

<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: 03/31/2024
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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, including changes to these policies, 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.** The 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 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, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																
A.1	<p>PHA Name: <u>Cincinnati Metropolitan Housing Authority</u>      PHA Code: <u>OH004</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA    <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2023</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>4,435</u> Number of Housing Choice Vouchers (HCVs) <u>11,800</u> Total Combined Units/Vouchers <u>16,235</u></p> <p>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 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"/> <b>PHA Consortia:</b> (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: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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**B. Plan Elements**

**B.1 Revision of Existing 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			
<input type="checkbox"/> Waiting list type: (select one) <input checked="" type="checkbox"/> <b>Public Housing</b> <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/sub-jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	15860		800
Extremely low income <=30% AMI	15701	99.22%	
Very low income (>30% but <=50% AMI)	232	1.46%	
Low income (>50% but <80% AMI)	28	0.18%	
Families with children	4,906	30.92	
Elderly families	1,347	8.49%	
Families with Disabilities	3007	18.07%	
Race/ethnicity: White	2311	14.56%	
Race/ethnicity: Black	12617	79.56%	
Race/ethnicity: Native American	310	1.95%	
Race/ethnicity: Asian	161	1.01%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR (Includes 21-0 BR)	10469	66.00%	

2 BR	3132	19.74%
3 BR	2110	13.30%
4 BR	645	4.06%
5 BR	146	0.09%
5+ BR	4	0.03%
Is the waiting list closed (select one)? <b>No</b> 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)		

Waitlist: HCV2023

## B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHA-wide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting List Type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing If used, identify which development/sub-jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	4573		893
Extremely low income <=30% AMI	3690	80.69%	
Very low income (>30% but <=50% AMI)	634	13.86%	
Low income (>50% but <80% AMI)	249	5.45%	
Families with children	907	19.8%	
Elderly families	56	1.2%	
Families with Disabilities	576	12.6%	
Race/ethnicity (White)	543	11.9%	
Race/ethnicity (Black)	4023	88.0%	

Race/ethnicity (Asian/Other)	134	2.9%	
Race/ethnicity (Hispanic)	34	0.7%	
Characteristics by Bedroom Size (PH Only)			
1 BR	0	0.0%	
2 BR	0	0.0%	
3 BR	0	0.0%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes:			
How long has it been closed (# of months)? January '23 - 12 months			
Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			

(c) The PHA must submit its De-concentration Policy for Field Office review.

**DE-CONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION AND ADMSSIONS**

**De-concentration Plan:**

It is the policy of the Cincinnati Metropolitan Housing Authority to provide for de-concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. CMHA does this by allowing its pool of applicants in the asset management program to have unfettered choice from the asset management waitlists for asset management housing. The applicant's choice of housing is based on the applicant's decision as to which location would best provide for their housing in light of available employment, educational opportunities, family and community support.

Additionally, the CMHA will support measures to raise the incomes of households that currently reside in its housing programs through the Family Self Sufficiency programs.

**Asset Management Programs:**

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.

**VAWA UPDATE**

During calendar year 2023, CMHA received 66 submissions for the transfers under the Violence Against Women Act (VAWA); 52 of the transfer requests were from the Asset Management program and 14 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 2024-2025  
CMHA HCV Administrative Plan**

**1. Chapter 4**

- **ESTABLISHING PREFERENCES AND MAINTAINING THE WAIT LIST**

Language in sections B & F modified to increase preference points for special referral groups.

- Youths aging out of foster care age 18-24: Youth referred for assistance by Lighthouse Youth Services or Hamilton County Job and Family Services who were residents of a state-run foster care system within twelve months of the onset of adulthood or emancipation up to 100 referrals. \*\* 33 points from 30 points
- Referral from Hamilton County Reentry Program: This preference applies to individuals or families, referred to CMHA by the Hamilton County Office of Reentry. The Hamilton County Office of Reentry works with a population of individuals returning from correctional institutions to the community up to 5 referrals. 35 points from 32 points.

**2. Chapter 12**

- **OWNER RENTS, RENT REASONABLENESS, AND PAYMENT STANDARDS**

**II. [24 CFR 982.502, 982.503, 982.504, 982.505, 982.507]**

Language added to clarify the effective date of contract rent adjustments.

- An interim certification will be completed by CMHA effective for the first of the month following the processing of the certification and proper notice to the client. CMHA must also provide a 30-day notice to the family if the adjustment increases the tenant's rental portion.

**FINANCIAL RESOURCES**

**Financial Resources:  
Planned Sources and Uses**

Sources	Planned \$	Planned Uses
<b>1. Federal Grants (FY 2022 grants)</b>		
a) Public Housing Operating Fund	\$38,036,153.00	
b) Public Housing Capital Fund	\$ 4,210,773.00	
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$90,989,535.00	
d) Other Federal Grants (list below)	\$276,990.00	Choice Neighborhood Planning Grant
e) Family Self Sufficiency	\$313,797.00	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	\$5,051,777.00	Public Housing Capital Improvements
e) HOPE VI Revitalization	\$0	
<b>3. Public Housing Dwelling Rental Income</b>		
a) Rental Income	\$10,511,119.00	Public Housing Operations
<b>4. Other income (list below)</b>		
a) Excess Utilities	\$0	Public Housing Operations
b) Non-dwelling Rental	\$44,798.00	
c) Interest & Other Income	\$6,440.00	
<b>5. Non-federal sources (list below)</b>		
<b>Total resources</b>	<b>\$149,441,382.00</b>	

# Summary of Proposed Changes to the 2024-2025 CMHA Admissions and Continued Occupancy Policy and Lease Agreement

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

**New language is indicated in red.** Deleted language is shown as ~~strikeout~~.

Effective January 1, 2024, the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) takes into effect and the updates in the Housing Choice Voucher Administrative Plan meet these HUD requirements to update the Administrative Plan and Admissions and Continued Occupancy Policy with the regulation changes. Additional information can be found on the HUD website at: [https://www.hud.gov/program\\_offices/housing/mfh/hotma#:~:text=Background,to%20income%20calculation%20and%20reviews](https://www.hud.gov/program_offices/housing/mfh/hotma#:~:text=Background,to%20income%20calculation%20and%20reviews).

## Section VI - Eligibility for Continued Occupancy, Over Income Households, Annual Recertification and Remaining Family Members

### B. Over Income Households:

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

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

**At annual or interim reexamination, if a family's income exceeds the applicable over-income limit, CMHA will document the family file and begin tracking the family's over-income status.**

**If one year after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, CMHA will notify the family in writing that their income has exceeded the over-income limit. Additionally, if the family continues to be over-income for the next 12 consecutive months, the family will be subject to CMHA's over-income policies.**

**If, at any time during the 24-month grace period, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with CMHA's policy. If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification**

**CMHA will notify the family in writing that over-income policies no longer apply. If the family's income later exceeds the over-income limit again, the family is entitled to a new two-year grace period. CMHA will begin tracking over-income families once these policies have been adopted. CMHA may terminate tenancy for families whose income exceeds the limit for the program eligibility as described at 24 CFR 960.261.**

#### 28. Income from Assets and Trusts

- a. Bank Account Interest Income and Dividends

5. Self-certification of assets that generate income of less than ~~\$5,000~~ **\$50,000** (For established program participants)

#### 4. Family Assets

When family assets exceed \$50,000, CMHA will require the information necessary to determine the current cash value of the family's assets (the net amount the family would receive if the asset were converted to cash). Regardless of the value of a participant family's assets, third party verification must be obtained every three years

**Families with net assets over \$100,000 (after adjusted for inflation) would be ineligible from public housing. These calculations are subject to due process and the families will have an opportunity to request a review.**

**Families would be ineligible for assistance, if they own real property suitable for occupancy by that family and meet certain conditions (have an ownership interest, legal right to reside in, and authority to sell the property)**

**Exceptions may apply:**

- A family that receives assistance for the property from the Housing Choice Voucher Program
  - Property jointly owned with someone else, and occupied by the other owner who is not a member of the household receiving benefits
  - A Victim of domestic violence, dating violence, sexual assault, or stalking
  - A family that is offering the property for sale
- CMHA cannot waive the asset requirement but may allow the family 6 months before serving a termination of assistance notice and may allow the family to come into compliance during that time.

**5. Assets Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Recertification**

- b. If the family certifies that they have disposed of assets of \$50,000 or more for less than fair market value, verification is required that shows:
- (a) all assets disposed of for less than FMV, (b) the date they were disposed of, (c) the amount the family received, and (d) the market value of the assets at the time of disposition. Third-party verification will be obtained wherever possible. Income that would have been generated from the disposed of asset will be considered an asset during the annual recertification for two consecutive years. Any income that would have been calculated, had the asset been retained, will be used in calculating adjusted income.

**Section VII - Interim Rent Adjustments: Income-Based Rent**

1. CMHA will process interim changes in rent as follows:
  - (c) Combined household increases averaging ~~\$100~~ 10% or less per month between annual recertifications
    - CMHA will defer the increase to the next regular recertifications
    - When combined income increases average in excess of ~~\$100~~ 10% per month, rent will increase the first day of the second month based on all increases.

**Section XIV - Definitions and Procedures to be used in Determining Income and Rent**

**A. Annual Income (24 CFR 5.609)**

Annual income is the anticipated total income, monetary or not, from all sources, including net income derived from assets received by or on behalf of the family head and spouse/co-head (even if temporarily absent) and by each additional family member who is 18 years of age or older. In addition to unearned income by or on behalf of each minor dependent who is under 18 dependent years of age, not specifically excluded. Annual income includes all net income from assets for the 12-month period following the effective date of initial determination or recertification of income, exclusive of income that is temporary, non-recurring, or sporadic (as defined below), or is specifically excluded from income by federal statute. Annual income includes, but is not limited to, the following:

1. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
2. The net income from operation of a business or profession, including any withdrawal of cash or assets from the operation of the business. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining the net income from a business. An allowance for the straight-line depreciation of assets used in a business or profession may be deducted as provided in IRS regulations. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the business;
3. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for the straight-line depreciation of real or personal property is permitted. Any withdrawals of cash or assets will be considered as income, except when used to reimburse the family for cash or assets invested in the property;

If the Family has Net Family Assets in excess of ~~\$5,000~~ \$50,000 (adjusted annually using the CPI-W), Annual Income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook savings rate as determined by HUD;

**B. Items not included in Annual Income [24 CFR § 5.609] (Exclusions)**

Annual Income does not include the following:

1. Earned income of minors
2. Payments received for the care of foster children or foster adults (foster adults are usually individuals with disabilities, unrelated to the resident family, who are unable to live alone); This exclusion also applies to Tribal Kinship or guardianship care payments.
3. Distribution of principle from Irrevocable trusts, including Special Needs Trusts.
4. Veterans' aide and attendant care
5. FSS Escrow Deposits
6. Education Savings Accounts Distributions - Coverdell or any qualified tuition program under IRS section 529 and 530
13. Effective January 1, 2024, only eligible families currently participating in EID may continue to receive benefits up to 2 years from this date no new families will be added to the program.



**D. Adjusted Income**

- a. Child Care Expenses — A deduction of amounts anticipated to be paid by the family for the care of children under 13 years of age for the period for which Annual Income is computed, but only when such care is necessary to enable a family member to be gainfully employed, to seek employment or to further his/her education. Amounts deducted must be un-reimbursed expenses and shall not exceed: (a) the amount earned by the family member enabled to work that is included in annual income; or (b) an amount determined to be reasonable by CMHA when the expense is incurred to permit education or to seek employment.

A family whose eligibility for the child care expense deduction is ending may request a financial hardship exemption to continue the deduction. 24 CFR 5.611(d).

The PHA may grant hardships for households unable to pay rent due to households no longer eligible for the childcare expense deduction. The family must demonstrate that they are unable to pay their rent because of the loss of this deduction and the childcare expense is still necessary even though the family member is no longer employed or furthering their education. The duration of relief will be up to 90 days and the PHA may terminate the hardship exemption if they determine the family no longer needs it.

- c. Work-related Disability Expenses — A deduction of un-reimbursed amounts paid for attendant care or auxiliary apparatus expenses for family members with disabilities where such expenses are necessary to permit a family member(s), including the disabled member, to be employed. In no event may the amount of the deduction exceed the employment income earned by the family member(s) enabled to work.

Equipment and auxiliary apparatus may include but are not limited to: wheelchairs, lifts, reading devices for the visually impaired, and equipment added to cars and vans to permit their use by the disabled family member. Also included would be the annualized cost differential between a car and the cost of a van required by the family member with disabilities.

- (1) For non-elderly families and elderly families without medical expenses, the amount of the deduction equals the cost of all un-reimbursed expenses for work-related disability expense less ~~three~~ ten percent of Annual Income, provided the amount so calculated does not exceed the employment income earned.
- (2) For elderly families with medical expenses: the amount of the deduction equals the cost of all un-reimbursed expenses for work-related disability expense less ~~three~~ ten percent of Annual Income (provided the amount so calculated does not exceed the employment income earned) PLUS medical expenses as defined below.

Families who are already receiving a deduction for expenses that exceed 3% of gross annual income will now receive a deduction for expenses over 5% gross annual income. The percentage will increase by 2.5% annually until reaching the 10% threshold.

**2. For Elderly and Disabled Families Only:**

- a. Medical Expense Deduction — A deduction of un-reimbursed Medical Expenses, including insurance premiums, anticipated for the period for which Annual Income is computed.

Medical expenses include but are not limited to: services of physicians and other health care professionals, services of health care facilities, health insurance premiums (including the cost of Medicare), prescription and accepted non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical bills. To be considered by CMHA for the purpose of determining a deduction from income, the expenses claimed must be verifiable.

- (1) For elderly families without disability expenses, the amount of the deduction shall equal total medical expenses less ~~three~~ ten-percent of annual income.
- (2) For elderly families with both disability and medical expenses: the amount of the deduction is calculated as described in paragraph 1.d.(2) above.

- b. Elderly/Disabled Household Exemption — An exemption of ~~\$400-~~ \$525 per household. See Definitions, Section XV.

Families who are already receiving a deduction for expenses that exceed 3% of gross annual income will now receive a deduction for expenses over 5% gross annual income. The percentage will increase by 2.5% annually until reaching the 10% threshold

**E. Rent Computation**

2. The Minimum Rent shall be \$50 per month, but a hardship exemption shall be granted to residents who can document that they are unable to pay the \$50 because of a long-term hardship (over 120 days). Examples under which residents would qualify for the hardship exemption to the minimum rent include but may not be limited to the following:

e. The family is unable to pay rent due to unanticipated medical or disability expenses. 24 CFR 5.611(c)(1)-(c)(2)

f. Household no longer eligible for the childcare expense deduction CFR 5.611(d)

**Proposed Changes to the Lease Agreement**

**Lease Agreement II. Terms; F. Payments and Charges Due Under the Lease.**

Increased Late Fee from \$20.00 to \$25.00

3. Late Fee. Rent payments not received by CMHA by the seventh (7th) calendar day of the month in which such payments are due shall incur a late fee of Twenty-~~Five~~ Dollars (\$205). The late fee is also assessed if the rent is late because a check was returned for non-sufficient funds.

**VIII. ENTRY to PREMISES DURING TENANCY**

Clarified need for emergency entry into units

A. Tenant Responsibilities.

- 1) Tenant agrees that the duly authorized CMHA representative will be permitted to enter Tenant's dwelling during reasonable hours for the purpose of performing routine maintenance, making improvements or repairs, inspecting the unit, showing the unit for re-leasing, or other good cause.
- 2) If the tenant calls to request maintenance on the unit and the Tenant is absent from the dwelling unit when CMHA comes to perform maintenance, Tenant's request for maintenance shall constitute permission to enter.
- 3) Tenant's refusal to permit entry of premises after proper notification **or in the event of a recognized emergency** is a Lease violation and grounds for termination of the Lease.

B. CMHA's Responsibilities.

- 1) Except in cases of an emergency or in response to a tenant-generated work order request, CMHA shall give to Tenant at least 48 hours written notice that CMHA intends to enter the unit. CMHA may enter only at reasonable times.
- 2) CMHA may enter Tenant's dwelling unit at any time without advance notification when there is reasonable cause to believe that an emergency exists, such as a defective **or disconnected smoke detector or upon receipt of orders from building and health department outlining hazardous conditions**.
- 3) If Tenant and all adult members of the household are absent from the dwelling unit at the time of entry, CMHA shall, for any entry into the unit for which the Tenant did not receive prior notice, leave in the dwelling unit a written statement specifying the date, time and purpose of entry. A work order request constitutes permission for CMHA to enter the unit when the Tenant is absent.

**Pet Policy – Nuisance or Threat to Health or Safety**

Clarified when a pet would be subject to the immediate removal from the property.

Nothing in this policy prohibits CMHA or the appropriate Animal Control Authority from requiring the **immediate** removal of any pet from the property if the pet's conduct or condition is duly determined to constitute a nuisance or a threat to the health or safety of other occupants of the property or of other persons in the community.

The Cincinnati Metropolitan Housing Authority (CMHA) released a proposed Summary of Changes to its FY2025 Housing Choice Voucher Administrative Plan and the Asset Management Admissions and Continued Occupancy Policy (ACOP) on 01/19/2024 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 [Geri.Hernandez@cintimha.com](mailto:Geri.Hernandez@cintimha.com).

## **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"/>            |
| Hope VI or Choice Neighborhoods.   |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| Mixed Finance Modernization or Development.  |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| Demolition and/or Disposition.   |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| Designated Housing for Elderly and/or Disabled Families.   |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| Conversion of Public Housing to Tenant-Based Assistance.   |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.                   |                                     |
| <input type="checkbox"/>   | <input checked="" type="checkbox"/> |
| Occupancy by Over-Income Families.   |                                     |
| <input type="checkbox"/>   | <input checked="" type="checkbox"/> |
| Occupancy by Police Officers.  |                                     |
| <input type="checkbox"/>   | <input checked="" type="checkbox"/> |
| Non-Smoking Policies.  |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| Project-Based Vouchers.  |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| Units with Approved Vacancies for Modernization.   |                                     |
| <input checked="" type="checkbox"/>  | <input type="checkbox"/>            |
| 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 to develop the remaining vacant parcels in the Hope VI neighborhood of Lincoln and Laurel. CMHA is planning to develop these vacant parcels either through self-development or with a development partner. Lots will be sold for single family homeownership. CMHA is also working with a co-developer to rehab the units at City West.

**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, 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 with an end date of 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.

CMHA completed the two-year collaboration and submitted a Choice Neighborhoods Transformation Plan to HUD on December 16, 2022. The West End Choice Neighborhoods Transformation Plan reflects the voice and vision of the West End Neighborhood as heard through public housing resident assessments, focus groups, interviews, as well as resident and neighborhood meetings and workshops held in 2021/2022.

As the next step in the Choice Neighborhood process, CMHA issued an RFQ inviting Developers to submit development qualifications as Co-Developer under the West End Choice Neighborhoods Initiative. Respondents submitted information concerning capacity, qualifications, and experience as outlined in the RFQ. From that evaluation, it was determined that McCormack Baron Salazar would be joining the team in the next phase.

To build on these efforts, CMHA plans to collaborate with 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 2025 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.

As we move forward toward application of the Implementation Grant in 2025, CMHA will continue to work with our residents, The City of Cincinnati, West End Community Council and over 50 committed public and private partners to develop a shared vision and a custom-tailored road map towards lasting and significant transformation in the West End. The outreach plan to the community will continue with more meetings and focus groups with the Housing, Neighborhood and People Task Forces.

### **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 began construction on 42 units of affordable senior housing on Logan Street. The development will include the construction of one, 42-unit, four-story building, located at 1750 Logan Street. The project site, which is currently being used as a parking lot, will be transformed into Low Income Housing Tax Credit (LIHTC) development, creating affordable apartments for seniors. The Income restrictions will be maintained by a LIHTC regulatory agreement that will be executed at the time of loan closing.

The unit mix will be a combination of 42 units limited to those earning no more than 60% of the area median income (AMI) of which 73% will be held to low income residents at 50% AMI. Logan Commons will contain a unit mix comprised of one and two-bedroom units. Eleven of these units will be public housing units, so that HUD Capital Funding can be used for development of the project. These 11 units will be converted to Section 8 housing through the HUD RAD process within the next 5 years. All other units were previously awarded Project Based Vouchers (PBVs) through a competitive process. This allows HUD subsidy at market rate rents for these units, while still allowing affordability to residents at or below 60% AMI.

Fairmount / English Woods - CMHA may enter into a Master Development Agreement with a private development company for the transformation of the northern 40 acres of English Woods or may decide to sell the vacant land to a third party. If the property goes to a sale, CMHA will restrict the property to a use or uses that are not detrimental to the residents at Marquette Manor. Whether CMHA decides to co-develop the remaining property or sale the vacant land, the agreement(s) will be presented to the Board of Commissioners for final approval once the terms have been specified.

Pendleton -Bennett Point is a 56-unit new construction mixed income property project with commercial laundry space located in Pendleton and is currently under construction. Bennett Point applied for and received 9% Low-Income Housing Tax Credits. The project has just finished construction and leased up was complete in December 2023.

Avondale - CMHA is considering the development and/or rehabilitation of affordable units in Avondale. CMHA has plans for the rehabilitation of the Beechwood, Maple Tower, President and Redding properties through RAD Conversion.

Over-the-Rhine- CMHA is moving forward with the development of our Race Street properties to convert first floors back to retail and rehabilitate the residential units above the retail to affordable housing.

The Cincinnati Metropolitan Housing Authority (CMHA) is amending its PHA Plan because it plans to submit a Section 18 Partial Disposition Application to the Special Application Center (SAC) for Race Street Apartments, located at 1706-1728 Race Street in the 45202-zip code for a total of 28 units. The intent is to renovate twenty-three (23) units of the Race Street public housing development (PIC ID: OH004000201) as part of a Section 18 partial disposition application, followed by a request for Tenant Protection Vouchers that will be project-based. Four (4) units will be converted to RAD PBV units and nineteen (19) will be Section 18 PBV units.

The bedroom distribution of units to be disposed under Section 18 are as follows: six (6) one-bedroom units, ten (10) two-bedroom units, twelve (12) three-bedroom units. The 28 units are located in 7 buildings and are categorized as family units. There will be a reduction of five (5) units consisting of two (2) one-bedroom units, one (1) two-bedroom units and two (2) three-bedroom units that will be converted back into retail space on the first floor. All units will continue to operate as family units after the Section 18 repositioning is complete. The property does not include any fully compliant Uniform Federal Accessibility Standards (UFAS) units. Reconfiguration of 5% or ten (10) of the dwelling units, in accordance with UFAS standards, is required.

The estimated timeline for preparation, resident engagement, local governmental consultation, HUD review/approval of the Section 18 Application and Tenant Protection Vouchers is four months. The estimated timeline for renovation activities is 14 months following funding award, which is separate from the Section 18 Application.

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 may issue an RFQ for development partners for lots in the West End. CMHA is reviewing a full modernization of the Kindel property located in the West End.

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, College Hill, Harrison, Silverton and the City of Cincinnati.

### **RENTAL ASSISTANCE DEMONSTRATION**

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 was originally awarded a RAD Portfolio Award by HUD on June 11, 2018. This award reserved RAD conversion authority for 4,415 of CMHA’s public housing units. HUD subsequently issued a revised Portfolio Award on Sept. 15, 2019 in accordance with the revised RAD Notice, H-2019-09 PIH-2019-23 (HA). This notice converted all existing Multiphase awards to Portfolio awards and implemented changes to the requirements for existing awards.

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, participation, waiting list and grievance procedures as required by HUD. CMHA will comply with all fair housing and civil rights requirements. For all RAD conversions, CMHA will comply with all applicable site selection requirements as set forth in RAD Notice H 2016-17; PIH 2016-17 and in accordance with any additional applicable published guidance provided by HUD. CMHA will ensure the site selection complies with all applicable site and selection requirements according to the RAD notice. CMHA will also certify that, in conducting its review of site selection for the proposed project, the PHA completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA.

### **CURRENT RAD CHAPS:**

CMHA has active Commitments to Enter into a Housing Assistance Payment (CHAPs) on four properties: Beechwood (146 units), Winton Terrace (185 units) and Marquette Manor (140 units) and Riverview San Marco (131 units). Relocation will be required to complete these projects.

Beechwood: The Beechwood project was just awarded Bond Gap Financing from OHFA and is preparing to move forward with the RAD Conversion in 2024. CMHA has not submitted the Finance Plan for the Beechwood project at this time as the PHA is still finalizing the details of the financial structure of the project. Once underway, the Beechwood residents will experience temporary relocation while the project is being completed. The Beechwood Relocation Plan envisions a relocation process to occur over a 14-month construction schedule. The relocation will affect approximately 1 building totaling 149 units (Pre-RAD) and 146 units (Post-RAD) (0 Br-13/1 Br-133/2Br-1). Approximately 149 households may be affected. In accordance with the requirement of the Rental Assistance Demonstration (RAD) program, no current tenants will be permanently, involuntarily displaced. Furthermore, resident relocation for the project will not occur until after the RAD Conversation Commitment of the RAD transaction. Throughout the relocation process CMHA will comply with HUD Notice (or H 2014-09/PIH 2014-17), as applicable, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), fair housing and civil rights requirements and, if applicable Section 104(d).

Winton Terrace: CMHA is currently evaluating the Section 18 program for the disposition of 185 units at Winton Terrace. This would be a partial disposition application submitted to the Special Applications Center. Please see B.1 (b) and the below “Demolition and/or Disposition” table. CMHA plans to submit a Section 18 Disposition Application for one-hundred eighty-five (185) units in twenty-nine (29) buildings 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 Project Based Vouchers as a result of the disposition, thus creating a more stable funding source for these units. A 30-year use agreement will be tied to each unit restricting use of these properties to affordable housing.

The Cincinnati Metropolitan Housing Authority (CMHA) is amending its PHA Plan because it plans to submit a Section 18 Partial Disposition Application to the Special Application Center (SAC) for Winton Terrace Phase 1, located at 4646 Winneste Avenue in the 45232-zip code. The intent is to renovate one-hundred-eighty-five (185) units of the Winton Terrace public housing development (PIC ID: OH004000209) as part of a Section 18 partial disposition application, followed by a request for Tenant Protection Vouchers that will be project-based. The bedroom distribution of units to be disposed under Section 18 are as follows: eight (8) one-bedroom units, ninety (90) two-bedroom units, forty-seven (47) three-bedroom units, thirty-eight (38) four-bedroom units, and two (2) five-bedroom units. The 185 units are located in 29 buildings and are categorized as family units. All units will continue to operate as family units after the Section 18 repositioning is complete. The property does not include any fully compliant Uniform Federal Accessibility Standards (UFAS) units. Reconfiguration of 5% or ten (10) of the dwelling units, in accordance with UFAS standards, is required.

**Marquette Manor:** Marquette Manor Tower has 140 one-bedroom units and one property management office. The building is undergoing the RAD transition process and CMHA meets with residents on a quarterly basis to provide updates and answer any questions. Construction will begin on the project in January of 2025. The interior needs a complete gut rehab, including major items such as windows, lintels, HVAC, water lines, waste stacks, interior and exterior doors, insulation, kitchens, bathrooms, and flooring. The exterior ground level needs the patio replaced, the parking lot repaved, balcony windows brought to code, improved landscaping, and tenant recreational items.

**Riverview San Marco:** Riverview and San Marco have 101 and 30 units respectively, and one property management office in each building. The building transitioned to RAD in July of 2023. CMHA meets with residents on a monthly basis to provide updates and answer any questions. Relocation is in process for residents at Riverview and will begin moving residents at San Marco in spring of 2024. Construction will finish for both buildings in December of 2024.

This Plan sets forth policies and procedures, which will be necessary to conform to applicable statutes, regulations and guidance, including the RAD Notice (PIH Notice 2012-32), the RAD Relocation Notice (H 2014-09 PIH 2014-17), the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (“URA”) (46 U.S.C. § 4601 et seq.), including its implementing regulations (49 C.F.R. Part 24) and guidance found in HUD Handbook 1378; and the applicable Ohio Housing Finance Agency (OHFA) requirements governing relocation assistance for residential displacements.

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 the 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 \$11,250,000 towards the conversion.

The below table outlines the various RAD conversion transactions CMHA is undertaking or plans to undertake in the next several years. Please note that the details of each plan are subject to change as property needs and financing availability dictate. CMHA will abide by all applicable regulations regarding public notifications and resident outreach in its planning processes for each property.

CMHA has successfully converted 917 units to RAD and/or the RAD/Section 18 Blend program across several developments. These include Baldwin Grove, Sutter View, Evanston, Pinecrest, Park Eden, Horizon Hills and Marianna Terrace and Riverview San Marco. The LIHTC Compliance Period for City West recently expired, and, as a result, CMHA will be converting these units to RAD, RAD/Section 18 Blend or Section 18.

**CFFP Debt**

CMHA currently has debt under the Capital Fund Financing Program with a principal balance of \$2,315,452.58 at 12/31/2023. CMHA makes a monthly payment on this debt on an amortization schedule with a final payoff date of 10/1/2025. 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 981 units from public housing and therefore can remove approximately 200 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><u>Scattered Sites – 1-4 unit bldgs. on non-contiguous sites</u></b>	Pic Development ID:  <b><u>OH004-000201</u></b> <b><u>OH004-000202</u></b> <b><u>OH004-000203</u></b> <b><u>OH004-000204</u></b> <b><u>OH004-000205</u></b> <b><u>OH004-000206</u></b> <b><u>OH004-000207</u></b> <b><u>OH004-000208</u></b>	Conversion Type (i.e., PBV or PBRA):  <b><u>Section 18/Non-RAD PBVs</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>642</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>\$175,000</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	62	62	
Two Bedroom	215	215	
Three Bedroom	314	314	
Four Bedroom	38	38	
Five Bedroom	13	13	

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><u>Scattered Sites – 5+ unit bldgs. or contiguous groupings</u></b>	Pic Development ID:  <b><u>OH004-000201</u></b> <b><u>OH004-000202</u></b> <b><u>OH004-000203</u></b> <b><u>OH004-000204</u></b> <b><u>OH004-000205</u></b> <b><u>OH004-000206</u></b> <b><u>OH004-000207</u></b> <b><u>OH004-000208</u></b>	Conversion Type (i.e., PBV or PBRA):  <b><u>RAD PBRA or Section 18 Blend of RAD PBV/Non-RAD 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>569</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>\$175,000</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	3	3	
One Bedroom	158	158	
Two Bedroom	247	247	
Three Bedroom	116	116	
Four Bedroom	35	35	
Five Bedroom	8	8	
Six Bedroom	2	2	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) <u>N/A</u>		

**Development #3**

Name of Public Housing Development:  <b><u>Findlater Gardens</u></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>
Total Units:  <b><u>653</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>\$2,120,000</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: <b>Stanley Rowe and Liberty St. Apts.</b>	Pic Development ID: <b>OH004-000214</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>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>\$1,850,000</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) <b>N/A</b>		

**Development #5**

Name of Public Housing Development: <b>Maple Tower</b>	Pic Development ID: <b>OH004-000211</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>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>\$550,000</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) <b>N/A</b>		

**Development #6**

Name of Public Housing Development: <b>Beechwood</b>	Pic Development ID: <b>OH004-000211</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</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>\$625,000</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	Unit Reconfiguration
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 – PHASE I</b>	Pic Development ID: <b>OH004-000209</b>	Conversion Type (i.e., PBV or PBRA): <b>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>185</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>\$1,850,000</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	8	8	
Two Bedroom	90	90	
Three Bedroom	48	48	
Four Bedroom	37	37	
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>Winton Terrace – PHASES 2 and 3</b>	Pic Development ID: <b>OH004-000209</b>	Conversion Type (i.e., PBV or PBRA): <b>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>423</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>\$1,850,000</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	78	78	
Two Bedroom	184	184	
Three Bedroom	99	99	
Four Bedroom	62	62	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) <u>N/A</u>		

**Development #9**

Name of Public Housing Development: <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>\$1,550,000</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 #10**

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</b>	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): <b>N/A</b>
Total Units: <b>30</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>\$175,000</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 #11**

Name of Public Housing Development: <b>Riverview</b>	Pic Development ID: <b>OH004-000212</b>	Conversion Type (i.e., PBV or PBRA): <b>PBRA</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>\$575,000</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	Unit reconfiguration (studio to one-bedroom)
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 #12**

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>The Redding</b>	<b><u>OH004-000213</u></b>	<b><u>PBRA/Section 18 PBV</u></b>	<b><u>N/A</u></b>
Total Units:  <b><u>100</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>\$480,000</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	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) <b><u>N/A</u></b>		

**Development #13**

Name of Public Housing Development:  <b><u>Marquette Manor</u></b>	Pic Development ID:  <b><u>OH004-000218</u></b>	Conversion Type (i.e., PBV or PBRA):  <b><u>PBRA</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>140</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>\$575,000</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	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><u>N/A</u></b>		

**Development #14**

Name of Public Housing Development:  <b><u>The President</u></b>	Pic Development ID:  <b><u>OH004-000213</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>96</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>\$480,000</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	23	23	
One Bedroom	72	72	

Two Bedroom	1	1	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) <u>N/A</u>		

**Development #15**

Name of Public Housing Development:  <b><u>City West</u></b>	Pic Development ID:  <b><u>OH004000301</u></b> <b><u>OH004000302</u></b> <b><u>OH004000303</u></b> <b><u>OH004000304</u></b> <b><u>OH004000305</u></b> <b><u>OH004000306</u></b> <b><u>OH004000307</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>624 (334 ACC)</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>\$1,250,000</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	105	105	
Two Bedroom	294	294	
Three Bedroom	213	213	
Four Bedroom	12	12	
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><u>Scattered Sites – RACE STREET</u></b>	Pic Development ID:  <b><u>OH004-000201</u></b>	Conversion Type (i.e., PBV or PBRA):  <b><u>RAD PBV (4 units)</u></b> <b><u>Section 19 PBV (19 units)</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>28</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>\$980,000</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	6	4	Converted to first floor retail units
Two Bedroom	10	9	Converted to first floor retail units
Three Bedroom	12	10	Converted to first floor retail units
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>		

**RESIDENT RIGHTS, PARTICIPATION, WAITING LIST AND GRIEVANCE PROCEDURES UNDER RAD (Attachment)**

**RAD Fair Housing and Civil Rights and Relocation Notice:**

CMHA will strictly adhere to fair housing and civil rights statutory and regulatory requirements set forth in the RAD Tenant Protections Notice H 2016-17;PIH 2016-17. The notice provides PHAs and Project Owners with guidance relating to planning and implementing public housing conversions in a manner consistent with existing fair housing and other civil rights requirements, including, but not limited to, those associated with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, Titles II and III of the Americans with Disabilities Act, the Architectural Barriers Act of 1968, and their implementing regulations. The key principles of program implementation are:

**Key Principles of Implementation:**

- Affirmatively Furthering Fair Housing
- Nondiscriminatory Site Selection
- Meaningful Access for Persons with Limited English Proficiency (LEP)
- Effective Communication for Persons with Disabilities
- Accessible Meeting Facilities for Persons with Disabilities
- Accessibility for Persons with Disabilities Throughout the Planning and Implementation Process
- Reasonable Accommodations in Rules, Policies, Practices and Services
- Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility

**Conversions to PBV:**

**1. No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.<sup>36</sup> Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). 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, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.

**2. Right to Return.** See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident’s right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

**3. Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant’s TTP) would increase the tenant’s TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of “total tenant payment” (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section “Calculated PBV TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

**Three Year Phase-in:**

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBVTTP 37

**Five Year Phase in:**

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

*Please Note:* In either the three-year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

**4. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.**

Public Housing residents that are currently FSS participants will continue to participate in the PHA’s FSS program.

The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY 14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984 (current, or as amended), the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.38 Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at <http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf>.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

**5. Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

**6. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

a. **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 and to non-RAD PBV units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:

- i. A reasonable period of time, but not to exceed 30 days:
  1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
  2. In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. Not less than 14 days in the case of nonpayment of rent; and
- iii. Not less than 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.

b. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),<sup>40</sup> an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).

2. For any additional hearings required under RAD, the Project Owner will perform the hearing.

ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.

iii. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).

iv. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

**7. 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 after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

**8. Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

**9. When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. During any period when the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.<sup>41</sup> In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR § 983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

**10. Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current



residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

#### **D. PBV: Other Miscellaneous Provisions**

**1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

**2. Ongoing PHA Board Review of Operating Budget.** The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project.

**3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** These sections have been moved to [1.4.A.13](#) and [1.4.A.14](#).

**4. Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV programwide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

- a. Transferring an existing site-based waiting list to a new site-based waiting list.
- b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
- c. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
- d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list. If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing communitywide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

**5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

**6. Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.

**7. Administrative Fees for Public Housing Conversions During the Year of Conversion.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the "year of conversion"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

PHAs operating an HCV program typically receive administrative fees for units under a HAP Contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Work Responsibility

Act of 1998” and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion.

After the year of conversion, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

**8. Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA’s HCV program becomes PBV assistance, it is possible for most or all of a PHA’s turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA’s authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA’s administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

**9. Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.

**10. Initial Certifications and Tenant Rent Calculations.** The Contract Administrator uses the family’s public housing tenant rent (reflected on line 10f of the family’s most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family’s first regular or interim recertification following the date of conversion. At the earlier of the family’s first regular or interim recertification, the Contract Administrator will use the family’s TTP based on the recertification and the HCV utility allowance (or the PBV site-specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

### **Conversions to PBRA:**

1. No Rescreening of Tenants upon Conversion. Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.<sup>51</sup> Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBRA requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). 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, the first clause of section 8(c)(4) of the Act and 24 CFR § 880.603(b), concerning determination of eligibility and selection of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR § 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.

2. Right to Return. See section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident’s right to return.

3. Phase-in of Tenant Rent Increases. If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBRA program (the tenant’s TTP) would increase the tenant’s TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. Eligibility for the phase-in is to be determined at the Initial Certification which occurs at the time the household is converted to PBRA. A phase-in must not be applied after the household’s Initial Certification. To implement the phase-in, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 880.201 (definition of “total tenant payment” (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years, or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section “Calculated Multifamily TTP” refers to the TTP calculated in accordance with regulations at 24 CFR § 5.628 (not capped at Gross Rent) and the “most recently paid TTP” refers to the TTP recorded on the family’s most recent HUD Form 50059. If a family in a project converting from Public Housing to PBRA was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below. T

Three Year Phase-in: • Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated Multifamily TTP • Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) in prior to Year 3 AR – 50% of difference between most recently paid TTP and Calculated Multifamily TTP • Year 3: Year 3 AR and all subsequent recertifications – Year 3 AR and any IR in Year 3: Full Calculated Multifamily TTP53

Five Year Phase-in • Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated Multifamily TTP • Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and Calculated Multifamily TTP • Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and Calculated Multifamily TTP • Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and Calculated Multifamily TTP • Year 5 AR and all subsequent recertifications – Full Calculated Multifamily TTP

Please Note: In either the three-year phase-in or the five-year phase-in, once Calculated Multifamily TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full Calculated Multifamily TTP from that point forward

4. Family Self-Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program once their housing is converted under RAD. Through waiver in this Notice, FSS grant funds may be used to continue to serve such FSS participants. All Project Owners will be required to administer the FSS program or partner with another agency to administer the FSS program in accordance with the requirements of 24 CFR part 984, the participants' contracts of participation, and current and future guidance published by HUD for all FSS participants enrolled in the FSS program prior to RAD conversion. All Project Owners will be required to provide both service coordination and payments to escrow until the end of the Contract of Participation for each resident. To ensure that HAP payments are processed correctly, and until TRACS is modified, the Project Owner must notify MF\_FSS@hud.gov that there are current FSS participants residing in the Covered Project and adhere to the escrow and reporting requirements in Notice H 2016-08. The Project Owner may enter into a Cooperative Agreement with the PHA (the grantee), allowing the PHA to continue to provide service coordination to RAD-affected PBRA participants until all have completed their Contracts according to 24 CFR § 984.303. The Project Owner must assume responsibility for the administrative duties associated with FSS such as calculating and crediting escrow and reporting. Ultimately, the new Project Owner is responsible for serving the RAD-affected FSS participants until the end of their CoPs.

The owner is not required to enroll new participants, but may choose to run its own voluntary FSS program in accordance with Notice H 2016-08. At the completion of the FSS grant, grantees should follow the normal closeout procedures outlined in the grant agreement. Future FSS NOFAs will identify eligible FSS participants. Until HUD implements provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act that expand eligibility for FSS to PBRA properties, only a PHA that continues to run an FSS program that serves public housing and/or HCV/PBV FSS participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve public housing, HCV and/or RAD-affected PBRA FSS participants. However, if the PHA no longer has a public housing or HCV program, the PHA is not eligible to apply for FSS funding. Upon conversion, if the PHA has closed out its public housing program in accordance with Notice PIH 2019-13, funds escrowed under the public housing program for FSS participants shall be transferred into the PBRA escrow account and be considered PBRA funds, thus reverting to PBRA if forfeited by the FSS participant. Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants nor will its residents be eligible to be served by future ROSS-SC grants, as ROSS-SC, by statute, can serve only public housing residents. At the completion of the ROSS-SC grant, grantees should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be non-profits or local Resident Associations and this consequence of a RAD conversion may impact those entities.

5. Resident Participation and Funding. Residents of Covered Projects with assistance converted to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR part 245 (Tenant Participation in Multifamily Housing Projects). In addition, in accordance with Attachment 1B, residents will be eligible for resident participation funding.

6. Resident Procedural Rights. The information provided below must be included as part of the House Rules for the associated project and the House Rules must be submitted to HUD for review prior to Closing. See Attachment 1E for a sample Addendum to the House Rules.

a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects converting assistance under RAD, that supplement notification requirements in regulations at 24 CFR § 880.607 and the Multifamily HUD Model Lease. i. Termination of Tenancy and Assistance. The termination procedure for RAD conversions to PBRA will additionally require that Project Owners provide adequate written notice of termination of the lease which shall be: 1. A reasonable period of time, but not to exceed 30 days; o If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; and o In the event of any drug-related or violent criminal activity or any felony conviction; 2. Not less than 14 days in the case of nonpayment of rent; and 3. Not less than 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. ii. Termination of Assistance. In all other cases, the requirements at 24 CFR § 880.603, the Multifamily HUD Model Lease, and any other HUD multifamily administrative guidance shall apply.

b. Grievance Process. Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act. 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 requires that: i. Residents be provided with notice of the specific grounds of the Project Owner's proposed adverse action, as well as their right to an informal hearing with the Project Owner; ii. Residents have an opportunity for an informal hearing with an impartial member of the Project Owner's staff within a reasonable period of time; iii. Residents 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 Project Owner as the basis for the adverse action. With reasonable notice to the Project Owner, prior to hearing and at the residents' own cost, residents may copy any documents or records related to the proposed adverse action; and iv. Project Owners provide the resident with a written decision within a reasonable period of time stating the grounds for the adverse action and the evidence the Project Owner relied on as the basis for the adverse action. The Project Owner shall be bound by decisions from these hearings, except if (x) the hearing concerns a matter that exceeds the authority of the impartial party conducting the hearing, or (y) the decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law. If the Project Owner determines that it is not bound by a hearing decision, the Project Owner must promptly notify the resident of this determination, and of the reasons for the determination. c. Family Right to Move. Pursuant to Section 1.7.C.5 and unless the Covered Project received a specific good cause exemption to such provision, families have a choice-mobility right which must be stated in the House Rules as shown in sample in Attachment 1E.

7. 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, as described in Section 1.7.B.3; instead, the rent will automatically be adjusted to the appropriate rent level based upon tenant income at that time.

8. Jobs Plus. Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target project(s) under RAD will be able to finish out their Jobs Plus grant unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the

9. When Total Tenant Payment Exceeds Gross Rent. Under the PBRA program, assisted families typically pay 30% of adjusted gross income toward rent and utilities, referred to as TTP. Under normal PBRA rules, a Project Owner must process a termination of assistance pursuant to section 8-5 C. of Housing Handbook 4350.3, REV-1 when the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent). In addition, section 8-6 A.1 provides that, when terminating a tenant's assistance, the owner is to increase the tenant rent to the contract rent (assuming that the tenant does not receive the benefit of any other type of subsidy).

For residents living in the Converting Project on the date of conversion and all new admissions to the Covered Project thereafter, when TTP equals or exceeds the contract rent plus any utility allowance, the Project Owner must charge a tenant rent equal to the lesser of (a) TTP (which is not capped at gross rent), less the utility allowance in the contract, or (b) any applicable maximum rent allowable under LIHTC regulations.<sup>54</sup> To this end, HUD is waiving sections 8-5 C. and 8-6 A. 1. of Housing Handbook 4350.3, REV-1. In such cases, the tenant will still be considered a Section 8 tenant and will still have the rights and be subject to the requirements of Section 8 tenants. Tenants will retain all of the rights under the Model Lease, including the right to occupy the unit, as well as those provided through this Notice, and tenants will still be subject to the requirements for Section 8 tenants, including the requirements concerning reexamination of family income and composition found in 24 CFR §§ 5.657 and 880.603(c). When TTP equals or exceeds Gross Rent, the excess rent collected by the owner is considered project funds and must be used for project purposes. Assistance may subsequently be reinstated if the Tenant becomes eligible for assistance. In the event that the tenant moves out, the Project Owner must select an applicant from the waiting list who meets the applicable income limits for the project. The Project Owner is not required to process these individuals through Multifamily Housing's Tenant Rental Assistance Certification System (TRACS) but may be required to do so in the future when a future revision of the TRACS can accept such certifications. All normal actions for the contract rent shall continue for these units, including application of the OCAF adjustment to the contract rent indicated in the HAP Contract—since the OCAF adjusted rent will still be in effect whenever the unit is occupied by a family eligible for rental assistance.

10. Under-Occupied Units. If at the time of conversion, an eligible family assisted under the HAP Contract is occupying a unit that is larger than appropriate because of the family's composition, the family may remain in the unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized within a reasonable period of time. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, HUD is waiving the portion of 24 CFR § 880.605 that assumes the unit has become under-occupied as the result of a change in family size.

#### **1.7B: PBRA: Other Miscellaneous Provisions**

1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.

2. Davis-Bacon prevailing wages and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). These sections have been moved to 1.4.A.13 and 1.4.A.14.

3. Establishment of Waiting List. The Project Owner can utilize a project-specific or community waiting list. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including: a. Transferring an existing site-based waiting list to a new site-based waiting list. b. Transferring an existing site-based waiting list to a PBRA program-wide waiting list. c. Transferring an existing community-wide public housing waiting list to a PBRA program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD. d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

To the extent the wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing communitywide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).<sup>55</sup>

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This allows for easier moves between assisted properties. Any such preference must be approved by HUD in accordance with Notice H 2013-21, prior to implementation.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 880.603 regarding selection and admission of assisted tenants. However, after the initial waiting list has been established, the Project Owner shall administer its waiting list for the Covered Project in accordance with 24 CFR § 880.603.

A Project Owner must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

4. Mandatory Insurance Coverage. The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project.

5. Choice-Mobility. HUD seeks to provide all residents of Covered Projects with viable Choice-Mobility options. Unless provided an exemption as described below, PHAs that are applying to convert the assistance of a project to PBRA are required to provide a Choice-Mobility option to residents of Covered Projects in accordance with the following:<sup>56</sup> a. Resident Eligibility. Residents have a right to move with tenant-based rental assistance (e.g., Housing Choice Voucher (HCV)) the later of: (a) 24 months from date of effective date of the HAP or (b) 24 months after the move-in date. b. Voucher Inventory Turnover Cap. Recognizing the limitation on the availability of turnover vouchers from year to year, a voucher agency would not be required, in any year, to provide more than one-third of its turnover vouchers to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. c. Project Turnover Cap. Also recognizing the limited availability of turnover vouchers and the importance of managing turnover in the best interests of the property, in any year, a Project Owner and voucher agency may agree to limit the number of Choice-Mobility moves exercised by eligible households to 15 percent of the assisted units in the project. (For example, if the project has 100 assisted units, the Project Owner and voucher agency could limit the number of families exercising Choice Mobility to 15 in any year, but not to less than 15.) While a Project Owner and voucher agency are not required to establish a project turnover cap, if such a cap is implemented the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received.

The voucher agency must maintain a written agreement with the owner describing how the Choice-Mobility option will be administered in accordance with these requirements and the process by which households may request a voucher. For example, the written agreement must specify whether the owner will receive requests from families or refer families to the PHA.

HUD's goal is to have all residents in the Demonstration offered a Choice-Mobility option within a reasonable time after conversion. However, as HUD recognizes that not all voucher agencies will have vouchers sufficient to support this effort, HUD will take the following actions: • Provide voucher agencies that make such a commitment bonus points provided under the Section Eight Management Assessment Program (SEMAP) for deconcentration.<sup>57</sup> • Grant a good-cause exemption from the Choice-Mobility requirement for no more than 10 percent of units in the Demonstration. HUD will consider requests for good-cause exemptions only from the following types of PHAs: o Public housing-only agencies, defined as agencies that own units under a public housing ACC, but do not administer, directly or through an affiliate, a Housing Choice Voucher program with non-special-purpose vouchers; or o Combined agencies that currently have more than one-third of their turnover vouchers set aside for veterans, as defined for the purpose of HUD-VASH, or homeless populations, as defined in 24 CFR § 91.5.58 To be eligible for this exemption, the PHA's admission policies must have been formally approved by the PHA's board prior to the time of application.

6. Future Refinancing. Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC, but HUD review of liens must be performed prior to execution.

7. Submission of Year-End Financial Statements. Projects converting assistance to PBRA must comply with 24 CFR part 5, subpart H, as amended, revised, or modified by HUD.<sup>59</sup>

8. Classification of Converting Projects as Pre-1981 Act Projects under Section 16(c) of the United States Housing Act of 1937. For purposes of ensuring maximum flexibility in converting to PBRA, all projects converting to PBRA shall be treated as Pre-1981 Act Projects under Section 16(c) of the Act. Section 16(c)(1), which applies to pre-1981 Act projects, restricts occupancy by families that are other than very low income to 25% of overall occupancy. Thus, Project Owners of projects converting to PBRA may admit applicants with incomes up to the low-income limit. HUD Headquarters tracks the 25% restriction on a nationwide basis. Project Owners of projects converting to PBRA do not need to request an exception to admit low-income families. In order to implement this provision, HUD is specifying alternative requirements for section 16(c)(2) of the Act and 24 CFR § 5.653(d)(2) to require Project Owners of projects converting to PBRA to adhere to the requirements of section 16(c)(1) of the Act and 24 CFR § 5.653(d)(1).

9. Owner-Adopted Preferences. Covered Projects are not permitted to establish or, where previously approved under public housing rules, maintain a designation (i.e., a set-aside of units) for elderly families or for disabled families; unlike the statute governing public housing, the Section 8 statute does not authorize designations. However, owners of Covered Projects may adopt a selection preference (e.g., for elderly individuals and/or elderly families) which permits those applicants to be selected from the waiting list and housed before other eligible families. Project Owners who wish to adopt a preference for populations that are not identified in 24 CFR § 5.655(c)(5) (e.g., elderly families, near-elderly single persons, near-elderly families), must obtain HUD approval from the prospective Multifamily Housing Account Executive (field office) prior to execution of the HAP contract to do so in accordance with Notice H 2013-21 (July 25, 2013). This approval must be secured prior to conversion if the owner intends to implement the preference for new admissions immediately following conversion.

10. Initial Certifications and Tenant Rent Calculations. Owners are to use the resident's pre-existing public housing 50058 data and maintain the tenant rent and utility allowance until the resident's next annual or interim certification. To effectuate this provision, HUD is waiving 24 CFR 5.601.

**Significant Amendment Definition:**

As part of the Rental Assistance Demonstration (RAD), the Cincinnati Metropolitan Housing Authority, is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance; b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and d. Changes to the financing structure for each approved RAD conversion.
- d. Changes to the financing structure for each approved RAD conversion.

**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
- HUD FHA Loans
- Conventional Loans
- American Rescue Plan Act (ARPA)
- Green Resilience and Retrofitting Program (GRRP)
- HUD Section 108 Loan
- Inflation Reduction Act Funding (IRA)
- Economic Development Initiative Grants (EDI or CPF)
- CMHA Sales Tax Exemption
- 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 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	4/24	23 Units	Partial	4/24-4/25	CMHA does not plan to

									reduce its housing unit count
201	122 & 130 McMicken Ave	OH004-40	Dispo	Planned	4/24	5 Units	Partial	4/23-4/24	CMHA does not plan to reduce its housing unit count
208	415-437 Rockdale	OH004-40	Demo/Dispo	Planned	7/24	12 Units	Partial	8/24-8/25	CMHA does not plan to reduce its housing unit count
201	4048 Ledgewood	OH004-39	Dispo	Planned	7/24	12 Units	Partial	8/24-8/25	CMHA does not plan to reduce its housing unit count
208	415-417 Catherine	OH004-23	Demo/Dispo	Planned	7/24	4 Units	Partial	10/24-10/25	CMHA does not plan to reduce its housing unit count
208	418 Kasota	OH004-40	Demo/Dispo	Planned	7/24	7 Units	Partial	10/24-10/25	CMHA does not plan to reduce its housing unit count
211	3460 Hallwood Lane	OH004-19	Dispo	Planned	4/24	Land Only	Partial	4/24-4/24	
218	1999 Sutter (Marquette)	OH004-11	Demo/Dispo	Planned	10/24	140 Units	Partial	10/24-10/25	CMHA does not plan to reduce its housing unit count
218	English Woods Land	OH004-04	Dispo	Planned	4/24	Land Only	Total	10/24-10/25	
	Laurel Homes	City West	Dispo	Amend approved	2/24	Land Only	Partial	4/24-4/27	
205	Grandview/Considine	OH004-39	Dispo	Planned	10/24	Land Only	Partial	1/24—8/24	
207	211 E. Broadway	OH004-58	Dispo	Planned	4/24	Land Only	Partial	4/24-4/25	
	7 E. McMillian	OH004-40	Dispo	Submitted	12/22	Building and Land	Partial	01/23-06/24	
	1701-1705 Vinton		Dispo	Planned	12/23	2 units	Partial	6/24-6/25	

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	113	Dispo	Planned	2024-2025	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	2024-2025	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	2025-2025	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	2024-2025	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	2025-2025	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	90	Dispo	Planned	2024-2025	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	2024-2025	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	2024-2025	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 the developments below:

Development Name	Designation Type	Application Date	Approval Date	Number of units Affected
Cary Crossing	Disabled			8

CMHA plans to submit an elderly designation plan for West Union Square, Central YMCA and Logan Commons.

**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	20	Pending Submission	
AMP 202	Various Addresses	Scattered Sites	14	Pending Submission	



AMP 203	Various Addresses	Scattered Sites	15	Pending Submission	
AMP 204	Various Addresses	Scattered Sites	26	Pending Submission	
AMP 205	OH004-27	Quebec Gardens	40	Pending Submission	
AMP 205	Various Addresses	Scattered Sites	20	Pending Submission	
AMP 206	Various Addresses	Scattered Sites	15	Pending Submission	
AMP 207	Various Addresses	Scattered Sites	15	Pending Submission	
AMP 208	Various Address	Scattered Sites	16	Pending Submission	
AMP 208	OH004-29	Rion Lane	40	Pending Submission	
AMP 209	OH004-001	Winton Terrace	15	Pending Submission	
AMP 217	OH004-06	Millvale	16	Pending Submission	

**B.3**

**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. Continued Improvement of 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 service and quality products.
5. Continued implementation of RAD.
6. Transform owned/operated portfolio through financially 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.
9. Use local and universal funding tools such as; American Rescue Plan, National Trust Fund, Cincinnati Foundation, Cincinnati Development Fund, City of Cincinnati, Hamilton County, Debt and Equity Funding, Issue CMHA Bonds to further preserve and build additional affordable housing
10. Apply for Choice Implementation Grant to improve the properties and lives of residents in and around the Choice Neighborhood (target area) and increase wealth building for all families, specifically increase black owned businesses and home ownership.
11. Utilizing CNI improve and implement neighborhood strategies
12. Preserve affordable housing units in the West End, specifically CMHA properties
13. Work towards diversifying income streams for CMHA
14. Increase opportunities of affordable homeownership
15. Provide Wi-Fi where financially feasible to residents within developments.

**Annual Goals:**

1. 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. Continue to work towards improving resident's self-sufficiency through the EnVision centers
13. Increase broadband internet access throughout the agency for all residents
14. Review and update all lease agreements and house rules
15. Continue to preserve affordable housing throughout Hamilton County
16. Work toward strengthening relationships with the City of Cincinnati.
17. Work toward strengthening relationships with Hamilton County.
18. Strengthen partnerships with community groups
19. Continue to strengthen partnerships to preserve current housing and develop additional affordable housing throughout the community.
20. Complete a new agency Strategic Plan to use as a road map for the agency.
21. Increase resident owned business participation through our transformation plans
22. Increase MBE, WBE and Section 3 business participation

	<p>23. Develop criteria for preserving and developing current and new affordable housing</p> <p>24. Work toward garnering business, through providing education and guidance to other small non-profit organizations and public housing authorities to preserve and build affordable housing.</p> <p>25. Seek and utilize other sources of funding such as New Markets, Congressional EDI funding, etc....</p> <p><b><u>CMHA PROGRESS REPORT:</u></b></p> <p><b><u>In 2023 CMHA accomplished the following:</u></b></p> <ol style="list-style-type: none"> <li>1. Completed year four of the strategic plan</li> <li>2. Updated the ACOP</li> <li>3. CMHA achieved high performer status under SEMAP for the Housing Choice Voucher Program in 2023</li> <li>4. Completed transformation plan through Choice Neighborhoods Planning Grant</li> <li>5. Continued successful engagement of Section 3, MBE, WBE goals</li> <li>6. Completed the construction of – Bennett Point</li> <li>7. Broke ground on Logan Commons development</li> <li>8. Started the RAD conversion of Riverview/SanMarco</li> <li>9. Completed Renovations on Two RAD Conversions</li> <li>10. Utilized Historic Credits for the first time as funding source for renovation of public housing development through RAD program</li> <li>11. Received the Largest Family Self Sufficiency Grant in the State of Ohio</li> <li>12. Completed two Sherwin Williams Training Classes</li> <li>14. Distributed through our Book Enrichment Program over 10,000 Books</li> <li>15. Updated our Procurement Policy</li> <li>16. Updated our HCV Administrative Plan</li> <li>17. Updated agency wide Standard Operating Procedures</li> <li>18. Updated our Human Resources Policy</li> <li>19. Updated and implemented changes associated to Risk Management that covers all programs</li> <li>20. Updated and enhanced cyber security platforms and reestablished cyber insurance</li> <li>21. Hired a record number of MBE, WBE and Section 3 companies to complete day-to-day maintenance of operations, preserve, and develop affordable housing in Cincinnati and Hamilton County</li> </ol>
<p><b>B.4</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p><b>See HUD EPIC 50075.2 approved by HUD 4/7/23 CFP Five Year Action Plan 2023-2027</b></p>
<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>This statement is based on the results of the FY 2022 financial audit. The FY2023 financial audit has not been completed at this time.</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p style="text-align: center;"><b>ANNUAL PLAN COMMENTS FOR FY2024-2025 SUMMARY OF COMMENT TO PLAN AND CMHA RESPONSE</b></p> <p>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.</p> <div style="border: 1px solid black; text-align: center; padding: 5px; margin-top: 20px;">SUMMARY</div>

**COMMENT PERIOD RUNS FROM 01/19/24 -03/04/24  
THIS SECTION WILL BE UPDATED AFTER THE COMMENT PERIOD ENDS**

**C.2** **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.  
  
**This section is being reviewed by State and Local Officials**

**C.3** **Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.**  
*Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*, must be submitted by the PHA as an electronic attachment to the PHA Plan.  
  
**This section is being reviewed**

**C.4** **Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.  
  
(a) Did the public challenge any elements of the Plan?  
  
Y   N  
     
  
If yes, include Challenged Elements.

**C.5** **Troubled PHA.**  
(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  
Y   N   N/A  
        
  
(b) If yes, please describe:

**D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing (AFFH).**  
 Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

**Fair Housing Goal:**  
Describe fair housing strategies and actions to achieve the goal

**Improve Outreach and Marketing Materials:** CMHA will conduct outreach as needed to maintain an adequate application pool representative of the eligible population in the area. Outreach efforts will consider the level of vacancy in CMHA’s units, availability of units through turnover, and waiting list characteristics. CMHA will periodically assess these factors in order to determine the need for and scope of any marketing efforts. All marketing efforts will include outreach to those least likely to apply.

**Marketing and informational materials will be subject to the following:**

- a. Marketing materials will comply with Fair Housing Act requirements on wording, logo, size of type, etc.;
- b. Marketing will describe the housing units, application process, waiting list and preference structure accurately;
- c. Marketing will use clear and easy to understand terms and will use more than strictly English-language print media;
- d. Agencies that serve and advocate for potentially qualified applicants least likely to apply (e.g. the disabled) will be contacted to ensure that accessible/adaptable units are offered to applicants who need these features;
- e. Marketing materials will make clear who is eligible: low income individuals and families; working and non-working people; and people with both physical and mental disabilities; and
- f. CMHA will be clear about its responsibility to provide reasonable accommodations to people with disabilities.

**Fair Housing Goal:**  
Describe fair housing strategies and actions to achieve the goal

**AFFIRMATIVELY FURTHERING FAIR HOUSING**

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. CMHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Programs on the basis of race, color, sex, religion, creed, national or ethnic origin, age, to actual or perceived sexual orientation, gender identity, familial or marital status, handicap or disability.

To further its commitment to full compliance with applicable Civil Rights laws, CMHA will provide Federal/State/local information to Voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Voucher holder’s briefing packet and available upon request at the HCV reception desk.

All Housing Authority staff is kept informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families.

Affirmatively furthering fair housing includes providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Fair Housing posters are posted throughout the Housing Authority offices, including in the lobby and interview rooms and the equal opportunity logo is used on all outreach materials. Staff will attend local fair housing update training sponsored by HUD and other local organizations to keep current with new developments.

Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because CMHA’s facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout CMHA’s office in such a manner as to be easily readable from a wheelchair.

CMHA offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided by Cincinnati Bell by dialing 1-800-545-1833.

CMHA will take the following steps to ensure that the FSS program “Affirmatively Furthers Fair Housing:”

Advertise widely in the community for the coordinator position or positions by publicizing and disseminating information to make known the availability of the FSS Coordinator position. CMHA will advertise in a newspaper of general circulation, minority media, and by other suitable means.

Market the program to all eligible persons, including persons with disabilities and persons with limited English proficiency by:

Providing all annual recertification HCV participants with information about the HCV FSS program (description of the program and FSS Coordinator contact information).

For persons with limited English proficiency (LEP) the following will be considered:

Oral Translation

The Housing Authority, with sufficient advanced notice, will make arrangements to assist non-English speaking families and translate documents into other languages.

Translation of Documents

In determining whether it is feasible to provide translation of documents written in English into other languages, CMHA will consider the following factors:

The number of applicants and participants in the jurisdiction who do not speak English and speak the other language.

The estimated cost to CMHA per client of translation of English written documents into the other language.

The availability of local organizations to provide translation services to non-English speaking families.

The availability of bilingual staff to provide translation for non-English speaking families.

Make buildings and communications that facilitate applications and service delivery accessible to persons with disabilities:

Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because CMHA's facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout CMHA's office in such a manner as to be easily readable from a wheelchair.

CMHA offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided by Cincinnati Bell by dialing 1-800- 545-1833.

Provide fair housing counseling services or referrals to fair housing agencies to families needing this service.

Inform participants of how to file a fair housing complaint, and provide them with the toll-free number of the Housing Discrimination Hotline: 1-800- 669-9777

To further its commitment to full compliance with applicable Civil Rights laws, CMHA will provide Federal/State/local information to Voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session, during annual recertification on FSS information forms, on all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Voucher holder's briefing packet and available upon request at the HCV reception desk.

If the program has a goal of homeownership or housing mobility, recruiting landlords and service providers in areas that expand housing choice to program participants. Record keeping covers, but is not limited to, the race, ethnicity, familial status, and disability status of program participants by:

Listed below are normal outreach activities used to facilitate an understanding of CMHA's Housing Choice Voucher program by other entities in Hamilton County:

CMHA makes a concerted effort to keep private owners informed of legislative changes in the tenant-based program, which are designed to make the program more attractive to owners. This includes informing participant owners of applicable legislative changes in program requirements.

CMHA encourages owners of decent, safe and sanitary housing units to lease to Housing Choice Voucher Program families.

CMHA encourages participation by owners of suitable units located outside areas of high poverty or minority concentration.

CMHA conducts general meetings with participating owners to improve owner relations, increase program knowledge and recruit new owners.

CMHA maintains a list of interested owners and lists of units available for the Housing Choice Voucher Program and updates this list at least monthly. When listing requests from owners are received, they will be compiled by CMHA staff by bedroom size. CMHA reserves the right to pre-screen the property before listing it.

CMHA maintains lists of available housing submitted by owners in all neighborhoods within the Housing Authority's jurisdiction to ensure greater mobility and housing choice to very low-income households. The lists of owners/units will be provided in the lobby, mailed on request, maintained on the agency's Internet site and provided at briefings. CMHA is not responsible for the accuracy of the information on the available unit listing.

The staff of CMHA initiates personal contact with private property owners and managers by conducting formal and informal discussions and meetings.

Printed material is offered to acquaint owners and managers with the opportunities available under the program.

CMHA actively participates in a community-based organization(s) comprised of private property and apartment owners and managers.

CMHA actively recruits property owners with property located outside areas of minority and poverty concentration and apply for exception payment standards if CMHA determines it is necessary to make the program more accessible in CMHA's jurisdiction.

CMHA encourages program participation by owners of units located outside areas of poverty or minority concentration. CMHA periodically evaluates the demographic distribution of assisted families to identify areas within the jurisdiction where owner outreach should be targeted. The purpose of these activities is to provide more choice and better housing opportunities to families.

Voucher holders are informed of a broad range of areas where they may lease units inside CMHA's jurisdiction and are given a list of owners or other parties who are willing to lease units or help families who desire to live outside areas of poverty or minority concentration.

CMHA may work with an outside entity to counsel families on their prospective move and services available in the areas in which the family is interested, with the goal of increasing the number of voucher holders moving into low-poverty neighborhoods.

CMHA shall periodically:

Request the HUD Field Office to furnish a list of HUD-held properties available for rent.

Develop working relationships with owners' associations including Greater Cincinnati Northern Kentucky Apartment Association and Real Estate Investors Association.

Establish contact with civic, charitable and neighborhood organizations which have an interest in housing for low-income families and public agencies concerned with obtaining housing for displacements.

Explain the program, including equal opportunity requirements and nondiscrimination requirements, including Fair Housing Amendments Act of 1988 and Americans with Disabilities Act, to real estate agents, owners, and other groups that have dealings with low-income families or are interested in housing such families.

CMHA works with HUD-Approved Homeownership Counseling agencies that promote CMHACMHA Homeownership program to the community as well. These agencies' training curriculum emphasizes (but not limited to):

How to find a home, including information about home ownership opportunities, schools, and transportation in the CMHA jurisdiction;

Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;

How to negotiate the purchase price of a home

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	<b>Fair Housing Goal:</b>	
	<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>	