

Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.																								
A.1	<p>PHA Name: <u>Cincinnati Metropolitan Housing Authority</u> PHA Code: <u>OH004</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2018</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>5,346</u> Number of Housing Choice Vouchers (HCVs) <u>11,728</u> Total Combined Units/Vouchers <u>17,074</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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B.	Annual Plan Elements																								

B.1 Revision of PHA Plan Elements.

(A) Have the following PHA plan elements been revised by the PHA?

Y N

- ☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs
☒ ☐ De-concentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☒ ☐ Financial Resources.
☐ ☒ Rent Determination.
☒ ☐ Operation and Management.
☐ ☒ Grievance Procedures.
☐ ☒ Homeownership Programs.
☐ ☒ Community Service and Self-Sufficiency Programs.
☐ ☒ Safety and Crime Prevention.
☒ ☐ Pet Policy.
☒ ☐ Asset Management.
☒ ☐ Substantial Deviation.
☒ ☐ Significant Amendment/Modification

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

STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS:**Housing Needs of Families on the PHA's Waiting Lists**

Waiting list type: (select one)

- ☒ Section 8 tenant-based assistance
☐ Public Housing
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)
If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	11,380		1004
Extremely low income <=30% AMI	9,904	87.03%	
Very low income (>30% but <=50% AMI)	1,196	10.51%	
Low income (>50% but <80% AMI)	260	2.28%	
Families with children	4,331	38.06%	
Elderly families	601	5.28%	
Families with Disabilities	2,262	19.88%	
Race/ethnicity: White	1,443	12.68%	
Race/ethnicity: Black	9,851	86.56%	
Race/ethnicity: Native American	40	.35%	
Race/ethnicity: Asian	23	.20%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	9,026	79.31%	
2 BR	1,270	11.16%	
3 BR	734	6.45%	
4 BR	220	1.93%	
5 BR	89	.78%	
5+ BR	41	.36%	

Is the waiting list closed (select one)? Yes

If yes:

How long has it been closed (# of months)? January 2017 (11)

Does the PHA expect to reopen the list in the PHA Plan year? ☒ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☒ Yes (e.g., specific bedroom sizes may be left open)

**Referrals will be accepted from CMHA Special Admissions, CMHA's Asset Management/LIPH, DHAP, HUD funded FUP, Youths Aging Out of Foster Care, LADD, HUD VASH, Strategies to End Homelessness, CILO and Families referred from the regardless of whether a family is on the PHA regular voucher wait list, regardless of whether the regular PHA voucher wait list is open or closed, consistent with 24 CFR 982.206 (c).

Housing Needs of Families on the PHA's Waiting Lists

Waiting list type: (select one)

- ☐ Section 8 tenant-based assistance
☒ Public Housing
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)
If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	11,360		912
Extremely low income <=30% AMI	9904	87.18%	
Very low income (>30% but <=50% AMI)	1,196	10.53%	
Low income (>50% but <80% AMI)	260	2.29%	
Families with children	4,322	38%	
Elderly families	16	.001%	
Families with Disabilities	352	.03%	
Race/ethnicity: White	586	.05%	
Race/ethnicity: Black	3,700	33%	
Race/ethnicity: Native American	17	01%	
Race/ethnicity: Asian	8	007%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR (Includes 21-0 BR)	6,724	59.19%	
2 BR	3,313	29.17%	
3 BR	923	8.13%	
4 BR	256	2.25%	
5 BR	102	1.02%	
5+ BR	42	0.24%	

Is the waiting list closed (select one)? ☒ No ☐ Yes

If yes:

How long has it been closed (# of months)?

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes (e.g., specific bedroom sizes may be left open)

DE-CONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION AND ADMISSIONS:

**HOUSING CHOICE VOUCHER [HCV] PROGRAM
Summary of Proposed Changes to the 2018-2019 Administrative Plan**

1. Chapter 4 – Part B LOCAL PREFERENCES [24 CFR 982.207]

Corrected value of points for Displaced preference for voucher families who have been terminated from the program as a result of insufficient funding. from 80 to 85 points

Added Referrals Preference for Asset Management/LIPH's families that are relocating as a result of RAD conversion. **80 points

2. Chapter 4 – Part H SPECIAL PROGRAMS

Language added regarding Wait List Management for HCV Special Programs

Deleted Choice Mobility Wait List and combined with RAD to Tenant Based/Assistance:

RAD to Tenant Based Assistance/Choice Mobility Wait List:

Residents under the RAD PBRA provisions electing to move with a tenant based voucher, within the later of: (a) 24 months from date of execution of the HAP or (b) 24 months after the move-in date. Families will be issued vouchers in a ratio of up to 5 requests pulled per 100 families drawn from the HCV Tenant Based wait list.

3. Chapter 11 – Complaint Inspection Part A Request For Tenancy Approval [24 CFR 982.302, 982.305(b)]

Language was removed that stated the inspection within 15 days of notification of the situation for non-emergency items.

If at any time CMHA is notified that the unit does not meet Housing Quality Standards, CMHA will conduct an inspection of the situation for non-emergency items.

Added Language that would allow CMHA the ability to charge owners a reasonable fee for re-inspections.

Further defined Emergency Repair items to include Fires that leave the unit uninhabitable, gas leaks, electrical hazards that can result in shock or fire.

The following items are considered of an emergency nature and must be corrected by the owner or tenant (whoever is responsible) within 24 hours of notice by the inspector:

- Sewage backup.
- Utilities are not on (i.e. electric, gas, and/or water).
- Smoke detector missing, damaged, or missing battery.
- Electrical outlets and light switch covers that are missing or cracked.
- GFCI outlets that do not function properly (open grounds on GFCI are acceptable).
- Circuit breaker boxes with open slot or open knock-out hole.
- Junction boxes missing cover or open knock-outs.
- Gas stoves that do not light from the pilot.
- Improper flue connection for furnace or water heater.
- No heat when outside temperature is below 40°.
- Flooding
- Fires that leave the unit uninhabitable
- Gas leaks
- Electrical Hazards that can result in shock or fire.

4. **Chapter 16 Denial Termination of Assistance**

Language changed regarding termination of assistance for program participants from:

Arrested, convicted, or evicted for drug-related or violent criminal activity during participation in the program, **within the last three years**, prior to date of the notice to terminate assistance.

To:

Arrested, convicted, or evicted for drug-related or violent criminal activity during participation in the program.

5. **Chapter 20 Special Programs**

Added New Regulatory language regarding PBV assistance CAP.

GENERAL PROJECT BASED VOUCHER CAP

The General PBV Cap calculation of 20 percent is the maximum limit of 20 percent of unit allocation or 20 percent of funding allocation. This is the statutory maximum. CMHA may choose to use up to 20 percent of its authorized Housing Choice Voucher units for the PBV program.

Added Language to clarify final selection process for PBV awards

Final Selection Notification

CMHA will post in a broad public notice the final selection of owners to provide housing under the PBV program. The public notice procedures will include publication of the general notice in a local newspaper of general circulation. A period of no less than 15 days will be offered for public comment.

Added both required and clarifying language for PBV Process

Other PBV Criteria

Approval of all PBV contracts will also be subject to the following CMHA rules and/or HUD regulations:

Compliance with HUD Federal Register Notice: Project-Based Voucher Program; Final Rule dated Thursday, October 13, 2005 and all other applicable regulations located at 24 CFR Part 983.

Compliance with HUD Housing Quality Standards (HQS) as specified in Chapter 11 of the Housing Choice Voucher Administrative Plan.

All applications will be ranked according to specific criteria, based on CMHA's housing and local goals.

All assisted units will be inspected by CMHA on a biannual basis to verify continued compliance with HUD's Housing Quality Standards.

CMHA will not award Site-Based Assistance for shared housing, transitional housing, manufactured home space rental, or the homeownership option. Additionally, CMHA will not award Site-Based Assistance for properties that are already subsidized under the following programs: Asset Management, any form of Section 8, any local or state rent subsidy, Section 236, Section 521, Section 202, Section 202 Loan, Section 811 or Section 101 Rent Supplement.

Owner experience and capability to build or rehabilitate housing as identified in the RFP.

CMHA reserves the right on a case-by-case basis to identify the need for any special features depending on the intended occupancy of the PBV property. Some examples may include but are not limited to, on-site space for the provisions of services, play areas, etc.

Tenant Selection

CMHA will maintain separate wait lists for the PBV and HCV Programs. Furthermore, CMHA will maintain a separate wait list for each PBV-assisted property. All PBV program wait lists will remain open continuously until CMHA determines that enough applicants have been collected to fill the vacancies projected for a one-year period. PBV applicants will be drawn from the specific PBV wait list in date and time order.

An applicant who reaches the top of the PBV wait list will be offered the first available unit. If the applicant rejects the unit, without good cause, they will be withdrawn from the PBV wait list and will have to reapply when the wait list is open for applications. In cases where an applicant rejected the proposed unit due to reasonable accommodation, CMHA will refer the matter to the Section 504 Coordinator for determination of a future offer.

The owner is responsible for adopting written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to perform their lease obligations. An owner must promptly notify any rejected applicant in writing of the grounds for any rejection.

Leasing of PBV contract units [24 CFR 983.253]

During the term of the HAP Contract, the owner must only lease contract units to eligible families selected and referred by CMHA from the wait list. The contract unit leased to each family must be appropriate for the size of the family under CMHA's subsidy standards. An applicant family will not be approved for a wrong-sized unit.

The owner is responsible for adopting written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to perform their lease obligations. An owner must promptly notify any rejected applicant in writing of the grounds for any rejection.

CMHA subsidy standards as outlined in Chapter 9 of the Administrative Plan will determine the appropriate unit size for family size and composition. If a family is in a wrong-size unit or a unit with accessible features that the family does not require, CMHA will notify the family and owner of the determination and offer the family an opportunity to receive continued housing assistance in another project based unit in the same building or another building within the project based contract with the owner. If the family does not accept the offer, does not move out of the wrong-size or accessible unit or both within 60 days of notification by CMHA, CMHA will terminate the housing assistance payments for the wrong-size or accessible unit.

If after tenancy begins, a family is in a wrong-sized unit or a unit with accessible features that the family does not require, CMHA will notify the family and owner of the determination and offer the family an opportunity to receive continued housing assistance in another project based unit in the same building or another building within the project based contract with the owner.

If the family does not accept the first available unit offered and does not move out of the wrong-size or accessible unit within 60 days of notification by CMHA, CMHA will terminate the housing assistance payments for the wrong-size or accessible unit.

The owner is responsible for adopting written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families. The tenant selection procedures should be reasonably related to program eligibility and promote an applicant's ability to perform their lease obligations. An owner must promptly notify any rejected applicant in writing of the grounds for any rejection.

Preferences for PBV Wait List [24 CFR 983.251(d)]

There are no preferences for PBV Wait Lists. Applicants are selected based on date and time of submission of referral.

Regulations require that CMHA give an absolute preference to families living in contract units in existing housing at the time a proposal for project-basing is selected. Such families are defined as in-place families.

Cap on number of PBV units in each building [24 CFR 983.56]

The Income Mixing Cap on Project Based Voucher Projects is to be the greater of 25 units in a project or 25% of units in a project.

An exception to the 25 percent per building cap may be made when PBV units are not counted against cap, as follows:

- Units in a single-family building;
- Units that offer supportive services

Term of The Project Based Vouchers Contract [24 CFR 983.205]

- CMHA may allow for an initial PBV contract of up to 20 years
- If HAP contract is still in initial term, then the initial term may be extended to 20 years by mutual consent
- CMHA may extend that term for an additional 20 years
- PHAs may provide for multiple extensions, but cumulatively the extensions should not exceed 20 years
- Upon expiration of a contract that is not extended, a family living at the property is entitled to a tenant-based voucher
- These families are not new admissions are not subject to income-based eligibility requirements

Additional Units

- CMHA and owners may amend HAP contracts to add additional PBV units without having to fulfill the selection requirements

- The additional PBV units are still subject to program cap and individual project cap

Relocation Assistance for Displaced Persons due to Project-Based Vouchers:

Persons displaced as a result of a Project-Based Voucher Development will be eligible for Relocation Assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR part 24. Relocation funds may be paid with funds provided by the owner, or with local public funds, or with funds available from other sources. Relocation costs may not be paid from voucher program funds.

CMHA's Responsibility:

CMHA will require the owner of any PBV proposal to submit a copy of its relocation plan with its proposal documents. CMHA will require such owners to comply with The URA and 49 CFR part 24.

Replacement Units:

The Owner may relocate a resident to another unit within the related PBV development or other comparable replacement units that Owner has available. Other subsidized units may be utilized as replacement units as long as they are in conformance with other applicable URA rules and regulations. Additionally, at the sole discretion of CMHA, a displaced resident may receive preference on CMHA's Voucher Management Waitlist and/or Asset Management Waitlist.

Non-Compliance

An owner's noncompliance with the requirements of the URA and 49 CFR Part 24 is considered good cause to terminate the Agreement to Enter into Housing Assistance Payment Contract and/or the Housing Assistance Payment Contract.

Terms

"Excepted units" means units in a multifamily building that are specifically made available for qualifying families.

"Qualifying families" means: Elderly or disabled families; or

Families receiving who would qualify for supportive services.

It is not necessary that the services be provided at or by the project, if they are approved services. To qualify, a family must have at least one member who would qualify for one supportive service. If a family at the time of initial tenancy is receiving, and while the resident of an excepted unit has received, FSS supportive services or any other supportive services as defined in CMHA's administrative plan, and successfully completes the FSS contract of participation or the supportive services requirement, the unit will continue to count as an excepted unit for as long as the family resides in the unit. Also, at the time of initial lease execution between the family and the owner, the family and CMHA must sign a statement of family responsibility.

Set-aside for qualifying families

In leasing units in a multifamily building pursuant to the PBV HAP, the owner must set aside the number of excepted units made available for occupancy by qualifying families.

CMHA will refer only qualifying families for occupancy of excepted units.

Additional local requirements promoting partially assisted buildings

CMHA may establish local requirements designed to promote PBV assistance in partially assisted buildings. For example, CMHA may:

Establish a per-building cap on the number of units that will receive PBV assistance or other project-based assistance in a multifamily building containing excepted units or in a single-family building,

Determine not to provide PBV assistance for excepted units, or Establish a per-project cap of less than 25 percent.

Description of supportive services

Supportive housing services include but are not necessarily limited to:

- A private apartment;
- A service coordinator to help residents arrange for services;
- Access to support services 24 hours a day, as needed; or case management and support services;
- Personal care services;
- Housekeeping and laundry assistance;

- Grocery shopping;
- Transportation;
- Social activities;
- Medication reminders and assistance;
- Companions;
- Help with chores;
- Personal finance and household budget counseling;
- Access education, training, and/or job counseling; or
- On-site day care to enable parents to work or attend school.

Tenant Screening [24 CFR 982.255]

CMHA has no responsibility or liability to the owner or any other person for the family's behavior or suitability for tenancy. CMHA does not screen PBV applicants for family behavior or suitability for tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. An owner may consider a family's background with respect to such factors as:

Payment of rent and utility bills; Caring for a unit and premises;

Respecting the rights of other residents to the peaceful enjoyment of their housing;

Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others; and Compliance with other essential conditions of tenancy.

Upon written request, CMHA will provide all owners with the following applicant information (if known):

The family's current and prior address, as shown in CMHA's records, and

The name and address of the landlord at the family's current and any prior address.

CMHA will provide the family with a written copy of CMHA's policy on providing information to owners.

The protections for victims of domestic violence, dating violence, sexual assault, and stalking in 25 CFR, part 5, subpart L apply to PBV tenant screening.

Vacancies [24 CFR 983.254]

The owner must promptly notify CMHA of any vacancy or expected vacancy in a contract unit. After receiving the owner's notice, CMHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies.

CMHA and the owner must make reasonable good faith efforts to minimize the likelihood and length of any vacancies. In the event that any contract units have been vacant for a period of 120 or more days since the owner notice of vacancy, CMHA may give notice to the owner amending the HAP contract to reduce the number of contract units by subtracting the number of contract units (by number of bedrooms) that have been vacant for such period.

PBV Family's Right to Move [24 CFR 983.260]

The PBV Family may terminate the assisted lease at any time after the first year of occupancy. The family must give the owner advance written notice of intent to vacate (with a copy to CMHA) in accordance with the lease.

If the family has elected to terminate the lease in this manner, CMHA must offer the family the opportunity for continued tenant-based rental assistance in the form of assistance under the Housing Choice Voucher program or other comparable tenant-based rental assistance.

Before providing notice to terminate the lease, a family must contact CMHA to request comparable tenant-based rental assistance if the family wishes to move with continued assistance. CMHA will maintain a separate wait list for families electing to move from the project based unit to obtain tenant based assistance as a participant of the HCV program.

Requests will be maintained according to date and time of voucher request from eligible households. Families will be issued vouchers in a ratio of up to 5 requests pulled per 100 families drawn from the HCV Tenant Based wait list.

If the family terminates the assisted lease before the end of one year, the family relinquishes the opportunity for continued tenant-based assistance.

Determining the Rent to Owner [24 CFR 983.301, 983.302]

The amount of the initial rent to owner is established at the beginning of the HAP contract term. When determining the initial rent to owner, CMHA will use the most recently published FMR in effect and the utility allowance schedule in effect at execution of the HAP contract. At its discretion, CMHA may use the amounts in effect at any time during the 30-day period immediately before the beginning date of the HAP contract.

The owner may request a redetermination of the rent to owner, in writing, 30 days prior to the annual anniversary of the HAP contract. CMHA must also re-determine the rent to owner when there is a five percent or greater increase in the published FMR.

When re-determining the rent to owner, CMHA will use the most recently published FMR, at its discretion, CMHA may use the amounts in effect at any time during the 30-day period immediately before the redetermination date. CMHA will use the utility allowance schedule in effect at the time of the redetermination.

If there is a decrease to the rent to owner, the PHA must decrease the rent regardless of whether the owner requested a rent adjustment, unless: CMHA has elected within the HAP Contract not to reduce rents below the initial level. The exception to this non-reduction would be if additional housing assistance was combined with the PBV assistance after the execution of the initial lease or a decrease in rent to owner is required based on changes in the allocation of the responsibility of utilities between the owner and the tenant.

CMHA will provide a written response to the owner of any contract rent adjustments. This notice constitutes an amendment to the HAP contract and a copy will be maintained with the Project Based Voucher contract file.

CMHA will not approve and the owner will not receive any increase of rent to owner until and unless the owner has complied with all requirements of the HAP contract, including compliance with HQS. The owner will not receive any retroactive increase of rent for any period of noncompliance with HQS.

Except for certain tax credit units, the rent to owner must not exceed the lowest of:

An amount determined by CMHA, not to exceed 110 percent of the applicable fair market rent for the unit bedroom size minus any utility allowance;

The reasonable rent; or

The rent requested by the owner.

For CMHA-owned units, the initial rent to owner and the annual redetermination of rent at the annual anniversary of the contract are determined by an independent entity approved by HUD in accordance with §983.59. CMHA will use the rent to owner established by the independent entity.

FINANCIAL RESOURCES:

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2015 grants)		
a) Public Housing Operating Fund	\$22,795,678	
b) Public Housing Capital Fund	\$11,865,485	
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$71,029,572	
d) Other Federal Grants (list below)		
e) Family Self Sufficiency	\$245,127	Section 8 Supportive Services
f) NSP2		NSP2 development
2. Prior Year Federal Grants (unobligated funds only) (list below)		
a) Regional Opportunity Counseling	\$0	Section 8 Tenant Based Assistance
b) Family Self Sufficiency	\$0	Section 8 Supportive Services

c) Resident Opportunity and Self-sufficiency Grants	\$0	Public Housing Supportive Services
d) Capital	\$12,759,567	Public Housing Capital Improvements
e) HOPE VI Revitalization	\$0	
3. Public Housing Dwelling Rental Income		
a) Rental Income	\$9,880,181	Public Housing Operations
4. Other income (list below)		
a) Excess Utilities		Public Housing Operations
b) Non-dwelling Rental	\$49,455	Other
c) Interest & Other Income	\$567,867	Other
5. Non-federal sources (list below)		
Total resources	\$129,752,103	

VAWA UPDATE:

During calendar year 2017, CMHA received **124** submissions for the transfers under the Violence Against Women Act (VAWA). All of these individuals/families sought a transfer from their present residence to another location in order to elude the predator. CMHA has developed its emergency transfer plan in response to the changes in VAWA this is an addendum to the ACOP. (See Emergency Transfer Plan at Administrative Category I Transfer.)

OPERATION AND MANAGEMENT:

Summary of Proposed Changes to the 2018-2019 Admissions and Occupancy Policy

6. **Section IV-Q – Sponsored Guest:** CMHA has expanded the definition of guests to include “Sponsored Guests” who with prior approval of CMHA are allowed to be in the CMHA household for a period in excess of the fourteen (14) days under the lease agreement.

SPONSORED GUEST:

- DEFINITION OF SPONSORED GUEST:** Sponsored Guests are individuals who are approved to reside in the CMHA household for a period longer than the fourteen (14) day standard guest provision.
 - A Sponsored Guest may be participating in a social service program, applying for family reunification, or may be needed in the CMHA Tenant’s household for a brief period of time.
 - Parties to the Sponsored Guest Agreement understand that CMHA’s permission to allow for a longer guest period does not create a tenancy or confer eligibility upon the Sponsor Guest for CMHA housing programs.
- REQUEST FOR SPONSORED GUEST STATUS:** The CMHA head of household must affirmatively request CMHA for authorization allow a sponsored guest to stay longer than the fourteen (14) day standard guest provision. CMHA has the discretion to authorize or deny the request.
- In submitting the *Request for Sponsored Guest*, the CMHA tenant head of household must submit the completed *Sponsored Guest Agreement* as outlined below:

SPONSORED GUEST AGREEMENT

SPONSORED GUEST INFORMATION:

Name

Address	
Telephone	
Email	
Relationship to Sponsoring/CMHA Resident	
Referring Agency	

CMHA SPONSORING RESIDENT:

Name	
Address	
Telephone	
Email	
Relationship to Sponsored Guest	

The Tenant _____ does submit this agreement in accordance with the following provision of CMHA Residential Dwelling Lease Agreement:

B. Prior Written Consent. The Tenant agrees to obtain the prior written consent of CMHA before permitting any additional persons (including live-in aides and foster children) to reside in the Dwelling Unit. Such new persons will be screened for admission in accordance with CMHA's Admissions and Continued Occupancy Policy. The Tenant agrees that he/she shall be responsible for the actions of all household members, guests, and all other persons under their control, and that any violations of the Lease by such persons shall be grounds for termination of the Lease and eviction from the dwelling unit.

TERMS AND CONDITIONS OF CONTINUED OCCUPANCY: Tenant may have guests or visitors for a period not to exceed fourteen (14) days each year. Permission may be granted, upon written request to the Manager, for an extension of this provision.

Tenant _____ (CMHA Sponsoring Resident) does submit this Sponsored Guest Agreement as a request for written consent to permit _____ (Sponsored Guest) to reside in the CMHA Residential Dwelling unit located at _____ as a sponsored guest for an extension of the fourteen (14) day period as set forth in the residential dwelling lease.

TERMS AND CONDITIONS OF SPONSORED GUEST AGREEMENT:

- The parties understand that the approved extension will not exceed six (6) months and does not confer any rights of continued occupancy on the sponsored guest or create a tenancy with the housing authority. The parties understand that this approval may be withdrawn by the housing authority upon 24-hour notice to the Sponsored Guest.
- Tenant is advised that the Sponsored Guest will be deemed to be under the control of the Tenant and that the Tenant is the person responsible for ensuring that the Sponsored Guest complies with the lease obligations during their stay in the Tenant's household.
- The Sponsored Guest further agrees to abide by the provisions of the referring program as attached hereto as Exhibit "A."
- The Sponsored Guest stay will terminate on _____, 2017

IN WITNESS WHEREOF, the Agreement has been executed as of the _____ day of _____, 2017/2019

Cincinnati Metropolitan Housing Authority	Tenant _____
By _____	Sponsored Guest: _____
Its: _____	

7. Section VI – Part E Verification Procedures

C. Language has been added to clarify the verification procedures for the Asset Management Program
Verification Procedures

POLICY

CMHA will obtain proper authorization from the family before requesting information from independent sources.

CMHA staff will use Enterprise Income Verification system (EIV) to streamline the verification of a family's income. This will be the first method of verifying and validating tenant reported information.

Applicants and program participants must provide true and complete information to CMHA whenever information is requested.

After the verification process is completed, CMHA will make a final determination of eligibility and continued occupancy. This decision will be based upon information provided by the family, the verification completed by CMHA, and the current eligibility criteria in effect.

This chapter explains CMHA's procedures and standards for verification of preferences, income, assets, allowable deductions, family status, and changes in family composition.

1. METHODS OF VERIFICATION AND TIME ALLOWED

- a. CMHA will verify information through the five methods of verification acceptable to HUD in the following order in accordance with its verification procedures:
 1. Enterprise Income Verification (EIV) as mandated by 24 CFR 5.233
 2. Review of Documents
 3. Third-Party Written
 4. Third-Party Oral
 5. Certification/Self-Declaration

- b. Types of income that may be verified using Enterprise Income Verification (EIV).
 1. Gross Wages and Salaries (including overtime pay, commissions, fees, tips, bonuses, and other compensation for personal services)
 2. Unemployment Compensation
 3. Welfare Benefits
 4. Social Security Benefits (including federal and state benefits, Black Lung benefits, dual benefits)
 5. Social Security (SS)
 6. Supplemental Security Income (SSI)

- c. CMHA will compare EIV reported information to tenant reported information. EIV may alleviate the need for independent third-party verifications when a family does not dispute the EIV information and provides acceptable supporting documentation, such as current pay stubs, letter from employer, etc.

EIV data will be used to validate family reported income and supplement family provided documents. HUD considers an income discrepancy to be an income source not reported by a tenant, or an income source reported at a substantial income difference from EIV (\$200 per month, or \$2,400 annually). If there is no discrepancy, CMHA will use current tenant provided documentation to calculate annual income.

2. CMHA will request written third party verification when:
 - a. Documents provided by the family are not acceptable to CMHA;
 - b. Tenant reported information differs from EIV reported information;
 - c. Family reports of loss or reduced income for an interim recertification;
 - d. Family is unable to provide verification documents requested by CMHA; or
 - e. Family disputes EIV and one or both of the above conditions apply.

3. Tenant Obligation to Supply CMHA/HUD with Information (24 CFR 960.259)

The family must supply any information that CMHA or HUD determines is necessary in the administration of the program. The family must supply any information requested by CMHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HUD requirements.

4. Rejection of Tenant Provided Documents

CMHA may reject tenant provided documentation when:

- a. Document provided is not an original;
- b. Original document has been altered, mutilated, or is not legible; or
- c. Document appears to be a forged document or does not appear to be authentic.

5. CMHA must analyze all data (EIV data, third-party verification and other documents/information provided by the family).

CMHA will review historical income data for patterns of employment, paid benefits, and/or receipt of other income, when the PHA cannot readily anticipate income, such as in cases of seasonal employment, unstable working hours, and suspected fraud.

The PHA will use the most current verified income data (and historical income data if appropriate) to calculate anticipated annual income.

- a. For applicants, verifications may not be dated more than 60-calendar days old. For tenants, verifications may not be dated more than 90-calendar days old at the time of completion of recertification.
 - b. If the PHA is unable to anticipate annual income using current information due to historical fluctuations in income, the PHA may average amounts received/earned to anticipate annual income.
 - c. Note that if the tenant disputes EIV Social Security (SS)/ Supplemental Security Income (SSI) benefit data, the PHA should request the tenant to provide the PHA with a current, original Social Security Administration (SSA) notice or benefit letter within 10 business days of their interview date. The tenant may contact SSA at 1-(800) 772-1213 or visit their local SSA office.
6. Resources for Historical Income Data:
- a. Social Security Earnings Statement (summary of gross earnings for each year that the participant has worked in his/her lifetime) may be obtained from the Social Security Administration. Request for this document may be done via mail or online at www.ssa.gov.
 - b. Two years of earnings may be obtained from the EIV System or local State Wage Information Collection Agency (SWICA). This information is only available to PHAs in states where the local SWICA has entered into an agreement with HUD to obtain wage and unemployment compensation data.
 - c. Last eight (8) amounts of Social Security benefits paid to a participant (or household member) may be obtained from the EIV system.
 - d. CMHA will allow seven (7) business days for return of third-party verifications before going to the next method. CMHA will document the file as to why third-party written verification was not received.
 - e. For applicants, verifications may not be dated more than 60-calendar days. For participants, verifications may not be dated more than 90-calendar days old at the time of completion of recertification.

7. Third-Party Written Verification

Third-party verification is used to verify information directly with the source. Third-party written verification forms will be sent and returned via first class mail, fax or e-mail. The family will be required to sign an authorization for the information source to release the specified information.

Verifications received electronically directly from the source are considered third-party written verifications.

CMHA will also accept third-party verifications in the form of computerized printouts, pay stubs and letters from the employer on employer letterhead delivered by the family from the following:

Social Security Administration	Employers
Unemployment Compensation Board	City or County Courts
Veterans Administration	Welfare Assistance
Financial Institutions	Medical Providers/Pharmacies

8. Credit Reports

When CMHA conducts annual/interim reviews of zero-income families, CMHA may run a credit report with a release signed by the family.

9. Third-Party Oral Verification

Oral third-party verification will be used when written third-party verification is delayed beyond seven (7) business days or is not possible. When third-party oral verification is used, staff will be required to initiate contact and to complete an oral verification form, noting with whom they spoke, the date of the conversation, and the facts provided.

10. Review of Documents

CMHA will accept tenant-provided information as the primary source, unless the provided documentation is not an original, appears to have been forged, has been mutilated or the documentation is not legible.

All such documents, excluding government checks, will be photocopied and retained in the applicant file.

CMHA will accept the following documents from the family provided that the document is such that tampering would be easily noted:

Consecutive and original pay stubs;

Social Security Administration Award Letter;

Bank statements;

Pension benefit statements;

Temporary Assistance to Needy Families (TANF) Award Letter;

Other official and authentic documents from a federal, state, or local agency;

Computer printouts from the employer;

Signed letters (provided that the information is confirmed by phone); and

Other documents noted in this Chapter as acceptable verification.

If third-party verification is received after documents have been accepted as provisional verification, and there is a discrepancy, CMHA will utilize the third-party verification.

CMHA will accept electronic documents.

CMHA will accept photocopies when appropriate.

Self-Certification/Self-Declaration

When verification cannot be made by EIV, third-party verification or review of documents, families will be required to submit a self-certification. Self-certification requires an affidavit certification statement under penalty of perjury.

F. RELEASE OF INFORMATION

Adult family members will be required to sign the HUD 9886 Release of Information/Privacy Act form.

In addition, family members will be required to sign specific authorization forms when information is needed that is not covered by the HUD form 9886, *Authorization for the Release of Information/Privacy Act Notice*.

Each member requested to consent to the release of specific information will be provided with a copy of the appropriate forms for their review and signature.

Family refusal to cooperate with the HUD prescribed verification system will result in denial of admission or termination of assistance. It is a family obligation to supply any information required for admission into or continued participation in the Asset Management Program and to sign all consent forms requested by CMHA or HUD.

G. ITEMS TO BE VERIFIED

Earned income for all adult household members, 18 years of age or older.

Unearned income for all household members (including minors).

Full-time student status including high school students who are 18 years of age or older.

Current assets including assets disposed of for less than fair market value within the past two years. (Net family assets in excess of \$5,000 must be verified by third party. Net family assets equal to or less than \$5,000 must be third party verified every three years. In the interim, program participants with net family asset equal to or less than \$5,000 are required to CMHA with a declaration of assets at each annual reexamination)

Child care expense where it allows an adult family member to be employed, or to actively seek work, or to further his/her education.

Total medical expenses of all family members in households whose head or spouse/co-head is elderly or disabled.

Disability assistance expenses to include only those costs associated with attendant care or auxiliary apparatus for a disabled member of the family, which allow an adult family member to be employed.

Disability for determination of preferences, allowances, deductions or reasonable accommodation.

U.S. citizenship/eligible immigrant status.

Social security numbers for all family members.

Familial/Marital status when needed for head or spouse definition.

Other factors that affect the determination of adjusted income or income-based rent.

Verification of Reason for Reduction in Welfare Benefits: CMHA will use written verification from the welfare agency stating that the family's benefits have been reduced for noncompliance with the Self-Sufficiency Program when assessing the family's request for rent reduction.

H.

VERIFICATION OF INCOME

1. EIV will be used to verify and validate tenant reported information. This section defines some specific methods CMHA will use to verify various types of income.
 2. For any family member with a fixed source of income, CMHA may elect to determine that family member's income by means of a streamlined income determination. A streamlined income determination will be conducted by applying, for each fixed-income source, the verified cost of living adjustment (COLA) or current rate of interest to the previously verified or adjusted income amount.
 3. Prior to utilizing this streamlined income determination, CMHA will verify the appropriate COLA or current rate of interest from a public source or through tenant-provided, third party-generated documentation. If no such verification is available, then CMHA will obtain third-party verification of income amounts in order to calculate the change in income for each fixed income source.
- For any family member whose income is determined pursuant to a streamlined income determination, a PHA must obtain third-party verification of all income amounts every 3 years.

4. Employment Income

- a. Acceptable methods of verification include:
 1. Check stubs, letter from the employer or earning statements, which indicate the employee's gross pay, frequency of pay or year to date earnings.
 2. Electronic third party vendor sources such as the Work Number.
 3. W-2 forms plus income tax return forms.
 4. Self-certifications and income tax returns signed by the family may be used for verifying self-employment income, or income from tips and other gratuities.
 5. Electronic print-outs.
- b. As needed, CMHA may request verification directly from the employer. The employment verification form will request the employer provide following information:
 1. Dates of employment;
 2. Amount and frequency of pay;
 3. Date of the last pay increase;
 4. Likelihood of change of employment status and effective date of any known salary increase during the next 12 months;
 5. Year to date earnings; and
 6. Estimated income from overtime, tips, and bonus pay expected during next 12 months.
- c. Applicants and program participants may be requested to sign an authorization for release of information from the Internal Revenue Service for further verification of income.

In cases where there are questions about the validity of information provided by the family, CMHA will require additional information to support the information. Where doubt regarding income exists, a referral to IRS for confirmation may be made on a case-by-case basis.

d. Social Security, Pensions, Supplementary Security Income (SSI), Disability Income

- Acceptable methods of verification include:
- a. Award or benefit notification letters prepared and signed by the providing agency.
 - b. Computer report electronically obtained or in hard copy.
- 5. Unemployment Compensation**
- Acceptable methods of verification include:
- a. Computer report electronically obtained or in hard copy, from unemployment office stating payment dates and amounts.
 - b. Payment stubs.
- 6. Welfare Payments or General Assistance**
- Acceptable methods of verification include:
- a. Written statement from payment provider indicating the amount of grant/payment, start date of payments, and anticipated changes in payment in the next 12 months.
 - b. Computer-generated Notice of Action.
 - c. Computer-generated list of recipients from the Ohio Department of Job and Family Services.

7. Alimony or Child Support Payments

- Acceptable methods of verification include:
- a. Copy of a separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules.

- b. A notarized letter from the person paying the support.
- c. Copy of latest check and/or payment stubs from Court Trustee. CMHA must record the date, amount, and number of the check.
- d. Family's self-certification of amount received and of the likelihood of support payments being received in the future, or that support payments are not being received.
- e. Printout from child support enforcement agency or other agency responsible for collection and distribution of monies.

If payments are irregular, the family must provide one of the following:

A copy of the separation or settlement agreement or a divorce decree stating the amount and type of support and payment schedules.

A statement from the agency responsible for enforcing payments to show that the family has filed for enforcement.

A notarized affidavit from the family indicating the amount(s) received.

A welfare notice of action showing amounts received by the welfare agency for child support.

A written statement from an attorney certifying that a collection or enforcement action has been filed.

Printout from child support enforcement agency or other agency responsible for collection and distribution of monies.

8. Net Income from a Business

In order to verify the net income from a business, CMHA will view IRS and financial documents from prior years and use this information to anticipate the income for the next 12 months.

Acceptable methods of verification include:

IRS Form 1040, including:

- Schedule C (Small Business)
- Schedule E (Rental Property Income)
- Schedule F (Farm Income)
-

- a. If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.
 - 1. Audited or unaudited financial statement(s) of the business.
 - 2. Credit report or loan application.
 - 3. Documents such as manifests, appointment books, cashbooks, bank statements, and receipts will be used as a guide for the prior 180 calendar days (or lesser period if not in business for 180 calendar days) to project income for the next 12 months. The family will be advised to maintain these documents in the future if they are not available.

Child Care Business

- b. If an applicant/participant is operating a licensed day care business, income will be verified as with any other business. If applicant/participant is a licensed day care business with Jobs and Family Service (JFS), a printout can be accepted from JFS to confirm income.
- c. If the applicant/participant is operating a "cash and carry" operation (which may or may not be licensed), CMHA will require that the applicant/participant complete a form for each customer which indicates: name of person(s) whose child (children) is/are being cared for, phone number, number of hours' child is being cared for, method of payment (check/cash), amount paid, and signature of person.
- d. If the family has filed a tax return, the family will be required to provide it.

9. Recurring Gifts

The family must furnish a self-certification, which contains the following information:

The person who provides the gifts;

The value of the gifts;

The regularity (dates) of the gifts; and

The purpose of the gifts.

CMHA reserves the right to verify the income amount and source of the person providing the recurring gift.

10. Zero-Income Status

Families claiming to have no income will be required to execute income verification forms e.g. family expense forms, release of information. CMHA will utilize EIV methods to verify a client's zero-income status. CMHA may also utilize credit checks to determine if there is unreported income of a household member.

11. Full-Time Student Status

Only the first \$480 of the earned income of full time students, other than head, co-head, or spouse, will be counted towards family income. Financial aid, scholarships and grants are not counted towards family income unless the amount received is in excess of the tuition. Verification of full time student status includes:

- a. Written verification from the registrar's office or other school official.
- b. School records indicating enrollment for sufficient number of credits to be considered a full-time student by the educational institution.

I. VERIFICATION OF STUDENT FINANCIAL ASSISTANCE

1. Any reported financial assistance in excess of amounts received for tuition (including all mandatory educational fees) that a person attending an institution of higher education receives under the Higher Education Act of 1965, from private sources or from an institution of higher education must be considered income unless the student is over the age of 23 with dependent children or is residing with parents who are eligible for or receiving assistance.
2. For students over the age of 23 with dependent children or students residing with parents who are eligible for or receiving assistance, the full amount of student financial assistance is excluded from annual income. The full amount of student financial assistance is also excluded for students attending schools that do not qualify as institutions of higher education. Excluded amounts are verified only if, without verification, CMHA would not be able to determine whether or to what extent the income is to be excluded.
3. For a student subject to having a portion of his/her student financial assistance included in annual income in accordance with HUD regulations, CMHA may request third-party written verification of both the source and the amount from the educational institution attended by the student as well as from any other person or entity providing such assistance as well as all authorized tuition costs.
4. If CMHA is unable to obtain third-party written or oral verification of the requested information, CMHA will pursue other forms of acceptable verification with the family and student member.

J. INCOME FROM ASSETS

1. Bank Account Interest Income and Dividends

Acceptable methods of verification include, in this order:

- a. Account statements, passbooks, certificates of deposit, or CMHA verification forms completed by the financial institution.
- b. Broker's statements showing value of stocks or bonds and the earnings credited the family. Earnings can be obtained from current newspaper quotations or oral broker's verification.
- c. IRS Form 1099 from the financial institution provided that CMHA must adjust the information to project earnings expected for the next 12 months.
- d. Self-certification of assets that generate income of less than \$5,000.00. (For established program participants)

2. Interest Income from Mortgages or Similar Arrangements

Acceptable methods of verification include, in this order:

- a. A letter from an accountant, attorney, real estate broker, the buyer, or a financial institution stating interest due for next 12 months. (A copy of the check paid by the buyer to the family is not sufficient unless a breakdown of interest and principal is shown).
- b. Amortization schedule showing interest for the 12 months following the effective date of the certification or recertification.
- c.

3. Net Rental Income from Property Owned by Family

Acceptable methods of verification include, in this order:

- a. IRS Form 1040 with Schedule E (Rental Income).
- b. Copies of latest rent receipts, leases, or other documentation of rent amounts.
- c. Documentation of allowable operating expenses of the property: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.
- d. Lessee's written statement verifying rent payments to the family and family's self-certification as to net income realized.

K. VERIFICATION OF ASSETS

Applicants – CMHA will obtain third-party verification of assets for all applicants to determine initial program eligibility.

Residents – Resident may be required to provide third party verification of all household assets. CMHA will not require resident family's with net assets equal to or less than \$5,000 to submit third party asset information during the following three annual certifications. During the stated two-year period, CMHA will accept a family's declaration of household assets with a net value of less than \$5,000., without taking additional steps to verify the accuracy of the declaration. CMHA will accept a family's self-declaration of assets with a value of less than \$5,000. The resident's self-declaration must include the current value of all household assets and the income expected to be received from those assets. CMHA's reexamination documentation, which is signed by all adult family members, may serve as the household's self – declaration of assets. Where the family has net family assets equal to or less than \$5000, CMHA will not request supporting documentation (e.g. bank statements) from the family to confirm the assets or the amount of income expected to be received from those assets.

When the resident family has net family assets in excess of \$5000, CMHA will obtain supporting documentation (as outlined below) from the family to confirm the net value and anticipated income from all assets.

L. FAMILY ASSETS

When family assets exceed \$5,000, CMHA will require the information necessary to determine the current cash value of the family's assets (the net amount the family would receive if the asset were converted to cash). Regardless of the value of a participant family's assets, third party verification must be obtained every three years.

Acceptable verification may include any of the following:

1. Verification forms, letters, or documents from a financial institution or broker.
2. Passbooks, checking account statements, certificates of deposit, bonds, or financial statements completed by a financial institution or broker.
3. Quotes from a stockbroker or realty agent as to net amount family would receive if they liquidated securities or real estate.
4. Real estate tax statements if the approximate current market value can be deduced from assessment.
5. Financial statements for business assets.
6. Copies of closing documents showing the selling price and the distribution of the sales proceeds.
7. Appraisals of personal property held as an investment.
8. Family's self-certification describing assets or cash held at the family's home or in safe deposit boxes.
9. Self-certification of assets that generate income of less than \$5,000.00 (For current program participants only)

M. Assets Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Recertification

For all certifications and recertifications, CMHA will obtain the Family's certification as to whether any family member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or recertification.

If the family certifies that they have disposed of assets for less than fair market value, verification is required that shows: (a) all assets disposed of for less than FMV, (b) the date they were disposed of, (c) the amount the family received, and (d) the market value of the assets at the time of disposition. Third-party verification will be obtained wherever possible. Income that would have been generated from the disposed of asset will be considered an asset during the annual recertification for two consecutive years. Any income that would have been calculated, had the asset been retained, will be used in calculating adjusted income.

N. VERIFICATION OF ALLOWABLE DEDUCTIONS FROM INCOME

Child Care Expenses

Childcare voucher stubs.

Written verification from the person who receives the payments is required. If the childcare provider is an individual, s/he must provide a statement of the amount they are charging the family for their services.

Verifications must specify the child care provider's name, address, telephone number, the names of the children cared for, the number of hours the child care occurs, the rate of pay, and the typical yearly amount paid, including school and vacation periods.

Family's certification as to whether any of those payments have been or will be paid or reimbursed by outside sources.

O. MEDICAL EXPENSES:

Families who claim medical expenses will be required to submit a certification as to whether or not any expense payments have been, or will be, reimbursed by an outside source. All expense claims will be verified by one or more of the methods listed below:

1. Written verification by a doctor, hospital or clinic personnel, dentist, pharmacist, of (a) the anticipated medical costs to be incurred by the family and regular payments due on medical bills; and (b) extent to which those expenses will not be reimbursed by insurance or a government agency.
2. Written confirmation by the insurance company or employer of health insurance premiums to be paid by the family.
3. Written confirmation from the Social Security Administration of Medicare premiums to be paid by the family over the next 12 months. A computer printout will be accepted.

For attendant care:

1. A reliable, knowledgeable professional's certification that the assistance of an attendant is necessary as a medical expense and a projection of the number of hours the care is needed for calculation purposes.
2. Attendant's written confirmation of hours of care provided and amount and frequency of payments received from the family or agency (or copies of canceled checks the family used to make those payments) or stubs from the agency providing the services.
3. Receipts, canceled checks, or pay stubs that verify medical costs and insurance expenses likely to be incurred in the next 12 months.
4. Copies of payment agreements or most recent invoice that verify payments made on outstanding medical bills that will continue over all or part of the next 12 months.
5. Receipts or other record of medical expenses incurred during the past 12 months that can be used to anticipate future medical

expenses. CMHA may use this approach for "general medical expenses" such as non-prescription drugs and regular visits to doctors or dentists, but not for one time, nonrecurring expenses from the previous year.

6. CMHA will use mileage at the IRS rate, cab fare, bus fare, or other public transportation cost for verification of the cost of transportation directly related to medical treatment.

P. DISABILITY EXPENSE

In All Cases:

Written certification from a reliable, knowledgeable professional that the person with disabilities requires the services of an attendant and/or the use of auxiliary apparatus to permit him/her to be employed or to function sufficiently independently to enable another family member to be employed.

Family's certification as to whether they receive reimbursement for any of the expenses of disability assistance and the amount of any reimbursement received.

Attendant Care:

Attendant's written certification of amount received from the family, frequency of receipt, and hours of care provided.

Certification of family and attendant and/or copies of canceled checks family used to make payments.

Auxiliary Apparatus:

Receipts for purchases or proof of monthly payments and maintenance expenses for auxiliary apparatus.

In the case where the person with disabilities is employed, a statement from the employer that the auxiliary apparatus is necessary for employment.

Q. VERIFYING NON-FINANCIAL FACTORS

Verification of Legal Identity

In order to prevent program abuse, CMHA will require applicants to furnish verification of legal identity for all family members.

The documents listed below will be considered acceptable verification of legal identity for adults. If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required.

1. Certificate of birth or naturalization papers;
2. Church issued baptismal certificate;
3. Current, valid driver's license;
4. U.S. military discharge (DD 214);
5. U.S. passport;
6. Voter's registration;
7. Company/Agency identification card;
8. Department of Motor Vehicles identification card/state identification card; or
9. Hospital records.

Documents considered acceptable for the verification of legal identity for minors may be one or more of the following:

1. Certificate of birth;
2. Adoption papers;
3. Custody agreement;
4. Health and Human Services ID; or
5. School records.

If none of these documents can be provided, a third party who knows the person may, at CMHA's discretion, provide verification.

R. VERIFICATION OF MARITAL STATUS

Verification of divorce status will be a certified copy of the divorce decree, signed by a Court Officer.

Verification of a separation may be a copy of court-ordered maintenance or other records.

Verification of marriage status is a marriage certificate.

Familial Relationships

The following verifications will always be required if applicable:

Verification of Relationship

Official identification showing names;

Birth certificates; or

Baptismal certificates.

S. VERIFICATION OF GUARDIANSHIP

Court-ordered assignment;

Affidavit of parent;

Verification from social services agency; or school records.

T. VERIFICATION OF PERMANENT ABSENCE OF FAMILY MEMBER

If an adult or child member who was formerly a member of the household is reported permanently absent by the family, CMHA will consider any of the following as verification:

1. Husband or wife institutes divorce action. Husband or wife institutes legal separation.
2. Order of protection/restraining order currently active with the courts, obtained by one family member against another.
3. Proof of another home address, such as utility bills, canceled checks for rent, current driver's license, or current verifiable lease or rental agreement.
4. Statements from other agencies such as social services or a written statement from the owner or manager that the adult family member is no longer living at that location.

If the adult or child family member is incarcerated, a document from the court or correctional facility should be obtained stating how long they will be incarcerated. If the incarceration is due to criminal or drug related activity while a member of the household, assistance may be terminated.

If no other proof can be provided, CMHA will accept a self-certification from the head of household. If the head of household is the absent member, proof can be provided by the spouse or co-head.

U. VERIFICATION OF CHANGE IN FAMILY COMPOSITION

CMHA may verify changes in family composition (either reported or unreported) through letters, telephone calls, utility records, inspections, owners, neighbors, credit data, school or DMV records, and other sources.

V. VERIFICATION OF DISABILITY

May be receipt of SSI or SSA disability payments under Section 223 of the Social Security Act or 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)) or verified by an appropriate diagnostician such as physician, psychiatrist, psychologist, rehab specialist, or licensed social worker.

W. VERIFICATION OF CITIZENSHIP/ELIGIBLE IMMIGRANT STATUS

To be eligible for assistance, individuals must be U.S. citizens or eligible immigrants. Individuals who are neither may elect not to contend their status. Eligible immigrants must fall into one of the categories specified by the regulations and must have their status verified by Immigration and Naturalization Service (INS). Each family member must declare his or her status once. Assistance cannot be delayed, denied, or terminated while verification of status is pending except that assistance to applicants may be delayed while CMHA hearing is pending.

Citizens or Nationals of the United States are required to sign a declaration under penalty of perjury.

CMHA will require citizens to provide documentation of citizenship.

Acceptable documentation will include at least one of the following original documents:

United States birth certificate;

United States passport;

Resident alien/registration card;

Social security card; or

Other appropriate documentation as determined by CMHA.

Eligible Immigrants age 62 or over are required to sign a declaration of eligible immigration status and provide proof of age.

Noncitizens with eligible immigration status must sign a declaration of status and verification consent form and provide their original immigration documents which are copied front and back and returned to the family. CMHA verifies the status through the INS SAVE system. If this primary verification fails to verify status, CMHA must request within ten days that the INS conduct a manual search.

Ineligible family members who do not claim to be citizens or eligible immigrants must be listed on a statement of ineligible family members signed by the head of household or spouse/co-head.

Noncitizen students on student visas are ineligible members even though they are in the country lawfully. They must provide their student visa but their status will not be verified and they do not sign a declaration but are listed on the statement of ineligible members.

X. FAILURE TO PROVIDE

If an applicant or participant family member fails to sign required declarations and consent forms or provide documents, as required, they must be listed as an ineligible member. If the entire family fails to provide and sign as required, the family may be denied or terminated for failure to provide required information.

Y. TIME OF VERIFICATION

For applicants, verification of U.S. citizenship/eligible immigrant status occurs at the same time as verification of other factors of eligibility for final eligibility determination.

CMHA will not provide assistance to any family prior to the affirmative establishment and verification of the eligibility of the individual or at least one member of the family.

For family members added after other members have been verified, the verification occurs at the first recertification after the new member moves in.

Z. EXTENSIONS OF TIME TO PROVIDE DOCUMENTS

CMHA will grant an extension not to exceed 30 calendar days for families to submit evidence of eligible immigrant status.

AA. ACCEPTABLE DOCUMENTS OF ELIGIBLE IMMIGRATION

The regulations stipulate that only the following documents are acceptable unless changes are published in the Federal Register.

- Resident Alien Card (I-551)
- Alien Registration Receipt Card (I-151)
- Arrival-Departure Record (I-94)
- Temporary Resident Card (I-688)
- Employment Authorization Card (I-688B)
- Receipt issued by the INS for issuance of replacement of any of the above documents that shows individual's entitlement has been verified.

A birth certificate is not acceptable verification of status. All documents in connection with U.S. citizenship/eligible immigrant status must be kept five years.

If CMHA determines that a family member has knowingly permitted another individual who is not eligible for assistance to reside permanently in the family's unit, the family's assistance will be terminated for three years, unless the ineligible individual has already been considered in prorating the family's assistance.

AB. VERIFICATION OF SOCIAL SECURITY NUMBERS

1. Applicants

- a. CMHA will deny eligibility to an applicant if any member of the family that is required to disclose their Social Security Number does not disclose it or provide documentation of such Social Security Number. However, if the family is otherwise eligible to participate in the program, the family may maintain their position on the wait list for a period of 90 days in order to provide the missing Social Security Number for each member of the household. If there are issues beyond the family's control that prevent the Social Security Number from being obtained, CMHA may grant the family a one-time 90-day extension to comply with the Social Security Number documentation requirement.
- b. Once the Social Security Number is obtained, the family will be placed back on the wait list based on the date and time of their original application.
- c. At the expiration of the provided time period, if any required family member has failed to comply with the Social Security Number disclosure and documentation requirements, CMHA will withdraw the family for failure to provide documentation.

2. Residents

Individuals exempt from disclosure and verification procedures are:

- a. Individuals who do not claim to have eligible immigration status;
- b. Tenants age 62+ as of 1/31/10;
- c. And Tenants who have previously disclosed a valid SSN.
- d. For participant households adding a new household member under the age of six with no assigned SSN, the new household member will be included as a household member, under a PIC generated alternate ID number. These families will be provided 90 days to provide documentation of SSN. CMHA may extend an additional 90 days if unforeseen circumstances outside of the family's control will prevent timely disclosure of required documentation.
- e. For participant households adding a new household member at least six years of age, or under the age of six with an assigned SSN, the family must disclose the SSN and provide documentation of the SSN to CMHA at the time of requesting the addition of the new household member. The new household member cannot be added to the family composition until the family has complied with SSN disclosure and verification requirements.

3. Acceptable Sources of Social Security Numbers

Verification of social security numbers will be done through a social security card issued by the Social Security Administration. If a family member cannot produce a social security card, only the documents listed below showing his or her social security number may be used for verification. The family is also required to certify in writing that the document(s) submitted in lieu of the social security card information provided are complete and accurate:

- a. A driver's license;
- b. Identification card issued by a federal, state or local agency;
- c. Identification card issued by a medical insurance company or provider (including Medicare and Medicaid);
- d. An identification card issued by an employer or trade union;
- e. Earnings statements or payroll stubs;
- f. Bank statements;
- g. IRS Form 1099;
- h. Benefit award letters from government agencies;
- i. Retirement benefit letter;
- j. Life insurance policies;
- k. Court records such as real estate, tax notices, marriage and divorce, judgment or bankruptcy records; or
- l. Verification of benefits or social security number from Social Security Administration.

11. Section XVII – Sexual Orientation

Language was added to define sexual orientation as follows:

SEXUAL ORIENTATION. Is defined as the following: Sexual Orientation is about who an individual is attracted to, or feels drawn to romantically, emotionally, and sexually. This is different than gender identity.

4. Section VII – Part B Repayment Agreement

The Repayment Agreement sections has been revised to provide more flexible terms to resident

CMHA may enter into a Repayment Agreement with a person only if they are able to make an initial payment of ~~25% of the total outstanding debt~~ and pay the remainder in ~~a maximum of six equal monthly payments~~ accordance with the schedule below. The Director of Housing Management, or his/her authorized designee, may make exceptions to the terms of a Repayment Agreement.

Repayment Schedule for Monies Owed to CMHA

(% of Total Amount)	Initial Payment Due Amount Owed	Maximum Term
25%	0-\$500	6 months
25%	\$501 - \$1,000	12 months
25%	\$1,001 - \$1,999	18 months
15%	\$2,000 - \$2,999	24 months
10%	\$3,000 - \$5,000	36 months

Summary of Proposed Changes to the 2018-2019 Residential Lease Agreement

1. Section III – Part D Transfers

CMHA will consider any Tenant request for transfer in accordance with the transfer priorities established in the Admissions and Continued Occupancy Policy. Such requests may include transfers for Reasonable Accommodation, Violence Against Women Act (“VAWA”), tenants that are victims of federal hate crimes¹ or extreme harassment; or to witnesses of crimes,² or to victims of domestic violence, dating violence, stalking, or sexual assault.³ Residents will receive three transfer offers.

(C) The PHA must submit its De-Concentration policy for field office review.

DE-CONCENTRATION PLAN

De-concentration Plan:

It is the policy of the Cincinnati Metropolitan Housing Authority to provide for de-concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. CMHA does this by allowing its pool of applicants in the asset management program to have unfettered choice from the asset management waitlists for asset management housing. The applicant’s choice of housing is based on the applicant’s decision as to which location would best provide for their housing in light of available employment, educational opportunities, family and community support.

Additionally, the CMHA will support measures to raise the incomes of households that currently reside in its housing programs through the Family Self Sufficiency programs.

Asset Management Programs:

Prior to the beginning of each fiscal year, the CMHA will analyze the income levels of families residing in each development, the income levels of census tracts in which developments are located, and the income levels of families on the waiting list. Based on this analysis, marketing strategies will be determined and de-concentration incentives implemented. CMHA will audit its site based waiting list to ensure that its efforts toward marketing and de-concentration of poverty will not adversely impact members of protected classes.

HUD has selected CMHA to participate in the Rental Assistance Demonstration (RAD) Program. Under RAD, properties are funded through a long-term Section 8 Housing Assistance Payment contract. As a result, CMHA will be converting a number of its Asset Management units to Project Based Rental Assistance (PBRAs) under the guidelines of PIH Notice 2012-32, REV-1 and any successor PIH Notices, rules and regulations. CMHA anticipates that RAD conversion will provide a diversity of incomes within the RAD developments.

CMHA has procured a vendor (Berman Hopkins) to conduct an audit of its waitlist. The waitlist audit will determine if there are any groups that are underserved by the housing authority. The waitlist audit will also determine if the waitlist procedure has any disparate impact upon protected classes.

Voucher Management Program:

CMHA will utilize the bonus indicators as set forth in 24 CFR 985.3. These indicators are:

- ☐ Half or more of all Section 8 families with children assisted by the PHA in its principal operating area at the end of the last completed PHA fiscal year reside in low poverty census tracts;
- ☐ The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA’s principal operating area during the last completed PHA fiscal year is at least 2 percentage points higher than the percent of all Section 8 families with children who reside in low poverty census tracts at the end of the last completed PHA fiscal year; or
- ☐ The percent of Section 8 families with children who moved to low-poverty census tracts in the PHA’s principal operating area over the last two completed PHA fiscal years is at least 2 percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last completed PHA fiscal year.
- ☐ State and regional PHAs that provide Section 8 rental assistance in more than one metropolitan area within a State or region make these determinations separately for each metropolitan area or portion of a metropolitan area where the PHA has assisted at least 20 Section 8 families with children in the last completed PHA fiscal year.

CMHA will utilize the services of its local fair housing advocacy agency, Housing Opportunities Made Equal (“HOME”) as a resource for services that affirmatively further fair housing and mobility services.

¹ Following consultation with Housing Opportunity Made Equal that such a transfer is appropriate.

²² Following consultation with and upon recommendation of the local prosecutor that such a transfer is appropriate and recommended.

³ The individual seeking the transfer may provide supportive referrals from a third-party social service agency, the local prosecutor or law enforcement.

Significant Amendment and Standard Deviation

1. Definition of Substantial Deviation/Modification

The definition of Substantial Deviation/Modification of CMHA's Plan is amended to exclude the following items:

"Significant Amendment" is defined as follows:

A significant amendment or modification to the annual plan is a change in the major strategies to address Housing Needs or changes in Admissions & Occupancy. For the purpose of the CFP, a proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed finance proposal are considered significant amendments to the CFP 5-Year Action Plan

The following are not considered significant amendments:

1. Changes in Public Housing Admissions & Occupancy Policies or the Section 8 Administrative Plan that are not inconsistent with the Annual Plan.
2. Changes in Public Housing Admissions & Occupancy Policies or the Section 8 Administrative Plan that are required by federal, state, or local authorities, including laws and regulations.
3. A minor change in the planned uses of financial resources (e.g., small shifts within or between different funding categories).
4. Changes in the plan resulting from consultation with Consolidated Plan authorities including the City of Cincinnati and Hamilton County, Ohio.
5. Changes that are the result of the loss of anticipated funding to support a specific proposed activity or program.
6. Changes that are due to factors outside of CMHA's control such as natural or man-made disasters that require the redirection of resources to address emerging issues.
7. Technical amendments to correct grammar and spelling mistakes; to adjust the language in the plan document to match the intended board policy as documented by board resolutions and minutes that inadvertently omitted or misstated in the existing plan document; or to update the plan to provide more accurate information that does not impact policies such as corrections to reports on past activities and statistics on housing and population characteristics.
8. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the conversion will include use of additional Capital Funds;
9. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
10. Changes to the financing structure for each approved RAD conversion.
11. Additions of non-emergency work items (items not included in the Annual statement or 5-year Action plan) or change in use of replacement reserve funds under Capital Fund.

"Substantial Deviation" is defined as follows:

1. Any change with regard to demolition or disposition, designation, homeowner programs or conversion activities.
2. Fundamental alteration of the goals, mission or objectives of CMHA.

New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

- | Y | N | |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Hope VI or Choice Neighborhoods. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Mixed Finance Modernization or Development. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Demolition and/or Disposition. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Tenant-Based Assistance. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Project-Based Assistance under RAD. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Occupancy by Over-Income Families. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Occupancy by Police Officers. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Non-Smoking Policies. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Project-Based Vouchers. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Units with Approved Vacancies for Modernization. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

(b) If any of these activities are planned for the current 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.

HOPE VI OR CHOICE NEIGHBORHOODS:

HOPE VI - CMHA submitted a plan to permit the closure of the Lincoln and Laurel HOPE VI grants. The Lincoln Court plan was approved and CMHA is currently in the process of submitting the final reports to permit closing. The Laurel grant closure is pending resolution of the proposed homeownership plan changes addressing the extraordinarily weak market demands and underwriting changes born out of banking reform. These documents will be submitted upon an agreed upon plan.

MIXED FINANCE MODERNIZATION OR DEVELOPMENT

CMHA will continue to develop affordable units over the next several years, consistent with:

- CMHA's strategic goal of developing affordable housing units.
- Cooperation agreements with Hamilton County and the city of Cincinnati.
- CMHA's long term viability assessment of public housing units.
- CMHA's strategic plan and the Voluntary Compliance Agreement between CMHA and the Department of Housing and Urban Development.

In the development of these units, CMHA will adhere to the following principles:

- Assessment of quality and condition of units for replacement with new construction to meet housing needs.
- Provision of marketable amenities and encouragement of neighborhood amenities.
- Provision of choice and opportunity
- Leveraging of resources, tying into community planning and partnerships where possible
- Provision of comprehensive plan/solution for community/site revitalization which includes people, housing and neighborhoods and partner where possible.
- Provision of housing opportunities and choice for income tiers of 0-120% of Area Median Income (AMI) for seniors, families and other populations.
- Creation of synergistic economic development and economic inclusion with & within communities.

Further, CMHA will consider the following for future developments:

- Feasibility of non-smoking developments, create partnerships to develop assisted living units, plan ongoing senior/family developments and continually evaluate the special needs populations that need served (all within the 0 -120 % of AMI).
- Assessment of CMHA units and properties, while pursuing the forward movement of development goals.
- Availability and feasibility of alternative funding streams - review, analyze and plan new housing programs.
- Synergist partnerships.
- Community and waitlist needs.
- CMHA may evaluate the 811 program for the mixed finance projects.
- CMHA may evaluate the use of Federal Historic Preservation Credits, Ohio State Preservation Credits and New Market Tax Credits.

CMHA will utilize various methods of public and private financing, and will consider the recommendations of the Hamilton County Housing Study in this initiative. These units will be developed using a variety of development methods (i.e. new construction, acquisition, acquisition/rehabilitation, etc.).

Family Development(s) - In addition to specific development plans outlined below, CMHA plans to develop one or more developments of 60-120 affordable housing units for families within Hamilton County including the city of Cincinnati. CMHA is evaluating multiple approaches to accomplish this objective such as home ownership, lease-purchase, rental, and/or a combination of these.

Senior Development(s) - In addition to specific development plans outlined below, CMHA plans to develop one or more 40-120 dwelling units within Hamilton County including the city of Cincinnati to serve the elderly population.

Fairmount / English Woods -

CMHA will undertake development efforts for the English Woods site in Fairmount. This plan includes the production family and senior developments in North Fairmount, assistance to single family homeowners and development on the former English Woods site as well as the demolition of Marquette Manor. CMHA will apply for various funding sources to implement the transformation plan for the Fairmount/English Woods subject area.

Lincoln Heights - CMHA is considering development of up to 70 family units through renovation or replacement of under positioned buildings.

Walnut Hills - CMHA is considering the replacement of 12 units of Low Income Public Housing units in the Rockdale development in Walnut Hills.

North College Hill - CMHA is considering the development of affordable units on vacant land in North College Hill.

Kennedy Heights - CMHA is considering the development of affordable units in Kennedy Heights.

Avondale - CMHA is considering the development of affordable units in Avondale.

Woodlawn - CMHA is considering the development of affordable units in Woodlawn.

Over-the-Rhine - CMHA is evaluating the redevelopment of our Race Street properties to convert first floors back to retail and rehabilitate the residential units.

West End Properties -

CMHA will issue a Request for Proposals to attract development partners for the creation of a home ownership project on several vacant parcels located in the West End neighborhood of Cincinnati.

Workforce Housing - CMHA intends to develop up to 60 units of workforce housing within the city of Cincinnati and/or Hamilton County. CMHA is considering using the Walnut Hills, and North College Hill

Home Ownership at City West - CMHA plans to construct a sufficient number of homeownership units to complete the Ezzard Charles Drive and Laurel Park Circle portion of the original Laurel Homeownership plan. These units will be a mix of market and affordable units and may be developed with assistance of a development partner.

Replacement Units - As any planned demolition or disposition is undertaken, CMHA will seek to replace these units 1 for 1 in the same neighborhoods. Some neighborhoods that CMHA may undertake these activities in include Norwood, Reading, Anderson Township, Sycamore Township, Colerain Township, Blue Ash, Forest Park, Deer Park, Green Township English Woods and Harrison.

Rental Assistance Demonstration Program and Section 18 Blending - Over the next several years, CMHA plans to convert all of its public housing through the Rental Assistance Demonstration (RAD) and Section 18 Programs. [CMHA may use other HUD tools, including the RAD Transfer of Assistance program to invest and preserve the Agency's affordable housing units. RAD Transfer of Assistance allows CMHA to transfer the housing assistance from existing assisted units that are not viable to new units in order to preserve the affordability.](#)

CMHA plans to submit Portfolio RAD Application in a multi-phase approach. Currently, CMHA has submitted RAD Applications for AMPs 204, 205, 210, 211, 213, 214, 216 and 218. CMHA will also support the Community Builders' RAD Applications for the City West Amps 301-308.

The Cincinnati Metropolitan Housing Authority (CMHA) - On January 2, 2018, the United States Department of Housing and Urban Development issued to CMHA a Commitment to Enter into a Housing Assistance Payment Contract (CHAP) for the units listed below. The award was issued pursuant to the Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. No. 112-55, approved November 18, 2011 and the Consolidated and Further Continuing Appropriations Act of 2015 (P.L. 113-235) approved December 6, 2014; Section 8 of the United States Housing Act, 42 U.S.C. 1437 et seq.; and the Department of Housing and Urban Development Act, 42 U.S.C. 3531 et seq.

As a result, CMHA will be converting a number of its Asset Management units to either Project Based Vouchers through voluntary compliance or Project Based Rental Assistance (PBRAs) under the guidelines of PIH Notice 2012-32, REV-3, [PIH Notice 2018-04](#) and any successor PIH Notices, rules and regulations. Upon conversion, CMHA will adopt resident rights, participation, waiting list and grievance procedures [listed in Section 1.7.B & 1.7.C of PIH Notices 2012-32, REV-4 as required by HUD.](#) ~~These resident rights, participation, waiting lists and grievance procedures are appended to this Attachment. Additionally, CMHA is currently compliant with all will comply with all~~ fair housing, and civil rights requirements.

[The RAD and Section 18 Blending programs](#) was designed by HUD to assist in addressing the capital needs of public housing by providing housing authorities with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware, that upon conversion, CMHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of Demonstration, and that CMHA may also borrow funds to address their capital needs. CMHA may also decide to contribute Operating Reserves available at the time of conversion and Capital Funds in the amount of \$10,500,000 towards the conversion. CMHA currently has debt under the Capital Fund Financing Program and will be working with its lender to address outstanding debt issues, which may result in additional reductions of capital funds.

Below please find information about specific developments CMHA selected for RAD [and Section 18 Blending](#):

Dev.	PIC ID	Conv Type	Trans. Assist.	0 Bed	1 bed	2 Bed	3 Bed	4 Bed	5 Bed	6 Bed	Total
Marianna Terrace	OH004-000204	RAD PBRA-Section 18 PBV Family-Family	YesNo	0	14	27	27	4	4	0	76
Scattered Sites	OH004-000205	RAD PBRA-Section 18 PBV FamilyPBRA-Family	YesNo	0	4	12	8	0	0	0	24
Findlater Gardens Phase 1	OH004-000210	RAD PBRA-Section 18 PBV FamilyPBRA-Family	YesNo	0	98	210	214	111	170	30	645
Findlater Gardens Phase 2	OH004-000210	PBRA-Family	No	0	25	24	22	35	2	2	110
Evanston	OH004-000211	RAD PBRA-Family PBRA-Family	No	0	100	0	0	0	0	0	100
Park Eden	OH004-000213	PBRA-FamilyRAD PBRA Family	No	6	169	1	0	0	0	0	176

Stanley Rowe Towers A&B and Liberty St Apts	OH004-000214	RAD PBRA-Section 18 PBV Family	YesNo	026	16122	25562	10135	99	23	00	130554
Pinecrest	OH004-000216	RAD PBRA-Section 18 PBV Family	YesNo	0	178	12	0	0	0	0	190
Sutter View Phase 4	OH004-000218	RAD PBRA-Section 18 PBV Family	YesNo	0	239	4321	2949	239	0	10	11958
Maple Tower	OH004-000211	RAD PBRA-Section 18 PBV Family	Yes	0	114	6	0	0	0	0	120
Beechwood	OH004-000211	RAD PBRA-Section 18 PBV Family	Yes	16	132	1	0	0	0	0	149
Winton Terrace	OH004-000209	RAD PBRA-Section 18 PBV Family	Yes	0	86	274	147	99	2	0	608
Milvale	OH004-000217	RAD PBRA-Section 18 PBV Family	Yes	0	32	208	179	43	1	5	562468
San Marco	OH004-000212	RAD PBRA-Section 18 PBV Family	Yes	0	30	0	0	0	0	0	30
Riverview	OH004-000212	RAD PBRA-Section 18 PBV Family	Yes	28	81	1	0	0	0	0	110
Redding	OH004-000213	RAD PBRA-Section 18 PBV Family	Yes	7	90	3	0	0	0	0	100
Marquette Manor	OH004-000218	RAD PBRA-Section 18 PBV Family	Yes	0	140	0	0	0	0	0	140
President	OH004-000213	RAD PBRA-Section 18 PBV Family	Yes	23	72	1	0	0	0	0	966

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Resident Rights, Participation, Waiting List and Grievance Procedures Under RAD
(attachment to Significant Amendment)

- No Re-screening of Tenants upon conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.
- Right to Return.** Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to the development once rehabilitation or construction is completed.
- Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 years. To implement this provision, HUD is waiving section 24 CFR 880.201 to the limited extent necessary to allow for the phase-in of tenant rent increases.
- Resident Participating and Funding.** Residents of covered projects converting assistance to PBRAs will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing). In addition, CMHA will continue to provide \$25 per occupied unit annually for resident participation.
- Resident Procedural Rights.**

- **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR §880.607, related to owner termination of tenancy and eviction the termination procedure for RAD conversion to PBRA will require that CMHA provide adequate written notice of termination of the lease which shall not be less than:

- **A reasonable period of time, but not to exceed 3 days:**

- If the health or safety of other tenants, CMHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
- In the event of any drug-related or violent criminal activity or any felony conviction;
- 14 days in the case of nonpayment of rent; and
- 30 days in any other case, except that if a State of local law provides for a shorter period of time, such shorter period shall apply.

7. Grievance Process. In addition to program rules that require that tenants are given notice of covered actions under 24 CFR Part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD is incorporating resident procedural rights to comply with the requirements of section 6 of the Act. RAD will require that:

1. Residents be provided with notice of the specific grounds of the proposed owner adverse action, as well as their right to an informal hearing with CMHA (as owner);
2. Residents will have an opportunity for an informal hearing with an impartial member of CMHA's staff (as owner) within 90 days of the request for an informal hearing;
3. Residents will have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others make statements at the hearing, and to examine any regulations and any evidence relied upon by the owner as the basis for the adverse action. With reasonable notice at least 48 hours prior to the hearing that resident may request that CMHA (as owner), prior to hearing and at the residents' own cost, resident may copy any documents or records related to the proposed adverse action; and
4. CMHA (as owner) provides the resident with a written decision within 30 days of the hearing stating the grounds for the adverse action, and the evidence CMHA (as owner) relied on as the basis for the adverse action.
5. CMHA (as owner) will be bound by decisions from these hearings, except if the:
 - Hearing concerns a matter that exceeds the authority of the impartial party. Decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law.
 - If CMHA (as owner) determines that it is not bound by a hearing decision, CMHA must notify the resident within 45 days of this determination, and of the reasons for the determination.

8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID exclusion after conversion, in accordance with regulations at 24 CFR § 960.255. After conversion, no other tenants will be eligible to receive the EID. If a tenant receiving the EID exclusion undergoes a break in employment, ceases to use the EID exclusion, or the EID exclusion expires in accordance with 24 CFR §960.255, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision. Instead, the rent will automatically be adjusted to the appropriate rent level based upon tenant income at that time.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as "PHA residents" for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents.

10. Relocation Plan. CMHA anticipates a need for relocation for Sutter [View Phase I](#) AMP 218. At this time, CMHA does anticipate the need for relocation at the following developments; Marianna Terrace AMP 204, Scattered Sites AMP 205 24 units, Findlater Gardens [Phase I and Phase II](#) AMP 211, Evanston AMP 211, [Park Eden 216 AMP](#), [Stanley Rowe Towers A and B](#) and Liberty St. Apts AMP 214, [Maple * AMP](#), [Beechwood * AMP](#), [Winton Terrace * AMP](#), [Milvale * AMP](#) and Pinecrest AMP 216. CMHA has developed a master relocation plan that will be used to develop a site specific relocation plan. CMHA will follow both the URA and RAD relocation requirements. The displacement of our residents will be minimized to the greatest extent feasible based upon our construction schedule.

Planned Funding Sources - CMHA will accomplish the development of affordable housing by using variety of different funding sources including but not limited to:

- Replacement Housing Factor Funds (RHF)
- Demolition/Disposition Transitional Funding (DDTF)
- Capital Grant Funds
- Public Housing Operating Reserves (as permitted)
- Low Income Housing Tax Credits (LIHTC)
- Federal Home Loan Bank (FHLB) grants and loans
- Ohio Housing Finance Agency (OHFA) grants and loans
- Choice Neighborhood Implementation Grants

- Bond funds (as required for 4% LIHTC)
- Private grants and loans
- 811 Program
- City and County HOME funds
- CDBG funds
- And other funding sources as appropriate and available

Non-dwelling Space Development - CMHA is considering repurposing existing under-used, non-dwelling space to further resident employment and training. The goals of this undertaking would be to improve outcomes for tenants and create additional revenue for CMHA. In new development efforts, CMHA is also considering the development of Capital Assets that will support employment and training initiatives for residents. This includes the planned commercial development on the site of Cary Crossing.

Accessibility Improvements - CMHA is planning on converting additional units from its existing and future asset management units to 504 compliance standards. These units will be located throughout Hamilton County providing additional accessibility options for the families we serve. The plan is to convert the units into fully 504 compliant units where feasible. All new development efforts will meet or exceed HUD's 504 Accessibility requirements where feasible.

Density Reduction - CMHA is planning to conduct a feasibility study that will address density reduction/de-concentration of its larger developments.

DEMOLITION AND/OR DISPOSITION

The following table is a planning tool that CMHA uses to inform HUD and other stakeholders of potential considerations for future demolition/disposition and replacement of properties in the portfolio. CMHA has established a perpetual annual physical inspection and assessment process to conduct reviews of the entire portfolio over a four-year period. Based on the comprehensive assessment recommendations and findings, CMHA can make informed and thoughtful recommendations to HUD on the possible demolition or disposition of properties. As any planned demolition or disposition is undertaken, CMHA will seek to replace the units in the same communities as long as the neighborhood is below city/county average poverty rates, are potentially in an area of opportunity, and/or the long term residents of the units are satisfied connected with the neighborhood and view the community as home, or are part of a neighborhood revitalization plan. The objective is to provide quality and safe housing that operates efficiently and effectively for our residents. Multiple approaches are being evaluated to continue to deliver quality sustainable housing units and to pursue the perseverance of sustainable affordable housing units that provide choice and opportunity for our residents. To accomplish this objective and after due diligence, concepts such as acquisition/rehabilitation, new construction for replacement units as well as conversion of rental single family homes to homeownership and review of other funding programs are being considered and implemented. Some of these options are discussed throughout this annual plan.

The following table is utilized to reflect Demolition/Disposition activities.

Column 1a and 1b identify the development name and HUD project number associated with the development.

Column 2 describes whether CMHA is pursuing demolition or disposition.

Column 3 reflects the status of application each year, such as if it is an application CMHA intends to submit (Planned application), or if the application has been submitted and we are either waiting approval (Submitted, pending approval) or it has been approved.

Column 4 provides a date that Column 3 indicated status is to be achieved or has been achieved, for example if the Column 3 status indicates "planned application", then the date in section 4 reflects estimated date the CMHA plans to submit the application.

Column 5 and 6 speak to how many units and whether the entire development or portion of the development is impacted.

Column 7 provides an estimated start and end date of when the activity of demolition/disposition may begin after the agency has an approved application. The first step of any activity begins with potential relocation and procurement of all funding sources and contractors.

Demolition/Disposition Activity Description Table

	1a.	1b.	2	3	4	5	6	7	8
AMP	Development	Dev #	Type	Status	Date	Effected Area		Timeline	Narrative
201	1708-1726 Race Street	OH004-39	Demo/ Dispo	Planned	4/18	23 Units	Partial	4/19-4/20	CMHA does not plan to reduce its housing unit count
201	1 Linden St.	OH004-45	Dispo	Approved	3/15	1 unit	Partial	7/16-7/17	CMHA does not plan to reduce its housing unit count
207	211 E. Broadway	OH004-58	Deminimus/Dispo	Approved	01/18	2 units	Partial	01/18-9/18	CMHA does not plan to reduce its housing unit count

208	415-437 Rockdale	OH004-40	Demo/ Dispo	Planned	7/19	12 units	Partial	7/21-7/22	CMHA does not plan to reduce its housing unit count
208	2-52 Washington Terrace	OH004-40	Demo/ Dispo	Approved	3/15	17 Units	Partial	10/18-10/20	This is an eminent domain action
208	415-417 Catherine	OH004-23	Demo/Dispo	Planned	7/19	4 Units	Partial	10/21-10/22	CMHA does not plan to reduce its housing unit count
208	418 Kasota	OH004-40	Demo/Dispo	Planned	7/19	7 Units	Partial	10/21-10/23	CMHA does not plan to reduce its housing unit count
211	3460 Hallwood Lane	OH004-19	Dispo	Planned	4/18	Land Only	Partial	4/18-1/19	
217	Millvale South (Moosewood Ave & Bowling Green Ct) & Millvale North (Millvale Ct)	OH004-000217	Demo	Planned	11/18	86 units	Partial	11/18-5/19	
218	1999 Sutter (Marquette)	OH004-11	Demo/Dispo	Planned	10/18	140 units	Partial	10/19-10/20	CMHA does not plan to reduce its housing unit count
218	English Woods Land	OH004-04	Dispo	Planned	04/18	Land Only	Total	10/19-10/20	
	Grandview	OH004-39	Dispo	Planned	10/18	Land Only	Partial	1/19-1/20	
	Lincoln Ct (Phase V)	OH004-02	Dispo	Approved	6/17	Land Only	Partial	7/18-7/19	
207	4637 Ashtree	OH004-000207	Demo/Dispo	Planned	1/19	1 unit	Partial	1/19-7/19	CMHA does not plan to reduce its housing unit count
205	1636 Pasadena	OH004-000205	Demo/Dispo	Planned	1/19	1 unit	Partial	1/19-7/19	CMHA does not plan to reduce its housing unit count
218	Sutter View	OH004-000218	Demo/Dispo	Planned	12/18	28 units	Partial	12/18-12/19	These unit will be assisted with project-based vouchers
218	Sutter View	OH004-000218	Demo	Planned	12/18	5 units	Partial	12/18-12/19	These units will receive tenant protection vouchers
DESIGNATED HOUSING FOR ELDERLY AND/OR DISABLED FAMILIES									

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Asset Management

During the 2017 Annual Plan period, staff will be developing a Designated Housing Plan for Elderly at the following sites.

Development Name	Designation Type	Application Date	Approval Date	Number of units Affected
West Union Square	Elderly Only	02/21/17	03/20/17	19
Central YMCA	Elderly Only	02/21/17	03/20/17	15

UNITS WITH APPROVED VACANCIES FOR MODERNIZATION:

CMHA on a monthly basis submits for approval all units that are scheduled to receive substantial modernization. Only those units that receive approval are updated in PIC with the status of Modernization. The following table identifies the number of units by AMP with expected completion dates. As a planning tool it also identifies possible projects that may receive substantial modernization activities in the next fiscal year.

AMP	Project	Project Name	Unit Count	Status	Construction Completion Date
AMP 201	Various Addresses	Scattered Sites	4	Pending Submission	
AMP 202	Various Addresses	Scattered Sites	5	Pending Submission	
AMP 203	Various Addresses	Scattered Sites	5	Pending Submission	
AMP 204	Various Addresses	Scattered Sites	4	Pending Submission	
AMP 205	OH004-27	Quebec Gardens	40	Pending Submission	
AMP 205	Various Addresses	Scattered Sites	24	Pending Submission	
AMP 206	Various Addresses	Scattered Sites	5	Pending Submission	
AMP 207	Various Addresses	Scattered Sites	6	Pending Submission	
AMP 208	Various Address	Scattered Sites	10	Pending Submission	
AMP 208	OH004-29	Rion Lane	40	Pending Submission	
AMP 209	OH004-001	Winton Terrace	10	Pending Submission	
AMP 217	OH004-06	Millvale	29	Approved	
AMP 218	Marquette/Suterview	Marquette	140	Pending Submission	
					4/1/2018

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 02/29/2016

Civil Rights Certification
Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Cincinnati Metropolitan Housing Authority
PHA Name

OH004
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

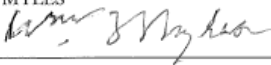
Name of Authorized Official

Title

WILLIAM MYLES

BOARD CHAIR

Signature



Date March 27, 2018

Previous version is obsolete

Page 1 of 1

form HUD-50077-CR (2/2013)

RESOLUTION NO. 5087
RESOLUTION TO ADOPT CERTIFICATIONS OF COMPLIANCE –
HUD 50077 FOR THE CINCINNATI METROPOLITAN HOUSING
AUTHORITY'S ANNUAL PLAN FOR FISCAL YEAR 2019
EFFECTIVE JULY 1, 2018 – JUNE 30, 2019

RESOLUTION NO. 5087

**Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning 07/01/18, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).

8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Cincinnati Metropolitan Housing Authority

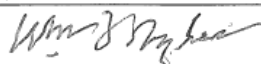
OH004

PHA Name

PHA Number/HA Code

☒ Annual PHA Plan for Fiscal Year 2019 - July 01, 2018 – June 30, 2019

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official	Title
William Myles	Board Chairman
Signature 	Date 3/27/18

B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>(c) The Plante Moran Audit team has issued a "material weakness" finding regarding deficiencies in internal controls over the general ledger during FY2017. The primary assertions are not performing an annual review for allowances prior to 2017, maintaining effective controls over the general ledger, concern regarding methodology of recording grant activity and audit entries for unrecorded transactions.</p> <p>CMHA responses have been filed with the Annual Financial Reports issued by Plante Moran.</p>
B.5	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><u>CMHA Goals and Objectives:</u></p> <p>Strategic Goals</p> <ol style="list-style-type: none"> 1. Efficiency and Fiscal Responsibility: Develop a strong and profitable financial model and be good stewards of public funds. 2. Improve Processes and Performance: Manage an efficient and cost-effective internal operation. 3. Revive our Communities: Create and generate partnerships that promote healthy and stable neighborhoods in Hamilton County. 4. Quality Customer Service: Provide superior customer services and quality products. 5. Implementation of RAD. 6. Reduce expenses through the implementation of RAD <p>Annual Goals:</p> <ol style="list-style-type: none"> 1. Increase PHAS points in the Asset Management and maintain High Performer in HCV. 2. Train staff on different funding models that deal with RAD conversion 3. Partner with Community Based Organizations and state agencies to collaborate on financial goals for our families. 4. Develop a new property management model for CMHA 5. Continue to update policies and SOP's. 6. Improve internal and external communications. 7. Continue to increase family income in the HCV Family Self-sufficiency Program. 8. Continue to recruit new property owners for the HCV Program. 9. Project Base Assistance for up to 20% of funded HCV voucher baseline. 10. Complete financial study centered around RAD 11. Assess, renovate or modernize asset management units: 12. Work towards converting up to 100% of agency's portfolio to RAD. 13. Expand portfolio to provide housing for special populations such as; multi-generational, work-force housing, veterans, individuals with disabilities and seniors, through development and project basing with partners. 14. Implement green and sustainable housing initiatives such as; net/near zero, enterprise green and LEED. 15. Continue to further fair housing throughout Hamilton County. 16. Implement the new software YARDL. 17. Continue to implement MTW like programs to improve resident's self-sufficiency, agency efficiency, and to improve program delivery to all customers. 18. Improve security camera systems throughout the organization once funding allows. 19. Review and update all lease agreements such as; CRC leases, City West Commercial, Mod-Rehab, Head start, St. Vincent de Paul, Millvale Daddy's Daycare, and second mortgages on HOPE VI homeownership properties, J-RAB, City of Cincinnati, Duke Energy and Hamilton County. 20. Develop RFP's to re-develop parts of English Woods. <p><u>CMHA Progress Report:</u></p> <ul style="list-style-type: none"> • In 2016 CMHA accomplished the following: <ol style="list-style-type: none"> 1. Completed year three of the Strategic Plan goals. 2. Updated the ACOP 3. CMHA achieved high performer status under SEMAP for the Housing Choice Voucher Program 4. Increased sight and sound unit mix over the last year. 5. Started construction on West Union Square. 6. Created over 50 linkages with social service agencies to help our residents achieve a higher quality of life. 7. Continued to implement the M.O.V.E. program to help residents increase their revenue earning potential by linking residents with available organizations that hire on the spot. 8. Continued to participate in the state-wide Home For the Holidays program as it pertains to our veterans. 9. Averaged 77% of new hires being Section 3 residents.

	<p>10. Construction contracts were awarded as such; 57% to Section 3 business concerns, 38.2% to MBE's and 19% went to WBE's.</p> <p>11. Economic Inclusion program was recognized by City of Cincinnati, HUD and various communities and other PHA's for the work we have done to ensure inclusion in all of our projects.</p> <p>12. Continued our partnership with Sherwin Williams "Home Work" training program. 40 CMHA residents completed 40 hours of training to help them establish full time employment.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>Meetings with the Resident Advisory Board were scheduled on the following dates:</p> <p><u>2018/2019 Annual Plan Meeting Schedule and Discussion Topics:</u></p> <ul style="list-style-type: none"> ▪ Friday, October 6, 2017 – Meeting was rescheduled to October 17th ▪ Tuesday, October 17, 2017 - Capital Items ▪ Monday, November 06, 2017 – Lease/ACOP ▪ Monday, November 20, 2017 – Capital Items – Meeting was canceled by J-RAB ▪ Wednesday, November 29, 2017 – Lease/ACOP – Meeting was canceled by J-RAB ▪ Wednesday, December 06, 2018 – Capital Items – Meeting was canceled by J-RAB ▪ Wednesday, December 13, 2017 – Final Comprehensive review for the Capital / Lease / ACOP. <p>a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(d) 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.</p> <p><u>MEETING HELD WITH J-RAB ON 10/17/17</u></p> <ul style="list-style-type: none"> - Ms. Calhoun started the meeting out by telling all J-RAB member attendees that they were not to sign anything from CMHA including the meeting Sign-In sheet. - CMHA was informed that Ms. Hill was listening by phone. - Ms. Calhoun stated that she was not sure why CMHA came out to review Capital items every year because nothing that they say ever gets included in the plan. Joe Norton explained that was not true and gave examples. (Redding elevator) Joe also explained that CMHA had a backlog of \$100M in repairs that needed to be completed. Each year we only receive approximately \$7-9M which is not enough to cover those. CMHA has to prioritize its capital project by addressing health and safety issues first. Ms. Calhoun agreed. - Joe discussed the changes in the new EPIC system that he would be using this year. - Joe explained the difference between Budget Line Items: BLI-1450 Site improvements / BLI-1460 Anything that touches the building. - It was explained that the current priority list is what is listed on the 2017 Capital Statement. - Ms. Calhoun presented the replacement of the windows at San Marco for consideration. - Maple Tower is experiencing sewer backups. Not sure if it is a capital item because we don't know what is the cause at the moment. - Ms. Calhoun asked if Joe could come out and talk to J-RAB every couple of months to let them know the status of items on the Capital budget. - REC'D is sending out a Modernization newsletter bi-monthly in the rent statements. Ms. Calhoun said that she has been receiving calls from people once they see this report. - Pet Policy: Ms. Husband suggested that we need changes to the pet policy. Millvale has many big dogs on the properties and most are not authorized. <ul style="list-style-type: none"> • Joy mentioned that HUD has issued a new PIH notice on service animals. • A pet does not need any specific certifications • Lease does say that those types of pets are banned • Reasonable accommodations can override this rule. • J-RAB requested that the language in our policy be changed to "Except in a reasonable accommodation situation." • No one is cleaning up after their pets • J-RAB asked if there was a way that authorized pets could be identified while on the property.

- Ms. Calhoun is reviewing the Resident Patrol program. Then Mr. Boddie will take it out to the residents to review and get feedback.
 - What is the job of the CMHA staff person that sits in the office? When anything happens, the Resident Council still gets the calls.
 - Are we still going to have an outside security company that walks the grounds?
 - Mr. Boddie to research why the Evanston cameras are still not working
 - Would CMHA consider training the younger residents to do maintenance on the buildings?
 - Joy Gazaway stated there are no changes in the Grievance Procedures this year
- Stanley Row – New fire panel installed, tested and approved, except for the 9th floor. The building inspector and the fire Marshall tested all building alarms, detectors in a random sample of units.

MEETING HELD WITH J-RAB ON 11/06/17

Pet Policy:

- Meeting opened with a discussion on the Pet Policy.
- Residents would like all approved pets to wear an ID tag on their collar. This includes service animals, but would not differentiate them from other pets.
- Residents would like all pet clean up rules to be enforced.
- It was suggested that CMHA put up waste disposal bag dispensers for clean-up.
- Complaint from Maple Tower that residents are bringing dogs into the food service areas. Joy to research if only service animals are allowed to access those areas.

Lease:

- Reviewed first half of the lease documents by sections.
- Discussed who was allowed to be on the lease for the unit.
- Renewal is in 1 year terms
- Residents need to wait for CMHA approval before they have someone move into their apartment.
- Question: If the person is on the waitlist already at CMHA, why can't they just go ahead and move in with you? Answer: Just because someone is already on the waitlist does not mean they will be approved for an apartment. The list is not a guarantee. The resident still has to be approved.
- Discussed terms of the lease including the following: Payments, security deposits, late fees and insufficient funds fee. Have not been charging the late fees in the recent past. Property managers will not be accepting payments in the mgmt. office.
- Ms. Calhoun is having an issue with 5/3 Bank and US Bank paying rents on time. Auto-pay is always late and she pays a few days in advance of the due date.
- Ms. Flowers explained that the rent statements give a warning about upcoming charges so they have plenty of time to ask questions before they are charged.
- Council presidents are receiving complaints that residents are being charged for normal wear and tear on their I.D. badges.
- Residents are saying that they are getting charged for excess utility charges. Ms. Flowers explained that this will happen if they add appliances like an extra refrigerator.
- Discussed city fines: Cans not being removed by the required time, grass not being cut, furniture sitting at the curb. Please call your property management office to find out what days are pick up for larger items. Do not put them out in advance.
- Moneca Collins (new Resident Council President at Winton Terrace) asked if it was ok to hold a meeting with the residents of Winton Terrace to discuss trash issues. Ms. Flowers said it was fine but you couldn't make it mandatory.
- Payment locations: You can make payments through US Bank either online or over the phone. You can't pay your rent at any bank branch.
- Residents must maintain utility services.
- Security deposits will be held and applied to charges when the tenant moves out.
- Visitor occupancy: Can't exceed more than 14 days in one calendar year.
- CMHA must be notified of new business starts.
- There will be no changes in the section that covers changes of income, rent increases, etc...
- Transfers: Must give written notice and the tenant must move if it is granted.

- Reasonable accommodation requests: Can either be through a unit transfer or unit rehab.
 - Transfers need to be complete within 3 days. There were some concerns on this subject. Ms. Flowers asked that everyone review pages 32-37 in the ACOP (the occupancy guidelines) prior to the next meeting.
 - Question: Why can't residents move to another development for no particular reason? Ms. Flowers explained that the ACOP clearly states when you can and can't request a transfer.
 - Question: Is mold found in a unit an immediate transfer? Mr. Norton explained that if the mold is harmless and can be immediately remediated, there would be no need to transfer to a different unit.
- Question: How often is your unit supposed to get repainted? Ms. Flowers explained that there is no set guideline for painting units.

MEETING HELD WITH J-RAB ON 12/13/17

- Ms. Calhoun opened the meeting by telling the group that the members of J-RAB would not be attending the meeting because CMHA does not fix their work orders. All but CMHA staff refused to sign the sign-in sheet.
- Ms. Calhoun reported that the alarm on the back door of San Marco was not working. Marquita stated that was an Operations item and she would address the issue.
- Ms. Calhoun asked what happens to RAD if the tax bill does not pass. Joe explained that the RAD program would still move forward with possible delays while we look for other financing options to complete the finance packages.
- Both parties agreed that pets that are registered through CMHA would wear an identifying tax on its collar. This will be added to the Pet Policy for the Annual Plan.
- Sponsored Guest section of the ACOP has been changed. When there is an extended stay for re-unification or just a guest who has stayed longer than two weeks; CMHA will make an effort to work with that guest to achieve an alternative goal.
- Verification Procedure Changes: There will be a clarification on forms that can be used for legal identity. There are some changes to the re-payment agreement procedures. Definition of sexual orientation has been added. Minor changes to the Transfer section.
- Capital Items: Ms. Calhoun asked how many units have been over 7 years since they were painted on the interior. Mr. Norton agreed to put together a cyclical list of unit painting and present to J-RAB.
- Joe explained to J-RAB members and Legal Aide how items do have the potential to move around within the 5-year plan. Ms. Calhoun expressed that CMHA keep J-RAB members informed of all changes that may take place.
- Ms. Calhoun reported a unit at San Marco with massive bed bug infestation. She asked if CMHA still had the bed bug trailer. Ms. Flowers said Yes and that it does go out on a regular basis. Marquita also suggested that she would create a schedule of when it will be coming to each building and send it to J-RAB.
- Ms. Mimms suggested cabinets in the common Kitchen at the Redding need to be replaced. Joe will consider for a capital item.
- Joe met with Simplex Grinnel today regarding the call for aid buttons. Waiting on a final report. Will send report to Ms. Simms.
- Redding – sparks have been coming from plugs and switches at different places in the building, especially the 9th floor lobby. Electrical was updated in 1998-2000.
- Marquette Manor – Fire dept. call button goes off all the time. Joe to research for a capital item.
- CMHA is having issues with getting information on utility usage. May need to add on an authorization form so CMHA can request usage information.
- Marquette Manor – ceiling tiles are out again.
- Redding – brown ceiling tiles throughout still need to be replaced.
- San Marco – there are still 19 units without new carpet. All other units have been replaced.
- Marquette Manor – There has been an issue with residents taking down the fire alarms. Marquita to address the specific resident incidents.
- Summary of Changes will be mailed to each resident when the Annual Plan goes out for public comment.
- Marquita informed everyone that CMHA would be doing a full lease signing this year for every resident. If the resident makes a request for CMHA to come out to have it done on site; Marquita will review each request and make arrangements on an individual basis.

Joe suggested that maybe next year we visit at least one meeting at each Resident Council to promote more feedback on the Annual Plan Capital Items.

**ANNUAL PLAN COMMENTS FOR FY2018:
SUMMARY OF COMMENTS TO PLAN AND CMHA'S RESPONSES**

CMHA provides the following written comments regarding the Annual Plan, the proposed changes to the Plan and the related documents. In addition to providing the following response, CMHA would also provide the parties with an opportunity to meet and discuss their comments in a face-to-face meeting, provided that the comments were submitted prior to the March 28, 2018 public hearing.

The following is a summary of the comments and CMHA's response to the comment(s). Similar comments have been paraphrased and grouped together with CMHA's response. The text of all comments is included as an attachment to this summary.

RELOCATION

During the course of the Public Comment Period, the Cincinnati Metropolitan Housing Authority ("CMHA") received the following anonymous comments regarding the Annual Plan and related documents.

RELOCATION FOR TENANTS IN RAD PROPERTIES

Policy Referenced: CMHA has submitted several applications to HUD for participation in the Rental Assistance Demonstration Project ("RAD"). The following comments relate to relocation under the program:

- **02/25/2018 Anonymous Comment 1:** As far as the relocation goes, what's basically the overall plan to keep some of our residents from being left out? Where would they be sent if you have no place of residence for them?
- **02/25/2018 Anonymous Comment 2:** We want one-to-one replacement not five-to-one replacement. We want 100% replacement.

Response

Resident Right to Return: The Cincinnati Metropolitan Housing Authority identified the Rental Assistance Demonstration (RAD) Program as a viable model to transform the public housing portfolio.

RAD Program rules prohibit any permanent involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the property once construction has been completed and the units meet housing quality compliance. The period during which residents may need to be temporarily relocated will be determined by the project or site. Therefore, there will be a site specific plan of relocation based on the type of rehabilitation or construction done at the site. Residents will have the opportunity to provide input into their specific site relocation plan. Residents will be provided with a transition manual that outlines their right to return to the site. Moreover, CMHA anticipates that some properties will require little relocation. These properties have undergone extensive modernization prior to RAD conversion.

One-to-One Replacement Housing: There are no plans to reduce affordable housing units by a rate of 5 to 1. CMHA does not anticipate a significant reduction in the total number of available housing units.

**SPONSORED GUEST PROVISION
ASSET MANAGMENT**

Policy Referenced: the Cincinnati Metropolitan Housing Authority received a comment related to the amount of time a visitor may be allowed to stay on the premises of a CMHA tenant. This comment also seems to be in response to changes with the visitor policy that allow for a "Sponsored Guest."

The following comment was received concerning this provision of the guest provisions on the CMHA Residential Dwelling Lease and the Admissions and Occupancy Plan.

03/09/2018 T. Tolley (Resident): My suggestion for the proposed changes to the ACOP:

Section IV-D: I suggest the period a CMHA approved guest being allowed to stay be extended to 21 or 30 days, but no longer than that. Unless the guest has proof that they are getting our (CMHA) apartment or going to a group home where the tenant could ask for a 14-day extension.

Section III- B: Tenant Selection and Assignment Plan: I suggest that the applicant be given five (5) full business days to respond about a vacant unit. If the applicant has a problem (line an illness, car problems, death in the family, problem getting their money from Social Security, or any other problems) and not just taken off the list or being added to the bottom of the list.

Response

CMHA attempts to balance its guest policy with the concerns of the current residents of CMHA housing. Often, the current residents consider that the eligibility process provides a method of ensuring the safety of the CMHA community. It appears from the comment, that the tenant would like a CMHA-approved extended guest stay to be given for reasons related to the plan for future housing at CMHA apartment or if the guest is needed to provide caregiving. The CMHA *Sponsored Guest* Policy will allow for limitations on the guest's stay in the tenant's residence. CMHA will consider adding the suggested limitations as part of the approval process.

ASSET MANAGMENT

CMHA SHOULD ADDRESS POOR CONDITIONS AND DEFERRED MAINTENANCE ISSUES.

Policy Referenced: CMHA received a comment related to condition of CMHA's asset management properties. This comment was construed as relating to the Asset Management Admissions and Occupancy Plan, as well as, the CMHA Capital Plan.

- **03/09/2018 Legal Aid Society ("LAS"):** Last year, Legal Aid provided comment to CMHA regarding the deteriorating condition of many of CMHA's Public Housing properties. We are disappointed to report that Legal Aid has continued to receive numerous complaints about bad conditions at CMHA properties and deferred maintenance. In fact, many of our advocates have presented and currently are representing CMHA tenants and tenant groups who have repeatedly requested maintenance and have received no response or inadequate responses from CMHA. The Executive Director for CMHA recently stated that CMHA has never had a maintenance request open over 30 days, but Legal Aid has seen that this is not the case.

While we appreciate the funding difficulties that CMHA has experienced over this time period, we feel that CMHA need to prioritize the conditions inside its public housing units. CMHA has placed much emphasis on curb appeal and being good neighbors during this time, but needs to put more future emphasis on providing decent safe and sanitary housing to the tenants living inside its properties.

In addition, Legal Aid continues to be troubled by CMHA's interactions with the City of Cincinnati Building and Health Departments, as well as the County Health Department and other municipal inspectors. While these municipalities may lack the legal authority to fine CMHA, as the largest landlord in the county, CMHA should be working with these government inspectors to clear all building and health code violations in its public housing units. CMHA holds its HCV landlords to this standard, it should hold its own public housing units to the same standard.

Response

The Cincinnati Metropolitan Housing Authority does value all of its properties that it owns and operates. The average age of the CMHA asset management housing stock is 74 years. CMHA works very hard at maintaining both the interior and exterior property within the budget constraints that we are faced with on a day to day basis. Furthermore, it appears that CMHA may be faced with additional funding burdens by the new proposed federal budget from the current administration. The following is a snap shot of what is being proposed:

Capital Funds – No Funding equating to a 100% decrease
Public Housing Operating Fund – 27% decrease

If these decreases continue to happen along with the current year's decrease, CMHA will continue to face hurdles as it pertains to the day to day operation of our Asset Management Department. It seems to be clear that Legal Aid and others have concerns about the day to day maintenance operation, but as you can see CMHA could use a lot of advocacy help from Legal Aid and others at the local and federal level for more funding to help maintain an aging affordable housing stock.

In addition, to some of the maintenance concerns, Legal Aid states the Executive Director, which the current title is the Chief Executive Officer, stated CMHA has **NEVER** had a work order over thirty days. This statement is absolutely preposterous. In a letter dated November 15, 2017 the Chief Executive Officer stated that "Currently, CMHA has no work orders that are 5, 4, 3, or even 2 months old." As you can see the word **CURRENTLY** does not span over the 80 plus years the housing authority has been in existence. CMHA does not defer maintenance. We address work orders as they are present to us through the proper systems.

According to your letter, it is implied that CMHA does not provide a correspondence/reference ID when residents call in work orders. The Work Order Center provides a work order number to residents calling in, at the point, when a work order has been generated. Another area of your letter portrays CMHA as charging residents for maintenance repairs they are not responsible for. CMHA, as you know, has a robust appeals process that any resident can request if they feel a charge has been added to their account erroneously. Furthermore, CMHA understands the financial constraints of our residents and only adds charges that are resident caused at the cost listed on the published Maintenance Charge Schedule. Additionally, if a charge is imposed on a resident, the charge may be paid in installments with the resident's rent charge to lessen the financial impact on the family.

The Cincinnati Metropolitan Housing Authority is forging relationships with the local municipal departments including the Cincinnati Building and Health Departments. The motivation for developing a collaborative relationship with these departments is not motivated by the local municipal governments inability to "fine CMHA." Simply stated, CMHA is going about the business of providing quality affordable housing in the Hamilton County area and that includes meeting with local officials when concerns arise. In fact, CMHA has recently conducted the following meetings with local governmental bodies:

City of Cincinnati Health Department – 1/11/2018 and 1/23/2018
City Collaborative with all Departments Combined – 1/26/2018
City of Cincinnati Buildings and Inspections Department – 2/9/2018
City of Cincinnati Police Department (Districts 3, 4 and 5) – 3/7/2018, 3/9/2018
*Pending Meeting with City of Cincinnati Public Services Department – 3/15/2018

As you can see, CMHA is diligently working with the City of Cincinnati and the aforementioned departments to continue to address any building code and health violations as they are brought to our attention.

HOUSING CHOICE VOUCHER MANAGEMENT

PROBLEMS WITH HQS ABATEMENT ISSUES

Policy Referenced: the Cincinnati Metropolitan Housing Authority received a comment related to the abatement of housing assistance payments due to a landlord's failure to maintain housing quality standards.

The following comment was received concerning this provision of the HCV Administrative Plan:

03/09/2018 Legal Aid Society ("LAS"): Legal Aid has become concerned with CMHA's current policy and procedure regarding the HQS inspection and abatement process. Legal Aid has received an increase in eviction cases involving private landlords who file eviction actions against tenants because CMHA recently abated the rent to the landlord for HQS violations.

Legal Aid has heard from its clients that many landlords have decided not to rent to tenants with vouchers due to frustrations over the HQS policy and procedure. For example, Legal Aid has seen cases where a landlord has made all the repairs noted on a failed inspection letter and has contacted CMHA for a re-inspection, but CMHA has not responded. Legal Aid has also seen instances where CMHA abates the rent to the landlord over a very minor issue that should not result in abatement and termination of the HAP contract. For example, Legal Aid currently has a case where CMHA abated the rent to the landlord because a small fraction of the driveway needed repair. In this case, the landlord sued the tenant for eviction due to the abatement. The tenant now has to find a house that will accept her voucher during a pending eviction. This places great hardship on low-income individuals and families who need to quickly locate affordable housing in a community that already has a shortage of affordable housing.

Legal Aid is pleased that CMHA holds accountable landlords who violate HQS requirements. However, Legal Aid would like to see CMHA implement a fairer process and procedure for minor HQS violations that do not result in termination of the HAP contract and a tenant being forced to move from their home.

Response

The Cincinnati Metropolitan Housing Authority is encouraged that the Legal Aid Society is championing the rights of tenants in instances where there are wrongful evictions by private landlords. As you know, a tenant should not be evicted for failure to pay the landlord's portion of the rent during the time that a property is under abatement from the program. If LAS finds that a particular landlord engages in that pattern of conduct, then please alert the Voucher Management Program.

CMHA focus is on health and safety items in accordance with HQS. What may be considered a minor offense, such as a crack in the driveway, would constitute an HQS violation if it is deemed a trip hazard. Accordingly, repairs must be made by the due date, or an extension may be requested by the property owner prior to the due date for the repairs. These options provide property owners the options to avoid the abatement of the housing assistance payment ("HAP").

In response to the allegation of a property owner not being able to notify CMHA about repairs being made, CMHA has a Customer Service Department dedicated solely for addressing the concerns of the Housing Choice Voucher program. Additionally, re-inspections are automatically rescheduled after the initial failed inspection to eliminate the need for an owner to call the office. An owner may contact this department and speak with a customer service representative, or leave contact information so that a customer service agent can return the call in the order that it was received. Additionally, an owner may walk-in to the office and speak with both the housing specialist or a manager. Walk-ins are seen Monday through Thursday at the Voucher Management Offices located at 1635 Western Avenue during normal business hours.

MOBILITY PROGRAM

Policy Referenced: CMHA received a comment related to the administration of its mobility program.

03/09/2018 Legal Aid Society ("LAS"): For many years CMHA participated in a mobility program for HCV families. CMHA should reinstitute a robust program for HCV mobility. The goal of a mobility program is to enable families to find housing outside areas of low income concentration. The program is based on the proven concept that families have more success when they can live in safe neighborhoods with access to good schools, jobs and other amenities. A recent comprehensive analysis of this issue can be found at "The Effects of Exposure to Better Neighborhoods on Children" The program is based on the proven concept that families have more success when they can live in safe neighborhoods with access to good schools, jobs and other amenities

Unfortunately, things have moved in the wrong direction recently with CMHA's abandoning its commitment to HCV mobility. CMHA should reconsider its position and reinstitute the program.

Response

The Housing Choice Voucher program serves to provide choice to persons in the tenant based voucher program. CMHA is committed to ensuring that voucher holders have "choice" in their efforts in finding good "quality" affordable housing in Hamilton County.

CMHA believes the initiatives outlined in this response have worked to increase mobility for voucher holders.

A primary goal of CMHA's HCV program is to increase assisted housing choices. Currently, CMHA is accomplishing this goal by:

- a) CMHA has appointed a Landlord Outreach Coordinator who works diligently to recruit new owners for the HCV Program and work with current owners/landlord to assist in resolving any perceived issues that may arise.
- b) Increased outreach efforts to potential voucher landlords through its CMHA's Landlord Outreach Coordinator works with CMHA marketing to encourage an expanded pool of quality landlords to participate in the program.
- c) Increased outreach efforts to enhance the program image through community education, participation with local property owner groups, neighborhood agreements and participant compliance.
- d) CMHA has kiosks located in its HCV administrative office for owners and voucher holders who do not have computer/internet access. CMHA has found this service to be beneficial in many ways. Voucher holders are able to conduct a national or local search for units at their own convenience.

CMHA collaborated with HOME for over 14 years. Funding cuts ultimately eliminated HOME's program. Additionally, CMHA implemented a mobility program that mirrored HOME's efforts. CMHA experienced funding cuts that hampered our ability to maintain a third-party relationship for the mobility program. However, CMHA continues its de-concentration efforts to inform program participants of the benefits for leasing in diverse census tract as part of the briefing process. We agree with LAS that more should be done as a community. We welcome a partnership where we both can advocate locally and nationally for others to help fund this important effort.

DUE PROCESS FOR VOUCHER HOLDERS

Policy Referenced: CMHA received a comment related to the administration of its voucher management program and termination due to lack of "good standing."

03/09/2018 Legal Aid Society ("LAS"): Legal Aid is once again seeing HCV holders who are denied due process when their vouchers are found to be "not in good standing." In 2013, CMHA agreed to stop this practice, much as it had back in 2007. And yet, the practice continues. CMHA is required to give meaningful notice and a pre-termination hearing before CMHA takes adverse action against a participant. For example, Legal Aid was recently contacted by an HCV holder who had submitted an RTA, had the new apartment inspected and had passed rent reasonableness. She then received a notice that her RTA was being cancelled because she was "not in good standing." This happened just days before she was to move. There was no explanation for why she was "not in good standing," nor was there any explanation for how she could get back into good standing. There was no notice about how this determination could be contested. This shows complete disregard of the applicable regulations and of due process. If participants are found to "not be in good standing," the housing authority is required to immediately give them specific written notice of what the participant has done or failed to do that led to this status, and an opportunity to correct or contest this decision, prior to any adverse action being taken.

Response

CMHA strictly adheres to 24 CFR §982.555 in the administration of the Housing Choice Voucher program. This section outlines when a hearing is to be offered to a participant and when circumstances except the requirements of a hearing. As such, refusal to approve a request for tenancy approval does not require an administrative hearing. However, all families proposed for termination from the program are provided with reasons for the proposed termination and provided with the opportunity for an informal hearing.

CAPITAL FIVE YEAR ACTION PLAN

The following comments concerned capital improvements under the agency's 5-year Capital Plan.

CAPITAL PLAN IMPROVEMENTS

Policy Referenced: CMHA received a comment related to its planned improvements under the five-year capital plan.

03/09/2018 Anonymous Comment 1: In reviewing the Capital 5-year action plan work items I believe that staff should investigate possible capital improves in the following areas

1. Installing concrete pads for dumpsters

Possible long term savings

- This should reduce the number of totters used in many of the multi - family properties
- This should save on maintenance staff time to take those same totters back to the rear of the properties
- This should save cost in replacement and maintenance of the damaged and stolen totters

2. Installing cameras in all high-rise buildings for increase security

Possible long term savings

- Increase the effectiveness of security guards monitoring building entrances. Or possibly allow for the removal of security guards.
possible benefits
- Installing cameras on all floors and elevators to capture all activities for increase security
- Real time monitoring of all activities
- Storing of all events for play back if illegal activities are reported
- Hiring residents to help monitor buildings that they resident in

3. Upgrading or installing access control if not already installed in all hire-rise buildings to include tenant apt doors. Thought this may not be a cost savings if not already installed it will certainly be a cost savings in the future when you have to re-key an entire complex. It will also help with security.

Benefits

- Quick and easy change of access credentials
- Audit trail of all individuals who tried to gain entry/access to any door (employees and residents)
- Possible real time monitoring providing the ability to unlock doors remotely - this would provide a second benefit by reducing the number of call backs to

unlock doors when tenants lose their keys.

Response

During its meetings with residents on other topics, CMHA would often receive similar comments about these suggested items. CMHA reviewed these suggestions and provides the following response:

- Installing concrete pads for dumpsters:** Not all locations are conducive to concrete pad and dumpsters. CMHA will investigate and determine if this is possible and evaluate possible cost savings address by address.
- Installing cameras in all high-rise buildings for increase security:** CMHA currently has security cameras installed throughout many of our properties. We will investigate the potential for cost savings with the installation of cameras throughout our high-rise buildings vs the cost of security guards.
- Upgrading or installing access control if not already installed in all hire-rise buildings to include tenant apt doors:** CMHA currently has access control for the main building entrance of each of the high-rise buildings and mechanical high- security locksets securing each of the apartment doors. We will investigate possible cost saving by the installation of access control at the apartment doors.

SUMMARY

	<p>To all of those who provided comments to the Annual Plan, the Cincinnati Metropolitan Housing Authority considers that we have a shared vision for expanding the affordable housing footprint in Hamilton County through our voucher and asset management programs. Thank you for your response and review of the Annual Plan and interest in Cincinnati Metropolitan Housing Authority.</p>
B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, AISHA TZILLAH, the COMMUNITY DEVELOPMENT ADMINISTRATOR
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

CINCINNATI METROPOLITAN HOUSING AUTHORITY
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

CITY OF CINCINNATI

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

The Cincinnati Metropolitan Housing Authority's Annual PHA Plan for Fiscal Year 2018-2019
and the 5-year PHA Plan for Fiscal Years 2015 through 2019 is consistent with the City of
Cincinnati's 2015 - 2019 Consolidated Plan and the 2018 Annual Action Plan, pursuant to 24 CFR
Part 91.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warnings: HUD will
prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Aisha Tzillah

Signature



Title

COMMUNITY DEVELOPMENT ADMINISTRATOR

Date

15 February 2018

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, JOY PIERSON, the COMMUNITY DEVELOPMENT ADMINISTRATOR
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

CINCINNATI METROPOLITAN HOUSING AUTHORITY
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

HAMILTON COUNTY

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

The Cincinnati Metropolitan Housing Authority's Annual PHA Plan for FY 2018-2019 and the
5-year PHA Plan for Fiscal Years 2015 through 2019 is consistent with Annual Action Plan for
Hamilton County, pursuant to 24-CFR Part 91. It includes plans to develop new senior affordable
housing; redevelop vacant land that had been used for public housing; capital improvements to
existing public housing; and developing partnerships to address underserved populations

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
JOY M. PIERSON	COMMUNITY DEVELOPMENT ADMINISTRATOR
Signature	Date
	March 6, 2018

B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> <p>According to The Public Housing Capital Fund Program Final Rule published in the Federal Register October 24, 2013 (Docket No. 5236-F-02) this information is no longer included.</p>
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD EPIC 50075.2 approved by HUD August 16, 2017 CFP Five-Year Action Plan 2017-2021</p>