

## **Significant Amendment to CMHA's FY2021 Annual Plan**

The Cincinnati Metropolitan Housing Authority (CMHA) is amending its Annual Plan to allow for the potential of 1) the Section 18 Disposition of 1 units at 4637 Ashtree (AMP 207). Updates are highlighted below in yellow.

### **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                                   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
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- 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.

**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 perseveration of sustainable affordable housing units that provide choice and opportunity for our residents. To accomplish this objective and after due diligence, concepts such as acquisition/rehabilitation, new construction for replacement units as well as conversion of rental single family homes to homeownership and review of other funding programs are being considered and implemented. Some of these options are discussed throughout this annual plan.

The following table is utilized to reflect Demolition/Disposition activities.

Column 1a and 1b identify the development name and HUD project number associated with the development.

Column 2 describes whether CMHA is pursuing demolition or disposition.

Column 3 reflects the status of application each year, such as if it is an application CMHA intends to submit (Planned application), or if the application has been submitted and we are either waiting approval (Submitted, pending approval) or it has been approved.

Column 4 provides a date that Column 3 indicated status is to be achieved or has been achieved, for example if the Column 3 status indicates "planned application", then the date in section 4 reflects estimated date the CMHA plans to submit the application.

Column 5 and 6 speak to how many units and whether the entire development or portion of the development is impacted.

Column 7 provides an estimated start and end date of when the activity of demolition/disposition may begin after the agency has an approved application. The first step of any activity begins with potential relocation and procurement of all funding sources and contractors.

*Demolition/Disposition Activity Description Table*

	1a.	1b.	2	3	4	5	6	7	8
AMP	Development	Dev #	Type	Status	Date	Effectuated Area		Timeline	Narrative
201	1708-1726 Race Street	OH004-39	Demo/ Dispo	Planned	4/21	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	
	4637 Ashtree	OH004-29	Dispo	Planned	4/2021	Building and Land	Partial	4/21-10/21	
	7 East McMillan	OH004-77	Dispo	Planned	4/2021	Building and Land	Partial	4/21-10/21	

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
<b>AMP</b>	<b>Number of Units</b>	<b>Type</b>	<b>Status</b>	<b>Timeline (actual disposition)</b>	<b>Narrative</b>
201	112	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	139	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,