



# The Cumberland Housing Group

Cumberland Housing Alliance, Inc.  
Housing Authority of the City of Cumberland

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Date: September 20, 2024

Re: Five Year and Annual Plan, Public Review, Comment and Hearing

The Housing and Economic Recovery Act (HERA), Title VII, Small Public Housing Authorities Paperwork Reduction Act exempted qualified PHAs from the requirement to prepare and submit an annual plan. Qualified PHA's are defined as having a combined unit total of 550 or less public housing units and section 8 vouchers and is not designated troubled under the Public Housing Assessment System (PHAS) during the prior 12 months. Therefore, The Housing Authority of the City of Cumberland (HACC) is a qualified PHA.

The HACC, as a qualified PHA, is required to hold a public hearing regarding any changes to the goals, objectives, and policies of that agency and invite public comment regarding such changes. This year the HACC has completed its Five Year PHA Plan for the period covering 4/1/2025 – 3/31/2029.

A copy of the Five Year PHA Plan is available in any staffed HACC office for viewing. All info will be available on our website under the Newsroom/News Releases section <https://www.cumberlandhousing.org/news-releases/>

Changes include:

- ❖ The Admissions and Continued Occupancy Policy (ACOP) has been rewritten for Housing Opportunity Through Modernization Act (HOTMA) HUD Requirements. (This must be viewed on the website and is not available in paper form. Please schedule with any Property Manager to view.)
- ❖ Lease Attachment 9, Grievance Procedures and Lease Attachment 8, Community Service Policy – was amended due to ACOP language updates and current information.
- ❖ Lease Part I – was revised for current information and HOTMA.
- ❖ Added to 5 Year Plan - Disposal of 1034 Frederick St., due to the property being a scattered site and inefficient operations, with only one unit at the property.

The HACC also uses this public hearing to present the rolling Capital Fund 5-Year Action Plan HUD Form 50075.2 as approved by HUD on 8/12/2024, which provides a statement of capital improvements needed, including the recently added 2028 funding year. A copy of that form is available in any staffed HACC office for viewing.

Information referenced above is available for review at the Central Office of the Cumberland Housing Group located at 635 E. First Street, Cumberland or any of our staffed site offices during the hours of 8:00 AM to 4:00 PM Monday through Friday, (except Holidays) or at [www.cumberlandhousing.org](http://www.cumberlandhousing.org).

A public hearing will be held on November 14, 2024 at 10:00 AM, at the Jane Frazier Village Community Room connected to the Central Office. Public comments can be submitted in writing to our office prior to the hearing or voiced at the hearing.



	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.			
C.2	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?  Y <input checked="" type="checkbox"/> N <input type="checkbox"/></p> <p>(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  A meeting was held on September 23, 2024 to review, discuss and take comments and suggestions on the proposed document. A second meeting was held following the Public Hearing on November 14, 2024.</p>			
C.3	<p><b>Certification by State or Local Officials.</b></p> <p>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>			
C.4	<p><b>Required Submission for HUD FO Review.</b></p> <p>(a) Did the public challenge any elements of the Plan?  Y <input type="checkbox"/> N <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>			
D.	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>			
D.1	<p>Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See instructions for further detail on completing this item.</p> <table border="1" style="width: 100%;"> <tr> <td style="text-align: center;"><b>Fair Housing Goal: Affirmatively furthering Fair Housing and ensuring Equal Opportunity</b></td> </tr> <tr> <td><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></td> </tr> <tr> <td>Conducting comprehensive training and educational programs for all staff on fair housing laws, non-discriminatory practices and cultural competency. Ensure equitable access to assisted housing irrespective of race, color, religion, national origin, sex, familial status and disability.</td> </tr> </table>	<b>Fair Housing Goal: Affirmatively furthering Fair Housing and ensuring Equal Opportunity</b>	<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>	Conducting comprehensive training and educational programs for all staff on fair housing laws, non-discriminatory practices and cultural competency. Ensure equitable access to assisted housing irrespective of race, color, religion, national origin, sex, familial status and disability.
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**Form identification:** MD005-Housing Authority of the City of Cumberland form HUD-50075-5Y (Form ID - 711) printed by MICHELE BENDER in HUD Secure Systems/Public Housing Portal at 09/19/2024 09:14AM EST



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9/18/2024

5 Year PHA Plan 4/1/2025

## B.2 Goals and Objectives

### Goal 1: Affirmatively furthering Fair Housing and ensuring Equal Opportunity

- ❖ Conducting comprehensive training and educational programs for all staff on fair housing laws, non-discriminatory practices and cultural competency.
- ❖ Ensure equitable access to assisted housing irrespective of race, color, religion, national origin, sex, familial status and disability.

### Goal 2: Improve the efficiency and effectiveness of the agency

- ❖ Perform a review of various operational areas of the agency
- ❖ Ensuring new staff members receive comprehensive training and support for their success and integration into the organization and job shadowing for replacement of retiring staff.
- ❖ Periodic policy review to remain in compliance with HUD, as well as Federal and State laws.
- ❖ Begin the process of Inventory Removal of the one (one apartment) scattered site, 1034 Frederick St., to make operations more efficient.

### Goal 3: Enhancing the quality of existing housing inventory

- ❖ Enhance the overall appearance and provide modern living conditions through building and unit rehabilitation at all developments.
- ❖ Utilize Capital Fund Program Grant funds to address capital needs.
- ❖ Improve the housekeeping and care of units through effective collaboration with tenants.

### Goal 4: Provide and attract resident supportive services


- ❖ Work with business sectors to connect participants to resources that improve their access to economic opportunities, such as jobs and transportation.
- ❖ Continue the application of funding for the Public Housing Resident Services Coordinator (ROSS) position, and to enhance the assistance provided to residents with services and housing needs.
- ❖ Pursue and support a range of services for opportunities, activities and initiatives for public housing residents by performing a needs assessment on new residents.
- ❖ Effectively provide services for the elderly at Willow Valley Apartments through the Maryland Department of Aging Congregate Housing Services Program (CHSP). Services include meals, housekeeping, medicine distribution and personal care.

### Goal 5: Maintain a High Performer designation for the Public Housing Assessment System (PHAS) by the HUD Real Estate Assessment Center (REAC) or equivalent under Project Based Rental Assistance

- ❖ Provide training for new staff the maintenance aspects of the National Standards for the Physical Inspection of Real Estate (NSPIRE).
- ❖ Provide training on the PHAS categories of management, maintenance, finance and Capital Fund, to understand how each category impacts the overall performance of public housing agencies.



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**Goal 6: Evaluating the transition of remaining Public Housing Developments under the HUD Rental Assistance Demonstration (RAD) Program.**

- ❖ Evaluate the feasibility of converting remaining public housing developments under the HUD Rental Assistance Demonstration (RAD) Program, leveraging the expertise of outside advisors.
- ❖ Convert developments to Section 8 Project Based Rental Assistance/Tax Credit (when needed).
- ❖ Effectively use Capital Funds for evaluation and pre-development activities.

**Goal 7: Effectively seek out local, state and federal funding opportunities**

- ❖ Pursue additional funding from external sources to enhance services and housing inventory.
- ❖ Address Infrastructure needs, including the replacement of sidewalks, curbs, pavement, and utility lines.
- ❖ Maintaining and improving playgrounds that are safe, engaging and enjoyable for children.



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5 Year PHA Plan 4/1/2025

## B.3 Progress Report

### Goal 1: Maintain Equal Opportunity in Housing for all Americans.

- ❖ The Cumberland Housing Group continues to advertise with the defined HUD Fair Housing logos on all media formats. Housing applications can be accessed through three different offices by personal visit, mail, email, online portal RentCafe or telephone and on our website. Fair Housing procedures are established and followed. Periodic Fair Housing trainings are conducted in house, by a third party and through the Cumberland Human Resource Commission.
- ❖ We continue to make improvements to accessible units at Banneker Gardens and exterior accessible grounds areas where needed.
- ❖ For our most recent RAD project at JFK Apartments, an additional five ADA compliant units will be created, bringing the total to ten (10% of development).

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

- ❖ For our most recent PHAS score, we've maintained our High Performer Status, with a score of 92, an increase from 91 for FYE 3/31/22.
- ❖ Capital Funds have been used to improve both the interior living areas and exterior.
- ❖ Housekeeping inspections are completed after a tenant moves in. In addition, Property Managers are in each unit monthly with the exterminator, to catch any housekeeping issues that could go unnoticed otherwise.
- ❖ Property Managers are in each unit monthly with the exterminator, to catch any viewable smoking violations, that could go unnoticed otherwise.
- ❖ Our security guard has a great working relationship with the Cumberland Police Department and Combined Criminal Investigation team.
- ❖ John F. Kennedy transitioned to RAD and Section 8 PBRA March 21, 2024. Queen City Towers is the next and in early planning stages.

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

- ❖ After our second project recently converted to RAD, we've already contracted with our architect to begin the preliminary contract for Queen City Tower.
- ❖ Project Based Rental Assistance has been the preferred method for both Fort Cumberland Homes conversion to River Bend Court (2020) and John F. Kennedy Apartments to JFK Apartments (2024).
- ❖ Funds have been utilized for both John F. Kennedy Apartments and Queen City Towers.
- ❖ For the first year of the RAD conversion for John F. Kennedy Apartments, funds are now designated for the first year of HAP (Housing Assistance Payments) to the Partnership. After that, John F. Kennedy will no longer have Capital Funds.
- ❖ There was a change to increase our 1 bedroom units from 60 to 90, leaving only 10 efficiency units. An additional five ADA compliant units will be created bringing the total to ten (10% of development). The number of units will remain at 100.
- ❖ After a long process, on March 21, 2024 John F. Kennedy Public Housing property converted to RAD. This property is now owned by JFK Apartments, LP.



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- ❖ JFK Apartments, LP and JFK Apartments, LLC were formed. The initial name of the property was Wills Creek View and this was changed due to renaming of former Fort Cumberland Homes to River Bend Court.

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

- ❖ Resident Service Coordinator works with the residents who may be looking for a job. We keep a listing in our lobby of available jobs. On our website, our Section 3 Coordinator will advertise firms seeking employees.
- ❖ Our ROSS Resident Service Coordinator helps to coordinate our booth at the National Night Out, coordinated activities, partnered with Boys and Girls Club for after school and summer programs. We also work with the Judy Center for toddlers and infants.
- ❖ We continue serving 36 residents at Willow Valley Apartments under a Congregate program that is a grant awarded through Maryland Dept. of Aging Congregate program every year.
- ❖ COVID slowed the Resident Councils involvement, at not being able to have meetings, activities, etc.
- ❖ In 2022 we were awarded another ROSS Grant with HUD. This grant began June 1, 2022 and end May 31, 2025.

**Goal 5:** Expand the supply of affordable housing opportunities.

- ❖ Under the Cumberland Housing Alliance, a program was created titled Cumberland Housing Revitalization Program (CHRP). Under CHRP, blighted properties were transferred from land banks, City of Cumberland, etc., to the Alliance for the purpose of either rehabilitation or demolition followed by new home construction. Homes then are sold to low income households Only one property was completed and sold to a homeowner. Cumberland Housing Alliance completed the sale of 38 new homes in Cumberland.
- ❖ Through the activities in the above paragraph, previously we received homes and land at no cost. Due to increased home cost and only one property being finished, land has since been returned to the City of Cumberland.
- ❖ The City of Cumberland donated properties to our non-profit 501c3 organization. Due to increased cost to building materials, only one property was rehabbed and resold.
- ❖ We awarded closing costs to eligible home purchasers. The closing cost grant funds were not renewed during COVID.

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

- ❖ Yearly Community Development Block Grant funding is applied for and received, for sidewalk and curb replacements.
- ❖ Sidewalk and curb replacement around public housing developments have occurred in phases. Planned accessibility sidewalk improvements will occur at Grande View.
- ❖ Fort Cumberland Homes transitioned to RAD June 2020 and improvements were done. Jane Frazier Village received two new playgrounds under grant funds.
- ❖ Additional cameras have been installed, to give us broader coverage of the properties. All unit apartment doors have been upgraded to a key that is only able to be duplicated by the Housing Authority.
- ❖ One unit was rehabbed and sold to an income qualified family.

**Goal 7:** Pursue and implement administrative improvements.

- ❖ Routine training on various housing and maintenance related topics have been conducted as well as certification for Property Management and REAC/NSPIRE certifications.
- ❖ ACOF was last revised in 2020 and with HOTMA changes, a new Admissions and Continued Occupancy Policy are included in our Five Year Plan and Public Hearing. Residential Lease Book incorporated House Rules to be an attachment to the Lease. Other policies are reviewed periodically.
- ❖ Planning and preparations for staff already retired were planned well in advance. Future retirements within ten years will be another process.



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**9/18/2024**

**5 Year PHA Plan 4/1/2025**

## **B.7 Statement on Public Housing Conversion/Repositioning**

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.

### **John F. Kennedy Homes**

John F. Kennedy Homes, converted to RAD March 21, 2024.

Thirty efficiency units were 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.

### **Queen City Tower**

Queen City Tower, 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 2025 or later.

Construction activities to be undertaken through the Rental Assistance Demonstration (RAD) conversion include 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 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.

### **Scatter Sites**

The previous five units of Scattered Site housing that was received under the transfer of the Housing Authority of Allegany County PHA. All units were sold as of September 2021. These actions have previously been approved through the plan process and will require no further action.

### **1034 Frederick St.**

This property was acquired to occupy the residents of a previous Housing Authority of Allegany County property, with a DOFA date of April 30, 2021. With the property only having one unit and being a scattered site, the property isn't an efficient use of staff time, compared with other properties that have multiple units. The property is also experiencing extensive repairs due to moisture issues. To be more efficient, the PHA wishes to go through the Section 18 Disposition Inventory Removal Application process of the property. The property is a scattered site disposition.