



Summary of Proposed Changes to the 2019-2020 Admissions and Occupancy Policy

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

Policy:

Section V - Transfer Policy

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 crimes¹ or extreme harassment; **or to witnesses of crimes,² or to victims of domestic violence, dating violence, stalking, or sexual assault³**, 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

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

² 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. The procedure for a VAWA emergency transfer is outlined in the Emergency Transfer VAWA Plan, which is an addendum to this ACOP.

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 Submissions

Within each category, transfer applications will be sorted by the date the completed file (including any verification needed) is received from the manager.

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.

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 disability.

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.

D. 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.

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

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.

A. 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 CMHA RESIDENTIAL DWELLING 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;