

The Housing Authority of Prince George’s County

PHA Code: MD015

2025 Annual PHA Plan:

ADDENDUM

B.1 Revision of Existing PHA Plan Elements.

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

Financial Resources

HAPGC has revised its financial resources to reflect updated FY2026 funding, including Capital Fund planning and expanded federal support. Total anticipated resources for FY2026 equal \$113,574,239, comprised of \$2.31 million in Public Housing Operating Funds, \$2.12 million in Capital Fund grants, \$207,525 in FSS grant funds, \$450,678 in Radon Grant funds, \$98.67 million in Housing Assistance Payments, \$8.26 million in HCV administrative subsidies, and \$400,000 in Community Development Block Grant funds. Additional resources include \$893,397 in public housing rental income, \$17,423 in other income, and \$250,000 in bond program support. These resources will be applied to public housing operations, capital improvements, service coordination, environmental safety, and voucher program administration.

Significant Amendment/Modification

HAPGC has updated its Admissions and Continued Occupancy Policy (ACOP) to incorporate the requirements of the Housing Opportunity Through Modernization Act of 2016 (HOTMA), as implemented through HUD’s Final Rule published on February 14, 2023, and enforceable July 2025.

These updates include, but are not limited to:

- Revised methodologies for calculating annual income at admission, interim, and annual reexaminations, including the use of prior-year income and anticipated income, as applicable;
- Implementation of streamlined income determination policies, including provisions related to fixed-income households and, where adopted, safe harbor income determinations;
- Updated verification procedures, including expanded use of self-certification and third-party documentation;
- Adoption of new asset limitation thresholds and revised treatment of net family assets, including policies governing ownership of real property suitable for occupancy; and
- Updated deduction standards and hardship provisions consistent with HOTMA requirements.

HAPGC has determined that these changes constitute a **significant amendment/modification** to the PHA Plan because they materially affect eligibility determinations, rent calculations, and continued occupancy policies for public housing residents.

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The updated ACOP reflects the requirements of the HOTMA Final Rule and will be implemented in accordance with HUD-established compliance timelines, including full enforceability as of July 2025.

To the extent HUD has provided for phased implementation or system-related adjustments, HAPGC will implement applicable provisions in accordance with current HUD guidance while ensuring full compliance with the July 2025 enforceability requirements.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

HAPGC is submitting its deconcentration policy to the HUD Field Office for review with the 2024 Annual Plan resubmission.

HAPGC promotes deconcentration of poverty and income mixing in accordance with 24 CFR 903.2. The Authority will encourage a broad range of income levels within its developments by offering housing opportunities that attract higher-income families to lower-income sites and vice versa. HAPGC will conduct annual analyses of resident income levels by development, related census tract data, and the waiting list to identify income patterns and establish appropriate marketing or incentive strategies. All actions will be implemented uniformly and in a nondiscriminatory manner. To achieve deconcentration goals, HAPGC may provide incentives to families whose income levels support the objective of income diversity within specific developments. Incentives will be applied consistently and equitably, in compliance with applicable laws

B.2 New Activities

(b) If any of these activities are planned for the applicable Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

Occupancy by Police Officers: HAPGC prioritizes strengthening safety and security measures across its public housing developments and recognizes the potential benefit of implementing an Occupancy by Police Officers program consistent with HUD requirements. During the upcoming plan year, HAPGC will collaborate with the Prince George’s County Police Department to identify appropriate units, develop Memoranda of Understanding (MOUs), and establish written terms and conditions of tenancy for sworn officers residing on-site. Once finalized, these designations

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and agreements will be incorporated into a future Annual Plan submission for HUD review and approval, in accordance with PIH Notice 2024-03 and 24 CFR 960.505. Until formally approved, no units will be designated or occupied under this category.

Units with Approved Vacancies for Modernization: HAPGC has received HUD approval for temporary vacancies at select developments to facilitate modernization and rehabilitation activities. Projects include Marlborough Towne, Rolling Crest Village, Kimberly Gardens, and Cottage City Towers. Work will address infrastructure, system replacement, and accessibility upgrades under the Capital Fund Program and CDBG initiatives. All activities are conducted in accordance with HUD modernization and URA requirements, ensuring full resident protections and right-to-return. These efforts align with the County's Consolidated Plan and HUD's modernization objectives to improve safety, accessibility, and sustainability within HAPGC's public housing portfolio.

Other Capital Grant Programs: HAPGC will continue to implement these programs to support modernization, safety, and sustainability improvements. Current initiatives include the CDBG-funded infrastructure project at Kimberly Gardens (\$119,999), countywide safety and security upgrades, and energy-efficiency retrofits across multiple developments. Additional activities will address accessibility and 504 compliance under the Voluntary Compliance Agreement (VCA) and the Disability Rights Maryland (DRM) Settlement Agreement. All projects are administered in accordance with HUD and County requirements and align with the Consolidated Plan priorities to preserve affordable housing, improve living conditions, and enhance resident safety and quality of life.

B.3 Progress Report

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

Goal 1 – Expand the Supply of Assisted Housing

HAPGC continued portfolio repositioning activities, including RAD conversions and Section 18 blends, to preserve and modernize assisted housing and support long-term financial stability. Public housing occupancy was maintained at or above 95 percent, and HCV utilization remained on track to achieve full budget authority.

Goal 2 – Improve the Quality and Management of Assisted Housing

HAPGC continued capital and management improvements across its assisted housing portfolio. Activities included modernization and rehabilitation efforts, improved unit turnaround times, strengthened property management practices, expanded landlord participation, and continued compliance with HUD reporting and REAC/NSPIRE requirements. The Authority also advanced accessibility improvements, including plans to expand ADA/Section 504-compliant units from 376 to 500 within 24–48 months in accordance with the VCA and DRM Settlement Agreement.

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Goal 3 – Promote Resident Self-Sufficiency and Economic Opportunity

HAPGC continued to support resident self-sufficiency by expanding participation in the FSS and ROSS programs, reinstating resident councils, and providing supportive services to promote employment, financial independence, and homeownership opportunities.

Goal 4 – Ensure Fair Housing and Equal Opportunity

HAPGC continued implementation of affirmative fair housing and equal opportunity measures through staff training, accessibility compliance efforts, and ongoing actions to meet federal fair housing and accessibility requirements, including obligations under the VCA and DRM Settlement Agreement.

Goal 5 – Promote Safe, Sustainable, and Energy-Efficient Communities

HAPGC continued to incorporate energy-efficiency and green-building measures into its operations and capital activities to support safe, sustainable, and affordable housing communities.

B.4 Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

HAPGC has not yet submitted its Capital Fund Program (CFP) Five-Year Action Plan. The Agency anticipates resubmitting its Fiscal Year 2024 and 2025 Annual Plans to HUD for review and approval. Upon HUD approval of these plans, HAPGC will prepare and submit the corresponding CFP Five-Year Action Plan in accordance with HUD regulations and applicable submission requirements.

B.5 Most Recent Fiscal Year Audit

(b)If yes, please describe:

Per the FY 2024, the following findings were noted:

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Significant Deficiency Finding: HAPGC did not consistently maintain adequate documentation or internal control evidence to support eligibility determinations for Housing Choice Voucher (HCV) participants.

Significant Deficiency Finding: HAPGC did not consistently maintain or provide adequate documentation to demonstrate compliance with HUD requirements for selecting new tenants from the Housing Choice Voucher (HCV) waiting list.

Significant Deficiency Finding: HAPGC did not consistently document or maintain adequate evidence that rent reasonableness determinations were completed for units under the Housing Choice Voucher (HCV) program.

Material Weakness Finding: HAPGC did not consistently enforce Housing Quality Standards (HQS) requirements or document timely re-inspections and enforcement actions.

Material Weakness Finding: HAPGC did not consistently complete or document Housing Quality Standards (HQS) inspections as required by HUD.

C.1 Resident Advisory Board (RAB) Comments.

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

HAPGC’s original Annual Plan submission was not approved and therefore requires a revised submission and an additional public comment period in accordance with HUD requirements. In connection with the revised submission, the Authority will consult with the Resident Advisory Board (RAB) and incorporate all applicable comments received through the resident consultation process.

In accordance with HUD’s PHA Plan requirements at 24 CFR Part 903, HAPGC will provide public notice and make the draft revised Annual Plan available for resident and public review during the required 45-day public comment period. At this time, the required public notice has not yet been posted. The Authority will post the public notice and make the revised draft Annual Plan available for public inspection in advance of the commencement of the public comment period and will conduct the required public hearing upon conclusion of the comment period. HAPGC remains committed to providing meaningful opportunities for resident participation and public engagement in the development of its PHA Plans and related planning activities.

C.2 Certification by State or Local Officials.

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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.

HAPGC’s Agency Plan is consistent with the Prince George’s County 2021–2025 Consolidated Plan. Both plans share aligned priorities that focus on addressing affordable housing shortages, supporting vulnerable and special needs populations, expanding opportunities for resident self-sufficiency, and preserving existing affordable housing stock. The certification is included as an electronic attachment.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.

Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations*

Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.

HAPGC certifies compliance with all applicable civil rights requirements pursuant to Form HUD-50077-ST-HCV-HP. Since the last Annual Plan, HAPGC has revised its ACOP and HCV Administrative Plan to incorporate HOTMA requirements, including updated income exclusions and new waitlist management preferences. The Authority continues to implement the Voluntary Compliance Agreement (VCA) and DRM Settlement Agreement through expanded ADA/Section 504 accessibility and enhanced reasonable accommodation procedures. Revisions have also been made to strategies addressing housing needs, deconcentration, financial resources, and community service/self-sufficiency programs, including the addition of the ROSS Grant. These updates ensure that the Agency Plan remains consistent with HUD regulations, civil rights obligations, and the community's housing needs.

C.4 Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

In accordance with HUD’s PHA Plan requirements at 24 CFR Part 903, HAPGC will provide public notice and make the draft revised Annual Plan available for resident and public review during the required 45-day public comment period. At this time, the required public notice has not yet been posted. The Authority will post the public notice and make the revised draft Annual Plan available for public inspection in advance of the commencement of the public comment period and will conduct the required public hearing upon conclusion of the comment period.

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Following completion of the public review and comment period and the public hearing, HAPGC will review and consider all written and verbal comments received from residents and members of the public, as applicable, and will revise the Annual Plan as necessary based on public input.

HAPGC remains committed to maintaining open and accessible opportunities for resident participation and public engagement as part of all future planning activities.

C.5 Troubled PHA.

(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Yes. Below are the goals, plans, and milestones exactly as set forth in the Agreement

OVERARCHING RECOVERY GOALS

HAPGC is required to:

- **Correct all HUD-identified deficiencies** through implementation of the Agreement

Recovery Agreement - MD015 - V3...

- Improve PHAS performance by:
 - **At least 50% of the difference** between its failing PHAS score (18) and the score needed to remove the Troubled designation
 - **By the first PHAS assessment for fiscal years ending on or after June 30, 2024**
 - Achieve an **overall PHAS score of at least 60% of total points available**
 - **By the next sequential fiscal year PHAS assessment**

PERFORMANCE PLANS / REQUIRED ACTIONS

1. Increase Occupancy

HAPGC must:

- Increase low-rent public housing occupancy to **at least 95%**
- Calculated using:
 - Unit Months Leased (FDS line 11210)
 - Unit Months Available (FDS line 11190)
- Applicable to the **Fiscal Year Ending June 30, 2025**

2. Improve Physical Condition of Units

HAPGC must:

- Increase the **Physical Sub-Indicator (PASS)** score on the PHAS assessment
- To **at least 60%**
- **By June 30, 2025**

3. Improve Financial Performance

HAPGC must:

- **By February 28, 2025:**
 - Develop and implement internal procedures to ensure **timely submission of unaudited and audited financial statements** to HUD
 - Provide **training to the Board of Commissioners Finance Sub-Committee** on HUD financial reporting deadlines

4. Reposition Public Housing Inventory

HAPGC must:

- Remove Cottage City Towers from the public housing inventory through repositioning
- **Close the RAD PBV conversion transaction**
- **By September 30, 2025**

REPORTING MILESTONES

HAPGC must:

- Submit **Progress Reports:**
 - Beginning **30 days after execution of the Agreement**
 - **By the 5th of each month thereafter**
- Reports must describe activity status so HUD can monitor progress toward performance requirements