

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

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

**Definitions.**

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

<b>A.</b>	<b>PHA Information.</b>																								
A.1	<p>PHA Name: <u>Cincinnati Metropolitan Housing Authority</u> PHA Code: <u>OH004</u>            PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA            PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2021</u>            PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)            Number of Public Housing (PH) Units <u>4,674</u> Number of Housing Choice Vouchers (HCVs) <u>11,663</u> Total Combined Units/Vouchers <u>16,337</u>            PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:											
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<b>B.</b>	<b>Annual Plan Elements</b>																								

**B.1 Revision of PHA Plan Elements.**

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

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

**(B) If the PHA answered YES for any element, describe the revisions for each revised element(s):**  
**STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS:**

**Housing Needs of Families on the PHA's Waiting Lists**

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

	# of families	% of total families	Annual Turnover
Waiting list total	6487		
Extremely low income <=30% AMI	6473	99.78%	
Very low income (>30% but <=50% AMI)	10	.15%	
Low income (>50% but <80% AMI)	4	.06%	
Families with children	6425	99.04%	
Elderly families	402	6.20%	
Families with Disabilities	1454	22.41%	
Race/ethnicity: White	850	13.10%	
Race/ethnicity: Black	5584	86.08%	
Race/ethnicity: Native American	37	.57%	
Race/ethnicity: Asian	7	.11%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR (Includes 21-0 BR)			
2 BR			
3 BR			
4 BR			
5 BR			

5+ BR

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

If yes:  
*How long has it been closed (# of months)?*  
 Does the PHA expect to reopen the list in the PHA Plan year?  No  Yes  
 Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No  Yes (e.g., specific bedroom sizes may be left open)

**Housing 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	15613		895
Extremely low income <=30% AMI	15416	98.55%	
Very low income (>30% but <=50% AMI)	190	1.21%	
Low income (>50% but <80% AMI)	37	.24%	
Families with children	14155	90.66%	
Elderly families	1414	9.04%	
Families with Disabilities	3218	20.57%	
Race/ethnicity: White	2168	13.86%	
Race/ethnicity: Black	12918	82.58%	
Race/ethnicity: Native American	74	.47%	
Race/ethnicity: Asian	29	.19%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR (Includes 21-0 BR)	8965	57.42%	
2 BR	3807	24.38%	
3 BR	2086	13.36%	
4 BR	577	3.70%	
5 BR	152	.97%	
5+ BR	26	.17%	

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 2021-2022 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 1,150 referrals. \*\* 30 points
- Referral from Asset Management/LIPH when a family or individual cannot be housed because of extenuating circumstances. \*\* increased to 80 preference points.
- Youths aging out of foster care age 18-24: Youth who can verify that they were residents of a state-run foster care system within twelve months of the onset of adulthood or emancipation increased up to 100 referrals. \*\* 30 points.
- Preference for referrals of persons evicted from market rate housing up to 50 referrals removed.

**2. Chapter 11 - Housing Quality Standards and Inspections**

- Language added to state CMHA may also conduct inspections by using Remote Virtual Inspection Process. (RVI)

**FINANCIAL RESOURCES:**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2020 grants)</b>		
a) Public Housing Operating Fund	\$26,178,927.00	
b) Public Housing Capital Fund	\$12,305,960.00	
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$87,415,053.00	
d) Other Federal Grants (list below)	\$365,821.00	
e) Family Self Sufficiency	\$343,674.00	Section 8 Supportive Services
f) NSP2		NSP2 development
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
a) Regional Opportunity Counseling	\$0	Section 8 Tenant Based Assistance
b) Family Self Sufficiency	\$0	Section 8 Supportive Services
c) Resident Opportunity and Self-sufficiency Grants	\$0	Public Housing Supportive Services
d) Capital	\$869,306.00	Public Housing Capital Improvements
e) HOPE VI Revitalization	\$0	

<b>3. Public Housing Dwelling Rental Income</b>		
a) Rental Income	\$9,553,723.00	Public Housing Operations
<b>4. Other income</b> (list below)		
a) Excess Utilities		Public Housing Operations
b) Non-dwelling Rental		
c) Interest & Other Income		
<b>5. Non-federal sources</b> (list below)		
<b>Total resources</b>	\$137,033,464.00	

**VAWA UPDATE:**

During calendar year 2020, CMHA received **92** submissions for the transfers under the Violence Against Women Act (VAWA); **66** of the transfer requests were from the Asset Management program and **26** 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 assailant. CMHA has developed its emergency transfer plan as 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 2021-2022 Admissions and Occupancy Policy (ACOP)**

CMHA is proposing changes to the Asset Management Admissions and Continued Occupancy Policy (ACOP). A summary of the proposed updates to the ACOP and Lease follows below:

**CMHA PUBLIC HOUSING FLAT/CEILING RENTS**

The 2014 Appropriations Act requires PHAs to establish flat rents at no less than 80 percent of the fair market rent (FMR) to be updated annually. If the current flat rents are below the threshold, the PHA is required to revise its flat rent schedule to **at least 80 percent** of FMR. Because some of the current flat rents are below 80 percent of the (FMR), adjustments must be made to meet the guidelines. The chart above reflects the proposed changes to the current flat rent schedule. Below are the figures used to determine if the CMHA's flat rent schedule meets HUD requirements.

**Fair Market Rents FY 2019 Hamilton County**

Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
\$604	\$698	\$916	\$1244	\$1425	\$1638

**80 Percent of FY 2019 Fair Market rents**

Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
\$483	\$558	\$733	\$995	\$1140	\$1310

**Current Flat Rents**

Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
\$468	\$536	\$707	\$978	\$1131	\$1301

**Section I – Non-discrimination and Accessibility**

Added language to ensure equal access to housing is extended to and protected for individuals regardless of sexual orientation or Gender Identity.

- 1. Compliance with Civil Rights Laws
  - h. The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012 and further clarified in Notice PIH 2014-20

**Section II – Eligible for Admission and Processing of Applications**

CMHA will may opt to conduct interviews, orientations, good neighbor and other admissions activities via phone or virtually. This removes language that implies in person appointments. In response to the adverse impact on families in need of affordable housing, CMHA has added “COVID-19 Impacted Applicant” category to its local preferences as a means to assist families that have been adversely impacted by COVID-19 and are seeking housing with CMHA. Finally, CMHA clarifies language in this section that applicants will be placed on the wait list based on their preference points and then application date and time.

**D. Processing Applications for Admissions**

- 2 Interviews and Verification Process: As applicants approach the top of the waiting list, they will be contacted for an interview to complete their applicant file. Applicants who fail to complete the interview process or who cannot be contacted to schedule an interview will have their applications withdrawn, subject to reasonable accommodations for people with disabilities.

**F. Local Preferences and Unit Selection**

- d. Good Neighbor Program: Completion of CMHA’s Good Neighbor Program. The Good Neighbor program is a voluntary challenge program designed to educate applicants about CMHA housing and the aspects of life management. This program does not exclude the applicant from viewing the New Resident Orientation and completing the acknowledgement certification.

**F. Local Preferences and Unit Selection**

Add: COVID-19 Impacted Applicant – Self Certification Only – 4pts

**Definition:** COVID-19 Impact Application – Preference points will be given to individuals impacted by COVID-19 due to the decrease or loss of income, housing and educational access for children. Individual within this category may self-certify their eligibility for the preference points.

**4. Method for Applying Preferences**

Points are given to each applicant that meets the qualifications for the specific preferences. All points are totaled and families are placed on each site-based waiting list pursuant to their preference total then by application date and time.

CMHA’s Eligibility Department will select applicants to begin the interview and verification process based on the applicant’s preference points, then by date and time of their application.

**Section III – Tenant Selection and Assignment Plan**

Removing language that references a second sorting of the wait list. This process is no longer possible with the new property management system. Removal of this language will ensure consistency throughout the document.

**Section III – Tenant Selection and Assignment Plan**

**B. Unit Offers to Applicants**

- 2. CMHA will first match the characteristics of the unit available with the highest ranking applicant for a unit of that size, type and special features (if any), taking into account any limitations on admission, i.e. designated housing (if applicable).

## Section V – Transfer Policy

To streamline the transfer process, residents will submit their transfer requests directly to the Relocation Supervisor. Reinstatement of the Good Record Requirement for Transfers.

### A. Processing Transfers

1. A centralized transfer waiting list will be administered by CMHA's Relocation Department. The administration of the centralized transfer list will be managed and processed by date and time of submission. Emergency transfers, as defined by this Section, will be given priority over other date and time transfers. Residents are responsible for submitting requests for transfer, including necessary documentation to CMHA.

### D. Good Record Requirement for Transfers

1. In general, and in all cases of resident-requested transfers (voluntary), residents will be considered for transfers only if the head of household, any other family members or guests for the past two years:
  - a. have not engaged in drug-related or criminal activity that threatens the health and safety of residents and staff;
  - b. do not owe back rent or other charges;
  - c. meet reasonable housekeeping standards and have no housekeeping lease violations for the past two years;
  - d. can get utilities turned on in the name of the head of household (applicable only to properties with tenant-paid utilities); and
  - e. Exceptions to the good record requirements may be made for emergency transfers, mandatory transfers or when it is necessary for CMHA (e.g. a single person is living alone in a three-bedroom unit and does not want to move) to move forward with the transfer. The determination to make an exception to the good record requirement will be made by the Director of Housing Management, taking into account the recommendation of the property manager.

## Section IX – Family Debts Owed to CMHA

CMHA Property Management Office no longer accept payments in the office. Payments are accepted via mail, online, telephone or ACH withdrawal.

### C. Late Payments

4. CMHA may, at its sole discretion, allow a tenant that has made two late payments of rent in a twelve (12) month period to sign a "Seventh Day Agreement" whereby the tenant agrees to make timely payments to a location of CMHA's designation, for a twelve (12) month period. <sup>1</sup> If the tenant fails to make any timely payment, CMHA may refuse to accept late rent and file an eviction action against the tenant.

The Cincinnati Metropolitan Housing Authority (CMHA) released a proposed Significant Amendment to its current FY2021 Housing Choice Voucher Administrative Plan and the Asset Management Admissions and Continued Occupancy Policy (ACOP) on <date> and has commenced a forty-five day comment period. Pursuant to Section 511 of the Qualified Housing and Work Responsibility Act of 1998, and 24 CFR 903, a copy of the proposed changes to the Admin. Plan and the ACOP can be found along with CMHA's most recently approved annual plans, supporting documents, and proposed updates at 1627 Western Ave, or on-line at [www.cintimha.com](http://www.cintimha.com). These are available for public inspection during normal business hours (Monday- Friday 8:00 AM – 4:40 PM). During the 45-day public comment period you may submit written comments to the address above or by email to Joy.gazaway@cintimha.com.

### **(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.

<sup>1</sup> Note: In lieu of rental office, payments may be made at office of CMHA's designation.

**Asset Management Programs:**

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

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

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.

**B.2**

**Significant Amendment and Standard Deviation**

**1. Definition of Substantial Deviation/Modification**

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

**“Significant Amendment” is defined as follows:**

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

The following are not considered significant amendments:

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



11. Additions of non-emergency work items 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 is in the early stages of planning developing the remaining vacant parcel in the Hope VI neighborhood of Lincoln Ct and Laurel Homes. CMHA is planning to develop these vacant parcel either through self-development or with a development partner. Preliminary plan includes single family homes (row style) at AMI 60-115% and traditional market rate sales. The exterior will match as closely as possible the exiting neighborhood.

**CHOICE NEIGHBORHOODS:**

The U.S. Department of Housing and Urban Development’s Choice Neighborhoods program was first funded by Congress in 2010 replacing and expanding on the HOPE VI program. Choice Neighborhoods has three goals: 1) to transform distressed housing, 2) to support positive outcomes for families in the targeted neighborhood, and 3) to transform neighborhoods of poverty into viable neighborhoods with access to well-functioning services. Choice Neighborhood parameters include the requirement of one-for-one replacement, resident involvement, right-to-return if lease compliant, activities and services to promote self-sufficiency, and the inclusion of energy-efficient design principles. There are two types of Choice Neighborhoods grants: a) Planning grants assist selected communities in creating a plan for transformation and to build community support, b) Implementation grants are for those communities who already have a Transformation Plan, community support and have proven the capacity to leverage additional financial resources and resources to be able to begin the transformation of the community.

In 2020, CMHA partnered with the Stanley Rowe Resident Council, Jurisdiction -Wide Advisory Board (J-RAB), Residents from Stanley Rowe Towers, Stanley Rowe Rowhouses, Liberty Street Apartments and over 35 local organizations to develop a Choice Neighborhoods Planning Grant application that was submitted to HUD on September 13, 2020 requesting funds to develop a Transformation Plan for the West End. On December 16, 2020, the U.S. Department of Housing and Urban Development notified CMHA that the community was awarded a Fiscal Year 2020 Choice Neighborhoods Planning Grant in the amount of \$410,000 to develop a Transformation Plan for the West End and to revitalize the following target public housing sites: Stanley Rowe Towers (AMP 215) 358 public housing units, Stanley Rowe Rowhouses (AMP 214) 66 family units and Liberty Street Apartments (AMP 214) 130 family units. The Choice Neighborhoods Planning Grant award period of performance start date is December 16, 2020 and the end date is March 31, 2023, during which CMHA will lead a collaborative planning process that includes J-RAB, the Stanley Rowe Resident Council, Residents from Stanley Rowe Towers, Stanley Rowe Rowhouses and Liberty Street Apartments, as well as neighborhood partners and local leaders. The West End Transformation Plan will identify strategies to implement public housing revitalization, the coordination and design of supportive services, and neighborhood-level planning to enhance a range of neighborhood assets.

To build on these efforts, CMHA plans to collaborate with the J-RAB, the Stanley Rowe Resident Council, Residents from Stanley Rowe Towers, Stanley Rowe Rowhouses, Liberty Street Apartments and Community Partners to apply for a Choice Neighborhoods Implementation Grant in 2022 or 2023 and any other HUD funding available to implement the West End Transformation Plan that was developed as part of the collaborative Choice Neighborhoods planning process and to revitalize the Stanley Rowe Towers, Stanley Rowe Rowhouses and Liberty Street Apartments public housing sites. CMHA may also pursue other funding in order to leverage HUD funding.

## 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.

Northside – CMHA is considering the development of affordable units in Northside

Pendleton/OTR – CMHA is considering the development of affordable units on vacant land in North College Hill.

West End – Single Family Homeownership opportunities will be provided on vacant lots in Lincoln and Laurel.

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 \$8,345,822 at 6/30/2020. 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 731 units from public housing and therefore can remove approximately 450 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: <b>Marianna Terrace</b>	Pic Development ID: <b>OH004-000204</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>76</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$191,616.52</b> (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	12	
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: <b>Scattered Sites</b>	Pic Development ID: <b><u>OH004-000205</u></b>	Conversion Type (i.e., PBV or PBRA): <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b><u>N/A</u></b>
Total Units: <b>24</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Capital Fund Allocation of Development: <b><u>\$60,510.48</u></b> (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: <b>Findlater Gardens</b>	Pic Development ID: <b><u>OH004-000210</u></b>	Conversion Type (i.e., PBV or PBRA): <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b><u>N/A</u></b>
<b>653</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Capital Fund Allocation of Development: <b><u>\$1,646,389.31</u></b> (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:	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):
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<b>Stanley Rowe and Liberty St. Apts.</b>	<b><u>OH004-000214</u></b>	<b><u>PBRA/Section 18 PBV</u></b>	<b><u>N/A</u></b>
Total Units:  <b>554</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.):  <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.):  <b>Family</b>	Capital Fund Allocation of Development:  <b>\$1,396,783.58</b> (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 #5**

Name of Public Housing Development:  <b>Maple Tower</b>	Pic Development ID:  <b><u>OH004-000211</u></b>	Conversion Type (i.e., PBV or PBRA):  <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):  <b><u>N/A</u></b>
Total Units:  <b>120</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.):  <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.):  <b>Family</b>	Capital Fund Allocation of Development:  <b>\$302,552.40</b> (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 #6**

Name of Public Housing Development:  <b>Beechwood</b>	Pic Development ID:  <b><u>OH004-000211</u></b>	Conversion Type (i.e., PBV or PBRA):  <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):  <b><u>N/A</u></b>
Total Units:  <b>149</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.):  <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.):  <b>Family</b>	Capital Fund Allocation of Development:  <b>\$375,669.23</b> (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	13	
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 #7**

Name of Public Housing Development: <b>Winton Terrace</b>	Pic Development ID: <b>OH004-000209</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>608</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$1,532,932.16</b> (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 #8**

Name of Public Housing Development: <b>Millvale</b>	Pic Development ID: <b>OH004-000217</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>468</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$1,179,954.36</b> (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 #9**

Name of Public Housing Development: <b>San Marco</b>	Pic Development ID: <b>OH004-000212</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
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:

<b>30</b>	<b>Family</b>	<b>Family</b>	<b>\$75,638.10</b> (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 #10**

Name of Public Housing Development: <b>Riverview</b>	Pic Development ID: <b>OH004-000212</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>110</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$277,339.70</b> (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	0	
One Bedroom	81	100	
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 #11**

Name of Public Housing Development: <b>The Redding</b>	Pic Development ID: <b>OH004-000213</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>100</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$252,127.00</b> (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 #12**

Name of Public Housing Development: <b>Marquette Manor</b>	Pic Development ID: <b>OH004-000218</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>140</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$352,977.80</b> (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) <b>N/A</b>		

**Development #13**

Name of Public Housing Development: <b>The President</b>	Pic Development ID: <b>OH004-000213</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>96</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$242,041.92</b> (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) <b>N/A</b>		

**Development #14**

Name of Public Housing Development: <b>Scattered Sites – Bundle H</b>	Pic Development ID: <b>OH004-000201</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA/Section 18 PBV</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>28</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b>Family</b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b>Family</b>	Capital Fund Allocation of Development: <b>\$70,595.56</b> (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 #15**

Name of Public Housing Development: <b>Scattered Sites – Bundle J</b>	Pic Development ID: <b><u>OH004-000203</u></b>	Conversion Type (i.e., PBV or PBRA): <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b><u>N/A</u></b>
Total Units: <b><u>75</u></b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Capital Fund Allocation of Development: <b><u>\$189,095.25</u></b> (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 #16**

Name of Public Housing Development: <b>Acquisition Rehab MP1 (Project 12)</b>	Pic Development ID: <b><u>OH004000205</u></b>	Conversion Type (i.e., PBV or PBRA): <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b><u>N/A</u></b>
Total Units: <b><u>24</u></b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Capital Fund Allocation of Development: <b><u>\$39,842</u></b> (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 #17**

Name of Public Housing Development: <b>Scattered Site Central – Bundle K</b>	Pic Development ID: <b><u>OH004000201</u></b> <b><u>OH004000203</u></b> <b><u>OH004000204</u></b>	Conversion Type (i.e., PBV or PBRA): <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b><u>N/A</u></b>
Total Units: <b>60</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Capital Fund Allocation of Development: <b>\$99,605 (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b>
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) <b><u>N/A</u></b>		

**Development #18**

Name of Public Housing Development: <b>Scattered Site Fair Southeast - Bundle I</b>	Pic Development ID: <b><u>OH004000202</u></b> <b><u>OH004000203</u></b>	Conversion Type (i.e., PBV or PBRA): <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b><u>N/A</u></b>
Total Units: <b>76</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Capital Fund Allocation of Development: <b><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)</b>
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) <b><u>N/A</u></b>		

**Development #19**

Name of Public Housing Development: <b>Scattered Site Southwest – Bundle M</b>	Pic Development ID: <b><u>OH004000205</u></b> <b><u>OH004000206</u></b>	Conversion Type (i.e., PBV or PBRA): <b><u>PBRA/Section 18 PBV</u></b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b><u>N/A</u></b>
Total Units: <b>80</b>	Pre: RAD Unit Type (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Post-RAD Unit type if different (i.e., Family, Senior, etc.): <b><u>Family</u></b>	Capital Fund Allocation of Development: <b><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)</b>

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 or 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
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AMP	Development	Dev #	Type	Status	Date	Effected Area	Timeline	Narrative	
201	1708-1726 Race Street	OH004-39	Demo/ Dispo	Planned	4/21	23 Units	Partial	4/22-4/23	CMHA does not plan to reduce its housing unit count
201	122 & 130 McMicken Ave	OH004-40	Dispo	Planned	4/21	5 Units	Partial	4/22-4/23	CMHA does not plan to reduce its housing unit count
208	415-437 Rockdale	OH004-40	Demo/ Dispo	Planned	7/21	12 Units	Partial	8/22-8/23	CMHA does not plan to reduce its housing unit count
201	4048 Ledgewood	OH004-39	Dispo	Planned	7/21	12 Units	Partial	8/22-8/23	CMHA does not plan to reduce its housing unit count
208	415-417 Catherine	OH004-23	Demo/Dispo	Planned	7/21	4 Units	Partial	10/22-10/23	CMHA does not plan to reduce its housing unit count
208	418 Kasota	OH004-40	Demo/Dispo	Planned	7/21	7 Units	Partial	10/22-10/23	CMHA does not plan to reduce its housing unit count
211	3460 Hallwood Lane	OH004-19	Dispo	Planned	04/21	Land Only	Partial	4/21-4/22	
218	1999 Sutter (Marquette)	OH004-11	Demo/ Dispo	Planned	10/21	140 Units	Partial	10/21-10/22	CMHA does not plan to reduce its housing unit count
218	English Woods Land	OH004-04	Dispo	Planned	4/21	Land Only	Total	10/21-10/22	
	Laurel Homes	City West	Dispo	Amend approval	9/19	Land Only	Partial	12/20-12/25	
	Grandview	OH004-39	Dispo	Planned	10/21	Land Only	Partial	1/22-1/23	
	1813 Wyoming	OH004-40	Dispo	Planned	4//2021	Building and Land	Partial	4/21-10/21	
	1237 Beech	OH004-40	Dispo	Planned	4//2021	Building and Land	Partial	4/21-10/21	
	36 Ridge	OH004-45	Dispo	Planned	4/2021	Building and Land	Partial	4/21-10/21	

	1636 Pasadena	OH004-45	Dispo	Planned	4/2021	Building and Land	Partial	4/21-10/21	
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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

A designated housing plan has been developed for each of the developments below:

Development Name	Designation Type	Application Date	Approval Date	Number of units Affected
West Union Square	Elderly	02/21/17	03/20/17	19
Central YMCA	Elderly	02/21/17	03/20/17	15
Cary Crossing	Disabled			8
Riverview Apartments	Elderly	10/24/19	12/31/19	109
Redding Apartments	Elderly	10/24/19	12/31/19	99
President Apartments	Elderly	10/24/19	12/31/19	95

**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.

**B.4 Most Recent Fiscal Year Audit.**

(a) Were there any findings in the most recent FY Audit?

Y N

(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.



**B.5**

**Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

**CMHA Goals and Objectives:**

Strategic Goals

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.

Annual Goals:

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.

**CMHA Progress Report:**

In 2019 CMHA accomplished the following:

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.

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

The Cincinnati Metropolitan Housing Authority requested that the Resident Advisory Board, as well as ALL members of the Resident Councils, engage in a program to gain their input for the 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 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 2 responses. The results are as follows:**

**CAPITAL SUBMISSIONS:**

- Make sure the boiler system works. Bleed lines in each apartment to help individual heaters.
- Replace all faucets in bathrooms and kitchens

**ACOP – Lease Agreement Rules:**

- With proof of enrollment in area schools, grandparent could keep children during the school year. An addendum to the lease could be placed in the tenant file for the school year from Sept to May

**ACOP – Admissions/Wait List:**

- Residents with mental disabilities should be referred to other facilities so they can get the care that they need. .

**ACOP – Other Recommendations:**

- Seniors that have severe health issues (like oxygen) could be taken care of by a care team.
- Management to keep a list of residents that must be checked on in case of a power outage or another emergency.
- Make sure garbage can areas are deodorized and free of odors
- Make sure utility closets are clean on each floor. (drains clear, new garden hose attached, fresh mop and bucket and cleaning supplies.)

**ANNUAL PLAN COMMENTS FOR FY2021-2022  
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.

**COMMENT PERIOD RUNS FROM 01/22/21 -03/07/21**

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, Aisha Tzillah, the Community Development Administrator  
*Official's Name* *Official's Title*

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

Cincinnati Metropolitan Housing Authority  
*PHA Name*

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

City of Cincinnati, Ohio  
*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.

CMHA's FY2021-2022 Annual Plan is consistent with the City of Cincinnati's 2020 – 2024 Consolidated Plan with providing affordable housing units in the City of Cincinnati.

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
Aisha Tzillah	Community Development Administrator
Signature	Date
	January 19, 2021

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

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

CINCINNATI METROPOLITAN HOUSING AUTHORITY  
*PHA Name*

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

HAMILTON COUNTY, OHIO  
*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.

CMHA's FY2021-2022 Annual Plan is consistent with Hamilton County's 2020-2024 Consolidated Annual Plan and the 2021 Annual Action Plan. CMHA continues to strive to build new affordable housing units in Hamilton County. They continue to partner with organizations and lenders throughout Hamilton County and the State of Ohio to raise funds for the rehabilitation of the existing affordable housing inventory to make it sustainable into the future.

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 M PIERSON

Signature

*Joy M Pierson*

Title

COMMUNITY DEVELOPMENT  
ADMINISTRATOR

Date

1/19/2021

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<b>B.8</b>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y    N    N/A  <input type="checkbox"/>   <input type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C.</b>	<p><b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> <p>According to The Public Housing Capital Fund Program Final Rule published in the Federal Register October 24, 2013 (Docket No. 5236-F-02) this information is no longer included.</p>
<b>C.1</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD EPIC 50075.2 approved by HUD May 12, 2020 CFP Five-Year Action Plan 2020-2024</p>