Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	**U.S. Department of Housing and Urban Development** **Office of Public and Indian Housing**	**OMB No. 2577-0226** **Expires: 03/31/2024**

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: Cincinnati Metropolitan Housing Authority **PHA Code**: OH004
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2023
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 4,566 Number of Housing Choice Vouchers (HCVs) 10461 Total Combined Units/Vouchers 15,027
PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

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

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Plan Elements

B.1 **Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

Y N
- ☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs
- ☒ ☐ De-concentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- ☒ ☐ Financial Resources.
- ☐ ☒ Rent Determination.
- ☒ ☐ Operation and Management.
- ☒ ☐ Grievance Procedures.
- ☐ ☒ Homeownership Programs.
- ☐ ☒ Community Service and Self-Sufficiency Programs.
- ☐ ☒ Safety and Crime Prevention.
- ☐ ☒ Pet Policy.
- ☒ ☐ Asset Management.
- ☐ ☒ Substantial Deviation.
- ☐ ☒ Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS:

Housing Needs of Families on the PHA's Waiting Lists

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

	# of families	% of total families	Annual Turnover
Waiting list total	15394		800
Extremely low income <=30% AMI	15274	99.22%	
Very low income (>30% but <=50% AMI)	226	1.46%	
Low income (>50% but <80% AMI)	27	0.18%	
Families with children	5,715	37.12	
Elderly families	1,118	7.26%	
Families with Disabilities	2561	16.63%	
Race/ethnicity: White	2058	13.36%	
Race/ethnicity: Black	11940	77.56%	
Race/ethnicity: Native American	102	0.66%	
Race/ethnicity: Asian	35	0.22%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR (Includes 21-0 BR)	9677	62.86%	
2 BR	3206	20.82%	
3 BR	1822	11.83%	
4 BR	552	3.58%	
5 BR	109	0.70%	
5+ BR	26	0.16%	

Is the waiting list closed (select one)? No Yes If yes:
How long has it been closed (# of months)?
Does the PHA expect to reopen the list in the PHA Plan year? No Yes
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? No Yes (e.g., specific bedroom sizes may be left open)

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHA-wide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

[X] Section 8 tenant-based assistance

[ ] **Public Housing**

[ ] Combined Section 8 and Public Housing

[ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list lotal	795		1367
Extremely low income <=30% AMI	785	98.74%	
Very low income (>30% but <=50% AMI)	7	.88%	
Low income (>50% but <80% AMI)	3	.38%	
Families with children	338	42.5%	
Elderly families	69	8.7%	
Families with Disabilities	230	28.9%	
Race/ethnicity (White)	129	16.2%	
Race/ethnicity (Black)	655	82.4%	
Race/ethnicity (Asian/Other)	6	0.8%	
Race/ethnicity (Hispanic)	18	2.3%	
Characteristics by Bedroom Size (PH Only)			
1 BR	0	0.0%	
2 BR	0	0.0%	
3 BR	0	0.0%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	

Is the waiting list closed (select one)? [ ] No [x] Yes If yes:

How long has it been closed (# of months)?

39 months – Last Open September '19

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [X] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [X] Yes

(c) The PHA must submit its De-concentration Policy for Field Office review.

DE-CONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION AND ADMSSIONS

De-concentration Plan:

It is the policy of the Cincinnati Metropolitan Housing Authority to provide for de-concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. CMHA does this by allowing its pool of applicants in the asset management program to have unfettered choice from the asset management waitlists for asset management housing. The applicant's choice of housing is based on the applicant's decision as to which location would best provide for their housing in light of available employment, educational opportunities, family and community support.

Additionally, the CMHA will support measures to raise the incomes of households that currently reside in its housing programs through the Family Self Sufficiency programs.

Asset Management Programs:

Prior to the beginning of each fiscal year, the CMHA will analyze the income levels of families residing in each development, the income levels of census tracts in which developments are located, and the income levels of families on the waiting list. Based on this analysis, marketing strategies will be determined and de-concentration incentives implemented. CMHA will audit its site-based waiting list to ensure that its efforts toward marketing and de-concentration of poverty will not adversely impact members of protected classes.

HUD has selected CMHA to participate in the Rental Assistance Demonstration (RAD) Program. Under RAD, properties are funded through a long-term Section 8 Housing Assistance Payment contract. As a result, CMHA will be converting a number of its Asset Management units to Project Based Rental Assistance (PBRAs) under the guidelines of PIH Notice 2012-32, REV-1 and any successor PIH Notices, rules and regulations. CMHA anticipates that RAD conversion will provide a diversity of incomes within the RAD developments.

The waitlist audit will also determine if the waitlist procedure has any disparate impact upon protected classes.

Voucher Management Program:

CMHA will utilize the bonus indicators as set forth in 24 CFR 985.3. These indicators are:

 Half or more of all Section 8 families with children assisted by the PHA in its principal operating area at the end of the last completed PHA fiscal year reside in low poverty census tracts;

 The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area during the last completed PHA fiscal year is at least 2 percentage points higher than the percent of all Section 8 families with children who reside in low poverty census tracts at the end of the last completed PHA fiscal year; or

 The percent of Section 8 families with children who moved to low-poverty census tracts in the PHA's principal operating area over the last two completed PHA fiscal years is at least 2 percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last completed PHA fiscal year.

 State and regional PHAs that provide Section 8 rental assistance in more than one metropolitan area within a State or region make these determinations separately for each metropolitan area or portion of a metropolitan area where the PHA has assisted at least 20 Section 8 families with children in the last completed PHA fiscal year.

VAWA UPDATE

During calendar year 2022, CMHA received **93** submissions for the transfers under the Violence Against Women Act (VAWA); 21 of the transfer requests were from the Asset Management program and 21 requests were from the Voucher Management program. All of these individuals/families sought a transfer from their present residence to another location in order to elude the assailant. CMHA has developed its emergency transfer plan as an addendum to the ACOP. (See Emergency Transfer Plan at Administrative Category 1 Transfer.) CMHA continues to work with the YWCA and Women Helping Women to provide admission preferences points to individuals who are survivors of domestic violence.

Summary of Proposed Changes to the 2023-2024 CMHA HCV Administrative Plan

1. Chapters 3, 5 & 18 - ELIGIBILITY FOR ADMISSION DEBTS OWED

- **Language corrected to be consistent with other parts of the plan to allow for 60 days to pay any outstanding bad debt to CMHA or other HUD funded housing program.**
  - If any member of an applicant family has a bad debt or previous balance due to CMHA or any other federally assisted housing program, they are eligible to apply for the wait list. The family will be placed on the wait list and will be notified, in writing, of the outstanding debt. The family will be removed from the wait list and given 60 days from the day they are pulled to enter into a satisfactory repayment agreement with the entity they owe. Upon signing a repayment agreement, the family will be placed back on the wait list with their same date and sequence time. If a repayment agreement is not established within 60 calendar days, the application will be withdrawn. CMHA will not pursue collection efforts for outstanding debts over 8 years where no judgement for payment has been rendered by a court in accordance with Ohio law.

2. Chapter 4 & 5 - ESTABLISHING PREFERENCES AND MAINTAINING THE WAIT LIST [24 CFR Part 5, Subpart D; 982.54(d)(1), 982.204, 982.205, 982.206]

- Language added to include the following preferences to Chapters 4&5:
  - Referral from Asset Management/LIPH or Touchstone Management Services when a family or individual cannot be housed because of extenuating circumstances. ** 80 points
  - Removal of the veteran preference due to VASH program.

3. Chapter 21 – FAMILY SELF SUFFICIENCY

- Language added to meet the program participation rules implemented by HUD and program objectives and outreach procedures.

The Cincinnati Metropolitan Housing Authority's FSS program seeks to help families make progress toward economic security by supporting the family's efforts to:

- **Increase their earned income;**
- **Build financial capability;**
- **Achieve their financial goals**

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

- Introduce FSS to all families who are eligible to participate with the understanding that the commitment to change "begins from within."
- Implement a needs assessment to identify each family's strengths and barriers. Establish interim goals that lay the foundation for the final goals of economic self-sufficiency of each family joining FSS.

CMHA's standards for completion of the FSS Contract of Participation include:

- To become independent of TANF assistance;
- To be in good standing with no current or anticipated debt to either the Housing Choice Voucher (HCV) Program or to the Landlord;
- To seek and maintain suitable employment based on the skills, education and job training of the individual and available job opportunities in the area;
- To complete the Individual Service Plan goals set by the participant;
- To establish interagency partnerships to achieve high quality and comprehensive service delivery to all members of a family with long-term results.

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

FINANCIAL RESOURCES

Financial Resources: **Planned Sources and Uses**		
Sources	**Planned $**	**Planned Uses**
1. **Federal Grants (CY 2022 grants)**		
a) Public Housing Operating Fund	$26,857,808.00	
b) Public Housing Capital Fund	$10,905,992.33	
c) Annual Contributions for Section 8 Tenant-Based Assistance	$83,071,501.00	
d) Other Federal Grants (list below)	$164,350.71	Choice Neighborhood Planning Grant
e) Family Self Sufficiency	$477,456.00	Section 8 Supportive Services
f) NSP2		NSP2 development
2. Prior Year Federal Grants (unobligated funds only) (list below)		
a) Regional Opportunity Counseling	$0	Section 8 Tenant Based Assistance
b) Family Self Sufficiency	$0	Section 8 Supportive Services
c) Resident Opportunity and Self-sufficiency Grants	$0	Public Housing Supportive Services
d) Capital	$3,401,334.39	Public Housing Capital Improvements
e) HOPE VI Revitalization	$0	
3. Public Housing Dwelling Rental Income		
a) Rental Income	$8,752,121.85	Public Housing Operations
4. Other income (list below)		
a) Excess Utilities	$0	Public Housing Operations
b) Non-dwelling Rental	$15,400.00	
c) Interest & Other Income	$7,394.97	
5. Non-federal sources (list below)		
Total resources	$133,653,359.25	

Summary of Proposed Changes to the 2023-2024 CMHA Admissions and Continued Occupancy Policy and Lease Agreement

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

Sections to be Amended:

SECTION II: ELIGIBILITY FOR ADMISSION AND PROCESSING OF APPLICATIONS

CMHA has had success with remote hearings, as permitted by PIH 2020-32, and finds that the virtual platform should be the norm, except in cases where a party requests an in-person hearing.

G. Due Process Rights for Applicants

3. Remote Informal Hearings:

Hearings shall be conducted remotely, via video teleconferencing or telephonically, absent a request by a party for an in-person hearing.

SECTION II: ELIGIBILITY FOR ADMISSION AND PROCESSING OF APPLICATIONS

CMHA is has conducted an internal review of policies regarding public housing tenants seeking to occupy properties owned by Touchstone Property Services. In order to ensure tenants with outstanding debts pay off these balances, CMHA is amending the eligibility policy to require public housing tenants seeking to occupy Touchstone properties to either pay off the outstanding balance in full or execute a repayment agreement enforceable by the Tenant's new lease with Touchstone Property Services.

CMHA Legal has determined that this change does *not* constitute a significant amendment of the ACOP, and as such the 45-day public notice period is not required.

This proposed change adds a Subsection (J) to Section II of the CMHA ACOP. Upon a vote of the Board, Section II(J) shall be added to the ACOP and shall read as follows:

J. Debts Owed by Tenants Seeking to Occupy Touchstone Property Services Units.

Tenants of CMHA public housing seeking to occupy Touchstone Property Services, Inc. units shall satisfy or agree in writing to satisfy all outstanding debts to CMHA prior to qualification. Tenants with outstanding balances who seek to occupy Touchstone properties shall either 1). Pay off the balance owed CMHA in full; or 2). Execute a repayment agreement with CMHA. The repayment agreement, attached to the new CMHA Policy regarding bad debts and transfers, shall require tenants to pay off outstanding debt to CMHA on a monthly basis. Per the terms of the Repayment Agreement, the Agreement is enforceable against the Tenant's new lease with Touchstone Property Services. Failure to comply with the terms of the agreement shall constitute a violation of the Tenant's new lease with Touchstone Property Services and may serve as grounds for eviction.

SECTION V: TRANSFER POLICY

CMHA has conducted an internal review of CMHA transfer policy to ensure all elements of the policy comply with the categories set by HUD. CMHA Legal has determined that this change does *not* constitute a significant amendment of the ACOP, and as such the 45-day public notice period is not required.

The proposed change amends Section V(B) of the CMHA ACOP to read as follows:

A. Types of Transfers

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

1. Emergency Transfers are mandatory. 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. Residents approved for an emergency transfer due to building conditions will be given priority placement under the Emergency Transfer Category. Residents will receive one transfer offer. Refusal of the transfer offer, without good cause, will result in lease termination.

   Emergency transfers shall take priority over new admissions.

2. Category 1: The following administrative transfers will be deemed Category 1 Transfers: They include mandatory transfers to: provide housing options to residents who are victims of federal hate crimes[1] or extreme harassment; ***or to witnesses of crimes,[2] or to victims of domestic violence, dating violence, stalking, or sexual assault [3], or to*** alleviate verified disability problems of a serious (but not life-threatening) nature; permit

[1] Following consultation with Housing Opportunity Made Equal that such a transfer is appropriate.
[2] Following consultation with and upon recommendation of the local prosecutor that such a transfer is appropriate and recommended.
[3] 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.

portfolio conversion, modernization or demolition of units; or to permit a family that requires a unit with accessible features to occupy such a unit. Residents will receive one transfer offer.

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.

Emergency and Urgent transfers 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).

3. 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. Residents will receive one transfer offer. Refusal of the 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. The Category 1 Administrative transfers will take priority over new admissions.

4. 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. These transfers are mandatory. Residents will receive one transfer offer. Refusal of the offer, without good cause, may result in the removal of the household from the transfer list for voluntary transfers.

   If a family's size is between the smallest and largest size permissible for the unit, the family may request a transfer, but it shall be considered a Category 4 transfer (see below).

5. Category 4 Administrative Transfers are transfers within sites or between sites to correct and avoid concentration of the most economically and socially deprived families or to correct occupancy standards (voluntary if the family is between the minimum and maximum occupancy standard but the family requests a transfer, e.g. to permit older children of the opposite sex to have separate bedrooms). Approval for Category 4 transfers will only be reviewed at the time of Resident's annual recertification.

   Residents will receive one transfer offer. 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.

   Category 4 Administrative transfers will not take priority over new admissions. They will be processed at the rate of one transfer to four admissions.

Whenever feasible, transfers will be made within a resident's preferred geographical area.

Section VIII: Family Self-Sufficiency Program

FAMILY SELF SUFFICIENCY

[24 CFR 984]

A. FSS PROGRAM OBJECTIVES

The Cincinnati Metropolitan Housing Authority's FSS program seeks to help families make program toward economic security by supporting the family's efforts to:

- Increase their earned income;
- Build financial capability;
- Achieve their financial goals

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

- Introduce FSS to all families who are eligible to participate with the understanding that the commitment to change "begins from within."
- Implement a needs assessment to identify each family's strengths and barriers. Establish interim goals that lay the foundation for the final goals of economic self-sufficiency of each family joining FSS.
- CMHA's standards for completion of the FSS Contract of Participation include:
- To become independent of TANF assistance;
- To be in good standing with no current or anticipated debt to either the Housing Choice Voucher (HCV) Program or the Landlord;
- To seek and maintain suitable employment based on the skills, education and job training of that individual and available job opportunities in the area;
- To complete the Individual Service Plan goals set by the participant.
- Establish interagency partnerships to achieve high quality and comprehensive service delivery to all members of a family with long-term results.

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

Section XVII: Definitions of Terms Used in This Statement of Policies

CMHA has added language provided by Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022) to the definition of Domestic Violence:

13. Domestic Violence (i) felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim; (ii) by a person with whom the victim shares a child in common; (iii) by a person who is co-habiting with or has co-habited with the victim as a spouse or intimate partner . . .

Domestic Violence may include technological abuse, economic abuse, and a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim that may or may not constitute criminal behavior. CMHA will not discriminate against any person for exercising or enjoying, or aiding or encouraging others in the exercise or enjoyment of, VAWA housing rights or for opposing an act or practice made unlawful by VAWA.

45. Spouse - Spouse means the husband or wife of the head of the household including "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 relationship, and the frequency of interaction between the persons involved in the relationship."

46. Stalking – any 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.

SIGNIFICANT AMENDMENT AND STANDARD DEVIATION

1. Definition of Substantial Deviation/Modification

The definition of Substantial Deviation/Modification of CMHA's Plan is amended to exclude the following items:

"Significant Amendment" is defined as follows:
A significant amendment or modification to the annual plan is a change in the major strategies to address Housing Needs or changes in Admissions & Occupancy. For the purpose of the CFP, a proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed finance proposal are considered significant amendments to the CFP 5-Year Action Plan

The following are not considered significant amendments:

1. Changes in Public Housing Admissions & Occupancy Policies or the Section 8 Administrative Plan that are not inconsistent with the Annual Plan.
2. Changes in Public Housing Admissions & Occupancy Policies or the Section 8 Administrative Plan that are required by federal, state, or local authorities, including laws and regulations.
3. A minor change in the planned uses of financial resources (e.g., small shifts within or between different funding categories).
4. Changes in the plan resulting from consultation with Consolidated Plan authorities including the City of Cincinnati and Hamilton County, Ohio.
5. Changes that are the result of the loss of anticipated funding to support a specific proposed activity or program.
6. Changes that are due to factors outside of CMHA's control such as natural or man-made disasters that require the redirection of resources to address emerging issues.
7. Technical amendments to correct grammar and spelling mistakes; to adjust the language in the plan document to match the intended board policy as documented by board resolutions and minutes that inadvertently omitted or misstated in the existing plan document; or to update the plan to provide more accurate information that does not impact policies such as corrections to reports on past activities and statistics on housing and population characteristics.
8. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the conversion will include use of additional Capital Funds;
9. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
10. Changes to the financing structure for each approved RAD conversion.
11. Additions of non-emergency work items not exceeding 25% of the CFP budget (items not included in the Annual statement or 5-year Action plan) or change in use of replacement reserve funds under Capital Fund.

"Substantial Deviation" is defined as follows:
1. Any change with regard to demolition or disposition, designation, homeowner programs or conversion activities.
2. Fundamental alteration of the goals, mission or objectives of CMHA.

New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y	N	
☒	☐	Hope VI or Choice Neighborhoods.
☒	☐	Mixed Finance Modernization or Development.
☒	☐	Demolition and/or Disposition.
☒	☐	Designated Housing for Elderly and/or Disabled Families.
☒	☐	Conversion of Public Housing to Tenant-Based Assistance.
☒	☐	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
☐	☒	Occupancy by Over-Income Families.
☐	☒	Occupancy by Police Officers.
☐	☒	Non-Smoking Policies.
☒	☐	Project-Based Vouchers.
☒	☐	Units with Approved Vacancies for Modernization.
☒	☐	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

HOPE VI OR CHOICE NEIGHBORHOODS:

HOPE VI:

CMHA is in the early stages of planning developing the remaining vacant parcel in the Hope VI neighborhood of Lincoln Ct and Laurel Homes. CMHA is planning to develop these vacant parcels either through self-development or with a development partner. Preliminary plan includes single family homes (row style) at AMI 60-115% and traditional market rate sales. The exterior will match as closely as possible the exiting neighborhood.

CHOICE NEIGHBORHOODS:

The U.S. Department of Housing and Urban Development's Choice Neighborhoods program was first funded by Congress in 2010 replacing and expanding on the HOPE VI program. Choice Neighborhoods has three goals: 1) to transform distressed housing, 2) to support positive outcomes for families in the targeted neighborhood, and 3) to transform neighborhoods of poverty into viable neighborhoods with access to well-functioning services. Choice Neighborhood parameters include the requirement of one-for-one replacement, resident involvement, right-to-return if lease compliant, activities and services to promote self-sufficiency, and the inclusion of energy-efficient design principles. There are two types of Choice Neighborhoods grants: a) Planning grants assist selected communities in creating a plan for transformation and to build community support, b) Implementation grants are for those communities who already have a Transformation Plan, community support and have proven the capacity to leverage additional financial resources and resources to be able to begin the transformation of the community.

In 2020, CMHA partnered with the Stanley Rowe Resident Council, Residents from Stanley Rowe Towers, Stanley Rowe Rowhouses, Liberty Street Apartments and over 35 local organizations to develop a Choice Neighborhoods Planning Grant application that was submitted to HUD on September 13, 2020 requesting funds to develop a Transformation Plan for the West End. On December 16, 2020, the U.S. Department of Housing and Urban Development notified CMHA that the community was awarded a Fiscal Year 2020 Choice Neighborhoods Planning Grant in the amount of $410,000 to develop a Transformation Plan for the West End and to revitalize the following target public housing sites: Stanley Rowe Towers (AMP 215) 358 public housing units, Stanley Rowe Rowhouses (AMP 214) 66 family units and Liberty Street Apartments (AMP 214) 130 family units. The Choice Neighborhoods Planning Grant award period of performance start date is December 16, 2020 with an end date of March 31, 2023, during which CMHA will lead a collaborative planning process that includes J-RAB, the Stanley Rowe Resident Council, Residents from Stanley Rowe Towers, Stanley Rowe Rowhouses and Liberty Street Apartments, as well as neighborhood partners and local leaders. The West End Transformation Plan will identify strategies to implement public housing revitalization, the coordination and design of supportive services, and neighborhood-level planning to enhance a range of neighborhood assets.

CMHA completed the two-year collaboration and submitted a Choice Neighborhoods Transformation Plan to HUD on December 16, 2022. The West End Choice Neighborhoods Transformation Plan reflects the voice and vision of the West End Neighborhood as heard through public housing resident assessments, focus groups, interviews, as well as resident and neighborhood meetings and workshops held in 2021/2022.

As the next step in the Choice Neighborhood process, CMHA issued an RFQ inviting Developers to submit development qualifications as Co-Developer under the West End Choice Neighborhoods Initiative. Respondents submitted information concerning capacity, qualifications, and experience as outlined in the RFQ. From that evaluation, it was determined that McCormack Baron Salazar would be joining the team in the next phase.

To build on these efforts, CMHA plans to collaborate with the Stanley Rowe Resident Council, Residents from Stanley Rowe Towers, Stanley Rowe Rowhouses, Liberty Street Apartments and Community Partners to apply for a Choice Neighborhoods Implementation Grant in 2023 and any other HUD funding available to implement the West End Transformation Plan that was developed as part of the collaborative Choice Neighborhoods planning process and to revitalize the Stanley Rowe Towers, Stanley Rowe Rowhouses and Liberty Street Apartments public housing sites. CMHA may also pursue other funding in order to leverage HUD funding.

MIXED FINANCE MODERNIZATION OR DEVELOPMENT

CMHA will continue to develop affordable units over the next several years, consistent with:

- CMHA's strategic goal of developing affordable housing units.
- Cooperation agreements with Hamilton County and the City of Cincinnati.
- CMHA's long term viability assessment of public housing units.

In the development of these units, CMHA will adhere to the following principles:

- Assessment of quality and condition of units for replacement with new construction to meet housing needs.
- Provision of marketable amenities and encouragement of neighborhood amenities.
- Provision of choice and opportunity
- Leveraging of resources, tying into community planning and partnerships where possible
- Provision of comprehensive plan/solution for community/site revitalization which includes people, housing and neighborhoods and partner where possible.
- Provision of housing opportunities and choice for income tiers of 0-120% of Area Median Income (AMI) for seniors, families and other populations.
- Creation of synergistic economic development and economic inclusion with & within communities.

Further, CMHA will consider the following for future developments:

- Feasibility of non-smoking developments, create partnerships to develop assisted living units, plan ongoing senior/family developments and continually evaluate the special needs populations that need served (all within the 0 -120 % of AMI).
- Assessment of CMHA units and properties, while pursuing the forward movement of development goals.
- Availability and feasibility of alternative funding streams - review, analyze and plan new housing programs.
- Synergist partnerships.
- Community and waitlist needs.
- Creation of affordable single-family homeownership programs.
- Consideration of commercial retail and office space for mixed use development
- CMHA may evaluate the 811 Program for the mixed finance projects.
- CMHA may evaluate the use of Federal Historic Preservation Credits, Ohio State Preservation Credits and New Market Tax Credits.

CMHA will utilize various methods of public and private financing, and will consider the recommendations of the Hamilton County Housing Study in this initiative. These units will be developed using a variety of development methods (i.e. new construction, acquisition, acquisition/rehabilitation, etc.).

Family Development(s) - In addition to specific development plans outlined below, CMHA plans to develop one or more developments of 50-120 affordable housing units for families within Hamilton County including the City of Cincinnati. CMHA is evaluating multiple approaches to accomplish this objective such as home ownership, lease-purchase, rental, and/or a combination of these.

Senior Development(s) - In addition to specific development plans outlined below, CMHA is preparing to begin construction on 42 units of affordable senior housing on Logan Street. Logan Commons will include a partnership with a senior service provider to bring much needed services directly to residents.

Fairmount / English Woods - CMHA will undertake development efforts for the English Woods site in Fairmount. This plan includes the production of family and senior developments in North Fairmount, assistance to single family homeowners and development on the former English Woods site as well as the demolition and/or rehabilitation of Marquette Manor. CMHA will apply for various funding sources to implement the transformation plan for the Fairmount/English Woods subject area.

CMHA also intends to enter into a Master Development Agreement with a private development company for the transformation of the northern 40 acres of English Woods. The terms of the agreement may specify the construction of new single-family homes, multi-family homes, and recreational amenities. The agreement will be presented to the Board of Commissioners for final approval once the terms have been specified.

Lincoln Heights – CMHA is considering development of up to 80 family units through renovation or replacement of under positioned buildings.

Pendleton – CMHA plans to develop 40-70 affordable units on vacant land in the Pendleton area. Bennett Point is a 56-unit new construction mixed income property project with commercial laundry space located in Pendleton and is currently under construction. Bennett Point applied for and received 9% Low-Income Housing Tax Credits.

Walnut Hills – CMHA is considering the replacement of 12 units of Low-Income Public Housing units in the Rockdale development in Walnut Hills.

North College Hill – CMHA is considering the development of affordable units on vacant land in North College Hill.

Avondale – CMHA is considering the development and/or rehabilitation of affordable units in Avondale. CMHA has plans for the rehabilitation of the Beechwood, Maple Tower, President and Redding properties through RAD Conversion.

Over-the-Rhine- CMHA is considering a partnership for the construction of 42 new affordable multifamily housing units on Logan Street. Logan Commons will include a partnership with a senior service provider to bring much needed services directly to residents. On a separate project, CMHA is evaluating the redevelopment of our Race Street properties to convert first floors back to retail and rehabilitate the residential units to senior affordable housing.

West End Properties – CMHA will continue to develop strategies for the creation of a home ownership both affordable and possible market on vacant parcels located in the West End neighborhood of Cincinnati, owned by CMHA. CMHA issued an RFQ for development partners for up to 65 lots in the West End. CMHA is currently evaluating those proposals. CMHA is reviewing a full modernization of the Kindel property located in the West End.

Workforce Housing - CMHA intends to develop up to 60 units of workforce housing within the City of Cincinnati and/or Hamilton County. CMHA is considering using the Walnut Hills, Pendleton and North College Hill

Replacement Units – As any planned demolition or disposition is undertaken, CMHA will seek to replace these units 1 for 1 in the same neighborhoods when feasible. Some neighborhoods that CMHA may undertake these activities in include Norwood, Reading, Anderson Township, Sycamore Township, Colerain Township, Blue Ash, Forest Park, Deer Park, Green Township English Woods, College Hill and Harrison.

RENTAL ASSISTANCE DEMONSTRATION

Rental Assistance Demonstration Program and Section 18 Blending – Over the next several years, CMHA plans to convert all of its public housing through the Rental Assistance Demonstration (RAD) and Section 18 Programs. CMHA may use other HUD tools, including the RAD Transfer of Assistance program to preserve the Agency's affordable housing units and invest in replacement units. RAD Transfer of Assistance allows CMHA to transfer the housing assistance from existing assisted units that are not viable to new units to provide long-term affordability for those new units.

CMHA was originally awarded a RAD Portfolio Award by HUD on June 11, 2018. This award reserved RAD conversion authority for 4,415 of CMHA's public housing units. HUD subsequently issued a revised Portfolio Award on Sept. 15, 2019 in accordance with the revised RAD Notice, H-2019-09 PIH-2019-23 (HA). This notice converted all existing Multiphase awards to Portfolio awards and implemented changes to the requirements for existing awards.

As a result, CMHA will be converting a number of its Asset Management units to either Project Based Vouchers or Project Based Rental Assistance (PBRAs) under the guidelines of H-2019-09 PIH 2019-23, Notice PIH 2018-04 and any successor PIH Notices, rules and regulations. Upon conversion, CMHA will adopt resident rights, participation, waiting list and grievance procedures as required by HUD. CMHA will comply with all fair housing and civil rights requirements.

As of December 2022, CMHA has active Commitments to Enter into a Housing Assistance Payment (CHAPs) on four properties: Beechwood (146 units), Riverview San Marco (131 units), Horizon Hills (30 units) and Marianna Terrace (74 units).

The RAD and Section 18 Blending programs were designed by HUD to assist in addressing the capital needs of public housing by providing housing authorities with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware, that upon conversion, CMHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that CMHA may also borrow funds to address their capital needs. CMHA may also decide to contribute Operation Reserves available at the time of conversion and Capital Funds in the amount of $10,500,000 towards the conversion. (ASK JOE FOR AMOUNT)

The below table outlines the various RAD conversion transactions CMHA is undertaking or plans to undertake in the next several years. Please note that the details of each plan are subject to change as property needs and financing availability dictate. CMHA will abide by all applicable regulations regarding public notifications and resident outreach in its planning processes for each property.

CMHA has successfully converted 756 units to RAD and/or the RAD/Section 18 Blend program across several developments. These include Baldwin Grove, Sutter View, Evanston, Pinecrest, Park Eden, Horizon Hills and Marianna Terrace. The LIHTC Compliance Period for City West recently expired, and, as a result, CMHA is considering converting these units to RAD or the RAD/Section 18 Blend as well.

CFFP Debt

CMHA currently has debt under the Capital Fund Financing Program with a principal balance of $5,928,135 at 6/30/2022. CMHA makes a monthly payment on this debt on an amortization schedule with a final payoff date of September 1, 2026. In addition to the monthly payments, CMHA must also have to pay a share of this debt related to removal of units from public housing. CMHA's request to remove 1,181 units without prepayment of CFFP debt was approved on March 2, 2017. Since receiving this approval CMHA has removed a total of 649 units from public housing and therefore can remove approximately 532 more public housing units without prepayment of CFFP debt. CMHA will continue working with its lender to address outstanding debt issues.

Development #1

Name of Public Housing Development: **Scattered Sites**	Pic Development ID: **OH004-000205**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **24**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$66,528** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	4	4	
Two Bedroom	12	12	
Three Bedroom	8	8	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #2

Name of Public Housing Development: **Findlater Gardens**	Pic Development ID: **OH004-000210**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
653	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$1,810,116** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	98	98	
Two Bedroom	210	210	
Three Bedroom	214	214	
Four Bedroom	111	111	
Five Bedroom	17	17	
Six Bedroom	3	3	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #3

Name of Public Housing Development: **Stanley Rowe and Liberty St. Apts.**	Pic Development ID: **OH004-000214**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **554**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$1,535,688** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	26	26	
One Bedroom	161	161	
Two Bedroom	255	255	
Three Bedroom	101	101	
Four Bedroom	9	9	
Five Bedroom	2	2	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #4

Name of Public Housing Development: **Maple Tower**	Pic Development ID: **OH004-000211**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **120**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$332,640** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	

One Bedroom	114	114	
Two Bedroom	6	6	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #5

Name of Public Housing Development:	Pic Development ID:	Conversion Type (i.e., PBV or PBRA):	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):
Beechwood	**OH004-000211**	**PBRA/Section 18 PBV**	**N/A**
Total Units: **149**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$413,028** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	16	13	
One Bedroom	132	132	
Two Bedroom	1	1	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #6

Name of Public Housing Development:	Pic Development ID:	Conversion Type (i.e., PBV or PBRA):	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):
Winton Terrace	**OH004-000209**	**PBRA/Section 18 PBV**	**N/A**
Total Units: **608**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$1,685,376** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	86	86	
Two Bedroom	274	274	
Three Bedroom	147	147	
Four Bedroom	99	99	
Five Bedroom	2	2	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #7

Name of Public Housing Development: **Millvale**	Pic Development ID: **OH004-000217**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **468**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$1,297,296** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	32	32	
Two Bedroom	208	208	
Three Bedroom	179	179	
Four Bedroom	43	43	
Five Bedroom	1	1	
Six Bedroom	5	5	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #8

Name of Public Housing Development: **San Marco**	Pic Development ID: **OH004-000212**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **30**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$83,160** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	30	30	
Two Bedroom	0	0	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #9

Name of Public Housing Development: **Riverview**	Pic Development ID: **OH004-000212**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **110**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$304,920** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	28	0	

One Bedroom	81	100	Unit reconfiguration (studio to one-bedroom)
Two Bedroom	1	1	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #10

Name of Public Housing Development: **The Redding**	Pic Development ID: **OH004-000213**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **100**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$277,200** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	7	7	
One Bedroom	90	90	
Two Bedroom	3	3	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #11

Name of Public Housing Development: **Marquette Manor**	Pic Development ID: **OH004-000218**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **140**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$388,080** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	140	140	
Two Bedroom	0	0	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #12

Name of Public Housing Development: **The President**	Pic Development ID: **OH004-000213**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **96**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$266,112** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	23	23	
One Bedroom	72	72	
Two Bedroom	1	1	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #13

Name of Public Housing Development: **Scattered Sites – Bundle H**	Pic Development ID: **OH004-000201**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **28**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$677,616** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	6	6	
Two Bedroom	10	10	
Three Bedroom	12	12	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #14

Name of Public Housing Development: **Scattered Sites – Bundle J**	Pic Development ID: **OH004-000203**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **75**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$207,900** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	2	2	
One Bedroom	36	36	
Two Bedroom	36	36	
Three Bedroom	1	1	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #15

Name of Public Housing Development: **Scattered Site Central – Bundle K**	Pic Development ID: **OH004000201 OH004000203 OH004000204**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **60**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$166,320** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	24	24	
Two Bedroom	30	30	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #16

Name of Public Housing Development: **Scattered Site Fair Southeast - Bundle I**	Pic Development ID: **OH004000202 OH004000203**	Conversion Type (i.e., PBV or PBRA): **PBRA/Section 18 PBV**	Transfer of Assistance: (if yes, please put the location if known and # of units transferring): **N/A**
Total Units: **76**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$210,672** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	52	52	
Two Bedroom	24	24	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #17

Name of Public Housing Development:	Pic Development ID:	Conversion Type (i.e., PBV or PBRA):	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):
Scattered Site Southwest – Bundle M	**OH004000205 OH004000206**	**PBRA/Section 18 PBV**	**N/A**
Total Units: **80**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$221,760** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	1	1	
Two Bedroom	43	43	
Three Bedroom	20	20	
Four Bedroom	10	10	
Five Bedroom	4	4	
Six Bedroom	2	2	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

Development #18

Name of Public Housing Development:	Pic Development ID:	Conversion Type (i.e., PBV or PBRA):	Transfer of Assistance: (if yes, please put the location if known and # of units transferring):
City West	**OH004000301 OH004000302 OH004000303 OH004000304 OH004000305 OH004000306 OH004000307**	**PBRA/Section 18 PBV**	**N/A**
Total Units: **624 (334 ACC)**	Pre: RAD Unit Type (i.e., Family, Senior, etc.): **Family**	Post-RAD Unit type if different (i.e., Family, Senior, etc.): **Family**	Capital Fund Allocation of Development: **$9,25,683** (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	
One Bedroom	105	105	
Two Bedroom	294	294	
Three Bedroom	213	213	
Four Bedroom	12	12	
Five Bedroom	0	0	
Six Bedroom	0	0	
(if performing a Transfer of Assistance)	(Explain how transferring waiting list) N/A		

RESIDENT RIGHTS, PARTICIPATION, WAITING LIST AND GRIEVANCE PROCEDURES UNDER RAD (Attachment)

2. **No Re-screening of Tenants upon conversion**. Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

3. **Right to Return**. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to the development once rehabilitation or construction is completed.

4. **Phase-in of Tenant Rent Increases**. If a tenant's monthly rent increases by more than the greater of 10 percent or $25 purely as a result of conversion, the rent increase will be phased in over 3 years. To implement this provision, HUD is waiving section 24 CFR 880.201 to the limited extend necessary to allow

for the phase-in of tenant rent increases.

5. **Resident Participating and Funding**. Residents of covered projects converting assistance to PBRAs will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing). In addition, CMHA will continue to provide $25 per occupied unit annually for resident participation.

6. **Resident Procedural Rights.**

- **Termination Notification**. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR §880.607, related to owner termination of tenancy and eviction the termination procedure for RAD conversion to PBRA will require that CMHA provide adequate written notice of termination of the lease which shall not be less than:
  - **A reasonable period of time, but not to exceed 3 days:**
    - If the health or safety of other tenants, CMHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
    - In the event of any drug-related or violent criminal activity or any felony conviction;
    - 14 days in the case of nonpayment of rent; and
    - 30 days in any other case, except that if a State of local law provides for a shorter period of time, such shorter period shall apply.

7. **Grievance Process**. In addition to program rules that require that tenants are given notice of covered actions under 24 CFR Part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD is incorporating resident procedural rights to comply with the requirements of section 6 of the Act. RAD will require that:

   1. Residents be provided with notice of the specific grounds of the proposed owner adverse action, as well as their right to an informal hearing with CMHA (as owner);
   2. Residents will have an opportunity for an informal hearing with an impartial member of CMHA's staff (as owner) within 90 days of the request for an informal hearing;
   3. Residents will have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others make statements at the hearing, and to examine any regulations and any evidence relied upon by the owner as the basis for the adverse action. With reasonable notice at least 48 hours prior to the to the hearing that resident may request that CMHA (as owner), prior to hearing and at the residents' own cost, resident may copy any documents or records related to the proposed adverse action; and
   4. CMHA (as owner) provides the resident with a written decision within 30 days of the hearing stating the grounds for the adverse action, and the evidence CMHA (as owner) relied on as the basis for the adverse action.
   5. CMHA (as owner) will be bound by decisions from these hearings, except if the:
      - Hearing concerns a matter that exceeds the authority of the impartial party. Decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law.
      - If CMHA (as owner) determines that it is not bound by a hearing decision, CMHA must notify the resident within 45 days of this determination, and of the reasons for the determination.

8. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID exclusion after conversion, in accordance with regulations at 24 CFR § 960.255. After conversion, no other tenants will be eligible to receive the EID. If a tenant receiving the EID exclusion undergoes a break in employment, ceases to use the EID exclusion, or the EID exclusion expires in accordance with 24 CFR §960.255, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision. Instead, the rent will automatically be adjusted to the appropriate rent level based upon tenant income at that time.

9. **Capital Fund Education and Training Community Facilities (CFCF) Program.** CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as "PHA residents" for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents.

10. **Relocation Plan.** CMHA anticipates a need for relocation for Sutter View AMP 218. At this time CMHA does anticipate the need for relocation at the following developments; Marianna Terrace AMP 204, Scattered Sites AMP 205 24 units, Findlater Gardens AMP 210, Evanston AMP 211, Liberty St Apt AMP 214, and Pinecrest AMP 216. CMHA has developed a master relocation plan that will be used to develop a site-specific relocation plan. CMHA will follow both the URA and RAD relocation requirements. The displacement of our residents will be minimized to the greatest extent feasible based upon our construction schedule.

11. **Definition of Substantial Deviation/Modification**

The definition of Substantial Deviation/Modification of CMHA's Plan is amended to exclude the following items:

12. **Definition of Substantial Deviation/Modification**

The definition of Substantial Deviation/Modification of CMHA's Plan is amended to exclude the following items:

13. Definition of Substantial Deviation/Modification

The definition of Substantial Deviation/Modification of CMHA's Plan is amended to exclude the following items:

Planned Funding Sources - CMHA will accomplish the development of affordable housing by using variety of different funding sources including but not limited to:

- Replacement Housing Factor Funds (RHF)
- Demolition/Disposition Transitional Funding (DDTF)
- Capital Grant Funds
- Public Housing Operating Reserves (as permitted)
- Low Income Housing Tax Credits (LIHTC)
- Federal Home Loan Bank (FHLB) grants and loans
- Ohio Housing Finance Agency (OHFA) grants and loans
- Choice Neighborhood Implementation Grants
- Bond funds (as required for 4% LIHTC)
- Private grants and loans
- 811 Program
- HOME funds
- CDBG funds
- HUD FHA Loans
- Conventional Loans
- And other funding sources as appropriate and available

Non-dwelling Space Development - CMHA is considering repurposing existing under-used, non-dwelling space to further resident employment and training. The goals of this undertaking would be to improve outcomes for tenants and create additional revenue for CMHA. In new development efforts, CMHA is also considering the development of Capital Assets that will support employment and training initiatives for residents. This includes the planned commercial development on the site of Cary Crossing.

Accessibility Improvements - CMHA is planning on converting additional units from its existing and future asset management units to 504 compliance standards. These units will be located throughout Hamilton County providing additional accessibility options for the families we serve. The plan is to convert the units into fully 504 compliant units where feasible. All new development efforts will meet or exceed HUD's 504 Accessibility requirements where feasible.

Density Reduction - CMHA is planning to conduct a feasibility study that will address density reduction/de-concentration of its larger developments.

DEMOLITION AND/OR DISPOSITION

The following table is a planning tool that CMHA uses to inform HUD and other stakeholders of potential considerations for future demolition/disposition and replacement of properties in the portfolio. CMHA has established a perpetual annual physical inspection and assessment process to conduct reviews of the entire portfolio over a four-year period. Based on the comprehensive assessment recommendations and findings, CMHA can make informed and thoughtful recommendations to HUD on the possible demolition or disposition of properties. As any planned demolition or disposition is undertaken, CMHA will seek to replace the units in the same communities as long as the neighborhood is below city/county average poverty rates, are potentially in an area of opportunity, and/or the long-term residents of the units are satisfied connected with the neighborhood and view the community as home, or are part of a neighborhood revitalization plan. The objective is to provide quality and safe housing that operates efficiently and effectively for our residents. Multiple approaches are being evaluated to continue to deliver quality sustainable housing units and to pursue the perseveration of sustainable affordable housing units that provide choice and opportunity for our residents. To accomplish this objective and after due diligence, concepts such as acquisition/rehabilitation, new construction for replacement units as well as conversion of rental single-family homes to homeownership and review of other funding programs are being considered and implemented. Some of these options are discussed throughout this annual plan.

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

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

Column 2 describes whether CMHA is pursuing demolition or disposition.

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

Column 4 provides a date that Column 3 indicated status is to be achieved or has been achieved, for example if the Column 3 status indicates "planned application", then the date in section 4 reflects estimated date the CMHA plans to submit the application.

Column 5 and 6 speak to how many units and whether the entire development or portion of the development is impacted.

Column 7 provides an estimated start and end date of when the activity of demolition/disposition may begin after the agency has an approved application. The first step of any activity begins with potential relocation and procurement of all funding sources and contractors.

Demolition/Disposition Activity Description Table

	1a.	1b.	2	3	4	5	6	7	8
AMP	**Development**	**Dev #**	**Type**	**Status**	**Date**	**Effected Area**		**Timeline**	**Narrative**
201	1708-1726 Race Street	OH004-39	Demo/ Dispo	Planned	4/24	23 Units	Partial	4/23-4/24	CMHA does not plan to reduce its housing unit count
201	122 & 130 McMicken Ave	OH004-40	Dispo	Planned	4/24	5 Units	Partial	4/23-4/24	CMHA does not plan to reduce its housing unit count
208	415-437 Rockdale	OH004-40	Demo/ Dispo	Planned	7/24	12 Units	Partial	8/23-8/24	CMHA does not plan to reduce its housing unit count
201	4048 Ledgewood	OH004-39	Dispo	Planned	7/24	12 Units	Partial	8/23-8/24	CMHA does not plan to reduce its housing unit count
208	415-417 Catherine	OH004-23	Demo/Dispo	Planned	7/24	4 Units	Partial	10/23-10/24	CMHA does not plan to reduce its housing unit count
208	418 Kasota	OH004-40	Demo/Dispo	Planned	7/24	7 Units	Partial	10/23-10/24	CMHA does not plan to reduce its housing unit count
211	3460 Hallwood Lane	OH004-19	Dispo	Planned	4/24	Land Only	Partial	4/22-4/23	
218	1999 Sutter (Marquette)	OH004-11	Demo/ Dispo	Planned	10/24	140 Units	Partial	10/22-10/23	CMHA does not plan to reduce its housing unit count
218	English Woods Land	OH004-04	Dispo	Planned	4/24	Land Only	Total	10/22-10/23	
	Laurel Homes	City West	Dispo	Amend approval	2/24	Land Only	Partial	4/22-4/27	
	Grandview	OH004-39	Dispo	Planned	10/24	Land Only	Partial	1/22-1/23	
	1813 Wyoming	OH004-40	Dispo	Approved	12/22	Building and Land	Partial	12/22-06/23	
	1237 Beech	OH004-40	Dispo	Approved	12/22	Building and Land	Partial	12/22-06/23	

	36 Ridge	OH004-45	Dispo	Approved	12/22	Building and Land	Partial	12/22-06/23	
	1636 Pasadena	OH004-45	Dispo	Approved	12/22	Building and Land	Partial	12/22-06/23	
	7 E. McMillian	OH004-40	Dispo	Submitted	12/22	Building and Land	Partial	01/23-06/24	
	4637 Ashtree		Dispo	Approved	12/22	Building and Land	Partial	12/22-6/23	
	1707 Vinton		Dispo	Planned	12/23	2 units	Partial	6/23-6/27	
	Beechwood		Dispo	Planned	6/23			1/23-6/24	

CMHA plans to submit a Section 18 Disposition Application for approximately 460 non-contiguous buildings with four or fewer total unit scattered sites (629 total units) under the guidelines of PIH Notice 2018-04 (HA) and any other applicable PIH Notices, rules and regulations. CMHA plans to transfer these units to a related entity and commit voucher resources received as a result of the disposition or otherwise to project-based vouchers for the units, thus creating a more stable funding source for these units. Approximately three of these units may need to be demolished and reconstructed. A 30-year use agreement will be tied to each unit restricting use of these properties to affordable housing. CMHA may request HUD permission to sell at fair market value a small portion of these units that are either in a deteriorated physical condition that will preclude their preservation as affordable housing or are remotely located making management and maintenance of these units financially infeasible. CMHA would seek additional tenant-based vouchers from HUD to replace those units. CMHA expects to phase in these unit dispositions over several years and will refine the timelines stated below.

Non-Contiguous 1-4 Unit Scattered Sites/Section 18 - Disposition Activity Description Table

	1	2	3	4	5
AMP	**Number of Units**	**Type**	**Status**	**Timeline (actual disposition)**	**Narrative**
201	111	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,
202	39	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,
203	45	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,
204	115	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,
205	82	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,
206	74	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,
207	138	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,
208	25	Dispo	Planned	2022-2024	CMHA plans to transfer the units to a related entity and commit voucher resources to project based vouchers for the units, with the exception noted above,

DESIGNATED HOUSING FOR ELDERLY AND/OR DISABLED FAMILIES

Asset Management
A designated housing plan has been developed for each of the developments below:

Development Name	Designation Type	Application Date	Approval Date	Number of units Affected
West Union Square	Elderly	02/21/17	03/20/17	19
Central YMCA	Elderly	02/21/17	03/20/17	15
Cary Crossing	Disabled			8
Riverview Apartments	Elderly	10/24/19	12/31/19	109
Redding Apartments	Elderly	10/24/19	12/31/19	99
President Apartments	Elderly	10/24/19	12/31/19	95

UNITS WITH APPROVED VACANCIES FOR MODERNIZATION

CMHA on a monthly basis submits for approval all units that are scheduled to receive substantial modernization. Only those units that receive approval are updated in PIC with the status of Modernization. The following table identifies the number of units by AMP with expected completion dates. As a planning tool it also identifies possible projects that may receive substantial modernization activities in the next fiscal year.

AMP	Project	Project Name	Unit Count	Status	Construction Completion Date
AMP 201	Various Addresses	Scattered Sites	20	Pending Submission	
AMP 202	Various Addresses	Scattered Sites	12	Pending Submission	
AMP 203	Various Addresses	Scattered Sites	10	Pending Submission	
AMP 204	Various Addresses	Scattered Sites	26	Pending Submission	
AMP 205	OH004-27	Quebec Gardens	40	Pending Submission	
AMP 205	Various Addresses	Scattered Sites	18	Pending Submission	
AMP 206	Various Addresses	Scattered Sites	10	Pending Submission	
AMP 207	Various Addresses	Scattered Sites	10	Pending Submission	
AMP 208	Various Address	Scattered Sites	12	Pending Submission	
AMP 208	OH004-29	Rion Lane	40	Pending Submission	
AMP 209	OH004-001	Winton Terrace	12	Pending Submission	
AMP 217	OH004-06	Millvale	14	Pending Submission	

B.3

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

CMHA Goals and Objectives:

Strategic Goals

1. Efficiency and Fiscal Responsibility: Develop a strong and profitable financial model and be good stewards of public funds.
2. Improve Processes and Performance: Manage an efficient and cost-effective internal operation.
3. Revive our Communities: Create and generate partnerships that promote healthy and stable neighborhoods in Hamilton County.
4. Quality Customer Service: Provide superior customer service and quality products.
5. Continued implementation of RAD.
6. Transform owned/operated portfolio through financially feasible funding models
7. Continue to use HUD tools to preserve affordable housing in Hamilton County
8. Use the Housing Strategy plan to help improve communities.
9. Use local and universal funding tools such as; American Rescue Plan, National Trust Fund, Cincinnati Foundation, Cincinnati Development Fund, City of Cincinnati, Hamilton County, Debt and Equity Funding, Issue CMHA Bonds to further preserve and build additional affordable housing
10. Apply for Choice Implementation Grant to improve the properties and lives of residents in and around the Choice Neighborhood (target area) and increase wealth building for all families, specifically increase black owned businesses and home ownership.
11. Utilizing CNI improve and implement neighborhood strategies
12. Preserve affordable housing units in the West End, specifically CMHA properties

13. Work towards diversifying income streams for CMHA
14. Increase opportunities of affordable homeownership

Annual Goals:

1. Maintain High Performer in HCV.
2. Continue to train staff on different funding models that deal with the transformation of our owned/operated portfolio.
3. Partner with Community Based Organizations and state agencies to collaborate on financial goals for our families.
4. Continue to update policies and SOP's.
5. Improve internal and external communications.
6. Continue to increase family income in the HCV Family Self-sufficiency Program.
7. Continue to recruit new property owners for the HCV Program.
8. Assess, renovate or modernize asset management units.
9. Expand portfolio to provide housing for special populations such as; multi-generational, work-force housing, veterans, individuals with disabilities and seniors, through development and project basing with partners.
10. Implement green and sustainable housing initiatives such as; net/near zero, enterprise green and LEED.
11. Continue to further fair housing throughout Hamilton County.
12. Continue to work towards improving resident's self-sufficiency through the EnVision centers
13. Increase broadband internet access throughout the agency for all residents
14. Review and update all lease agreements and house rules
15. Continue to preserve affordable housing throughout Hamilton County
16. Work toward strengthening relationships with the City of Cincinnati.
17. Work toward strengthening relationships with Hamilton County.
18. Strengthen partnerships with community groups
19. Continue to strengthen partnerships to preserve current housing and develop additional affordable housing throughout the community.
20. Complete a new agency Strategic Plan to use as a road map for the agency.
21. Increase resident owned business participation through our transformation plans
22. Increase MBE, WBE and Section 3 business participation
23. Develop criteria for preserving and developing current and new affordable housing
24. Work toward garnering business, through providing education and guidance to other small non-profit organizations and public housing authorities to preserve and build affordable housing.
25. Seek and utilize other sources of funding such as New Markets, Congressional EDI funding, etc.…

CMHA PROGRESS REPORT:

In 2022 CMHA accomplished the following:

1. Completed year three of the Strategic Plan goals.
2. Updated the ACOP
3. CMHA achieved high performer status under SEMAP for the Housing Choice Voucher Program in 2021
4. Completed transformation plan through Choice Neighborhoods Planning Grant
5. Continued successful engagement of Section 3, MBE, WBE goals
6. Closed on 9% Tax Credit development – Bennett Point
7. Awarded Co-Developer contract with Logan County Housing Authority
8. Closed on Two RAD Conversions
9. Completed Renovations on Two RAD Conversions
10. Utilized Historic Credits for the first time as funding source for renovation of public housing development through RAD program
11. Received the Largest Family Self Sufficiency Grant in the State of Ohio
12. Completed two??? Sherwin Williams Training Classes
13. Started Tools of the Trade job training program with partners
14. Distributed through our Book Enrichment Program over 10,000 Books
15. Updated our Procurement Policy
16. Updated our HCV Administrative Plan
17. Updated agency wide Standard Operating Procedures
18. Updated our Human Resources Policy
19. Updated and implemented changes associated to Risk Management that covers all programs
20. Updated and enhanced cyber security platforms and reestablished cyber insurance
21. Hired a record number of MBE, WBE and Section 3 companies to complete day-to-day maintenance of operations, preserve, and develop affordable housing in Cincinnati and Hamilton County

B.4 **Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

See HUD EPIC 50075.2 approved by HUD 8/05/22 CFP Five Year Action Plan 2022-2026 Rev.1.

B.5 **Most Recent Fiscal Year Audit**.

(a) Were there any findings in the most recent FY Audit?

Y N
☒ ☐

(b) If yes, please describe:

This statement is based on the results of the FY 2021 financial audit. The FY2022 financial audit has not been completed at this time.

C. Other Document and/or Certification Requirements.

C.1 **Resident Advisory Board (RAB) Comments.**

The Cincinnati Metropolitan Housing Authority made it possible for every resident have the opportunity to engage in a program to gain their input for the FY2023-2024 Annual Plan. There were several opportunities for all residents to attend meetings at their property locations to participate in conversation regarding the Capital Statement, Admissions and Continued Occupancy Policy (ACOP) and the CMHA Lease Agreement changes/revisions for the new year. Transportation was provided to meeting location if requested by the residents. At the meeting residents were given the opportunity to discuss their ideas/concerns with the CMHA staff.

CMHA Property Management was on site to assist with any concerns regarding maintenance and work orders.

A total of 75 residents attended the meetings:

The following is a summary of topics of concern as presented by the residents in the Annual Plan Outreach.

1. Maintenance Charges – how and when does a resident obtain charges for maintenance repair
2. Notification process for entry into a resident unit or building. Can we have them use a "Door Tag". Must have ID or resident can report them to CMHA.
3. Parking – Can the vehicle use in parking lot be one vehicle per resident.
4. Work Orders - Change to allow residents to call in work orders for other residents.
5. Rental payment – Can residents pay their rent by phone.
6. Rental Payment – When will the automated rent line be available.
7. Timeliness of issuing rental statements
8. Pet policy enforced – Pets are being permitted in common area and are defecating in building and areas outside of units. Unprofessional demeanor of management staff. Management presence and response to be available more frequently.
9. Recertification - Process is ineffective and residents are not receiving updated rental documents timely. The delay of information is causing residents to owe back rental money to CMHA

Meetings were held at 11 different locations between December 22nd and January 5th.

See below for invitation postcard that was mailed directly to each resident.

CMHA Annual Plan
Beechwood
Resident Participation Event
CMHA invites residents to come to a resident participation event to give feedback to staff members on what you would like to see changed in the Annual Plan for FY2023-2024.
Beechwood
330 Forest Ave
Cincinnati, Ohio 45229
Thursday December 22, 2022
5:00pm to 6:00pm
Beechwood Meeting Room
FOR MORE INFORMATION
CALL: (513) 977-5847
CMHA

Unable to attend the meeting in your community?

Here is a list of all meeting locations. You are welcome to attend any meeting location you would like.

We want to hear from you.

Date	Location	Address	Time
Thursday December 22, 2022	San Marco Meeting Room	1601 Madison Rd	3:00pm -4:00pm
Thursday December 22, 2022	Beechwood Meeting Room	330 Forest Ave	5:00pm-6:00pm
Tuesday December 27, 2022	Maple Tower Meeting Room	601 Maple Ave	11:00am - Noon
Tuesday December 27, 2022	Findlater Gardens Envision Center	595 Strand	3:00pm - 4:00pm
Wednesday December 28, 2022	Riverview Meeting Room	2538 Hackberry	11:00am - Noon
Wednesday December 28, 2022	Millvale Management Office Conference Room	3357 Beekman	3:00pm -4:00pm
Thursday December 29, 2022	Redding Meeting Room	3700 Reading Rd	11:00am -Noon
Thursday December 29, 2022	Winton Terrace Envision Center	4848 Winneste	3:00pm – 4:00pm
Friday December 30, 2022	President Meeting Room	784 Greenwood	1:00pm- 2:00pm
Friday December 30, 2022	Stanley Rowe Meeting Room	1621 Linn St	4:00pm – 5:00pm
Thursday January 5, 2023	Cincinnati Metropolitan Housing Authority Auditorium ***	1635 Western Ave	5:30pm - 7:00pm

*** **Transportation is available. Please call 513.977.5847 no later than Noon January 3, 2023.**

ANNUAL PLAN COMMENTS FOR FY2023-2024
SUMMARY OF COMMENT TO PLAN
AND CMHA RESPONSE

CMHA provides the following written comments regarding the Annual Plan, the proposed changes to the Plan and the related documents. The following is a summary of the comments and CMHA's response to the comment(s). Similar comments have been paraphrased and grouped together with CMHA's response. The text of all comments is included as an attachment to this summary.

SUMMARY

Thank you for your response and review of the Annual Plan and interest in CMHA. CMHA considers that we have a shared vision for expanding the affordable housing footprint in Hamilton County through our voucher and asset management programs.

COMMENT PERIOD RUNS FROM 01/24/23 -03/10/23
THIS SECTIOIN WILL BE UPDATED AFTER THE COMMENT PERIOD ENDS

C.2 **Certification by State or Local Officials.**

Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

This section is being reviewed by State and Local Officials

C.3 **Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.**

Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

This section is being reviewed

C.4 **Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

(a) Did the public challenge any elements of the Plan?

Y	N
☐	☒

If yes, include Challenged Elements.

C.5 **Troubled PHA.**
(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Y	N	N/A
☐	☐	☒

(b) If yes, please describe:

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Improve Outreach and Marketing Materials: CMHA will conduct outreach as needed to maintain an adequate application pool representative of the eligible population in the area. Outreach efforts will consider the level of vacancy in CMHA's units, availability of units through turnover, and waiting list characteristics. CMHA will periodically assess these factors in order to determine the need for and scope of any marketing efforts. All marketing efforts will include outreach to those least likely to apply.

Marketing and informational materials will be subject to the following:

a. Marketing materials will comply with Fair Housing Act requirements on wording, logo, size of type, etc.;

b. Marketing will describe the housing units, application process, waiting list and preference structure accurately;

c. Marketing will use clear and easy to understand terms and will use more than strictly English-language print media;

d. Agencies that serve and advocate for potentially qualified applicants least likely to apply (e.g. the disabled) will be contacted to ensure that accessible/adaptable units are offered to applicants who need these features;

e. Marketing materials will make clear who is eligible: low income individuals and families; working and non-working people; and people with both physical and mental disabilities; and

f. CMHA will be clear about its responsibility to provide reasonable accommodations to people with disabilities.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

AFFIRMATIVELY FURTHERING FAIR HOUSING

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. CMHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Programs on the basis of race, color, sex, religion, creed, national or ethnic origin, age, to actual or perceived sexual orientation, gender identity, familial or marital status, handicap or disability.

To further its commitment to full compliance with applicable Civil Rights laws, CMHA will provide Federal/State/local information to Voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Voucher holder's briefing packet and available upon request at the HCV reception desk.

All Housing Authority staff is kept informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families.

Affirmatively furthering fair housing includes providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Fair Housing posters are posted throughout the Housing Authority offices, including in the lobby and interview rooms and the equal opportunity logo is used on all outreach materials. Staff will attend local fair housing update training sponsored by HUD and other local organizations to keep current with new developments.

Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because CMHA's facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout CMHA's office in such a manner as to be easily readable from a wheelchair.

CMHA offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided by Cincinnati Bell by dialing 1-800-545-1833.

CMHA will take the following steps to ensure that the FSS program "Affirmatively Furthers Fair Housing:"

Advertise widely in the community for the coordinator position or positions by publicizing and disseminating information to make known the availability of the FSS Coordinator position. CMHA will advertise in a newspaper of general circulation, minority media, and by other suitable means.

Market the program to all eligible persons, including persons with disabilities and persons with limited English proficiency by:

Providing all annual recertification HCV participants with information about the HCV FSS program (description of the program and FSS Coordinator contact information).

For persons with limited English proficiency (LEP) the following will be considered:

Oral Translation

The Housing Authority, with sufficient advanced notice, will make arrangements to assist non-English speaking families and translate documents into other languages.

Translation of Documents

In determining whether it is feasible to provide translation of documents written in English into other languages, CMHA will consider the following factors:

The number of applicants and participants in the jurisdiction who do not speak English and speak the other language.

The estimated cost to CMHA per client of translation of English written documents into the other language.

The availability of local organizations to provide translation services to non-English speaking families.

The availability of bilingual staff to provide translation for non-English speaking families.

Make buildings and communications that facilitate applications and service delivery accessible to persons with disabilities:

Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because CMHA's facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout CMHA's office in such a manner as to be easily readable from a wheelchair.

CMHA offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided by Cincinnati Bell by dialing 1-800- 545-1833.

Provide fair housing counseling services or referrals to fair housing agencies to families needing this service.

Inform participants of how to file a fair housing complaint, and provide them with the toll-free number of the Housing Discrimination Hotline: 1-800- 669-9777

To further its commitment to full compliance with applicable Civil Rights laws, CMHA will provide Federal/State/local information to Voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session, during annual recertification on FSS information forms, on all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Voucher holder's briefing packet and available upon request at the HCV reception desk.

If the program has a goal of homeownership or housing mobility, recruiting landlords and service providers in areas that expand housing choice to program participants. Record keeping covers, but is not limited to, the race, ethnicity, familial status, and disability status of program participants by:

Listed below are normal outreach activities used to facilitate an understanding of CMHA's Housing Choice Voucher program by other entities in Hamilton County:

CMHA makes a concerted effort to keep private owners informed of legislative changes in the tenant-based program, which are designed to make the program more attractive to owners. This includes informing participant owners of applicable legislative changes in program requirements.

CMHA encourages owners of decent, safe and sanitary housing units to lease to Housing Choice Voucher Program families.

CMHA encourages participation by owners of suitable units located outside areas of high poverty or minority concentration.

CMHA conducts general meetings with participating owners to improve owner relations, increase program knowledge and recruit new owners.

CMHA maintains a list of interested owners and lists of units available for the Housing Choice Voucher Program and updates this list at least monthly. When listing requests from owners are received, they will be compiled by CMHA staff by bedroom size. CMHA reserves the right to pre-screen the property before listing it.

CMHA maintains lists of available housing submitted by owners in all neighborhoods within the Housing Authority's jurisdiction to ensure greater mobility and housing choice to very low-income households. The lists of owners/units will be provided in the lobby, mailed on request, maintained on the agency's Internet site and provided at briefings. CMHA is not responsible for the accuracy of the information on the available unit listing.

The staff of CMHA initiates personal contact with private property owners and managers by conducting formal and informal discussions and meetings.

Printed material is offered to acquaint owners and managers with the opportunities available under the program.

CMHA actively participates in a community-based organization(s) comprised of private property and apartment owners and managers.

CMHA actively recruits property owners with property located outside areas of minority and poverty concentration and apply for exception payment standards if CMHA determines it is necessary to make the program more accessible in CMHA's jurisdiction.

CMHA encourages program participation by owners of units located outside areas of poverty or minority concentration. CMHA periodically evaluates the demographic distribution of assisted families to identify areas within the jurisdiction where owner outreach should be targeted. The purpose of these activities is to provide more choice and better housing opportunities to families.

Voucher holders are informed of a broad range of areas where they may lease units inside CMHA's jurisdiction and are given a list of owners or other parties who are willing to lease units or help families who desire to live outside areas of poverty or minority concentration.

CMHA may work with an outside entity to counsel families on their prospective move and services available in the areas in which the family is interested, with the goal of increasing the number of voucher holders moving into low-poverty neighborhoods.

CMHA shall periodically:

- **Request the HUD Field Office to furnish a list of HUD-held properties available for rent.**
- **Develop working relationships with owners' associations including Greater Cincinnati Northern Kentucky Apartment Association and Real Estate Investors Association.**
- **Establish contact with civic, charitable and neighborhood organizations which have an interest in housing for low-income families and public agencies concerned with obtaining housing for displacements.**
- **Explain the program, including equal opportunity requirements and nondiscrimination requirements, including Fair Housing Amendments Act of 1988 and Americans with Disabilities Act, to real estate agents, owners, and other groups that have dealings with low-income families or are interested in housing such families.**

CMHA works with HUD-Approved Homeownership Counseling agencies that promote CMHACMHA Homeownership program to the community as well. These agencies' training curriculum emphasizes (but not limited to):

How to find a home, including information about home ownership opportunities, schools, and transportation in the CMHA jurisdiction;

Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;

How to negotiate the purchase price of a home

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal