



## Summary of Proposed Changes to the 2025-2026 CMHA Admissions and Continued Occupancy Policy

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

### **Section II – Eligibility for Admission and Processing of Applications**

CMHA will use an online module for applications. This change clarifies that changes/updates to the application must be made using the online application portal called Rent Café.

#### 3. Determining if the Waiting List may be Closed

At the time of initial intake, CMHA will advise families of their responsibility to ~~update their change of notify CMHA when their~~ income, mailing address, email address, phone numbers, or family composition changes, change in wait-list unit choices, and wait-list preferences by signing into their Rent Café portal account. within 10 business days of the change. The changes must be submitted in writing via ~~first class mail or via electronic transmission (ex. email or portal access)~~ the Rent Café portal.

**Section II – Eligibility for Admission and Processing of Applications**

Preferences are used to determine the order of an applicant’s selection from the waitlist. The preferences were revised to provide clearer definitions and to facilitate timely relocations of affected households.

**F. Local Preferences and Unit Selection**

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

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

3. **Definitions of Preferences:**

a. Definition of Victims of involuntary displacement by government agency or natural disaster:

(1) An individual or family that must vacate their residence as a result of involuntary displacement caused by government action (including public improvement, acquisition, or other governmental orders) or by a declared natural disaster (such as fire, flood, or other catastrophic event).

(2) This preference applies when the displacement is beyond the families' control and the unit has been rendered uninhabitable or the household has been ordered to vacate in accordance with federal, state, or local law.

(3) These individuals will supersede the point system and move to the top of the waiting list due to the exigent situation.

b. Definition of Referral from CMHA Owned or Managed Properties: A referral of household from any CMHA-owned or CMHA/Touchstone Managed Properties due to demolition, conversion, or other extenuating circumstances as defined by CMHA.

~~g.i.~~ Conversion of Property—~~Individuals:~~ Individuals who are/were living within a ~~Converted~~ Project regardless to program type (e.g. RAD, Section 18, PBV) at the time of the conversion and must now be temporarily relocated due to the rehabilitation/demolition or disposition of the property. ~~These individuals:~~ may voluntarily elect to apply for the public housing program and if qualified may remain in the current unit.

~~h.j.~~ **HCV Abatement-Affected Family Preference:** The PHA will provide a preference for an HCV family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher. [24 CFR 982.404(e)(2)]

## **Section III – Tenant Selection and Assignment Plan**

CMHA is moving from three housing offers to one in order to reduce wait times, ensure fairness, and quickly serve families in urgent need of housing. Multiple offers slow down the leasing process and can leave units vacant while other households continue to wait. A single-offer system allows CMHA to fill units faster, improve efficiency, and ensure more applicants receive housing sooner, while still allowing “good cause” exceptions when truly necessary.

### **Section III - Tenant Selection and Assignment Plan**

#### **A. Organization of the Waiting List**

1. ~~Community Based~~ Waiting List

Each applicant shall be assigned his/her appropriate place on the ~~site-based~~bedroom size waiting list(s) selected by the applicant in sequence based upon:

- a. type and size of unit needed and selected by the family (e.g. general occupancy building, accessible or non-accessible unit, number of bedrooms);
- b. applicant preference or priority, if any; and
- c. date and time the application is received.

2. CMHA will maintain its waiting list in the form that records the type and size of unit needed, each applicant's priority/preference status and the date and time of application. CMHA will maintain one waitlist on type and size of unit needed based on bedroom sizes. 0-6 bedrooms. The applicant can select “first available” unit offer. The applicant will be given ~~three~~one offers and if ~~all offers are~~ refused they will be withdrawn from the waitlist and would need to reapply for LIPH housing.

3. When units become available for applicants on the ~~site~~bedroom size-based wait list, a group of applicants will be “Selected” or “Pulled” from the wait list in the determined sequence (date and time) and subject to income targeting requirements. The selected applicants will be contacted to complete the Interview and Verification process to determine their eligibility for the program. The applicant will remain in the Selected Pull batch/grouping for purposes of qualification and unit offer(s).

4. In the event there are no eligible applicants on the ~~site~~bedroom size based waiting list with a vacancy, the site may offer the unit to the next eligible applicant. <sup>15</sup>

## **Section V – Transfer Policy**

The transfer section was updated to more clearly distinguish between:

- Emergency transfers (life/safety hazards, VAWA situations)
- Administrative transfers (reasonable accommodation, occupancy standards)
- Demolition/disposition/rehab-related moves or RAD moves

The revisions ensure residents understand the process, their rights, and the documentation required. The updates also emphasize fairness by standardizing one transfer offer unless good cause is verified.

## **Section V - Transfer Policy**

### **A. General Transfer Policy**

**A.**

1. The Public Housing Authority (PHA) recognizes that residents may require transfers to different dwelling units for reasons of safety, health, accessibility, occupancy, demolition, disposition or rehabilitation need. This policy establishes two categories of transfers and outlines the criteria, priority, and procedures governing such moves.

1.2. It is CMHA's policy that transfers will be made without regard to any protected category<sup>16</sup>. Residents can be transferred to accommodate a disability.

3.

2.4. 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 at CMHA's discretion 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 demolition, rehabilitation or 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, Rental Assistance Demonstration, Section 18, other instrumentalies due to demolition, rehabilitation or disposition of property. AD or Non-RAD, Section 18 units.

## F. Types of Transfers

### Category 1: Emergency and Safety Transfers

This category includes transfers required to protect the health, safety, or welfare of residents.

Transfers under this category include:

#### 1. Domestic Violence (VAWA) Transfers

- o Residents who are victims of domestic violence, dating violence, sexual assault, or stalking may request an emergency transfer if they reasonably believe that remaining in their current unit poses an imminent threat to their safety or the safety of a household member.
- o The PHA shall process such transfers in accordance with the Violence Against Women Act (VAWA) and HUD regulations at 24 C.F.R. § 5.2005(e).
- o Residents may provide documentation of the violence or threat, including police reports, court orders, or HUD certification forms (HUD-5382 or HUD-5383). The PHA will maintain strict confidentiality of all such information.

#### 2. Emergency Unit Condition Transfers

- o When a unit becomes uninhabitable or presents immediate health or safety hazards (e.g., fire, flood, structural failure), the PHA may transfer the resident to a comparable unit, temporarily or permanently. RAD, Demolition, Disposition or Rehabilitation projects within CMHA or
- o These transfers shall be treated with the same priority as VAWA emergency transfers.

#### 3. Demolition, Disposition, Rehabilitation

CMHA may transfer residents into units owned or managed by CMHA instrumentalities, affiliates, or partner entities, provided:

The receiving entity operates housing that complies with applicable federal, state, or local housing program requirements;

CMHA maintains documentation verifying continued eligibility; and

The transfer is consistent with fair housing, equal opportunity, and relocation regulations.

## Category 2: Administrative and Occupancy Transfers

This category includes transfers made to address household composition or disability-related needs.

### 1. Reasonable Accommodation Transfers

- o A resident or household member with a disability may request a transfer when the current unit does not meet the disability-related needs of the household.
- o Requests shall be processed as a reasonable accommodation under the Fair Housing Act and Section 504 of the Rehabilitation Act.
- o Examples include relocation to a wheelchair-accessible unit, a ground-floor unit, or a unit closer to medical facilities.
- o Verification of disability-related need may be required, but medical details shall not be requested.

### 2. Occupancy Standard Transfers

- o Transfers may be required or approved when a family becomes over-housed (too many bedrooms) or under-housed (too few bedrooms) in accordance with the PHA's occupancy standards.
- o The PHA may initiate or approve such transfers to make efficient use of available housing resources.

F.

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.

## Priority of Transfers

Transfers will be processed in order of priority as follows

### 1. Emergency Transfers

including safety/health threats (maintenance hazards) and VAWA emergency transfers. Shall take priority over new admissions. 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.

Demolition, Disposition, Rehabilitation

CMHA may transfer residents into units owned or managed by CMHA instrumentalities, affiliates, or partner entities, provided:

The receiving entity operates housing that complies with applicable federal, state, or local housing program requirements;

CMHA maintains documentation verifying continued eligibility; and

The transfer is consistent with fair housing, equal opportunity, and relocation regulations.

## **2. Administrative Transfer**

Reasonable Accommodation Transfers – when a household member’s disability necessitates a move. Reasonable Accommodations are voluntary and shall take priority over new admissions.

Requests for these transfers will be sent to the location designated by CMHA for review and determination. 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).

Occupancy Standards Transfers – a) required by PHA (over- or under-housed) are mandatory transfers within or between sites to correct serious occupancy standard problems (over or under CMHA’s standards) as described below.

Refusal of the transfer offer, without good cause, will result in lease termination and referred to the property manager.

## **General Conditions**

1. All transfer requests must be submitted in writing to the PHA.
2. The PHA will verify eligibility, determine priority, and approve or deny transfer requests based on policy criteria and available units.
3. The PHA will maintain documentation of all transfer requests and decisions.
4. Confidentiality shall be maintained for all domestic violence and disability-related transfers.
5. Residents will not lose housing assistance or face adverse action for requesting a transfer under VAWA or as a reasonable accommodation.

6. The PHA will notify residents in writing of approval or denial, and include appeal rights, if applicable.

~~1. Emergency Transfer (1) are mandatory. 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. ~~For all approved transfers, r~~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. If a unit is not available, the relocation department will utilize the Housing Choice Voucher referral process as an alternative option.
- 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 crimes<sup>47</sup> or extreme harassment; *or to witnesses of crimes,<sup>48</sup> or to victims of domestic violence, dating violence, stalking, or sexual assault<sup>49</sup>*, 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.~~

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<sup>47</sup> Following consultation with Housing Opportunity Made Equal that such a transfer is appropriate.

<sup>48</sup> Following consultation with and upon recommendation of the local prosecutor that such a transfer is appropriate and recommended.

<sup>49</sup> The individual seeking the transfer may provide supportive referrals from a third party social service agency, the local prosecutor or law enforcement. The procedure for a VAWA emergency transfer is outlined in the Emergency Transfer VAWA Plan, which is an addendum to this ACOP.

- ~~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.~~
- ~~c. 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.~~

H.

a.

- ~~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.~~Category 3 Administration transfers will not take priority over new admissions. They will be processed at the rate of one transfer to four admissions.  
Whenever possible, Resident transfers will be made within the site of their current occupancy.~~

## B. Processing Transfers

1. A centralized transfer waiting list will be administered by CMHA's Relocation Department. The administration of the centralized transfer list will be managed and processed by date and time of submission. Emergency transfers, as defined by this Section, will be given priority over other date and time transfers. Residents are responsible for submitting requests for transfer, including necessary documentation to the location designated by CMHA.
2. After signing a lease, tenants will have 35 days total, to complete a move
3. Relocation Department will receive approved transfers via email from Asset Management, ~~and/or~~ the CMHA's 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
  - e.

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.

4. Administrative Transfers include the following: Transfers to correct occupancy standards may be recommended at time of recertification or interim re-determination. This is the only method used to determine over/under housed status.
5. Residents in a ~~Category 2~~Administrative Transfer Category for over/under housed status will be advised in their 30-day *Notice of Result of Recertification* that a transfer is recommended and that the family has been placed on the transfer list.
6. Split-family transfer requests will be processed in accordance with the regular admissions process. Families that wish to split into two separate households will be treated as a new admission for purposes of their placement on the Waiting List.
- ~~7. Category 3 Administrative transfers will be processed with new admissions using a ratio of one transfer for every four new admissions. This ratio is discretionary and will be reviewed at least annually to determine its effects on vacancy.~~

- ~~a. are in compliance with the requirement to recertify for continued occupancy~~
- ~~b. do not currently owe back rent or other charges~~
- ~~have r have no housekeeping lease violations for the past 12 months~~

Exceptions to the Tenant Qualifications requirements may be made for emergency transfers, mandatory transfers or when it is necessary for CMHA (occupancy violations) to move forward with the transfer.

~~E.~~

The Cincinnati Metropolitan Housing Authority (CMHA) released a proposed Significant Amendment to its current FY2025-2026 the Asset Management Admissions and Continued Occupancy Policy (ACOP) on December 11, 2025 and has commenced a forty-five day comment period. Pursuant to Section 511 of the Qualified Housing and Work Responsibility Act of 1998, and 24 CFR 903, a copy of the proposed changes to the ACOP can be found at 1627 Western Ave, or on-line at [www.cintimha.com](http://www.cintimha.com). These are available for public inspection during normal business hours (Monday- Friday 8:00 AM – 4:40 PM). During the 45-day public comment period you may submit written comments to the address above or by email to [Geri.Hernandez@cintimha.com](mailto:Geri.Hernandez@cintimha.com) no later than January 25, 2026.