

5-Year PHA Plan (for All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 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, 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-50075-5Y** is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.
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A.1 **PHA Name:** Cincinnati Metropolitan Housing Authority **PHA Code:** OH-004
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2025
The Five-Year Period of the Plan (i.e. 2019-2023): 2020-2025
PHA Plan Submission Type: 5-Year Plan Submission Revised 5-Year Plan Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)

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:					

B.	Plan Elements. Required for <u>all</u> PHAs completing this form.
B.1	<p>Mission. State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.</p> <p>CMHA Mission Statement:</p> <p>To be a leader in the housing industry by providing exceptional housing opportunities while achieving high levels of customer satisfaction, promoting self-sufficiency and neighborhood stability, and being a long-term asset to the community. We will achieve this by developing public/private partnerships, creating entrepreneurial opportunities and by employees and residents holding themselves to our Gold Standard of Excellence.</p>

B.2

Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

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.
10. Implement green and sustainable housing initiatives such as net/near zero, enterprise green and LEED.
11. Continue to further fair housing throughout Hamilton County.
12. Continue to work towards improving residents' self-sufficiency through the Envision centers
13. Increase broadband internet access throughout the agency for all residents

14. Review and update all lease agreements and house rules
15. Continue to preserve affordable housing throughout Hamilton County
16. Work toward strengthening relationships with the City of Cincinnati.
17. Work toward strengthening relationships with Hamilton County.
18. Strengthen partnerships with community groups
19. Continue to strengthen partnerships to preserve current housing and develop additional affordable housing throughout the community.
20. Complete the first phase on Winton Terrace
21. Increase resident owned business participation through our transformation plans
22. Increase MBE, WBE and Section 3 business participation
23. Develop criteria for preserving and developing current and new affordable housing
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.
25. Seek and utilize other sources of funding such as New Markets, Congressional EDI funding, etc....

B.3

Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Progress Report:

Accomplishments:

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

B.4

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

During calendar year 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.

Changes to Policy in 2025:

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 crimes¹ or extreme harassment; **or to witnesses of crimes,² or to victims of**

domestic violence, dating violence, stalking, or sexual assault ³, 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.

- **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

See documents attached:

**VAWA Emergency Transfer Plan
Notice of Occupancy Rights under the Violence Against Women Act 24**

C. Other Document and/or Certification Requirements.

C.1

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

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 resulted 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 – Rental Assistance Demonstration (RAD):

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.

<p>C.2</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year 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 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>The document is out for a 45 day public comment period that expires on Friday, March 7, 2025.</p>
<p>C.3</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 section is being reviewed by State and Local Officials</p>
<p>C.4</p>	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) 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>D.</p>	<p>Affirmatively Furthering Fair Housing (AFFH).</p>

D.1

Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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 for people with disabilities.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the 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 are kept informed of the importance of affirmatively furthering fair housing and providing equal opportunity for all families.

Affirmatively furthering fair housing includes providing reasonable accommodations for 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 for 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 citizenship⁴ 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 housing that is different from that provided others⁵;
 - 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 admission⁶;
 - f. Deny anyone access to the same level of services⁷; 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 The listed characteristics are considered “protected categories” as defined in Section XVII below.

⁵ 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.

⁶ CMHA is obliged to offer reasonable accommodations to applicants with disabilities, but this does not affect CMHA’s screening or eligibility standards.

⁷ This requirement applies to services provided by CMHA and services provided by others with CMHA’s permission on public housing property.

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
 - (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), some⁸ must be made so, subject to the undue financial and administrative burden test.
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 needed⁹.
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 the 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.

⁸ 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.

⁹ 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.

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.

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.