F Certification of VAWA - HUD Form 5382

These forms are also on our website and available in all offices.

C. Developed a VAWA Emergency Transfer Plan to have in place in order to have a procedure to follow.

D. Monthly newsletters sent to residents contain the local contact information to receive assistance if a victim of domestic violence.

E. A good working relationship exists with our law enforcement and social service partners to enable reporting and referrals of victims and/or suspected victims of Domestic Violence.

Significant Amendment or Modification.

A Significant Amendment or Modification to the 5-Year Plan is defined as discretionary changes in the plans or policies of the Housing Authority that fundamentally change the mission, goals, objectives or plans of the agency and which require formal approval of the Board of Commissioners.

Any substantial deviation to the Admissions and Continued Occupancy Policy or activities described in the Plan will be subject to a full public hearing and HUD review before implementation. An exception to this definition will be made for any amendment or modification that is adopted to reflect changes in any regulatory requirements or the RAD related activities. Such changes will not be considered significant amendments.

Resident Advisory Board (RAB) Comments.

A. Did the RAB(s) provide comments to the 5-Year PHA Plan?

Y N

☒ ☐ A meeting was held on September 25, 2019 to review, discuss and elicit comments and suggestions on the proposed document. A second meeting was held following the Public Hearing.

B. If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attachment.

B.	5-Year Plan, Continued
B.7	<p>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan.</p> <p>The Cumberland City Administrator is required to complete HUD Form 50077-SL Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, to certify that the 5-Year PHA Plan and/or the Annual PHA Plan of the Housing Authority of the City of Cumberland is consistent with the City Consolidated Plan or State Consolidated Plan and the Analysis of Impediments to Fair Housing Choice of the City of Cumberland pursuant to 24 CFR Part 91.</p>
	<p>Statement on Changed Elements</p> <p>There were no elements of the 5-Year plan which was challenged.</p>
	<p>Deconcentration Policy</p> <p>The Deconcentration and Income Mixing is addressed in our Unit Offers & Applicant Placement Procedures which is an attachment to the Admissions and Continued Occupancy Policy (ACOP). The ACOP, referenced procedures and a chart of the current income mix are attached as part of our Plan.</p>
	<p>Statement on Public Housing Conversion/Repositioning</p> <p>This is partially addressed in section B.2 Goals and Objectives under Goal 3. In addition, the following activities are in process and expected to occur within this plan period.</p> <p>Fort Cumberland Homes</p> <p>Fort Cumberland Homes, significant amendment performed in 2017, is scheduled to conduct their RAD conversion activities in 2020. The current 80 units of Public Housing will be converted to 77 units of Project Based Rental Assistance. Currently there are no units which are accessible according to Americans with Disabilities Act (ADA) however through the RAD conversion, four ADA compliant units will be created consisting of one each of a 1-, 2-, 3- and 4-bedroom size. HACC plans to make the following changes during the renovation process to meet the needs of the current population as well as provide enhanced services to our residents:</p> <ul style="list-style-type: none"> A. Units in buildings 2, 3, 4, 5, 11 and 12 will be returned as their current size. B. Buildings 6 and 7 will have 5 units (D-H) in each building resized from a 2-Br to a 1-BR townhouse. Units A – C will remain 2-BR units. C. The following will be reconfigured to provide ADA/Section 504 compliant units: <ul style="list-style-type: none"> ➤ Building 1, unit H will convert from a 3-BR to a 4-BR assessible unit with a 1st floor bath and bedroom addition ➤ Building 8, unit A will convert from a 2-BR to a 3-BR assessible unit with a 1st floor bath and bedroom addition ➤ Building 8, unit D will convert from a 2-BR townhome to a ground floor assessible unit ➤ Building 8, unit C will convert from a 2-BR townhome to a 2nd floor 2-BR apartment ➤ Building 10, unit C will convert from a 2-BR townhome to a 1-BR assessible unit ➤ Building 10, unit D will convert from a 2-BR townhome to a 2-BR 2nd floor apartment

B.	5-Year Plan, Continued
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- D. Building 9, unit A will convert to a second floor 1-BR apartment with 3 2-BR units eliminated and replaced with a Community Center, Computer Lab and site office.
- E. In addition, two apartments will be available for hearing and visually impaired households.

Construction activities to be undertaken through the Rental Assistance Demonstration (RAD) conversion include significant in unit rehabilitation including: new kitchen cabinets, sink, and appliances; relocation of the washer and dryer hookups together; new bathroom shower surrounds, sinks, and vanities; new flooring throughout the unit; new windows and doors; new LED lighting; replacement or repair to all walls and ceilings with new paint; electrical systems throughout the development will be upgraded; individual unit heating and central air conditioning; covered front porch; and enlarged rear patio with privacy panels between units.

John F. Kennedy Homes

John F. Kennedy Homes, significant amendment performed in 2017, is under a CHAP at this time and is in the design phase. The submission of our application to the Maryland Department of Housing and Community Development for funding is planned for late 2019.

Thirty efficiency units will be converted to one-bedroom units through the enclosure of two balconies on each floor and isolated hallways. An additional five ADA compliant units will be created bring the total to ten (10% of development). The number of units will remain at 100.

Construction activities to be undertaken through the Rental Assistance Demonstration (RAD) conversion include significant in unit rehabilitation including: new kitchen cabinets, sink, and appliances; new bathroom shower surrounds, sinks, and vanities; new flooring throughout the unit; new windows; new LED lighting; replacement or repair to all walls and ceilings with new paint; electrical and Plumbing systems throughout the development will be upgraded; central air conditioning will be incorporated for all units; hallways and community areas rehabilitated with new flooring; and a rear portico.

Other Developments

The Queen City Tower, Banneker Gardens, Willow Valley, Grande View and Jane Frazier Village developments are currently being evaluated for the feasibility and viability for future RAD conversion with the ultimate plan by HACC to convert all developments to Project Based Rental Assistance under the RAD program. Future action will be addressed through a significant amendment.

Scatter Sites

Five units of Scattered Site housing was received under the transfer of the county PHA. These units continue to be under a demolition/disposition plan and will be sold as soon as vacated or other replacement housing created. These actions have previously been approved through the plan process and will require no further action.

B.	5-Year Plan, Continued
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	Civil Rights Certification
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	Acting on behalf of the Board of Commissioners of the Housing Authority of the City of Cumberland, the Chairman of the Board of Commissioners is required to execute HUD Form 50077-CR certifying that the Housing Agency will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
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	Certification of Compliance with PHA Plans and Related Regulations - High Performer
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	Acting on behalf of the Board of Commissioners of the Housing Authority of the City of Cumberland, the Chairman of the Board of Commissioners is required to execute HUD Form 50077-HP approving the submission of the 5-Year PHA Plan for the Housing Authority of the City of Cumberland fiscal year beginning 4/1/2020, hereinafter referred to as "the Plan", of which this document is a part and makes certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof.
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	Capital Fund Program
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	See HUD Form 50075.2 revision 2, of the 5 – year action plan for FYs 2018 – 2022 approved by HUD on 09/04/2019. Future grants will be reduced according to the pro-rated amounts for each RAD converted development.
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	Capital Fund Financing Program
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	The Housing Authority currently has a CFFP loan for Banneker Gardens with the future Capital Fund for our remaining four developments serving as collateral for that loan. Each time that we close on a RAD property/development conversion, we will pay down a sufficient amount in order to maintain a 1.3 coverage ratio on our ACC funding from the remaining properties.
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	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.
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Housing Authority of the City of Cumberland												
5 Year Plan for Capital Fund Program: 2018 - 2022												
Revision 2 as of 9/4/2019												
Development	Dev. Account No.	Work Category	Individual Work Items/Contracts	Total Budgeted Cost								
				2018	2019	2020	2021	2022				
PHA Wide	1406	Operations	HACC CFP Repayment Agreement	\$10,639.14	\$10,639.14	\$10,639.14	\$10,639.14	\$10,639.14				
PHA Wide	1406	Operations	Lead Based Paint Testing & Energy Audit	\$0.00	\$13,860.00	\$0.00	\$0.00	\$0.00				
PHA Wide	1408	Management Improvements	Staff Training & System Improvements	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00				
PHA Wide	1410	Administration	Administrative Salaries and Benefits	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00				
PHA Wide	9002	Loan Debt Obligation	CFFP Loan	\$127,132.80	\$127,132.80	\$127,132.80	\$127,132.80	\$127,132.80				
Jane Frazier Village	1480	Non-Dwelling Site Work	Asphalt, Concrete, dumpster, playground	\$50,000.00	\$53,800.00	\$50,000.00	\$50,000.00	\$50,000.00				
	1480	Dwelling Structure	Abate LBP to int. doors & baseboards	\$0.00	\$35,676.00	\$0.00	\$0.00	\$0.00				
	1480	Dwelling Unit - Exterior	Roof, gutters, soffit, siding, doors, windows, patios/ Lead Based Paint Abatement	\$150,000.00	\$150,000.00	\$150,000.00	\$150,000.00	\$150,000.00				
Fort Cumberland Homes	1480	Non-Dwelling Site Work	Asphalt, Concrete, dumpster, playground	\$28,000.00	\$5,000.00	\$34,000.00	\$34,000.00	\$34,000.00				
	1480	Non-Dwellint Interior	Abate LBP in basements	\$0.00	\$51,600.00	\$0.00	\$0.00	\$0.00				
	1480	Dwelling Structure	Abate LBP to exterior doors & lintels	\$0.00	\$79,700.00	\$0.00	\$0.00	\$0.00				
John F. Kennedy	1480	RAD Funds Pre Closing	RAD Conversion	\$100,000.00	\$30,000.00	\$400,000.00	\$400,000.00	\$400,000.00				
	1480	Non-Dwelling Interior	Main Plumbing Stack	\$60,000.00	\$100,000.00	\$0.00	\$0.00	\$0.00				
			Kitchen, Bath & Unit Renovations			\$30,000.00	\$30,000.00	\$30,000.00				
			Common Area-floors, walls, doors	\$0.00	\$0.00	\$30,000.00	\$30,000.00	\$30,000.00				
Queen City Tower	1480	RAD Funds Pre Closing	RAD Conversion	\$100,000.00	\$68,000.00	\$100,000.00	\$100,000.00	\$400,000.00				
	1480	Non-Dwelling Interior	Boiler, Pump Replacement	\$160,000.00	\$188,433.17	\$0.00	\$0.00	\$0.00				
			Common Area Finish Renovation			\$50,000.00	\$50,000.00	\$50,000.00				
	1480	Dwelling Unit - Exterior	Replace 1/2 Roof	\$0.00	\$50,000.00	\$0.00	\$0.00	\$0.00				
1480	Dwelling Unit - Interior	Renovation of Units	\$0.00	\$17,795.89	\$100,000.00	\$100,000.00	\$100,000.00					
Banneker Gardens	1480	Non Dwelling - Interior	Correction of UFAS Items	\$36,436.06	\$0.00	\$0.00	\$0.00	\$0.00				
			Replacement of AC Units		\$38,120.00	\$33,912.06	\$33,912.06	\$33,912.06				
			Totals	\$837,208.00	\$1,034,757.00	\$827,684.00	\$827,684.00	\$827,684.00				

5 Year Plan for Capital Fund Program: 2018 - 2022 Revision 2 as of 9/4/2019												
Housing Authority of Allegany County				Individual Work Items/Contracts	Total Budgeted Cost							
Development	Dev. Account	Work Category			2018	2019	2020	2021	2022			
PHA Wide	1408	Management Improvements	TBD		\$12,839.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00			\$5,000.00
PHA Wide	1410	Administration	Salary and Fringe Reimbursement		\$15,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00			\$5,000.00
Allegany (Willow Valley and Grande View)	1480	Non-Dwelling Interior	Office Carpet Replacement		\$0.00	\$10,000.00	\$0.00	\$0.00	\$0.00			\$10,000.00
	1480	Non-Dwelling Interior	WV & GV Interior Common Area Rehab		\$19,096.97		\$10,000.00	\$10,000.00	\$10,000.00			\$10,000.00
	1480	Non-Dwelling Interior	WV & GV Keyless Access and Security entry system Upgrades		\$0.00	\$50,000.00	\$0.00	\$0.00	\$0.00			\$10,000.00
	1480	Non-Dwelling Interior	WV & GV Floor Covering at lobby & elevator areas		\$0.00	\$30,000.00	\$0.00	\$0.00	\$0.00			\$0.00
	1480	Dwelling Unit Interior	WV & GV Flooring replacement in units		\$0.00	\$22,795.00	\$15,000.00	\$15,000.00	\$15,000.00			\$15,000.00
	1480	Dwelling Unit Interior	WV & GV Replace Unit Lighting		\$0.00	\$0.00	\$10,000.00	\$10,000.00	\$10,000.00			\$0.00
	1480	Dwelling Unit Interior	WV & GV Replacement of PTAC Units		\$0.00	\$0.00	\$18,000.00	\$18,000.00	\$18,000.00			\$18,000.00
	1480	Dwelling Unit Interior	WV & GV HVAC Improvements		\$0.00	\$0.00	\$50,000.00	\$40,000.00	\$40,000.00			\$40,000.00
	1480	Dwelling Unit Exterior	WV Roof Replacement		\$0.00	\$0.00	\$0.00	\$100,000.00	\$0.00			\$0.00
	1480	Dwelling Unit Exterior	WV & GV Window Repairs and Caulking		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00			\$20,000.00
	1480	Dwelling Constr-Mechanical	WV & GV Replacement of Trash Compactor		\$0.00	\$0.00	\$50,000.00	\$0.00	\$0.00			\$0.00
	1480	Dwelling Constr-Mechanical	WV & GV Generator Replacement		\$0.00	\$0.00	\$0.00	\$50,000.00	\$0.00			\$0.00
	1480	Dwelling Constr-Mechanical	WV & GV Elevator Upgrades		\$109,649.03	\$0.00	\$0.00	\$0.00	\$0.00			\$100,000.00
	1480	Dwelling Unit Site Work	WV & GV Seal and Stripe Parking Lot		\$0.00	\$5,000.00	\$0.00	\$0.00	\$0.00			\$10,000.00
	1480	Dwelling Unit Site Work	WV & GV Development Signs		\$0.00	\$5,000.00	\$0.00	\$0.00	\$0.00			\$0.00
1480	Dwelling Unit Site Work	WV Repairs to dumpster and enclosure		\$0.00	\$15,000.00	\$0.00	\$0.00	\$0.00			\$0.00	
1480	Dwelling Unit Site Work	WV Lead Based Paint testing		\$0.00	\$5,000.00	\$0.00	\$0.00	\$0.00			\$0.00	
			Totals	\$156,585.00	\$152,795.00	\$163,000.00	\$253,000.00	\$243,000.00				

Allegany (Willow Valley and Grande View)

Housing Authority of the City of Cumberland

Capital Fund Program Grant No: MD06P00550119

FFY

2019

Original Award Amount	\$867,781.00
Additional Award Amount	\$0.00
Revised Award Amount	\$867,781.00

Less: Costs Not Associated With Development Improvements:

Loan Debt Obligation	Acct # 9002	Banneker Garden CFFP Loan Payment	\$127,132.80
Operations	Acct # 1406	HUD/BG Repayment Agreement	\$10,639.14
Management Improvement	Acct # 1408	Staff Training, System Improvements	\$5,000.00
Administration	Acct # 1410	Administrative Staff Salaries/Benefits	\$10,000.00

Funding Available for Development Improvements = \$715,009.06

Distribution of Development Improvement Funds:

\$715,009.06 / 425 = \$1,682.37 per unit

Development	# Units	Per Unit Amount	Per Development	Budget Amount
JFV	125	Units x \$1,682.37 =	\$210,296.78	\$210,000.00
FCH	80	Units x \$1,682.37 =	\$134,589.94	\$35,000.00
JFK	100	Units x \$1,682.37 =	\$168,237.43	\$168,000.00
QCT	95	Units x \$1,682.37 =	\$159,825.55	\$260,009.06
BG	25	Units x \$1,682.37 =	\$42,059.36	\$42,000.00
	0	Units x \$1,682.37 =	\$0.00	\$0.00

425	Total Units		\$715,009.06	\$715,009.06
		Difference	\$0.00	\$0.00

Housing Authority of Allegany County

Capital Fund Program Grant No: MD06P00550119

FFY

2019

Original Award Amount	\$152,795.00
Additional Award Amount 9/28/18	\$0.00
Revised Award Amount	\$152,795.00

Less: Costs Not Associated With Development Improvements:

Management Improvement	BLI # 1408	Staff Training, System Improvements	\$5,000.00
Administrative Costs	BLI # 1410	Administrative Staff Salaries/Benefits	\$5,000.00

Funding Available for Development Improvements = \$142,795.00

Distribution of Development Improvement Funds:

\$142,795.00 / 74 = \$1,929.66 per unit

Development	# Units	Per Unit Amount	Per Development	Budget Amount
WV	34	Units x \$1,929.66 =	\$65,608.51	\$66,000.00
GV	35	Units x \$1,929.66 =	\$67,538.18	\$67,095.00
SS	5	Units x \$1,929.66 =	\$9,648.31	\$9,700.00

74	Total Units	\$142,795.00	\$142,795.00
	Difference	\$0.00	\$0.00

Admissions and **C**ontinued **O**ccupancy **P**olicy



Housing Authority of the City of Cumberland

Effective January 1, 2020

F. Over Income Limit

1. Definition of Over-Income - The United States Housing Act of 1937 defines the Over Income limit at 120 percent of the AMI. HUD currently calculates the ranges of income eligibility for the public housing program. In establishing the Over Income Limit, the Very Low Income (VLI) limit was selected because it is calculated for every FMR area and, in certain areas, factors in several adjustments to better align income limits with program requirements. Since VLI is preliminarily calculated as 50 percent of the estimated AMI and tiered by family size, in most cases, multiplying it by 2.4, will result in a figure matching 120 percent. The over-income limit is then compared to the family's adjusted income to determine income eligibility. HUD's income limits were developed by HUD's Office of Policy Development and Research and are updated annually. Upon receipt the Housing Authority will update the Over Income Limits.
2. Interim and annual reexaminations that take place after January 1, 2020 will be subject to the appropriate over-income limit.
3. Upon completion of form HUD-50058 for an annual reexamination or an interim reexamination, if the Housing Authority discovers that a family's income exceeds the applicable over-income limit, the Housing Authority must begin tracking these actions by documenting that the family exceeds the threshold and make a note in the tenant file to compare it with the family's income a year later.
4. If one year after the initial over-income finding by the Housing Authority, the family's income continues to exceed the over-income limit, the Housing Authority must provide written notification to the family. This notification must inform the family that their income has exceeded the over-income limit for one year, and if the family's income continues to exceed the over-income limit for the next 12 consecutive months, the family will be subject to:
 - A. The applicable unit Fair Market Rent;
 - B. The total monthly subsidy (Operating Fund and Capital Fund) that would have supported the household's unit; or
 - C. Other method prescribed by HUD.
5. If the initial over income determination was made during an interim reexamination, the Housing Authority must conduct a second interim income reexamination on that date one year later. However, if the Housing Authority discovers through an annual or interim reexamination that a previously over-income family has income that is now below the over-income limit, the family is no longer subject to these provisions. A previously over-income family would be entitled to a new two-year grace period if the family's income once again exceeds the over-income limit.
6. The Housing Authority will submit to HUD in the format requested an annual report of the number of families with incomes above the "Over Income Limit) that it houses and is on its waiting lists.