



Summary of Proposed Changes to the 2026-2027 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.

C Waiting List Management

3. Determining the Waiting List may be closed

At the time of initial intake, CMHA will advise families of their responsibility to update their change of 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 the Rent Café portal.-

D. Processing Application for Admission

5. Interviews and Verification Process:

As applicants approach the top of the waiting list, they will be contacted for an interview to complete their applicant file. Applicants who fail to complete the interview process or who cannot be contacted to schedule an interview will have their applications withdrawn, subject to reasonable accommodations for people with disabilities.

CMHA may conduct the interview and verification process remotely via a video conferencing platform, when available, in person or other suitable alternative. If an applicant does not have the necessary technology to fully participate, CMHA may provide the applicant access to the technology at CMHA's main campus.

Section II – Eligibility for Admission and Processing of Applications

references 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 –	42 Points
Conversion of Property	
Conversion of Properties	42 Points
HCV Abatement-Affected Family Preference	42 Points
Referral from CMHA Owned or Managed Properties	42 Points
Victims of domestic violence - referral from YWCA, Women Helping Women, or Third-Party Social Service Agency	9 Points
Victims of domestic violence – Self certification only	4 Points
Referral from Local Homeless Partners or Third-Party Certification	4 Points
Veteran preference	9 Points
Full-time students (Head/Co-Head of Household with 3rd party verification from the school)	3 Points
Disabled Families or Elderly	3 Points
Family Unification (see below/to be defined)	2 Points
Good Neighbor Program Completion	2 Points
Youths aging out of foster care who are between the ages of 18 to 24.	2 Points
Working Families (head, spouse, or sole member is employed)¹	3 Points

3. **Definitions of Preferences:**

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

¹ Applicant must be given the benefit of the working family preference if the head and spouse, or sole member is age 62 or older, or is a person with disabilities.

- (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.

c. Conversion of Property: Individuals who are/were living within a Converted Project regardless to program type (e.g. RAD, Section 18, PBV) 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.

6. The unit size standards shall be discussed with each applicant family that qualifies for more than one-unit size. Families will also be informed about their status and movement on the various waiting lists maintained by CMHA. Families shall be asked to declare, in writing, the waiting list(s) on which they wish to be placed. If a family requests a smaller unit size than would normally be assigned under the largest unit size standard, the family will be required to sign a statement agreeing to the unit assignment until their family size or circumstances change. At the family's request, CMHA shall change the family's ~~site preference~~ bedroom size any time while the family is on the waiting list.

Section IV - Leasing Policies and Occupancy of Dwelling Units

CMHA clarifies how children are counted as household members when joint custody arrangements or foster care placements exist. Children subject to joint custody will be considered household members if they reside with the family at least 50 percent of the time. When more than one household claims the same child, CMHA will determine household membership based on available documentation, such as custody orders, tax records, or school records.

Additionally, children who are temporarily absent due to placement in foster care will continue to be counted as household members unless the appropriate agency confirms that the child has been permanently removed from the home. These clarifications ensure consistent household composition determinations and compliance with HUD regulations.

A. Leasing and Occupancy of Dwelling Units

Applications for admission will be processed centrally. Initial intake, waiting list management and screening will also be handled by the Eligibility Department. All other transfer offers will be coordinated by Eligibility/Relocation Staff.

11. Joint Custody of Children - Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 50 percent or more of the time.

When more than one applicant or assisted family (regardless of program) are claiming the same dependents as family members, the family with primary custody at the time of the application or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, an IRS income tax return showing which family has claimed the child for income tax purposes, school records, or other credible documentation.

12. Absence Due to Placement in Foster Care - If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to return home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member. [24 CFR 5.403].

E. Absences from the Unit

1. If the family includes children that are temporarily absent due to placement in foster care, CMHA verify with the appropriate agency whether and when the child is expected to return home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member. [24 CFR 5.403].

Section II – Eligibility for Admission and Processing of Applications –

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

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.
2. It is CMHA's policy that transfers will be made without regard to any protected category². Residents can be transferred to accommodate a disability.
- 3.
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 circumstancesTemporary and/or Permanent Relocation assistance from Asset Management Services, Rental Assistance Demonstration, Section 18, other instrumentalies due to demolition, rehabilitation or disposition of property.

Types of Transfers

Types of Transfers

Emergency and Safety Transfers

This category includes transfers required to protect the health, safety, or welfare of residents and will take priority over new admissions.

Transfers under this category include:

1. Domestic Violence (VAWA) Transfers

Pursuant to 24 CFR § 5.2005(e), the PHA has adopted an Emergency Transfer Plan for VAWA-protected tenants. The Plan is incorporated into this ACOP and governs all transfers requested under VAWA protections.

Please reference to **Section XVII**

2. Emergency Unit Condition Transfers

- 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). Including Rental Assistance Demonstration (RAD) , Demolition, Disposition or Rehabilitation projects within CMHA.
- These transfers may 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

- 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.
- Requests may be processed as a **reasonable accommodation** under the **Fair Housing Act** and **Section 504 of the Rehabilitation Act**.
- Examples include relocation to a wheelchair-accessible unit, a ground-floor unit, or a unit closer to medical facilities.
- Verification of disability-related need may be required, but medical details shall not be requested.

2. Occupancy Standard Transfers

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.

The PHA may initiate or approve such transfers to make efficient use of available housing resources.

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

Priority of Transfers

Transfers may 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 may 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, may result in lease termination and referred to the property manager.

General Conditions

1. Resident’s may submit transfer requests in writing to the PHA.
2. The PHA may verify eligibility, determine priority, and approve or deny transfer requests based on policy criteria and available units.
3. The PHA may maintain documentation of all transfer requests and decisions.
4. Confidentiality shall be maintained for all domestic violence and disability-related transfers.
5. Residents may not lose housing assistance or face adverse action for requesting a transfer under VAWA or as a reasonable accommodation.
6. The PHA may notify residents in writing of approval or denial, and include appeal rights, if applicable.

- a. For all approved transfers, resident may receive one transfer offer, at which time the household composition and unit size may be reviewed and corrected upon providing the transfer unit offer. The transfer offer may 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 may 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 may utilize the Housing Choice Voucher referral process as an alternative option.

- b. Refusal of the transfer offer, without good cause, may 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 may remain active on the waitlist.

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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, may 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 3 days total, to complete a move
3. Relocation Department will receive approved transfers via email from Asset Management, 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.)transfers (caused by conditions that make the unit uninhabitable);
 - b. deemed an emergency due to the resident's need for housing options as defined in this section- VAWA.)
 - c. Reasonable Accommodation
 - d. 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 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.

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.

Section VII - Interim Rent Adjustments: Income-Based Rent

CMHA clarifies policies related to interim rent adjustments, including the treatment of Social Security Administration overpayment withholdings. The policy reinforces resident responsibilities for timely and accurate reporting of household income and composition changes and distinguishes between family-caused and staff-caused errors for purposes of retroactive rent adjustments or credits.

CMHA will process interim changes in rent in accordance with the chart below:

TYPE of INCOME CHANGE	<u>CMHA ACTION</u>
(g) Social Security Administration OverPays resulting in a withholding or deduction from benefits	<ul style="list-style-type: none">CMHA will decrease decrease rent after deducting only the amount of the <u>overpayment</u> withholdings from the gross benefit amount based on the effective date of the notice

A. Failure to Report Accurate Information

The resident is responsible for reporting all household income/composition changes and reviewing CMHA's rent determination letter outlining the 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.

If a resident misrepresents the facts upon which his/her rent is based, or fails to timely report changes to CMHA, including errors or omissions by CMHA, so that the rent charged is less than what should have been charged, then the increase in rent will be made retroactive. Failure to report accurate information may result in termination of the lease.

1. 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 resident will not be charged retroactively. Residents will be given decreases, when applicable; retroactive to when the decrease for the change would have been effective if calculated correctly. CMHA will credit the resident for any overpayment of rent resulting from staff-caused errors or a de minimis error
2. In the case of family-caused errors or program abuse, the family will be required to repay any amounts of rent underpaid. The CMHA may, but is not required to, offer the family a repayment agreement policy. If the family fails to repay the amount owed, the PHA will terminate the family's lease in accordance with the CMHA's policies.
3. The PHA will not reimburse the family for any overpayment of rent when the overpayment clearly is caused by the family.

Section XVII - Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

CMHA updates its Emergency Transfer Plan to fully comply with the Violence Against Women Act (VAWA) and HUD regulations at 24 CFR Part 5, Subpart L. The plan has been incorporated into the ACOP and this section created which clarifies eligibility criteria, documentation standards, confidentiality protections, and internal versus external emergency transfer processes to ensure resident safety and regulatory compliance.

Section XVII

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

Cincinnati Metropolitan Housing Authority (CMHA) is concerned about the safety of its residents, and such concern extends to residents who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the *Violence Against Women Act* (VAWA), CMHA allows residents who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the resident's current unit to another unit. Such transfer will be prioritized and processed as an Emergency Transfer in accordance with CMHA's Admissions and Occupancy Plan ("ACOP").

The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation or any protected characteristic, including race, color, national origin, religion, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status. The ability of CMHA to honor such requests for residents currently receiving assistance, however, may depend upon a preliminary determination that the resident is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether CMHA has another dwelling unit that is available and is safe to offer the resident for temporary or more permanent occupancy.

This plan identifies residents who are:

1. eligible for an emergency transfer,
2. the documentation needed to request an emergency transfer,
3. confidentiality protections,
4. how an emergency transfer may occur, and
5. guidance to residents on safety and security.

CMHA's plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees

that CMHA, and is in compliance with VAWA, 24 CFR part 5, subpart L, related program regulations, and the model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD).

Definitions

- External emergency transfer refers to an emergency relocation of a resident to another unit where the resident would be categorized as a new applicant; that is, the resident must undergo an application process in order to reside in the new unit.
- Internal emergency transfer refers to an emergency relocation of a resident to another unit where the resident would not be categorized as a new applicant; that is, the resident may reside in the new unit without having to undergo an application process.
- Safe unit refers to a unit that the victim of VAWA violence/abuse believes is safe.
- VAWA violence/abuse means an incident or incidents of domestic violence, dating violence, sexual assault, or stalking, as those terms are defined in 24 CFR 5.2003 and “Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking” (Form HUD-5382).

Eligibility for Emergency Transfers

A resident who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD’s regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer if the resident reasonably believes that there is a threat of imminent harm from further violence, including trauma, if the resident remains within the same unit. If the resident is a victim of sexual assault, the resident may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A resident requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

CMHA does not evaluate whether the resident is in good standing as part of the assessment or provision of an emergency transfer. Whether or not a resident is in good standing does not impact their ability to request an emergency transfer under VAWA.

Transfer Request Documentation

To request an emergency transfer, the resident shall complete a VAWA Certification form by going to CMHA’s Asset Management Department at 1088 W. Liberty Cincinnati, OH 45214 and requesting a VAWA Notice and VAWA Request form. The completed form will be received by the Asset Management Department. The 504 Coordinator will provide a written response to the resident after receipt of all necessary information. CMHA will provide reasonable accommodations to this policy for individuals with disabilities.

CMHA also provides a copy of the Notice of Occupancy Rights Under the Violence Against Women Act (Form HUD-5380) and the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD-5382) (collectively, “VAWA Notice and Certification forms”) at program admission, when serving eviction or termination notices and prior to

termination of tenancy, or when admission is denied. Current VAWA Notice and Certification forms are included at the end of this Plan and are incorporated herein.
A resident is eligible for an emergency transfer if:

1. The resident (or their household member) is a victim of VAWA violence/abuse;

2. The resident expressly requests the emergency transfer; AND

3. EITHER

a. The resident reasonably believes that there is a threat of imminent harm from further violence, including trauma, if they (or their household member) stays in the same dwelling unit; OR

b. If the resident (or their household member) is a victim of sexual assault, either the resident reasonably believes that there is a threat of imminent harm from further violence, including trauma, if the resident (or their household member) were to stay in the unit, or the sexual assault occurred on the premises and the resident requested an emergency transfer within 90 days (including holidays and weekend days) of when that assault occurred.

If CMHA does not already have documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking, the resident may be asked for this documentation in accordance with 24 CFR 5.2007. Unless CMHA receives documentation that contains conflicting information, as described in 24 CFR 5.2007(b)(2), third-party documentation to determine status as a VAWA victim for emergency transfer eligibility will not be requested.

To request an emergency transfer or to read CMHA's VAWA Emergency Transfer Plan, go to CMHA's Asset Management Department at 1088 W. Liberty Cincinnati, OH 45214 and request a VAWA Notice and VAWA Certification form and/or request to read the ACOP, which contains CMHA's VAWA Emergency Transfer Plan.

To read this information in other languages, please contact CMHA's 504 Coordinator, Lynn Stephens, at SpecialRequests@cintimha.com. Translated VAWA forms may also be found at: https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a#4. Language assistance regarding your VAWA protections (for example, oral interpretation and/or written translation) will be provided.

Emergency Transfer Timing and Availability

CMHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. CMHA will, however, act as quickly as possible to move a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a resident reasonably believes a proposed transfer would not be safe, the resident may request a transfer to a different unit. If a unit is available, the transferred resident must agree to abide by the terms and conditions that govern occupancy in the unit to which the resident has been transferred. VAWA provisions do not supersede eligibility or other occupancy requirements that may apply under

a covered housing program. Accordingly, CMHA cannot transfer a resident to a particular unit or program unless the resident establishes eligibility for that unit or program.

If CMHA has no safe and available units for which a resident who needs an emergency transfer is eligible, CMHA may offer a referral to the Housing Choice Voucher program to the resident. CMHA will assist in identifying other housing providers who may have safe and available units to which the resident could move. At the resident's request, CMHA will also assist in contacting local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Confidentiality

If a resident inquires about or requests any VAWA protections or represents that they or a household member are a victim of VAWA violence/abuse entitled to VAWA protections, CMHA will keep any information they provide concerning the VAWA violence/abuse, their request for an emergency transfer, and their or a household member's status as a victim strictly confidential. This information is kept securely and separately from tenant files. All the information provided by or on behalf of the resident to support an emergency transfer request, including information on the Certification Form (HUD-5382) and the VAWA Lease Addendum (HUD-5383) (collectively referred to as "Confidential Information") may only be accessed by CMHA employees or contractors if explicitly authorized by CMHA for reasons that specifically call for those individuals to have access to that information under applicable Federal, State, or local law.

Confidential information will not be entered into any shared database or disclosed to any other entity or individual, except if written permission by the victim in a time-limited release; required for use in an eviction proceeding or hearing regarding termination of assistance; or otherwise required by applicable law. In addition, CMHA maintains strict confidentiality measures to ensure that the location of the victim's dwelling unit is never disclosed to a person who committed or threatened to commit the VAWA violence/abuse.

Safety & Security of Residents

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the resident is urged to take all reasonable precautions to be safe. When any inquiry or request regarding an emergency transfer is received, CMHA encourages the resident to take all reasonable precautions to be safe, including seeking guidance and assistance from a victim service provider. However, residents are not required to receive guidance or assistance from a victim service provider. For additional information on VAWA and to find help in your area, visit <https://www.hud.gov/vawa>.

National Resources: Residents who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Residents who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://www.rainn.org/>

Residents who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>

Local Resources: Residents who are or have been victims of domestic violence may contact the local shelter YWCA at 513-872-9259 or **Toll-Free: 888-872-9259 (TTY accessible)**, or Women Helping Women at 513-381-5610. Persons with hearing impairment can be accessed by calling 513-977-5545 (TTY).

Residents who are or have been victims of domestic violence, dating violence, sexual assault, or stalking may contact the Cincinnati Police Department (CPD) — Victims Outreach Office at 513-352-3542, or visit online at <https://cincinnati-oh.gov/police>.

Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking

When should I receive this form? A covered housing provider must provide a copy of the Notice of Occupancy Rights Under The Violence Against Women Act (Form HUD-5380) and the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD-5382) when you are admitted as a tenant, when you receive an eviction or termination notice and prior to termination of tenancy, or when you are denied as an applicant. A covered housing provider may provide these forms at additional times.

What is the Violence Against Women Act (“VAWA”)? This notice describes protections that may apply to you as an applicant or a tenant under a housing program covered by a federal law called the Violence Against Women Act (“VAWA”). VAWA provides housing protections for victims of domestic violence, dating violence, sexual assault or stalking. VAWA protections must be in leases and other program documents, as applicable. VAWA protections may be raised at any time. You do not need to know the type or name of the program you are participating in or applying to in order to seek VAWA protections.

What if I require this information in a language other than English? To read this information in Spanish or another language, please contact CMHA’s 504 Coordinator, Lynn Stephens, at SpecialRequests@cintimha.com. You can read translated VAWA forms at https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a#4. If you speak or read in a language other than English, your covered housing provider must give you language assistance regarding your VAWA protections (for example, oral interpretation and/or written translation).

What do the words in this notice mean?

- *VAWA violence/abuse* means one or more incidents of domestic violence, dating violence, sexual assault, or stalking.
- *Victim* means any victim of *VAWA violence/abuse*, regardless of actual or perceived sexual orientation, gender identity, sex, or marital status.
- *Affiliated person* means the tenant’s spouse, parent, sibling, or child; or any individual, tenant, or lawful occupant living in the tenant’s household; or anyone for whom the tenant acts as parent/guardian.
- *Covered housing program*¹ includes the following HUD programs:
 - Public Housing
 - Tenant-based vouchers (TBV, also known as Housing Choice Vouchers or HCV) and Project-based Vouchers (PBV) Section 8 programs
 - Section 8 Project-Based Rental Assistance (PBRA)
 - Section 8 Moderate Rehabilitation Single Room Occupancy
 - Section 202 Supportive Housing for the Elderly
 - Section 811 Supportive Housing for Persons with Disabilities
 - Section 221(d)(3)/(d)(5) Multifamily Rental Housing
 - Section 236 Multifamily Rental Housing
 - Housing Opportunities for Persons With AIDS (HOPWA) program
 - HOME Investment Partnerships (HOME) program
 - The Housing Trust Fund
 - Emergency Solutions Grants (ESG) program
 - Continuum of Care program
 - Rural Housing Stability Assistance program
- *Covered housing provider* means the individual or entity under a covered housing program that is responsible for providing or overseeing the VAWA protection in a specific situation. The covered housing provider may be a public housing agency, project sponsor, housing owner, mortgagor, housing manager, State or local government, public agency, or a nonprofit or for-profit organization as the lessor.

¹ For information about non-HUD covered housing programs under VAWA, see Interagency Statement on the Violence Against Women Act’s Housing Provisions at <https://www.hud.gov/sites/dfiles/PA/documents/InteragencyVAWAHousingStmnt092024.pdf>.

What if I am an applicant under a program covered by VAWA? You can't be denied housing, housing assistance, or homeless assistance covered by VAWA just because you (or a household member) are or were a victim or just because of problems you (or a household member) had as a direct result of being or having been a victim. For example, if you have a poor rental or credit history or a criminal record, and that history or record is the direct result of you being a victim of VAWA abuse/violence, that history or record cannot be used as a reason to deny you housing or homeless assistance covered by VAWA.

What if I am a tenant under a program covered by VAWA? You cannot lose housing, housing assistance, or homeless assistance covered by VAWA or be evicted just because you (or a household member) are or were a victim of VAWA violence/abuse. You also cannot lose housing, housing assistance, or homeless assistance covered by VAWA or be evicted just because of problems that you (or a household member) have as a direct result of being or having been a victim. For example, if you are a victim of VAWA abuse/violence that directly results in repeated noise complaints and damage to the property, neither the noise complaints nor property damage can be used as a reason for evicting you from housing covered by VAWA. You also cannot be evicted or removed from housing, housing assistance, or homeless assistance covered by VAWA because of someone else's criminal actions that are directly related to VAWA abuse/violence against you, a household member, or another affiliated person.

How can tenants request an emergency transfer? Victims of VAWA violence/abuse have the right to request an emergency transfer from their current unit to another unit for safety reasons related to the VAWA violence/abuse. An emergency transfer cannot be guaranteed, but you can request an emergency transfer when:

1. You (or a household member) are a victim of VAWA violence/abuse;
2. You expressly request the emergency transfer; AND
3. EITHER
 - a. you reasonably believe that there is a threat of imminent harm from further violence, including trauma, if you (or a household member) stay in the same dwelling unit; OR
 - b. if you (or a household member) are a victim of sexual assault, either you reasonably believe that there is a threat of imminent harm from further violence, including trauma, if you (or a household member) were to stay in the unit, or the sexual assault occurred on the premises and you request an emergency transfer within 90 days (including holidays and weekend days) of when that assault occurred.

You can request an emergency transfer even if you are not lease compliant, for example if you owe rent. If you request an emergency transfer, your request, the information you provided to make the request, and your new unit's location must be kept strictly confidential by the covered housing provider. The covered housing provider is required to maintain a VAWA emergency transfer plan and make it available to you upon request.

To request an emergency transfer or to read the covered housing provider's VAWA emergency transfer plan, go to CMHA's Asset Management Department at 1088 W. Liberty Cincinnati, OH 45214 and request a VAWA Notice and VAWA Request form and request to read the ACOP, which contains CMHA's VAWA Emergency Transfer Plan. The VAWA emergency transfer plan includes information about what the covered housing provider does to make sure your address and other relevant information are not disclosed to your perpetrator.

Can the perpetrator be evicted or removed from my lease? Depending on your specific situation, your covered housing provider may be able to divide the lease to evict just the perpetrator. This is called "lease bifurcation."

What happens if the lease bifurcation ends up removing the perpetrator who was the only tenant who qualified for the housing or assistance? In this situation, the covered housing provider must provide you and other remaining household members an opportunity to establish eligibility or to find other housing. If you cannot or don't want to establish eligibility, then the covered housing provider must give you a reasonable time to move or establish eligibility for another covered housing program. This amount of time varies, depending on the covered housing program involved. The table below shows the reasonable time provided under each covered housing programs with HUD. Timeframes for covered housing programs operated by other agencies are determined by those agencies.

<u>Covered Housing Program(s)</u>	<u>Reasonable Time for Remaining Household Members to Continue to Receive Assistance, Establish Eligibility, or Move.</u>
<u>HOME and Housing Trust Fund, Continuum of Care Program (except for permanent supportive housing), ESG program, Section 221(d)(3) Program, Section 221(d)(5) Program, Rural Housing Stability Assistance Program</u>	<u>Because these programs do not provide housing or assistance based on just one person's status or characteristics, the remaining tenant(s), or family member(s) in the CoC program, can keep receiving assistance or living in the assisted housing as applicable.</u>
<u>Permanent supportive housing funded by the Continuum of Care Program</u>	<u>The remaining household member(s) can receive rental assistance until expiration of the lease that is in effect when the qualifying member is evicted.</u>
<u>Housing Choice Voucher, Project-based Voucher, and Public Housing programs (for Special Purpose Vouchers (e.g., HUD-VASH, FUP, FYI, etc.), see also program specific guidance)</u>	<u>If the person removed was the only tenant who established eligible citizenship/immigration status, the remaining household member(s) must be given 30 calendar days from the date of the lease bifurcation to establish program eligibility or find alternative housing.</u> <u>For HUD-VASH, if the veteran is removed, the remaining family member(s) can keep receiving assistance or living in the assisted housing as applicable. If the veteran was the only tenant who established eligible citizenship/immigration status, the remaining household member(s) must be given 30 calendar days to establish program eligibility or find alternative housing.</u>
<u>Section 202/811 PRAC and SPRAC</u>	<u>The remaining household member(s) must be given 90 calendar days from the date of the lease bifurcation or until the lease expires, whichever is first, to establish program eligibility or find alternative housing.</u>
<u>Section 202/8</u>	<u>The remaining household member(s) must be given 90 calendar days from the date of the lease bifurcation or when the lease expires, whichever is first, to establish program eligibility or find alternative housing.</u> <u>If the person removed was the only tenant who established eligible citizenship/immigration status, the remaining household member(s) must be given 30 calendar days from the date of the lease bifurcation to establish program eligibility or find alternative housing.</u>
<u>Section 236 (including RAP); Project-based Section 8 and Mod Rehab/SRO</u>	<u>The remaining household member(s) must be given 30 calendar days from the date of the lease bifurcation to establish program eligibility or find alternative housing.</u>
<u>HOPWA</u>	<u>The remaining household member(s) must be given no less than 90 calendar days, and not more than one year, from the date of the lease bifurcation to establish program eligibility or find alternative housing. The date is set by the HOPWA Grantee or Project Sponsor.</u>

Are there any reasons that I can be evicted or lose assistance? VAWA does not prevent you from being evicted or losing assistance for a lease violation, program violation, or violation of other requirements that are not due to the VAWA violence/abuse committed against you or an affiliated person. However, a covered housing provider cannot be stricter with you than with other tenants, just because you or an affiliated person experienced VAWA abuse/violence. VAWA also will not prevent eviction, termination, or removal if other tenants or housing staff are shown to be in immediate, physical danger that could lead to serious bodily harm or death if you are not evicted or removed from assistance. **But only if no other action can be taken to reduce or eliminate the threat** should a covered housing provider evict you or end your assistance, if the VAWA abuse/violence happens to you or an affiliated person. A covered housing provider must provide a copy of the Notice of Occupancy Rights Under The Violence Against Women Act (Form HUD-5380) and the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD-5382) when you receive an eviction or termination notice and prior to termination of tenancy.

What do I need to document that I am a victim of VAWA abuse/violence? If you ask for VAWA protection, the covered housing provider may request documentation showing that you (or a household member) are a victim. **BUT** the covered housing provider must make this request in writing and must give you at least 14 business days (weekends and holidays do not count) to respond, and you are free to choose any one of the following:

1. A self-certification form (for example, Form HUD 5382), which the covered housing provider must give you along with this notice. Either you can fill out the form or someone else can complete it for you;
2. A statement from a victim/survivor service provider, attorney, mental health professional or medical professional who has helped you address incidents of VAWA violence/abuse. The professional must state “under penalty of perjury” that he/she/they believes that the incidents of VAWA violence/abuse are real and covered by VAWA. Both you and the professional must sign the statement;
3. A police, administrative, or court record (such as a protective order) that shows you (or a household member) were a victim of VAWA violence/abuse; **OR**
4. If allowed by your covered housing provider, any other statement or evidence provided by you.

It is your choice which documentation to provide and the covered housing provider must accept any one of the above as documentation. The covered housing provider is prohibited from seeking additional documentation of victim status or requiring more than one of these types of documentation, unless the covered housing provider receives conflicting information about the VAWA violence/abuse.

If you do not provide one of these types of documentation by the deadline, the covered housing provider does not have to provide the VAWA protections you requested. If the documentation received by the covered housing provider contains conflicting information about the VAWA violence/abuse, the covered housing provider may require you to provide additional documentation from the list above, but the covered housing provider must give you another 30 calendar days to do so.

Will my information be kept confidential? If you share information with a covered housing provider about why you need VAWA protections, the covered housing provider must keep the information you share strictly confidential. This information should be securely and separately kept from your other tenant files. No one who works for your covered housing provider will have access to this information, unless there is a reason that specifically calls for them to access this information, your covered housing provider explicitly authorizes their access for that reason, and that authorization is consistent with applicable law.

Your information **will not be disclosed** to anyone else or put in a database shared with anyone else, except in the following situations:

1. If you give the covered housing provider written permission to share the information for a limited time;
2. If the covered housing provider needs to use that information in an eviction proceeding or hearing; or
3. If other applicable law requires the covered housing provider to share the information.

How do other laws apply? VAWA does not limit the covered housing provider’s duty to honor court orders about access to or control of the property, or civil protection orders issued to protect a victim of VAWA abuse/violence.

Additionally, VAWA does not limit the covered housing provider's duty to comply with a court order with respect to the distribution or possession of property among household members during a family break up. The covered housing provider must follow all applicable fair housing and civil rights requirements.

Can I request a reasonable accommodation? If you have a disability, your covered housing provider must provide reasonable accommodations to rules, policies, practices, or services that may be necessary to allow you to equally benefit from VAWA protections (for example, giving you more time to submit documents or assistance with filling out forms). You may request a reasonable accommodation at any time, even for the first time during an eviction. If a provider is denying a specific reasonable accommodation because it is not reasonable, your covered housing provider must first engage in the interactive process with you to identify possible alternative accommodations. To request a reasonable accommodation, please contact CMHA's 504 Coordinator Lynn Stephens at 513-977-6853 and state that you need a Reasonable Accommodation Request Form (or other assistance with reasonable accommodation). Your covered housing provider must also ensure effective communication with individuals with disabilities.

Have your protections under VAWA been denied? If you believe that the covered housing provider has violated these rights, you may seek help by contacting the HUD FHEO Field Office at Ph. (800)347-3739 and Kevin Laviano, Field Office Director, North Point Tower 1001 Lakeside Avenue, Suite #350 Cleveland, OH 44114. You can also find additional information on filing VAWA complaints at <https://www.hud.gov/VAWA> and https://www.hud.gov/program_offices/fair_housing_equal_opp/VAWA. To file a VAWA complaint, visit <https://www.hud.gov/fairhousing/fileacomplaint>.

Need further help?

- For additional information on VAWA and to find help in your area, visit <https://www.hud.gov/vawa>.
- To talk with a housing advocate, contact YWCA Crisis Intervention at Ph. (513)872-9259; Text (513)436-3606; CHAT: [rc.chat/ywca](https://www.hud.gov/vawa) or Legal Aid Society of Greater Cincinnati at Ph. (513)241.9400 or toll free Ph. 800.582.2682

Public reporting burden for this collection of information is estimated to range from 45 to 90 minutes per each covered housing provider's response, depending on the program. This includes time to print and distribute the form. Comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, QDAM, Department of Housing and Urban Development, 451 7th Street, SW, Washington, D.C. 20410. This notice is required for covered housing programs under section 41411 of VAWA and 24 CFR 5.2003. Covered housing providers must give this notice to applicants and tenants to inform them of the VAWA protections as specified in section 41411(d)(2). This is a model notice, and no information is being collected. A Federal agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

**CERTIFICATION OF DOMESTIC VIOLENCE, DATING
VIOLENCE, SEXUAL ASSAULT, OR
STALKING**

Confidentiality Note: Any personal information you share in this form will be maintained by your covered housing provider according to the confidentiality provisions below.

Purpose of Form: If you are a tenant of or applicant for housing assisted under a covered housing program, or if you are applying for or receiving transitional housing or rental assistance under a covered housing program, and ask for protection under the Violence Against Women Act ("VAWA"), you may use this form to comply with a covered housing provider's request for written documentation of your status as a "victim". This form is accompanied by a "Notice of Occupancy Rights Under the Violence Against Women Act," Form HUD-5380.

VAWA protects individuals and families regardless of a victim's age or actual or perceived sexual orientation, gender identity, sex, or marital status.

You are not expected and cannot be asked or required to claim, document, or prove victim status or VAWA violence/abuse other than as stated in "Notice of Occupancy Rights Under the Violence Against Women Act," Form HUD-5380.

This form is one of your available options for responding to a covered housing provider's written request for documentation of victim status or the incident(s) of VAWA violence/abuse. If you choose, you may submit one of the types of third-party documentation described in Form HUD-5380, in the section titled, "What do I need to document that I am a victim?". Your covered housing provider must give you at least 14 business days (weekends and holidays do not count) to respond to their written request for this documentation.

Will my information be kept confidential? Whenever you ask for or about VAWA protections, your covered housing provider must keep any information you provide about the VAWA violence/abuse or the fact you (or a household member) are a victim, including the information on this form, strictly confidential. This information should be securely and separately kept from your other tenant files. This information can only be accessed by an employee/agent of your covered housing provider if (1) access is required for a specific reason, (2) your covered housing provider explicitly authorizes that person's access for that reason, **and** (3) the authorization complies with applicable law. This information will not be given to anyone else or put in a database shared with anyone else, unless your covered housing provider (1) gets your written permission to do so for a limited time, (2) is required to do so as part of an eviction or termination hearing, **or** (3) is required to do so by law. In addition, your covered housing provider must keep your address strictly confidential to ensure that it is not disclosed to a person who committed or threatened to commit VAWA violence/abuse against you (or a household member).

What if I require this information in a language other than English? To read this in Spanish or another language, please contact CMHA's 504 Coordinator, Lynn Stephens, at SpecialRequests@cintimha.com. You can read translated VAWA forms at https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a#4. If you speak or read in a language other than English, your covered housing provider must give you language assistance regarding your VAWA protections (for example, oral interpretation and/or written translation).

Can I request a reasonable accommodation? If you have a disability, your covered housing provider must provide reasonable accommodations to rules, policies, practices, or services that may be necessary to allow you to equally benefit from VAWA protections (for example, giving you more time to submit documents or assistance with filling out forms). You may request a reasonable accommodation at any time, even for the first time during an eviction. If a provider is denying a specific reasonable accommodation because it is not reasonable, your covered housing provider must first engage in the interactive process with you to identify possible alternative accommodations. Your covered housing provider must also ensure effective communication with individuals with disabilities.

Need further help? For additional information on VAWA and to find help in your area, visit <https://www.hud.gov/vawa>. To speak with a housing advocate, contact YWCA Crisis Intervention at Ph. (513)872-9259; Text (513) 436-3606; CHAT: rc.chat/ywca or Legal Aid Society of Greater Cincinnati at Ph. (513) 241.9400 or toll-free Ph. (800) 582.2682

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

RETURN COMPLETED FORM TO: CMHA 1088 W. Liberty Cincinnati, OH 45214

DATE: _____

1. **Name(s) of victim(s):**

2. **Your name (if different from victim 's):**

3. **Name(s) of other member(s) of the household:**

4. **Name of the perpetrator (if known and can be safely disclosed):**

5. **What is the safest and most secure way to contact you? (You may choose more than one.)**

If any contact information changes or is no longer a safe contact method, notify your covered housing provider.

☐ Phone _____ Phone Number:

Safe to receive a voicemail: ☐ Yes ☐ No

☐ E-mail _____ E-mail Address:

Safe to receive an email ☐ Yes ☐ No

☐ Mail Mailing Address:

Safe to receive mail from your housing provider: ☐ Yes ☐ No

☐ Other Please List:

6. Anything else your housing provider should know to safely communicate with you?

Applicable definitions of domestic violence, dating violence, sexual assault, or stalking:

Domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who lives with or has lived with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Spouse or intimate partner of the victim includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

Dating violence means violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim;
and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship; (ii) The type of relationship; and (iii) The frequency of interaction between the persons involved in the relationship.

Sexual assault means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person's individual safety or the safety of others or
- (2) Suffer substantial emotional distress.

Certification of Applicant or Tenant: By signing below, I am certifying that the information

provided on this form is true and correct to the best of my knowledge and recollection, and that one or more members of my household is or has been a victim of domestic violence, dating violence, sexual assault, or stalking as described in the applicable definitions above.

SIGNATURE

DATE

PRINT NAME OF PERSON COMPLETING FORM

RETURN COMPLETED FORM TO: CMHA 1088 W. Liberty Cincinnati, OH 45214

Public Reporting Burden for this collection of information is estimated to average 20 minutes per response. This includes the time for collecting, reviewing, and reporting. Comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, QDAM, Department of Housing and Urban Development, 451 7th Street, SW, Washington, DC 20410. Housing providers in programs covered by VAWA may request certification that the applicant or tenant is a victim of VAWA violence/abuse. A Federal agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

The Cincinnati Metropolitan Housing Authority (CMHA) released its FY2026-2027 Annual Plan on **January 26, 2026** and is accepting written comments. Pursuant to Section 511 of the Quality Housing and Work Responsibility Act of 1998, CMHA's Draft FY2026-2027 Annual Plan, supporting documents, and proposed updates for the upcoming year are available for public inspection online www.cintimha.com/annual-plan OR during normal business hours (Monday-Friday 8:00 AM – 4:30 PM) at the following Management Office locations:

1627 Western Ave (CMHA Campus)
1635 Western Ave (CMHA Campus)
1088 Liberty St (CMHA Campus)
1044 Liberty St (CMHA Campus)
1621 Linn St (Stanley Rowe)
595 Strand Lane (Findlater)
601 Maple Ave (Maple Tower)
3357 Beekman St (Millvale)
3700 Reading (Redding)
4848 Winneste Ave. (Winton Terrace)
6349 Beechmont Avenue (Scattered Sites)
784 Greenwood Avenue (The President)

CMHA requests written comments no later than Wednesday, March 11, 2026 by close of business to 1627 Western Avenue, Cincinnati, Ohio 45214 or by email to lynn.stephens@cintimha.com.