

## FY2025-2026 Proposed Administrative Plan – Significant Amendment - 2

### Chapter 4 – Addition – COMMENT (Received 11/24/2025)

#### B. LOCAL PREFERENCES [24 CFR 982.207]

CMHA will offer public notice when changing its preference system and the notice will be publicized using the same guidelines as those for opening and closing the wait list. Applicants must claim eligible preference(s) at the time of application to the wait list.

Except for Special Admissions, applicants for Housing Choice Voucher Program assistance will be taken from the Housing Choice Voucher Program wait list in order of the following local preferences:

- Families that have been designated as eligible for assistance under HUD's Disaster Housing Assistance Program (DHAP). **\*\*50 points**
- Referrals of disabled persons referred by Living Arrangements for the Developmentally Disabled (LADD) up to 150 referrals. **\*\* 35 points**
- Referrals of disabled persons referred by the Independence Alliance formerly known as Center for Independent Living Options (CILO) up to 75 referrals. **\*\*35 points**
- HUD funded Family Unification Program (FUP) Voucher. **\*\*35 points**
- Canceled voucher preference for applicant families whose vouchers were recalled due to insufficient funding. **\*\*75 points**
- Displaced preference for voucher families who have been terminated from the program as a result of insufficient funding. **\*\*95 points**
- Displaced preference for Asset Management/LIPH families in a hard to house situation, RAD conversion of AM/LIPH unit or due to demo/disposition of units. **\*\*80 points**
- Referral from Asset Management/LIPH or Touchstone Management Services when a family or individual cannot be housed because of extenuating circumstances. **\*\*80 points**
- Referrals from Touchstone Properties for Hamilton County Affordable Housing units when a family or individual cannot be housed because of extenuating circumstances. **\*\*85 points**
- Referrals for families who are at risk of becoming homeless due to unforeseen conditions because of residing in a condemned/unhabitable building or unanticipated rent affordability increase. Referrals can come from but not limited to property management companies, developers, or any partnering service provider, up to 100 referrals per calendar year, and would be at the discretion of CMHA. **\*\*70 points**
- Referrals for Temporary and/or Permanent Relocation assistance from Asset Management Services, RAD or Non-RAD units. **\*\*80 points**

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- Has attained at least 18 years and not more than 24 years of age;
- Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 or older; and
- Is homeless <sup>(1)</sup> or is at risk of becoming homeless<sup>(2)</sup> **\*\*40 points**

<sup>(1)</sup> **Homeless** refers to the population included in the definition of this term at 24 CFR 578.3. <sup>(2)</sup> **At Risk of Becoming Homeless** means the population defined as "At Risk of Homelessness" at 24 CFR 576.2.

\*\*\* This preference is for the Summit Apts., Chapel, Grand, Mt. Auburn, Oak and Parkway Place PBV wait list only.

\*\*\*\* Referrals will be accepted from CMHA Special Admissions, Hamilton County Reentry, Mainstream, Asset Management/LIPH, Touchstone Management Service, Asset Management Services, Relocation, DHAP, HUD funded FUP, Youths aging out of foster care FUP, Foster Youth Independence Initiative; LADD, HUD VASH, Strategies to End Homelessness, Independence Alliance formerly known as CILO, property management companies, new property owners, developers, and Cincinnati Public Schools regardless of whether a family is on the regular voucher wait list, regardless of whether the regular CMHA tenant based voucher wait list is open or closed, consistent with 24CFR 982.206 (c).

CMHA will admit families who qualify under the Extremely Low-Income limit to meet the income-targeting requirement, regardless of preference.

C. **SPECIAL ADMISSIONS [24 CFR 982.54(d)(e),982.203]**

CMHA admits a limited number of families under a Special Admissions procedure. Special Admissions families will be admitted outside of the regular wait list process. They do not have to qualify for any preferences, nor are they required to be on the program wait list. CMHA maintains separate records of these admissions.

The following are examples of types of program funding that may be designated by HUD for families living in a specified unit:

- A family displaced because of demolition or disposition of a public or housing project.
- A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project.
- For housing covered by the Low-Income Housing Preservation and Resident Home-ownership Act of 1990.
- A family residing in a CMHA owned property converted to RAD under Choice Mobility.
- A family residing in a project covered by a Project-Based Housing Choice Voucher Program HAP Contract at the end of the initial HAP Lease/Contract term; and

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F. **ORDER OF SELECTION [24 CFR 982.207(e)]**

CMHA's method for selecting applicants from a preference category leaves a clear audit trail that can be used to verify that each applicant has been selected in accordance with the method specified in the Administrative Plan.

**Local Preferences**

Local preferences will be used to select families from the wait list. Households may qualify for more than one preference and will receive the points for each. CMHA has selected the following system to apply local preferences:

- Families that have been designated as eligible for assistance under HUD's Disaster Housing Assistance Program (DHAP). **\*\*50 points**
- Referrals of disabled persons referred by Living Arrangements for the Developmentally Disabled (LADD) up to 150 referrals. **\*\*35 points**
- Referrals of disabled persons referred by the Independence Alliance formerly known as Center for Independent Living Options (CILO) up to 75 referrals. **\*\*35 points**
- HUD funded Family Unification Program (FUP) Voucher. **\*\*35 points**
- Emergency Housing Voucher (EHV). **\*\*90 points**
- Canceled voucher preference for applicant families whose vouchers were recalled due to insufficient funding. **\*\*75 points**
- Displaced preference for voucher families who have been terminated from the program as a result of insufficient funding. **\*\*95 points**
- Displaced preference for Asset Management/LIPH families in a hard to house situation, RAD conversion of AM/LIPH unit or due to demo/disposition of units. **\*\*80 points**
- Referral from Asset Management/LIPH or Touchstone Management Services when a family or individual cannot be housed because of extenuating circumstances. **\*\*80 points**
- Referral from Touchstone Properties for Hamilton County Affordable Housing units when a family or individual cannot be housed because of extenuating circumstances. **\*\*85 points**
- Referrals for families who are at risk of becoming homeless due to unforeseen conditions because of residing in a condemned/unhabitable building or unanticipated rent affordability increase. Referrals can come from but not limited to property management companies, developers, or any partnering service provider, up to 100 referrals per calendar year, and would be at the discretion of CMHA. **\*\*70 points.**

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- o 475(5)(H) of the Social Security Act at age 16 or older; and
- o Is homeless<sup>[1]</sup> or is at risk of becoming homeless<sup>[2]</sup> **\*\*40 points**

<sup>[1]</sup> **Homeless** refers to the population included in the definition of this term at 24 CFR 578.3. <sup>[2]</sup> **At Risk of Becoming Homeless** means the population defined as "At Risk of Homelessness" at 24 CFR 576.2.

\*\*\* This preference is for the Summit, Oak Street, Mt. Auburn, Walnut and Parkway Apts. Project-based Voucher wait list only.

\*\*\*\* Referrals will be accepted from CMHA Special Admissions, Hamilton County Reentry, Mainstream, Asset Management/LIPH, Touchstone Management Services, Hamilton County Affordable Housing managed by Touchstone Properties, Asset Management Services, Relocation, DHAP, HUD funded FUP, Youths aging out of foster care FUP, Foster Youth Independence Initiative; LADD, HUD VASH, Strategies to End Homelessness, Independence Alliance formerly known as CILO, property management companies, developers, and Cincinnati Public Schools regardless of whether a family is on the regular voucher wait list, regardless of whether the regular CMHA tenant based voucher wait list is open or closed, consistent with 24 CFR 982.206 (c).

CMHA will admit families who qualify under the Extremely Low-Income limit to meet the income-targeting requirement, regardless of preference.

G. **FINAL VERIFICATION OF PREFERENCES [24 CFR 982.207]**

CMHA will verify that a family claiming an applicant preference qualifies for the preference based on the family's circumstances.

The family must also qualify for the claimed preference(s) at the time of application to the wait list.

If verification results in a change of preference status, the applicant will be notified of their failure to qualify for the preference. The preference will be removed and the family placed back on the wait list in the appropriate order.

H. **SPECIAL PROGRAMS**

CMHA will maintain a separate wait list for its Moderate Rehab, NED2, Mainstream each Project Based Voucher Projects, PBV Choice Mobility, and RAD Choice Mobility. Referrals will be received for these programs in accordance with program regulations. Applicants will be ranked according to date and time of referral, unless a preference is indicated above.

- **Choice Mobility Wait List:** If the Voucher Inventory Turnover or Project Turnover Cap is reached, CMHA will create and maintain a waiting list in the order in which the requests from eligible households were received. Families will be issued vouchers in a ratio of up to 10 requests pulled per 50 families drawn from the HCV Tenant Based wait list.

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The open period shall be long enough to achieve a wait list adequate to cover projected turnover and new allocations over the next 12 months or longer. When the period for accepting applications is over, CMHA will add those new applicants to the wait list in accordance with the procedure detailed in the chapter of this Administrative Plan titled "Establishing Preferences and Maintaining the Wait List."

\*\*\*\* Referrals will be accepted from CMHA Special Admissions, Hamilton County Reentry, NED2, EHV, Mainstream, Asset Management/LIPH, Asset Management, Touchstone Services and Hamilton County Affordable Housing managed by Touchstone Properties. Relocation, DHAP, HUD funded FUP, Youths aging out of foster care FUP, Foster Youth Independence Initiative; LADD, HUD VASH, Strategies to End Homelessness, Independence Alliance formerly known as CILO, property management companies, developers, and Cincinnati Public Schools regardless of whether a family is on the regular voucher wait list, regardless of whether the regular CMHA tenant based voucher wait list is open or closed, consistent with 24 CFR 982.206 (c).

C. "INITIAL" APPLICATION PROCEDURES [24 CFR982.204(b)]

CMHA will utilize a pre-application. The information is to be completed by the applicant whenever possible. To provide specific accommodation for persons with disabilities, the information may be completed by an agency, family member or other person provided permission to do so on behalf the applicant.

The purpose of the pre-application is to determine preliminary rank on the wait list. The pre-application will contain at least the following information:

- Applicant name(s).
- Complete mailing address of the applicant family.
- Family unit size (number of bedrooms per CMHA subsidy standards).
- Date and time of application.
- Qualification for any local preference.
- Racial and ethnic designation of the head of household.
- Annual (gross) family income.
- Social Security Numbers of family members; and
- Birth dates of family members.

Pre-applications will not require an interview. The information on the pre-application will not be verified until the applicant has been selected from the wait list. Final eligibility will be determined when the full application process is completed, and all information is verified.

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**Displaced preference for Asset Management/LIPH families in a hard to house situation due to demo/disposition of units:** This preference applies to families residing Asset Management/LIPH units that are in need of a 4 or more-bedroom unit. This preference requires a documented referral from CMHA's Asset Management program.

**Referrals for Temporary and/or Permanent Relocation Assistance from Asset Management Services RAD or Non-RAD unit.** This preference is for temporary or permanent relocation assistance. This preference requires a documented referral from CMHA's Asset Management Services or CMHA's Relocation Department.

**Referral from Asset Management/LIPH or Touchstone Management Services when a family or individual cannot be housed because of extenuating circumstances:** This preference applies to families residing in or applying for Asset Management/LIPH or Touchstone units that cannot be housed by the program because of extenuating circumstances as determined by CMHA. Extenuating circumstances can be but not limited to the threat of health, safety or structure; witness to or victim of a crime; etc. This preference requires a documented referral from CMHA's Asset Management program.

**Referral from Touchstone Management Services for Hamilton County Affordable Housing when a family or individual cannot be housed because of extenuating circumstances:** This preference applies to families residing in at Hamilton County Affordable Housing Units managed by Touchstone Properties that cannot be housed by the program because of extenuating circumstances as determined by CMHA. Extenuating circumstances can be but not limited to the threat of health, safety or structure; witness to or victim of a crime; etc. This preference requires a documented referral from Touchstone Properties for Hamilton County Affordable Housing units.

**Referrals for families who are at risk of becoming homeless due to unforeseen conditions because of residing in a condemned/unhabitable building or unanticipated rent affordability increase.** Referrals can come from but not limited to property management companies, developers, or any partnering service provider. **up to 100 referrals per calendar year, and would be at the discretion of CMHA. \*\*70 points.**

**Displaced preference for families who are on the Emergency Housing Voucher (EHV) program** – CMHA is transitioning the Emergency Housing Voucher participants to the HCV tenant-based voucher program due to HUD sunsetting the program earlier than expected

**Referral from the Local Homeless Coalition:** This preference applies to an individual or family, referred to CMHA by the local Homeless Coalition, who lacks a fixed, regular, and adequate nighttime residence, or needing assistance for homelessness prevention. Meaning but not limited to:

## Chapter 10 – Addition

### CHAPTER 10

#### Tenancy Approval and Contract Execution

[24 CFR 982.302]

##### PHILOSOPHY

CMHA's program operations are designed to utilize available resources in a manner that is efficient and provides eligible families timely assistance based on the number of units that have been budgeted. CMHA's objectives include maximizing HUD funds by providing assistance to as many eligible families and for as many eligible units as the budget will allow.

##### POLICY

After families are issued a voucher, they may search for a unit anywhere within the jurisdiction of CMHA, or outside of CMHA's jurisdiction if they qualify for portability. The family must find an eligible unit under the program rules, with an owner/landlord who is willing to enter into a Housing Assistance Payments (HAP) Contract with CMHA. The family must submit a *Request for Tenancy Approval* (RTA) executed by both the landlord and the family to CMHA for units to be considered for participation in the HCV Program using the online RFTA Portal.

This chapter defines the types of eligible housing, CMHA's policies which pertain to initial inspections, lease requirements, owner disapproval, and the processing of RTA.

##### A. REQUEST FOR TENANCY APPROVAL [24 CFR 982.302, 982.305(b)]

CMHA will complete a criminal background check on all adult family members age 18 years old and over at annual recertification or when any new family members over 18 is added to the household. When conducting the criminal background check, CMHA will not consider a time period in excess of three years for the following:

- Other criminal activity which may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity;
- Other criminal activity which may threaten the health or safety of the owner, property management staff, or persons performing a contract administration function or responsibility on behalf of CMHA, including CMHA employee or contractor, subcontractor or agent.

CMHA may deny assistance to move or terminate program assistance, if any family member is engaged in criminal or drug related activity or has engaged in other related program violations. Please refer to Chapter 16 "Denial of Termination of Assistance."

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The initial inspection shall not be used by an owner to create a checklist or work order to prepare the unit for an inspection. The unit must be HQS/NSPIRE V compliant at the time the RTA is submitted for processing. If the unit fails the initial HQS/NSPIRE V inspection, the owner will be advised to notify CMHA once repairs are completed. CMHA will not schedule a reinspection until notified by the owner/agent that the deficiencies have been corrected.

On an initial inspection, the owner will be given 15 days to correct the items noted as a Fail and to contact CMHA to schedule a reinspection. Depending on the amount and complexity of work to be done, additional time may be granted, if requested by the owner. If the repairs are not completed or cannot be completed within 15 days, the request for tenancy approval will be canceled and the tenant will need to submit a new Request for Tenancy Approval to CMHA.

CMHA schedules the initial inspection directly with the owner/representative. It is the expectation that the owner or designated representative will be present for the inspection. CMHA will make two attempts to inspect the unit before the RTA is canceled.

CMHA reserves the right to make a determination during an initial inspection on rather or not the unit is "ready" for an inspection. If more than 12 deficiencies are found on an initial inspection, the inspection will be discontinued and the unit deemed "not ready". The owner will be responsible for utilizing the checklist and any additional resources available to ensure that the unit is made completely ready for an inspection. The owner should then contact CMHA to schedule another inspection. Since the unit was marked as not ready for the inspection, the owner shall be advised that a complete inspection was not performed and as such additional items can be cited on the reinspection of the unit.

CMHA's HQS/NSPIRE V determinations on initial inspections are not subject to appeal. CMHA may review discrepancies and inconsistencies regarding a failed item. Owners may contact the Manager of Owner Compliance with any issues. The Manager of Owner Compliance will review the matter and take appropriate action to address the issue.

### C. BIENNIAL HQS/NSPIRE INSPECTIONS [24 CFR 982.405(a)]

CMHA conducts an inspection in accordance with Housing Quality Standards/ NSPIRE V at least once every 24 months, as required by program rules. CMHA will conduct complaints, quality control or special inspections. Special inspections may be scheduled more frequently. Family determined responsible failed items will not be held against the owner and HAP will not be abated for unit failing with no owner responsible items.

HQS/NSPIRE V deficiencies, which cause a unit to fail, must be corrected by the owner unless it is a fail item for which the tenant is responsible for correcting.

The owner and the family must allow CMHA to inspect the unit at reasonable times with reasonable notice. It is the tenant's responsibility to ensure that the unit can be

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accessed for the inspection. The owner may be present for the inspection; CMHA will notify the family and owner, in writing or verbally, of the date and time of the inspection.

**Inspection:** The family and owner are notified of the date and time of the inspection appointment by either US mail, the landlord portal or via email. As of January 1, 2026, CMHA will cease the use of US mail for inspection appointments and to send inspection results. It is the responsibility of each party to ensure that CMHA has the correct email address for inspection notifications and to access the electronic portal for inspection results.

If the tenant misses three inspection appointments for the same inspection occurrence, CMHA may move to terminate assistance to the family.

**Re-inspection:** The family and owner are notified of the re-inspection of appointment date and time by CMHA. CMHA will make every attempt to schedule the re-inspection on or within 5 days of the due date for repairs. If the re-inspection date is scheduled by CMHA after the due date, CMHA will assume repairs were made timely as long as the unit passes the re-inspection and documentation can be provided that the repairs were made prior to the due date.

Regardless of the date of the reinspection, with supporting date-stamped documentation from the owner, showing when the repairs were made. Acceptable documentation will include date stamped photos of the repair, receipts for the material used to make the repair, work orders, invoices from contractors that made the repairs, etc. Under this situation the abatement will be canceled or ended in accordance with the documentation and payments issued to owner. If the owner is unable to provide supporting documentation to document the date of repairs, the abatement will end the day before the unit passes the reinspection.

If neither the owner nor the family is present for the re-inspection appointment, a notification of the missed inspection will be left at the unit and HAP abatement will occur once the "due date" for repairs expires. Once a unit goes into abatement because the owner's failure to make repairs, the family will be issued a voucher and allowed to submit a RTA to CMHA for another unit, if there are no outstanding family responsible items. If the RTA is submitted prior to CMHA verifying the repairs, the family will be allowed to move regardless of the lease end date. If the owner makes the repairs and corrects the deficiencies prior to the family submitting a RTA, the family will be allowed to move, with proper notification to the owner of their intent to vacate, if they are in a month-to-month tenancy. If the family is not in a month- to month-tenancy, they will be required to remain in the unit until the completion of the lease term.

Upon request, CMHA will schedule another re-inspection of the unit, if no RTA has been submitted by the family.

A pattern of repeated non-compliance with the inspection process may result in suspension or termination of an owner and/or tenant. Non-compliance includes failure to make the unit accessible for a scheduled inspection, failure to make

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### E. EMERGENCY INSPECTIONS

Emergency inspections are complaint inspections conducted when the complaint involves an exigent situation that endangers the family's health or safety (see "Emergency Repair Items"). CMHA **may** inspect the unit within 24 hours upon receipt of notification of the emergency situation. If the condition is life-threatening, CMHA will require the owner or family to make the repair or correct the deficiency within 24 hours. CMHA will accept self-certification of the repair and physically confirm the repairs were completed through a reinspection of the unit.

### F. QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b)]

Quality Control inspections will be performed by the Owner Compliance Manager or their designee on the number of files required by SEMAP. The purpose of Quality Control inspections is to ascertain that each inspector is conducting accurate and complete inspections, and to ensure that there is consistency among inspectors in application of the HQS/NSPIRE V.

The sampling of files will include recently completed inspections (within the prior 3 months), a cross-section of neighborhoods, and a cross-section of inspectors.

The family and owner are notified of the date and time of the inspection appointment. If neither the family nor the owner is able to be present, the tenant is responsible for rescheduling the appointment at least 48 hours prior to the scheduled inspection time.

If the tenant does not contact CMHA to reschedule the inspection, or if the tenant misses two inspection appointments, CMHA may terminate assistance to the family.

**Re-inspection:** The family and/or owner are notified of the re-inspection of failed items appointment date and time by CMHA. CMHA will make every attempt to schedule the re-inspection on or before the due date for repairs. If the re-inspection date is scheduled by CMHA after the due date, CMHA will assume repairs were made timely as long as the unit passes the re-inspection.

If neither the owner nor the family is present for the re-inspection appointment, a notification of the missed inspection will be left at the unit and HAP abatement may occur once the "due date" for repairs expires.

Once a unit goes into abatement, the family will be allowed to submit a RTA to CMHA for another unit, if there are no outstanding family responsible items. If the RTA is submitted prior to CMHA verifying the repairs, the family will be allowed to move. If the owner makes the repairs and corrects the deficiencies prior to the family submitting a RTA, the family will be allowed to move, with proper notification to the owner, if they are in a month-to-month tenancy. If the family is not in a month-to-month-tenancy, they will be required to remain in the unit until the completion of the lease term.

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"weather related" extension. The repairs for these items must be completed by May 15<sup>th</sup> following the inspection date. CMHA will schedule a "special" inspection to verify the repairs of these items. Since the work is exterior and CMHA will not need to access the interior, the work will be verified by an inspector without additional notice to the parties. No additional extensions will be granted for weather-related repairs. All other cited deficiencies not indicated as a "weather extension" must be corrected by the due date listed on the failed inspection notice to avoid abatement of HAP.

CMHA may also conduct a special inspection to verify unit information such as bedroom sized, utility meters, amenities, unit type and size, etc.

### I. ACCEPTABILITY CRITERIA AND EXCEPTIONS TO HQS/NSPIRE V [24 CFR 982.401(a)]

CMHA adheres to the acceptability criteria in the program regulations and CMHA's HQS/NSPIRE V Guidebook and Checklist. A partial list of general criteria is described below. The HCV HQS/NSPIRE Guidebook and Checklist provides further acceptable criteria.

For inspections that occur on or after January 1, 2025, the presence of an unvented, fuel-burning space heater will be considered a failed item under HQS/NSPIRE/NSPIRE that the owner must correct in accordance with regulatory requirements and CMHA-established timeframes. If the owner doesn't correct the deficiency within the required timeframes, CMHA must abate HAP and enforce the owner obligations in accordance with program requirements in 24 CFR 982.404.

#### **Additions**

**Smoke Detectors:** Owners are responsible for providing working smoke detectors. Tenants are responsible for replacing old batteries for battery powered units. Effective January 1, 2025 smoke detectors must be hard wired or have a 10-year sealed battery.

**Windows:** All windows shall be fully supplied with window glass that is glazed. Windows shall have sashes in good condition that fit reasonably well within frames and are capable of being easily opened and held in position by hardware, including window locks, on all floors of the unit. Windows will be maintained to prevent inclement weather from entering the structure. Windows must be free from cracks, missing/broken panes, with no more than 10% moisture between panes that impedes the view. Windows must open and close properly. If window security bars or security screens are present on emergency exit window, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.

**Basement or cellar hatchways** shall be so constructed and maintained as to prevent the entrance of rodents, rain and surface drainage into the dwelling. Basement or cellar hatchways must be secured with latch or lock.

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Reasons for an extension may include, but are not limited to:

- An unavoidable delay in completing repairs due to difficulties in obtaining parts or contracting for services;
- Delays due to climate conditions;
- Complexity or extensive nature of repairs which make it impossible to complete the repairs by the original due date;
- Serious illness, death, etc.

The request for an extension must be made in writing with an extension form request to the Owner Compliance Manager prior to the due date for repairs. **All requests must have 3rd party documentation to support the extension need to be considered for approval (except for weather related requests).**

For conditions that are life-threatening, the PHA cannot grant an extension to the 24-hour corrective action period.

### Termination of Contract

CMHA will may terminate the HAP Contract when an owner fails to correct all the deficiencies cited and the unit final fails the inspection process within 90 days of the effective abatement date. CMHA may also terminate a contract after it has made 3 attempts to conduct an inspection without entry to the unit. While the family is in possession of the unit and responsible for allowing entry, CMHA strongly encourages owners to also ensure that CMHA is able to conduct the required inspection timely to avoid placement of an abatement or cancelation of the HAP contract. If a unit is under abatement prior to the effective date of the contract termination, the abatement will remain in effect until ended.

If repairs are completed before the effective termination date, the termination may be rescinded by CMHA if the tenant chooses to remain in the unit. Only one Housing Quality Standards inspection will be conducted after the termination notice is issued.

If a unit fails 2 consecutive reinspections for non-emergency items, on a unit, the result will be a final fail that may lead to termination of the HAP Contract as stated above. If a unit falls into this status, the family will need to submit a new Request for Tenancy Approval if they would like to remain in the unit. The unit will be subject to a new initial inspection and the owner will need to enter into a new HAP Contract for the unit. HCV Management or their designee can make an exception to this requirement for extenuating circumstances.

Once a unit final fails an inspection, CMHA will not conduct any further reinspections without the submittal of a new RTA to start a new HAP Contract. Any open remaining reinspections will be cancelled accordingly until a new RTA is submitted.

CMHA may review HQS/NSPIRE V discrepancies and inconsistencies regarding a failed item. Owners may contact the Owner Compliance Manager with any issues. The Manager of Inspections will review the matter and take appropriate action to address the issue.

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For any family member whose income is determined pursuant to a streamlined income determination, CMHA will obtain third-party verification of all income amounts upon admission into the program, upon initial receipt and every 3 years thereafter.

CMHA produces a monthly listing of units under contract to ensure that timely reviews of housing quality and factors related to total tenant payment/family share can be made.

### B. ANNUAL /REEXAMINATION [24 CFR 982.516]

Families are required to be recertified at least annually.

#### Moves Between Reexaminations

When families move to another dwelling unit, CMHA will process a transfer certification, "Other Change of Unit" and will not change the family's recertification anniversary date. If the family is due for an annual, the transfer will be processed as an annual certification. The RTA will be processed using the current household income verified and on file for the family. Families will not be allowed to randomly add or remove sources of income (i.e., regular contributions, temporary employment income) in order to qualify for a unit (also known as "income shopping").

#### Reexamination Notice to the Family

CMHA will maintain a reexamination tracking system and the participant family will be notified by **US** mail, electronically ~~and~~ or email of the need to complete their recertification 90 days in advance of the anniversary date. If requested as a reasonable accommodation by a person with a disability, CMHA will provide the notice in an accessible format. CMHA will also email the notice to a third party, if requested as reasonable accommodation for a person with a verified disability. All adult household members age 18 and over are required to complete the recertification in the manner determined by CMHA. If the participant family contains a minor who will reach maturity prior to the effective date of the annual certification, the certification date may be delayed.

Income limits are not used as a test for continued eligibility at recertification.

#### Procedure

CMHA's procedure for conducting annual recertifications will be:

- To contact the family to alert them of the need to recertify and the documents needed with a due date to provide the information to the office. CMHA will provide an online recertification packet to be completed and method(s) to submit to submit the information.
- If the family fails to submit the recertification information and verifications to CMHA by the initial due date, a second request for the information will be made.

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- If the family fails to provide the necessary documents and verifications after the 3<sup>rd</sup> and final request, the family may be proposed for termination from the program with a right to [a hearing](#). CMHA may elect to have a family recertify in person, via mail, electronically thru CMHA's resident portal, or other method.

Exceptions to this procedure may be made by HCV Management.

### Completion of Annual Recertification

It is CMHA's goal to have all recertifications for families completed before the anniversary date. This includes notifying the family of any changes in rent at least 30 days before the effective date of the change in the family's rent change.

### Persons with Disabilities

Persons with disabilities who are unable to complete the recertification [online](#), [packet](#), [will](#) [may](#) be granted [an accommodation](#) by conducting the interview, by mail, or [other manner](#) [home visit](#), upon verification that the accommodation requested meets the need presented by the disability. [The accommodation must be requested prior to the due date of the recertification.](#)

### Collection of Information [24 CFR 982.516(f)]

CMHA has established appropriate recertification procedures necessary to ensure that the income data provided by families is complete and accurate.

CMHA will allow the family to complete the recertification form.

CMHA will require the family to complete an Application for Continued Assistance prior to all recertification interviews.

### Failure to Respond to Notification to Recertify

If the family does not complete and submit the recertification packet and all requested verifications to CMHA by the due [date](#) [or](#) has not made prior arrangements with CMHA to return the information [at a later date](#), CMHA may propose the family for termination of assistance from the HCV program after 3 attempts to obtain the information. If proposed for termination, the family will be offered the opportunity to request a hearing. Exceptions to these policies may be made by the HCV Management staff or designee.

### Documents Required from the Family

In the notification to the family, CMHA will include instructions for the family to submit the following:

- Documentation of all assets with a net value greater than \$5,000 Self-Certification/Declaration of assets with a net value up to \$5,000

## Chapter 13 – Addition/Removal (Provide Clarity)

### Interim Reexamination Policy (Pre-HOTMA)

CMHA will not process interim reexaminations when families have an increase in income, with the exception of following:

- All adult household members with zero income or 100% fully excluded income (24 CFR 5.609) who subsequently obtain income may be required to report within 30 calendar days and re-certify.
- A participants' unemployment benefits end and the participant has started another job.
- The composition of the household changes in any way.
- A person with income joins the household.
- A participant on layoff, temporary disability, or summer vacation (i.e. school board employee) returns to work.
- The family is a FSS program participant.
- A new source of income is reported.
- A family requests an interim determination because of changes in family composition or income.

### Interim Reexamination Policy (HOTMA)

1. Residents are required to report all changes in family income, composition or status to the CMHA within 30 calendar days of the occurrence, via the electronic Portal or method specified by CMHA. Failure to report is a lease violation and may result in lease termination, even if reporting would not result in a change in rent. Further, failure to report within the 30 calendar days, in the manner required, may result in a retroactive rent increase, but not a retroactive credit or rent reduction. In order to qualify for rent reductions, residents must report income decreases promptly. Residents are also required to report interim increases in income if they have been granted interim rent reductions or have previously reported zero income.

Under the HOTMA regulation, CHMA is not required to perform interim rent adjustments if they believe that the difference in a family's annual income (either an increase or a decrease) will amount to a difference of less than 10 percent.

2. In addition, CMHA may decline to do interim adjustments in the last 3 months before a family's annual or biennial reexamination.
3. If failing to perform an interim adjustment will make it impossible for a family to pay rent, CMHA may conduct the interim adjustment in the last 3 months before the reexamination.

## Chapter 13 – Addition/Removal (Provide Clarity)

If CMHA makes a calculation error at admission to the program or at an annual reexamination, an interim reexamination will be conducted, if necessary, to correct the error, but the family will not be charged retroactively. Families will be given decreases, when applicable; retroactive to when the decrease for the change would have been effective if calculated correctly. Any credit due to the family will be paid to the property owner upon processing the revised certification.

### Decreases in Income

Participants may report a decrease in income, that will last a minimum of 30 days, and other changes which would reduce the amount of tenant rent, such as an increase in allowances or deductions. CMHA must calculate the change if a decrease in income is reported. CMHA will not process the rent adjustment unless CMHA confirms that the decrease in income will last 30 calendar days or more. This must be reported through CMHA's online portal.

### PHA Errors

The family is responsible for reviewing CMHA's determination of household income, assets and expenses used in the calculation of rent, and for bringing any errors or omissions to CMHA's attention in writing within thirty (30) calendar days of receipt of the Addendum. The family will be responsible for repayment of any overpayments made on their behalf by CMHA.

If the CMHA makes a calculation error at admission to the program or at an annual reexamination, an interim reexamination will be conducted, if necessary, to correct the error, but the family will not be charged retroactively. Families will be given decreases, when applicable; retroactive to when the decrease for the change would have been effective if calculated correctly.

## D. OTHER INTERIM REPORTING ISSUES

### Standard for Timely Reporting of Changes

CMHA requires that families report interim changes in writing, electronic Portal or method specified by the program, within 30 days of when the change occurs.

If the change is not reported in the manner required, within the 30-day time period, it will be considered untimely reporting and a program violation.

### Procedures when the change is Reported in a Timely and Untimely Manner

CMHA will notify the family and owner of any change in the Housing Assistance Payment to be effective according to the following guidelines:

#### Timely Reporting

Increases in the Tenant Rent are effective on the first of the month following thirty days' notice of the change by CMHA. If a tenant submits a Mutual Termination Notice and the effective date is less than 30 days from the transfer date, the 30-