

# Proposed Revisions to HOC's Administrative Plan to the Housing Choice Voucher Program

Please note: Existing language is in **BLACK** and Proposed Changes are in **RED**

## Chapter 1

### STATEMENT OF POLICIES AND OBJECTIVES

#### INTRODUCTION

The Section 8 Program was enacted as part of the Housing and Community Development Act of 1974, which re-codified the U.S. Housing Act of 1937. The Act is amended from time to time, and its requirements, as they apply to the Section 8 Tenant-Based Assistance Program, are described in, and implemented throughout, this Administrative Plan. The Section 8 rental assistance programs are federally funded and administered for Montgomery County, Maryland by the Housing Opportunities Commission of Montgomery County, Maryland (HOC) through its Housing Resources Division.

Administration of the Section 8 Program and the functions and responsibilities of t HOC's staff are in compliance with the HOC's Personnel Policy and the U.S. Department of Housing and Urban Development's (HUD) Section 8 Regulations as well as all other relevant Federal, State and local fair housing laws and regulations.

#### Jurisdiction

HOC's jurisdiction in which to administer the Section 8 Housing Choice Voucher (HCV) Program is the county of Montgomery in the state of Maryland, exclusive of the City of Rockville.

#### A. MISSION STATEMENT OF THE HOUSING OPPORTUNITIES COMMISSION

HOC currently operates a Section 8 Existing Program funded by HUD. The program began in February 1976 when HOC and HUD entered into an Annual Contributions Contract (ACC) for the administration of Housing Assistance Payments to assist 330 families. Since that time, HOC's successful operation of the program resulted in subsequent funding to HOC from HUD through allocation by a fair share formula and by awarding of funds through a competitive process resulting in funds supporting payments to many additional families. HOC's Commission, which oversees the operation of the Section 8 Program, approves the use of the administrative fee reserve.

HOC's mission for the Section 8 Existing Program is to provide rent subsidies and affordable housing choices to qualified families while simultaneously providing customer friendly service to applicants, participating families, landlords, and the community at large. The emphasis in this program is to enable families of extremely and very-low incomes to seek the housing of their choice in the private market, and to receive the rental assistance necessary to obtain that housing. The Section 8 program provides Housing Assistance Payments (HAP) as determined in

accordance with schedules and criteria established by HUD. HAP funds are the difference between what an eligible family can afford to pay for housing, and the amount required to obtain decent housing in Montgomery County.

Beginning in 1979, HOC provided resident support services and assistance, as needed, to program participants to ensure that they are successful members of the community. Today, HOC's Resident Services Division's Section 8 Counselors work to reduce the number of serious disturbance complaints from the community about Section 8 households through increased outreach and education of residents, timely response to complaints and increased Agency presence in locations where persistent problems exist. It is the policy of HOC and its employees to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment. HOC does not deny any family or individual the opportunity to apply for, or receive, assistance under the Section 8 HCV Program on the basis of race, color, sex, religion, creed, national or ethnic origin, age, family or marital status, handicap or disability, or sexual orientation.

**B. LOCAL GOALS [24 CFR 982.1]**

**HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.**

  X   HOC Goal: Expand the supply of assisted housing

Objectives:

  X   Apply for additional rental vouchers

     Reduce public housing vacancies

  X   Leverage private or other public funds to create additional housing opportunities

  X   Acquire or build units or developments

  X   HOC Goal: Improve the quality of assisted housing

Objectives:

     Improve public housing management (PHAS score)

  X   Improve voucher management (SEMAP score)

  X   Increase customer satisfaction

  X   Concentrate on efforts to improve specific management functions (e.g., public housing finance; voucher unit inspections)

X HOC Goal: Increase assisted housing choices

Objectives:

- X Provide voucher mobility counseling
- X Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards
- Implement voucher homeownership program
- X Implement public housing or other homeownership programs
- Implement public housing site-based wait lists
- X Convert public housing to Project-Based Section 8
- Other: (list below)
- Other HOC Goal/s and objectives: (List below)

**HUD Strategic Goal: Improve community quality of life and economic vitality**

X HOC Goal: Provide an improved living environment

Objectives:

- Implement measures to de-concentrate poverty by bringing higher income public housing households into lower income developments.
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments.
- Implement public housing security improvements.
- X Designate developments or buildings for particular resident groups (elderly, persons with disabilities.)
- Other: (list below)
- Other HOC Goal/s and objectives: (List below)

**HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals**

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

Objectives:

Increase the number and percentage of employed persons in assisted families.

Provide or attract supportive services to improve assistance recipients employability.

Provide or attract supportive services to increase independence for the elderly or families with disabilities.

Other: (list below)

Other HOC Goal/s and objectives: (List below)

### **HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans**

HOC Goal: Ensure equal opportunity and affirmatively further fair housing. Objectives:

Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability.

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.

Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

Other: (list below)

In addition, HOC has the following goals for the HCV program:

- *To assist the local economy by increasing the occupancy rate and the amount of money flowing into the community.*
- *To encourage self-sufficiency of participant families and assist in the expansion of family opportunities which address educational, socioeconomic, recreational, and other human service needs.*
- *To create positive public awareness and expand the level of family, owner, and community support in accomplishing HOC's mission.*

- *To attain and maintain a high level of standards and professionalism in HOC's day-to-day management of all program components.*
- *To administer an efficient, high-performing agency through continuous improvement of HOC's support systems and commitment to HOC's employees and their development.*

**C. PURPOSE OF THE PLAN** [24 CFR 982.54]

The purpose of the Administrative Plan is to establish policies for carrying out the HCV program in a manner consistent with HUD requirements and the local goals and objectives contained in the Public Housing Agency (PHA) Plan. The Housing Choice Voucher Program is implemented as of October 1, 1999. HOC is responsible for complying with all changes in HUD regulations pertaining to these programs. If such changes conflict with this Plan, HUD regulations have precedence. The original Administrative Plan and any changes are approved by HOC's Board of Commissioners, the pertinent sections included in the PHA Plan, and a copy provided to HUD.

Applicable regulations include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 982: Section 8 Tenant-Based Assistance

**D. ADMINISTRATIVE FEE RESERVE** [24 CFR 982.54(d)(22)]

HOC will not make expenditures from the Administrative Reserve (Operating Reserve) for other housing purposes without the prior approval of HOC's Board of Commissioners.

**E. RULES AND REGULATIONS** [24 CFR 982.52]

This Administrative Plan is set forth to define HOC's local policies for the operation of the HCV program in the context of Federal laws and regulations. All issues related to Section 8 that are not addressed in this document are governed by such Federal regulations, HUD Memos, Notices and guidelines, or other applicable laws.

**F. TERMINOLOGY**

The Housing Opportunities Commission of Montgomery County (HOC) is often referred to as "PHA" or "Housing Authority" throughout this document.

"Family" is used interchangeably with "Applicant" or "Participant" and can refer to a single person family.

"Tenant" is used to refer to participants in terms of their relation to landlords.

"Landlord" and "owner" are used interchangeably.

"Disability" is used where "handicap" was formerly used.

"Non-Citizen Rule" refers to the regulation effective June 19, 1995 restricting assistance to U.S. citizens and eligible immigrants.

The Section 8 programs are also known as the Regular Tenancy Certificate, Over-FMR Tenancy (OFTO) and Voucher Programs. The Voucher Choice program refers to the merged program effective as of August 12, 1999.

"HQS" means the Housing Quality Standards required by regulations as enhanced by HOC.

"Failure to Provide" refers to all requirements in the first Family Obligation. See the "Denial or Termination of Assistance" chapter in this Administrative Plan.

See the Glossary for other terminology.

#### **G. FAIR HOUSING POLICY** [24 CFR 982.54(d)(6)]

It is the policy of HOC to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment.

HOC will not deny any family or individual the equal opportunity to apply for, or receive, assistance under the Section 8 Programs on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial or marital status, handicap or disability, or sexual orientation.

To further its commitment to full compliance with applicable Civil Rights laws, HOC provides Federal/ State/ local information, including the toll free number for the Housing Discrimination Hotline: 1-800-669-9777, to voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information is available during the family briefing session, and all applicable fair housing information and discrimination complaint forms are a part of the Voucher holder's briefing packet, and available upon request at the front desk.

In an effort to affirmatively further fair housing, HOC will:

1. Advertise widely in the community for the coordinator position or positions;
2. Market the program to all eligible persons including persons with disabilities and persons with limited English proficiency (LEP);
3. Create buildings and communication options that facilitate applications and service delivery accessible to persons with disabilities;
4. Provide fair housing counseling services or referrals to fair housing agencies:

5. Inform participants of how to file a fair housing complaint; and
6. Recruit landlords and service providers in areas that expand housing choice for homeownership participants and housing mobility.

All HOC staff are required to attend fair housing training to inform them of the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as a part of HOC's overall commitment to quality customer service. Fair housing posters are posted throughout HOC's offices, including in the lobby and interview rooms. The equal housing opportunity logo is used on all outreach materials. Staff attends local fair housing update training sponsored by HUD and other local organizations to keep current with new fair housing developments.

Except as otherwise provided in the Code of Federal Regulations at 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because HOC's facilities are inaccessible to, or unusable by, persons with disabilities. Posters and housing information are displayed in locations throughout HOC's office in such a manner as to be easily readable from a wheelchair. HOC's offices are accessible to people with disabilities. Accessibility for the hearing impaired is provided by the Maryland Relay service.

#### **H. REASONABLE ACCOMMODATIONS POLICY** [24 CFR 700.245(c)(3)]

It is the policy of HOC to be service-directed in the administration of its housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services to families.

A participant with a disability must first ask for a specific change to a policy or practice as an accommodation of his/her disability before HOC will treat a person differently than anyone else. HOC's policies and practices are designed to provide assurances that persons with disabilities are given reasonable accommodations, upon request, so that they may fully access and utilize the housing program and any related services. The availability of requesting an accommodation is made known by including notices of the availability of disability accommodations on HOC forms and letters. This policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities. This policy is applicable to all situations described in this Administrative Plan including when a family initiates contact with HOC, when HOC initiates contact with a family (including when a family applies), and when HOC schedules or reschedules appointments of any kind.

Eligibility to request a reasonable accommodation requires that the requester must first certify (if apparent) or verify (if not apparent) that they are a person with a disability under the following Americans with Disabilities Act (ADA) definition:

A physical or mental impairment that substantially limits one or more of the major life activities of an individual;

A record of such impairment; or

Being regarded as having such an impairment.

*Note: This is not the same as HUD's definition used for purposes of determining allowances.*

Rehabilitated former drug users and alcoholics are covered under the ADA. However, a current drug user is not covered. In accordance with 24 CFR 5.403(a), individuals are not considered disabled for eligibility purposes solely on the basis of any drug or alcohol dependence. Individuals whose drug or alcohol addiction is a material factor to their disability are excluded from the definition. Individuals are considered disabled if disabling mental and physical limitations would persist if drug or alcohol abuse discontinued.

Once the person's status as a qualified person with a disability is confirmed, HOC requires that a reliable, knowledgeable health provider, such as a doctor, social worker, or caseworker competent to make the assessment, provide written verification that the person needs the specific accommodation due to his/her disability and that the change is required for the person to have equal access to the housing program.

If HOC finds that the requested accommodation creates an undue administrative or financial burden for the Agency, HOC will either deny the request and/or present an alternative accommodation that still meets the needs of the person with disabilities.

An undue administrative burden is one that requires a fundamental alteration of the essential functions of HOC (i.e., waiving a family obligation).

An undue financial burden is one that when considering the available resources of the Agency as a whole, the requested accommodation would pose a severe financial hardship on HOC.

HOC provides a written decision to the person requesting the accommodation within a reasonable time. If a person is denied their requested accommodation or feels that the alternative accommodation provided is inadequate, they may request an informal hearing to appeal HOC's decision.

Reasonable accommodations are made for a person with a disability that requires an advocate or accessible offices. A designee is allowed to provide some information, but only with the permission of the person with the disability.

Upon request, all HOC mailings are available in an accessible format, as a reasonable accommodation for customers with disabilities.

### **Verification of Disability**



HOC verifies disabilities based on the definitions in the Fair Housing Amendments Act of 1988, Section 504 of the 1973 Rehabilitation Act, and the Americans with Disabilities Act of 1990.

## **Outreach**

Outreach efforts include notification of non-profits and County agencies, as well as all other media and agencies listed in HOC's Administrative Plan regarding public notices (see section discussing the wait list in the "Applying for Admission" chapter of this Administrative Plan.)

## **Applying for Admission**

All persons who wish to apply for any of HOC's programs must submit a pre-application as indicated in the "Applying for Admission" chapter of this Administrative Plan. Upon request, applications are available in an accessible format to assist people with disabilities.

Upon request, HOC will mail application and admissions information in an accessible format to customers with disabilities.

The full HCV program application is completed at the eligibility appointment in the applicant's own handwriting, unless assistance is needed, or a request for a reasonable accommodation is requested by a person with a disability. Applicants are interviewed by HOC staff to review the information on the full program application form. Verification of disability as it relates to Section 504, the Fair Housing Act, or the ADA are requested as reasonable accommodations at this time. The full application also includes questions asking all applicants whether any reasonable accommodations are necessary.

## **I. TRANSLATION OF DOCUMENTS**

HOC has bilingual staff available to assist families with Limited English Proficiency (LEP) with interpretation and translation services.

In determining whether it is feasible to provide translation of documents written in English into other languages, HOC considers the following factors:

- Number of applicants and participants in the jurisdiction who do not speak English and instead speak a specific other language;
- Estimated cost to HOC per customer of translation of English written documents into the other language;
- Availability of local organizations to provide translation services to LEP families;
- Availability of bi-lingual staff at HOC to provide translation for LEP families.

## **J. MANAGEMENT ASSESSMENT OBJECTIVES**

HOC operates its housing assistance program with efficiency and can demonstrate to HUD auditors that HOC is using its resources in a manner that reflects its commitment to quality and service. Accordingly, HOC policies and practices are consistent with the areas of measurement for the following HUD Section Eight Management Assessment Program (SEMAP) indicators:

1. Selection from the Wait List
2. Reasonable Rent
3. Determination of Adjusted Income
4. Utility Allowance Schedule
5. HQS Quality Control Inspections
6. HQS Enforcement
7. Expanding Housing Opportunities
8. FMR/exception rent & Payment Standards
9. Annual Re-examinations
10. Correct Tenant Rent Calculations
11. Pre-Contract HQS Inspections
12. Annual HQS Inspections
13. Lease-up
14. Family Self-Sufficiency Enrollment and Escrow Account Balances

Bonus Indicator: Deconcentration of poverty and minorities

HOC supervisors, Compliance Specialists, or another qualified person other than the person who performed the work, as required by HUD, conducts quality control reviews on the following SEMAP factors:

- Selection from the wait list
- Rent reasonableness
- Determination of adjusted income
- HQS Enforcement
- HQS Quality Control Inspections

The annual sample of files and records is drawn in an unbiased manner, leaving a clear audit trail.

The minimum sample size for review of SEMAP's rating factors relate directly to each factor.

## **K. RECORDS FOR MONITORING HOC's PERFORMANCE**

To demonstrate compliance with HUD and other pertinent regulations, HOC maintains records, reports, and other documentation for a time that is in accordance with HUD requirements and HOC's Document Retention Guideline. Records are maintained in a manner that allows an

auditor, housing professional, or other interested party to follow, monitor, and/or assess HOC's operational procedures objectively, with accuracy, and in accordance with SEMAP requirements and other internal supervisory audits.

#### **L. PRIVACY RIGHTS** [24 CFR 982.551]

Applicants and participants, including all adults in their households, are required to sign the HUD 9886 Authorization for Release of Information. This document incorporates the Federal Privacy Act Statement and describes the conditions under which HUD and/or HOC are permitted to release family information.

HOC's policy regarding release of information is in accordance with State and local laws that may restrict the release of family information.

All information which would lead one to determine the nature and/or severity of a person's disability is not released except on an "as needed" basis in cases where a disability-related accommodation is under consideration by HOC staff. All requests for access and granting of accommodations based on this information are reviewed for approval by HOC's Fair Housing and Equal Opportunity (FHEO) Officer.

HOC's practices and procedures are designed to safeguard the privacy of applicants and program participants. All applicant and participant files are stored in a secure location that is only accessible by authorized staff.

HOC staff will not discuss family information contained in files unless there is a business reason to do so. Inappropriate discussion of family information, or improper disclosure of family information by staff, will result in severe disciplinary action.

#### **M. FAMILY OUTREACH** [24 CFR 982.153(b)(1)]

HOC publicizes and disseminates information to make known the availability of housing assistance and related services for very low-income families on a regular basis using newspapers of general circulation, minority media, and other suitable means.

HOC has multi-lingual staff to assist Limited English Proficiency (LEP) families. Other local non-profit organizations are available, upon request by a customer family, to explain untranslated documents or to assist in verbal translation for other languages. HOC provides information at its voucher briefing sessions to all selected voucher applicants describing Federal, State, and local laws regarding housing discrimination. At its briefing sessions, HOC also provides a copy of HUD's housing discrimination complaint form, which is available for HOC customers to use if they believe they are victims of discrimination.

In order to reach individuals who cannot, or may not, read the newspapers, HOC posts information on its website and at its offices. HOC also distributes fact sheets to the local broadcasting media, and initiates personal contact with members of the news media and community service personnel. HOC may also utilize public service announcements. HOC

communicates the status of housing availability to other service providers in the County and advises them of housing eligibility factors, HOC guidelines, and how to guide potential applicants to HOC's wait list. All of these efforts help HOC's partners to make informed and proper referrals to HOC for housing assistance.

In the tenant-based Housing Choice Voucher (HCV) program, eligible families are responsible for finding units and negotiating lease agreements with private market owners. HOC provides program training and assistance to help guide eligible families in their search for a unit. It is important to note that the legislative intent of the HCV program is to place the responsibility for finding and leasing-up in a unit on the individual family. This responsibility reduces the dependency of families on local housing authorities, and provides families with greater freedom of choice as to type, size, and location of their homes. It is, therefore, HOC's intent to provide the greatest amount of support and assistance to families within the parameters of encouraging families' self-sufficiency and independence. However, no family participating in any of the programs described in this Administrative Plan may simultaneously receive the benefit of more than one of the following: Certificate, Voucher, other Section 8 housing assistance, Section 101 rent supplements, Section 236 Rental Assistance Payments, tenant-based assistance under the HOME Program, Public or Indian housing assistance, any local or State rental subsidy, or other duplicate subsidy as determined by HUD.

In order to administer the HCV program effectively, both in terms of efficient management and attainment of the program's goals, HOC developed this comprehensive Administrative Plan. The Plan allows for an administration sufficiently flexible to provide services and support to those in leased units, as well as provide for leasing of additional units. HOC is responsible for complying with all changes in HUD regulations pertaining to these programs and updates this Administrative Plan on an as-needed basis in order to remain up-to-date and compliant with any changes in Federal, State, or local regulations affecting the voucher program.

#### **N. OWNER OUTREACH** [24 CFR 982.54(d)(5), 982.153(b)(1)]

HOC makes a concerted effort to keep private owners informed of legislative changes in the tenant-based voucher program, which are designed to make the program more attractive to owners. This includes informing participant owners of applicable legislative changes in program requirements.

HOC encourages owners of decent, safe, and sanitary housing units to lease their units to Section 8 families.

HOC conducts periodic meetings with participating owners to improve owner relations, provide continuing education, and recruit new owners.

HOC maintains a list of units available for the Section 8 Program and updates this list at least monthly. When listings from owners are received, they are compiled by HOC staff by bedroom size.

HOC maintains lists of available housing submitted by owners in many neighborhoods within HOC's jurisdiction to ensure greater mobility and housing choice to very low-income households. The lists of available units are provided at voucher briefings.

HOC actively recruits property owners with units located outside of areas of minority and poverty concentration. HOC also applies for exception payment standards on a case-by-case basis if HOC jurisdiction.

### **O. The Violence Against Women Act of 2013 (VAWA) [24 CFR5.2003]**

It is the policy of the HOC to comply fully with all federal, state, and local laws and with the rules and regulations within VAWA. Notwithstanding its title, VAWA is gender neutral, and protects applicants who qualify for assistance and program participants from eviction, denial of housing assistance, or termination from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking.

HOC maintains consistency with HUD's nondiscrimination and equal opportunity requirements and victims will not face discrimination against on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, gender identity, marital status, or age.

Guests, unassisted members, and live-in aides of the family are ineligible for VAWA protections, as VAWA protections are only available to program participants.

Unassisted members who are also on the lease may qualify by way of the lease for VAWA protections [24 CFR 5.2005 (c)].

As a reasonable accommodation, a participant may request VAWA protections based on the grounds that the live-in aide is a victim of domestic violence, dating violence, sexual assault, or stalking.

### **VAWA Notification Requirements**

HOC provides applicants and participants with the HUD approved *Notice of Occupancy Rights Under the Violence Against Women Act* form (Form HUD-5380). This form explains the VAWA protections, including the right to confidentiality, documentation, and any limitations on those protections.

HOC also provides applicants and participants with the *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation* form (Form HUD 5382). The VAWA customer may complete this form to report the incident of domestic violence, dating violence, sexual assault, or stalking. However, this form is optional. A third-party may submit the form on behalf of the applicant or participant, or submit one of the following types of third-party documents:

1. A document, which the customer has signed, along with a signature from a “professional” from whom the customer has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of the abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meets the VAWA definition in HUD’s regulations at CFR 5.2003. Examples of “Professionals” include:
  - An employee;
  - Agent, or volunteer of a victim service provider;
  - An attorney; or
  - A medical or mental health professional.
2. A record from a federal, state, or local law enforcement agency, court, or an administrative agency; or
3. At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

### **Violence Against Women Act Policy**

HOC’s Violence Against Women Act Policy (VAWA Policy) is applicable to the administration of all federally subsidized Public Housing and Section 8 rental assistance under the United States Housing Act of 1937 (42 U.S.C. §1437 et seq.), and includes other housing programs not administered by the Housing Choice Voucher program. The VAWA Policy includes, but is not limited to, the following additional program requirements:

- Definitions;
- Termination of tenancy or assistance;
- Verification requirements;
- Confidentiality;
- Conditions for an extension for submitting documents;
- Emergency Transfer Plan;
- Emergency Transfer Request form;
- Portability;
- Project-Based Voucher transfer policies; and
- Contact information for local victim advocacy groups or service providers.

### **P. CONDUCTING BUSINESS IN ACCORDANCE WITH CORE VALUES AND ETHICAL STANDARDS**

The Housing Opportunities Commission of Montgomery County (HOC) and its staff are governed by the provisions of the Montgomery County Ethics Law; Chapter 19A of the Montgomery County Code. Additionally, HOC’s own Ethics Policies and Procedures provide further requirements regarding ethical conduct to which HOC personnel must adhere in their performance of HOC activities and all interactions with HOC customers.