

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	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.

<b>A.</b>	<b>PHA Information.</b>																								
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>07/2019</u>          PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)          Number of Public Housing (PH) Units <u>5,365</u> Number of Housing Choice Vouchers (HCVs) <u>11,693</u> Total Combined Units/Vouchers <u>17,058</u>          PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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" data-bbox="159 1465 1599 1747"> <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>B.</b>	<b>Annual Plan Elements</b>																								

**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	2,497		901
Extremely low income <=30% AMI	2051	82.1%	
Very low income (>30% but <=50% AMI)	406	16.2%	
Low income (>50% but <80% AMI)	40	1.7%	
Families with children	1123	44.96%	
Elderly families	48	1.92%	
Families with Disabilities	589	23.58%	
Race/ethnicity: White	475	19.02%	
Race/ethnicity: Black	2000	80.06%	
Race/ethnicity: Native American	12	.48%	
Race/ethnicity: Asian	3	.12%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	1252	50%	
2 BR	532	21%	
3 BR	361	14%	
4 BR	198	8%	
5 BR	92	4.5%	
5+ BR	62	2.5%	

Is the waiting list closed (select one)? Yes

If yes:

How long has it been closed (# of months)? January 2017 (23)

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	11,419		912
Extremely low income <=30% AMI	4568	40%	
Very low income (>30% but <=50% AMI)	3426	30%	
Low income (>50% but <80% AMI)	3425	30%	
Families with children	6075	53.20%	
Elderly families	632	5.53%	
Families with Disabilities	1955	17.12%	
Race/ethnicity: White	1601	14.02%	
Race/ethnicity: Black	9610	84.16%	
Race/ethnicity: Native American	233	1.8%	
Race/ethnicity: Asian	21	.02%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR (Includes 21-0 BR)	7101	62.19%	
2 BR	2745	24.04%	
3 BR	1208	10.58%	
4 BR	308	2.70%	
5 BR	52	.40%	
5+ BR	7	.09%	

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)

**HOUSING CHOICE VOUCHER [HCV] PROGRAM**  
**Summary of Proposed Changes to the 2019-2020 Administrative Plan**

**1. Chapter 2 – Part H Applying for Admission**

Added language to clarify that a full application has to be completed prior to final determination of eligibility.  
A full application must be completed prior to final determination of eligibility for the HCV program.

**2. Chapter 4 – Part H Local Preferences**

Language added for preference for families a part of a RAD conversion of AM/LIPH unit.  
Displaced preference for Asset Management/LIPH families in a hard to house situation, RAD conversion of AM/LIPH unit or due to demo/disposition of units. \*\* 80 points

**3. Chapter 6 Verification of Allowable Deductions from Income**

Language added to clarify eligibility for deduction.  
If the childcare provider is an individual, s/he must provide a statement certifying of the amount(s) they are receiving from the family for their child-care services. For persons receiving services from a child-care center, written proof of monies **actually paid** to the child-care center must be received to be provided the deduction.

**4. Chapter 13 Verification of Tenant Paid Utilities**

Language was removed stating that CMHA will verify tenant paid utilities are on in the name authorized adult household member.  
CMHA will verify at the annual recertification appointment that tenant-paid utilities are in the name of an authorized adult household member within the family.

**5. Chapter 14 Moves with Continued Assistance**

**Part C Issuance of Voucher. Language changed to coincide with current procedures. CMHA no longer conducts a transfer interview.**  
Subject to the restrictions on moves, if the family has been re-certified within the last 12 months, CMHA will issue the voucher to move upon request from the family or abatement of a unit for owner responsible HQS deficiencies with no family responsible items to repair. If the family does not locate a new unit within the 90-day term of the voucher, they may remain in the current unit so long as the owner permits.

**6. Chapter 20 Housing Types**

**Project Based Vouchers**

Added New Regulatory language regarding PBV assistance changes under HOTMA and RAD PBV Guidance for Converting Public Housing to PBV Assistance.

Highlights include:

- Awards can be made outside of RFP or Competitive Bid Process
- CMHA may allow for an initial PBV contract of up to 20 years
- Identifying parties of PBV Hap Contract
- Defining PHA Owned property
- Determination of Reasonable Rent/Responsible Entity

**7. Chapter 20 Rental Assistance for Displaced Persons due to Project-Based Vouchers**

CMHA may require the Owner to establish a relocation plan and provide assurances of the following:

- A. As a landlord of residences receiving PBV assistance, Owner must provide a Relocation Plan that comports with the 24 CFR §983.7, which requires the items outlined in Exhibit “A” to this Addendum.
- B. Owner agrees that should the Department of Housing and Urban Development (“HUD”) or CMHA, or any similarly situated state agency find that provisions of the URA were not followed then Owner is responsible for the following:
  1. Owner agrees that if HUD or CMHA determines that a current or former tenant did not receive the full amount of relocation assistance required, and then Owner shall ensure the proper payment as specified by HUD or CMHA is promptly made.
  2. Any claims or complaints arising out of the relocation of tenants for Owner’s project will be the sole monetary and programmatic responsibility of Owner.
  3. Owner shall retain responsibility of ensuring the items outlined in its Relocation Plan are performed and will bear the cost of any damages arising from the failure to perform these obligations.

**8. Chapter 20 Housing Types**

Language added to clarify completion of FSS Contract

**Early Completion of Family Self-Sufficiency Contract**

The purpose of this document is to provide guidance on Early Contract Completion of the Family Self – Sufficiency Program and Requesting Escrow Balance Funds. This guide ensures that the Early Completion of the Family Self – Sufficiency Contract of Participation terms and conditions are in accordance with the US Department of Housing and Urban Development’s compliance, regulations, requirements, and does not release the PHA or family from the original responsibilities of the Family Self – Sufficiency (FSS) Program Contract of Participation. It allows the participants to complete their goals and responsibilities early and benefit from self – sufficiency. In addition, allows for other Housing Choice Voucher Participants the opportunity to benefit from the FSS program.

All family members must:

1. Comply with the terms of the lease
2. Become independent of welfare assistance and remain independent of welfare assistance for at least 12 consecutive months before the contract expires
3. Be employed for at least 12 consecutive months prior to request of “Early Contract of Participation” and working 32 - 36 hours weekly. (Full time)
4. Complete an early completion assessment questionnaire/Exit Survey Process to determine whether or not self – sufficiency has been met and the individual has the tools to remain self – sufficient
5. If participation in the HCV program, the family must comply with the family obligation under the HCV program (Housing Choice Voucher Program “Things You Should Know”) and live in the jurisdiction of the HA that enrolled the family in the FSS program at least 12 months from the effective date of this contract, unless the initial PHA has approved the family’s request to move outside its jurisdiction under portability.

If any member of the family does not meet his or her responsibilities under this contract, the family will not receive the money in its FSS escrow account, at this time.

NOTE: They can continue on the Family Self – Sufficiency Program for the duration of the Contract of Participation in pursuing their goals.

The family (Head of Household) can request up to 50% of their escrow based on pursuing their goals in achieving self – sufficiency such as... car repair or startup cost for participant owned company or business.

**Completion of the Contract of Participation:**

Completion of the contract occurs when the HA determines that:

1. The family has fulfilled all of its responsibilities under the contract; or
2. 30 percent of the family’s monthly adjusted income equals or is greater than the Fair Market Rent amount for the unit size for which the family qualifies.

**FINANCIAL RESOURCES:**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2018 grants)</b>		
a) Public Housing Operating Fund	\$23,503,617	
b) Public Housing Capital Fund	\$8,906,378	
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$77,430,743	
d) Other Federal Grants (list below)		
e) Family Self Sufficiency	\$285,202	Section 8 Supportive Services
f) NSP2		NSP2 development
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
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	\$13,599,383	Public Housing Capital Improvements
e) HOPE VI Revitalization	\$0	
<b>3. Public Housing Dwelling Rental Income</b>		
a) Rental Income	\$9,737,767	Public Housing Operations
<b>4. Other income (list below)</b>		
a) Excess Utilities		Public Housing Operations
b) Non-dwelling Rental	\$43,513	Other
c) Interest & Other Income	\$647,062	Other
<b>5. Non-federal sources (list below)</b>		
<b>Total resources</b>	\$134,153,665	

**VAWA UPDATE:**

During calendar year 2018, CMHA received **128** 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 1 Transfer.)

**OPERATION AND MANAGEMENT:**

**Summary of Proposed Changes to the 2019-2020 Admissions and Occupancy Policy (ACOP)**

**Introduction:** CMHA added clarifying language to the ACOP concerning the applicability of the policies and procedures to the Asset Management program. Such policies and procedures are meant to solely apply to the low income public housing program managed by CMHA. Properties managed by the CMHA subsidiaries and instrumentalities are governed by their individual Tenant Selection Plans.

**Proposed Insertion:** Admissions and Continued Occupancy Policy governs the HUD-assisted public housing operated by the Cincinnati Metropolitan Housing Authority. These policies and the criteria for admission, determination of eligibility, and local preferences set forth herein is meant to apply solely to CMHA properties managed by CMHA as part of its asset management program. Properties managed by CMHA subsidiaries or instrumentalities may have other policies, procedures and criteria established by their individual Tenant Selection Plans.

**Section II - Eligibility for Admission and Processing of Applications:** CMHA added clarifying language to the ACOP concerning the applicability of the admissions and selection criteria to properties managed by CMHA subsidiaries or instrumentalities.

**Proposed Insertion:** The criteria for admission, determination of eligibility, and local preferences set forth in this Section apply solely to CMHA properties managed by CMHA as part of its asset management program. Properties managed by CMHA subsidiaries or instrumentalities may have another set of criteria established by their individual Tenant Selection Plans.

**Section V – Transfer Policy:** General Transfer Policy: CMHA added clarifying language to the ACOP concerning the applicability of its General Transfer Policy to properties managed by CMHA subsidiaries or instrumentalities.

**Proposed Insertion:** 3. The Transfer Policy as set forth in the CMHA Residential Dwelling Lease and ACOP applies solely to the CMHA properties managed under its Asset Management Program. This policy does not apply to properties that are managed under other CMHA subsidiaries or instrumentalities. These properties may have a separate admission and transfer process.

**Section V – Types of Transfer:** CMHA has implemented the following changes to its Transfer Policy, which now include an Incentive Transfer Category as part of its Transfer

**A. General Transfer Policy**

1. It is CMHA's policy that transfers will be made without regard to race, color, sex, religion, creed, national or ethnic origin, age, to actual or perceived sexual orientation, gender identity, familial or marital status, handicap or disability. Residents can be transferred to accommodate a disability.
2. **The good cause standard applicable to new admissions for refusal of a housing offer shall also apply to transfers.**
3. **The Transfer Policy as set forth in the CMHA Residential Dwelling Lease and ACOP applies solely to the CMHA properties managed under its Asset Management Program. This policy does not apply to properties that are managed under other CMHA subsidiaries or instrumentalities. These properties may have a separate admission and transfer process.**

**B. Types of Transfers**

This policy sets forth the transfer categories. Priority for transfer, and the order in which families are transferred, shall be subject to the hierarchy, by category, set forth below.

1. Emergency Transfers are mandatory. When the unit or building conditions poses an immediate threat to resident life, health or safety, as determined by CMHA, an emergency transfer will be required. Emergency transfers within sites or between sites may be made to: permit repair of unit defects hazardous to life, health, or safety; or to alleviate verified disability problems of a life threatening nature. Refusal of an immediate transfer offer, without good cause, will result in lease termination.

Emergency transfers shall take priority over new admissions.

2. The following administrative transfer will be deemed emergencies. They include mandatory transfers to: provide housing options to residents who are victims of federal hate crimes<sup>1</sup> or extreme harassment; **or to witnesses of crimes,<sup>2</sup> or to victims of domestic violence, dating violence, stalking, or sexual assault<sup>3</sup>, or to** alleviate verified disability problems of a serious (but not life-threatening) nature; permit portfolio conversion, modernization or demolition of units; or to permit a family that requires a unit with accessible features to occupy such a unit. Residents will receive three transfer offers.

Refusal of all three transfer offers, without good cause, may result in the removal of the household from the transfer list for voluntary transfers, or lease termination in the case of a mandatory transfer.

Emergency transfers shall take priority over new admissions.

Requests for these transfers will be made to the property manager. The resident shall provide the necessary documentation to substantiate the need for such a transfer. Transfers may also be initiated by CMHA (e.g. moving a person with mobility problems to a unit with accessible features).

3. Administrative Transfers are mandatory transfers within or between sites to correct serious occupancy standard problems (over or under CMHA's standards) as described below. Residents will receive three transfer offers. Refusal of all three transfer offers, without good cause, may result in the removal of the household from the transfer list for voluntary transfers, or lease termination in the case of a mandatory transfer.

Category 2 Administrative transfers will take priority over new admissions.

Category 2 transfers to correct occupancy standards will only be made if the family size is so small that it includes fewer persons than the number of bedrooms, or so large that the household members over age 3 would equal more than two persons per bedroom. These transfers are mandatory.

If a family's size is between the smallest and largest size permissible for the unit, the family may request a transfer, but it shall be considered a Category 3 transfer.

Transfers within sites or between sites to correct and avoid concentration of the most economically and socially deprived families or to correct occupancy standards (voluntary if the family is between the minimum and maximum occupancy standard but the family requests a transfer, e.g. to permit older children of the opposite sex to have separate bedrooms). Residents will receive three transfer offers. Refusal of all three transfer offers, without good cause, may result in the removal of the household from the transfer list for voluntary transfers, or lease termination in the case of a mandatory transfer.

Category 3 Administrative transfers will not take priority over new admissions. They will be processed at the rate of one transfer to four admissions.

Whenever feasible, transfers will be made within a resident's preferred geographical area.

**C. Processing Transfers**

1. A centralized transfer waiting list will be administered by CMHA's Relocation Department. The administration of the centralized transfer list will be managed and processed by date and time of submission. Emergency transfers, as defined by this Section, will be given priority over other date and time transfers. Managers are responsible for submitting requests for transfer, including necessary documentation, to the Relocation Supervisor.
2. Transfers will be sorted into their appropriate categories by the Relocation Department staff. Transfers will be made in the following order:
  - a. Emergency transfers; Administrative Transfers Other Date and Time Transfer SubmissionsWithin each category, transfer applications will be sorted by the date the completed file (including any verification needed) is received from the manager.

<sup>1</sup> Following consultation with Housing Opportunity Made Equal that such a transfer is appropriate.

<sup>2</sup> Following consultation with and upon recommendation of the local prosecutor that such a transfer is appropriate and recommended.

<sup>3</sup> The individual seeking the transfer may provide supportive referrals from a third-party social service agency, the local prosecutor or law enforcement. The procedure for a VAWA emergency transfer is outlined in the Emergency Transfer VAWA Plan, which is an addendum to this ACOP.

3. Administrative Transfers include the following: Transfers to correct occupancy standards may be recommended at time of recertification or interim re-determination. This is the only method used to determine over/under housed status.
4. Residents in a Category 2 over/under housed status will be advised in their 30-day *Notice of Result of Recertification* that a transfer is recommended and that the family has been placed on the transfer list.
5. Split-family transfer requests will be processed in accordance with the regular admissions process. Families that wish to split into two separate households will be treated as a new admission for purposes of their placement on the Waiting List.
6. Category 3 Administrative transfers will be processed with new admissions using a ratio of one transfer for every four new admissions. This ratio is discretionary and will be reviewed at least annually to determine its effects on vacancy.

**D. Incentive Transfers**

Incentive transfers are offered to non-scattered site residents, located at the Winton Terrace, Findlater Gardens, and Millvale sites, who have a good tenancy with CMHA, as described in the *Incentive Transfer Guidelines*, and who have requested to move to scattered site units. Incentive Transfers are made without regard to their race, color, sex, religion, creed, national or ethnic origin, age, to actual or perceived sexual orientation, gender identity, familial or marital status, handicap or

1. Resident requests for incentive transfers should be made to the Property Manager. For a resident to be considered for an incentive transfer, the following conditions must be met:
  - a. Residency in a non-scattered site CMHA community for at least two years.
  - b. No late rental payments within the previous 12 months or any legal action for non-payment of rent in the past two years.
  - c. No history of disturbances that resulted in lease violations or violence toward staff or neighbors as indicated by notices of lease violation.
  - d. No history of criminal activity, including drug-related criminal activity by family members or guests;
  - e. No other lease violations for which CMHA has commenced legal action for lease termination;
  - f. Good housekeeping record for the past two consecutive years;
  - g. Ability to obtain utilities
  - h. No history of repeated lease violations..
  - i. Successful completion of CMHA's Good Neighbor Program.

CMHA will remove a resident's name from the Incentive Transfer Wait List should the family violate any of the terms set forth above, while waiting for a unit to become available for a transfer.
2. Incentive transfers are Category 2 Administrative transfers. No exceptions will be granted to the good record requirement for incentive transfers.
3. A Manager's failure to process an Incentive Transfer request, or the denial of an Incentive Transfer is subject to the Grievance Procedure.

**E. COST OF TRANSFERS**

1. CMHA will pay for the cost of a transfer when a resident is required to move as a result of the approval of portfolio conversion, demolition, modernization of their unit, or in the case of some emergency transfers. The resident shall bear the cost associated with any other type of transfer.

Section IX – Family Self Sufficiency Program: CMHA has implemented a Family Self Sufficiency Program for residents of Asset Management Housing.

**PHILOSOPHY**

The overall goal of the Family Self Sufficiency (FSS) Program is to promote economic self-sufficiency to program participants through partnerships with Social Service Providers in Hamilton County.

**POLICY**

Family Self Sufficiency staff will work with participating families to identify their strengths and barriers. Together they will establish goals that lay the foundation for the families to achieve economic self-sufficiency.

**FSS PROGRAM OBJECTIVES**

The overall plan of the FSS Program is to achieve the following objectives:

Introduce FSS to all families who are eligible to participate with the understanding that the commitment to change "begins from within."

Implement a needs assessment to identify each family's strengths and barriers. Establish interim goals that lay the foundation for the final goals of economic self-sufficiency of each family joining FSS.



## Summary of Proposed Changes to the 2019-2020 Residential Lease Agreement

**Section VIII. Entry to Premises During Tenancy:** CMHA clarified the right of entry into the residential unit for purposes of repairs.

2. CMHA may enter Tenant's dwelling unit at any time without advance notification when there is reasonable cause to believe that an emergency exists, such as a defective or disconnected smoke detector; orders from a government agency (e.g. City or County Health/Building Department); exigent health and safety orders issued as part of an inspection.

**Section V – Tenant Obligations:** CMHA inserted a few clarifying items to the Tenant Obligations.

37. Signs and postings in the CMHA common spaces are subject to prior approval.

**Section X – Termination of Lease:** CMHA added a clarification concerning the termination of the Residential Dwelling Lease Agreement due to non-payment of rent.

2. Failure to pay utility bills when Tenant is responsible for paying such bills directly to the supplier of utilities; CMHA may issue a Notice of Termination upon receipt from the utility supplier that service is due to be terminated;

**(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.

**B.2**

**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

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Designated Housing for Elderly and/or Disabled Families.
- Conversion of Public Housing to Tenant-Based Assistance.
- Conversion of Public Housing to Project-Based Assistance under RAD.
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- 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.
- Creation of affordable single family homeownership programs.
- Consideration of commercial retail and office space for mixed use development
- 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 continue to develop strategies for the creation of a home ownership both affordable and possible market on vacant parcels located in the West End neighborhood of Cincinnati, owned by CMHA.

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

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 – CMHA is evaluating Scattered Site properties for conversion to the RAD program utilizing other possible funding sources which could include Tenant Protection Vouchers "TPV", Project Based Vouchers "PBV" or possible disposition through HUD program section 18.

Rental Assistance Demonstration Program - Over the next several years, CMHA plans to convert all of its public housing through the Rental Assistance Demonstration (RAD) Program. 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.**

From January 2, 2018 to November 8, 2018 the United States Department of Housing and Urban Development awarded the Cincinnati Metropolitan Housing Authority (CMHA) the eleven Commitment to Enter into a Housing Assistance Payment Contracts (CHAPs) 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, Project Based Rental Assistance (PBRAs) under the guidelines of PIH Notice 2012-32, REV-1 and any successor PIH Notices, rules and regulations, or through Section 8 Project-Based Vouchers (PBV) assistance in accordance with PHH 2018-04 (HA). 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-1. These resident rights, participation, waiting lists and grievance procedures are appended to this Attachment. Additionally, CMHA is currently compliant with all fair housing, and civil rights requirements.

RAD 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:

Dev.	PIC ID	Conv Type	Trans. Assist.	0 Bed	1 bed	2 Bed	3 Bed	4 Bed	5 Bed	6 Bed	Total
Marianna Ter	OH004-000204	PBRA-Family	No	0	14	27	27	4	4	0	76
Scattered Sites	OH004-000205	PBRA-Family	No	0	4	12	8	0	0	0	24
Findlater Gardens Phase 1	OH004-000210	PBRA-Family	No	0	9	44	45	10	0	0	108
Findlater Gardens Phase 2	OH004-000210	PBRA-Family	No	0	25	24	22	35	2	2	110
Evanston	OH004-000211	PBRA-Family	No	0	100	0	0	0	0	0	100
Park Eden	OH004-000213	PBRA-Family	No	6	169	1	0	0	0	0	176
Stanley Rowe Towers	OH004-000214	PBRA-Family	No	0	22	62	35	9	2	0	130
Pinecrest	OH004-000216	PBRA-Family	No	0	178	12	0	0	0	0	190
Sutterview	OH004-000218	PBRA-Family 86 units/Sect. 18 PBV 28 units	No	0	23	41	27	23	0	0	114
Scattered Sites	OH004-000201/000208	PBRA-Family	No	0	17	17	33	0	0	0	67
Scattered Sites	OH004-000203	PBRA-Family	No	2	36	36	1	0	0	0	75

**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 PBRA's 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 or local law provides for a shorter period of time, such shorter period shall apply.

**6. 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.

**7. 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.

**8. 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.

**9. Relocation Plan.** CMHA anticipates a need for relocation for Sutterview Phase I AMP 218. At this time CMHA does anticipate the need for relocation at the following developments; Marianna Ter AMP 204, Scattered Sites AMP 205 24 units, Findlater Gardens Phase I and Phase II AMP 211, Evanston AMP 211, Liberty St Apt AMP 214, 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	Effectuated 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	122 & 130 McMicken Ave	OH004-40	Dispo	Planned	8/19	5 Units	Partial	7/19-7/20	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

201	4048 Ledgewood	OH004-39	Dispo	Planned	7/19	12 Units	Partial	7/20-7/21	CMHA does not plan to reduce its housing unit count
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	OH004-06	Demolition	Submitted	9/18	53 Units	Partial	9/18-9/20	
217	Millvale	OH004-05	Demiltion	Planned	6/19	37 Unirts	Partial	6/19-6/21	
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	
	Laurel Homes	City West	Dispo	Amend approval	9/19	Land Only	Partial	9/19-9-20	
	Grandview	OH004-39	Dispo	Planned	10/18	Land Only	Partial	1/19-1/20	

**DESIGNATED HOUSING FOR ELDERLY AND/OR DISABLED FAMILIES**

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	8	Pending Submission	
AMP 202	Various Addresses	Scattered Sites	7	Pending Submission	
AMP 203	Various Addresses	Scattered Sites	7	Pending Submission	
AMP 204	Various Addresses	Scattered Sites	6	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	7	Pending Submission	
AMP 207	Various Addresses	Scattered Sites	8	Pending Submission	
AMP 208	Various Address	Scattered Sites	15	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	15	Pending Submission	
AMP 218	Marquette/Suterview	Marquette	140	Pending Submission	

<p><b>B.3</b></p>	<p><b>Civil Rights Certification.</b></p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>B.4</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:  (c)  The Plante Moran Audit team issued an unqualified opinion with no material findings and no material weaknesses in internal controls.</p>
<p><b>B.5</b></p>	<p><b>Progress Report.</b></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><b>CMHA Goals and Objectives:</b></p> <p>Strategic Goals</p> <ol style="list-style-type: none"> <li>1. Efficiency and Fiscal Responsibility: Develop a strong and profitable financial model and be good stewards of public funds.</li> <li>2. Improve Processes and Performance: Manage an efficient and cost-effective internal operation.</li> <li>3. Revive our Communities: Create and generate partnerships that promote healthy and stable neighborhoods in Hamilton County.</li> <li>4. Quality Customer Service: Provide superior customer services and quality products.</li> <li>5. Implementation of RAD.</li> <li>6. Reduce our maintenance expenses through the implementation of RAD</li> </ol> <p>Annual Goals:</p> <ol style="list-style-type: none"> <li>1. Increase PHAS points in the Asset Management and maintain High Performer in HCV.</li> <li>2. Continue to train staff on different funding models that deal with RAD conversion</li> <li>3. Partner with Community Based Organizations and state agencies to collaborate on financial goals for our families.</li> <li>4. Continue to update policies and SOP's.</li> <li>5. Improve internal and external communications.</li> <li>6. Continue to increase family income in the HCV Family Self-sufficiency Program.</li> <li>7. Continue to recruit new property owners for the HCV Program.</li> <li>8. Project Base Assistance for up to 20% of funded HCV voucher baseline.</li> <li>9. Assess, renovate or modernize asset management units:</li> <li>10. Continue to work towards converting 100% of agency's Asset Management portfolio to a more sustainable model.</li> <li>11. 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.</li> <li>12. Implement green and sustainable housing initiatives such as; net/near zero, enterprise green and LEED.</li> <li>13. Continue to further fair housing throughout Hamilton County.</li> <li>14. Implement the new software YARDI.</li> <li>15. Continue to implement MTW like programs to improve resident's self-sufficiency, agency efficiency, and to improve program delivery to all customers.</li> <li>16. Improve security camera systems throughout the organization once funding allows.</li> <li>17. 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.</li> </ol>

18. Submit application when available for MTW.
19. Continue affordable housing developments.
20. Work toward strengthening relationships with the City of Cincinnati.
21. Work toward strengthening relationships with Hamilton County.
22. Work toward strengthening relationships with the Greater Cincinnati Redevelopment Authority.
23. Strengthen partnerships with community groups such as: AHA, Legal Aide, HOME, CILO, LADD, Homeless Coalition, Strategies to End Homelessness, CBI, Poverty Collaborative, United Way, Housing Initiative, OKI, Greater Cincinnati Chamber of Commerce, Strive Partnerships, SORTA, CPS, CPD, CDF, J-RAB, MARC, Uptown Consortium, Hamilton County Re-Entry, Urban League, Santa Maria, Price Hill Will, Mercy Housing, Talbert House, NAACP, Greater Cincinnati Foundation, LISC, Regional Financial Institutions and Investors to accomplish the community wide goal of developing 40,000 affordable housing units in the Greater Cincinnati Region.
24. Strengthen partnerships with community businesses such as: Western Southern, Kroger, Procter & Gamble, Children's Hospital, Messer Construction, General Electric, Turner Construction, Janco and Nehemiah Manufacturing to accomplish the community wide goal of developing 40,000 affordable housing units in the Greater Cincinnati Region.
25. Strengthen with community faith based organizations and higher education institutions to accomplish the community wide goal of developing 40,000 affordable housing units in the Greater Cincinnati Region.

**CMHA Progress Report:**

□ In 2017 CMHA accomplished the following:

1. Completed year four of the Strategic Plan goals.
2. Updated the ACOP
3. CMHA achieved high performer status under SEMAP for the Housing Choice Voucher Program in 2017
4. Increased sight and sound unit mix over the last year.
5. Completed 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. Accomplished the state-wide goal Home For the Holidays program as it pertains to our veterans.
9. Averaged 77% of new hires being Section 3 residents.

**B.6 Resident Advisory Board (RAB) Comments.**

The Cincinnati Metropolitan Housing Authority requested that the Resident Advisory Board, as well as ALL members of the Resident Councils, engage in a program to gain their input for the FY2019-2020 Annual Plan. The members were invited to participate in a survey for the Capital items that they would like to see included in this year's 5 year annual plan. Included in the package was an opportunity for the member to include any handwritten comments for consideration in the Capital Statement, the Admissions and Continued Occupancy Policy (ACOP) and the CMHA Lease Agreement.

CMHA mailed 71 participation letters and received 20 responses. The results are as follows:

**CAPITAL SUBMISSIONS:**

As expected the survey for capital items showed the top 5 items as the following:

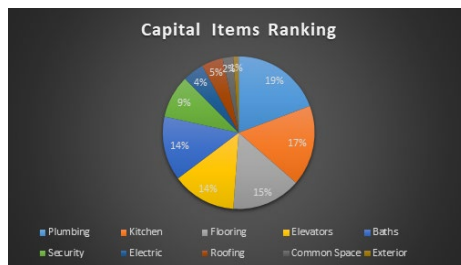
Plumbing (19%)

Kitchen (17%)

Flooring (15%)

Elevators (14%)

Baths (14%)



The residents also submitted written comments on the Capital Statement:

- Side doors on the building should be used as fire doors only. A resident should not be able to open it and let other guests enter through the side door.
- Would like a bathroom make over with new vent fans.
- New flooring throughout the apartments
- Cabinets need to be repaired and replaced
- Bathtubs surrounds need to be replaced
- Clean or replace plumbing stacks
- Repair all elevators
- Additional safer parking
- Would like to see a change to all vinyl flooring and no carpet in apartments
- Painting throughout apartment
- New appliances
- Replace counter tops
- Better bathroom lighting
- Additional security in the buildings (Security guards, cameras, etc..)

**Admissions and Continued Occupancy Policy (ACOP) and Lease Agreement:**

In the same packet we asked for submissions regarding the new ACOP and Lease Agreement.

- Resident would like more advanced notice if CMHA is going to enter their apartment, providing it is a non-emergency situation
- Any CMHA employee entering an apartment should have to leave a door hanger stating when they were in the apartment and identifying the employee that was doing the service
- Pet rules should be updated (no specific information was given)
- Want work orders completed within 24 hours
- Need security cameras on all floors and a building monitor

CMHA will send a response to J-RAB and all Resident Council members; thanking them for their participation and addressing each item they submitted.

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

**POSTED FOR PUBLIC COMMENTS ON 1/22/19**

**B.7 Certification by State or Local Officials.**

[Form HUD 50077-SL](#), *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

<b>B.8</b>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y    N    N/A  <input type="checkbox"/>   <input type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C.</b>	<p><b>Statement of Capital Improvements.</b> 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>
<b>C.1</b>	<p><b>Capital Improvements.</b> 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 September 4, 2018 CFP Five-Year Action Plan 2018-2022</p>