

5-Year PHA Plan (for All PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 02/29/2016

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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A. PHA Information.																																	
A.1	<p>PHA Name: Cincinnati Metropolitan Housing Authority PHA Code: OH004</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2020</p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. 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 websites. 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><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></tbody></table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	5-Year Plan. Required for <u>all</u> PHAs completing this form.
B.1	<p>Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.</p> <p>The CMHA Mission To be a leader in the housing industry by providing exceptional housing opportunities while achieving high levels of customer satisfaction, promoting self-sufficiency and neighborhood stability, and being a long-term asset to the community. We will achieve this by developing public/private partnerships, creating entrepreneurial opportunities and by employees and residents holding themselves to our Gold Standards of Excellence.</p>
B.2	<p>Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</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>B.3</p>	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <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 4. Increased sight and sound unit mix over the last year. 5. Created the Resident Opportunity Center (ROC) at Winton Terrace and Findlater Gardens 6. Created a Strategic Economic Impact Plan 7. Received over \$500,000 for new additional vouchers 8. Completed selection of developers to assist with transformation goals. 9. Closed on two transformation projects to move CMHA towards our transformation/preservation goals for the agency. 10. Received several NAHRO awards for West Union Square. 11. Completed the implementation of YARDI transformation for Touchstone managed properties, Finance and Procurement.
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B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

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.

Notice of Occupancy Rights under the Violence Against Women Act²⁴

To all Tenants and Applicants:

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.²⁵ The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that Cincinnati Metropolitan Housing Authority (CMHA) is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA."

Protections for Applicants

If you otherwise qualify for assistance under CMHA you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking

Protections for Tenants

If you are receiving assistance under CMHA you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under CMHA solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

Removing the Abuser or Perpetrator from the Household

CMHA may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If CMHA chooses to remove the abuser or perpetrator, CMHA may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, CMHA must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, CMHA must follow Federal, State, and local eviction procedures. In order to divide a lease, CMHA may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, CMHA may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, CMHA may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.

(2) You expressly request the emergency transfer. Your housing provider may choose to require that you submit a form, or may accept another written or oral request.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent

harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

CMHA will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

CMHA's emergency transfer plan provides further information on emergency transfers, and CMHA must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

CMHA can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from CMHA must be in writing, and CMHA must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. CMHA may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to CMHA as documentation. It is your choice which of the following to submit if CMHA asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

☐ A complete HUD-approved certification form given to you by CMHA with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.

☐ A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.

☐ A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.

☐ Any other statement or evidence that CMHA has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, CMHA does not have to provide you with the protections contained in this notice.

If CMHA receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), CMHA has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, CMHA does not have to provide you with the protections contained in this notice.

Confidentiality

CMHA must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

CMHA must not allow any individual administering assistance or other services on behalf of CMHA (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

CMHA must not enter your information into any shared database or disclose your information to any other entity or individual. CMHA, however, may disclose the information provided if:

☐ You give written permission to CMHA to release the information on a time limited basis.

☐ CMHA needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.

☐ A law requires CMHA or your landlord to release the information

VAWA does not limit CMHA's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, CMHA cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if CMHA can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

- 1) Would occur within an immediate time frame, and
- 2) Could result in death or serious bodily harm to other tenants or those who work on the property.

If CMHA can demonstrate the above, CMHA should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance if needed, by contacting or filing a complaint your local housing authority of HUD Field Office.

For Additional Information

You may view a copy of HUD's final VAWA rule at <https://www.hud.gov/states>. Additionally, CMHA must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact Gina Stewart, CMHA, at 513-977-5681, gina.stewart@cintimha.com

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact **Women Helping Women** at 513-381-5610. Persons with hearing impairment can be accessed by calling 513-977-5545 (TTY). **YWCA** at 513-872-9259 or **Toll-Free: 888-872-9259 (TTY accessible)**

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Victims of stalking seeking help may contact Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://www.rainn.org/>

**CERTIFICATION OF
DOMESTIC VIOLENCE,
DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING,
AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: The Violence Against Women Act ("VAWA") protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, "professional") from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of "domestic violence," "dating violence," "sexual assault," or "stalking" in HUD's regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

Form HUD-5382
(12/2016)

**TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE,
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

1. Date the written request is received by victim: _____
2. Name of victim: _____
3. Your name (if different from victim's): _____
4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____
6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____
8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

Form HUD-5382
(12/2016)

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

Cincinnati Metropolitan Housing Authority (CMHA) is concerned about the safety of its residents, and such concern extends to residents who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the *Violence Against Women Act* (VAWA), 1 CMHA allows residents who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the resident's current unit to another unit. Such transfer will be processed as a Category 1 Administrative Transfer in accordance with CMHA's Admissions and Occupancy Plan ("ACOP")

The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of CMHA to honor such request for residents currently receiving assistance, however, may depend upon a preliminary determination that the resident is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether CMHA has another dwelling unit that is available and is safe to offer the resident for temporary or more permanent occupancy.

This plan identifies residents who are:

1. eligible for an emergency transfer,
2. the documentation needed to request an emergency transfer,
3. confidentiality protections,
4. how an emergency transfer may occur, and
5. guidance to residents on safety and security.

CMHA's plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Cincinnati Metropolitan Housing Authority is in compliance with VAWA.

Eligibility for Emergency Transfers

A resident who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the resident reasonably believes that there is a threat of imminent harm from further violence if the resident remains within the same unit. If the resident is a victim of sexual assault, the resident may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

- ☐ A resident requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.
- ☐ Residents who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

NOTE: According to HUD's regulation 24 CFR part 5, subpart L a victim of the following:

Domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

The length of the relationship

The type of relationship

The frequency of interaction between the persons involved in the relationship

Sexual assault means any nonconsensual sexual act proscribed by federal, tribal, or state law, including when the victim lacks the capacity to consent.

Stalking means to engage in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others, or suffer substantial emotional distress.

Emergency Transfer Request Documentation

To request an emergency transfer, the resident shall notify CMHA's asset management office and complete a "VAWA Transfer Request" form. The completed form will be received by the property management office and/or Relocation/Social Worker at 1088 W. Liberty Street, Cincinnati, Ohio 45214. CMHA will provide reasonable accommodations to this policy for individuals with disabilities. The resident's written request for an emergency transfer should include either:

1. A statement expressing that the resident reasonably believes that there is a threat of imminent harm from further violence if the resident were to remain in the same dwelling unit assisted under CMHA's program; OR
2. A statement that the resident was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the residents request for an emergency transfer; AND
3. Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and alternate documentation form must be completed. (Refer to Form HUD-5382)

Confidentiality

CMHA will keep confidential any information that the resident submits in requesting an emergency transfer, and information about the emergency transfer, unless the resident gives CMHA written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes

keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the resident.

NOTE: See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about CMHA 's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

CMHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. CMHA will, however, act as quickly as possible to move a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a resident reasonably believes a proposed transfer would not be safe, the resident may request a transfer to a different unit. If a unit is available, the transferred resident must agree to abide by the terms and conditions that govern occupancy in the unit to which the resident has been transferred. CMHA not able to transfer a resident to a particular unit if the resident has not or cannot establish eligibility for that unit.

If CMHA has no safe and available units for which a resident who needs an emergency is eligible, CMHA will offer a Housing Choice Voucher to the resident and/or identify other housing providers who may have safe and available units to which the resident could move. At the resident's request, CMHA will also assist residents in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Residents

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the resident is urged to take all reasonable precautions to be safe.

National Resources:

Residents who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Residents who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://www.rainn.org/>

Residents who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>

Local Resources:

Residents who are or have been victims of domestic violence may contact the local shelter YWCA at 513-872-9259 or **Toll-Free: 888-872-9259 (TTY accessible)**, or Women Helping Women at 513-381-5610. Persons with hearing impariment can be accessed by calling 513-977-5545 (TTY)

Residents who are or have been victims of domestic violence, dating violence, sexual assault, or stalking may contact the Cincinnati Police Department (CPD) — Victims Outreach Office at 513-352-3542, or visit online at <https://cincinnati-oh.gov/police>

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

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.

B.6 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?

Y N
☒ ☐

(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

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.

CMHA mailed 70 participation letters and received 11 responses. The results are as follows:

CAPITAL SUBMISSIONS:

- 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

ACOP – Lease Agreement Rules:

- 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

ACOP – Admissions/Wait List:

- 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

ACOP – Other Recommendations:

- 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.

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.)

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:

- (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:

- (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

RESPONSE

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 - *Email Acknowledging Public Comment*. You have not submitted a follow up response to this inquiry.

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.

SUMMARY

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.

B.7 Certification by State or Local Officials.

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

**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)

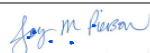
Name of Authorized Official

Joy Pierson

Title

COMMUNITY DEVELOPMENT
ADMINISTRATOR

Signature



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 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, 3030, 1002; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Aisha Tzillah

Signature

Title

COMMUNITY DEVELOPMENT
ADMINISTRATOR

Date

April 1, 2020

Instructions for Preparation of Form HUD-50075-5Y

5-Year PHA Plan for All PHAs

A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

B.1 Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. ([24 CFR §903.6\(a\)\(1\)](#))

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. ([24 CFR §903.6\(b\)\(1\)](#)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. ([24 CFR §903.6\(b\)\(2\)](#))

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. ([24 CFR §903.6\(a\)\(3\)](#))

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB provide comments?
- (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.17\(a\)](#), [24 CFR §903.19](#))

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.
