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| Annual PHA Plan <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.

| 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>07/2020</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>5,126</u> Number of Housing Choice Vouchers (HCVs) <u>11,663</u> Total Combined Units/Vouchers <u>16,789</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: | | | | | | | | | | | |
| 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: | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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) | | | |
| <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> 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 | 7443 | | 1107 |
| Extremely low income <=30% AMI | 7387 | 99.25% | |
| Very low income (>30% but <=50% AMI) | 49 | .06% | |
| Low income (>50% but <80% AMI) | 6 | Less than .1% | |
| Families with children | 3922 | 53% | |
| Elderly families | 132 | 1.8% | |
| Families with Disabilities | 1077 | 14.5% | |
| Race/ethnicity: White | 1033 | 13.8% | |
| Race/ethnicity: Black | 6348 | 85.3% | |
| Race/ethnicity: Native American | 42 | .56% | |
| Race/ethnicity: Asian | 8 | Less than .1% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 3190 | 42.86% | |
| 2 BR | 1768 | 23.75% | |
| 3 BR | 1127 | 15.14% | |
| 4 BR | 790 | 10.61% | |
| 5 BR | 341 | 4.6% | |
| 5+ BR | 227 | 3.04% | |

Is the waiting list closed (select one)? Yes

If yes:

How long has it been closed (# of months)? 3 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)

**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 | 13035 | | 829 |
| Extremely low income <=30% AMI | 11277 | 86.51% | |
| Very low income (>30% but <=50% AMI) | 1428 | 10.96% | |
| Low income (>50% but <80% AMI) | 307 | 2.36% | |
| Families with children | 4816 | 36.95% | |
| Elderly families | 392 | 3.01% | |
| Families with Disabilities | 1124 | 8.62% | |
| Race/ethnicity: White | 1843 | 14.14% | |
| Race/ethnicity: Black | 10943 | 83.95% | |
| Race/ethnicity: Native American | 23 | .18% | |
| Race/ethnicity: Asian | 26 | .20% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR (Includes 21-0 BR) | 8339 | 63.97% | 282 |
| 2 BR | 2947 | 22.61% | 260 |
| 3 BR | 1337 | 10.26% | 198 |
| 4 BR | 348 | 2.67% | 78 |
| 5 BR | 49 | .38% | 7 |
| 5+ BR | 14 | .11% | 4 |

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 2020-2021 Administrative Plan**1. Chapter 4 – Parts F & H Local Preferences**

Language added to increase number of allotted preferences for Strategies to End Homelessness from 750 to 950.

- Referral from Strategies to End Homelessness up to **950** referrals. ** 30 points

FINANCIAL RESOURCES:

| Financial Resources: Planned Sources and Uses | | |
|---|-------------------------|-------------------------------------|
| Sources | Planned \$ | Planned Uses |
| 1. Federal Grants (FY 2019 grants) | | |
| a) Public Housing Operating Fund | \$25,494,359.00 | |
| b) Public Housing Capital Fund | \$13,152,579.00 | |
| c) Annual Contributions for Section 8 Tenant-Based Assistance | \$80,588,995.00 | |
| d) Other Federal Grants (list below) | \$186,689.00 | |
| e) Family Self Sufficiency | \$348,178.00 | 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 | \$6,505,545.00 | Public Housing Capital Improvements |
| e) HOPE VI Revitalization | \$0 | |
| 3. Public Housing Dwelling Rental Income | | |
| a) Rental Income | \$8,407,504.00 | Public Housing Operations |
| 4. Other income (list below) | | |
| a) Excess Utilities | | Public Housing Operations |
| b) Non-dwelling Rental | \$189,099.00 | Other |
| c) Interest & Other Income | \$24,502.00 | Other |
| 5. Non-federal sources (list below) | | |
| | | |
| | | |
| | | |
| Total resources | \$134,897,450.00 | |

VAWA UPDATE:

During calendar year 2019, CMHA received **116** submissions for the transfers under the Violence Against Women Act (VAWA); **75** of the transfer requests were from the Asset Management program and **41** requests were from the Voucher Management program. 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.) CMHA continues to work with the YWCA and Women Helping Women to provide admission preferences points to individuals who are survivors of domestic violence.

OPERATION AND MANAGEMENT:

Summary of Proposed Changes to the 2020-2021 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-F– Local Preference and Unit Selection: Per HUD PIH 2019-26, the working family preference is removed as a tool for waiting list provision.

CMHA is removing language from the Admissions and Continued Occupancy that outlines the administration of a preference for working families. In addition, since the working family local preference was also available to a family if the head, spouse/co-head, or sole member was elderly or disabled; then those families will also not receive the working family preference. The reference to working families, disabled families or elderly receiving 3 points will be removed from the Section F (2) in regards to the Local Preference and Points Allocation schedule. In addition, definitions of the working family preference will be removed from Section II-F (3) and Section XVII of the Admissions and Continued Occupancy Policy.

Section II-B– Local Preference and Unit Selection: Per HOTMA regulations the eligibility for LIPH assisted housing is clarified by the following provision:

B. Qualification for Admission

1. It is CMHA's policy to only admit qualified applicants¹².

Assistance may not be provided for a family whose net assets exceed \$100,000 or who has an ownership interest and the legal right to reside in real property suitable for occupancy. Does not apply to victims of domestic violence, families offering the real property for sale, or persons receiving homeownership assistance or assistance for the rental of manufactured housing.

Section II-C – Wait List Management: Public housing developments that are converted to affordable housing will have their wait lists closed with present applicants being purged and placed on a new site-based wait list.

Under the HUD Rental Assistance Demonstration (RAD), CMHA is in the process of converting several public housing developments to affordable housing with project-based rental assistance. When this occurs at a development, the associated public housing wait list will be closed with all applicants being removed from the wait list and a new site-based wait list will be established for the development. Under Section II-C of the Admissions and Continued Occupancy Policy, line 5 is to be added:

5. Public housing developments that are converted to affordable housing will have their wait lists closed with present applicants being purged and placed on a new site-based wait list.

¹ -- Assistance may not be provided for a family whose net assets exceed \$100,000 or who has an ownership interest and the legal right to reside in real property suitable for occupancy--Does not apply to victims of domestic violence, families offering the real property for sale, or persons receiving homeownership assistance or assistance for the rental of manufactured housing.

--PHAs have the option not to enforce the limitation on eligibility based on assets for public housing residents

² The term "qualified" refers to applicants who meet the applicant selection standards. Eligibility is a term having specific meaning under the Housing Act of 1937. In order to be eligible, a family must meet four tests: (1) they must meet HA's definition of family; (2) have an Annual Income at or below program guidelines; (3) each family member; and (4) each family member receiving assistance must be a citizen or non-citizen with eligible immigration status.

Section II-F – Wait List Management: CMHA has clarified its preference listing. The clarifications will allow for preferences points given to Homeless Partners or Third-Party Certification in addition to the Homeless Coalition. Additionally, the Family Unification and Youth Aging out of Foster Care were provided with their separate preference category. The definition for the homeless preference was further expanded.

| | |
|---|-----------------|
| Referral from Local Homeless Partners or Third-Party Certification (Broadens the definition to allow for various Homelessness Partners in addition to the Homeless Coalition) | 4 Points |
| Family Unification (see below/to be defined) | 2 Points |
| Youths aging out of foster care who are between the ages of 18-24. | 2 Points |

3. Definitions of Preferences:

- (4) Temporarily/Transient Accommodations provided on a temporary basis to keep the individual family from the falling into to foregoing categories.
- (d) Family Reunification: the term "family reunification" as used this preference section is defined to describe a variety of programs that are intended to provide services to children and families who are experiencing serious problems that lead to the placement of children in foster care or otherwise result in the dissolution of the family unit, or families who are at risk of homelessness.

Section VI-B Over-Income Households: CMHA is replacing its procedure for handling over income households that was developed when the policy was discretionary and now adopting language that HUD has implemented for how to administer the policy relating to over income households.

CMHA is removing all current language from Section VI-B of the current Admissions and Continued Occupancy that outlines the continued eligibility of households with incomes above the HUD Low Income Limit. The following language will be adopted in the section pertaining to over income households:

The federal Housing Opportunity through Modernization Act (HOTMA) of 2016 places an income limitation on public housing tenancy for families. Once a family's income has exceeded 120% of the Area Median Income (AMI), or a different limitation set by the Secretary of HUD ("over-income limit") for two consecutive years, CMHA may terminate the family's tenancy within six (6) months of the second income determination or charge the family a monthly rent equal to the greater of:

- (1) The applicable Fair Market Rent (FMR) for the area; or
- (2) The amount of monthly subsidy for the unit including amounts from the operating and capital fund, as determined by regulations.

Section III - Tenant Selection and Assignment Plan: 3. Debts Owed to CMHA

CMHA is providing a method for applicant to redress their balances while allowing the applicants to continue through the application process.

- 2. CMHA will determine eligibility for the program. Applicants will retain their position on the site wait list selected until they reach the top of that list.

Section II- Eligibility and Admissions and Processing of Applications: A. Organization of Waiting List

CMHA further clarified the manner by which applicants are processed and offered CMHA residences.

Debts Owed To CMHA: If the applicant has a prior outstanding debt that is owed to CMHA, which would otherwise disqualify the applicant from housing, then CMHA may allow the applicant time to repay of this debt, while the application is processed by the Eligibility Department. The payment of the debt will be in accordance with the Bad Debt.

Summary of Proposed Changes to the 2020-21 Maintenance Charge Schedule

Maintenance Charge Schedule: A. Organization of Waiting List

CMHA has not increased charges under its *Maintenance Charge Schedule* for the past five years. The charges under the schedule will reflect a ten (10%) percent adjustment to reflect increases in costs and labor.

(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: J

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.

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.

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 not exceeding 25% of the CFP budget (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 has no planned Choice Neighborhood or Hope VI grants pending or proposed applications.

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.

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 50-120 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 of 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.

CMHA also intends to enter into a Master Development Agreement with a private development company for the transformation of the northern 40 acres of English Woods. The terms of the agreement may specify the construction of new single family homes, multi-family homes, and recreational amenities. The agreement will be presented to the Board of Commissioners for final approval once the terms have been specified.

Lincoln Heights – CMHA is considering development of up to 80 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. On a separate project, CMHA is considering a partnership with a private developer for the construction of new affordable multifamily housing units on Logan Street. CMHA is also submitting a 9% LIHTC Application for the construction of new affordable units in the nearby neighborhood of Pendleton.

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. CMHA will also look for partners to development affordable multi-family rental units in the West End.

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, Pendleton 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 when feasible. 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 (RAD)

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 preserve the Agency's affordable housing units and invest in replacement units. RAD Transfer of Assistance allows CMHA to transfer the housing assistance from existing assisted units that are not viable to new units to provide long-term affordability for those new units.

CMHA plans to submit Portfolio RAD Applications in a multi-phase approach. Currently, CMHA has submitted RAD Applications for AMPs 204, 205, 207, 208, 210, 211, 213, 214, 216 and 218. CMHA will also support the Community Builders' RAD Applications for the City West Amps 301-308.

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.

Additionally, CMHA has received Commitments to Enter into a Housing Assistance Payment Contract (CHAPs) for two scattered site projects referred to as Round 3 Bundle H and Round 3 Bundle J. The Round 3 Bundle J project contains 75 walk-up/multifamily apartment units located in the northeast part of Hamilton County. CMHA is currently requesting to amend the Round 3 Bundle H CHAP. The original Round 3 Bundle H CHAP contains 67 units in central Hamilton County including units in the Over-the-Rhine neighborhood of Cincinnati. The amended CHAP if approved by HUD will contain only the 28 walk-up/multifamily units in the Over-the-Rhine neighborhood of Cincinnati.

CMHA recently received CHAPs for 240 units in AMPS 201, 202, 203, 204, 205, and 206, the majority of which are scattered site properties located throughout Hamilton County. The CMHA Development Department is currently analyzing financial repositioning options for these properties.

As a result, CMHA will be converting a number of its Asset Management units to either Project Based Vouchers or Project Based Rental Assistance (PBRAs) under the guidelines of H-2019-09 PIH 2019-23, Notice PIH 2018-04 and any successor PIH Notices, rules and regulations. Upon conversion, CMHA will adopt resident rights, participating, waiting list and grievance procedures as required by HUD. CMHA will comply with all fair housing and civil rights requirements.

The RAD and Section 18 Blending programs were 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 Operation Reserves available at the time of conversion and Capital Funds in the amount of \$10,500,000 towards the conversion.

CFFP Debt

CMHA currently has debt under the Capital Fund Financing Program with a principal balance of \$9,474,769 at 6/30/2019. CMHA makes a monthly payment on this debt on an amortization schedule with a final payoff date of September 1, 2026. In addition to the monthly payments, CMHA must also have to pay a share of this debt related to removal of units from public housing. CMHA's request to remove 1,181 units without prepayment of CFFP debt was approved on March 2, 2017. Since receiving this approval CMHA has removed a total of 206 units from public housing and therefore can remove approximately 975 more public housing units without prepayment of CFFP debt. CMHA will continue working with its lender to address outstanding debt issues.

Development #1

| | | | |
|-------------------------------------|--|---|---|
| Name of Public Housing Development: | Pic Development ID: | Conversion Type (i.e., PBV or PBRA): | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): |
| <u>Marianna Terrace</u> | <u>OH004-000204</u> | <u>PBRA/Section 18 PBV</u> | <u>N/A</u> |
| Total Units: | Pre: RAD Unit Type (i.e., Family, Senior, etc.): | Post-RAD Unit type if different (i.e., Family, Senior, etc.): | Capital Fund Allocation of Development: |
| <u>76</u> | <u>Family</u> | <u>Family</u> | <u>\$191,616.52</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |

| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
|---|--|------------------------------------|--|
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 14 | 14 | |
| Two Bedroom | 27 | 27 | |
| Three Bedroom | 27 | 27 | |
| Four Bedroom | 4 | 4 | |
| Five Bedroom | 4 | 4 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #2

| | | | |
|---|---|---|--|
| Name of Public Housing Development: <u>Scattered Sites</u> | Pic Development ID: <u>OH004-000205</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>24</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$60,510.48</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 4 | 4 | |
| Two Bedroom | 12 | 12 | |
| Three Bedroom | 8 | 8 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #3

| | | | |
|---|---|---|--|
| Name of Public Housing Development: <u>Findlater Gardens</u> | Pic Development ID: <u>OH004-000210</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| <u>653</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$1,646,389.31</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 98 | 98 | |
| Two Bedroom | 210 | 210 | |
| Three Bedroom | 214 | 214 | |
| Four Bedroom | 111 | 111 | |
| Five Bedroom | 17 | 17 | |
| Six Bedroom | 3 | 3 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #4

| | | | |
|---|--|---|--|
| Name of Public Housing Development: <u>Evanston</u> | Pic Development ID: <u>OH004-000211</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>100</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$252,127</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 100 | 100 | |
| Two Bedroom | 0 | 0 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #5

| | | | |
|--|--|---|---|
| Name of Public Housing Development: <u>Park Eden</u> | Pic Development ID: <u>OH004-000213</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>176</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$443,743.52</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 6 | 6 | |
| One Bedroom | 169 | 169 | |
| Two Bedroom | 1 | 1 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #6

| | | | |
|---|--|---|---|
| Name of Public Housing Development: <u>Stanley Rowe and Liberty St. Apts.</u> | Pic Development ID: <u>OH004-000214</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>554</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$1,396,783.58</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |

| | | | |
|--|--|-----|--|
| Studio/Efficiency | 26 | 26 | |
| One Bedroom | 161 | 161 | |
| Two Bedroom | 255 | 255 | |
| Three Bedroom | 101 | 101 | |
| Four Bedroom | 9 | 9 | |
| Five Bedroom | 2 | 2 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #7

| | | | |
|--|--|---|---|
| Name of Public Housing Development: <u>Pinecrest</u> | Pic Development ID: <u>OH004-000216</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>190</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$479,041.30</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 178 | 178 | |
| Two Bedroom | 12 | 12 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #8

| | | | |
|--|--|---|---|
| Name of Public Housing Development: <u>Maple Tower</u> | Pic Development ID: <u>OH004-000211</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>120</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$302,552.40</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 114 | 114 | |
| Two Bedroom | 6 | 6 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #9

| | | | |
|--|---|---|--|
| Name of Public Housing Development: <u>Beechwood</u> | Pic Development ID: <u>OH004-000211</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
|--|---|---|--|

| | | | |
|---|--|--|--|
| Total Units: 149 | Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family | Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family | Capital Fund Allocation of Development: \$375,669.23 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 16 | 16 | |
| One Bedroom | 132 | 132 | |
| Two Bedroom | 1 | 1 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #10

| | | | |
|---|--|--|---|
| Name of Public Housing Development: Winton Terrace | Pic Development ID: OH004-000209 | Conversion Type (i.e., PBV or PBRA): PBRA/Section 18 PBV | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A |
| Total Units: 608 | Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family | Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family | Capital Fund Allocation of Development: \$1,532,932.16 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 86 | 86 | |
| Two Bedroom | 274 | 274 | |
| Three Bedroom | 147 | 147 | |
| Four Bedroom | 99 | 99 | |
| Five Bedroom | 2 | 2 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #11

| | | | |
|---|--|--|---|
| Name of Public Housing Development: Millvale | Pic Development ID: OH004-000217 | Conversion Type (i.e., PBV or PBRA): PBRA/Section 18 PBV | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A |
| Total Units: 468 | Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family | Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family | Capital Fund Allocation of Development: \$1,179,954.36 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 32 | 32 | |
| Two Bedroom | 208 | 208 | |
| Three Bedroom | 179 | 179 | |
| Four Bedroom | 43 | 43 | |

| | | | |
|--|--|---|--|
| Five Bedroom | 1 | 1 | |
| Six Bedroom | 5 | 5 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #12

| | | | |
|--|--|---|--|
| Name of Public Housing Development: <u>San Marco</u> | Pic Development ID: <u>OH004-000212</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>30</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$75,638.10</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 30 | 30 | |
| Two Bedroom | 0 | 0 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #13

| | | | |
|--|--|---|---|
| Name of Public Housing Development: <u>Riverview</u> | Pic Development ID: <u>OH004-000212</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>110</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$277,339.70</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 28 | 28 | |
| One Bedroom | 81 | 81 | |
| Two Bedroom | 1 | 1 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #14

| | | | |
|--|--|---|---|
| Name of Public Housing Development: <u>The Redding</u> | Pic Development ID: <u>OH004-000213</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>100</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$252,127.00</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |

| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
|---|--|------------------------------------|--|
| Studio/Efficiency | 7 | 7 | |
| One Bedroom | 90 | 90 | |
| Two Bedroom | 3 | 3 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #15

| | | | |
|---|---|---|---|
| Name of Public Housing Development: <u>Marquette Manor</u> | Pic Development ID: <u>OH004-000218</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>140</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$352,977.80</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 140 | 140 | |
| Two Bedroom | 0 | 0 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #16

| | | | |
|---|---|---|---|
| Name of Public Housing Development: <u>The President</u> | Pic Development ID: <u>OH004-000213</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>96</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$242,041.92</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 23 | 23 | |
| One Bedroom | 72 | 72 | |
| Two Bedroom | 1 | 1 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #17

| | | | |
|---|--|---|--|
| Name of Public Housing Development: <u>Scattered Sites – Bundle H</u> | Pic Development ID: <u>OH004-000201</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>28</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$70,595.56</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 6 | 6 | |
| Two Bedroom | 10 | 10 | |
| Three Bedroom | 12 | 12 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #18

| | | | |
|---|--|---|---|
| Name of Public Housing Development: <u>Scattered Sites – Bundle J</u> | Pic Development ID: <u>OH004-000203</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>75</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$189,095.25</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 2 | 2 | |
| One Bedroom | 36 | 36 | |
| Two Bedroom | 36 | 36 | |
| Three Bedroom | 1 | 1 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #19

| | | | |
|---|--|---|---|
| Name of Public Housing Development: <u>Acquisition Rehab MP1 (Project 12)</u> | Pic Development ID: <u>OH004000205</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>24</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$39,842</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |

| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
|---|--|------------------------------------|--|
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 4 | 4 | |
| Two Bedroom | 12 | 12 | |
| Three Bedroom | 8 | 8 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #20

| | | | |
|---|--|---|---|
| Name of Public Housing Development: <u>Scattered Site Central – Bundle K</u> | Pic Development ID: <u>OH004000201</u> <u>OH004000203</u> <u>OH004000204</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>60</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: \$99,605 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 24 | 24 | |
| Two Bedroom | 30 | 30 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #21

| | | | |
|--|---|---|--|
| Name of Public Housing Development: <u>Scattered Site Fair Southeast - Bundle I</u> | Pic Development ID: <u>OH004000202</u> <u>OH004000203</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>76</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$126,166</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 52 | 52 | |
| Two Bedroom | 24 | 24 | |
| Three Bedroom | 0 | 0 | |
| Four Bedroom | 0 | 0 | |
| Five Bedroom | 0 | 0 | |
| Six Bedroom | 0 | 0 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Development #22

| | | | |
|--|---|---|--|
| Name of Public Housing Development: <u>Scattered Site Southwest – Bundle M</u> | Pic Development ID: <u>OH004000205</u> <u>OH004000206</u> | Conversion Type (i.e., PBV or PBRA): <u>PBRA/Section 18 PBV</u> | Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <u>N/A</u> |
| Total Units: <u>80</u> | Pre: RAD Unit Type (i.e., Family, Senior, etc.): <u>Family</u> | Post-RAD Unit type if different (i.e., Family, Senior, etc.): <u>Family</u> | Capital Fund Allocation of Development: <u>\$132,807</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) |
| Bedroom Type | Number of Units Pre-Conversion | Number of Units Post-Conversion | Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.) |
| Studio/Efficiency | 0 | 0 | |
| One Bedroom | 1 | 1 | |
| Two Bedroom | 43 | 43 | |
| Three Bedroom | 20 | 20 | |
| Four Bedroom | 10 | 10 | |
| Five Bedroom | 4 | 4 | |
| Six Bedroom | 2 | 2 | |
| (if performing a Transfer of Assistance) | (Explain how transferring waiting list) <u>N/A</u> | | |

Resident Rights, Participation, Waiting List and Grievance Procedures Under RAD (Attachment)

2. **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.
3. **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.
4. **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.
5. **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.
6. **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 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 AMP 210, 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.

11. Definition of Substantial Deviation/Modification

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

12. Definition of Substantial Deviation/Modification

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

13. 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 not exceeding 25% of the CFP budget (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.

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
- 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 |
| 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 | Demolition | Submitted | 6/19 | 37 Units | 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 | |

CMHA plans to submit a Section 18 Disposition Application for approximately 460 non-contiguous buildings with four or fewer total unit scattered sites (629 total units) under the guidelines of PIH Notice 2018-04 (HA) and any other applicable PIH Notices, rules and regulations. CMHA plans to transfer these units to a related entity and commit voucher resources received as a result of the disposition or otherwise to project-based vouchers for the units, thus creating a more stable funding source for these units. Approximately three of these units may need to be demolished and reconstructed. A 30-year use agreement will be tied to each unit restricting use of these properties to affordable housing. CMHA may request HUD permission to sell at fair market value a small portion of these units that are either in a deteriorated physical condition that will preclude their preservation as affordable housing or are remotely located making management and maintenance of these units financially infeasible. CMHA would seek additional tenant-based vouchers from HUD to replace those units. CMHA expects to phase in these unit dispositions over several years and will refine the timelines stated below.

Non-Contiguous 1-4 Unit Scattered Sites/Section 18 - Disposition Activity Description Table

| | 1 | 2 | 3 | 4 | 5 |
|-----|-----------------|-------|---------|-------------------------------|--|
| AMP | Number of Units | Type | Status | Timeline (actual disposition) | Narrative |
| 201 | 111 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |
| 202 | 39 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |
| 203 | 45 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |
| 204 | 115 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |
| 205 | 82 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |
| 206 | 74 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |
| 207 | 138 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |
| 208 | 25 | Dispo | Planned | 2021-2023 | CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above, |

DESIGNATED HOUSING FOR ELDERLY AND/OR DISABLED FAMILIES

Asset Management

During the 2020-2021 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 | 24 | Pending Submission | |
| AMP 202 | Various Addresses | Scattered Sites | 6 | Pending Submission | |
| AMP 203 | Various Addresses | Scattered Sites | 8 | Pending Submission | |
| AMP 204 | Various Addresses | Scattered Sites | 22 | Pending Submission | |
| AMP 205 | OH004-27 | Quebec Gardens | 40 | Pending Submission | |
| AMP 205 | Various Addresses | Scattered Sites | 18 | Pending Submission | |
| AMP 206 | Various Addresses | Scattered Sites | 5 | Pending Submission | |
| AMP 207 | Various Addresses | Scattered Sites | 12 | 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 213 | OH004-213 | Park Eden | 50 | Pending Submission | |
| AMP 216 | OH004-216 | Pinecrest | 14 | Pending Submission | |
| AMP 217 | OH004-06 | Millvale | 14 | Pending Submission | |

B.3 Civil Rights Certification.

Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

Please consider this my authorization to date my signature on these docs, today, April 9th, 2020.

Bill

William Myles

MYLES & MYLES
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(513) 451-5994 direct fax
williammyles@fuse.net

**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 FY2020- FY2024 - 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

4/9/2020

Previous version is obsolete

Page 1 of 1

form HUD-50077-CR (2/2013)

RESOLUTION NO. 5385
RESOLUTION TO ADOPT CERTIFICATIONS OF COMPLIANCE –
HUD 50077 FOR THE CINCINNATI METROPOLITAN HOUSING
AUTHORITY'S ANNUAL PLAN FOR FISCAL YEAR 2021 AND THE 5-YEAR
PLAN FOR 2020-2024 – BOTH EFFECTIVE JULY 1, 2020

**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 X 5-Year and/or Annual PHA Plan for the PHA fiscal year beginning 07/01/20, 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 PHH 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
PHA Name

OH004
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2021

☒ 5-Year PHA Plan for Fiscal Years 2020 - 2024

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 <u>4/9/2020</u> |

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| <p>B.4</p> | <p>Most Recent Fiscal Year Audit.</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.5</p> | <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>CMHA Goals and Objectives:</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. Transform owned/operated portfolio through financial feasible funding models 7. Continue to use HUD tools to preserve affordable housing in Hamilton County 8. Use the Housing Strategy plan to help improve communities. <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. Continue to train staff on different funding models that deal with the transformation of our owned/operated portfolio. 3. Partner with Community Based Organizations and state agencies to collaborate on financial goals for our families. 4. Continue to update policies and SOP's. 5. Improve internal and external communications. 6. Continue to increase family income in the HCV Family Self-sufficiency Program. 7. Continue to recruit new property owners for the HCV Program. 8. Assess, renovate or modernize asset management units: 9. 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. 10. Implement green and sustainable housing initiatives such as; net/near zero, enterprise green and LEED. 11. Continue to further fair housing throughout Hamilton County. 12. Implement the new software YARDI for all programs. 13. Continue to work towards improving resident's self-sufficiency through the Resident Opportunity Center (ROC) 14. Continue to implement MTW like programs to improve resident's self-sufficiency, agency efficiency, and to improve program delivery to all customers. 15. Review and update all lease agreements 16. Continue affordable housing developments. 17. Work toward strengthening relationships with the City of Cincinnati. 18. Work toward strengthening relationships with Hamilton County. 19. Strengthen partnerships with community groups 20. 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. 21. Continue to strengthen partnerships to preserve current housing and develop additional affordable housing throughout the community. 22. Complete a new agency Strategic Plan to use as a road map for the agency. 23. Complete a portfolio of Receivership for affordable housing 24. Increase our Section 3 goals through the preservation of our housing stock 25. Increase resident owned business participation through our transformation plans 26. Increase MBE, WBE and Section 3 business participation 27. Development of a plan/process to float around for the development and preservation of affordable housing, development of new affordable housing and the new preservation or development of the central office location. <p>CMHA Progress Report:</p> <p>In 2019 CMHA accomplished the following:</p> <ol style="list-style-type: none"> 1. Completed year five of the Strategic Plan goals. 2. Updated the ACOP 3. CMHA achieved high performer status under SEMAP for the Housing Choice Voucher Program in 2018 |

| | |
|------------|---|
| | <p>4. Increased sight and sound unit mix over the last year.</p> <p>5. Created the Resident Opportunity Center (ROC) at Winton Terrace and Findlater Gardens</p> <p>6. Created a Strategic Economic Impact Plan</p> <p>7. Received over \$500,000 for new additional vouchers</p> <p>8. Completed selection of developers to assist with transformation goals.</p> <p>9. Closed on two transformation projects to move CMHA towards our transformation/preservation goals for the agency.</p> <p>10. Received several NAHRO awards for West Union Square.</p> <p>11. Completed the implementation of YARDI transformation for Touchstone managed properties, Finance and Procurement.</p> |
| B.6 | <p>Resident Advisory Board (RAB) Comments.</p> <p>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 FY2020-2021 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. 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.</p> <p><u>CMHA mailed 70 participation letters and received 11 responses. The results are as follows:</u></p> <p><u>CAPITAL SUBMISSIONS:</u></p> <ul style="list-style-type: none"> - Resident would like to see us convert all properties to Green Energy - No cost for air conditioner in one bedroom units - Replace all bathroom plumbing and sinks - Raise bathroom showerheads – too low - Bathroom sinks are set too low - Make stairways easily cleanable - Re-surface all parking lots - Heaters fixed in the community rooms and hallways - Replace hallway doors - Replace all screen doors - New tile flooring - Replace appliances - New windows - Exterior building maintenance - Cameras on all elevators - Better security on exterior doors <p><u>ACOP – Lease Agreement Rules:</u></p> <ul style="list-style-type: none"> - Possible include small dogs for all residents - Increase to two cars per resident - Residents that are mobile occupy upper floors - Better enforcement on pet policy - Increase accountability on residents - Quarterly meetings with Councils to review the lease - Notice of termination should include: reason for violation / month in question - More staff for the management office - Same rule enforcement for all residents - Lease rules should be submitted to the courts so all on the same page <p><u>ACOP – Admissions/Wait List:</u></p> <ul style="list-style-type: none"> - Cut down wait list time - Residents displaced by RAD should be given priority - Leave empty units for internal moves during RAD - More transparency - More inspections for bed bugs with new tenants moving in <p><u>ACOP – Other Recommendations:</u></p> <ul style="list-style-type: none"> - More Recycling bins - Would like programs that serve lunch and activities in the Rec Room - Bench in the smoker's area - Security cameras in the parking area and pool room area - More senior designated housing - Improve the work order repair process - Do not let strangers in the building - Limit loitering in the building - Designated parking spaces |

**ANNUAL PLAN COMMENTS FOR FY2020
SUMMARY OF COMMENT TO PLAN
AND CMHA RESPONSE**

CMHA provides the following written comments regarding the Annual Plan, the proposed changes to the Plan and the related documents. 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.

**CMHA VOUCHER MANAGEMENT ADMINISTRATIVE PLAN
Project Based Vouchers**

• **Charles Coston Comment:**

How does a vendor secure a PBV voucher if CMHA does not have a RFP? Is there any other way to apply.

RESPONSE

CMHA awards Project Based Vouchers based on a response to a published Request for Proposals. Responses submitted for a RFP are scored by a committee within the agency and awards are made accordingly. PBVs may also be awarded in accordance with PIH Notice 2017-21 (HA) issued October 30, 2017 which allows CMHA to attach PBVs to a public housing project in which it has an ownership interest or over which it has control and is engaged in an initiative to improve, develop, or replace public housing properties or sites.

DEBT REPAYMENT

• **St. Lydia's House Comments:**

Comment No. 1: Create a transparent way for clients to search how much they owe in both debt directly to CMHA and in debt reported on the EIV, why it was accrued and how to pay it back, such that a client can access this information with one phone call and a social security number or with a simple form and one email sent.

RESPONSE

The Enterprise Income Verification (EIV) System was created and is operated by the United States Department of Housing and Urban Development (HUD). Access to EIV is restricted for use by PHA staff or PHA-hired management agents as outlined in PIH Notice 2018-18. CMHA has no authority to grant access to clients or the general public.

CMHA is in agreement that applicants should have access to information regarding debts they may owe CMHA. There are existing processes which allow clients to access this information during normal business hour by contacting CMHA's Finance Department which can provide account balances.

Former housing program participants or tenants may contact CMHA's Finance Department to obtain copies of their ledgers which detail all charges and payments made to the account. This will provide individuals with a clear understanding of how and why the balance was accrued.

Additionally, CMHA is exploring potential future software enhancements to provide former participants and tenants with direct online access to their accounts.

Comment No. 2: Notify ineligible applicants with a detailed explanation of why they are ineligible and how to remediate debt or other excluding factors (if remediation is possible). For example, if a client is ineligible due to owing debt for damaging a unit, provide them with a written explanation of damages, when the damages occurred and how much is owed. Provide a remediation plan, like "in order to be re-eligible for housing you must pay \$500 plus wait two years from the time of damage." Include in any letter of rejection a clear path back to housing if that path is available or state clearly "you will not ever be eligible for CMHA housing in the future."

RESPONSE

CMHA is in agreement that applicants should have access to information regarding the debts that they may owe CMHA. The housing authority has a current processes which allow applicants to access this information during normal business hour by contacting CMHA's Finance Department which can provide account balances.

If damages are related to findings from the move-out inspection that occurred when a tenant vacated their unit, notification of damages are identified on a security deposit disposition which is mailed after the former tenant vacated the unit. If an applicant has not maintained a copy of the security deposit disposition from their previous tenancy, then another copy can be provided to explain charges for damages that were assessed. Regardless of the source of the debt, the ledger provided by the Finance Department will have the most up-to-date information regarding charges owed for a current applicant.

It is agreed that a denied housing application should identify reasons for the denial. This is currently a part of our process. CMHA will include as much detail as administratively possible including information about how to appeal the decision through our administrative hearing process.

Determination of eligibility is a point in time review. Any future application would involve reassessment of the applicant considering their suitability as a tenant at that future time. Due to ongoing changes in federal regulations and housing policies and a potential applicant's changing personal situation, the most definitive statement of the reasons for rejection will be based on current policy and current applicant situation. The most up-to-date CMHA Housing Choice Voucher Administrative Plan and the Asset Management Admissions and Continued Occupancy Policy can be referenced to provide guidance on criteria that impacts eligibility determinations.

Comment No. 3: Create a debt verification process, whereby a client can request a meeting or hearing to review debt, verify debt with evidence provided by the housing provider, and sign off on their debt payment plan before the payment or payments are made.

RESPONSE

Applicants should review debts owed on their account. Upon receiving information about their debt, an applicant may contact CMHA for an informal meeting to discuss any charges or rent calculations. Most concerns can be resolved in this manner. Should the applicant continue to dispute the charges, an administrative hearing can be requested. An independent hearing officer will meet with both parties to review the case and provide a final decision on the debt in accordance with all local and Federal laws and regulations.

Comment No. 4: Allow for a special class of emergency clients to have expedited remediation if they are legal guardians of children and are receiving community based case management. For example, if a mother with a child applies, CMHA could offer a full debt forgiveness after 4 years (as opposed to the typical 8 years) or a debt reduction of 50% on any amount of debt[1], assuming her case manager agrees to leverage community resources to pay back debt.

RESPONSE

CMHA has various local preferences that provide the ability for members of at-risk groups to have their housing opportunity expedited through partnerships with various local service providers and agencies. Currently, HUD does not authorize any PHA-sponsored amnesty or debt forgiveness programs. In accordance with PIH Notice 2018-18, CMHA does not have authority to forgive debt for applicants.

Review of HUD Guidance: Notice PIH 2018-18; *Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System* was issued on October 26, 2018 and remains in effect until amended, superseded or rescinded.

16. Tenant Repayment Agreement. If the tenant refuses to enter into a repayment agreement or fails to make payments on an existing or new repayment agreement, the PHA must terminate the family's tenancy or assistance, or both. **HUD does not authorize any PHA-sponsored amnesty or debt forgiveness programs.**

19. Debts owed to PHAs and termination information: Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the PIH program.

Comment No. 5: Allow all clients to renegotiate debt of over \$1000 for a 50% reduction if debt is paid within two years of accrual and paid in full; allow clients the option of a 24-month payment plan if they cannot pay in full at one time, and create a forgiveness option to forgive remaining debt for those that pay payments consistently and on time for 12 months.

RESPONSE

As referenced above, CMHA does not have the authority to reduce or forgive debt per HUD PIH Notice 2018-18. Partial payments are accepted for housing applicants currently. Applicants have the flexibility to pay off debt as they are financially able. There is no minimum payment currently.

Additionally, CMHA has proposed changes to the Admissions and Continued Occupancy Policy that would allow the processing of applications for clients who meet all non-financial criteria for housing eligibility. However, full payment of past bad debt must be made prior to receiving a housing offer. This will provide additional time for Asset Management applicants to repay debts owed and not impede their programs on the wait list.

CMHA RESIDENTIAL LEASE AGREEMENT Activities Related to Establishment of Tenant Organizations

CMHA received several comments from Mr. Willis Nibert, of the Pinecrest Resident Council concerning the Residential Lease Agreement and the resident's right to organize a resident council.

Willis Nibert:

I was reading the 2020 CMHA Lease Agreement. I saw an issue with one that violations HUD Regulation. This can be found under V. TENANT'S OBLIGATIONS items 37. Signs and postings in the CMHA common spaces are subject to prior approval. Are violation HUD Regulation - 24 CFR 245.115. Here is a copy of HUD Notice H 2016-5 and I highlight this section for you.

HUD Regulation - 24 CFR 245.115 (the regulation was excerpted.)

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| | <p>You emphasized the component of the regulation which stated, “a) Owners of multifamily housing projects covered under §245.10, and their agents, must allow tenants and tenant organizers to conduct the following activities related to the establishment or operation of a tenant organization:</p> <ul style="list-style-type: none"> (1) Distributing leaflets in lobby areas; (2) Placing leaflets at or under tenants’ doors; (3) Distributing leaflets in common areas; (4) Initiating contact with tenants; (5) Conducting door-to-door surveys of tenants to ascertain interest in establishing a tenant organization and to offer information about tenant organizations; (6) Posting information on bulletin boards; (7) Assisting tenants to participate in tenant organization activities (8) Convening regularly scheduled tenant organization meetings in a space on site and accessible to tenants, in a manner that is fully independent of management representatives. In order to preserve the independence of tenant organizations, management representatives may not attend such meetings unless invited by the tenant organization to specific meetings to discuss a specific issue or issues; and (9) Formulating responses to owner’s requests for: <ul style="list-style-type: none"> (i) Rent increases; (ii) Partial payment of claims; (iii) The conversion from project-based paid utilities to tenant-paid utilities; (iv) A reduction in tenant utility allowances; (v) Converting residential units to non-residential use, cooperative housing, or condominiums; (vi) Major capital additions; and <p style="text-align: center;">RESPONSE</p> <p>In reviewing the regulation with the Lease Agreement, CMHA does not find anything that impedes the resident council’s ability to communicate or organize residents. The resident council is provided with a bulletin board to post information concerning its activities. This posting is done solely by the resident council and does not require the prior approval of the management. In its initial response acknowledging your public comment, CMHA requested that you provide information about instances where the resident council has not been allowed to distribute leaflets or post items in the manner outlined by §245.10 .” See February 7, 2020 - <i>Email Acknowledging Public Comment</i>. You have not submitted a follow up response to this inquiry.</p> <p>Conclusion: CMHA does not construe the lease requirement to have items approved prior to posting on the public bulletin board as violating the allow tenants and tenant organizers to conduct the activities related to the establishment or operation of a tenant organization. The tenants are provided with a separate bulletin board, which is solely within their control. CMHA will review the provisions of §245.10 to ensure that it staff does not take any action inconsistent with the requirements of this regulation. Thank you for your comment and continued interest in CMHA.</p> <div style="border: 1px solid black; text-align: center; padding: 5px; margin: 10px 0;">SUMMARY</div> <p>Thank you for your response and review of the Annual Plan and interest in CMHA. CMHA considers that we have a shared vision for expanding the affordable housing footprint in Hamilton County through our voucher and asset management programs.</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, 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 (CMHA)
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.

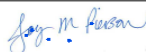
The Cincinnati Metropolitan Housing Authority's Annual Plan for Fiscal Year 2020-2021 and the 5 Year
PHA Plan for Fiscal Years 2020-2025 are consistent with the Hamilton County 2020-2024 Consolidated
Plan and the 2020 Action Plan , pursuant to 24 CFR Part 91.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. 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

Joy Pierson

Signature



Title

COMMUNITY DEVELOPMENT
ADMINISTRATOR

Date

4/8/2020

**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 (CMHA)
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 plan for Fiscal year 2020-2021 and the 5-year
PHA plan for Fiscal years 2020-2025 is consistent with the City of Cincinnati's
2020 - 2024 Consolidated Plan and the 2020 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 accompanying narrative, 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, 3030, 1002; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Aisha Tzillah

Signature

Title

COMMUNITY DEVELOPMENT
ADMINISTRATOR

Date

April 1, 2020

| | |
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| 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 May 12, 2019 CFP Five-Year Action Plan 2019-2023</p> |