

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 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	PHA Name: <u>Cincinnati Metropolitan Housing Authority</u> PHA Code: <u>OH-004</u> PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>4435</u> Number of Housing Choice Vouchers (HCVs) <u>11,493</u> Total Combined Units/Vouchers <u>15,928</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission																										
.1	<p>Availability of Information. 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"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 30%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 15%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">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> </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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⁴ Applicant must be given the benefit of the working family preference if the head and spouse, or sole member is age 62 or older, or is a person with disabilities.

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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
- Deconcentration 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: PUBLIC HOUSING

Housing Needs of Families on the PHA's Waiting Lists

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

	# of families	% of total families	Annual Turnover
Waiting list total	15523		800
Extremely low income <=30% AMI	15363	98.96%	
Very low income (>30% but <=50% AMI)	217	1.09%	
Low income (>50% but <80% AMI)	33	0.019%	
Families with children	2935	18.90%	
Elderly families	1265	8.20%	
Families with Disabilities	2881	18.60%	
Race/ethnicity: White	2276	14.70%	
Race/ethnicity: Black	10986	79.80%	
Race/ethnicity: Native American	308	2.00%	
Race/ethnicity: Asian	265	1.70%	

Characteristics by Bedroom Size (Public Housing Only)			
1BR (Includes 21-0 BR)	11949	77.00%	
2 BR	3074	33.3%	
3 BR	1547	10.00%	
4 BR	75	0.5%	
5 BR	153	1.00%	
5+ BR	4	0.0%	

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

STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS: Section 8 Tenant-Based Assistance

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

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

	# of families	% of total families	Annual
Waiting list total	3709		12
Extremely low income <=30% AMI	3062	82.49%	
Very low income (>30% but <=50% AMI)	499	13.44%	
Low income (>50% but <80% AMI)	128	3.45%	
Families with children	894	24.1%	
Elderly families	46	1.2%	
Families with Disabilities	459	12.4%	
Race/ethnicity (White)	489	13.2%	
Race/ethnicity (Black)	3214	86.7%	
Race/ethnicity (Asian/Other)	106	2.9%	
Race/ethnicity (Hispanic)	26	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)? No Yes If yes:

How long has it been closed (of months)? January 2023 - (24 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

FINANCIAL RESOURCES:

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2023 grants)		
a) Public Housing Operating Fund	\$26,362,286.00	
b) Public Housing Capital Fund	\$ 14,550,667.00	
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$97,985,543.00	
d) Other Federal Grants (list below)	\$72,996.00	Choice Neighborhood Planning Grant
e) Family Self Sufficiency	\$447,506.00	Section 8 Supportive Services
f) NSP2		NSP2 development
2. Prior Year Federal Grants (unobligated funds only) (list below)		
a) Regional Opportunity Counseling	\$0	Section 8 Tenant Based Assistance
b) Family Self Sufficiency	\$0	Section 8 Supportive Services
c) Resident Opportunity and Self-sufficiency Grants	\$0	Public Housing Supportive Services
d) Capital	\$0	
e) HOPE VI Revitalization	\$0	
3. Public Housing Dwelling Rental Income		
a) Rental Income	\$10,052,023.00	Public Housing Operations
4. Other income (list below)		
a) Excess Utilities	\$0	Public Housing Operations

b) Non-dwelling Rental		
c) Interest & Other Income	\$5,814,321.00	
5. Non-federal sources (list below)		
Total resources	\$155,285,342.00	

RENT DETERMINATION:

FY 2025 FLAT RENT SCHEDULE

EFFICIENCY	1 BEDROOM	2 BEDROOMS	3 BEDROOMS	4 BEDROOMS	5 BEDROOMS
\$706	\$794	\$1,030	\$1,366	\$1,508	\$1,734

OPERATIONS AND MANAGEMENT:

SUMMARY OF PROPOSED CHANGES TO CMHA HCV ADMINISTRATIVE PLAN

HOUSING CHOICE VOUCHER [HCV] PROGRAM

The Housing Choice Voucher Program is no proposing any changes to the Housing Choice Vouchers (HCV) Administrative Plan

SUMMARY OF PROPOSED CHANGES TO CMHA ADMISSIONS AND CONTINUED OCCUPANCY POLICY

ASSET MANAGEMENT ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)

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

The new language is indicated in red. Deleted language is shown as strikeout.

- **Language update to be consistent with verification requirements at admissions.**
 - B. Qualification for Admission
 - d. **Meet net asset and property ownership restrictions requirements;**
 - C. Waiting List Management
 - 2. Opening and Closing Waiting Lists
 - a. Decisions about closing the authority-wide based on the number of applications available for a particular size and type of unit, and the ability of CMHA to house an applicant in an appropriate unit within a reasonable period of time (between twelve and eighteen months). A decision to close the waiting lists, restricting intake, or opening the waiting lists will be publicly announced.
- **Added additional contact methods for applicants, detailed information as it pertains to returned postage and removal from the waitlist.**
 - 1. Updating the Waiting List

CMHA will update each waiting list at least once a year by contacting all applicants in writing¹ via first class mail or via electronic transmission (ex. email or portal access) This update request will be sent to the last address or email that the PHA has on record for the family as well as any additional contact methods identified by the family. If, after one²written attempt³ no response is received

1. Applicants with disabilities may be contacted by an alternate method as requested.

2.

3. Written communications will be sent by first class mail.

within 30 days, or if mail is returned without a forwarding address, CMHA will withdraw the names of applicants from the waiting list. If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If an applicant is ineligible, the Eligibility Department will send a letter to the applicant declining placement on the waiting list and the grounds for that denial. Applicants whose applications have been rejected may request an informal hearing.

- **Update to reflect Agency Wide waitlist, Language update to acknowledge conversion of properties.**

F. Local Preferences and Unit Selection

1. **Local Preference and Points Allocation:** The local preferences in effect are as follows:

Preference	Points
Victims of involuntary displacement by government agency or natural disaster – These individuals will supersede the point system and move to the top of the waiting list due to the exigent situation.	42 Points
HCV Abatement-Affected Family Preference	
These will also include individuals who are participants in the Housing Choice Voucher Program that move from their HCV subsidized unit/HCV participant due to the unit's failed HQS and/or abatement from the program and	
Conversion of Properties - individuals who are in RAD converting projects (e.g. RAD, Section 18, PBV) and must move due to unit rehabilitation/ demolition.	
Victims of domestic violence - referral from YWCA, Women Helping Women, or Third-Party Social Service Agency	9 Points
Victims of domestic violence – Self certification only	4 Points
Referral from Local Homeless Partners or Third-Party Certification	4 Points
Veteran preference	9 Points
Full-time students (Head/Co-Head of Household with 3rd party verification from the school)	3 Points
Disabled Families or Elderly	3 Points
Family Unification (see below/to be defined)	2 Points
Good Neighbor Program Completion	2 Points
Youths aging out of foster care who are between the ages of 18 to 24.	2 Points
Working Families (head, spouse, or sole member is employed)⁴	3 Points

3. **Definitions of Preferences:**

- a. **Conversion of Property** Individuals who are/were living within a Converting Project at the time of the conversion and must now be temporarily relocated due to the rehabilitation/demolition of the property.
- b. **HCV Abatement-Affected Family Preference:** The PHA will provide a preference for an HCV family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.

4. Method of Applying Preferences

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

Families are selected from the Agency Wide waiting list based upon HUD-required preference points.

Among applicants on the Agency Wide waiting list with the same preferences, families are selected on a first-come, first-served basis according to the time and date of their completed application.

When selecting applicants from the waiting list, CMHA matches the characteristics of the available unit (size, accessibility) to the applicants on the waiting list. CMHA offers the unit to the highest-ranking applicant who qualifies for that unit size.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status. (For example, if only two-bedroom units were available and a family needing a 4-bedroom unit is next on the waiting list. The family needing the 4-bedroom unit will be passed over until an appropriately sized unit is available.)

- **Updated to reflect change in the position responsible for meeting with applicants regarding qualification for preferences.**

8. Notice and Opportunity for Manager.

4. Applicant must be given the benefit of the working family preference if the head and spouse, or sole member is age 62 or older, or is a person with disabilities.

Asset Management Services Meeting

- **If an applicant claims but does not qualify for a preference, CMHA will provide the applicant with a letter containing a brief statement of the reason(s) for the determination and that the applicant may request a meeting with the Asset Management Services Manager.**

If the applicant requests the meeting, the Asset Management Services Manager will meet with the applicant and a written summary of this meeting shall be retained in the applicant's file.

At the Asset Management Services Manager meeting, the applicant will be advised that they may exercise other rights if the applicant believes that illegal discrimination has contributed to CMHA's decision to deny the preference.

- **Updated department responsible for receiving applicant information regarding changes to income and family composition.**

Section III - Tenant Selection and Assignment Plan

B. Unit Offers to Applicants

7. It is the responsibility of the applicant to keep CMHA aware of any changes to their income or family composition. If the applicant is offered a unit and there have been changes to their information, the applicant will have 2 working days to submit their information to the Eligibility Department for verification or CMHA will offer the unit to the next applicant. Failure to update the information within the required period will result in the applicant's removal from the waiting list.

- **Updated policy to allow for more precise definition and understanding of relocation transfers to include, response time, additional housing programs, corrected bedroom sizing, offers and timeline to respond, Good Standing details. In addition, category designation, responsibility of submission of supporting documentation, offers and removal of the waitlist.**

Section V - Transfer Policy

A. General Transfer Policy

1. When housing residents for a transfer, CMHA matches the characteristics of the available unit (size, accessibility) to the resident on the wait list. In the event there are no suitable units, the Relocation Department will assess availability within the parameters of the family household composition to determine if alternative housing opportunities can be provided. This may **include but not limited** to referral to Housing Choice Voucher, Touchstone Property Services, or other Affordable Housing, CMHA hoteling unit, temporarily over-housing, or family and friends stays. send a referral to the Housing Choice Voucher Program for a voucher. Referrals may be made in the following circumstances:

- Displaced preference for Asset Management/LIPH families in a hard to house situation
- Conversions of AMP/LIPH unit or due to demo/disposition or additional extension of platforms within the Asset Management program.
- When a family or individual cannot be housed because of extenuating circumstances
- Temporary and/or Permanent Relocation assistance from Asset Management Services, RAD or Non-RAD, Section 18 units.

2. **The good cause standard applicable to transfers is as follows:**

- **If resident is willing to accept the unit offered but is unable to move at the time of the offer is made, and presents to the satisfaction of CMHA, clear evidence ("good cause") that acceptance of the offer will result in undue hardship not related to considerations of any protected category, the resident will not be removed from the waiting list.**

A. Examples of "good cause" for refusing an offer of housing include, but are not limited to:

1. **If a tenant refuses a transfer based on alleged discrimination based on a protected category having occurred at a property. Supporting documentation submitted for further review and determination within 1 business day.**

Section V - Transfer Policy

- **Types of Transfers**

This policy sets forth the transfer categories.

- **Emergency Transfer – 1 – Unit Conditions**
- **Emergency Transfer – 2 – Domestic Violence – VAWA**
- **Category 1 – Reasonable Accommodation**
- **Category 2 – Correct Serious Occupancy**
- **Category 3 – Occupancy – Correct/Avoid Concentration,**
- **Occupancy Standard – Voluntarily if family is between larger/small sizing of unit**

Priority for transfer, and the order in which families are transferred, shall be subject to the hierarchy, by category, set forth below.

1. Emergency Transfer (1) is mandatory and shall take priority over new admissions. When the unit or building conditions poses an immediate threat to resident life, health or safety, as determined by CMHA, an emergency transfer will be required. Emergency transfers within sites or between sites may be made to permit repair of unit defects hazardous to life, health, or safety; or to alleviate verified disability problems of a life-threatening nature.

- a. Resident will receive one transfer offer, household composition and unit size will be corrected as needed, at the transfer offer. The transfer offer will be determined by the first available unit that is ready for move-in at the resident's current location. In the absence of available units at that site, the offer will be based on the first vacant unit that is ready for move-in within the public housing program.

- b. Refusal of the transfer offer, without good cause, will result in lease termination and referred to the property manager.
- c. Resident is responsible for submitting supporting documentation, within 24 hours, as it pertains to the refusal of the transfer offer due to extenuating circumstances. After review of supporting information, if a resident is granted an additional unit offer, the resident will remain active on the waitlist.

2. Emergency Transfer (2) Shall take priority of new admissions. They include mandatory transfers to: provide housing options to residents who are victims of federal hate crimes⁵ or extreme harassment; *or to witnesses of crimes,⁶ or to victims of domestic violence, dating violence, stalking, or sexual assault⁷*, or to alleviate verified disability problems of a serious (but not life-threatening) nature; permit portfolio conversion, modernization or demolition of units or to permit a family that requires a unit with accessible features to occupy such a unit.

- a. Residents will receive one transfer offer, household composition and unit size will be corrected as needed, at the time of the transfer offer. The transfer offer will be determined by the first available unit that is ready for move-in at the resident's current location. In the absence of available units at that site, the offer will be based on the first vacant unit that is ready for move-in within the public housing program.
- b. Refusal of the transfer offer, without good cause, may result in the removal of the household from the transfer list for voluntary transfers, or lease termination in the case of a mandatory transfer.
- a. Good cause – resident is responsible for submitting supporting documentation, within 1 business day, as it pertains to the refusal of the transfer offer due to extenuating circumstances. After review of supporting information, if a resident is granted an additional offer, the resident will remain active on the waitlist and offered the next available unit.

3. Category 1 – Reasonable Accommodations are voluntary and shall take priority over new admissions. Requests for these transfers will be sent to the location designated by CMHA. The resident shall provide the necessary documentation to support the need for such a transfer. Transfers may also be initiated by CMHA (e.g. moving a person with mobility problems to a unit with accessible features).

4. Category 2 - Administrative Transfers are mandatory transfers within or between sites to correct serious occupancy standard problems (over or under CMHA's standards) as described below.

- a. Residents will receive one transfer offer; household composition and unit size will be corrected as needed at the transfer offer.
- b. Refusal of the transfer offer, without good cause, will result in lease termination and referred to the property manager.

5. Category 3 - Administrative Transfers to correct occupancy standards will only be made if the family size is so small that it includes fewer persons than the number of bedrooms, or so large that the household members over age 3 would equal more than two persons per bedroom or family request a transfer to permit older children of the opposite sex to have separate bedrooms. These transfers are voluntary. Approval of Category 3 transfers will only be reviewed at the time Resident's annual recertification.

- a. Residents will receive one transfer offer. Refusal of the offer, without good cause, will result in the removal of the household from the transfer list for voluntary transfers, or lease termination in the case of a mandatory transfer.
- b. Category 3 Administration transfers will not take priority over new admissions. They will be processed at the rate of one transfer to four admissions.
- c. Whenever possible, Resident transfers will be made within the site of their current occupancy.

B. Processing Transfers

1. The Relocation Department will receive approved transfers via email from Asset Management, and/or the 504 Coordinator. Transfers will be sorted into their appropriate category and added to the proper waitlist. . Transfers will be made in the following order:

- a. Emergency (1) transfers (caused by conditions that make the unit uninhabitable);
- b. Emergency (2) (deemed an emergency due to the resident's need for housing options as defined in this section- VAWA.)
- c. Category 1 – Reasonable Accommodation
- d. Category 3 and 4 - Occupancy

Within each category, transfer applications will be sorted by the date the completed file (including any verification needed) is received from the Asset Management team or 504 Coordinator.

5. Following consultation with Housing Opportunity Made Equal that such a transfer is appropriate.

6. Following consultation with and upon recommendation of the local prosecutor that such a transfer is appropriate and recommended.

7. The individual seeking the transfer may provide supportive referrals from a third-party social service agency, the local prosecutor or law enforcement. The procedure for a VAWA emergency transfer is outlined in the Emergency Transfer VAWA Plan, which is an addendum to this ACOP.

- **Added details for covered relocation expense if paid by CMHA**

C. Tenant Qualifications Required for Transfers

1. In general, and in all cases of resident-requested transfers (**voluntary**), residents will be considered for transfers only if the head of household, any other family members or sponsored guests:
 - a. are not under eviction for any reason (Received 3 Day Notice to Leave Premises)

COST OF TRANSFERS

1. CMHA will pay for the cost of a transfer when a resident is required to move as a result of the approval of demolition, modernization of their unit, or in the case of some emergency transfers. The resident shall bear the cost associated with any other type of transfer. CMHA will review the circumstances surrounding the need of the transfer and make a final determination if the move will be a covered expense by CMHA.
2. If the expense of the move is covered, the following options will be provided:
 - d. Contracted Mover or;
 - e. Resident Self Move
 - i. 1 bedroom family/scattered sites - \$850
 - ii. 1 bedroom hi-rise - \$700
 - iii. 2 bedroom family/scattered sites - \$1000
 - iv. 2 bedroom hi-rise - \$850
 - v. 3 bedroom family/scattered sites - \$1100
 - vi. 4 bedroom family/scattered sites - \$1200
 - vii. 5-bedroom family/scattered - \$1300
 - viii. 6 bedroom family/scattered - \$1400

- **Clarify process for entering into a repayment agreement and default. Updated to reflect HUD recommended monthly debt repayment amounts to not exceed 40% of the family’s monthly adjusted income.**

B. Repayment Agreement for Families for Families Currently in Occupancy with CMHA

1. A Repayment Agreement as used in this Plan is a document entered into between CMHA and a person who owes a debt to CMHA. It is similar to a Promissory Note but contains more detail regarding the nature of the debt, the terms of repayment, any special provisions of the agreement, and the remedies available to CMHA upon default of the agreement. The Repayment Agreement must be signed by the head of household and/or spouse/co-head.
2. CMHA may enter into a Repayment Agreement with a person only if they are able to make an initial payment and they are current on their recertification. The Property Manager or his/her authorized designee, may make exceptions to the terms of a Repayment Agreement.

Before executing a repayment agreement with a family, the PHA will require a down payment of 10 percent of the total amount owed. If the family can provide evidence satisfactory to the PHA that a down payment of 10 percent would impose an undue hardship, the PHA may, in its sole discretion, require a lesser percentage or waive the requirement.

If a family is paying less than 40 percent of its monthly adjusted income (MAI) in rent, the minimum monthly payment amount will be the greater of the following two amounts:

The difference between 40 percent of the family’s MAI and the TTP at the time the agreement is executed \$25

If a family can provide evidence satisfactory to the PHA that a monthly payment amount of \$25 would impose an undue hardship, the PHA may, in its sole discretion, require a lower monthly payment amount.

If the family’s income increases or decreases during the term of a repayment agreement, either the PHA or the family may request that the monthly payment amount be adjusted accordingly.

If a payment is not received by the 7th of each month, and prior approval for the missed payment has not been given by the PHA, the PHA will send the family a delinquency notice giving the family 30 business days to make the late payment. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and the PHA may terminate tenancy.

If a family receives three delinquency notices for unexcused late payments in a 12-month period, the repayment agreement will be considered in default, and the PHA will terminate tenancy.

D. Debts Due to Fraud/Non-Reporting of Information

Program fraud and abuse consists of a single act or pattern of actions that constitute false statement, omission, or concealment of a substantive fact, made with intent to deceive or mislead.

1. Families who owe money to CMHA due to the family’s failure to report increases in income will be required to repay in accordance with the guidelines in this Section.

1. 2. Families who owe money to CMHA due to program fraud will be required to repay the amount in full in 30 days. If the full amount is paid within this time period, and the family is still eligible, CMHA may continue assistance to the family. If, as a result of program fraud, a family owes an amount that exceeds \$5,000, eviction proceedings will be initiated against the tenant and the case will be referred to the HUD Inspector General. When appropriate, CMHA will also refer the case for criminal prosecution to the county prosecutor.
2. When a family refuses to repay monies owed to the PHA, in addition to termination of program assistance, the PHA will utilize other available collection alternatives including, but not limited to, the following:
 - a. Collection agencies
 - b. Small claims court
 - c. Civil lawsuit
 - d. State income tax set-off program

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

- **Language update to be consistent with verification requirements**

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, 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, when the value of net family assets exceeds the HUD-published threshold amount (adjusted annually and published in HUD's Inflation-Adjusted Values tables) and the actual returns from a given asset cannot be calculated. (applicable upon the PHA's HOTMA 102/104 compliance date);

SUMMARY OF PROPOSED CHANGES TO CMHA RESIDENTIAL DWELLING LEASE AGREEMENT

- **Language update to provide limited use of appliances and extension cords**

F. Payments and Charges Due Under the Lease.

6. Excess Utility Charges. The Excess Utility Charges are listed in the Maintenance Charge Schedule. The Tenant shall not install any additional major appliance, such as an air conditioner, washer, dryer, food freezer, additional refrigerator or other similar electrical appliances as well as extension cords without the prior written consent of CMHA. To receive approval, the head of household must complete a resident education on the proper installation and use.

Approval will not be granted for devices and appliances that exceed the designated electrical capacity, which will vary by unit. In dwelling units where utilities are provided by CMHA, a charge shall be assessed for excess utility consumption due to the operation of tenant-supplied major appliances. This charge does not apply to Tenants who pay their utilities directly to a utility supplier. CMHA will charge the Tenant an excess utility charge for the use of appliances in excess of one (1) stove and one (1) refrigerator.

- **Updated language to remove the requirement to use police report reviews at annual recertification.**

B. Re-determination of Rent, Dwelling Size, and Eligibility. The rent amount, as specified in Part I of the Lease Agreement, is fixed until changed as described below.

- 1) The status of each family is re-examined by an authorized CMHA representative⁸ at least once a year. CMHA will begin the recertification process 120 days in advance of the anniversary date of the lease agreement. At the annual recertification the Tenant shall certify to compliance with the eight (8) hours per month community service requirement, if applicable. CMHA will determine a household's eligibility for continued occupancy with regard to criminal activity pursuant to Section VI.C.5.c. of the Admissions and Continued Occupancy Policy. An updated report on criminal/drug activity will be reviewed as part of this annual recertification process.

- **Outlines restriction concerning the photographing, audio recording, and/or video recording to ensure the privacy and protection of employees, contractors and others, as well as to maintain a safe, respectful and professional work environment.**

V. TENANT'S OBLIGATIONS

8. Throughout this document, the term "CMHA representative(s)" may include CMHA employees, contractors, subcontractors and other agents hired by CMHA.

37. The photographing, audio recording, and/or video recording of employees, contractors, and others who are conducting agency-related business or activities while on CMHA premises as described above, is strictly prohibited without explicit prior consent of those employees, contractors, and others.

- **Updated to reflect HUD requirement to that residents receive a 30-Day Notification Prior to the Termination of the lease agreement**

X. TERMINATION OF LEASE

Written Notice of Proposed Termination.

CMHA shall give written notice of the proposed termination of the Lease of:

- 1) 30 days in case of failure to pay rent;

- **These addendums to the lease agreement provide clarity on CMHA's Smoke-Free Policy and Parking rules**

Addendums to Lease Agreement

- Smoke-Free Housing Addendum
- Parking Rules

The Cincinnati Metropolitan Housing Authority (CMHA) released a proposed Significant Amendment to its current FY2025 Housing Choice Voucher Administrative Plan and the Asset Management Admissions and Continued Occupancy Policy (ACOP) 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 ACOP can be found along at 1627 Western Ave, or on-line at www.cintimha.com. These are available for public inspection during normal business hours (Monday- Friday 8:00 AM – 4:40 PM). CMHA requests written comments no later than 4:30 p.m. **March 3, 2025** to 1627 Western Ave., Cincinnati, OH 45214 or by email to Geri.hernandez@cintimha.com.

During calendar year 2024, CMHA received **143** submissions for the transfers under the Violence Against Women Act (VAWA); **92** of the transfer requests were from the Asset Management program and **51** 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.

Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

During calendar year 2024, CMHA received **143** submissions for the transfers under the Violence Against Women Act (VAWA); **92** of the transfer requests were from the Asset Management program and **51** 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.

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.

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;
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD conversion.

“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.

(c) The PHA must submit its Deconcentration 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 percentage 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 percentage 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 percentage of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last completed PHA fiscal year.
- State and regional PHAs that provide Section 8 rental assistance in more than one metropolitan area within a State or region make these determinations separately for each metropolitan area or portion of a metropolitan area where the PHA has assisted at least 20 Section 8 families with children in the last completed PHA fiscal year.

B **New Activities.**

.2

(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 type="checkbox"/> | <input checked="" 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 partnering with a developer to facilitate the sale of vacant parcels within the HOPE VI development known as City West. This initiative aims to expand access to homeownership opportunities in the West End neighborhood while fostering community stability and long-term investment. Under this plan, the lots will be sold to the developer, who will manage the construction and development of high-quality homes designed. The project emphasized community engagement and aligns with CMHA's mission to create sustainable and thriving neighborhoods.

CMHA remains dedicated to leveraging its assets to support homeownership and neighborhood revitalization. This partnership reflects CMHA's ongoing efforts to promote homeownership, expand housing options, and encourage investment in the West End.

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 includes the construction of one, 42-unit, four-story building, located at 1750 Logan Street. The project site has been 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 (11) 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.

Collaboration with other PHAs: CMHA will continue to collaborate with other Public Housing Authorities (PHAs) to create affordable housing units that address the diverse needs of communities. Through partnerships such as the Intergovernmental Agreement with Logan County Metropolitan Housing Authority, CMHA is actively engaging as a co-developer to deliver projects that expand access to quality, affordable housing. These efforts include shared responsibilities in securing funding, overseeing construction, and managing leasing activities, ensuring the successful development and long-term operation of affordable housing. By leveraging collective expertise and resources, CMHA aims to strengthen its capacity to address housing needs across jurisdictions.

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 disposition, 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 dispose of the vacant land, the agreement(s) will be presented to the Board of Commissioners for final approval once the terms have been specified.

Additionally, CMHA is considering the inclusion of solar canopies as part of the redevelopment at English Woods. Solar energy solutions offer numerous benefits, particularly for low-income communities, by reducing utility costs, increasing energy independence, and promoting environmental sustainability. Incorporating renewable energy technologies would align with CMHA's mission to enhance residents' quality of life while fostering long-term operational savings and contributing to a greener community.

Avondale – CMHA is committed to the rehabilitation of affordable housing units in Avondale to provide high-quality, modernized homes for lower-income residents. Plans include the rehabilitation of the Beechwood property, with the project scheduled to close in 2025. Additionally, Maple Tower, President, and Redding properties will undergo significant upgrades through RAD (Rental Assistance Demonstration) Conversions. These rehabilitations will be completed to high-quality standards, ensuring safe, durable, and energy-efficient homes that enhance the living experience for residents. This work will not only improve the physical condition of the properties but also support the well-being and stability of lower-income families, fostering stronger, more sustainable communities in Avondale.

Scattered Sites: The Cincinnati Metropolitan Housing Authority (CMHA) is pursuing a comprehensive strategy to address its 1,211 scattered-site public housing units throughout Hamilton County through both the Rental Assistance Demonstration (RAD) and Section 18 disposition programs. This approach prioritizes long-term affordability, sustainability, and operational efficiency across the portfolio. The scattered sites are categorized into three groups: non-contiguous sites with 1-4 units, sites with 5 or more contiguous units, and sites identified for disposition. For the 642 units categorized as non-contiguous sites with 1-4 units, CMHA has determined that Section 18 disposition provides significantly better funding opportunities compared to RAD conversion. Under this approach, the units will be removed from the public housing program and converted to Project-Based Vouchers (PBVs) through the use of Tenant Protection Vouchers (TPVs), ensuring continued affordability while allowing for enhanced financial viability. CMHA is targeting a Section 18 application submission for these units by June. The remaining units in this category (AMP 208) will be evaluated under RAD conversion. For the 569 units grouped into 5 or more contiguous units, CMHA is focusing on a RAD conversion process. These units are being analyzed to determine how best to group them to maximize net operating income (NOI) and ensure financial sustainability following conversion. If specific units within this category are determined to be financially non-viable post-conversion, they may be reclassified for disposition under Section 18 guidelines. This dual-pronged approach underscores CMHA's commitment to leveraging HUD programs to preserve and modernize its scattered-site housing stock while aligning with long-term goals for operational efficiency and resident stability. Further updates on these efforts will be shared as the project progresses.

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

Over-the-Rhine -- CMHA is evaluating the best course of action for its Race Street properties (PIC ID: OH004000201 Race Street Apartments) at 1706-1728 Race Street, Cincinnati, OH 45202. Options under consideration include the rehabilitation of some or all units to high quality, modern standards or the disposition of some or all units due to the significant amount of work required and limited available capital and soft funding sources. If rehabilitation is pursued, plans may include transforming the first floors into retail spaces to support the surrounding community while upgrading the residential units above into energy-efficient and modern affordable housing. Additionally, other scattered site properties in AMP 201 may be rehabilitated through RAD (Rental Assistance Demonstration), Section 18, or disposed of in a manner consistent with CMHA's mission to enhance affordable housing opportunities.

CMHA has already received a CHAP (Commitment to Enter into a Housing Assistance Payments) Award as of March 20, 2024, and intends to request Tenant Protection Vouchers that will be project-based in the event rehabilitation is selected. Whether through rehabilitation or the disposition of some or all of the units, CMHA remains committed to providing stable and high-quality housing for low-income residents. These efforts will align with CMHA's mission to support neighborhood revitalization, create vibrant mixed-use spaces, and improve residents' living conditions.

West End Properties – CMHA is actively developing strategies to create homeownership opportunities, both affordable and potentially market-rate, on vacant parcels owned by CMHA in the West End neighborhood of Cincinnati. To advance this initiative, CMHA may issue a Request for Qualifications (RFQ) to identify development partners for these lots in the West End. Additionally, CMHA is evaluating a comprehensive modernization plan for the Kindel property, located within the West End. This strategy also includes the vacant single-family dwelling (SFD) parcels in City West, ensuring a cohesive approach to revitalizing the neighborhood and expanding housing opportunities.

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 (RAD):

Rental Assistance Demonstration Program and Section 18 – The Cincinnati Metropolitan Housing Authority is committed to transitioning its public housing portfolio through the Rental Assistance Demonstration (RAD) and Section 18 programs over the coming years. This strategic approach aims to preserve affordable housing and facilitate substantial capital improvements. CMHA may also utilize HUD's RAD Transfer of Assistance program, which permits the relocation of housing assistance from non-viable existing units to new, sustainable units, thereby ensuring long-term affordability.

Initially, HUD granted CMHA a RAD Portfolio Award on June 11, 2018, reserving conversion authority for 4,415 public housing units. This award was updated on September 15, 2019, in line with the revised RAD Notice H-2019-09 PIH-2019-23 (HA), which converted all existing Multiphase awards to Portfolio awards and implemented changes to the requirements for existing awards. Consequently, CMHA plans to convert several Asset Management units to Project-Based Vouchers (PBVs) or Project-Based Rental Assistance (PBRAs) under the guidelines of the revised notice and any successor PIH Notices, rules, and regulations. Throughout this process, CMHA will uphold resident rights, participation, waiting list protocols, and grievance procedures as mandated by HUD, ensuring compliance with all fair housing and civil rights requirements. For all RAD conversions, CMHA will adhere to applicable site selection criteria as outlined in RAD Notice H 2016-17; PIH 2016-17, and any additional guidance provided by HUD. The agency will also certify that site selections meet accessibility standards under the Fair Housing Act, Section 504, and the Americans with Disabilities Act (ADA).

CURRENT RAD CHAPS:

CMHA has active Commitments to Enter into a Housing Assistance Payment (CHAPs) on thirteen properties: Beechwood (149 units), Winton Terrace Phase I (185 units), Marquette Manor (140 units), Findlater Gardens (653 units), Maple (120 units), President (96 units), Redding (100 units), Stanley Rowe Hi-Rise (355 units), Stanley Rowe Multifamily (66 units), Millvale (382 units), City West Laurel (160 units), City West Lincoln (206 units) and Race Street (19 units). Relocation will be required to complete these projects.

Race Street (AMP 201): The Cincinnati Metropolitan Housing Authority is advancing plans to redevelop the Race Street properties, located between 1706 and 1728 Race Street in Cincinnati's Over-the-Rhine (OTR) neighborhood, through a comprehensive Rental Assistance Demonstration (RAD) conversion. This initiative will transform the existing seven multi-family buildings, built between 1870 and 1910, into modernized, sustainable housing while preserving long-term affordability for residents.

The redevelopment involves the rehabilitation of 23 units, which will be reconfigured into 19 residential units and 5 commercial spaces. The RAD conversion ensures that the residential units will be supported by Project-Based Rental Assistance (PBRA), securing a stable funding source for future operations. As part of the revitalization, many of the first floors of the buildings will return to their original commercial use, aligning with the surrounding OTR neighborhood's mixed-use development character and supporting the area's economic vitality.

The scope of work includes significant interior and exterior renovations. Planned improvements encompass gut rehabilitation, including updates to HVAC systems, windows, insulation, kitchens, and bathrooms, as well as exterior upgrades such as tuck-pointing, brickwork repairs, balcony replacements, and façade painting. These enhancements will ensure the buildings meet modern housing standards and provide safe, comfortable, and efficient living spaces for residents.

Relocation efforts will be managed in full compliance with RAD guidelines, ensuring that all affected residents have the right to return to the rehabilitated units. Temporary relocation, where necessary, will be handled thoughtfully, with minimal disruption to residents. CMHA's relocation team is actively engaging with households to provide tailored support throughout the transition. The Race Street rehabilitation aligns with CMHA's mission to preserve affordable housing while supporting the broader revitalization efforts of the Over-the-Rhine community. This project underscores CMHA's commitment to sustainable development, economic integration, and enhanced quality of life for its residents. Updates will be provided as the project progresses through its key milestones.

Beechwood (AMP 211): The Cincinnati Metropolitan Housing Authority (CMHA) has been issued a Commitment to Enter into a Housing Assistance Payments (CHAP) contract on September 21, 2023 for all 149 units at The Beechwood. The Beechwood project has secured all necessary financing and is moving toward a closing in early 2025. The project will proceed with the RAD Conversion, and Beechwood residents will experience temporary relocation during the planned 18-month construction schedule. The relocation will affect one building, encompassing 146 units both pre- and post-RAD conversion, impacting approximately 149 households. In accordance with the requirements of the Rental Assistance Demonstration (RAD) program, no current tenants will be permanently or involuntarily displaced. Resident relocation will be conducted in full compliance with HUD Notice H 2014-09/PIH 2014-17 (as applicable), the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), fair housing and civil rights requirements, and, if applicable, Section 104(d). CMHA is committed to ensuring a smooth and compliant relocation process for all affected residents, supporting them throughout the construction period.

Winton Terrace (AMP 209) and Findlater Gardens (AMP 210): The Cincinnati Metropolitan Housing Authority (CMHA) is actively evaluating two redevelopment options for Winton Terrace and Findlater Gardens to preserve and modernize affordable housing while ensuring long-term stability for residents. These options include a RAD/Section 18 Construction Blend and a Section 18 Partial Disposition. Both pathways align with CMHA's mission to provide high-quality, sustainable housing solutions and demonstrate its commitment to the residents of these communities.

CMHA has been issued a Commitment to Enter into a Housing Assistance Payments (CHAP) contract on December 27, 2024, for all 608 units at Winton Terrace and 653 units at Findlater Gardens under HUD's Rental Assistance Demonstration (RAD) program. As part of this effort, CMHA plans to initiate the RAD conversion process, beginning with the first 185 units at Winton Terrace under HUD's recently published Notice PIH 2024-40 (HA), which permits the use of a RAD/Section 18 Construction Blend. This approach will involve the renovation of 185 units located in 29 buildings. The units will be transferred to a related entity, and Project-Based Vouchers (PBVs) will be committed to create a more stable funding source. A 30-year use agreement will be tied to each unit, ensuring that the properties continue to operate as affordable housing. As part of the RAD conversion, 5% of the units—ten in total—will be reconfigured

to meet Uniform Federal Accessibility Standards (UFAS) requirements. CMHA is committed to ensuring that all affected residents are supported throughout the transition, with no permanent, involuntary displacement in accordance with RAD program guidelines.

Simultaneously, CMHA is considering a Section 18 Partial Disposition for the same 185 units at Winton Terrace. If pursued, CMHA would submit a Section 18 application to HUD's Special Applications Center (SAC). Upon approval, these units would be transferred to a related entity, and CMHA would request Tenant Protection Vouchers (TPVs), which would be project-based to maintain affordability. Following disposition, these units would be renovated and continue to operate as family units, with a 30-year use agreement to preserve affordability and modernization efforts. Additionally, 5% of the units would be reconfigured to meet UFAS requirements.

In both scenarios, CMHA remains committed to protecting residents and ensuring a seamless transition. The agency will adhere to all applicable HUD regulations, including provisions for relocation assistance and resident engagement. No permanent, involuntary displacement will occur, and every effort will be made to minimize disruptions to residents.

These redevelopment efforts underscore CMHA's dedication to maintaining affordable housing while improving the quality of life for residents at Winton Terrace and Findlater Gardens. As CMHA evaluates these two options, it will work closely with HUD and other stakeholders to determine the most effective path forward. Updates on the progress of these plans will be communicated as developments occur.

Marquette Manor (AMP 218): Marquette Manor Tower, located in English Woods is a recently financially closed RAD transaction as of December 19, 2024. The property consists of 140 one-bedroom units and one property management office. Construction is scheduled to begin in January 2025 to undertake a substantial rehabilitation of the building. The interior renovations will include critical upgrades such as new windows and lintels, HVAC system improvements, replacement of water lines and waste stacks, and updates to interior and exterior doors. Additional enhancements will include new insulation, modernized kitchens and bathrooms, and upgraded flooring. Exterior work will involve replacing the ground-level patio, repaving the parking lot, bringing balcony windows up to code, enhancing landscaping, and adding recreational amenities for tenants. CMHA has been meeting with residents on a monthly basis to provide updates and address any questions or concerns regarding the project. This initiative reflects CMHA's commitment to preserving and modernizing affordable housing, ensuring safe and high-quality living conditions for its residents.

Maple (AMP 211): The Cincinnati Metropolitan Housing Authority (CMHA) has been issued a Commitment to Enter into a Housing Assistance Payments (CHAP) contract on December 13, 2024, for all 120 Units. The property will undergo selective rehabilitation, including potential conversion to the Rental Assistance Demonstration (RAD) program. Renovation efforts will involve trashing out units, repairing drywall, painting walls, ceilings, and doors, and addressing water and termite damage. Kitchens will be upgraded with new cabinets, countertops, appliances, and luxury vinyl tile flooring. Bathrooms will receive new faucets, mirrors, tubs, ceramic tile flooring, and ventilation improvements. Additional interior updates include replacing doors, hardware, and flooring with luxury vinyl tile, as well as installing smoke detectors, carbon monoxide detectors, and energy-efficient LED lighting. Electrical systems will be upgraded, and heating and cooling systems will be replaced to improve overall efficiency. Exterior improvements will focus on site lighting, landscaping, parking lot resurfacing, and enhancing the property's curb appeal.

Race Street (AMP 201): The Race Street project was awarded its initial CHAP March of 2024. CMHA has not submitted the Finance Plan for the Race Street project at this time as the PHA is still finalizing the details of the construction costs of the project. CMHA meets with residents on a monthly basis to provide updates and respond to any questions that residents may have. Once underway, the Race Street residents will experience temporary relocation while the project is being completed. The Race Street Relocation Plan envisions a relocation process to occur over a 12-month construction schedule. All residents will need to relocate at some point in the construction process as this will be a gut rehab to all units and common areas. The relocation will affect 7 buildings totaling 23 units (Pre-RAD) and 19 units (Post-RAD) (1B:5, 2B:9, 3B:5). Approximately 18 households will be affected at closing due to attrition and current vacancies. 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).

President (AMP 213): The Cincinnati Metropolitan Housing Authority (CMHA) has been issued a Commitment to Enter into a Housing Assistance Payments (CHAP) contract on December 13, 2024 for all 96 Units. The property requires substantial rehabilitation, potentially through conversion to the Rental Assistance Demonstration program. Renovation tasks include trashing out units, repairing drywall, painting walls, ceilings, and entry doors, addressing termite and water damage, insulating where possible, and gutting kitchens for new cabinets and appliances. Bathrooms will see faucet, mirror, and shower replacements, along with ceramic tile flooring and ventilation upgrades. Interior upgrades encompass new doors, hardware, light fixtures, and smoke detectors, while electrical systems will be enhanced to provide a minimum of 100 amps per apartment, with LED lighting throughout.

Redding (AMP 213): The Cincinnati Metropolitan Housing Authority (CMHA) has been issued a Commitment to Enter into a Housing Assistance Payments (CHAP) contract on December 19, 2024 for all 100 Units. The property requires substantial rehabilitation, potentially through conversion to the Rental Assistance Demonstration program. Renovation tasks include replacing aging bathtubs, shower surrounds, kitchen appliances, cabinets, and countertops. Additionally, fan coil units, elevator machinery, chillers, condensers, and heating boilers, among other HVAC equipment, will be replaced due to age and wear. Common area features like vinyl tile and suspended ceilings will also undergo replacement. Furthermore, measures will be taken to address issues with automatic door openers, install identification signage, and repair damaged site fencing to improve accessibility and security. Roof drainage problems will also be rectified to prevent damage.

Stanley Rowe Hi-Rise Towers (AMP 215): 355 Units and Stanley Rowe Multifamily (AMP 214): 66 Units: The Cincinnati Metropolitan Housing Authority is committed to redeveloping both the Stanley Rowe Towers and Rowhouses to preserve affordable housing and enhance the quality of life for residents. The redevelopment process will leverage either the Rental Assistance Demonstration (RAD) program or a Section 18 disposition, with both options being considered viable alternatives to achieve these goals.

Stanley Rowe Towers, consisting of 355 units across two high-rise buildings, and the adjacent 66-unit Stanley Rowe Rowhouses are in need of total renovation. As part of the planning process, CMHA intends to ensure that all residents will benefit from the transformation through comprehensive resident engagement, adherence to HUD guidelines, and the incorporation of community feedback.

Under the RAD program, CMHA plans to convert the units to Project-Based Rental Assistance (PBRA) or Project-Based Vouchers (PBVs), ensuring a stable and sustainable funding source. This approach aligns with HUD's goals to preserve affordable housing while modernizing units to meet current standards.

Alternatively, CMHA is exploring a Section 18 disposition application to transfer the properties to a related entity, with the potential to request Tenant Protection Vouchers that would also be project-based. Both pathways prioritize long-term affordability through a 30-year use agreement tied to each unit.

CMHA is dedicated to supporting residents throughout this transition. No permanent, involuntary displacement will occur, and all affected households will have the right to return to newly renovated units. To ensure this, CMHA will develop a comprehensive relocation plan that includes counseling, mobility assistance, and continued community engagement.

Through this redevelopment effort, CMHA aims to transform the Stanley Rowe Towers and Rowhouses into modern, sustainable, and inclusive communities that reflect the needs and aspirations of their residents. The agency will continue to evaluate both RAD and Section 18 as redevelopment options and provide updates as plans progress.

Millvale (AMP 217): 382 Units: The Cincinnati Metropolitan Housing Authority (CMHA) is exploring redevelopment options for Millvale North and South to modernize and preserve affordable housing in Cincinnati. The redevelopment will leverage either the Rental Assistance Demonstration (RAD) program or a Section 18 disposition as viable alternatives to meet the community's needs and align with CMHA's mission to provide high-quality, sustainable housing solutions.

Millvale currently consists of 381 public housing units, including one non-dwelling unit, located on CMHA-owned property. The units require substantial rehabilitation or replacement. CMHA seeks to transform the property into a modern, mixed-income community while maintaining a strong commitment to affordability and resident protections.

Under the RAD program, CMHA intends to convert the Millvale units to Project-Based Rental Assistance (PBRA) or Project-Based Vouchers (PBVs). This approach provides a stable and sustainable funding source, facilitating the preservation of affordable housing and ensuring compliance with HUD guidelines. Alternatively, CMHA is considering a Section 18 disposition application, which would involve transferring the units to a related entity and utilizing Tenant Protection Vouchers (TPVs) to maintain affordability. Both approaches prioritize the development of a mixed-income community incorporating affordable RAD units, LIHTC units, and potentially market-rate units. Resident engagement remains central to this effort, with plans for multiple community meetings to gather input and ensure alignment with resident needs and aspirations.

Throughout the process, CMHA is committed to minimizing disruptions for residents. Temporary relocations may be necessary during construction phases, but all affected residents will retain the right to return to the redeveloped units. No permanent, involuntary displacement will occur. Furthermore, the redevelopment will be conducted in compliance with all applicable HUD regulations, including Section 3 hiring and training goals to promote economic opportunities for local residents.

CMHA recognizes the importance of stakeholder collaboration and intends to work closely with HUD, and local governmental entities to secure financing through various means, including LIHTC allocations, local government funding, bond financing, and other resources.

City West Lincoln

- Lincoln 1 (AMP 301): 47 Units
- Lincoln 2 (AMP 302): 56 Units
- Lincoln 3 (AMP 303): 40 Units
- Lincoln 4 (AMP 306): 63 Units

City West Laurel

- Laurel 1 (AMP 304): 62 Units
- Laurel 2 (AMP 305): 19 Units
- Laurel 3 (AMP 307): 26 Units
- Laurel 5 (AMP 308): 53 Units

The Cincinnati Metropolitan Housing Authority (CMHA) is actively exploring redevelopment options for City West to modernize and preserve affordable housing while enhancing the quality of life for residents. This redevelopment initiative focuses on the existing 686-unit mixed-finance housing development and includes plans for significant renovations or replacements across all units. To achieve these goals, CMHA is considering both the Rental Assistance Demonstration (RAD) program and a Section 18 disposition as viable pathways for the revitalization effort.

Under the RAD program, CMHA would convert the City West units to Project-Based Rental Assistance (PBRA) or Project-Based Vouchers (PBVs), providing a stable and sustainable funding source for long-term affordability. Alternatively, CMHA may pursue a Section 18 disposition, which would involve transferring units to a related entity and utilizing Tenant Protection Vouchers (TPVs) to maintain affordability. In either case, CMHA is committed to a one-for-one replacement of affordable housing units. Redeveloped units will consist of a mix of affordable RAD units, LIHTC units, and potentially market-rate units, depending on financing and community needs.

The redevelopment will focus on modernizing City West to include energy-efficient designs, broadband internet access, updated security systems with keyless entry, and other features that enhance resident safety and convenience. CMHA plans to address the comprehensive needs of residents by integrating community areas and outdoor recreational facilities into the redevelopment. Temporary relocations may be necessary during the renovation process, but CMHA ensures that all affected residents will have the right to return to newly rehabilitated units, with no permanent, involuntary displacement.

Collaboration with Gorman & Company, LLC, as a co-developer, will enable CMHA to leverage Low-Income Housing Tax Credits (LIHTCs), bond financing, and other resources to achieve financial feasibility for the project. The redevelopment plan aligns with HUD regulations and prioritizes Section 3 compliance to promote economic opportunities for local residents and businesses.

Through this initiative, CMHA aims to transform City West into a vibrant, sustainable, mixed-income community while preserving its commitment to affordable housing. Updates on the progress of this redevelopment will be shared as plans are finalized and approvals are secured.

Summary: The Cincinnati Metropolitan Housing Authority has outlined an ambitious pipeline for 2025, focusing on the redevelopment and modernization of multiple properties through the Rental Assistance Demonstration (RAD) program and Section 18 dispositions. CMHA has active Commitments to Enter into a Housing Assistance Payments (CHAP) contract for the key projects above, including Beechwood (149 units), Winton Terrace Phase I (185 units),

Marquette Manor (140 units), and Race Street (19 units). These projects will undergo significant rehabilitation or reconstruction to address infrastructure needs while ensuring long-term affordability through Project-Based Rental Assistance (PBRA) or Project-Based Vouchers (PBVs). Notable efforts include the substantial rehabilitation of Race Street’s historic buildings in Over-the-Rhine, the RAD/Section 18 blend at Winton Terrace, and the comprehensive modernization of Beechwood and Marquette Manor. All projects prioritize resident protections, including relocation assistance, the right to return, and compliance with HUD regulations.

In addition to these CHAP projects, CMHA is advancing planning efforts for larger-scale developments such as the Stanley Rowe Towers and Rowhouses (421 units), Millvale (382 units), and City West (686 units). These initiatives aim to transform aging public housing stock into modern, mixed-income communities with updated amenities, energy-efficient designs, and enhanced safety features. Strategic collaborations with co-developers and funding partners will leverage Low-Income Housing Tax Credits (LIHTCs), bond financing, and local funding to support these ambitious redevelopment efforts. By addressing the diverse needs of its properties and residents, CMHA is setting the stage for transformative growth, prioritizing sustainability, affordability, and quality of life for its residents while reaffirming its commitment to the future of affordable housing in Cincinnati.

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 table below 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 957 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, Riverview San Marco and Marquette Manor. 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.

CFPP Debt

CMHA currently has debt under the Capital Fund Financing Program with a principal balance of \$1,043,548 at 12/31/2024. CMHA makes a monthly payment on this debt on an amortization schedule with a final payoff date of 10/1/2025.

Development #1:

Name of Public Housing Development:	Pic Development ID:	Conversion Type (i.e., PBV or PBRA):	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):
Scattered Sites – 1–4-unit bldgs. on non-contiguous sites	OH004-000201 OH004-000202 OH004-000203 OH004-000204 OH004-000205 OH004-000206 OH004-000207 OH004-000208	Section 18/Non-RAD or RAD PBVs	N/A
Total Units:	Pre: RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit type if different (i.e., Family, Senior, etc.):	Capital Fund Allocation of Development:
642	Family	Family	\$175,000 (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) N/A		

Development #2:

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):
Scattered Sites – RACE STREET	OH004-000201	RAD PBV (4 units) Section 19 PBV (19 units)	N/A
Total Units:	Pre: RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit type if different (i.e., Family, Senior, etc.):	Capital Fund Allocation of Development:
28	Family	Family	\$677,616 (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	5	Converted to first floor retail units
Two Bedroom	10	9	Converted to first floor retail units
Three Bedroom	12	5	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) N/A		

Development #3:

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):
Beechwood	OH004-000211	RAD PBRA	N/A
Total Units:	Pre: RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit type if different (i.e., Family, Senior, etc.):	Capital Fund Allocation of Development:
149	Family	Family	\$625,000 (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) N/A		

Development #4:

Name of Public Housing Development:	Pic Development ID:	Conversion Type (i.e., PBV or PBRA):	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):
Winton Terrace – PHASE I	OH004-000209	RAD Blend/Section 18 PBV	N/A
Capital Fund Allocation of Development:	Pre: RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit type if different (i.e., Family, Senior, etc.):	Capital Fund Allocation of Development:
185	Family	Family	\$625,000 (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) N/A		

Development #5:

Name of Public Housing Development: Winton Terrace – PHASES 2 and 3	Pic Development ID: OH004-000209	Conversion Type (i.e., PBV or PBRA): RAD Blend/Section 18 PBV	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A
Total Units: 423	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family	Capital Fund Allocation of Development: \$625,000 (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) N/A		

Development #6:

Name of Public Housing Development: Findlater Gardens	Pic Development ID: OH004-000210	Conversion Type (i.e., PBV or PBRA): PBRA/RAD PBV Blend/Section 18 PBV	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A
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653	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family	Capital Fund Allocation of Development: \$2,120,000 (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) N/A		

Development #7:

Name of Public Housing Development: Marquette Manor	Pic Development ID: OH004-000218	Conversion Type (i.e., PBV or PBRA): RAD PBRA	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A
Total Units: 140	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family	Capital Fund Allocation of Development: \$575,000 (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) N/A		

Development #8:

Name of Public Housing Development: Maple Tower	Pic Development ID: OH004-000211	Conversion Type (i.e., PBV or PBRA): RAD PBRA/Section 18 PBV	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A
Total Units: 120	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family	Capital Fund Allocation of Development: \$550,000 (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) N/A		

Development #9:

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):
The President	OH004-000213	RAD PBRA/Section 18 PBV	N/A
Total Units: 96	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family	Capital Fund Allocation of Development: \$480,000 (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) N/A		

Development #10:

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):
The Redding	OH004-000213	RAD Blend/ PBRA/Section 18 PBV	N/A
Total Units: 100	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family	Capital Fund Allocation of Development: \$480,000 (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) N/A		

Development #11:

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):
Stanley Rowe and Liberty St. Apts.	OH004-000214	PBRA/Section 18 PBV	N/A
Total Units:	Pre: RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit type if different (i.e., Family, Senior, etc.):	Capital Fund Allocation of Development:
554	Family	Family	<u>\$1,850,000</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	26	26	
One Bedroom	161	161	
Two Bedroom	255	255	
Three Bedroom	101	101	
Four Bedroom	9	9	
Five Bedroom	2	2	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

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):
Millvale	OH004-000217	RAD Blend/PBRA/Section 18 PBV	N/A
Total Units:	Pre: RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit type if different (i.e., Family, Senior, etc.):	Capital Fund Allocation of Development:
468	Family	Family	<u>\$1,550,000</u> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	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) N/A		

Development #13:

Name of Public Housing Development: City West	Pic Development ID: OH004000301 OH004000302 OH004000303 OH004000304 OH004000305 OH004000306 OH004000307	Conversion Type (i.e., PBV or PBRA): RAD Blend/PBRA/Section 18 PBV	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A
Total Units: 624 (334 ACC)	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family/Senior	Capital Fund Allocation of Development: \$1,250,000 (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) N/A		

Development #14:

Name of Public Housing Development: Scattered Sites – 5+ unit bldgs. or contiguous groupings	Pic Development ID: OH004-000201 OH004-000202 OH004-000203 OH004-000204 OH004-000205 OH004-000206 OH004-000207 OH004-000208	Conversion Type (i.e., PBV or PBRA): RAD PBRA or Section 18 Blend of RAD PBV/Non- RAD PBV	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): N/A
Total Units: 569	Pre: RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit type if different (i.e., Family, Senior, etc.): Family	Capital Fund Allocation of Development: \$175,000 (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) N/A		

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. 36 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 FY14 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 the 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),40 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 affects the residents’ 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 an 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.⁴¹ 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 program wide, 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.⁵¹ 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 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; or 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 for 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.⁵⁴ 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 unit 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, 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).⁵⁵

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:⁵⁶ a. Resident Eligibility. Residents have the right to move with tenant-based rental assistance (e.g., Housing Choice Voucher (HCV)) the later of: (a) 24 months from the 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.⁵⁷ • 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.59

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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD conversion.

Planned Funding Sources - CMHA will accomplish the development of affordable housing by using a 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 underused, 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 comprehensive assessment recommendations and findings, CMHA can make informed and thoughtful recommendations to HUD on the possible demolition or disposition of properties. As any planned demolition or disposition is undertaken, CMHA will seek to replace the units in the same communities as long as the neighborhood is below city/county average poverty rates, are potentially in an area of opportunity, and/or the long-term residents of the units are satisfied connected with the neighborhood and view the community as home or are part of a neighborhood revitalization plan. The objective is to provide quality and safe housing that operates efficiently and effectively for our residents. Multiple approaches are being evaluated to continue to deliver quality sustainable housing units and to pursue the perseverance of sustainable affordable housing units that provide choice and opportunity for our residents. To accomplish this objective and after due diligence, concepts such as acquisition/rehabilitation, new construction for replacement units as well as conversion of rental single-family homes to homeownership and review of other funding programs are being considered and implemented. Some of these options are discussed throughout this annual plan.

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

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

Column 2 describes whether CMHA is pursuing demolition or disposition.

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

Columns 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
AM P	Development	Dev #	Type	Status	Date	Effected Area		Timeline	Narrative
201	1708-1726 Race Street	OH004-39	Demo/Dispo	Planned	4/25	23 Units	Partial	4/25-4/26	CMHA may complete a one for one replacement
201	122 & 130 McMicken Ave	OH004-40	Dispo	Planned	4/25	5 Units	Partial	4/25-4/26	CMHA may complete a one for one replacement
208	415-437 Rockdale	OH004-40	Demo/Dispo	Planned	7/25	12 Units	Partial	8/25-8/26	CMHA may complete a one for one replacement
201	4048 Ledgewood	OH004-39	Dispo	Planned	7/25	12 Units	Partial	8/25 -8/26	CMHA may complete a one for one replacement
208	415-417 Catherine	OH004-23	Demo/Dispo	Planned	7/25	4 Units	Partial	10/25-10/26	CMHA may complete a one for one replacement

208	418 Kasota	OH004-40	Demo/Dispo	Planned	7/25	7 Units	Partial	10/25-10/26	CMHA may complete a one for one replacement
211	3460 Hallwood Lane	OH004-19	Dispo	Planned	4/25	Land Only	Partial	4/25-4/26	
218	1999 Sutter (Marquette)	OH004-11	RAD	Approved	10/25	140 Units	Partial	RAD Conversion	CMHA may complete a one for one replacement
218	English Woods Land	OH004-04	Dispo	Planned	4/25	Land Only	Total	10/25-10/26	
	Laurel Homes	City West	Dispo	Amend Approved	2/24	Land Only	Partial	4/24-4/27	CMHA may complete a one for one replacement
205	Grandview/Considine	OH004-39	Dispo	Planned	10/24	Land Only	Partial	1/2—3/25	
207	211 E. Broadway	OH004-58	Dispo	Planned	4/24	Land Only	Partial	2/25-4/26	
	7 E. McMillian	OH004-40	Dispo	Approved	12/22	Building and Land	Completed		
206	1701-1705 Vinton	OH004-	Dispo	Planned	12/23	2 units	Partial	2/25-4/26	
208	Washington Ter	OH004-	Dispo	Planned	5/25	Land only	Partial	9/25-8/26	
205	518 Rosemont	OH004-59	Dispo	Planned	2/25	2 units	Partial	2/25-2/26	
208	920-922 Nassau	OH004-39	Dispo	Planned	2/25	Buildings and Land	Partial	2/25-2/26	
201	2821 Rosella	OH004-40	Dispo	Planned	2/25	Land	Partial	2/25-2/26	

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	2025-2026	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	2025-2026	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	2025-2026	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	2025-2026	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	2025-2026	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	2025-2026	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	2025-2026	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	2025-2026	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 is being developed for the developments below:

Development Name	AMP	Designation Type	Anticipated Application Date	Number of Units
Central YMCA	OH004000311	Elderly	06/03/24	15
Cary Crossing	OH004000312	Disabled	06/03/24	8
West Union Square	OH004000313	Elderly	06/03/24	19
Logan Commons	OH004000319	Elderly	06/03/24	8

CMHA plans to submit an elderly designation plan to HUD that includes Central YMCA, Carry Crossing, West Union Square 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	Approved /Pending Submission	
AMP 202	Various Addresses	Scattered Sites	14	Approved /Pending Submission	
AMP 203	Various Addresses	Scattered Sites	15	Approved /Pending Submission	
AMP 204	Various Addresses	Scattered Sites	12	Approved /Pending Submission	
AMP 205	OH004-27	Quebec Gardens	40	Approved /Pending Submission	
AMP 205	Various Addresses	Scattered Sites	12	Approved /Pending Submission	
AMP 206	Various Addresses	Scattered Sites	15	Approved /Pending Submission	

AMP 207	Various Addresses	Scattered Sites	21	Approved /Pending Submission
AMP 208	Various Address	Scattered Sites	27	Approved /Pending Submission
AMP 208	OH004-29	Rion Lane	40	Approved /Pending Submission
AMP 209	OH004-001	Winton Terrace	58	Approved /Pending Submission
AMP 210	Various Addresses	Findlater Gardens	22	Approved/Pending Submission
AMP 211	OH004-07	Beechwood	45	Approved/Pending Submission
AMP 211	OH004-19	Maple	45	Approved/Pending Submission
AMP 213	OH004-20	Redding	110	Approved/Pending Submission
AMP 213	OH004-21	President	99	Approved/Pending Submission
AMP 214	OH004-17	SRT Rowe Houses	66	Approved/Pending Submission
AMP 217	OH004-06	Millvale	16	Approved /Pending Submission

Progress Report.

**B
.3**

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 for affordable homeownership
15. Recover from PHAS troubled status

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.

	<p>10. Implement green and sustainable housing initiatives such as net/near zero, enterprise green and LEED.</p> <p>11. Continue to further fair housing throughout Hamilton County.</p> <p>12. Continue to work towards improving residents' self-sufficiency through the Envision centers</p> <p>13. Increase broadband internet access throughout the agency for all residents</p> <p>14. Review and update all lease agreements and house rules</p> <p>15. Continue to preserve affordable housing throughout Hamilton County</p> <p>16. Work toward strengthening relationships with the City of Cincinnati.</p> <p>17. Work toward strengthening relationships with Hamilton County.</p> <p>18. Strengthen partnerships with community groups</p> <p>19. Continue to strengthen partnerships to preserve current housing and develop additional affordable housing throughout the community.</p> <p>20. Complete the first phase on Winton Terrace</p> <p>21. Increase resident owned business participation through our transformation plans</p> <p>22. Increase MBE, WBE and Section 3 business participation</p> <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>Progress Report: 2024 CMHA Accomplishments:</p> <ol style="list-style-type: none"> 1. Development of a new strategic plan 2. Updated the ACOP 3. CMHA achieved high performer status under SEMAP for the Housing Choice Voucher Program in 2024 4. Updated personnel policies to meet today's work force 5. Continued successful engagement of Section 3, MBE, WBE goals 6. Completed the construction of – Logan Commons 7. Started the transformation of Anderson/scattered homes 8. Completed the transformation of Riverview/SanMarco 9. Received no finding on the 2024 financial audit 10. Financial closing on Beechwood 11. Received the Family Self Sufficiency grant again for calendar 2025 12. Completed two Sherwin Williams Training Classes 14. Distributed through our Book Enrichment Program over 10,000 Books 15. Updated our Procurement Policy 16. Updated our HCV Administrative Plan 17. Updated agency wide Standard Operating Procedures 18. Financial closing on Marquette 19. Updated and implemented changes associated to Risk Management that covers all programs 20. Updated and enhanced cyber security platforms and reestablished cyber insurance 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 22. Transferred City West to CMHA
<p>B .4</p>	<p>Capital Improvements. 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>“See CFP 5-Yr Plan for 2024-2028 approved by HUD on 05/06/2024 in EPIC & the proposed CFP 5-YR Plan for 2025-2029 to be submitted subsequent to the public hearing”</p>
<p>B .5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>The 2024 audit has been completed and there were no findings.</p>
<p>C .</p>	<p>Other Document and/or Certification Requirements.</p>
<p>C .1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p>

	<p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>(c) The document is out for a 45 day public comment period that expires on Friday, March 7, 2025.</p>
<p>C .2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>This document is still being reviewed by State and Local Officials. The document is out for a 45 day public comment period that expires on Friday, March 7, 2025.</p>
<p>C .3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>This document is still being reviewed by State and Local Officials. The document is out for a 45 day public comment period that expires on Friday, March 7, 2025.</p>
<p>C .4</p>	<p>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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> <p>The document is out for a 45 day public comment period that expires on Friday, March 7, 2025.</p>
<p>C .5</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>There is a Recovery Agreement being developed at this time.</p>

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 regarding 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

CMHA will be clear about its responsibility to provide reasonable accommodation 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

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

CMHA's Public Housing Program:

The Admissions and Continued Occupancy Policy ("ACOP") governs the HUD-assisted public housing operated by the Cincinnati Metropolitan Housing Authority.

Section I – Non-discrimination and Accessibility

B. Compliance with Civil Rights Laws

1. It is the policy of the Cincinnati Metropolitan Housing Authority (CMHA) to comply with all laws relating to Civil Rights, including but not limited to:
 - a. Title VI of the Civil Rights Act of 1964;
 - b. Title VIII of the Civil Rights Act of 1968 (as amended by the 1974 HCDA and the Fair Housing Amendments Act of 1988).
 - c. Executive Order 11063, and 13988
 - d. Section 504 of the Rehabilitation Act of 1973;
 - e. The Age Discrimination Act of 1975;
 - f. Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern);
 - g. Any applicable State laws or local ordinances;
 - h. Any legislation protecting the individual rights of tenants, applicants or staff that may subsequently be enacted.
 - i. The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012, and further clarified in Notice PIH 2014-20.
2. CMHA shall not discriminate because of race, natural hair types and natural hair styles commonly associated with race, gender, gender identity, sex (including pregnancy, childbirth, and related medical conditions), age, color, religion, disability status, marital status, familial status, military status, sexual orientation, ethnic origin, national origin, or Appalachian regional origin, ancestry, or citizenship⁹ in the leasing, rental, or other disposition of housing or related facilities, including land that is part of any project or projects under CMHA's jurisdiction covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.
3. CMHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under its Asset Management Programs on the basis of any protected category. In addition, CMHA shall not:
 - a. Deny anyone the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs;
 - b. Provide anyone housing that is different from that provided others¹⁰;
 - c. Subject anyone to segregation or disparate treatment;
 - d. Restrict anyone's access to any benefit enjoyed by others in connection with the housing program;
 - e. Treat anyone differently in determining eligibility or other requirements for admission¹¹;
 - f. Deny anyone access to the same level of services¹²; or
 - g. Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program.
 - h. Permit these policies to be subverted to do personal or political favors. CMHA will not offer units in an order different from that prescribed by this policy, since doing so violates the policy, federal law, and the civil rights of the other families on the waiting list.
4. CMHA shall not automatically deny admission to any group or category of otherwise qualified applicants (e.g., families with children born to unmarried parents or families whose head or spouse/co-head is a student). Each applicant in a particular group or category must be treated on an individual basis in the normal processing routine.
5. Structural Modification for 504 Compliance.
 - a. CMHA will identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all. In accordance with Section 504, and the Fair Housing Amendments Act of 1988, CMHA will make structural modifications to its housing and non-housing facilities and make reasonable accommodations in its procedures or practices to permit people with disabilities to take full advantage of CMHA's housing program and non-housing programs.
 - b. In making structural modifications to existing housing programs or in making reasonable accommodations for otherwise qualified persons with disabilities, CMHA is not required to:
 - (1) Make each of its existing facilities accessible; or make structural alterations when other methods can be demonstrated to achieve the same effect;
 - (2) Make structural alterations that require the removal or altering of a load-bearing structural member;
 - (3) Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level;
 - (4) Take any action that would result in a fundamental alteration in the nature of the program; or

⁹ The listed characteristics are considered "protected categories" as defined in Section XVII below.

¹⁰ CMHA is required to provide persons with disabilities with housing that is appropriate for their needs. This accessible or adaptable housing, although different from that provided to others, is permitted because it allows persons with disabilities to participate in the public housing program.

¹¹ CMHA is obliged to offer reasonable accommodations to applicants with disabilities, but this does not affect CMHA's screening or eligibility standards.

¹² This requirement applies to services provided by CMHA and services provided by others with CMHA's permission on public housing property.

- (5) Take any action that would result in an undue financial and administrative burden on the Authority.
- c. When CMHA is making substantial alterations as Comprehensive Modernization, working in communities with 15+ units, or work whose value exceeds 75% of the replacement cost to an existing housing facility, CMHA is not required to:
 - (1) Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level;
 - (2) Make structural alterations that require the removal or altering of a load-bearing structural member or
 - (3) Make structural alterations to meet minimum accessibility requirements where it is structurally impracticable. Structural impracticability is defined as: Changes having little likelihood of being accomplished without removing or altering a load-bearing structural member and/or incurring an increased cost of 50% or more of the value of the element of the building or facility involved. Note that the undue burdens test is not applicable to housing undergoing substantial alteration.

C. Reasonable Accommodation

1. The vision and purpose of the policy: To shape our future by utilizing sustainable funding models to develop quality affordable housing solutions in partnership with our community shareholders, CMHA must ensure that persons with disabilities have full access to CMHA's programs and services.

CMHA's reasonable accommodation policy is developed to provide all otherwise qualified applicants, residents, employees and other participants of CMHA programs or operations with equal access to all opportunities, programs and services offered by CMHA. Such access shall not be compromised by an individual's disability, unless in doing so, the nature of CMHA's programs or services would be fundamentally changed or result in undue hardship to CMHA or pose a direct threat to the health or safety of the individual or others.

CMHA asks all applicants and resident families in writing on the initial application, reexamination documents, and notices of adverse action by CMHA, if applicants and tenants require any type of accommodation.

2. Policy

2.1 Housing Programs and Services:

CMHA will provide reasonable accommodation in housing for applicants and residents with disabilities. A reasonable accommodation is a change in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program. A person with a disability may request a reasonable accommodation at any time during the application process, residency in public housing, or participation in the Housing Choice Voucher and Modern Rehabilitation programs of CMHA. The individual, CMHA staff, or any person identified by the individual must submit all requests in writing.

In accordance with CMHA's *Reasonable Accommodation's Policy*, the decision to approve or deny request for reasonable accommodation is made on a case-by-case basis and takes into consideration the disability and the needs of the individual, as well as the nature of the program or activity in which the individual seeks to participate. Reasonable accommodation methods or actions that may be appropriate for a particular program and individual may be found to be inappropriate for another program or individual.

CMHA will make available to all persons applying for residency at CMHA and to current residents, notice of the option to request a reasonable accommodation.

CMHA will encourage that requests be submitted in writing using a reasonable accommodation request form. However, CMHA will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted. If a resident requests a reasonable accommodation and does not wish to put the request in writing, the site asset manager (or other CMHA staff) should reduce the request to writing and forward to the 504 Coordinator.

The family must explain what type of accommodation is needed to provide the person with the disability full access to CMHA's programs and services. If the need for the accommodation is not readily apparent or known, the family must explain the relationship between the requested accommodation and the disability

CMHA shall designate an individual within the Office of General Counsel as the CMHA Section 504/Reasonable Accommodation Coordinator. The coordinator is responsible for monitoring CMHA's compliance with this Policy and coordinating all CMHA's efforts to comply with the various provisions of the federal, state and local law governing reasonable accommodation in housing.

The Reasonable Accommodation Coordinator should be available to CMHA applicants and residents as well as staff to answer questions and deal with issues regarding reasonable accommodation requests. The Reasonable Accommodation Coordinator shall be available to consult as needed and to provide advice to any CMHA official making a determination on a reasonable accommodation request.

C. Accessibility and Plain Language

1. Facilities and programs used by residents must be accessible to a person in a wheelchair. Application and management offices, hearing rooms, community centers, day care centers, laundry facilities, craft and game rooms must be usable by residents with a full range of disabilities. If none of these facilities are already accessible (and located on accessible routes), some¹³ must be made so, subject to the undue financial and administrative burden test.

¹³ It is not required that all public and common areas be made accessible as long as persons with disabilities have full access to all the types of facilities and activities available to persons without disabilities. Thus, not all laundry facilities need to be accessible as long as there are sufficient accessible laundry facilities for use by persons with disabilities at each property that provides laundry facilities.

2. Documents to be used by applicants and residents will be made available in formats accessible for those with vision or hearing impairments. The documents will be written simply and clearly to enable applicants with learning or cognitive disabilities to understand as much as possible. Unless prohibited by local law, documents may be translated into languages other than English as needed¹⁴.
3. Some aspects of eligibility, rent computation, applicant screening, reasonable accommodations, and lease compliance are complicated, but CMHA will present examples to help applicants and residents understand the issues involved. In writing materials for applicants and residents, CMHA staff will keep in mind that intellectual disability, learning disabilities and cognitive disabilities may affect the applicant's ability to read or understand – so rules and benefits may have to be explained verbally, perhaps more than once.
4. At the point of initial contact with all applicants, CMHA staff will ask whether they need some form of communication other than plain language paperwork. Alternative forms of communication might include: sign language interpretation; having materials explained orally by staff, either in person or by phone; large type materials; having someone (friend, relative or advocate) accompany the applicant to receive, interpret and explain housing materials; permitting applicants to file applications by mail; and permitting alternative sites for application taking.
5. Some applicants will not be able to read (or to read English), so intake staff must be prepared to read and explain anything that they would normally hand to an applicant to be read or filled out. Applicants who read or understand little English may request an interpreter who can explain what is going on. CMHA is required to pay the costs associated with having a foreign language interpreter as they are for a sign language interpreter for the deaf and hard of hearing.
6. At a minimum, CMHA will prepare the following information in plain-language accessible formats:
 - a. Marketing, promotional and informational materials;
 - b. Information about the application process;
 - c. How rents and utility allowances are determined;
 - d. The application form and required certifications;
 - e. All form letters and notices to applicants and residents;
 - f. General statement about reasonable accommodation;
 - g. Orientation materials for new residents;
 - h. The lease and house rules, if any;
 - i. Guidance or instructions about care of the housing unit;
 - j. Information about opening, updating or closing the waiting list;
 - k. All information related to applicant's rights (to informal hearings, etc.)

The Family Self Sufficiency Program under CMHA's Public Housing Program will work with participating families to identify their strengths and barriers. Together they will establish goals that lay the foundation for the families to achieve economic self-sufficiency.

FSS PROGRAM OBJECTIVES

The overall plan of the FSS Program is to achieve the following objectives:

- Introduce FSS to all families who are eligible to participate with the understanding that the commitment to change "begins from within."
- Implement a needs assessment to identify each family's strengths and barriers. Establish interim goals that lay the foundation for the final goals of economic self-sufficiency of each family joining FSS.
- CMHA's standards for completion of the FSS Contract of Participation include:
 - To become independent of TANF assistance and remain independent for 12 consecutive months before the FSS Contract expires; To seek and maintain suitable employment based on the skills, education and job training of that individual and available job opportunities in the area;
 - To complete the Individual Service Plan goals set by the participant.
- Establish interagency partnerships to achieve high quality and comprehensive service delivery to all members of a family with long-term results.

The FSS Coordinators will meet with the FSS participants on an annual basis to review goals and to assess the accountability of the families and the agencies involved but will contact the participant throughout the year to ensure any potential issues are resolved or assistance is provided prior to the expiration of the Contract of Participation.

FAMILY OBJECTIVES

The overall plan for the family participating in FSS is to achieve the following objectives:

Begin to recognize the connection between self-perceptions and self-imposed limitations. By learning that thoughts can shape and form one's life, the prescription for success is to "begin within."

Achieve a greater level of self-discipline, self-esteem and self-motivation by accepting responsibility for decisions and actions.

Demonstrate commitment and accountability to the Individual Training and Services Plan in which both goals and barriers are assessed.

¹⁴ 24 CFR § 5.505 requires that any notice or document relating to citizen or eligible immigration status, where feasible, be provided to an applicant or tenant in a language that is understood by the individual if the individual is not proficient in English. In general, documents will be translated when there are sufficient numbers of applicants or residents speaking a language to warrant the expense.

OUTREACH PROCEDURES

Recruiting must remain an ongoing effort. FSS is not a one time "take it or leave it" offer. The entire staff is encouraged to promote FSS during daily contact with families. FSS staff will conduct outreach that will provide Asset Management program participants information and an opportunity to participate with the FSS program.

RECRUITMENT OF PARTICIPANTS

After the initial Briefing that offers FSS, the Housing Specialist will also offer FSS to every Asset Management resident during his/her initial enrollment, recertification, interim, and/or transfer. Family Self- Sufficiency staff will explain the benefits of the program to each potential FSS participant who wishes to meet with FSS staff to learn more about the program. The FSS program, will also be explained to interested Asset Management Program residents who call and express an interest in learning more about the program. If the tenant desires to enroll in the program, he/she will meet with a Family Self Sufficiency staff person to complete the Family Self-Sufficiency Assessment Form. The FSS Contract will be explained and completed during the face-to-face interview. The FSS staff will attend various community events providing information about the program including holding monthly informational sessions for Asset Management residents.

NETWORKING IN THE COMMUNITY

An FSS program goal is to serve as a connector for families to available community services rather than to serve in the role of traditional case manager. For this reason, it is important to develop a support network of those agencies that have the common purpose of providing supportive services to enable families to achieve self-sufficiency.

ACTIVITIES

In furtherance of both FSS recruiting and networking efforts, FSS will participate in a variety of community activities that promote the concept of FSS.

PROGRAM COORDINATING COMMITTEE (PCC)

OhioMeansJobs Cincinnati, formerly Super Jobs is the designated one-stop service delivery provider for the Workforce Investment Act (WIA) services for Cincinnati and Hamilton County. Our participation in this group is beneficial to both our families and to FSS staff. We are able to build relationships with local agencies and job providers. This connection allows us to more effectively refer FSS participants to supportive services and job opportunities that help families to achieve their self-sufficiency goals. Participation in OhioMeansJobs meetings also serves as our Program Coordinating Committee. We regularly send a representative from FSS to attend these meetings.

COORDINATION OF SERVICES

Services and activities under the FSS Program will be coordinated with relevant community services (including training, education and childcare) in order to avoid duplication of services and activities.

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 Public Housing Programs on the basis of any protected category. To further its commitment to full compliance with applicable Civil Rights laws, CMHA will provide Federal/State/local information to families 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 family briefing packet and available upon request at the Asset Management reception desk.

All Housing Authority staff are 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 deaf and hard of hearing is provided by Cincinnati Bell by dialing 1-800-545-1833.

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 deaf and hard of hearing 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

RECORDS FOR MONITORING CMHA PERFORMANCE

In order to demonstrate compliance with HUD and other pertinent regulations, CMHA will maintain records, reports and other documentation in accordance with HUD requirements and in a manner that will allow an auditor, housing professional or other interested party to follow, monitor and/or assess CMHA's operational procedures objectively and with accuracy and in accordance with SEMAP requirements with internal supervisory audits.