

Audit Report

Office of Community Conservation

Tenant Relocation Assistance Payments



Office of the County Auditor
Baltimore County, Maryland
February 2010



MARY P. ALLEN, CPA
COUNTY AUDITOR

**BALTIMORE COUNTY , MARYLAND
OFFICE OF THE COUNTY AUDITOR**

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February 16, 2010

Honorable Members of the County Council
Honorable James T. Smith, Jr., County Executive
Baltimore County, Maryland

We have audited tenant relocation assistance payments administered by the Office of Community Conservation from June 2004 through January 2008. The payments were made for tenants displaced from the Kingsley Park, York Park, and Yorkway apartments, which the County purchased in calendar years 2004, 2006, and 2007.

Tenant relocation assistance totaling approximately \$1.1 million was provided during the audit period for 461 displaced tenant households. The Office established written relocation plans to define tenant eligibility and the types of relocation assistance (e.g., moving expenses, security deposits, utility connection fees, etc.) to be provided.

Our audit disclosed that the Office did not always comply with the written relocation plans and did not always follow internal accounting control procedures. Specifically, we noted that relocation assistance totaling \$5,010 was paid directly to tenants rather than to third parties (e.g., BGE, Comcast) as required; relocation assistance totaling \$4,284 was paid to seven individuals that did not meet the eligibility requirements of the plans; relocation assistance totaling \$13,225 was paid without proper supervisory approval; and relocation assistance totaling \$1,283 lacked supporting documentation to verify that the payments were for allowable relocation assistance costs. Our audit further disclosed that the written relocation plans did not adequately define tenant eligibility and did not clearly define all types of allowable relocation assistance costs.

A response to our findings from the Office of Community Conservation is included as an appendix to this report.

We wish to express our appreciation to the Office of Community Conservation for the cooperation and assistance extended to us during our audit.

Our audit reports and responses thereto are available to the public and may be obtained on-line at "www.baltimorecountymd.gov/agencies/auditor" or by contacting the Office of the County Auditor, 400 Washington Avenue, Towson, Maryland 21204.

Respectfully submitted,

A handwritten signature in cursive script that reads "Mary P. Allen". The signature is written in black ink and includes a horizontal line extending to the right from the end of the name.

Mary P. Allen, CPA, CGFM
County Auditor

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Background

As part of its efforts to preserve, stabilize, and enhance the physical and economic conditions of the County's urban communities, the County purchased three older apartment complexes in the southeast area for redevelopment purposes. Specifically, the County purchased the Kingsley Park apartments in 2004, the York Park apartments in 2006, and the Yorkway apartments in 2006 and 2007.

The Office of Community Conservation (the Office) was responsible for administering the relocation assistance payments for the displaced tenants. The Office processed relocation assistance payments totaling approximately \$1.1 million from June 2004 through January 2008 for 461 tenant households displaced from the three apartment complexes.

The Office established two written relocation plans – one plan for the Kingsley Park tenants and one plan for the York Park and Yorkway tenants – that defined tenant eligibility and the allowable types of relocation assistance costs to be paid.

Tenant Eligibility:

According to the Kingsley Park relocation plan, all tenant households listed on the County's Housing Assistance Payment (HAP) register¹ were eligible for relocation assistance. The Office used the HAP register to identify eligible tenants assuming that each landlord of the Kingsley Park apartments (a multi-building complex owned by multiple landlords) operated under a U.S. Department of Housing and Urban Development (HUD) agreement² to lease exclusively to qualified low-income households at below-market rent in return for Federal funding, which subsidized the rental amount collected from the low-income tenants.

According to the combined York Park and Yorkway relocation plan, all York Park tenant households listed on the County's HAP register and all Yorkway tenant households that were legal occupants as evidenced by a lease agreement were eligible for relocation assistance. The HAP register was used for the York Park tenants since, similar to the Kingsley Park landlords, the York Park landlord operated under the HUD rent subsidy agreement described above. The HAP register was not used for the Yorkway tenant households because the landlords did not participate in the HUD rent subsidy agreements.

¹ The HAP register was a listing developed by the Baltimore County Department of Social Services, Housing Office that identified households eligible for and receiving rental assistance funded by the U.S. Department of Housing and Urban Development.

² The HUD agreement referred to here was offered under HUD's Moderate Rehabilitation Program where the rental subsidy was associated with the rental unit. Tenants that qualified for the rental subsidy could not take the subsidy with them to another apartment complex (i.e., the subsidy was not portable).

Both relocation plans stated that unauthorized occupants (occupants not listed on a tenant household's lease) were not eligible for relocation assistance.

Types of Allowable Relocation Assistance Costs:

According to both relocation plans, allowable relocation assistance costs included moving expenses, security deposit payments, utility and telephone connections fees, housing application fees, temporary housing at hotels and related storage fees, and on a case-by-case basis, costs for pet fees, accessibility improvements, and paying off unpaid tenant debts (e.g., past due amounts owed for rent, utility bills, and credit card bills) to improve poor credit ratings that impaired a tenant's ability to obtain replacement housing.

In addition, the Office provided County-funded rental assistance to displaced tenant households that did not qualify for Federal Housing Choice Program³ rental assistance for their replacement housing. The County-funded rental assistance consisted of a lump-sum payment totaling the lower of \$5,250 or the 42-month increase in the monthly rent of the replacement housing over the monthly rent of the County-acquired unit.

According to the Office's records, the relocation assistance payments totaling approximately \$1.1 million consisted of the following:

<u>Type of Relocation Assistance</u>	<u>Amount</u>
County-funded Rental Assistance	\$ 336,587
Moving Expenses	319,288
Security Deposits	301,109
Overdue/Outstanding Rent and/or Utility Debts	100,397
Gas & Electric Fees	48,340
Other (e.g., credit card debt, telephone connection fees, hotel costs)	16,675
Housing Application Fees	12,228
Total	<u>\$ 1,134,624</u>

³ The Housing Choice Program is a rental subsidy offered by HUD to low-income households that can use the rental assistance for any rental unit of their choice (i.e., the subsidy is portable).

Findings and Recommendations

- 1. Relocation assistance totaling \$5,010 was paid directly to tenants rather than to third parties on behalf of the tenants as required by the written relocation plans.**

The written relocation plans state that relocation assistance payments are to be made to third parties (e.g., BGE, Comcast, moving companies) on behalf of the tenant, except that moving expenses may be paid directly to the tenant if the tenant elects to self-move (rather than use a moving company). However, our tests disclosed that relocation assistance totaling \$5,010 was paid directly to the tenants rather than to the third parties as required. Specifically, payments for certain types of relocation assistance such as gas and electric connection fees, housing application fees, security deposits, and hotel expenses were made directly to self-move tenants either as a separate payment or in combination with the moving expense payment. The Office advised that this practice allowed tenants to be provided assistance for certain out-of-pocket relocation expenses if the tenant furnished appropriate documentation (e.g., receipt for a paid expense or third party billing statement for a future expense).

We recommend that the Office comply with the written relocation plans requiring relocation assistance, except for self-moving expenses, to be paid to third parties (e.g., BGE, Comcast, moving companies) on behalf of the tenant.

- 2. Relocation assistance totaling \$4,284 was provided to seven individuals that were not eligible for relocation assistance.**

According to the Kingsley Park relocation plan, all tenant households listed on the County's Housing Assistance Payment (HAP) register were eligible for relocation assistance. The Office used the HAP register as of May 31, 2004 to identify eligible Kingsley Park tenant households. However, our review disclosed that relocation assistance totaling \$4,284 for security deposit costs was paid to seven individuals that did not reside at Kingsley Park and were not listed on the HAP register as of May 31, 2004.

The Office advised that although not on the HAP register as of May 31, 2004, the seven individuals had been approved for a rent-subsidized unit at Kingsley Park prior to May 31, 2004. The Office justified the relocation assistance for these individuals by citing the limited availability of similar HUD-subsidized rental housing in the County (i.e., York Park was the only other County apartment complex offering HUD-subsidized units under the Moderate Rehabilitation Program at that time).

We recommend that the Office provide relocation assistance only to eligible tenants.

- 3. Relocation assistance payments totaling \$13,225 were not properly approved and payments totaling \$1,283 lacked supporting documentation as required by the Office's internal control procedures.**

The Office's internal control procedures require relocation assistance payments to be approved by one of several authorized personnel: the Director of Community Conservation, the Chief of the Office of Planning and Community Development, the Grants Administrator, or the Budget Specialist. The procedures further require payments to be supported by proper documentation. However, our tests of relocation assistance payments totaling \$184,391 disclosed that payments totaling \$13,225 were not approved as required and payments totaling \$1,283 were not supported by any documentation to provide evidence that the payments were for allowable relocation assistance costs.

We recommend that the Office comply with the internal control procedures to properly approve and document all relocation assistance payments. Proper approval and supporting documents ensure that payments are for allowable relocation assistance costs in accordance with the written relocation plans.

- 4. The written relocation plans did not adequately define tenant eligibility and did not clearly define all types of allowable relocation assistance costs.**

The written relocation plans did not adequately define tenant eligibility to include all displaced tenant households and did not clearly define all types of allowable relocation assistance costs. For example, we noted the following:

- According to the Kingsley Park relocation plan, all tenant households listed on the County's HAP register were eligible to receive relocation assistance. The Office advised that this definition was written assuming that each landlord operated under a HUD rental subsidy agreement to lease exclusively to qualified low-income households. However, this definition excluded eight displaced tenant households that resided in three Kingsley Park apartment buildings owned by landlords that did not operate under a HUD agreement. As a result, these tenants were not on the HAP register. Nevertheless, since these tenants were similarly displaced as the tenants on the HAP register, they received relocation assistance totaling \$24,609.

- According to both relocation plans, displaced tenants that did not qualify for Federal Housing Choice Program rental assistance for their replacement housing were eligible to receive “reasonable moving expenses not to exceed \$5,250.” Although the plan referred to this payment as “reasonable moving expenses,” in practice, the Office provided a “rental subsidy” payment equal to the lower of \$5,250 or the 42-month increase in the monthly rent of the replacement housing over the monthly rent of the County-acquired unit. The County-funded “rental subsidy” assistance totaled \$336,587 for the tenants that did not qualify for Housing Choice Program rental assistance.

- Both relocation plans allowed certain types of additional relocation assistance on a case-by-case basis. The additional types of assistance consisted of the following: “payments of past debts (rent and/or utilities); storage of personal property; additional fees for pets; and a renovation for accessibility issues (ramps, grab bars, widening of doorways, etc.)” This additional case-by-case relocation assistance totaled \$117,072 for 144 displaced tenants. The Office advised that the purpose of providing the additional types of assistance was to resolve barriers that hindered a tenant’s ability to find replacement housing. However, the plans did not express this purpose or provide specific criteria for determining when these additional types of assistance would be warranted.

We recommend that the Office amend the written relocation plans as needed during the relocation process to address changing circumstances that affect relocation assistance policies such as tenant eligibility and allowable types of relocation assistance.

Audit Scope, Objectives, and Methodology

We have audited the Office of Community Conservation's procedures and controls for the payment of relocation assistance to displaced tenants of the Kingsley Park, York Park, and Yorkway apartments from June 2004 through January 2008. The audit was conducted in accordance with generally accepted government auditing standards, except for the requirement of an external quality control review. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In accordance with the Baltimore County Charter, Section 311, the objectives of our audit were to evaluate the adequacy of internal control practices and procedures over the Office's payments of relocation assistance and to determine compliance with any applicable laws and regulations. In planning and conducting our audit, we focused on tenant relocation assistance payments controlled and managed by the Office based on assessments of materiality and risk.

Our audit procedures included inquiries of appropriate personnel and inspections of documents and records. We also tested transactions and performed other auditing procedures that we considered necessary to achieve our objectives. Data provided in this report for background or informational purposes were deemed reasonable, but were not independently verified.

The Office's management is responsible for establishing and maintaining effective internal control over its tenant relocation assistance payments and for compliance with any applicable laws and regulations. Internal control is a process designed to provide reasonable assurance that objectives pertaining to the reliability of financial records, effectiveness and efficiency of operations including safeguarding of assets, and compliance with applicable laws, regulations, policies and procedures are achieved.

Because of inherent limitations in internal control, errors or fraud may nevertheless occur and not be detected. Also, projections of any evaluation of internal control to future periods are subject to the risk that conditions may change or compliance with policies and procedures may deteriorate.

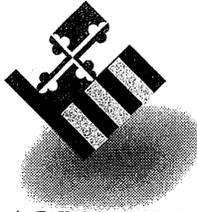
Our reports on fiscal compliance are designed to assist the Baltimore County Council in exercising its legislative oversight function and to provide constructive recommendations for improving County operations. As a result, our reports generally do not address activities we reviewed that may be functioning properly.

This report includes findings and recommendations relating to conditions that we consider to be significant deficiencies in the design or operation of internal control and administrative and operating practices and procedures that could adversely affect the Office's ability to maintain reliable financial records and/or comply with applicable laws, regulations, policies and procedures. Other less significant findings were communicated to the Office that did not warrant inclusion in this report.

APPENDIX A

OFFICE OF COMMUNITY CONSERVATION

RESPONSE



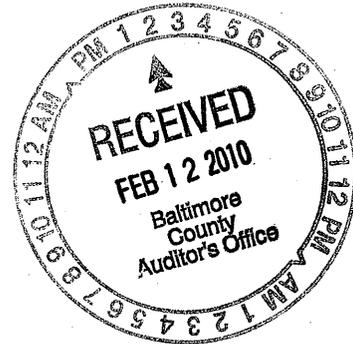
BALTIMORE COUNTY
M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

MARY L. HARVEY, *Director*
Office of Community Conservation

February 12, 2010

Ms. Mary Allen
Office of the Auditor
Old Courthouse, 2nd floor
Towson, MD 21204



Dear Ms. Allen:

I am in receipt of the Audit Report completed by your office for the Tenant Relocation Assistance Payments made to displaced residents of Kingsley Park Apartments including 1605, 1607, 1609 Gail Road, the York Park Apartments and the Yorkway Apartments.

The Office of Community Conservation appreciates the opportunity to respond to the Audit Report and appreciates the time we have spent with your staff over the last year or so as they reviewed records and documents to prepare the report.

The following is the response to the four findings identified by your staff and the corrective action taken as a result of the Audit Report:

1. Relocation assistance totaling \$5,010 was paid directly to tenants rather than to third parties on behalf of the tenants as required by the written relocation plans.

Corrective Action: The relocation plans have been amended to include policies pertaining to reimbursement of certain types of relocation assistance directly to the tenant. See attached amended relocation plans.

2. Relocation assistance totaling \$4,284 was provided to seven individuals that were not eligible for relocation assistance.

Corrective Action: The relocation plan for Kingsley Park has been amended to include an explanation and policies pertaining to benefits provided to tenants who are not listed on the HAP register. See attached amended relocation plans.

Ms. Mary Allen
February 12, 2010
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3. Relocation assistance payments totaling \$13,225 were not properly approved and payments totaling \$1,283 lacked supporting documentation as required by the Office's internal control procedures.

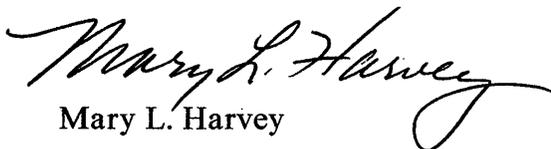
Corrective Action: In the future, the Office of Community Conservation will comply with all internal policies for approving payments and supplying supporting documentation for allowable relocation assistance payments.

4. The written relocation plans did not adequately define tenant eligibility and did not clearly define all types of allowable relocation assistance costs.

Corrective Action: The relocation plan for Kingsley Park has been amended to include policies for the residents who occupied the three buildings at 1605, 1607, 1607 Gail Road that were not owned by Landex Corporation and not under the Project Based Section 8 contract with HUD but were acquired by the county for redevelopment as part of the Kingsley Park project. Both plans were amended to include policies pertaining to the "rental subsidy" assistance offered to displaced tenants who were either ineligible for the Housing Choice Program or who chose not to participate in the Housing Choice Program and the plan offers further explanation as to when and under what circumstances additional benefits are offered to tenants.

On behalf of the Office of Community Conservation I would like to thank you again for the opportunity to respond to the Audit Report. It is my understanding that this response will be included in the final report. Please let me know if you have any questions regarding this response.

Sincerely,



Mary L. Harvey

cc: Fred Homan
Donna Morrison
Terri Kingeter

**Kingsley Park Apartments
Relocation Plan**

Baltimore County, Maryland



Baltimore County Office of Community Conservation
May 2004
Amended December 2009

Purpose of the Relocation Plan

Baltimore County, Maryland (Baltimore County) through the Department of Social Services, Housing Office and the Office of Community Conservation and other county agencies will implement a relocation plan (Plan) for residents of the Kingsley Park Apartments on a date to be determined by Baltimore County and the U.S. Department of Housing and Urban Development (HUD). The Plan will be applicable to the residents who legally occupy the 308 units within Kingsley Park Apartments **and the residents who occupy three buildings located at 1605, 1607, 1609 Gail Road that are not part of the Kingsley Park Apartments but are situated within the boundaries of the Kingsley Park Apartments.**

Baltimore County provides for decent, safe and affordable housing free from discrimination. Baltimore County also promotes freedom of housing choice and spatial deconcentration and provides incentives to private property owners to rent to lower income families

Documentation supports the adequate supply of rental housing throughout Baltimore County including housing that will be made affordable through the use of Housing Choice Vouchers. Baltimore County provides for incentives to property owners to participate in the program particularly in areas of Baltimore County that have a low concentration of assisted families. Encouraging participation by landlords throughout Baltimore County affords families broad opportunities for housing. Baltimore County continues to maximize payment standards to 110% of Fair Market Rents (FMR) and provides for extensions of the initial subsidy term of 120 calendar days.

Baltimore County subscribes to the policy that greater choice of housing opportunities must incorporate discouraging concentrations of families with rent subsidies in any community or neighborhood, while affirmatively furthering fair housing. These concentrations of poverty, known as High-Impacted Areas, have the following characteristics:

- Any area, location or apartment complex where the percent of HUD assisted families constitutes 40% or more of the total residents; and
- Any area where 10% or more of the residents are at or below the poverty level; and
- Any area that has a minority population at or above 25.9%.

The Project-Based Section 8 Kingsley Park Apartments meets Baltimore County's definition of a High-Impacted Area.

The Plan will accomplish the goals set forth by Baltimore County in its Public Housing Agency Plan to expand the availability of decent, safe and affordable housing by

- 1) providing rent subsidies
- 2) improving the quality of assisted housing
- 3) increasing assisted housing choices

The successful implementation of the Plan will also improve the community quality of life and economic vitality by

- 1) providing an improved living environment
- 2) making communities safe places to live, work, play and raise a family
- 3) promoting the stability and revitalization of communities
- 4) reducing the spatial concentration of housing opportunities for lower income persons.

The Plan provides for the notification of tenants, specific relocation benefits, and mobility counseling designed to move each family regardless of race, color, religion, national origin, sex familial status, and disability to affordable, decent, safe and sanitary housing. The relocation of residents is expected to take 6 months from the date of notification.

I. Notification of Tenants

All residents of Kingsley Park Apartments **and those residents occupying 1605, 1607, 1609 Gail Road** will receive the initial notice of the change in ownership by certified mail. Additional notifications may be necessary and will be accomplished through first-class mailings, door-to-door contact, and telephone calls. The Housing Office's (Housing Assistance Payment "HAP") register will be the official document of authorized residents **as well as rent rolls for 1605, 1607, 1609 Gail Road. A data base comprised of the HAP register and applicable rent rolls will be created and used to track all relocation activities.**

Tenant meetings will also be used as a means of communicating information regarding the relocation of tenants. These meetings will be held in a facility that is ADA accessible and within close proximity to the Kingsley Park Apartments. Information will be provided in alternate formats upon request.

Baltimore County staff will be required to keep detailed records of contacts with residents and this information will be monitored to ensure that an appropriate level of outreach is achieved.

II. Resident Interviews

Each household on the Kingsley Park Apartment HAP register **and those listed as occupants on the rent rolls for 1605, 1607, 1609 Gail Road** will be asked to complete an interview with Baltimore County staff at a time that is convenient for the resident(s). These interviews will take place at 1600 Gail Road in office space recently vacated by the Resident Advocate Program and known to residents as the RAP Center. Office hours will be flexible in an effort to accommodate all resident schedules. Home visits may be necessary due to accessibility issues. These home visits will be scheduled at the convenience of the resident.

Residents will be asked to provide information on household size and composition, and income. Residents will also be asked if special assistance is needed for anyone living in the household.

It may be determined through this initial interview that there are unauthorized tenants living in the household (tenants not on the lease). **Unauthorized tenants are not eligible for relocation benefits.**

Baltimore County staff will use the information collected to aid the residents in their search for other housing accommodations.

In addition to one-on-one interviews with residents, a Housing Resource Fair will be conducted at a location in close proximity to Kingsley Park Apartments as a way to introduce residents to prospective rental community owners and managers. Residents will have an opportunity to speak directly to prospective landlords and complete applications on-site. Such Resource Fairs will be held as necessary.

III. Relocation Assistance

All residents on the HAP register are deemed eligible to receive relocation assistance. The following benefits will be made available to eligible residents:

- A Housing Choice Program voucher
- Reasonable Moving Expenses (can be self-move or by others)
- Connection Fees for Utilities and Telephone
- Application Fees
- Security Deposits

Additional benefits may be offered on a case-by-case basis **if they are deemed necessary to overcome a barrier to relocation efforts efforts, such as**

- **Payments of past debts (rent and/or utilities) – if the debt(s) prevent a resident from securing new housing accommodations because of a past eviction or judgment for utility arrearages.**
- **Storage of personal property – if a hotel stay or other housing options are offered to the resident due to safety concerns.**
- **Additional fees for pets – if the resident currently has a pet.**
- **A renovation for accessibility issues (ramps, grab bars, widening of doorways, etc.)**

Special accommodations for elderly, disabled, and hard to house families will be provided in addition to the benefits listed above.

Each household will receive its benefit package in writing and Baltimore County staff will review the package with them during a face-to-face interview. All payments will be made on behalf of the residents except in the case of residents who elect to move their own belongings without benefit of a moving company or **in the case where the tenant can provide documentation in the form of a receipt for relocation expenses such as an application fee or utility connection fee. The check for moving expenses and other documented “out-of-pocket” expenses will be made payable to the resident.**

The use of moving expense funds can also be used to pay past debts. The amount of the debt will be deducted from the allowable “self-move” amount listed on the “Schedule of Performing a Self-Move”. The check will be made payable to the creditor and mailed to the creditor on the tenants’ behalf. The tenant will complete a form authorizing the county to deduct the amount from the self-move amount.

IV. Other Assistance

Baltimore County will provide on site management for Kingsley Park Apartments throughout the relocation phase. This will be accomplished through the use of an independent contractor with experience in multi-family housing management. The contractor will be responsible for the day-to-day operations and for general maintenance of the units. Management staff will be available to the residents of Kingsley Park during scheduled hours and emergency maintenance will be available after hours.

The Baltimore County Police Department through an on-site substation will provide security for the community.

As buildings are vacated they will be secured to prevent entry into the building. The secured buildings will be checked daily to ensure the safety of the remaining residents.

Hotel stays may be offered to families if they are the **last** remaining residents in a building. Residents may be offered other options such as another unit in an occupied building or encouraged to stay with family or friends until the resident can move into permanent housing. In this case there may be a need to store the resident's belongings until permanent housing can be identified. Baltimore County will pay for storage fees and hotel stays, in such instances.

Households that are determined to be ineligible for participation in the Housing Choice Program in accordance with Baltimore County's HUD approved administrative plan or **those who choose not to participate in the Housing Choice Program** will receive **reasonable relocation expenses** not to exceed \$5,250. **Reasonable relocation expenses are those benefits listed above under the sub-title "Relocation Assistance" as well as other assistance based on the needs of the tenant.**

A benefit will be provided to seven households that were approved for tenancy by the owners/managers of the Kingsley Park Apartments but never occupied their units. These residents were scheduled to move into their units on July 1, 2004 but because HUD, Landex and Baltimore County had announced the sale of the property, a decision was made to have these families move to other housing units elsewhere with the assistance of a security deposit provided by Baltimore County.

**York Park and Yorkway Apartments
Relocation Plan**

Baltimore County, Maryland

Baltimore County Office of Community Conservation
March 2006
Amended December 2009

Purpose of the Relocation Plan

Baltimore County, Maryland (Baltimore County) through the Department of Social Services, Housing Office and the Office of Community Conservation and other county agencies will implement a relocation plan (Plan) for residents of the York Park Apartments and the apartments known as the Yorkway Apartments. The Plan will be applicable to the residents who legally occupy the 80 units within York Park Apartments and the approximately 116 occupied units known as the Yorkway Apartments.

Baltimore County provides for decent, safe and affordable housing free from discrimination. Baltimore County also promotes freedom of housing choice and spatial deconcentration and provides incentives to private property owners to rent to lower income families

Documentation supports the adequate supply of rental housing throughout Baltimore County including housing that will be made affordable through the use of Housing Choice Vouchers. Baltimore County provides for incentives to property owners to participate in the program particularly in areas of Baltimore County that have a low concentration of assisted families. Encouraging participation by landlords throughout Baltimore County affords families broad opportunities for housing. Baltimore County continues to maximize payment standards to 110% of Fair Market Rents (FMR) and provides for extensions of the initial subsidy term of 120 calendar days.

Baltimore County subscribes to the policy that greater choice of housing opportunities must incorporate discouraging concentrations of families with rent subsidies in any community or neighborhood, while affirmatively furthering fair housing. These concentrations of poverty, known as High-Impacted Areas, have the following characteristics:

- Any area, location or apartment complex where the percent of HUD assisted families constitutes 40% or more of the total residents; and
- Any area where 10% or more of the residents are at or below the poverty level; and
- Any area that has a minority population at or above 25.9%.

The Project-Based Section 8 York Park Apartments meets Baltimore County's definition of a High-Impacted Area.

The Plan will accomplish the goals set forth by Baltimore County in its Public Housing Agency Plan to expand the availability of decent, safe and affordable housing by

- 1) providing rent subsidies
- 2) improving the quality of assisted housing

- 3) increasing assisted housing choices

The successful implementation of the Plan will also improve the community quality of life and economic vitality by

- 1) providing an improved living environment
- 2) making communities safe places to live, work, play and raise a family
- 3) promoting the stability and revitalization of communities
- 4) reducing the spatial concentration of housing opportunities for lower income persons.

The Plan provides for the notification of tenants, specific relocation benefits, and mobility counseling designed to move each family regardless of race, color, religion, national origin, sex familial status, and disability to affordable, decent, safe and sanitary housing. The relocation of residents is expected to take one year from the date of notification for York Park residents and 90 to 120 days for residents of the Yorkway Apartments.

I. Notification of Tenants

All residents of York Park Apartments will receive the initial notice from the owner advising them that the owner of property does not intend to renew the Section 8 contract. The letter will also advise residents of the sale of the property to Baltimore County and of the County's intention to redevelop the property for uses other than rental housing. Additional notifications may be necessary and will be accomplished through first-class mailings, door-to-door contact, and telephone calls. The Housing Office's (Housing Assistance Payment "HAP") register will be the official document of authorized residents. The HAP register will be used to track all relocation activities.

Tenant meetings will also be used as a means of communicating information regarding the relocation of tenants. These meetings will be held in a facility that is ADA accessible and within close proximity to the York Park Apartments. Information will be provided in alternate formats upon request.

Baltimore County staff will be required to keep detailed records of contacts with residents and this information will be monitored to ensure that an appropriate level of outreach is achieved.

Yorkway Apartment residents will receive notification from Baltimore County of the County's intention to purchase the building in which their unit is located when the owner of the building signs a contract with Baltimore County through the Bureau of Land

Acquisition. The notification to residents is based on the rent roll or leases for legal tenants obtained by the Bureau of Land Acquisition and/or Community Conservation. **In the case that no rent roll exists, tenants will be asked to provide adequate documentation such as a lease or rent receipts showing legal tenancy of the property.** The owner of the building is required by law to give at least a 30-day notice to vacate the unit. Baltimore County will take ownership of the building(s) after the Baltimore County Council approves the contract of sale and the tenants have vacated the building.

II. Resident Interviews

Each household on the York Park Apartment HAP register and **authorized** tenants of the Yorkway Apartments will be asked to complete an interview with Baltimore County staff at a time that is convenient for the resident(s). These interviews will take place at 2627A Yorkway. Office hours will be flexible in an effort to accommodate all resident schedules. Home visits may be necessary due to accessibility issues. These home visits will be scheduled at the convenience of the resident.

Residents will be asked to provide information on household size and composition, and income. Residents will also be asked if special assistance is needed for anyone living in the household.

It may be determined through this initial interview that there are unauthorized tenants living in the household (tenants not on the lease). **Tenants who cannot document legal possession of the unit are ineligible for relocation benefits.**

Baltimore County staff will use the information collected to aid the residents in their search for other housing accommodations.

III. Relocation Assistance

All York Park residents on the HAP register and **authorized** residents residing in the Yorkway Apartments are deemed eligible to receive relocation assistance. The following benefits will be made available to eligible residents:

- A Housing Choice Program voucher
- Reasonable Moving Expenses (can be self-move or by others)
- Connection Fees for Utilities and Telephone
- Application Fees
- Security Deposits

Additional benefits may be offered on a case-by-case basis, **if they are deemed necessary to overcome a barrier to relocation efforts**, such as

- Payments of past debts (rent and/or utilities) - **if the debt(s) prevent a resident from securing new housing accommodations because of a past eviction or judgment for utility arrearages.**
- Storage of personal property – **if a hotel stay or other housing options are offered to the resident due to safety concerns.**
- Additional fees for pets – **if the resident currently has a pet.**
- A renovation for accessibility issues (ramps, grab bars, widening of doorways, etc.)

Special accommodations for elderly, disabled, and hard to house families will be provided in addition to the benefits listed above.

Each household will receive its benefit package in writing and Baltimore County staff will review the package with them during a face-to-face interview. All payments will be made on behalf of the residents except in the case of residents who elect to move their own belongings without benefit of a moving company or **in the case where the tenant can provide documentation in the form of a receipt for relocation expenses such as an application fee or utility connection fee. The check for moving expenses and other documented “out-of-pocket” expenses will be made payable to the resident.**

The use of moving expense funds can also be used to pay past debts. The amount of the debt will be deducted from the allowable “self-move” amount listed on the “Schedule of Performing a Self-Move”. The check will be made payable to the creditor and mailed to the creditor on the tenants’ behalf. The tenant will complete and sign a form authorizing the county to deduct the amount from the self-move amount.

IV. Other Assistance

Baltimore County will provide on site management for York Park Apartments throughout the relocation phase. This will be accomplished through the use of personnel with experience in multi-family housing management. The contractor will be responsible for the day-to-day operations and for general maintenance of the units. Management staff will be available to the residents of York Park during scheduled hours and emergency maintenance will be available after hours.

The Baltimore County Police Department through an on-site substation will provide security for the community.

As buildings are vacated they will be secured to prevent entry into the building. The secured buildings will be checked daily to ensure the safety of the remaining residents.

Hotel stays may be offered to families if they are the remaining residents in a building. Residents may be offered other options such as another unit in an occupied building or encouraged to stay with family or friends until the resident can move into permanent housing. In this case there may be a need to store the resident's belongings until permanent housing can be identified. Baltimore County will pay for storage fees and hotel stays, in such instances.

Households that are determined to be ineligible for participation in the Housing Choice Program in accordance with Baltimore County's HUD approved administrative plan or **those who choose not to participate in the Housing Choice Program** will receive rental assistance not to exceed \$5250 in addition to other **reasonable relocation expenses**.

It may be necessary at some point to move the relocation office during the relocation process. Notification of the move will be provided to all residents stating the new location and hours of operation.

AUDIT TEAM

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