

# PHA Plans

5 Year Plan for Fiscal Years 2000 - 2004

(CMHA Fiscal Years 2001 - 2005)

Annual Plan for Fiscal Year 2000

(CMHA Fiscal Year 2001)

## **FINAL VERSION**

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN ACCORDANCE  
WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**

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## **PHA Plan Agency Identification**

**PHA Name:** Cincinnati Metropolitan Housing Authority

**PHA Number:** OH - 004

**PHA Fiscal Year Beginning:** (mm/yyyy) 07/2000

### **Public Access to Information**

**Information regarding any activities outlined in this plan can be obtained by contacting: (select all that apply)**

- ☒ Main administrative office of the PHA
  - ☒ PHA development management offices
  - ☒ PHA local offices
- 1635 Western Avenue, Cincinnati, OH 45214

### **Display Locations for PHA Plans and Supporting Documents**

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- ☒ Main administrative office of the PHA  
16 West Central Parkway, Cincinnati, OH 45210
- ☐ PHA development management offices
- ☐ PHA local offices
- ☐ Main administrative office of the local government
- ☐ Main administrative office of the County government
- ☐ Main administrative office of the State government
- ☐ Public library
- ☐ PHA website
- ☐ Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- ☒ Main business office of the PHA  
16 West Central Parkway, Cincinnati, OH 45210
- ☒ PHA development management offices  
The Admissions and Continued Occupancy Policy and Public Housing Lease are available for review at the following development management offices:

**Beechwood**, 330 Forest Avenue, Cincinnati, OH 45229  
**English Woods**, 1990 Sutter Avenue, Cincinnati, OH 45225  
**Marquette Manor**, 1999 Sutter Avenue, Cincinnati, OH 45225  
**Evanston**, 1820 Rutland Avenue, Cincinnati, OH 45207  
**Findlater Gardens**, 595 Strand Lane, Cincinnati, OH 45232  
**Laurel Homes**, 571 Derrick Turnbow, Cincinnati, OH 45214  
**Lincoln Court**, 529-B Ezzard Charles, Cincinnati, OH 45203  
**Maple Tower**, 601 Maple Avenue, Cincinnati, OH 45229  
**Millvale**, 3357 Beekman Street, Cincinnati, OH 45223  
**Park Eden**, 2610 Park Avenue, Cincinnati, OH 45206  
**Pinecrest**, 3951 West 8th Street, Cincinnati, OH 45205  
**President**, 784 Greenwood, Cincinnati, OH 45229  
**Redding**, 3700 Reading Road, Cincinnati, OH 45229  
**Riverview House**, 2538 Hackberry Street, Cincinnati, OH 45206  
**San Marco**, 1601 Madison Road, Cincinnati, OH 45206  
**Stanley Rowe**, 1609 Linn Street, Cincinnati, OH 45214  
**Winton Terrace**, 4848 Winneste Avenue, Cincinnati, OH 45232  
☒ Other (list below)  
The Section 8 Administrative Plan is also available at:  
**Section 8 Department**, 1635 Western Avenue, Cincinnati, OH 45214



**5-YEAR PLAN**  
**PHA FISCAL YEARS 2000 - 2004**

[24 CFR Part 903.5]

**A. Mission**

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- ☐ The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- ☒ The PHA's mission is: (state mission here)  
CMHA will provide a quality, affordable living environment that recognizes our diverse socioeconomic population through responsible collaboration with the greater Hamilton County Community.

**B. Goals**

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

**HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.**

- ☒ PHA Goal: Expand the supply of assisted housing  
Objectives:
- ☒ Apply for additional rental vouchers: **Offered from relocation foreclosures and owner opt out of the contract.**
  - ☒ Reduce public housing vacancies:
  - ☒ Leverage private or other public funds to create additional housing opportunities:  
CMHA is targeting the Grandview site for a small scale mixed-finance and mixed-income development. CMHA will also explore other opportunities for development.
  - ☒ Acquire or build units or developments
  - ☐ Other (list below)

- ☒ PHA Goal: Improve the quality of assisted housing
  - Objectives:
    - ☒ Improve public housing management: (PHAS score)  
Each year, CMHA will aim to obtain high-performer designation under the PHAS rating system.
    - ☒ Improve voucher management: (SEMAP score)  
Each year, CMHA will aim to obtain high-performer designation under the SEMAP rating system.
    - ☒ Increase customer satisfaction:
    - ☒ Concentrate on efforts to improve specific management functions:  
(list; e.g., public housing finance; voucher unit inspections)
    - ☒ Renovate or modernize public housing units:
    - ☒ Demolish or dispose of obsolete public housing:
    - ☒ Provide replacement public housing:
    - ☒ Provide replacement vouchers:  
CMHA intends to apply for housing replacement factor funds for 144 units at the Grandview (OH 04-39, OH 04-40), 4 units at Quebec (04-29), and 3 units at Winton Ridge Lane (OH 04-43).
    - ☒ Other: (list below)  
The Lincoln Court and Laurel Homes HOPE VI developments will be privately managed upon completion of the redevelopment.
- ☒ PHA Goal: Increase assisted housing choices
  - Objectives:
    - ☒ Provide voucher mobility counseling: **ROC Program**
    - ☒ Conduct outreach efforts to potential voucher landlords: **Owners Assoc. Meetings / Better Housing League/ Greater Cinti/KY APT Owner Assoc.**
    - ☒ Increase voucher payment standards **equal to FMR**
    - ☒ Implement voucher homeownership program: **Housing Choice (FSS)**
    - ☒ Implement public housing or other homeownership programs:
    - ☒ Implement public housing site-based waiting lists:
    - ☐ Convert public housing to vouchers:
    - ☐ Other: (list below)

### **HUD Strategic Goal: Improve community quality of life and economic vitality**

- ☒ PHA Goal: Provide an improved living environment
  - Objectives:
    - ☒ Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:

- ☒ Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
- ☒ Implement public housing security improvements:
- ☒ Designate developments or buildings for particular resident groups (elderly, persons with disabilities)  
CMHA currently has 12 buildings designated for the seniors and disabled. Some of these buildings may be designated for seniors only. The remaining buildings will continue to be senior/disabled buildings. In the first year of the plan, CMHA may designate Park Eden for seniors only. In the second year, CMHA may designate Maple Tower. During the five year planning period CMHA may also consider designating another building for seniors only, along with a new 54-unit building to be constructed at Lincoln Court.
- ☐ Other: (list below)

**HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals**

- ☒ PHA Goal: Promote self-sufficiency and asset development of assisted households  
Objectives:
  - ☒ Increase the number and percentage of employed persons in assisted families:
  - ☒ Provide or attract supportive services to improve assistance recipients' employability:
  - ☒ Provide or attract supportive services to increase independence for the elderly or families with disabilities.
  - ☐ Other: (list below)

**HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans**

- ☒ PHA Goal: Ensure equal opportunity and affirmatively further fair housing  
Objectives:
  - ☒ Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
  - ☒ Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
  - ☒ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
  - ☐ Other: (list below)

**Other PHA Goals and Objectives: (list below)**

**Annual PHA Plan**  
**PHA Fiscal Year 2000**

[24 CFR Part 903.7]

**i. Annual Plan Type:**

Select which type of Annual Plan the PHA will submit.

☐ **Standard Plan**

**Streamlined Plan:**

- ☒ **High Performing PHA**
- ☐ **Small Agency (<250 Public Housing Units)**
- ☐ **Administering Section 8 Only**

☐ **Troubled Agency Plan**

**ii. Executive Summary of the Annual PHA Plan**

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

The Cincinnati Metropolitan Housing Authority (CMHA) hopes to expand on recent success during fiscal year 2001 (HUD FY 2000). The agency has developed networks with people and organizations across Hamilton County to meet its mission of providing safe, decent, and affordable housing. CMHA will strive to maintain its position as a leader in the affordable housing industry by maintaining a rating as a high performing public housing agency. CMHA will administer a variety of programs to enhance the quality of housing and promote resident self-sufficiency, independence, and safety. CMHA will be implementing a variety of mandated and discretionary policies during fiscal year 2001.

As a result of federal law, residents between the ages of 18 and 61 who are unemployed will be required to participate in community service activities for eight (8) hours per month. However, the disabled and those participating in self-sufficiency programs (including those who are meeting the requirements of the Ohio Works First Program) are not required to perform community service. CMHA is also exempting full-time students from the community service requirement, as they are considered to be participating in a self-sufficiency program. Residents in most developments will have an opportunity to have a household pet as established in federal guidelines. However, this is subject to regulation, such as local ordinances established by the City of Cincinnati or other jurisdictions in the area.

For purposes of calculating rent, CMHA will disregard, for twelve months, the earned income of family members who were unemployed for a year or more and become employed;



family members whose employment income increases as a result of participation in a self-sufficiency or job training program; or family members who were receiving welfare benefits in the last six months and whose earned income increases. During the following twelve months, the family's rent may be increased by 50% of the amount that would have been in effect without the disregard

CMHA is required to take actions to ensure that low-income families are not concentrated in one particular development or another. CMHA will also comply with federal guidelines that dictate that 40% of new admissions must be at or under 30% of the area median income each year.

CMHA providing new opportunities to residents and applicants. CMHA will give new applicants the option of selecting a specific community they desire to live in. Waiting lists will be administered for specific sites. CMHA will give residents who have a history of good housekeeping and are free of lease violations the opportunity to transfer to certain scattered site housing units. CMHA is also reviewing the possibility of making Park Eden a seniors only community during fiscal year 2001.

CMHA currently has an optional income disregard program in which 20% of earned income above \$10,500 is disregarded for purposes of calculating rent (40% at Lincoln, Laurel, English Woods, and Findlater Gardens). CMHA will drop the \$10,500 baseline and the 40% for Lincoln, Laurel, English Woods, and Findlater Gardens. As a result, CMHA's new optional earned income disregard will exclude 20% of all income from employment for purposes of calculating rent at all developments.

CMHA will implement services and programs for residents to lessen crime and substance abuse and promote self-sufficiency. Drug Elimination Grant funding will support expanded security and law enforcement, job preparedness and retention, and academic and enrichment endeavors. Each effort will have clearly defined objectives that promote economic and educational development for CMHA residents.

CMHA will use funding to comprehensively modernize units at several developments, including family and senior communities. Many of these initiatives were outlined in the Comprehensive Grant Updated Five-Year Action Plan. HOPE VI funds are already in place to rebuild the Laurel Homes and Lincoln Court communities. English Woods is being examined as a potential HOPE VI redevelopment effort. The vacant Grandview site in Price Hill is being targeted as a smaller scale mixed-income and mixed-financed redevelopment, with approximately 50 units of market rate and affordable housing.

### **iii. Annual Plan Table of Contents**

[24 CFR Part 903.7 9 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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#### **Attachments**

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- ☒ (File OH004a02) Admissions Policy for Deconcentration: Attachment C  
(Included in Admissions and Continued Occupancy Policy)
- ☒ FY 2000 Capital Fund Program Annual Statement: Attachment A

- ☐ Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- ☐ PHA Management Organizational Chart
- ☐ FY 2000 Capital Fund Program 5 Year Action Plan
- ☒ (File OH004a01) Public Housing Drug Elimination Program (PHDEP) Plan:  
Attachment B
- ☒ Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)  
***Comments from the Resident Advisory Board are included in Section 18 of the Annual Plan.***
- ☐ Other (List below, providing each attachment name)

**Supporting Documents Available for Review**

Indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
✓	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
✓	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
✓	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
✓	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
✓	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
✓	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
✓	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
✓	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
✓	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
✓	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
✓	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
✓	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
✓	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
✓	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
✓	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
✓	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
✓	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
✓	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
✓	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
✓	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
✓	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
✓	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
✓	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
✓	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
✓	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
✓	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

## **1. Statement of Housing Needs**

[24 CFR Part 903.7 9 (a)]

### **A. Housing Needs of Families in the Jurisdiction/s Served by the PHA**

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." Use N/A to indicate that no information is available upon which the PHA can make this assessment.

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
<b>Family Type</b>	<b>Overall</b>	<b>Afford- ability</b>	<b>Supply</b>	<b>Quality</b>	<b>Access- ibility</b>	<b>Size</b>	<b>Loca- tion</b>
Income <= 30% of AMI	32,331	5	5	2	5	4	5
Income >30% but <=50% of AMI	15,506	5	5	2	5	4	5
Income >50% but <80% of AMI	18,110	5	5	2	5	4	5
Elderly	18,574	5	5	2	5	4	5
Families with Disabilities	25,182	5	5	2	5	4	5
Race/Black (<=80AMI)	32,318	5	5	2	5	4	5
Race/White (<=80AMI)	32,134	5	3	2	3	3	1
Race/Asian P.I. (<=80AMI)	432	5	5	2	5	4	5
Race/Am. Indian (<=80AMI)	219	5	5	2	5	4	5
Hispanic (<=80AMI)	427	5	5	2	5	4	5

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- ☒ Consolidated Plan of the Jurisdiction/s  
Indicate year: 2000
- ☒ U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset

- ☐ American Housing Survey data  
Indicate year:
- ☐ Other housing market study  
Indicate year:
- ☐ Other sources: (list and indicate year of information)

## B. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

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)			
<input type="checkbox"/>	Section 8 tenant-based assistance		
<input checked="" type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	799		2568
Extremely low income <=30% AMI	574	71.84%	
Very low income (>30% but <=50% AMI)	183	22.90%	
Low income (>50% but <80% AMI)	38	4.76%	
Families with children	350	43.80%	
Elderly families	43	5.38%	
Families with Disabilities	131	16.40%	
Race/ethnicity: White	90	11.26%	
Race/ethnicity: African-American	707	88.49%	
Race/ethnicity: Native-American	0	0%	
Race/ethnicity: Asian-American	2	.25%	

Housing Needs of Families on the Waiting List			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	444	55.57%	987
2 BR	222	27.78%	865
3 BR	109	13.64%	539
4 BR	25	3.13%	153
5 BR	2	.25%	19
5+ BR	0	0%	5
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	1,200		1,945
Extremely low income <=30% AMI	949	79.08%	



Housing Needs of Families on the Waiting List			
Very low income (>30% but <=50% AMI)	227	18.92%	
Low income (>50% but <80% AMI)	24	2.00%	
Families with children	843	70.25%	
Elderly families	75	6.25%	
Families with Disabilities	187	15.58%	
Race/ethnicity: White	131	10.92%	
Race/ethnicity: African-American	1,065	88.75%	
Race/ethnicity: Native American	3	.25%	
Race/ethnicity: Asian-American	1	.08%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	327	27.25%	548
2 BR	499	41.58%	661
3 BR	301	25.08%	579
4 BR	66	5.50%	136
5 BR	7	.58%	16
5+ BR	0	0.00%	5
<p>Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p> <p>If yes:</p> <p>How long has it been closed (# of months)? 1</p> <p>Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p> <p>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>			

### C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

#### **(1) Strategies**

**Need: Shortage of affordable housing for all eligible populations**

#### **Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- ☒ Employ effective maintenance and management policies to minimize the number of public housing units off-line
- ☒ Reduce turnover time for vacated public housing units
- ☒ Reduce time to renovate public housing units
- ☒ Seek replacement of public housing units lost to the inventory through mixed finance development
- ☒ Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- ☒ Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- ☒ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- ☒ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- ☒ Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- ☒ Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- ☐ Other (list below)

#### **Strategy 2: Increase the number of affordable housing units by:**

Select all that apply

- ☒ Apply for additional section 8 units should they become available
- ☒ Leverage affordable housing resources in the community through the creation of mixed - finance housing
- ☒ Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- ☐ Other: (list below)

**Need: Specific Family Types: Families at or below 30% of median**

**Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- ☐ Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- ☒ Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- ☐ Employ admissions preferences aimed at families with economic hardships
- ☒ Adopt rent policies to support and encourage work
- ☐ Other: (list below)

**Need: Specific Family Types: Families at or below 50% of median**

**Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- ☒ Employ admissions preferences aimed at families who are working
- ☒ Adopt rent policies to support and encourage work
- ☐ Other: (list below)

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- ☒ Seek designation of public housing for the elderly
- ☐ Apply for special-purpose vouchers targeted to the elderly, should they become available
- ☐ Other: (list below)

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

- ☐ Seek designation of public housing for families with disabilities
- ☒ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- ☐ Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- ☐ Affirmatively market to local non-profit agencies that assist families with disabilities
- ☐ Other: (list below)

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- ☒ Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- ☐ Other: (list below)

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

- ☒ Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- ☒ Market the section 8 program to owners outside of areas of poverty /minority concentrations
- ☐ Other: (list below)

**Other Housing Needs & Strategies: (list needs and strategies below)**

**(2) Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- ☒ Funding constraints
- ☒ Staffing constraints
- ☐ Limited availability of sites for assisted housing
- ☐ Extent to which particular housing needs are met by other organizations in the community
- ☒ Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- ☒ Influence of the housing market on PHA programs
- ☒ Community priorities regarding housing assistance

- ☒ Results of consultation with local or state government  
☒ Results of consultation with residents and the Resident Advisory Board  
☐ Results of consultation with advocacy groups  
☒ Other: (list below)  
 Community planning sessions with resident council officers and members of various public and community agencies.

## **2. Statement of Financial Resources**

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2000 grants)</b>		
a) Public Housing Operating Fund	\$19,853,000	
b) Public Housing Capital Fund	\$19,672,000	
c) HOPE VI Revitalization	\$4,193,000	
d) HOPE VI Demolition	\$0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$23,081,000	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	\$1,581,000	
g) Resident Opportunity and Self-sufficiency Grants	\$0	
h) Community Development Block Grant	\$0	N/A
i) HOME	\$0	N/A
<b>Other Federal Grants (list below)</b>		
a) Regional Opportunity Counseling	\$248,000	Section 8 Tenant Based Assistance
b) Family Self Sufficiency	\$46,000	Section 8 Supportive Services

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
a) Public Housing Capital Fund	\$4,352,000	Public Housing Capital Improvements
b) Elderly Services	\$75,000	Public Housing Supportive Services
c) Congregate Housing Services Program	\$111,000	Public Housing Supportive Services
d) Public Housing Drug Elimination Program (including any Technical Assistance funds)	\$2,228,000	Public Housing Safety and Security
<b>3. Public Housing Dwelling Rental Income</b>		
a) Rental Income	\$14,151,000	Public Housing Operations
<b>4. Other income (list below)</b>		
a) Excess Utilities	\$109,000	Public Housing Operations
b) Nondwelling Rental	\$22,000	Other
c) Interest & Other Income	\$817,000	Other
<b>4. Non-federal sources (list below)</b>		
<b>Total resources</b>	<b>\$90,539,000</b>	

### **3. PHA Policies Governing Eligibility, Selection, and Admissions**

[24 CFR Part 903.7 9 (c)]

#### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

##### **(1) Eligibility**

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- ☐ When families are within a certain number of being offered a unit: (state number)
- ☐ When families are within a certain time of being offered a unit: (state time)
- ☒ Other: (describe)

As soon as possible after the filing of application.

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- ☒ Criminal or Drug-related activity
- ☒ Rental history
- ☒ Housekeeping
- ☐ Other (describe)

c. ☒ Yes ☐ No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

d. ☒ Yes ☐ No: Does the PHA request criminal records from State law enforcement agencies for screening purposes? When necessary.

e. ☒ Yes ☐ No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) When necessary.

##### **(2)Waiting List Organization**

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- ☐ Community-wide list
- ☐ Sub-jurisdictional lists
- ☒ Site-based waiting lists
- ☐ Other (describe)

b. Where may interested persons apply for admission to public housing?

- ☐ PHA main administrative office
- ☐ PHA development site management office

☒ Other (list below)

CMHA Crosley Commons II, 1635 Western Avenue, Cincinnati, OH 45214

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year? 10

2. ☒ Yes ☐ No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?  
If yes, how many lists? 10

3. ☒ Yes ☐ No: May families be on more than one list simultaneously  
If yes, how many lists? 3

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- ☐ PHA main administrative office
- ☐ All PHA development management offices
- ☐ Management offices at developments with site-based waiting lists
- ☐ At the development to which they would like to apply
- ☒ Other (list below): CMHA Leasing Department  
1635 Western Avenue, Cincinnati, OH 45214

### **(3) Assignment**

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- ☒ One
- ☐ Two
- ☐ Three or More

b. ☒ Yes ☐ No: Is this policy consistent across all waiting list types?

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

### **(4) Admissions Preferences**



a. Income targeting:

- ☒ Yes ☐ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- ☒ Emergencies  
☒ Overhoused  
☒ Underhoused  
☒ Medical justification  
☒ Administrative reasons determined by the PHA (e.g., to permit modernization work)  
☐ Resident choice: (state circumstances below)  
☒ Other: (list below)  
1. CMHA will implement an incentive transfer program whereby residents have non-scattered site residents have an opportunity to transfer to a scattered site. 3 incentive transfers will be processed for each new admission to the affected scattered site units.  
2. If a family is overhoused or underhoused but not outside the minimum or maximum occupancy standards for the unit, then the transfer will be processed at a rate of 1 transfer for every 4 new admissions.  
3. A transfer to avoid concentrations of the most economically and socially deprived residents will be processed at a rate of 1 transfer for every 4 new admissions.

c. Preferences

1. ☒ Yes ☐ No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If "no" is selected, skip to subsection **(5) Occupancy**)
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)  
☐ Victims of domestic violence  
☐ Substandard housing  
☐ Homelessness  
☐ High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- ☒ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans' families
- ☐ Residents who live and/or work in the jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☒ Households that contribute to meeting income goals (broad range of incomes)
- ☒ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

2 Working Family

3 Date and Time

1 Income Tier

Former Federal preferences:

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- ☐ Victims of domestic violence
- ☐ Substandard housing
- ☐ Homelessness
- ☐ High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- ☒ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans' families
- ☐ Residents who live and/or work in the jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☒ Households that contribute to meeting income goals (broad range of incomes)
- ☒ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

4. Relationship of preferences to income targeting requirements:

- ☐ The PHA applies preferences within income tiers
- ☒ Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Occupancy**

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- ☒ The PHA-resident lease
- ☒ The PHA's Admissions and (Continued) Occupancy policy
- ☒ PHA briefing seminars or written materials
- ☐ Other source (list)

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- ☒ At an annual reexamination and lease renewal
- ☒ Any time family composition changes
- ☐ At family request for revision
- ☐ Other (list)

**(6) Deconcentration and Income Mixing**

- a. ☐ Yes ☒ No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

- b. ☐ Yes ☒ No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

- ☐ Adoption of site-based waiting lists
- If selected, list targeted developments below:
- ☐ Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments

If selected, list targeted developments below:

- ☐ Employing new admission preferences at targeted developments

If selected, list targeted developments below:

- ☐ Other (list policies and developments targeted below)

- d. ☒ Yes ☐ No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

- e. If the answer to d was yes, how would you describe these changes? (select all that apply)

- ☒ Additional affirmative marketing  
☒ Actions to improve the marketability of certain developments  
☐ Adoption or adjustment of ceiling rents for certain developments  
☒ Adoption of rent incentives to encourage deconcentration of poverty and income-mixing  
☐ Other (list below)

- f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

- ☐ Not applicable: results of analysis did not indicate a need for such efforts  
☒ List (any applicable) developments below:  
English Woods (OH 4-02, OH 4-14)  
Findlater Gardens (OH 4-10, OH 4-13)  
Laurel Homes (OH 4-03, OH 4-08)  
Lincoln Court (OH 4-04)  
Millvale (OH 4-05, OH 4-06)  
Winton Terrace (OH 4-01)

- g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

- ☒ Not applicable: results of analysis did not indicate a need for such efforts  
☐ List (any applicable) developments below:

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).

**(1) Eligibility**

- a. What is the extent of screening conducted by the PHA? (select all that apply)
- ☐ Criminal or drug-related activity only to the extent required by law or regulation
- ☒ Criminal and drug-related activity, more extensively than required by law or regulation
- ☐ More general screening than criminal and drug-related activity (list factors below)
- ☐ Other (list below)
- b. ☒ Yes ☐ No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- c. ☒ Yes ☐ No: Does the PHA request criminal records from State law enforcement agencies for screening purposes? (When necessary)
- d. ☒ Yes ☐ No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source) (When necessary)
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- ☒ Criminal or drug-related activity
- ☒ Other (describe below) Upon Request by Landlord as describe in conforming rule #3

**(2) Waiting List Organization**

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- ☐ None
- ☐ Federal public housing
- ☒ Federal moderate rehabilitation
- ☒ Federal project-based certificate program
- ☒ Other federal or local program (list below) Waiting list process using pre-application cards.
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- ☐ PHA main administrative office  
☒ Other (list below)  
Section 8 Department, 1635 Western Avenue, Cincinnati, OH 45214

**(3) Search Time**

- a. ☒ Yes ☐ No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below: As Requested by applicant

**(4) Admissions Preferences**

- a. Income targeting

- ☒ Yes ☐ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

- b. Preferences

1. ☒ Yes ☐ No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)  
☐ Victims of domestic violence  
☐ Substandard housing  
☐ Homelessness  
☐ High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability  
☐ Veterans and veterans' families  
☐ Residents who live and/or work in your jurisdiction

- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☒ Other preference(s) (list below)  
Households not currently receiving subsidized housing

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

Date and Time

Former Federal preferences

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing ☐ Owner, Inaccessibility, Property Disposition)
- ☐ Victims of domestic violence
- ☐ Substandard housing
- ☐ Homelessness
- ☐ High rent burden

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans’ families
- ☐ Residents who live and/or work in your jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- ☐ Date and time of application
- ☐ Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)
- ☐ This preference has previously been reviewed and approved by HUD
- ☐ The PHA requests approval for this preference through this PHA Plan
6. Relationship of preferences to income targeting requirements: (select one)
- ☐ The PHA applies preferences within income tiers
- ☐ Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Special Purpose Section 8 Assistance Programs**

- a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)
- ☒ The Section 8 Administrative Plan
- ☒ Briefing sessions and written materials
- ☐ Other (list below)
- b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?
- ☒ Through published notices
- ☐ Other (list below)



## **4. PHA Rent Determination Policies**

[24 CFR Part 903.7 9 (d)]

### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

#### **(1) Income Based Rent Policies**

Describe the PHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

- ☒ The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- ☐ The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- ☐ \$0  
☒ \$1-\$25  
☐ \$26-\$50

2. ☐ Yes ☒ No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

3. If yes to question 2, list these policies below:

c. Rents set at less than 30% than adjusted income

1. ☐ Yes ☒ No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

☐ For the earned income of a previously unemployed household member

☒ For increases in earned income

☐ Fixed amount (other than general rent-setting policy)

If yes, state amount/s and circumstances below:

☒ Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

20% of income from employment is disregarded from the rent calculation

☐ For household heads

☐ For other family members

☐ For transportation expenses

☐ For the non-reimbursed medical expenses of non-disabled or non-elderly families

☒ Other (describe below)

Residents paying child support may receive a deduction of up to \$480 in their adjusted income for purposes of calculating rent.

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

☒ Yes for all developments

☐ Yes but only for some developments

☐ No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

☒ For all developments

☐ For all general occupancy developments (not elderly or disabled or elderly only)

☐ For specified general occupancy developments

☐ For certain parts of developments; e.g., the high-rise portion

☐ For certain size units; e.g., larger bedroom sizes

☐ Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- ☒ Market comparability study
  - ☒ Fair market rents (FMR)
  - ☐ 95<sup>th</sup> percentile rents
  - ☒ 75 percent of operating costs
  - ☒ 100 percent of operating costs for general occupancy (family) developments
  - ☐ Operating costs plus debt service
  - ☒ The "rental value" of the unit
  - ☐ Other (list below)
- The ceiling rents were determined after reviewing a number of the above factors.

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- ☐ Never
  - ☐ At family option
  - ☐ Any time the family experiences an income increase
  - ☐ Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)\_\_\_\_\_
  - ☒ Other (list below)
- Anytime there is a change in income source.

g. ☐ Yes ☒ No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

## **(2) Flat Rents**

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- ☒ The section 8 rent reasonableness study of comparable housing

- ☐ Survey of rents listed in local newspaper
- ☐ Survey of similar unassisted units in the neighborhood
- ☒ Other (list/describe below)  
A variety of factors were considered in establishing flat rents, including examining the Fair Market Rents, the quality of the unit, and the quality of the housing.

## B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### (1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- ☐ At or above 90% but below 100% of FMR
- ☒ 100% of FMR (exception rents up to 110% of FMR allowed in certain low property neighborhoods)
- ☐ Above 100% but at or below 110% of FMR
- ☐ Above 110% of FMR (if HUD approved; describe circumstances below)  
Exception rent allowed in certain low property neighborhoods.

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- ☐ FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☐ The PHA has chosen to serve additional families by lowering the payment standard
- ☐ Reflects market or submarket
- ☐ Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- ☐ FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☐ Reflects market or submarket
- ☐ To increase housing options for families
- ☐ Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- ☒ Annually  
☐ Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- ☒ Success rates of assisted families  
☒ Rent burdens of assisted families  
☐ Other (list below)

## **(2) Minimum Rent**

a. What amount best reflects the PHA's minimum rent? (select one)

- ☐ \$0  
☒ \$1-\$25  
☐ \$26-\$50

b. ☐ Yes ☒ No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

## **5. Operations and Management**

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

*CMHA is submitting a high performing streamlined plan, however, documents showing CMHA management structure and operating procedures are available for local review.*

### **A. PHA Management Structure**

Describe the PHA's management structure and organization.

(select one)

- ☐ An organization chart showing the PHA's management structure and organization is attached.
- ☐ A brief description of the management structure and organization of the PHA follows:

### **B. HUD Programs Under PHA Management**

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate that the PHA does not operate any of the programs listed below.)

<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing		
Section 8 Vouchers		
Section 8 Certificates		
Section 8 Mod Rehab		
Special Purpose Section 8 Certificates/Vouchers (list individually)		
Public Housing Drug Elimination Program (PHDEP)		
Other Federal Programs(list individually)		

### **C. Management and Maintenance Policies**

List the PHA's public housing management and maintenance policy documents, manuals and handbooks that contain the Agency's rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

(1) Public Housing Maintenance and Management: (list below)

(2) Section 8 Management: (list below)

## **6. PHA Grievance Procedures**

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6.  
Section 8-Only PHAs are exempt from sub-component 6A.

*CMHA is completing a high performing streamlined plan submission.  
However, CMHA's Grievance Procedure conforms with federal  
regulations and is available for local review.*

### **A. Public Housing**

1. ☐ Yes ☐ No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)
- ☐ PHA main administrative office
  - ☐ PHA development management offices
  - ☐ Other (list below)

### **B. Section 8 Tenant-Based Assistance**

1. ☐ Yes ☐ No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)
- ☐ PHA main administrative office
  - ☐ Other (list below): Section 8 Department



## **7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

### **A. Capital Fund Activities**

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

#### **(1) Capital Fund Program Annual Statement**

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

X      The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name)

-or-

☐      The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

#### **(2) Optional 5-Year Action Plan**

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

a. X Yes ☐ No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund? (if no, skip to sub-component 7B)

b. If yes to question a, select one:

X      The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name)

-or-

☐      The Capital Fund Program 5-Year Action Plan is provided below: (if selected, copy the CFP optional 5 Year Action Plan from the Table Library and insert here)

## B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- X Yes ☐ No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
- b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name: Lincoln Court
2. Development (project) number: OH 4-4
3. Status of grant: (select the statement that best describes the current status)

- ☒ Revitalization Plan under development
- ☐ Revitalization Plan submitted, pending approval
- ☐ Revitalization Plan approved
- ☐ Activities pursuant to an approved Revitalization Plan underway

1. Development name: Laurel Homes
2. Development (project) number: OH 4-03, OH 4-08
3. Status of grant: (select the statement that best describes the current status)

- ☐ Revitalization Plan under development
- ☐ Revitalization Plan submitted, pending approval
- ☐ Revitalization Plan approved
- ☒ Activities pursuant to an approved Revitalization Plan underway

- X Yes ☐ No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?
- If yes, list development name/s below:

OH 4-2/14 English Woods

- X Yes ☐ No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
- If yes, list developments or activities below:
- OH 4-2 English Woods

OH 4-3/8 Laurel Homes

OH 4-4 Lincoln Court

OH 4-39 Grandview

☒ Yes ☐ No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?

If yes, list developments or activities below:

## 8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1. X Yes ☐ No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

### 2. Activity Description

- ☐ Yes ☒ No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

Demolition/Disposition Activity Description
1a. Development name: English Woods Addition 1b. Development (project) number: OH 4-14
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(12/21/99)</u>
5. Number of units affected: 6 6. Coverage of action (select one) X Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 04/3/00 b. Projected end date of activity: 04/7/00

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Quebec Road 1b. Development (project) number: OH 4-27
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(03/02/02)</u>
5. Number of units affected: 4
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 2003 b. Projected end date of activity:

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Grandview Apartments 1b. Development (project) number: OH 4-39 and OH 4-38
2. Activity type: Demolition Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(08/10/00)</u>
5. Number of units affected: 0 (Land Only)
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 03/02/01 b. Projected end date of activity: 09/10/02

<b>Demolition/Disposition Activity Description</b>
1a. Development name: NC-City 1967 Scattered Sites
1b. Development (project) number: OH 4-23
2. Activity type: Demolition Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application X
4. Date application approved, submitted, or planned for submission: <u>(07/01/00)</u>
5. Number of units affected: 2
6. Coverage of action (select one) X Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 07-01-00 b. Projected end date of activity: 07-01-00

## **9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities**

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

1. ☒ Yes ☐ No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

### 2. Activity Description

- ☐ Yes ☒ No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

Designation of Public Housing Activity Description
1a. Development name: Park Eden
1b. Development (project) number: OH 4-22
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA’s Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: <u>(09/11/00)</u>
5. If approved, will this designation constitute a (select one) <input checked="" type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 177
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

## **10. Conversion of Public Housing to Tenant-Based Assistance**

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

### **A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act**

1. ☐ Yes ☒ No: Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If "No", skip to component 11; if "yes", complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

#### 2. Activity Description

- ☐ Yes ☐ No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If "yes", skip to component 11. If "No", complete the Activity Description table below.

<b>Conversion of Public Housing Activity Description</b>
1a. Development name:
1b. Development (project) number:
2. What is the status of the required assessment? <input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)
4. Status of Conversion Plan (select the statement that best describes the current status) <input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway



5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one)

- ☐ Units addressed in a pending or approved demolition application (date submitted or approved: \_\_\_\_\_)
- ☐ Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: \_\_\_\_\_)
- ☐ Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: \_\_\_\_\_)
- ☐ Requirements no longer applicable: vacancy rates are less than 10 percent
- ☐ Requirements no longer applicable: site now has less than 300 units
- ☐ Other: (describe below)

**B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937**

**C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937**

## **11. Homeownership Programs Administered by the PHA**

[24 CFR Part 903.7 9 (k)]

### **A. Public Housing**

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1. ☐ Yes ☒ No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

- ☐ Yes ☐ No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
1a. Development name: 1b. Development (project) number:
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)

5. Number of units affected:
6. Coverage of action: (select one)
- ☐ Part of the development
- ☐ Total development

## B. Section 8 Tenant Based Assistance

1. ☐ Yes ☐ No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

*CMHA is submitting a streamlined submission.*

### 2. Program Description:

#### a. Size of Program

- ☐ Yes ☐ No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- ☐ 25 or fewer participants
- ☐ 26 - 50 participants
- ☐ 51 to 100 participants
- ☐ more than 100 participants

#### b. PHA-established eligibility criteria

- ☐ Yes ☐ No: Will the PHA’s program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria? If yes, list criteria below:

## **12. PHA Community Service and Self-sufficiency Programs**

[24 CFR Part 903.7 9 (l)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

*CMHA is completing a high performing streamlined plan submission. However, more information about CMHA's Community Service and Self-Sufficiency Programs is contained in supporting documents. The Community Service & Self-Sufficiency Policy establishes CMHA's process for administering the Community Service Requirement. The Community Service & Self-Sufficiency Policy is an addendum to the CMHA Public Housing Admissions & Continued Occupancy Policy and Lease.*

### **A. PHA Coordination with the Welfare (TANF) Agency**

#### **1. Cooperative agreements:**

☐ Yes ☐ No: Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? DD/MM/YY

#### **2. Other coordination efforts between the PHA and TANF agency (select all that apply)**

- ☐ Client referrals
- ☐ Information sharing regarding mutual clients (for rent determinations and otherwise)
- ☐ Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- ☐ Jointly administer programs
- ☐ Partner to administer a HUD Welfare-to-Work voucher program
- ☐ Joint administration of other demonstration program
- ☐ Other (describe)

### **B. Services and programs offered to residents and participants**

#### **(1) General**

##### **a. Self-Sufficiency Policies**

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas?

(select all that apply)

- ☐ Public housing rent determination policies
- ☐ Public housing admissions policies
- ☐ Section 8 admissions policies

- ☐ Preference in admission to section 8 for certain public housing families
- ☐ Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- ☐ Preference/eligibility for public housing homeownership option participation
- ☐ Preference/eligibility for section 8 homeownership option participation
- ☐ Other policies (list below)

b. Economic and Social self-sufficiency programs

- ☐ Yes ☐ No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use. )

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)

**(2) Family Self Sufficiency program/s**

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: DD/MM/YY)

Public Housing	N/A	N/A
Section 8		

- b. ☐ Yes ☐ No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?  
If no, list steps the PHA will take below:

### C. Welfare Benefit Reductions

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)
- ☐ Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
  - ☐ Informing residents of new policy on admission and reexamination
  - ☐ Actively notifying residents of new policy at times in addition to admission and reexamination.
  - ☐ Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
  - ☐ Establishing a protocol for exchange of information with all appropriate TANF agencies
  - ☐ Other: (list below)

### D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937

### **13. PHA Safety and Crime Prevention Measures**

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

#### **A. Need for measures to ensure the safety of public housing residents**

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- ☐ High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- ☒ High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- ☐ Residents fearful for their safety and/or the safety of their children
- ☐ Observed lower-level crime, vandalism and/or graffiti
- ☐ People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- ☐ Other (describe below)

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- ☒ Safety and security survey of residents
- ☒ Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- ☐ Analysis of cost trends over time for repair of vandalism and removal of graffiti
- ☐ Resident reports
- ☐ PHA employee reports
- ☒ Police reports
- ☐ Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- ☒ Other (describe below)  
Annual Survey

3. Which developments are most affected? (list below)

Lincoln Court, Laurel Homes, English Woods, Millvale, Findlater Gardens and Winton Terrace.

**B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year**

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- ☒ Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- ☒ Crime Prevention Through Environmental Design
- ☒ Activities targeted to at-risk youth, adults, or seniors
- ☒ Volunteer Resident Patrol/Block Watchers Program
- ☐ Other (describe below)

2. Which developments are most affected? (list below)

Lincoln Court, Laurel Homes, English Woods, Millvale, Findlater Gardens and Winton Terrace.

**C. Coordination between PHA and the police**

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- ☐ Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- ☒ Police provide crime data to housing authority staff for analysis and action
- ☒ Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- ☐ Police regularly testify in and otherwise support eviction cases
- ☒ Police regularly meet with the PHA management and residents
- ☐ Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- ☐ Other activities (list below)

2. Which developments are most affected? (list below)

Lincoln Court, Laurel Homes, English Woods, Millvale, Findlater Gardens and Winton Terrace.

**D. Additional information as required by PHDEP/PHDEP Plan**

PHAs eligible for FY 2000 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- ☒ Yes ☐ No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- ☒ Yes ☐ No: Has the PHA included the PHDEP Plan for FY 2000 in this PHA Plan?



☒ Yes ☐ No: This PHDEP Plan is an Attachment. (Attachment Filename: OH004a01)

#### **14. RESERVED FOR PET POLICY**

[24 CFR Part 903.7 9 (n)]

*AS OF APRIL 12, 2000, HUD HAS NOT ISSUED INSTRUCTIONS ON FORM-50075 FOR SUBMITTING THE PET POLICY. HOWEVER, CMHA HAS DEVELOPED A PET POLICY IN ACCORDANCE WITH THE PROPOSED PET POLICY REGULATIONS ISSUED BY HUD. THE PET POLICY IS AN ADDENDUM TO THE PUBLIC HOUSING ADMISSIONS & CONTINUED OCCUPANCY POLICY AND LEASE. CMHA RESERVES THE RIGHT TO MAKE REVISIONS TO THE PET POLICY TO COMPLY WITH ANY DEVIATIONS THE POLICY MAY HAVE WITH THE FINAL REGULATIONS ISSUED BY HUD.*

## **15. Civil Rights Certifications**

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

## **16. Fiscal Audit**

[24 CFR Part 903.7 9 (p)]

1. ☒ Yes ☐ No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?  
(If no, skip to component 17.)
2. ☒ Yes ☐ No: Was the most recent fiscal audit submitted to HUD?
3. ☐ Yes ☒ No: Were there any findings as the result of that audit?
4. ☐ Yes ☐ No: If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain? \_\_\_\_\_
5. ☐ Yes ☐ No: Have responses to any unresolved findings been submitted to HUD?  
If not, when are they due (state below)?

## **17. PHA Asset Management**

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component.  
High performing and small PHAs are not required to complete this component.

*CMHA is submitting a high performing streamlined application, however, many of CMHA's asset management objectives are outlined in supporting documents, such as the Comprehensive Grant Five Year Action Plan.*

1. ☐ Yes ☐ No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
  
2. What types of asset management activities will the PHA undertake? (select all that apply)
  - ☐ Not applicable
  - ☐ Private management
  - ☐ Development-based accounting
  - ☐ Comprehensive stock assessment
  - ☐ Other: (list below)
  
3. ☐ Yes ☐ No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

## **18. Other Information**

[24 CFR Part 903.7 9 (r)]

### **A. Resident Advisory Board Recommendations**

1. ☒ Yes ☐ No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
- ☐ Attached at Attachment (File name)
- ☒ Provided below:

<p><b><i>COMMENTS FROM THE LEGAL AID SOCIETY OF CINCINNATI ON BEHALF OF THE RESIDENT ADVISORY BOARD</i></b></p>
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The Cincinnati Metropolitan Residents Advisory Authority Board (CMRAAB) is the jurisdiction-wide resident organization representing all residents in CMHA's public housing programs. CMRAAB wishes to make the following recommendations regarding CMHA's Five Year and Annual Plan pursuant to 24 C. F. R. 903.13.

### **Preservation of Public Housing**

In Part 8 of the Plan, the section regarding Demolition and the Sale of Public Housing, and Part 100, regarding the Conversion of Public Housing to Section 8, CMRAAB recommends that CMHA develop a policy that ensures no net loss of physical housing units. Any housing units that are demolished, sold or otherwise disposed of should be replaced on a one for one basis. Replacing actual physical units with Section 8 certificates would meet this commitment. While CMRAAB is certainly in favor of an increase in the amount of Section 8 certificates that are made available to low income families, and is in favor of making certificates available to any family that is displaced from public housing, CMRAAB feels that any net loss of housing units is detrimental to the interests of public housing residents in the long run.

### **Senior Only Housing**

With respect to Part 9 of the plan, dealing with the Designation of Housing for Elderly and Disabled Tenants, CMRAAB supports CMHA's plans regarding designating certain developments as senior only communities. While CMRAAB does support CMHA providing accessible housing to and accommodating the needs of disabled individuals, CMRAAB supports a plan which would give senior residents the choice to select a senior only community.

### **Hope VI Right to Remain**

In reference to Part 8 and Part 3, regarding Eligibility and Admissions Policies, of the plan, CMRAAB supports the rights of all tenants displaced by Hope VI programs at Lincoln Court and Laurel Homes to return to the development once renovations have been

completed. Specifically in terms of Part 3, CMRAAB also requests that CMHA include site based waiting lists in its new admission policies.

### Admissions-Low Income Families and Targeting

With respect to Part 3 and the current draft of the new CMHA Admissions and Continued Occupancy Policy (“A&O Policy”), CMRAAB has several recommendations. Regarding Section E of the A&O Policy, The Preference System, CMRAAB feels that there is a discrepancy or contradiction with respect to subsection 3, Local Preference. Tier 1 includes families whose income is between 0% and 30% of area median income (“AMI”). According to the 1998 Housing Act, this group must constitute at least 40% of all CMHA admissions. However, Tier II, including families from 31% to 80% AMI, is targeted at 60% of admissions, this policy would seem to insure that no more (as opposed to no less) than 40% of admissions will go to very low income families.

Tier I very low income families should be targeted at a much higher percentage, at least 60%. These are the families that are most vulnerable and most in need of safe and affordable housing. Furthermore, Tier II should focus on families between 31% and 50% (as opposed to the current 80%) and this tier should be targeted at 40% or less. In Hamilton County, 50% of AMI for a family of four is \$25, 500. The Hamilton County Consolidated Plan shows that families in the 0%-30% AMI range as a higher priority than families in the 51%-80% AMI range. It would be quite unjust if a family with an income of \$30, 000 or even \$40, 000 in the 80% AMI range was selected for public housing ahead of a very low income family. Furthermore, higher income families should not be targeted for scattered sites units.

### Preference for Admissions to Homeless, Displaced and Victims of Domestic Violence

In reference to Part II, Section E, subsection 4 of the A&O Policy relating to Ranking Preference, CMRAAB recommends that in addition to preference for “working families”, CMHA should give ranking preferences to individuals and families who are homeless, who are displaced, either by government action, acts of nature, such as flooding or tornadoes, and other major tragedies such as house fires.

### Income and Rent Recertification

With respect to Part VII of the A&O Policy, the rent adjustment policy should be clarified. The current draft states that all changes in the composition or income must be reported within 10 days (as opposed to the previous 30 days), even though rent increases will not take place until the next annual rectification. While it may make sense to have the 10 day reporting requirement for changes in family composition, it seems unnecessary to insist that tenants have to report all income changes within 10 days if the rent is not going to be increased until the next annual recertification. This would place a great burden on both the tenants and CMHA administration unnecessarily. If CMHA is going to return to annual rent calculation

exclusively, residents should only be required to report income increases if they had previously been granted an interim rent reduction.

In reference to Part XII of the A&O Policy, CMRAAB recommends that a section be added to specifically address the new Earned Income Disregards mandated by the 1998 Housing Act. This section should include CMHA's policy for reviewing all tenant rental records for eligibility for this disregard back to October 1, 1999, the effective date of the disregard section. This policy should include retroactive credits for all eligible tenants. Furthermore, CMHA should develop a policy to locate and contact former

**-----END OF COMMENTS-----**

3. In what manner did the PHA address those comments? (select all that apply)

☐ Considered comments, but determined that no changes to the PHA Plan were necessary.

☒ The PHA changed portions of the PHA Plan in response to comments

List changes below:

CMHA made the following changes to the PHA Plan as a result of comments from the Resident Advisory Board:

1. CMHA removed language in the proposed Admissions and Continued Occupancy Policy that stated that the agency would target 60% of new admissions for households with incomes from 31% to 80% of the area median income. CMHA commits to ensuring that at least 40% of new admissions are families at or below 30% of the area median income, but will not put a cap on the percentage of new admissions from that group by stipulating that 60% of admissions must be families above 30% of the area median income.
2. In the proposed Admissions and Continued Occupancy Policy, CMHA stated that residents would have 10 days to report changes in income or household composition. After input from the Resident Advisory Board, CMHA increased the reporting time from 10 days to 14 business days.

☐ Other: (list below)

**B. Description of Election process for Residents on the PHA Board**

1. ☐ Yes ☒ No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2. ☐ Yes ☒ No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

The resident who serves on CMHA's Board of Commissioners is appointed by the Mayor of the City of Cincinnati with the advice and consent of the Cincinnati City Council.

### 3. Description of Resident Election Process

a. Nomination of candidates for place on the ballot: (select all that apply) N/A

- ☐ Candidates were nominated by resident and assisted family organizations
- ☐ Candidates could be nominated by any adult recipient of PHA assistance
- ☐ Self-nomination: Candidates registered with the PHA and requested a place on ballot
- ☐ Other: (describe)

b. Eligible candidates: (select one) N/A

- ☐ Any recipient of PHA assistance
- ☐ Any head of household receiving PHA assistance
- ☐ Any adult recipient of PHA assistance
- ☐ Any adult member of a resident or assisted family organization
- ☐ Other (list)

c. Eligible voters: (select all that apply) N/A

- ☐ All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- ☐ Representatives of all PHA resident and assisted family organizations
- ☐ Other (list)

### C. Statement of Consistency with the Consolidated Plan

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (provide name here)

City of Cincinnati, Ohio

Hamilton County, Ohio

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.



- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- Modernizing obsolete housing
  - Increasing assisted housing choices by expanding the Section 8 program
  - Providing support for self-sufficiency and supportive services programs
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

Both the City of Cincinnati and Hamilton County are providing support for CMHA's HOPE VI redevelopments. The City of Cincinnati's participation in the redesign of the streets, parks, and other amenities will allow the transformation of West End neighborhood where the Lincoln Court and Laurel Homes HOPE VI developments are located. Hamilton County is supporting the HOPE VI redevelopment by providing funding for affordable housing in areas of the county outside the City of Cincinnati, which will provide housing opportunities for residents leaving the HOPE VI properties. CMHA is looking forward to expanding its relationship with the City and Cincinnati and Hamilton County to other areas as well.

#### **D. Other Information Required by HUD**

Use this section to provide any additional information requested by HUD.

## **Attachments**

Use this section to provide any additional attachments referenced in the Plans.

**PHA Plan  
Table Library  
(ATTACHMENT A)**

**Component 7  
Capital Fund Program Annual Statement  
Parts I, II, and III**

**Annual Statement**

**Capital Fund Program (CFP) Part I: Summary**

Capital Fund Grant Number 709 FFY of Grant Approval: (08/2000)

X Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	
3	1408 Management Improvements	835,900
4	1410 Administration	846,000
5	1411 Audit	0
6	1415 Liquidated Damages	0
7	1430 Fees and Costs	540,000
8	1440 Site Acquisition	0
9	1450 Site Improvement	146,000
10	1460 Dwelling Structures	14,367,625
11	1465.1 Dwelling Equipment-Nonexpendable	0
12	1470 Nondwelling Structures	0
13	1475 Nondwelling Equipment	380,000
14	1485 Demolition	0
15	1490 Replacement Reserve	0
16	1492 Moving to Work Demonstration	0
17	1495.1 Relocation Costs	0
18	1498 Mod Used for Development	1,356,780
19	1502 Contingency	1,200,000
20	<b>Amount of Annual Grant (Sum of lines 2-19)</b>	<b>19,672,305</b>
21	Amount of line 20 Related to LBP Activities	0
22	Amount of line 20 Related to Section 504 Compliance	0
23	Amount of line 20 Related to Security	470,000

24	Amount of line 20 Related to Energy Conservation Measures	100,000
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**Annual Statement**

**Capital Fund Program (CFP) Part II: Supporting Table**

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
OH 4-1 WINTON TERRACE	Interior Painting	1460	200,000
	Learning Center	1460	360,000
OH 4-2/14 ENGLISH WOODS	Roof Repairs	1460	40,000
	Site Work	1450	30,000
	Interior Work	1460	175,000
OH 4-3/8 LAUREL HOMES	Hope VI		0
OH 4-4 LINCOLN COURT	Hope VI		0
OH 4-5/6 MILLVALE	Comprehensive Modernization	1460	5,000,000
OH 4-7 THE BEECHWOOD			0
OH 4-10/13 FINDLATER GARDENS	Comprehensive Modernization	1460	3,687,000
OH 4-11 MARQUETTE MANOR	Lobby Upgrade	1460	60,000
OH 4-16 SETTY KUHN	Structural Floor/Bedroom	1460	80,000
OH 4-17 STANLEY ROWE			0

OH 4-18 MARIANNA TERRACE			0
OH 4-19 MAPLE TOWER	Comprehensive Modernization	1460	650,000

### Annual Statement

### Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name <b>HA-Wide Activities</b>	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
OH 4-20 THE REDDING			0
OH 4-21 THE PRESIDENT			0
OH 4-22 PARK EDEN			0
OH 4-23 SCATTERED SITES			0
OH 4-25 THE RIVERVIEW	Wall Repair	1460	190,000
	Tuckpointing	1460	220,000
	Interior Painting	1460	195,000
OH 4-26 PINECREST			0
OH 4-28 WEBMAN COURT	Security Fence	1450	40,000
	Exterior Painting	1460	22,000
OH 4-29 QUEBEC/CLINTON SPRINGS	Kitchen Cabinets	1460	217,000
	Site Work	1450	56,000
	Screen Doors Replacement	1460	24,000

OH 4-30	Interior Renovation	1460	180,000
SCATTERED SITES	Exterior Repairs	1460	100,000
OH 4-36	Carpet Replacement	1460	18,000
HORIZON HILLS	Floor Repair	1460	160,000
OH 4-37	Kitchen Floors Structural	1460	150,000
SAN MARCO	Tuckpointing	1460	28,000
OH 4-38	Interior Repairs	1460	110,000
SCATTERED SITES	Exterior Repairs	1460	30,625

**Annual Statement**

**Capital Fund Program (CFP) Part II: Supporting Table**

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
OH 4-39	Interior Painting/Beacon Glen	1460	91,000
MANVILLE, PAT.	Driveway Repair	1450	20,000
GARDENS, BEACON	Roof Replacement	1460	31,000
GLEN, LEDGEWOOD	Rehab Bathroom/Patricia Garden	1460	32,000
	Drop Ceiling/Race Street	1460	50,000
	Exterior Painting/Tuckpointing/Patricia Garden	1460	18,000
OH 4-40 EDEN			
BLDG/WASHINGTON	Structural Floors/Eden Building	1460	156,000
TERRACE	Boiler Replacement/Eden Building	1460	100,000
OH 4-41 THE			
EVANSTON	Carpet Replacement	1460	180,000
OH 4-42-46	Interior Repair	1460	185,000
SCATTERED SITES	Exterior Repair	1460	188,000

**Annual Statement**

**Capital Fund Program (CFP) Part II: Supporting Table**

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
AGENCY WIDE	Resident Initiative & Economical Development	1408	500,000
	Security Guards	1408	230,000
	Training For Staff & Resident	1408	40,000
	One Accountant	1408	36,900
	Relocation/Transfer Specialist	1408	29,000
	Non Technical Salaries	1410.1	319,000
	Travel	1410.1	45,000
	Telephone Expense	1410.16	32,000
	Advertising	1410.19	60,000
	Fringe Benefits	1410.9	390,000
	Technical Salaries	1430	500,000
	Hazardous Material Consultant	1430.2	40,000
	Building Acquisition	1440.1	0
	Hazardous Material Abatement	1460	140,000
	Impact Maintenance	1460	900,000
	Life Safety Systems	1460	200,000
	HVAC	1460	200,000
	Computer & Tech Upgrade	1475	100,000
	Maintenance/Management Equipment	1475.2	120,000
	Vehicles	1475.7	160,000
	Contingency	1502	1,200,000
	Funds for Development	1498	1,356,780



# Annual Statement

## Capital Fund Program (CFP) Part III: Implementation Schedule

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
OH 4-1 WINTON TERRACE	09/30/02	
OH 4-2/14 ENGLISH WOODS	09/30/02	
OH 4-3/3 LAUREL HOMES	09/30/02	
OH 4-4 LINCOLN COURT	09/30/02	
OH 4-5/6 MILLVALE	09/30/02	
OH 4-7 THE BEECHWOOD	09/30/02	
OH 4-10/13 FINDLATER GARDENS	09/30/02	
OH 4-11 MARQUETTE MANOR	09/30/02	
OH 4-16 SETTY KUHN	09/30/02	
OH 4-17 STANLEY ROWE	09/30/02	
OH 4-18 MARIANNA TERRACE	09/30/02	

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**Annual Statement**

**Capital Fund Program (CFP) Part III: Implementation Schedule**

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
OH 4-20 THE REDDING	09/30/02	
OH 4-21 THE PRESIDENT	09/30/02	
OH 4-22 PARK EDEN	09/30/02	
OH 23 SCATTERED SITES	09/30/02	
OH 4-25 THE RIVERVIEW	09/30/02	
OH 4-26 PINCREST	09/30/02	
OH 4-28 WEBMAN COURT	09/30/02	
OH 4-29 QUEBEC/CLINTON SPRINGS	09/30/02	
OH 4-30 SCATTERED SITES	09/30/02	
OH 4-36 HORIZON HILLS	09/30/02	
OH 4-37 SAN MARCO	09/30/02	

OH 4-38 SCATTERED SITES	09/30/02	
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**Annual Statement**

**Capital Fund Program (CFP) Part III: Implementation Schedule**

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
OH 4-39 MANVILLE, PAT. GARDENS, BEACON GLEN, LEDGEWOOD	09/30/02	
OH 4-40 EDEN BLDG., WASHINGTON TERRACE	09/30/02	
OH 4-41 EVANSTON	09/30/02	
OH 4-42-46 SCATTERED SITES	09/30/02	

## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years.  
Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal year. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-1	WINTON TERRACE	14	2.3	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Community Building Rehab Sewers/Sanitary Lines Boilers Gas lines Parking Lot Seal & Strip			40,000	2001
			90,000	2002
			450,000	2002
			45,000	2003
			68,000	2004
Total estimated cost over next 5 years			693,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-2	ENGLISH WOODS	40	4.9	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Roof Repair Hope VI Hope VI Hope VI			40,000	2001
			0	2002
			0	2003
			0	2004
			Total estimated cost over next 5 years	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-3/8	LAUREL HOMES	36	5.4	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Hope VI			0	2001
Hope VI			0	2002
Hope VI			0	2003
Hope VI			0	2004
Total estimated cost over next 5 years			0	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-4	LINCOLN COURT	10	2.8	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Hope VI			0	2001
Hope VI			0	2002
Hope VI			0	2003
Hope VI			0	2004
Total estimated cost over next 5 years			0	



Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-5/6	MILLVALE	11	2.8	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Comprehensive Modernization			5,000,000	2001
Comprehensive Modernization			5,000,000	2002
Comprehensive Modernization			5,000,000	2003
Comprehensive Modernization			2,500,000	2004
Total estimated cost over next 5 years			17,500,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-7	THE BEECHWOOD	1	0.7	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
<b>Hillside/Site Work</b> <b>Blacktop Driveway/Site Work</b> <b>Expansion Joints/Sealing</b> <b>Kitchen Cabinets</b>			<b>90,000</b>	<b>2001</b>
			<b>30,000</b>	<b>2001</b>
			<b>211,000</b>	<b>2002</b>
			<b>200,000</b>	<b>2003</b>
Total estimated cost over next 5 years			<b>531,000</b>	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-10/13	FINDLATER GARDENS	33	5.2	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Comprehensive Modernization Comprehensive Modernization Comprehensive Modernization Comprehensive Modernization			3,707,000	2001
			3,600,000	2002
			3,701,133	2003
			4,518,525	2004
Total estimated cost over next 5 years			15,526,658	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-11	MARQUETTE MANOR	16	11.6	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Kitchen & Bath Faucets Expansion Joint Seal Carpet Replace Site Work Parking Lot Paving/Sealing, Stripping and Handicap Signs			140,000	2001
			190,000	2001
			45,000	2001
			250,000	2003
			50,000	2004
Total estimated cost over next 5 years			675,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-16	SETTY KUHN	5	7.8	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Interior Painting			40,000	2001
Storm Sewer Replacement			200,000	2002
Tuckpoint/Seal			100,000	2003
Window Replacement			180,000	2004
Total estimated cost over next 5 years			520,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-17	STANLEY ROWE	11	2.6	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Seal Parking Lot			38,000	2003
Interior Wall Repair/Painting ( Stanley Rowe A&B)			370,000	2004
Total estimated cost over next 5 years			408,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-18	MARIANNA TERRACE	1	1.3	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Site Work Interior Renovation			100,000	2001
			150,000	2004
Total estimated cost over next 5 years			250,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-19	MAPLE TOWER	0	0.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Parking Lot Seal & Repair Security Fence Roof Seal Exterior Tuckpoint/Seal			28,000	2002
			190,000	2002
			35,000	2003
			250,000	2004
Total estimated cost over next 5 years			503,000	



Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-20	THE REDDING	1	1.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Seal Parking Lot Interior Painting			26,000	2002
			180,000	2004
Total estimated cost over next 5 years			206,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-21	THE PRESIDENT	2	2.1	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Interior Painting			200,000	2004
Total estimated cost over next 5 years			200,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-22	PARK EDEN	0	0.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Site Work			30,000	2002
Parking Lot			27,000	2002
Clean & Seal Structure			380,000	2003

Total estimated cost over next 5 years	437,000	
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Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
OH 4-23	SCATTERED SITES	1	3.6
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
			Planned Start Date (HA Fiscal Year)

Interior Renovation	150,000	2001
Site Work	25,000	2001
Interior Renovation	100,000	2003
Exterior Renovation	140,000	2003
Interior Renovation	150,000	2004
Exterior Renovation	150,000	2004
Total estimated cost over next 5 years		715,000

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development

<b>OH 4-25</b>	<b>THE RIVERVIEW</b>	<b>0</b>	<b>0.0</b>	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Roof Replacement			182,000	2001
Hillside Stabilization			178,000	2003
<b>Total estimated cost over next 5 years</b>			<b>360,000</b>	

<b>Optional 5-Year Action Plan Tables</b>
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Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-26	THE PINECREST	3	1.5	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Kitchen Cabinet Replacement (Phase I)			310,000	2002
Kitchen/Bath Faucets			91,000	2002
Interior Painting			260,000	2003
Kitchen Cabinets Replacement (Phase II)			296,000	2003
Hillside Stabilization			390,000	2004
Total estimated cost over next 5 years			1,347,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-28	WEBMAN COURT	0	0.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Site Work Furnace & HWT Roof Replacement			20,000	2002
			25,000	2003
			30,000	2004
Total estimated cost over next 5 years			75,000	



Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-29	QUEBEC/CLINTON SPRINGS	2	2.6	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Interior Painting Tuckpoint & Seal Roof Replacement			160,000	2001
			58,000	2002
			200,000	2004
Total estimated cost over next 5 years			418,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-30	SCATTERED SITES	2	3.9	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Interior Renovations Exterior Repairs Interior Renovations Exterior Repairs Interior Renovation Exterior Repairs Interior Renovation Exterior Repairs			220,000	2001
			150,000	2001
			98,000	2002
			90,000	2002
			190,000	2003
			150,000	2003
			250,000	2004
			140,000	2004
Total estimated cost over next 5 years			1,288,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-36	HORIZON HILLS	0	0.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Site Work Boiler Replacement Roof Replacement Hillside Stabilization Hillside Stabilization			25,000	2001
			35,000	2001
			56,000	2002
			90,000	2003
			90,000	2004
Total estimated cost over next 5 years			296,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-37	SAN MARCO	0	0.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Elevator Pit Rehab Interior Painting New Faucets/Shower Exterior Structural/Tuckpoint & Seal			195,000	2001
			29,000	2002
			22,000	2002
			120,000	2004
Total estimated cost over next 5 years			366,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-38	SCATTERED SITES	1	2.5	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Interior Repairs			110,000	2001
Exterior Repairs			120,000	2001
Interior Repairs			210,000	2002
Exterior Repairs			30,000	2002
Interior Repairs			110,000	2003
Exterior Repairs			30,000	2003
Interior Repairs			200,000	2004
Exterior Repairs			40,000	2004
Total estimated cost over next 5 years			850,000	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-39	SCATTERED SITES	3	2.1	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Interior Painting/Patricia Garden Replace Boilers/Race Street Interior Painting/Beacon Glen Exterior Painting/Beacon Glen Site Work/Manville Interior Painting/Hallway Upgrade/Manville Parking & Driveway Upgrade/Manville Interior Renovation/Galbraith Exterior Renovation/Galbraith Replacement windows Hillside Stabilization/Ledgewood			80,000	2001
			36,000	2001
			80,000	2001
			120,000	2001
			85,000	2002
			48,000	2002
			61,000	2003
			40,000	2003
			18,000	2003
			215,000	2003
			200,000	2004
			Total estimated cost over next 5 years	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-40	EDEN BLDG./WASINGTON TERRACE	7	3.8	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Replace HVAC/Washington Terrace Exterior Repair Site Work/Rockdale Interior Painting/Rockdale/Kasota Paint Exterior & Repair/Eden Bldg. Interior Repairs Comprehensive Modernization /Rockdale Interior Repairs Comprehensive Renovation /Kasota Exterior Repair			72,000	2002
			170,000	2002
			17,000	2002
			150,000	2002
			60,000	2002
			300,000	2002
			340,000	2003
			300,000	2003
			540,000	2004
			280,000	2004

Total estimated cost over next 5 years	2,229,000	
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Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-41	THE EVANSTON	0	0.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Parking Lot Repair			25,000	2002
Roof Repair			12,000	2003
Site Work			40,000	2004
Total estimated cost over next 5 years			77,000	



Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
OH 4-42-46	SCATTERED SITES	4	2.0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Interior Repair Interior Repair Exterior Repair Interior Repairs Exterior Repairs Interior Repairs Exterior Repairs			840,000	2001
			832,000	2002
			414,000	2002
			868,625	2003
			370,000	2003
			800,000	2004
			500,000	2004

Total estimated cost over next 5 years	4,624,625	
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Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
	MANAGEMENT NEEDS PHA WIDE		
Description of Needed Physical Improvements or Management Improvements		Estimated Cost	Planned Start Date (HA Fiscal Year)
RESIDENT INITIATIVE & ECONIMICAL DEVELOPMENT		1,850,000	2001
SECURITY GUARDS		920,000	2001
TRAINING FOR STAFF & RESIDENT		190,000	2001
ONE ACCOUNT		155,900	2001
RELOCATION/TRANSFER SPECILIST		127,000	2001
Total estimated cost over next 5 years		3,242,900	

# Public Housing Drug Elimination Program Plan

## ATTACHMENT B

**Note: THIS PHDEP Plan template (HUD 50075-PHDEP Plan) is to be completed in accordance with Instructions located in applicable PIH Notices.**

### Annual PHDEP Plan Table of Contents:

1. General Information/History
2. PHDEP Plan Goals/Budget
3. Milestones
4. Certifications

### Section 1: General Information/History

- A. Amount of PHDEP Grant \$ 1,536,480
- B. Eligibility type (Indicate with an "x") N1\_\_\_\_\_ N2\_\_\_\_\_ R XXX
- C. FFY in which funding is requested 2000
- D. Executive Summary of Annual PHDEP Plan

In the space below, provide a brief overview of the PHDEP Plan, including highlights of major initiatives or activities undertaken. It may include a description of the expected outcomes. The summary must not be more than five (5) sentences long

The Cincinnati Metropolitan Housing Authority (CMHA) proposes to implement services and programs for residents to lessen crime and substance abuse and promote self-sufficiency. PHDEP funding will support expanded security and law enforcement, job preparedness and retention and academic enrichment endeavors. Each programmatic effort will have clearly defined objectives that promote economic and educational development for CMHA residents.

## E. Target Areas

Complete the following table by indicating each PHDEP Target Area (development or site where activities will be conducted), the total number of units in each PHDEP Target Area, and the total number of individuals expected to participate in PHDEP sponsored activities in each Target Area.

PHDEP Target Areas (Name of development(s) or site)	Total # of Units within the PHDEP Target Area(s)	Total Population to be Served within the PHDEP Target Area(s)
Winton Terrace	608	1790
English Woods	699	1302
Laurel Homes Addition	251	192
Lincoln Court	672	890
Millvale South	270	728
Millvale North	305	905
Beechwood	148	151
Laurel Homes	831	1136
Findlater Gardens Addition	280	826
Marquette Manor	140	132
Findlater Gardens	359	1054
English Woods Addition	125	350
Setty Kuhn	64	178
Stanley Rowe	424	596
Marianna Terrace	76	211
Maple Tower	120	101
Redding	100	107
President	95	94
Park Eden	177	180
NC-City/67	28	150
Riverview House	109	115
Pinecrest	200	209
Quebec Rd/Clinton Springs	76	292
Webman Court	12	43
A/R-City/68	53	137
Horizon Hills	32	75
San Marco	30	32
NC-City/79	40	111
APT A/R-City/85	142	269
APT A/R-City/79	187	560
Evanston	100	102
A/R-County/86	39	135
A/R-City/86	47	150
A/R-County/88	50	157
A/R-City/88	45	169
A/R-County2/88	50	177
Total	6,984	13,930

## F. Duration of Program

Indicate the duration (number of months funds will be required) of the PHDEP Program proposed under this Plan (place an “x” to indicate the length of program by # of months. For “Other”, identify the # of months).

6 Months \_\_\_\_\_ 12 Months \_\_\_\_\_ 18 Months   X   24 Months \_\_\_\_\_ Other \_\_\_\_\_

## G. PHDEP Program History

Indicate each FY that funding has been received under the PHDEP Program (place an “x” by each applicable Year) and provide amount of funding received. If previously funded programs have not been closed out at the time of this submission, indicate the fund balance and anticipated completion date. For grant extensions received, place “GE” in column or “W” for waivers.

Fiscal Year of Funding	PHDEP Funding Received	Grant #	Fund Balance as of Date of this Submission	Grant Extensions or Waivers	Anticipated Completion Date
FY 1995	\$ 1,917,000	OH10DEP0040195	-0-		Completed
FY 1996	\$ 1,919,500	OH10DEP0040196	-0-		Completed
FY 1997	\$ 1,913,340	OH10DEP0040197	-0-		Completed
FY1998	\$ 1,898,779	OH10DEP0040198	\$1,174,689		11/30/00
FY 1999	\$ 1,592,809	OH10DEP0040199	\$1,592,809		12/1/01

## Section 2: PHDEP Plan Goals and Budget

### A. PHDEP Plan Summary

In the space below, summarize the PHDEP strategy to address the needs of the target population/target area(s). Your summary should briefly identify: the broad goals and objectives, the role of plan partners, and your system or process for monitoring and evaluating PHDEP-funded activities. This summary should not exceed 5-10 sentences.

CMHA’s strategy for the implementation of PHDEP initiatives is a coordinated combination of law enforcement and prevention services. CMHA proposes to expand law enforcement programs in order to further impact on crime related to substance abuse. The expansion of our existing partnership with the city of Cincinnati’s Police Division, utilization of private security guard services, and the implementation of special security initiatives represent CMHA’s proposed enhanced, coordinated drug-related crime, and violent crime reduction effort. Our drug prevention effort will focus on the funding of expanded job development and educational programs. CMHA’s prevention endeavor will encompass comprehensive job readiness and training, childhood development and academic enrichment and drug education for adults and youth.

## B. PHDEP Budget Summary

Enter the total amount of PHDEP funding allocated to each line item.

FY 2000 PHDEP Budget Summary	
Budget Line Item	Total Funding
9110 - Reimbursement of Law Enforcement	\$ 0
9120 - Security Personnel	\$ 250,000
9130 - Employment of Investigators	\$ 150,520
9140 - Voluntary Tenant Patrol	\$ 0
9150 - Physical Improvements	\$ 274,500
9160 - Drug Prevention	\$ 647,481
9170 - Drug Intervention	\$ 0
9180 - Drug Treatment	\$ 0
9190 - Other Program Costs	\$ 213,979
<b>TOTAL PHDEP FUNDING</b>	<b>\$1,536,480</b>

## C. PHDEP Plan Goals and Activities

In the tables below, provide information on the PHDEP strategy summarized above by budget line item. Each goal and objective should be numbered sequentially for each budget line item (where applicable). Use as many rows as necessary to list proposed activities (additional rows may be inserted in the tables). PHAs are not required to provide information in shaded boxes. Information provided must be concise—not to exceed two sentences in any column. Tables for line items in which the PHA has no planned goals or activities may be deleted.

9120 - Security Personnel					Total PHDEP Funding: \$ 250,000		
Goal(s)	Reduction of Part I crime in CMHA Hi-rise buildings by 1% over the 18 month period of the grant						
Objectives	Use Uniformed Security Officers to monitor entry areas of Hi-rise buildings to assist in preventing unauthorized persons entry to buildings for drug related crime and the violence associated with drugs.						
Proposed Activities	# of Person s Served	Target Population	Start Date	Expected Complete Date	PHEDep Funding	Other Funding (Amount /Source)	Performance Indicators
1.Uniformed Guard Service			9/01/00	3/30/01	\$ 250,000	\$ 255,000/ CMHA	Incident reports written
2.							
3.							

9130 - Employment of Investigators					Total PHDEP Funding: \$ 150,520		
Goal(s)	Reduction of Part I crime in CMHA communities by 1% over the 18 month period of the grant						
Objectives	Provide analytical data to CMHA management and Cincinnati Police officers regarding crime, arrests and police calls for service to address the illicit drug trade and the violent crime associated with drugs.						
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHEDep Funding	Other Funding (Amount /Source )	Performance Indicators
1.CMHA Investigators			9/01/00	3/1/02	\$146,520	\$15,000/CMHA	Complaints investigated and closed
2.Training			9/01/00	3/1/02	\$ 4,000	\$20,000/CMHA	
3.							

9150 - Physical Improvements					Total PHDEP Funding: \$ 274,500		
Goal(s)	Reduction of Part I crime in CMHA communities by 1% over the 18 month period of the grant						
Objectives	To reduce unauthorized access to Hi-rise buildings and to define space and limit access to trespassers on CMHA property						
Proposed Activities	# of Person s Served	Target Population	Start Date	Expected Complete Date	PHEDep Funding	Other Funding (Amount /Source)	Performance Indicators
1.Doors and Entry Access Panels at various Hi-rise Buildings			9/1/00	3/1/02	\$ 30,500	\$40,000 /CMHA	Incident reports
2.Fencing			9/1/00	3/1/02	\$244,000	\$150,000 /CMHA	Reduction in Part I crimes
3.							

9160 - Drug Prevention					Total PHDEP Funding: \$ 647,481		
Goal(s)							
Objectives							
Proposed Activities	# of Person s Served	Target Population	Start Date	Expected Complete Date	PHEDep Funding	Other Funding (Amount /Source)	Performance Indicators
1.Job Development		CMHA Adults	9/01/00	3/1/02	\$230,343	\$202,361 CMHA Match	Number of residents receiving job assistance and jobs
2Academic Enrichment.		CMHA Youth	3/01/00	3/1/02	\$417,138	\$202,362/ CMHA Match	Number of youth participating in basic (i.e., Sylvan Learning Center)

and after school  
academic enrichment  
programs

9190 - Other Program Costs					Total PHDEP Funds: \$ 213,979		
Goal(s)							
Objectives							
Proposed Activities	# of Person s Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1.Personnel			9/1/00	3/1/02	\$85,891	\$ 216,000 /CMHA Match	Number of residents served
2.Fringe Benefits.			19/1/00	3/1/02	\$ 27,485	\$ 69,600 /CMHA Match	Number of residents served
3.Supplies			9/1/00	3/1/02	\$ 1,500	\$ 3,500 /CMHA Match	Number of residents served
4.Equipment – Upgraded computers, software, telephone lines, wiring cost for Geographical Informational System (CAGIS)			9/1/00	3/1/02	\$ 80,947	\$ 120,000 /CMHA Match	Number of residents served
5. Other			9/1/00	3/1/02	\$ 18,156	\$ 20,000 /CMHA Match	Number of residents served

### Section 3: Expenditure/Obligation Milestones

Indicate by Budget Line Item and the Proposed Activity (based on the information contained in Section 2 PHDEP Plan Budget and Goals), the % of funds that will be expended (at least 25% of the total grant award) and obligated (at least 50% of the total grant award) within 12 months of grant execution.

Budget Line Item #	25% Expenditure of Total Grant Funds By Activity #	Total PHDEP Funding Expended (sum of the activities)	50% Obligation of Total Grant Funds by Activity #	Total PHDEP Funding Obligated (sum of the activities)
<i>e.g Budget Line Item # 9120</i>	<i>Activities 1, 3</i>		<i>Activity 2</i>	
9110				
9120	Activity 1	\$ 250,000	Activity 1	\$ 250,000
9130	Activity 1	\$ 146,520	Activity 1 & 2	\$ 146,520
9140				
9150				
9160	Activities 1,2	\$ 115,172 \$ 208,569	Activities 1,2	\$ 230,343 \$ 417,138
9170				
9180				
9190	Activities 1,2	\$ 56,688	Activities 1,2	\$ 113,377



<b>TOTAL</b>		\$ 776,949		\$ 1,157,378

#### **Section 4: Certifications**

A comprehensive certification of compliance with respect to the PHDEP Plan submission is included in the “PHA Certifications of Compliance with the PHA Plan and Related Regulations.”

**ADMISSIONS AND CONTINUED OCCUPANCY POLICY  
GOVERNING HUD-AIDED PUBLIC HOUSING OPERATED BY  
CINCINNATI METROPOLITAN HOUSING AUTHORITY  
ATTACHMENT C**

**Section I - Nondiscrimination**

**A. Compliance with Civil Rights Laws**

1. It is the policy of the Cincinnati Metropolitan Housing Authority (CMHA) to comply with all laws relating to Civil Rights, including but not limited to:
  - a. Title VI of the Civil Rights Act of 1964; **(See 24 CFR Part 1)**
  - b. Title VIII of the Civil Rights Act of 1968 (as amended by the 1974 HCDA and the Fair Housing Amendments Act of 1988); **(See 24 CFR Part 100)**
  - c. Executive Order 11063, Section 504 of the Rehabilitation Act of 1973; **(See 24 CFR Part 8)**
  - d. the Age Discrimination Act of 1975; **(See 24 CFR Part 146)**
  - e. Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern); **(Title II deals with common areas and public space, not living units.)**
  - f. any applicable State laws or local ordinances; and
  - g. any legislation protecting the individual rights of tenants, applicants or staff that may subsequently be enacted. **(Required, 24 CFR § 960.203)**
2. CMHA shall not discriminate because of race, color, national origin, sex, religion, familial status, or disability in the leasing, rental, or other disposition of housing or related facilities, including land, that is part of any project or projects under CMHA's jurisdiction covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof. **(Required, 24 CFR § 100.5)**
3. CMHA shall not, on account of race, color, national origin, sex, religion, familial status, or disability treat any family or person in the manner described below:
  - a. Deny anyone the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs;
  - b. Provide anyone housing that is different from that provided others<sup>1</sup>;
  - c. Subject anyone to segregation or disparate treatment;
  - d. Restrict anyone's access to any benefit enjoyed by others in connection with the housing program;

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<sup>1</sup> CMHA is not only permitted but is required to provide persons with disabilities with housing that is appropriate for their needs. This accessible or adaptable housing, although different from that provided to others, is permitted because it permits persons with disabilities to participate in the public housing program.

- e. Treat anyone differently in determining eligibility or other requirements for admission<sup>2</sup>;
  - f. Deny anyone access to the same level of services<sup>3</sup>; or
  - g. Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program.
4. CMHA shall not automatically deny admission to any group or category of otherwise qualified applicants (e.g., families with children born to unmarried parents or families whose head or spouse is a student). Each applicant in a particular group or category must be treated on an individual basis in the normal processing routine. **(Required, 24 CFR § 960.205)**
5. CMHA will identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all. In accordance with Section 504, and the Fair Housing Amendments Act of 1988, CMHA will make structural modifications to its housing and non-housing facilities **(Required, 24 CFR §§ 8.21, 8.23, 8.24, and 8.25)** and make reasonable accommodations in its procedures or practices **(Required, 24 CFR § 100.204)** to permit people with disabilities to take full advantage of the CMHA's housing program and non-housing programs.
- a. In making reasonable accommodations or structural modifications to existing housing programs **(See 24 CFR § 8.24)** or in carrying out Other Alterations **[See 24 CFR § 8.23(b)]** for otherwise qualified persons with disabilities, CMHA is **not** required to:
    - (1) Make each of its existing facilities accessible **[24 CFR § 8.24 (a) (1)]**; or make structural alterations when other methods can be demonstrated to achieve the same effect; **[24 CFR § 8.24 (b)]**
    - (2) Make structural alterations that require the removal or altering of a load-bearing structural member; **[24 CFR § 8.32 (c)]**
    - (3) Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level; **[24 CFR § 8.26]**
    - (4) Take any action that would result in a fundamental alteration in the nature of the program; **[24 CFR § 8.24 (a) (2)]** or
    - (5) Take any action that would result in an undue financial and administrative burden on the Authority. **[24 CFR § 8.24 (a) (2)]**
  - b. When CMHA is making substantial alterations **(defined in 24 CFR § 8.23)** as Comprehensive Modernization or work in developments with 15+ units, work whose value exceeds 75% of the replacement cost of the facility) to an existing housing facility CMHA is not required to:

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<sup>2</sup> Except that CMHA is obliged to offer reasonable accommodations to applicants with disabilities. This will not affect CMHA's screening or eligibility standards, but it might require CMHA to revise its procedures or practices in carrying out those standards.

<sup>3</sup> This requirement applies to services provided by CMHA and services provided by others with CMHA's permission on public housing property. Thus, a health screening program offered by the local health department in a public housing community room would have to be fully accessible to persons with disabilities.

- (1) Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level; **[24 CFR § 8.26]**
  - (2) Make structural alterations that require the removal or altering of a load-bearing structural member; **[24 CFR § 8.32 (c)]** or
  - (3) Make structural alterations to meet minimum accessibility requirements where it is structurally impracticable. Structural impracticability is defined as: Changes having little likelihood of being accomplished without removing or altering a load-bearing structural member and/or incurring an increased cost of 50% or more of the value of the element of the building or facility involved. **[24 CFR § 8.32 (c) and § 40, Uniform Federal Accessibility Standards, 3.5 and 4.1.6(3)]**
    - Note that the undue burdens test is not applicable to housing undergoing substantial alteration.
6. CMHA will not permit these policies to be subverted to do personal or political favors. CMHA will not offer units in an order different from that prescribed by this policy, since doing so violates the policy, federal law, and the civil rights of the other families on the waiting list. **[Required, 24 CFR § 906. 204 (a)(3)(ii)]**

## **B. Accessibility and Plain Language**

1. Facilities and programs used by residents must be accessible to a person in a wheelchair. Application and management offices, hearing rooms, community centers, day care centers, laundry facilities, craft and game rooms must be usable by residents with a full range of disabilities. If none of these facilities are already accessible (and located on accessible routes), some<sup>4</sup> must be made so, subject to the undue financial and administrative burden test. **(Required, 24 CFR § 8.20 and 8.21)**
2. Documents to be used by applicants and residents will be made available in formats accessible for those with vision or hearing impairments **(Required, 24 CFR § 8.6)**. The documents will be written simply and clearly to enable applicants with learning or cognitive disabilities to understand as much as possible. Unless prohibited by local law, documents may be translated into languages other than English as needed<sup>5</sup>.
3. Some aspects of eligibility, rent computation, applicant screening, reasonable accommodations, and lease compliance are complicated, but CMHA will present examples to help applicants and residents understand the issues involved. In writing materials for applicants and residents, CMHA staff will keep in mind that mental retardation, learning disabilities and cognitive disabilities may affect the applicant's ability to read or understand – so rules and benefits may have to be explained verbally, perhaps more than once. **(Required, 24 CFR § 8.6)**

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<sup>4</sup> It is not required that all public and common areas be made accessible so long as persons with disabilities have full access to all the types of facilities and activities available to persons without disabilities. Thus, not all laundry facilities need to be accessible so long as there are sufficient accessible laundry facilities for use by persons with disabilities at each development that provides laundry facilities.

<sup>5</sup> 24 CFR § 5.505 requires that any notice or document relative to citizen or eligible immigration status, where feasible, be provided to an applicant or tenant in a language that is understood by the individual if the individual is not proficient in English. In general, documents will be translated when there are sufficient numbers of applicants or residents speaking a language to warrant the expense.

4. At the point of initial contact with all applicants, CMHA staff will ask whether they need some form of communication other than plain language paperwork. Alternative forms of communication might include: sign language interpretation; having materials explained orally by staff, either in person or by phone; large type materials; information on tape; having someone (friend, relative or advocate) accompany the applicant to receive, interpret and explain housing materials; permitting applicants to file applications by mail; and permitting alternative sites for application taking. **(Required, 24 CFR § 8.6)**
5. Some applicants will not be able to read (or to read English), so intake staff must be prepared to read and explain anything that they would normally hand to an applicant to be read or filled out. Applicants who read or understand little English may furnish an interpreter who can explain what is going on. CMHA is not required to pay the costs associated with having a foreign language interpreter (as they are for a sign language interpreters for the hearing impaired **[Required, 24 CFR § 8.6]** because the Fair Housing law makes no such requirement).
6. At a minimum, CMHA will prepare the following information in plain-language accessible formats:
  - a. Marketing, promotional and informational materials;
  - b. Information about the application process;
  - c. How rents and utility allowances are determined;
  - d. The application form and required certifications;
  - e. All form letters and notices to applicants and residents;
  - f. General statement about reasonable accommodation;
  - g. Orientation materials for new residents;
  - h. The lease and house rules, if any;
  - i. Guidance or instructions about care of the housing unit;
  - j. Information about opening, updating or closing the waiting list;
  - k. All information related to applicant's rights (to informal hearings, etc.)

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

### **A. Affirmative Marketing**

1. 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 the 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 (**Affirmative Marketing Requirement**).
2. 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. **[Required, 24 CFR §109.30(a)]**;

- 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 their 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.

**A. Qualification for Admission**

- 1. It is CMHA's policy to admit **only** qualified applicants<sup>6</sup>.
- 2. An applicant is qualified if he or she meets all of the following criteria:
  - a. Is a family as defined in Section XII of this policy;
  - b. Meets the HUD requirements on citizenship or immigration status; **[Required, 24 CFR § 5.5 Subpart E]**
  - c. Has an Annual Income (as defined in Section XI of this document) at the time of admission that does not exceed the income limits (maximum incomes by family size established by HUD) posted in CMHA offices.
  - d. Provides documentation of Social Security numbers for all family members, age 6 or older, or certifies that they do not have Social Security numbers; **[Required, 24 CFR § 5.216]** and
  - e. Meets or exceeds the Applicant Selection Criteria set forth in Section II. F. of these policies **[Required, 24 CFR § 960.205]**, including attending and successfully completing a CMHA-approved pre-occupancy orientation session;
  - f. Has the legal capacity to execute a lease.

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<sup>6</sup> The term "qualified" refers to applicants who are eligible and able to meet the applicant selection standards. This term is taken from the 504 regs: **24 CFR § 8.3** Definition of qualified individual with handicaps. Eligibility is a term having specific meaning under the Housing Act of 1937. In order to be eligible, a family must meet four tests: (1) they must meet HA's definition of family; (2) have an Annual Income at or below program guidelines; (3) each family member, age 6 or older, must have a social security number or certify that he/she has no number; and (4) each family member receiving assistance must be a citizen or non-citizen with eligible immigration status per **24 CFR § 5.5** .

**A. Waiting List Management**

1. It is the policy of CMHA to administer its waiting list as required by the regulations at **24 CFR §§ 5.4, 5.5, 5.6, 960.201 through 960.215).**
2. Opening and Closing Waiting Lists
  - a. CMHA, at its discretion, may restrict application intake, suspend application intake, and close waiting lists in whole or in part. CMHA may open or close the list for persons with a high preference category, or by unit size or type available. See (c) below [**Required, 24 CFR § 5.410**].
  - b. For any unit size or type, if CMHA's highest waiting list preference category has sufficient applications to fill anticipated vacancies for the coming 12 months, CMHA may elect to: (a) close the waiting list completely; (b) close the list during certain times of the year; or (c) restrict intake by preference, type of project, or by size and type of dwelling unit [**Required, 24 CFR 5.410**].
  - c. Decisions about closing the waiting list will be based on the number of applications available for a particular size and type of unit, the number of applicants who qualify for a preference, and the ability of CMHA to house an applicant in an appropriate unit within a reasonable period of time (between twelve and eighteen months). A decision to close the waiting lists, restricting intake, or opening the waiting lists will be publicly announced.
  - d. During the period when the waiting list is closed, CMHA will not maintain a list of individuals who wish to be notified when the waiting list is re-opened.
3. Determining if the Waiting List may be Closed
  - a. CMHA will use its **Procedure on Opening and Closing the Waiting List**<sup>7</sup> to determine whether the waiting list(s) may be closed.
4. Updating the Waiting List
  - a. Beginning July 1, 2,000, CMHA will update each waiting list sublist (by unit type and BR size) at least once a year by contacting all applicants in writing<sup>8</sup>. If, after two attempts in writing<sup>9</sup>, no response is received, CMHA will withdraw the names of applicants from the waiting list. At the time of initial intake, CMHA will advise families of their responsibility to notify CMHA when their income, mailing address, phone numbers, or family composition changes.
  - b. CMHA will not remove an applicant's name from the waiting list except in accordance with its **Procedure on Updating the Waiting List and Removing Applications**.
5. Change in Preference Status While on the Waiting List

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<sup>7</sup> This policy refers to written procedures that cover, in this case, the closing of the waiting list. References to other administrative procedures is made periodically in the text of this policy. These procedures are separate documents that describe the work steps necessary to implement the policy choices made in this document. The procedures are for use by staff and may be modified or amended as needed without Board approval.

<sup>8</sup> Or by the method designated at initial application by applicants with disabilities.

<sup>9</sup> The first written communication will be sent by first class mail, the second written communication will be sent by First Class Mail.

- a. Families on the waiting list who did not qualify for a local or ranking preference when they applied may experience a change in circumstances that qualifies them for a preference. In such instances, it will be the family's duty to contact CMHA so that their status may be recertified or, depending on application processing status, reverified. Applicants whose preference status changes while they are on the waiting list will retain their original date and time of application.
- b. To the extent that CMHA determines that the family does now qualify for a preference, they will be moved up on the waiting list in accordance with their preference(s) and their date and time of application. They will then be informed in writing of how the change in status has affected their place on the waiting list.

#### A. Processing Applications for Admission

1. CMHA will accept and process applications in accordance with applicable HUD Regulations and CMHA's **Procedure on Taking Applications and Initial Processing**. CMHA will work on the assumption that the facts certified to by the applicant in the preliminary application are correct, although all those facts will be subject to verification later in the application process.
2. Interviews and Verification Process: As applicants approach the top of the waiting list, they will be contacted and requested to come to CMHA Leasing Office for an interview to complete their applicant file. Applicants who fail to attend their scheduled interview or who cannot be contacted to schedule an interview will have their applications withdrawn, subject to reasonable accommodations for people with disabilities.
  - a. The following items will be verified according to CMHA's **Procedure on Verification**, to determine qualification for admission to CMHA's housing:
 

(1)	Family composition and type (Elderly/Disabled/near elderly /non-elderly)
(2)	Annual Income
(3)	Assets and Asset Income
(4)	Deductions from Income
(5)	Preferences
(6)	Social Security Numbers of all Family Members Age 6+
(7)	Information Used in Applicant selection
(8)	Citizenship or eligible immigration status
  - b. Third party written verification is the preferred form of documentation to substantiate applicant or resident claims. CMHA may also use (1) phone verifications with the results recorded in the file, dated, and signed by CMHA staff, (2) review of documentation, and, if no other form of verification is available, (3) applicant certification. Applicants must cooperate fully in obtaining or providing the necessary verifications.
  - c. Verification of eligible immigration status shall be carried out pursuant to **24 CFR § 5.5**. Citizens are permitted to certify to their status.



3. Applicants reporting zero income will be asked to complete a family expense form. This form will be the first completed in the interview process. The form will ask applicants to document how much they spend on: food, transportation, health care, child care, debts, household items, etc. and what the source of income is for these expenses. It will also ask applicants about the status of any application or benefits through TANF or other similar programs. (If a “zero income” family is admitted, redeterminations of income will be performed every 60 days. See Section 3. C, Periodic Reexaminations, of this policy.)
4. CMHA’s records with respect to applications for admission to any low-income housing assisted under the United States Housing Act of 1937, as amended, shall indicate for each application the date and time of receipt; The applicant’s race and ethnicity; the determination by CMHA as to eligibility or ineligibility of the applicant; when eligible, the unit size(s) for which eligible; the preference, if any; and the date, location, identification, and circumstances of each vacancy offered and accepted or rejected. **[Required, 24 CFR § 85.42]**

#### A. The Preference System

1. **It is CMHA's policy that a preference does not guarantee admission.** Preferences are used to establish the order of placement on the waiting list. Every applicant must still meet CMHA's Resident Selection Criteria (described later in this policy) before being offered a unit.
2. Factors other than preferences that affect the selection of applicants from the waiting list  
**[Required, 24 CFR § 5.410 (d)]**
  - a. Before applying its preference system, CMHA will first match the characteristics of the available unit to the applicants available on the waiting list. Factors such as unit size, accessibility features, or type of project, limit the admission of families to those households whose characteristics “match” the characteristics and features of the vacant unit available.
  - b. By matching unit and family characteristics, it is possible that families lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application, or ahead of families with a higher preferences (e.g. the next unit available is an accessible unit and the only applicant family needing such features is in the non-preference pool, i.e. having no preference).
  - c. Factors other than the preference system that affect applicant selection for unit offers are described below:
    - (1) When selecting a family for a unit with **accessible features**, CMHA will give a preference to families that include persons with disabilities who can benefit from the unit’s features. First preference will be given to existing tenant families seeking a transfer and second preference will be given to applicant families. If no family needing accessible features can be found for a unit with accessible features, CMHA will house a family not needing the unit features, subject to the requirement in the Tenant Selection and Assignment Plan, under which a non-disabled family in an accessible unit can be required to move so that a family needing the unit features can take advantage of the unit.
    - (2) When selecting a family for a unit in housing designated for elderly families, or disabled families, if any, CMHA will give a priority to elderly, disabled or near elderly families as described later in this section.

- (3) When selecting a family for a unit in a mixed population development (a property that houses both elderly and disabled families, as opposed to a general occupancy development that houses non-elderly families as well), CMHA will give a priority to elderly families and disabled families as described later in this section.
- (4) When selecting a single person at a Mixed Population development, elderly, disabled or displaced single persons have priority over singles who are not elderly, disabled or displaced regardless of preferences. Single applicants who are not elderly, disabled or displaced can only be admitted after all elderly or disabled families or single displaced persons have been offered units. **[Required, 24 CFR § 960.407]**
- (5) Police officers and their families may be admitted as residents to developments that could benefit from their presence. Their admission is not subject to the waiting list, nor to income eligibility, but prior HUD approval is required. **[24 CFR § 960.505]**

Preferences will be granted to applicants who are otherwise qualified and who, at the time of the unit offer (prior to execution of a lease), meet the definitions of the preferences described below.

3. Local Preference

- a. There is one local preference in effect based on ranges of income. Applicants will be grouped as follows:
  - (1) **Tier I:** Families with incomes between 0% and 30% of area median income (this group **must** constitute at least 40% of all admissions in any year);
  - (2) **Tier II:** Families with incomes between 31% and 80% of area median income (the target for this group is 60% of all admissions in any year); and
- b. At least 40% of all applicants admitted in any year must be applicants from Tier I. This is a requirement of the Quality Housing and Work Responsibility Act of 1998.

4. Ranking Preference

- a. There is one possible ranking preferences in effect: a **Working Family** (as defined in Section XII). **CMHA's Procedure on Unit Offers and Applicant Placement** will be used to order the Waiting List and make unit offers.
- b. Families that do not qualify for the Working Family preferences will be categorized as No-preference families.

5. Mixed Population Buildings Local Preference

In addition to the Income Tier preference, which applies to all CMHA's developments, CMHA elects to retain the former Federally mandated priority for single persons who are either elderly, persons with disabilities, or persons displaced by governmental action over all other single persons when filling vacancies in its Mixed Population buildings.

6. Method of Applying Preferences

To ensure that CMHA admits the statutorily required 40% of applicants per year with incomes in Tier I and, at the same time, does not create concentrations of families by income at any of its properties, CMHA will rank applicants within both income tiers as Natural Disaster, Upward Mobility or no-preference. Four out of every ten applicants admitted will be from Tier I. If there are insufficient applications among the Tier I Natural Disaster preference holders, Tier I Upward Mobility preference holders will be selected. If there are insufficient Upward Mobility preference holders, staff will make offers to the No-preference applicants in Tier I. Within each of the ranking preference categories, offers will be made by oldest application. [See 24 CFR § 960.211 (b)] The remaining six out of every ten applicants admitted, will be from Tier II, subject to the same ranking preferences sorted by application date and time.

- a. CMHA will house applicants from Tiers I and II on the waiting list by selecting first from the Working Family applicants, then by selecting from the No-preference applicants within each Tier.
- b. CMHA will also offer units to existing residents on the transfer list. Some types of transfers are processed before new admissions and some types of transfers are processed with new admissions, using a ratio set forth in the Tenant Selection and Assignment Plan (TSAP). Transfers do not count toward the 40% Tier I requirement.
- c. CMHA will neither hold units vacant for prospective applicants with preferences, nor will it relax eligibility or screening criteria to admit otherwise unqualified applicants with preferences.

7. Definition of Working Family Preference

CMHA defines Working Families to include applicants with at least one adult member who can document employment. Additionally, persons who cannot work because of age or disability qualify for this ranking preference.

8. Withholding Preferences

As required by law, CMHA will withhold a preference from an applicant if any member of the applicant family is a person evicted from housing assisted under the 1937 Housing Act during the past three years because of drug-related or criminal activity that threatens the health, safety or peaceful enjoyment of other residents or CMHA staff. [Required, 24 CFR § 5.410 (a) (3)] CMHA will not grant an admission preference within three years of eviction to any family when the reason for eviction is related to drug trafficking or drug manufacture. CMHA may grant an admissions preference in any of the following cases:

- a. If CMHA determines that the evicted person has successfully completed a rehabilitation program approved by CMHA;
- b. If CMHA determines that the evicted person clearly did not participate in or know about the drug-related criminal activity; or
- c. If CMHA determines that the evicted person no longer participates in any drug-related or criminal activity that threatens the health, safety or right to peaceful enjoyment of other tenants or staff of CMHA.

9. Designated Housing

The preference system described above will work in combination with requirements to match the characteristics of the family to the type of unit available, including developments with HUD-approved designated populations, if any. When such matching is required or permitted by current

law, CMHA will give preference to the families described below. The ability to provide preferences for some family types will depend on unit size available.

- a. **Projects designated for the elderly:**<sup>10</sup> Elderly families will receive a priority for admission to units or buildings covered by a HUD-approved Designation Plan. When there are insufficient elderly families on the waiting list, near-elderly families (head or spouse ages 50 to 61) will receive a priority for this type of unit.
- b. **Projects designated for disabled families:**<sup>11</sup> Disabled families will receive a priority for admission to units or buildings that are covered by a HUD-approved Designation Plan.
- c. **Mixed population Projects**<sup>12</sup>: Elderly families, disabled families and families displaced by governmental action will receive equal priority for admission to such units.  
  
All elderly, disabled or displaced applicants who are single persons shall be admitted before single persons who are not elderly, disabled nor displaced.
- d. **General Occupancy Projects:** The priority for elderly and disabled families and displaced persons over single persons does not apply at General Occupancy Properties.

10. Administration of the Preferences

- a. Depending on the time an applicant may have to remain on the waiting list, CMHA will either verify preferences at the time of application (when there is no waiting list or the waiting list is very short) or require that applicants certify to their qualification for a preference at the time of pre-application (when the wait for admission exceeds four months). Verification of preferences is one of the earliest steps in processing waiting list families for admission. Preference verifications shall be no more than 120 days old at the time of certification.
- b. At the time of pre-application, CMHA will use a pre-application to obtain the family's certification that it qualifies for a preference. Between pre-application and the application interview, the family will be advised to notify CMHA of any change that may affect their ability to qualify for a preference.
- c. Applicants that are otherwise eligible and self-certified as qualifying for a preference will be placed on the waiting list in the appropriate applicant pool.

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<sup>10</sup> This reference is to buildings or portions of buildings designated for the elderly by following HUD's requirements. Designation of housing for the elderly requires the preparation of a designated housing plan. The plan must be presented to HUD for review and approval.

<sup>11</sup> Buildings, floors and units can also be designated for disabled families, also by following the HUD requirements. This entails preparing a designated housing plan noting which buildings (if any) will be set aside for disabled families. HUD approval is required for the plan.

<sup>12</sup> A mixed population project is a property (or portion of a property) that was: reserved for elderly and disabled families at its inception and has retained that character; or the CMHA obtained HUD approval to retain the property for elderly and disabled families. These projects were formerly known as elderly projects.

- d. Applicants that self-certify to a preference at the time of pre-application and cannot verify current preference status at the time of certification will lose their preference status and their standing on the waiting list.
- e. Families that cannot qualify for any of the preferences will be moved into the No-preference category, and to a lower position on the waiting list based on date and time of application.
- f. Families that claim a preference at pre-application, but do not qualify for a preference at the time of application interview, will be notified in writing and advised of their right to an informal meeting as described below. If otherwise qualified, the family's application will then be placed on the waiting list in the appropriate No-preference category.

11. Notice and Opportunity for a Meeting [Required, 24 CFR § 960.211 (e)]

If an applicant claims but does not qualify for a preference, the applicant can request a meeting:

- a. CMHA will provide a written notice if an applicant does not qualify for a preference. This notice shall contain: a brief statement of the reasons for the determination, and a statement that the applicant has the right to meet with CMHA's designee to review the determination.
- b. If the applicant requests the meeting, CMHA shall designate an officer or employee to conduct the meeting. This person(s) can be the person who made the initial determination or reviewed the determination of his or her subordinate, or any other person designated by the CMHA. A written summary of this meeting shall be made and retained in the applicant's file.
- c. The applicant will be advised that he/she may exercise other rights if the applicant believes that illegal discrimination, based on race, color, national origin, religion, age, disability, or familial status has contributed to CMHA's decision to deny the preference.

**A. Applicant Selection Criteria**

- 1. It is CMHA's policy that all applicants shall be screened in accordance with HUD's regulations (**24 CFR § 960**) and sound management practices. During screening, CMHA will require applicants to demonstrate ability to comply with essential provisions of the lease as summarized below:
  - a. to pay rent and other charges (e.g. utility bills) as required by the lease in a timely manner;
  - b. to care for and avoid damaging the unit and common areas;
  - c. to use facilities and equipment in a reasonable way;
  - d. to create no health, or safety hazards, and to report maintenance needs;
  - e. not to interfere with the rights and peaceful enjoyment of others, and to avoid damaging the property of others;

- f. not to engage in criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents or staff; and not to engage in drug-related criminal activity; and
  - g. to comply with necessary and reasonable rules and program requirements of HUD and CMHA.
2. How CMHA will check ability to comply with essential lease requirements:
- a. Applicant ability and willingness to comply with the essential lease requirements will be checked and documented in accordance with CMHA's **Procedure on Applicant Selection**. Information to be considered in completing applicant screening shall be reasonably related to assessing the conduct of the applicant and other family members listed on the application, in present and prior housing.
  - b. The history of applicant conduct and behavior must demonstrate that the applicant family can reasonably be expected **not to**:
    - (1) Interfere with other residents in such a manner as to diminish their peaceful enjoyment of the premises by adversely affecting their health, safety, or welfare; [**Required, 24 CFR § 960.205 (b)**]
    - (2) Adversely affect the physical environment or financial stability of the project; [**Required, 24 CFR § 960.205 (b)**]
    - (3) Violate the terms and conditions of the lease; [**See 24 CFR § 8.3 Definition: Qualified individual with handicaps**]
    - (4) Require services from CMHA staff that would alter the fundamental nature of CMHA's program. [**See 24 CFR § 8.3 Definition: Qualified individual with handicaps**]
  - c. CMHA will conduct a detailed interview of all applicants. Answers will be subject to third party verification. [**Required, 24 CFR §960.206 (a) &(b)**]
  - d. CMHA will complete a credit check and rental history check on all applicants.
  - e. Payment of funds owed to CMHA or any other housing authority is part of the screening evaluation. Payment of outstanding balances is an opportunity for the applicant to demonstrate an improved track record. CMHA will reject an applicant for unpaid balances owed CMHA by the applicant for any program that CMHA operates. CMHA expects these balances to be paid in full (either in a lump sum or over time) before initiating the full screening process. CMHA will not admit families who owe back balances. Payment of an outstanding balance will not guarantee selection for housing. [**See 24 CFR § 960.205 (b)(1)**]
  - f. CMHA will complete a criminal background check on all adult applicants or any member for whom criminal records are available. [**24 CFR § 960.205 (b)(3)**]

- g. CMHA may complete a home visit on applicants.<sup>13</sup> Housekeeping inspections will be used to determine whether the applicant's housekeeping would contribute to health or sanitation problems. CMHA staff completing the home visit must consider whether the conditions they observe are the result of the applicant's treatment of the unit or whether they are caused by the unit's overall substandard condition.
- (1) Housekeeping criteria shall include, but not be limited to:
    - (a) Conditions in living room, kitchen (food preparation and clean-up), bathroom, bedrooms, entrance-ways, halls, and yard (if applicable);
    - (b) Cleanliness in each room; and
    - (c) General care of appliances, fixtures, windows, doors and cabinets.
  - (2) Other CMHA lease compliance criteria will also be checked, such as:
    - (a) Evidence of destruction of property;
    - (b) Unauthorized occupants;
    - (c) Evidence of criminal activity; and
    - (d) Conditions inconsistent with application information.
  - (3) All applicants shall have at least two days' advance written notice of Home Visits.
  - (4) The purpose of the Home Visit is to obtain information to be used in determining the applicant's compliance with Applicant Screening Criteria.
- h. All applicants are required to attend and complete CMHA's Pre-Occupancy Orientation.
- i. CMHA's examination of relevant information respecting past and current habits or practices will include, but is not limited to, an assessment of:
- (1) The applicant's past performance in meeting financial obligations, especially rent and utility bills. **[Required, 24 CFR § 960.205 (b) (1)]**
  - (2) A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at present or prior residences that may adversely affect the health, safety, or welfare of other tenants or neighbors. **[Required, 24 CFR § 960.205 (b) (2)]**

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<sup>13</sup> If CMHA is unable to perform home visits on all applicants, CMHA may elect to perform home visits only on applicants who have passed the criminal background check or on applicants whose landlord references are marginal.

- (3) Any history of criminal activity on the part of any applicant family member involving crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity that would adversely affect the health, safety, or welfare of other residents or staff or cause damage to the unit or the development. **[Required, 24 CFR § 960.205 (b)(3) & the Anti-Drug Act of 1988]**
- (4) Applicants will be determined ineligible for admission if CMHA determines that there is reasonable cause to believe that the applicant and/or any family member's pattern of abuse of alcohol may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents. [Housing Opportunity Program Extension Act of 1996]. CMHA may waive this requirement if the person demonstrates to CMHA's satisfaction that the person is no longer engaging in abuse of alcohol and:
  - (a) Has successfully completed a supervised drug rehabilitation program approved by CMHA;
  - (b) Has otherwise been rehabilitated successfully (third-party verification required); or
  - (c) Is participating in a supervised drug or alcohol rehabilitation program approved by CMHA.
- (5) A record of eviction from housing or involuntary termination from residential programs (taking into account date and circumstances).
- (6) An applicant's ability and willingness to comply with the terms of CMHA's lease. **[24 CFR § 8.2 Definition: Qualified Individual with Handicaps]**
- j. An applicant's intentional misrepresentation of any information related to eligibility, award of preference for admission, housing history, allowances, family composition or rent will result in rejection. Unintentional mistakes that do not confer any advantage to the applicant will not be considered misrepresentations.
- k. Applicants must be able to demonstrate the ability and willingness to comply with the terms of CMHA's lease, either alone or with assistance that they can demonstrate they have or will have at the time of admission.<sup>14</sup> **[24 CFR § 8.2 Definition: Qualified Individual with Handicaps]** Availability of assistance is subject to verification by CMHA.
- 3. Screening applicants who claim mitigating circumstances
  - a. If negative information is received about an applicant, CMHA shall consider the time, nature, and extent of the applicant's conduct and to factors that might indicate a reasonable probability of favorable future conduct. To be factored into

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<sup>14</sup> Applicants whose landlord, financial, criminal and other references demonstrate that they are already willing and able to comply with lease terms in their existing housing will be considered to have met this criterion, whether or not they are disabled. Applicants whose housing situations make it difficult for CMHA to determine whether or not they are able and willing to comply with lease terms (e.g. because they are homeless, are living with friends or relatives, or have other non-traditional housing circumstances) will have to demonstrate ability and willingness to comply with lease terms whether or not they are disabled.



CMHA's screening assessment of the applicant, mitigating circumstances must be verifiable. **[Required, 24 CFR §960.205(d)]**

- b. Mitigating circumstances<sup>15</sup> are facts relating to the applicant's record of unsuitable rental history or behavior, which, when verified, indicate both: (1) the reason for the unsuitable rental history and/or behavior; and (2) that the reason for the unsuitable rental history and behavior is no longer in effect or is under control, **AND** applicant's prospect for lease compliance is an acceptable one, justifying admission. Mitigating circumstances would overcome or outweigh information already gathered in the screening process.

- c. If the applicant asserts that the mitigating circumstances relate to a change in disability, medical condition or course of treatment, CMHA shall have the right to refer such information to persons qualified to evaluate the evidence and verify the mitigating circumstance. CMHA shall also have the right to request further information reasonably needed to verify the mitigating circumstance, even if such information is of a medically confidential nature. Such inquiries will be limited to the information necessary to verify the mitigating circumstances or, in the case of a person with disabilities, to verify a reasonable accommodation.

- d. Examples of mitigating circumstances might include: **[Required, 24 CFR § 960.205 (d)],**

- (1) Evidence of successful rehabilitation;
- (2) Evidence of the applicant family's participation in social service or other appropriate counseling service; or
- (3) Evidence of successful and sustained modification of previous disqualifying behavior.

- e. Consideration of mitigating circumstances does not guarantee that applicant will qualify for admission. CMHA will consider such circumstances in light of:

- (1) the applicant's ability to verify the claim of mitigating circumstances and his/her prospects for improved future behavior;
- (2) the applicant's overall performance with respect to all the screening requirements; and
- (3) the nature and seriousness of any criminal activity, especially drug related criminal activity that appears in the applicant's record.

4. Qualified and Unqualified Applicants

- a. Verified information will be analyzed and a determination made with respect to:

- (1) Eligibility of the applicant as a family; **[Required, 24 CFR § 5.403]**
- (2) Eligibility of the applicant with respect to income limits for admission; **[Required, 24 CFR § 5.603]**

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<sup>15</sup> The discussion of mitigating circumstance in this paragraph is applicable to all applicants. CMHA is required by regulation to consider mitigating circumstance, see 24 CFR § 960.205 (d) (1).

- (3) Eligibility of the applicant with respect to citizenship or eligible immigration status; **[24 CFR § 5.5]**
  - (4) Unit size required for and selected by the family;
  - (5) Preference category (if any) to which the family is entitled; **[24 CFR § 5.4]** and
  - (6) Qualification of the applicant with respect to the Applicant Selection Criteria. **[Required, 24 CFR § 960.205]**
- b. Families determined to be qualified will be notified by CMHA of the approximate date of occupancy insofar as that date can be reasonably determined. **[Required, 24 CFR § 960.207(b)]** However, the date stated by CMHA is just an estimate and does not mean that applicants should necessarily expect to be housed by that date. The availability of a suitable unit to offer a family is contingent upon many factors CMHA does not control, such as turnover rates, and market demands as they affect bedroom sizes and project location. **[Required, 24 CFR § 960.207 (b)]**
- c. Applicants determined unqualified for admission will be promptly notified. These applicants will receive a Notice of Rejection from CMHA, stating the basis for such determination. CMHA shall provide such applicants with an opportunity for informal review of the determination as described in **Procedure for Informal Hearing for Rejected Applicants**. The informal hearing for applicants should not be confused with the resident grievance process. Applicants are not entitled to use of the resident grievance process. **[Required, 24 CFR § 960.207(a)]**
- d. Applicants known to have a disability that are determined eligible but fail to meet the Applicant Selection Criteria, will be offered an opportunity for a second meeting to have their cases examined to determine whether mitigating circumstances or reasonable accommodations will make it possible for them to be housed in accordance with the Screening Procedures.

#### A. Occupancy Guidelines

1. Units shall be occupied by families of the appropriate size. This policy maintains the usefulness of the units, while preserving them both from excessive wear and tear and under-utilization. It is also fully compliant with HUD rules related to Occupancy Standards.

##### Minimum and Maximum-Number-of-Persons-Per Unit Standard

<u>Number of Bedrooms</u>	<u>Min Persons/Unit</u>	<u>Max Persons/Unit</u>
	<u>(Largest Unit Size)</u>	<u>(Smallest Unit Size)</u>

0BR	1	1
1BR	1	2
2BR	2	4
3BR	3	6
4BR	4	8
5BR	5	10

The following principles govern the size of unit for which a family will qualify. Generally, two people are expected to share each bedroom, except that units will be so assigned that:

- a. It will not be necessary for persons of different generations or opposite sex, other than husband and wife, to occupy the same bedroom, although they may do so at the request of the family.
  - b. Exceptions to the largest permissible unit size may be made in case of reasonable accommodations for a person with disabilities.
  - c. Two children of the opposite sex will not be required to share a bedroom, although they may do so at the request of the family.
  - d. An unborn child may or may not be counted as a person in determining unit size.
  - e. Foster children will be included in determining unit size only if they will be in the unit for more than six months.
  - f. In determining unit size, CMHA will take into account a child who is temporarily away from the home because the child has been placed in foster care, kinship care, or is away at school, however family members not listed on the lease, such as those in the military, shall not be counted in determining unit size.
  - g. A single head of household parent shall not be required to share a bedroom with his/her child, although they may do so at the request of the family.
  - h. A live-in attendant may be assigned a bedroom. Single elderly or disabled residents with live-in attendants will be assigned one or two bedroom units.
  - i. In the Senior-designated and Mixed Population high rise buildings, vacant 1 BR units shall be leased, in waiting list order, before vacant efficiency units.
2. The Local Housing Code of two persons per bedroom will be used as the standard for the smallest unit a family may be offered. Individual housing units with very small or very large bedrooms or other specific situations that inhibit or encourage lower or higher levels of occupancy may be permitted to establish lower or higher occupancy levels. CMHA will consider the size of the unit and the size of the bedrooms as well as the number of bedrooms. CMHA must make the case that such occupancy levels will not have the effect of discriminating on the basis of familial status.
  3. The largest unit size that a family may be offered would provide no more than one bedroom per family member, taking into account family size and composition.
  4. When a general occupancy family applies for housing, and each year when the waiting list is updated, some families will qualify for more than one unit size. Both at application and at update,

the applicant must choose the waiting sublist for one of the unit sizes for which they qualify. Factors that might affect the family's decision could include cultural standards, length of time the family would have to wait for smaller vs. larger units, and the age, relationship and gender of family members. Based on the family's choice, they will be placed on the appropriate waiting sublist by unit size. The family (not CMHA) decides which size of unit they wish to be listed for (corresponding to the smallest, largest or a unit in between, for which they qualify). A family that chooses to occupy a smaller size unit must agree not to request a transfer until their family size changes.

5. When a family is actually offered a unit, if they no longer qualify for the unit size, they will be moved to the appropriate sublist, retaining their preferences and date and time of application. This may mean that they may have to wait longer for a unit offer.
6. **IMPORTANT:** The unit size standards shall be discussed with each applicant family that qualifies for more than one unit size. Families will also be informed about the status and movement of the various waiting lists and sublists maintained by CMHA. Families shall be asked to declare in writing the waiting list on which they wish to be placed. If a family opts for a smaller unit size than would normally be assigned under the largest unit size standard (because, the family will be required to sign a statement agreeing to occupy the unit assigned at their request until their family size or circumstances change. CMHA shall change the family's sublist at any time while the family is on the waiting list at the family's request.

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

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

##### **1. Community-Wide Waiting List**

It is CMHA's policy that each applicant shall be assigned his/her appropriate place on site-based waiting list selected by the applicant in sequence based upon:

- a. type and size of unit needed and selected by the family (e.g. general occupancy building, accessible or non-accessible unit, number of bedrooms);
  - b. applicant preference or priority, if any; and
  - c. date and time the application is received.
2. CMHA will maintain its waiting list in the form that records the type and size of unit needed, each applicant's priority/preference status, the date and time of application, and the race and ethnicity of the family head.
  3. Under CMHA's Site-based Waiting Lists, the application for such lists shall be a part of the CMHA's Annual Plan. All current applicants for the developments selected for Site-based Waiting Lists will be given an opportunity to list up to three developments where they would accept a unit offer or to opt for the "first available" unit offer. Thereafter, new applicants would have the same opportunity to select up to three developments or "first available" unit offer. "Once the initial site based lists are established, all applicants will be informed of the length of each list and have an opportunity when their application is updated to change their site selection.

## **B. Unit Offers to Applicants**

1. The plan for assignment of dwelling units to assure equal opportunity and nondiscrimination on grounds of race, color, sex, religion, national origin, disability or familial status is PLAN "A" with modifications as described below. Under Plan A, the first qualified applicant in sequence on the waiting list is made one offer of a unit of appropriate size and type at a site he/she has selected. The applicant must accept the vacancy offered or be dropped from the waiting list. Applicants who are removed from the waiting list because they refuse unit offers without good cause may not reapply for housing for 12 months.
2. CMHA will first match the characteristics of the unit available to the highest ranking applicant for a unit of that size, type and special features (if any), taking into account any limitations on admission because of designated housing (if applicable). Preferences, if any, will then be used to determine the order of selection from the waiting list. If two applicants need the same type and size of unit and have the same preference status, the applicant with the earlier date and time of application will receive the earliest offer.
3. Further, in the selection of a family for a unit with accessible features, CMHA will give preference to families that include a person with disabilities who can benefit from the unit features.
4. In selecting applicants for offers of units, CMHA will take into account any local preferences that may be properly adopted following the statutorily required public hearing. In determining what local preferences to adopt, CMHA must consider the requirements of the Quality Housing and Personal Responsibility Act of 1998 and local housing needs and conditions.
5. The local preferences, if any, described above will be a factor in most admissions, although there may be instances (e.g. a unit with accessible features is ready and no applicant in the targeted preference group needs the features) when CMHA will make an offer to an applicant who does not qualify for a local preference. Certain types of transfers will also be processed with new admissions. See Section F. for the ratio of transfers to new admissions.
6. The applicant must accept the vacancy offered within 3 working days of the date the offer is communicated (by phone, mail, or the method of communication designated by the applicant) or be removed from the waiting list.
7. If more than one unit of the appropriate size and type is available, the first unit to be offered will be the unit that is or will be ready for move-in first. "Ready for move-in" means the unit has no Housing Quality Standard deficiencies and is broom clean.

## **C. Due Process Rights for Applicants**

To ensure that filling vacant units occurs in a timely manner, it is necessary to have a waiting list that is complete and accurate. While it is the responsibility of each applicant to keep CMHA apprised of any changes in his/her address, phone number, family income or other family circumstances, no applicant on the waiting list, now or in the future, shall be removed from the waiting list except when one of the following situations occurs:

1. The applicant receives and accepts an offer of housing;
2. The applicant requests that his/her name be removed from the waiting list;

3. The applicant is rejected, either because he/she is ineligible for public housing at the time of certification, or because he/she fails to meet the applicant selection criteria<sup>16</sup>; or
4. The application is withdrawn because CMHA attempted to contact the applicant for an annual waiting list update, to schedule a meeting or interview, to offer or show a unit, or for some other reason, and was unable to contact the applicant. In attempting to contact an applicant, the following two methods shall be undertaken before an application may be withdrawn:
  - a. The applicant will be sent a letter by first class mail to the applicant's last known address, asking the applicant to contact CMHA<sup>17</sup> either by returning the update postcard or in person;
  - b. If an applicant contacts CMHA, as required, within any of the deadlines stated above, he/she shall be reinstated at the former waiting list position.
  - c. When CMHA is unable to contact an applicant by first class mail to schedule a meeting, or interview or to make an offer, CMHA shall suspend processing of that application until the applicant is either withdrawn (no contact by the applicant) or reinstated (contact by the applicant within the stated deadlines). While an application is suspended, applicants next in sequence will be processed.
5. Persons who fail to respond to CMHA attempts to contact them because of situations related to a disability shall be entitled to reasonable accommodation, provided that the situation can be verified to be related to a disability. In such circumstances CMHA shall reinstate these individuals to their former waiting list positions.
6. Families whose applications are withdrawn or rejected as described above can only be placed on the waiting list again by applying for housing at a time that the waiting list is open. Families whose applications were withdrawn for refusing unit offers without good cause may not reapply for 12 months. In these cases, they will have a new date and time of application.

#### **D. Good Cause for Applicant Refusal to Lease**

If an applicant is willing to accept the unit offered but is unable to move at the time of the offer and presents to the satisfaction of CMHA, clear evidence ("good cause") that acceptance of the offer of a suitable vacancy will result in undue hardship not related to considerations of race, color, sex, religion or national origin, the applicant will not be dropped to the bottom of the list.

1. Examples of "good cause" for refusal of an offer of housing include, but are not limited to:
  - a. The unit is not ready for move-in at the time of the offer of housing. "Ready for move-in" means the unit has no Housing Quality Standard deficiencies.
  - b. Inaccessibility to source of employment, education, or job training, children's day care, or educational program for children with disabilities<sup>18</sup>, so that

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<sup>16</sup> All rejected applicants are entitled to a complete explanation of the reason for their rejection and an informal hearing at which they may present reasons why they should not be rejected. See the Procedure on Informal Hearings for Rejected Applicants.

<sup>17</sup> Except that CMHA shall contact persons with disabilities according to the methods such individuals have previously designated. Such methods of contact could include verbal or in-person contact or contacting relatives, friends or advocates rather than the person with disabilities.

accepting the unit offer would require the adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities;

- c. The family demonstrates to CMHA's satisfaction that accepting the offer will place a family member's life, health or safety in jeopardy. The family must offer specific and compelling documentation such as restraining orders, other court orders, or risk assessments related to witness protection from a law enforcement agency. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption;
  - d. A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (each as listed on final application) or live-in aide necessary to the care of the principal household member;
  - e. The unit is inappropriate for the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30 day notice to move;
  - f. An elderly or disabled family makes the decision not to occupy or accept occupancy in designated housing; or
  - g. The applicant is willing to move to the unit offered, but is unable to move in a timely fashion, because the applicant must give notice to a current landlord.
- 2. The applicant must be able to document that the hardship claimed is good cause for refusing an offer of housing. Where good cause is verified, the refusal of the offer shall not require that the applicant be dropped to the bottom of the waiting list or otherwise affect the family's position on the waiting list. (In effect, the family's application will remain at the top of the waiting list until the family receives an offer for which they have no good cause refusal.)
  - 3. CMHA will maintain a record of units offered, including location, date, and circumstances of each offer, and each acceptance or refusal, including the reason for the refusal.

#### **E. Dwelling Units With Accessible/Adaptable Features**

- 1. Before offering a vacant accessible unit to a non-disabled applicant, CMHA will offer such units:
  - a. First, to a current occupant of another unit of the same development, or other public housing developments under CMHA's control, having a disability that requires the special features of the vacant unit (in effect, a transfer of the occupant with disabilities from a non-adapted unit to the vacant accessible/adapted unit).
  - b. Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.
- 2. When offering an accessible/adaptable unit to a non-disabled applicant, CMHA will require the applicant to sign an agreement to move to an available non-accessible unit within 30

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<sup>18</sup>

If the applicant has a child participating in such a program.

days when either a current resident or an applicant with a disability needs the unit. This requirement is also reflected in the lease agreement signed with the applicant.

**F. Leasing and Occupancy of Dwelling Units**

Applications for admission and transfer will be processed centrally. Initial intake, waiting list management, screening, and assigning of housing (including transfers) will be made from the central office. Offers may be made in person, in writing or by phone from the central office or the development.

**G. Transfers**

CMHA has five possible types of transfers: Emergency, Administrative - Category 1, Category 2 and Category 3, and Incentive<sup>19</sup> transfers. The definition of each type of transfer is found in the Transfer section of the Admissions and Occupancy Policy.

1. Emergency and Category 1 and 2 administrative transfers and Incentive transfers will take priority over admissions. Category 3 administrative transfers will be processed at the rate of four admissions to each transfer. The specific definitions of each type of transfer are covered in Section V, Transfers, below.
2. Transfers will be made within the location where the family currently resides. If an appropriate size or type of unit is not available in the family's current location, the family will be permitted to choose a location with a vacant, ready unit of the right size and type.
3. Tenants on the transfer list may refuse transfer offers for the "good cause" reasons cited in Section C above without losing their position on the transfer list.
4. Tenants who refuse a final transfer offer without good cause may be removed from the transfer list and tenants whose transfers are mandatory are subject to lease termination.
5. Tenants are entitled to use the CMHA Grievance Procedure if they are refused the right to transfer or if CMHA is requiring them to transfer and they do not want to do so.

## **Section IV - Leasing Policies and Occupancy of Dwelling Units**

**A. General Leasing Policy**

1. All units must be occupied pursuant to a lease that complies with HUD's regulations [Required, 24 CFR § 966].
2. The lease shall be signed by the head and spouse of the household accepted as a resident family and by the Executive Director or other authorized representative of CMHA, prior to actual admission. [24 CFR § 966.4 (p)]
3. Changes in family composition, income, or status between the time of the interview with the applicant and the showing of the unit or between annual reexaminations will be processed centrally. Managers shall work with CMHA's leasing office to forward necessary information and coordinate this activity with the applicant or resident family.

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<sup>19</sup> If the CMHA has no units appropriate for Incentive Transfers, but such units are developed or acquired in the future, this policy will be activated by Board resolution.



4. If a resident transfers from one CMHA unit to another, a new lease will be executed for the dwelling into which the family moves. **[24 CFR § 966.4 (c)(3)]**
5. If at any time during the life of the lease agreement, a change in the resident's status results in the need for changing or amending any provision of the lease, either:
  - a. A new lease agreement will be executed, or
  - b. A Notice of Rent Determination will be executed, or

- c. An appropriate rider will be prepared and made a part of the existing lease, or appropriate insertions made within the lease. All copies of such riders or insertions are to be dated and signed by the Resident and by the Executive Director or other authorized representative of the Housing Authority. **[24 CFR § 966.4 (o)]**
6. Residents must advise CMHA if they will be absent from the unit for more than 30 days. Residents are required to notify the manager and make arrangement to secure the unit and provide a means for CMHA to contact the resident in the event of an emergency. Failure to advise CMHA of an extended absence is grounds for termination of the lease.

**A. Showing Units Prior to Leasing**

1. When offering units, CMHA will provide the applicant with a brief property description and other information to help orient the applicant to the neighborhood and location in the property. Staff making offers will be familiar with CMHA's housing sites. If the offer of a unit is preliminarily accepted by the applicant, the management staff of the property will be advised of the offer and will contact the applicant to set up a date to show the unit.
2. Once the unit is shown and the applicant accepts the unit, the manager will execute a lease. If the applicant refuses the unit, a signed reason for refusal should be obtained from the applicant if possible. The form is then sent to central office for a "good cause" determination. **[24 CFR § 966.4 (i)]**
3. Managers will only lease units of the appropriate size. Families may choose to lease units of sizes between the largest and smallest unit for which they qualify. If a family opts to lease a unit smaller than the largest unit for which they qualify, the family shall agree in writing to remain in that size unit until family size or circumstances require a larger unit. If an exception to CMHA's largest unit standard is approved for the applicant, this information will be noted on the leasing packet sent to the manager. No exceptions will be granted to the smallest unit standard, since this would result in overcrowding.

**A. Occupancy, Additions to the Household and Visitors**

1. Only those persons listed on the most recent certification form and lease shall be permitted to occupy a dwelling unit. **[24 CFR §§ 960.209 (b) and 966.4 9 (a)(2)]** Except for natural births to or adoptions by family members, any family seeking to add a new member must request approval in writing prior to the new member occupying the unit. This would include situations in which a resident is granted custody of a child or children not previously listed on the application or lease. Also included, would be situations in which a person (often a relative) came to the unit as a visitor but stayed on in the unit because the tenant needed support, for example, after a medical procedure. **[24 CFR § 966.4 (f)(3) & (c)(2)]** All persons listed on the most recent certification form and the lease must use the dwelling unit as their sole residence.
2. Following receipt of a family's request for approval to add a new person or persons to the lease, CMHA will conduct a pre-admission screening of any proposed new adult members. The results of screening shall be used to determine whether CMHA will approve admitting the new member.

3. Minors added through a formal custody award or kinship care arrangement are exempt from the pre-admission screening process, although the resident still needs prior permission from CMHA to add children other than those born to or adopted by family members.

4. Examples of situations where the addition of a family or household **member is subject to screening** are:
  - a. Resident plans to be married and files a request to add the new spouse to the lease;
  - b. Resident desires to add a new family member to the lease, employ a live-in aide, or take in a foster child(ren) which may only be done with the prior written consent of CMHA;
  - c. A unit is occupied by a remaining family member(s) under age 18 (who is not a minor with the legal capacity to execute a lease) and an adult, not a part of the original household, requests permission to take over as the head of the household; and
  - d. Resident is being considered for an Incentive Transfer.
5. Residents who fail to notify CMHA of additions to the household or who permit persons to join the household without undergoing screening are in violation of the lease. Such persons will be considered unauthorized occupants by CMHA and the entire household will be subject to eviction. **[24 CFR § 966.4 (f)(3)]**
6. Visitors are permitted in a dwelling unit, provided that they are reported to the Manager within ten days of their arrival or earlier. The family must notify CMHA of visitors who will be in the unit in excess of 14 days within a twelve-month period. Visitors who remain beyond this period shall be considered trespassers, and their presence constitutes a breach of the lease unless otherwise authorized by CMHA.
7. In accordance with the lease, roomers and lodgers shall neither be permitted to occupy a dwelling unit, nor shall they be permitted to move in with any family occupying a dwelling unit. Violation of this provision is ground for termination of the lease. **[24 CFR § 966.4 (f) (2)]**
8. Residents are prohibited from allowing a former resident of CMHA who has been evicted to occupy the unit for any period of time. Violation of this requirement is grounds for termination of the lease.
9. Family members over age 17 or minors who move from the dwelling unit to establish new households shall be removed from the lease. **[24 CFR § 966.4 (f)(3)]** The resident has the responsibility to report the move-out within 10 calendar days of its occurrence.

**A. Absences from the Unit**

1. Families must notify CMHA if they will be absent from the unit for more than 30 consecutive days.
2. If the entire family is absent from the unit for more than 90 consecutive days, the unit will be considered vacated and the lease will be terminated. To determine if the family is absent from the unit, CMHA may conduct a home visit, write letters to the family at the unit, telephone the family at the unit, interview neighbors and verify if utilities are in service.
3. If a family member leaves the unit to enter a medical facility, CMHA will seek advice from a reliable qualified source about the likelihood and timing of the family member's return. If the member will be permanently confined to a nursing home, the member will be considered permanently absent. If the family member will return in 90 days or less, the member will not be considered permanently absent.

4. If any family member is incarcerated for more than 90 consecutive days, he/she will be considered permanently absent.
5. If the family includes children that are temporarily absent due to placement in foster care, CMHA will determine when they will be returned home. If the children will be absent for 90 days or more, they will be removed from the certification and the unit size may be reduced.
6. Whenever an adult member leaves the household, the family is required to notify CMHA whether the absence is temporary or permanent. Permanent moves from the household will trigger an interim reexamination.

## **Section V - Transfer Policy**

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

1. It is CMHA's policy that transfers will be made without regard to race, color, national origin, sex, religion, or familial status. Residents can be transferred to accommodate a disability. **[Required, 24 CFR § 100.5]**
2. Residents will receive three offers of a transfer. Refusal of the final offer without good cause will result in lease termination for mandatory transfers or the removal of the household from the transfer list for voluntary transfers. The good cause standard applicable to new admissions shall apply to transfers.

### **B. Types of Transfers**

This policy sets forth several categories of transfers. 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. Emergency transfers within sites or between sites may be made to: permit repair of unit defects hazardous to life, health, or safety; alleviate verified disability problems of a life threatening nature.

**These transfers shall take priority over new admissions.**

2. Category 1 Administrative Transfers include mandatory transfers to: provide housing options to residents who are victims of hate crimes<sup>20</sup> or extreme harassment; alleviate verified disability problems of a serious (but not life-threatening) nature; permit modernization or demolition of units; or permit a family that requires a unit with accessible features to occupy such a unit.

**These transfers shall take priority over new admissions.**

Requests for these transfers will be made to the manager. The Resident shall provide the necessary documentation to substantiate the need for a such transfers. Transfers may also be initiated by CMHA (e.g. moving a person with mobility problems to a unit with accessible features).

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<sup>20</sup> Following input from Housing Opportunity Made Equal that such a transfer is appropriate.

3. Category 2 Administrative Transfers are mandatory transfers within sites or between sites to correct serious occupancy standards problems (over or under CMHA's standards) as described below.

**These transfers will take priority over new admissions.**

Category 2 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.**

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 3 transfer.

4. Category 3 Administrative Transfers are mandatory transfers within sites or between sites may be made to: correct and avoid concentration of the most economically and socially deprived families; 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 opposite sexes to have separate bedrooms).

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

5. Incentive Transfers: As described in detail below, Incentive Transfers are offered to scattered site units, on a nondiscriminatory basis to residents with good rental histories.

**These transfers take priority over new admissions, with transfers being processed at the rate of three transfers to each admission.**

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

### C. Processing Transfers

1. A centralized transfer waiting list will be administered by the Occupancy Division. Managers are responsible for submitting requests for transfer including necessary documentation, to the Occupancy Specialist Manager.
2. Transfers will be sorted into their appropriate categories by the Occupancy staff. Admissions will be made in the following order:
  - a. First: Emergency transfers, then
  - b. Category 1 Administrative Transfers,
  - c. Category 2 Administrative Transfers,
  - d. Incentive Transfers,
  - e. Applicants, and, at a rate of four applicants to every transfer,
  - f. Category 3 Administrative Transfers

Within each category, transfer applications will be sorted by the date the completed file (including any verification needed) is received from the manager.

3. Category 2 transfers to correct occupancy standards may be recommended at time of re-examination or interim redetermination. This is the only method used to determine over/under housed status.
4. Residents in a Category 2 over/under housed status will be advised in their 30 day "Notice of Result of Reexamination" that a transfer is recommended and that the family has been placed on the transfer list. Interviewers will record transfer recommendations in duplicate for each manager affected by the transfer.

5. When a head of a household, originally housed in a bedroom by him/herself, has or adopts a child, the family will not be approved for a Category 2 transfer until the child is three (3) years of age. Exceptions: spouse or partner returns to the unit, marriage takes place, or family decides to remain in the unit and the unit is large enough (using the smallest-unit standard) to accommodate the number of persons now in the household. (Other than for births or adoptions that occur during tenancy, CMHA's prior approval of additions to the household is required.)
6. Split-family transfers will be processed as Category 2 administrative transfers. Families that split into 2 "new" households may be transferred to two different units or a portion of the "old" household may be transferred to a single unit depending on family circumstances and unit availability. Options for split-family transfers will be considered in order to minimize the impact on vacant units. Such transfers will be made in a manner that best benefits CMHA.
7. Category 3 administrative transfers will be processed with new admissions using a ratio of 1 transfer for every 4 new admissions. This ratio is discretionary and will be reviewed at least annually to determine its effects on vacancy. Based on recommendations from staff, the Executive Director may authorize a change in this ratio or suspend the processing of this type of transfer.

**D. Good Record Requirement for Transfers**

1. In general, and in all cases of all resident-requested transfers, residents will be considered for transfers only if the head of household, any other family members or guests for the past three years:
  - a. have not engaged in drug-related or criminal activity that threatens the health and safety of residents and staff;
  - b. do not owe back rent or other charges, or evidence a pattern of late payment;
  - c. meet reasonable housekeeping standards and have no housekeeping lease violations for three years;
  - d. can get utilities turned on in the name of the head of household (applicable only to properties with tenant-paid utilities); and
  - e. have no other serious or repeated violations of the material terms of the lease or other good cause for lease termination as evidenced by a Notice or Lease Termination issued.
2. Exceptions to the good record requirements may be made for emergency transfers or when it is to CMHA's advantage (e.g. a single person is living alone in a three bedroom unit and does not want to move) to move forward with the transfer. The determination to make an exception to the good record requirement will be made by the central transfer administrator taking into account the recommendation by the Manager. Absent a determination of exception, the following policy applies to transfers:
  - a. If back rent is owed, the resident will not be transferred until a payment plan is established or, if prior payment plans have failed, back rent is paid in full.
  - b. A resident with housekeeping standards violations will not be transferred until he/she passes a follow-up housekeeping inspection.



## **E. Incentive Transfers**

1. Incentive transfers are offered to non-scattered site residents without regard to their race, color, national origin, religion, sex, disability or familial status, who have good rental histories, as described below, and want to move to scattered site units.
  - a. Incentive Transfers - CMHA will occupy scattered site units through incentive transfers. CMHA reserves the right to fill modernization units in a manner that has the least impact on vacant units.
  - b. Resident requests for incentive transfers should be made to their Housing Manager. Managers may also recommend a resident for an incentive transfer. For a resident to be considered for an incentive transfer, the following conditions must be met:
    - (1) Residency in a non-scattered site CMHA development for at least three years.
    - (2) No late rental payments within the previous 12 months or any legal action for non-payment of rent in the past two (2) years.
    - (3) No history of disturbances that resulted in lease violations or violence toward staff or neighbors as indicated by notices of lease violation in the applicant's file.
    - (4) No history of criminal activity, including drug-related criminal activity by family members or guests;
    - (5) No other lease violations under which CMHA has commenced legal action for lease termination;
    - (6) Good housekeeping record for the past three (3) consecutive years;
    - (7) Ability to get utilities connected in the name of head of household; and
    - (8) No history of repeated lease violations warnings.
2. Incentive transfers are Category 2 administrative transfers.
3. No exceptions will be granted to the good record requirement for incentive transfers.
4. A Manager's failure to process or recommend an Incentive Transfer is subject to the Grievance Procedure.

## **F. Cost of Transfers**

1. Residents shall bear the cost of most transfers. CMHA will pay for transfers when residents are required to move as a result of demolition or modernization of their unit.
2. If the resident transfers to another unit, and the security deposit is higher on the new unit, s/he must pay the higher security deposit (e.g., security deposit on new unit is \$300.00 and the security deposit on the old unit was \$150.00, the tenant must pay the higher \$300.00 security deposit or the difference of the \$150.00).



## **Section VI - Eligibility for Continued Occupancy, Annual Reexaminations, and Remaining Family Members**

### **A. Eligibility for Continued Occupancy**

Residents who meet the following criteria will be eligible for continued occupancy:

1. Qualify as a family as defined in Section XII of this policy. (Note: For purpose of continued occupancy, remaining family members qualify as a family so long as at least one of them has the legal capacity to execute a lease. Remaining family members can also include minors under the age of 18 with the capacity to execute a lease.)
2. Are in full compliance with the resident obligations and responsibilities as described in the dwelling lease.
3. Whose family members (excluding foster children), age 6 and older, each have Social Security numbers or have certifications on file indicating they have no Social Security number.
4. Who meet HUD standards on citizenship or immigration status or are paying a pro-rated rent. [24 CFR § 5.5]
5. Who are in compliance with CMHA's 8 hour per month community service requirements (applicable to certain adults who are neither elderly, disabled, working nor participating in qualifying educational or job training programs).

### **B. Remaining Family Members and Prior Debt**

1. As a party to the lease, remaining family members 18 years of age or older (other than the head or spouse) will be held responsible for arrearages incurred by the former head or spouse. CMHA will not hold remaining family members (other than the head or spouse) responsible for any portion of the arrearage incurred prior to the remaining member attaining age 18.
2. Remaining family members under age 18 shall not be held responsible for the rent arrearages incurred by the former head of household.

### **C. Periodic Reexamination**

1. Regular reexaminations: CMHA shall, at least once a year, re-examine the incomes of all resident families. [24 CFR § 960.209 (a)]
2. Special Reexaminations: When it is not possible to estimate projected family income with any degree of accuracy at the time of admission or regular reexamination, a temporary determination will be made with respect to income and a special reexamination will be scheduled every 60 days until a reasonably accurate estimate of income can be made. The resident will be notified in advance as to the date for the special reexamination(s).
3. Zero Income Families: Unless the family has income that is excluded for rent computation, families reporting zero income will have their circumstances examined every 60 days until they have a stable income. Persons claiming zero income will also be asked to complete a family expense form. The form will ask residents to estimate how much they spend on: telephone, cable TV, food, clothing, transportation, health care, child care, debts, household items, etc. Residents will then be asked how they pay for these items.

4. Families Paying Flat Rents: Families paying flat rents shall have their incomes re-examined only every three years. These families shall still be subject to an annual recertification process to review Community Service compliance and appropriateness of unit size.
5. Reexamination Procedures
  - a. At the time of reexamination, all adults in the household will be required to sign an application for continued occupancy and other forms required by HUD.
  - b. Employment, income, allowances, Social Security numbers, and such other data as is deemed necessary will be verified, and all verified findings will be documented and filed in the resident's folder [24 CFR § 960.206]
  - c. Verified information will be analyzed and a determination made with respect to:
    - (1) Eligibility of the resident as a family or as the remaining member of a family;
    - (2) Unit size required for the family (using the Occupancy Guidelines); and
    - (3) Rent the family should pay.
  - d. Residents with a history of employment whose regular reexamination takes place at a time that they are not employed will have income anticipated based on their past and anticipated employment. Residents with seasonal or part-time employment of a cyclical nature will be asked for third party documentation of the circumstances of their employment including start and ending dates.
  - e. Income shall be computed in accordance with the definitions and procedures set forth in Federal regulations and this policy. [24 CFR § 5]
  - f. Families failing to respond to the initial reexamination appointment will be issued a final appointment within the same month. Failure to respond to the final request will result in an increase in rent of \$100.00 per month and the family being sent a notice of lease violation and referred to the Housing Manager for failure to comply with the terms and conditions of occupancy required by the lease. Failure to comply will result in termination of the lease. [24 CFR § 966.4 (c)(2)]
6. Action Following Reexamination
  - a. If there is any change in rent, the lease will be amended, or a new lease will be executed, or a Notice of Rent Determination will be issued. [24 CFR § 966.4 ( c ) & (o)]
  - b. If any change in the unit size is required, the resident will be placed on a transfer list in accordance with the transfer criteria described above in this policy and moved to an appropriate unit when one becomes available. [24 CFR § 966.4 (c)(3)]

## **Section VII - Interim Rent Adjustments: Fixed Rent System**

**A. Rent Adjustments**

1. **Residents are required to report all changes in family composition or income** to the housing manager within 14 business days of the occurrence, using the voice mail box specifically set up for such reporting, or reporting in writing to the Management Office. Failure to report within the 14 business days may result in a retroactive rent increase, but not a retroactive credit or rent reduction. In order to qualify for a rent reduction for the following month, residents must report income decreases promptly. **Residents are also required to report interim increases in income if they have been granted interim rent reductions.**
2. CMHA wishes to encourage families to improve their economic circumstances, so most changes in family income between reexaminations will not result in a rent change. CMHA will process interim changes in rent in accordance with the chart below:

<u>INCOME CHANGE</u>	<u>CMHA ACTION</u>
(a) Decrease in income for any reason, <u>except</u> for decrease that lasts less than 30 days <sup>21</sup> . <b>[24 CFR § 913.107]</b> Increase in income following CMHA granting of interim rent decrease.	• CMHA will process an interim reduction in rent if the income decrease will last more than 30 days. CMHA will process an interim increase for income increases that follow interim rent reductions.
(b) Increase in earned income from the employment of a current household member.	• CMHA will defer the increase to the next regular reexamination.
(c) Increase in unearned income (e.g. COLA adjustment for social security).	• CMHA will defer the increase to the next regular reexamination.
(d) Increase in income because a person with income (from any source) joins the household.	• CMHA will increase rent on the first day of the second month.
(e) Resident, at their annual or interim reexamination misrepresents the facts upon which the rent is based so that the rent the resident is paying is less than the rent that s/he should have been charged.	• CMHA will increase rent retroactive to the first of the month in which the rent would have increased. Residents will be required to pay the additional rent, and the lease will be terminated. <b>The recalculation of rent is not to be interpreted as CMHA's approval of an unauthorized person residing in the unit.</b>
(f) Expiration of any mandated exclusion(s) period (Federal and/or CMHA).	• CMHA will increase rent either prospectively or retroactively to the date of the expiration of the exclusion.

3. Complete verification of the circumstances applicable to rent adjustments must be documented and approved by the Executive Director or his/her designee. **[24 CFR § 960.206]**
4. CMHA will process interim adjustments in rent in accordance with the following policy:

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<sup>21</sup> Decreases in income resulting from welfare fraud or from TANF cuts for failure to participate in an economic self-sufficiency program or comply with work activities requirement are not eligible for rent reductions.

- a. When a decrease in income is reported, and CMHA receives confirmation that the decrease will last less than 30 days, an interim adjustment will not be processed.
  - b. Residents reporting decreases in income that are expected to last more than 30 days will have an interim adjustment processed.
5. Residents granted a reduction in rent under these provisions must report subsequent increases in income, after which their rent will be readjusted upward to reflect the new income.

**B. Effective Date of Adjustments**

Residents will be notified in writing of any rent adjustment and such notice will state the effective date of the adjustment.

1. Rent decreases go into effect the first of the month following the reported change. Income decreases reported and verified before the tenant accounting cut-off date will be effective the first of the following month. Income decreases reported or verified after the tenant accounting cut-off date will be effective the first of the second month with a credit retroactive to the first month.
2. Rent increases (except those due to misrepresentation) require 30 days notice and become effective the first day of the second month following timely reporting.

**C. Failure to Report Accurate Information**

If it is found the resident has misrepresented or failed to report to Management the facts upon which his/her rent is based so that the rent being paid is less than what should have been charged, then the increase in rent will be made retroactive. Failure to report accurate information is also grounds for initiating eviction proceedings in accordance with CMHA's dwelling lease. [24 CFR § 966.4 (c)(2)]

## **Section VIII - Family Debts to CMHA**

This section describes CMHA's policies to recover money underpaid by families. It describes the methods that will be used to collect money and the guidelines for different types of debts. It is CMHA's policy to meet the informational needs of families and to communicate the program rules to avoid family debts. Before a debt is assessed against a family, the file must contain documentation to support CMHA's claim that the debt is owed. The file must contain documentation of the method of calculation, in a clear format for review by the family or other interested parties.

**A. Collection Methods**

When a family owes money to CMHA, CMHA will make every effort to collect it using a variety of collection tools, including, but not limited to:

1. Request for lump sum payment;
2. Civil suits;
3. Repayment agreements;

4. Collection agencies;
5. Credit bureaus;
6. Income tax set-off programs

**B. Repayment Agreement for Families**

1. A Repayment Agreement as used in this Plan is a document entered into between CMHA and a person who owes a debt to CMHA. It is similar to a Promissory Note, but contains more details regarding the nature of the debt, the terms of repayment, any special provisions of the agreement, and the remedies available to CMHA upon default of the agreement. The Repayment agreement must be signed by the head of household and/or spouse.
2. CMHA may enter into a Repayment Agreement with a person only if they are able to make an initial payment of 25% of the total outstanding debt and pay the remainder in a maximum of six equal monthly payments. Only CMHA's Director of Housing Management and Executive Director may make exceptions to this provision.
3. CMHA may not enter into a Repayment agreement if CMHA determines that the family has committed fraud.
3. If the family has a Repayment Agreement in place and incurs an additional debt to CMHA, CMHA will enter into more than one Repayment Agreement at a time with the same family. However, CMHA will not enter into more than two Repayment Agreements at a time per family.

**C. Late Payments**

1. A payment will be considered to be late if not received on or before the seventh calendar day of the month;
2. If the family's repayment agreement is in arrears (late), CMHA will:
  - a. Require the family to pay the balance in full within 30 days;
  - b. Terminate the family's tenancy;
  - c. Pursue civil collection of the balance due.
3. If the family requests a transfer to another unit and has a repayment agreement in place and the repayment agreement has not been in arrears for the previous three months, the family will be permitted to move.

**D. Debts Due to Fraud/Non-Reporting of Information**

HUD's definition of program fraud and abuse is a single act or pattern of actions that constitutes false statement, omission, or concealment of a substantive fact, made with intent to deceive or mislead.

1. Families who owe money to CMHA due to the family's failure to report increases in income will be required to repay in accordance with the guidelines in this Section.
2. Families who owe money to CMHA due to program fraud will be required to repay the amount in full in 30 days. If the full amount is paid within this time period, and the family is still eligible, CMHA may continue assistance to the family.

4. If a family owes an amount that equals or exceeds \$2,000 as a result of program fraud, the tenant will be evicted and the case will be referred to the Inspector General. When appropriate, CMHA will refer the case for criminal prosecution.

**E. Program Integrity Procedure**

CMHA's Program Integrity Procedure will be followed in the collection of debts and addressing program fraud and abuse.



## **Section IX - Lease Termination Policies**

### **A. General Policy: Lease Termination**

It is CMHA's policy that no resident's lease shall be terminated except in compliance with applicable HUD regulations [24 CFR § 966.4 (1)(2)] and the lease terms.

### **B. Notice Requirements**

1. No resident shall be given a Notice of Lease Termination without being told by CMHA in writing the reason for the termination. The resident must also be informed of his/her right to request a hearing in accordance with the Grievance Procedure, and be given the opportunity to make such a reply as he/she may wish.

Certain actions do not qualify for the Grievance Procedure, specifically: any termination in connection with criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or CMHA employees; and any drug-related criminal activity. [24 CFR § 966.4 (1)(3)]

2. Notices of lease termination shall be served by first class mail. Notices to Leave Premises shall be served personally, or placed under the apartment door.

### **C. Recordkeeping Requirements**

A written record of every termination and/or eviction shall be maintained by CMHA, and shall contain the following information:

1. Name of resident, race and ethnicity, number and identification of unit occupied;
2. Date of the Notice of Lease Termination and any other state or local notices required, which may be on the same form and run concurrently;
3. Specific reason(s) for the Notice(s), with section of the lease violated, and other facts pertinent to the issuing of the Notice(s) described in detail;
4. Date and method of notifying resident.

## **Section X - Utilities**

In some CMHA developments, utilities are in the residents' name. In these properties, CMHA pays an amount for utilities directly to the utility company that equals the Utility Allowance developed by CMHA in consultation with an energy consultant and the utility supplier and reviewed by HUD. [24 CFR § 965 & 966.4 (b)(2)]

### **A. Resident-Paid Utilities**

The following requirements apply to residents living in or applicants being admitted to properties with resident-paid utilities:

1. In properties with resident-paid utilities, each resident will receive the benefit of a monthly utility allowance that reflects a reasonable amount of utilities for the specific size and type of unit

occupied. The amount of the utility allowance will be paid to the utility company by CMHA each month.

2. When the supplier of utilities offers a "Budget" or level payment plan, residents are encouraged to pay his/her bills according to this plan. This protects the resident from large seasonal fluctuations in utility bills and ensures adequate heat in the winter.
3. When a resident makes application for utility service in his/her own name, he or she **shall** sign a third-party notification agreement so that CMHA will be notified if the resident fails to pay the utility bill.
4. If an applicant is unable to get utilities connected because of a previous balance owed the utility company at a prior address, applicant will not be admitted to a tenant-paid utility property.
5. Paying the utility bill is the resident's obligation under the Authority's lease. Failure to pay utilities is grounds for eviction.

**B. Excess Utility Charges**

1. Residents in units where CMHA pays the utilities may be charged for excess utilities in accordance with the lease and maintenance Charge Schedule.
2. Residents with disabilities may be entitled to higher than normal utility allowances or may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability.

## **Section XI - Ceiling Rents/Flat Rents**

**A. Intent and Purpose**

Ceiling rents are intended to provide an incentive to remain in public housing to families whose incomes have increased to the point that an income-based rent (Total Tenant Payment as established in **24 CFR 5.613**) is unreasonable for the housing being provided. Use of ceiling rent by CMHA is optional<sup>22</sup>. (See **PIH Notice 96-5**)

**B. Establishing Ceiling Rents**

1. CMHA has established ceiling rents for all dwelling units inventory-wide. Ceiling rents for a class of units are based on the unit type, size, location or other characteristic that is unit-based. Classification of ceiling rent units will not be resident based, that is, applicable to particular families because of their personal circumstances. Rather, Ceiling Rents will be based on the characteristics of the dwelling units occupied.
2. CMHA retains the right to revoke or raise ceiling rents at any time after giving reasonable notice to the affected tenants.

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<sup>22</sup> CMHA has adopted ceiling rents in the manner approved by HUD.

**C. Calculating Ceiling Rents**

CMHA will follow the procedures established by HUD. CMHA will determine the minimum ceiling rents that can be charged for a unit. Ceiling rents are based on rent equivalent to the market rents of comparable units in the neighborhood of the development; but never less than 75% of the average operating cost for units at the development.

**D. What the Resident Pays**

Tenants in units where ceiling rents are in effect shall pay the lower of the ceiling rent as established in X.D. above, or the income-based rent. (Total Tenant Payment, as established in **24 CFR 5.613.**)

**E. Ceiling Rent Adjustments**

The minimum ceiling rent as calculated by CMHA will be adjusted annually to reflect operating expenses as reported on the Statement of Operating Receipts and Expenditures as of the end of the most recent fiscal year.

**F. Flat Rents**

Flat rents are required by the Quality Housing and Work Responsibility Act of 1998. Unlike Ceiling rents, which may be developed using several approaches and may not be less than the average cost to operate a unit, Flat Rents are market-based rents. Accordingly, they will vary by unit size and type and also by development location. All residents will be offered the choice of paying an income-based rent or the Flat rent.

**G. Recertification of Families on Flat Rents**

Families paying flat rents are required to recertify income only every three years, rather than annually, although they are still required to participate in an Annual Reexamination in order to ensure that unit size is still appropriate and Community Service requirements are met.

## **Section XI - Definitions and Procedures to be Used in Determining Income & Rent**

**A. Annual Income (24 CFR 5.609)**

Annual income is the anticipated total income from all sources, including net income derived from assets, received by the family head and spouse (even if temporarily absent) and by each additional family member including all net income from assets for the 12-month period following the effective date of initial determination or reexamination of income, exclusive of income that is temporary, non-recurring, or sporadic as defined below, or is specifically excluded from income by other federal statute. Annual income includes but is not limited to:

1. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;

2. The net income from operation of a business or profession, including any withdrawal of cash or assets from the operation of the business. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining the net income from a business. An allowance for the straight line depreciation of assets used in a business or profession may be deducted as provided in IRS regulations. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the business;
3. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for the straight line depreciation of real or personal property is permitted. Withdrawals of cash or assets will not be consider income when used to reimburse the family for cash or assets invested in the property;  
  
If the Family has Net Family Assets in excess of \$5,000, Annual Income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook savings rate as determined by HUD;
4. The full amount of periodic payments or periodic payments received as a lump sum from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts received by or on behalf of any family member. [See B. 14. below for treatment of delayed or deferred periodic payment of social security or supplemental security income benefits.];
5. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay (But see paragraph B. 3. below concerning treatment of lump-sum additions as Family assets.);
6. All welfare assistance payments (Temporary Assistance to Needy Families, General Assistance) received by or on behalf of any family member;
7. Periodic and determinable allowances, such as alimony and child support payments, and regular cash contributions or gifts received from agencies or persons not residing in the dwelling made to or on behalf of family members; and
8. All regular pay, special pay, and allowances of a family member in the Armed Forces. (See paragraph B. 7. below concerning pay for exposure to hostile fire.)

**B. Items not included in Annual Income [24 CFR § 5.609] (Exclusions)**

Annual Income does not include the following:

1. Earned income of minors;
2. Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the resident family, who are unable to live alone);
3. Lump sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance, and worker's compensation), capital gains, one-time lottery winnings, and settlement for personal property losses (but see paragraphs 4 and 5 above if the payments are or will be periodic in nature);  
  
[See paragraph 14. below for treatment of delayed or deferred periodic payments of social security or supplemental security income benefits.]

4. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
5. Income of a live-in aide, provided the person meets the definition of a live-in aide (See Section 12 of these policies);
6. The full amount of student financial assistance paid directly to the student or the educational institution; (**FR Vol. 60, #65/ 5 April 1995**)
7. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
8. Certain amounts received that are related to participation in the following programs:
  - a. Amounts received under HUD funded training programs (e.g. Step-up program: excludes stipends, wages, transportation payments, child care vouchers, etc. for the duration of the training);
  - b. Amounts received by a person with disabilities that are disregarded for a limited time for purposes of Supplemental Security Income and benefits that are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
  - c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) to allow participation in a specific program;
  - d. A resident services stipend. A resident services stipend is a modest amount (not to exceed \$200/month) received by a public housing resident for performing a service for CMHA, on a part-time basis, that enhances the quality of life in public housing. Such services may include but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time; and
  - e. Incremental earnings and/or benefits resulting to any family member from participation in qualifying state or local employment training program (including training programs not affiliated with the local government), and training of family members as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance by the CMHA;
9. Temporary, non-recurring, or sporadic income (including gifts);
10. Reparation payments paid by foreign governments pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
11. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of the household and spouse);
12. Adoption assistance payments in excess of \$480 per adopted child;
13. The incremental earnings and benefits to any resident 1) whose annual income increases due to employment of a family member who was unemployed for one or more years previous to employment; or 2) whose annual income increases as the result of increased earnings by a family member during participation in any economic self sufficiency or other job training program; or 3) whose annual income increases due to new employment or increased earnings of a family member

during or within six months of receiving state-funded assistance, benefits or services, **will not be increased during the exclusion period**. For purposes of this paragraph, the following definitions apply:<sup>23</sup>

- a. State-funded assistance, benefits or services means any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the PHA in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance – provided that the total amount over a six-month period is at least \$500.
  - b. During the 12-month period beginning when the member is first employed or the family first experiences an increase in income the PHA must exclude from Annual Income any increase in income as a result of employment. For the 12 months following the exclusion period, 50% of the income increase shall be excluded.
  - c. Regardless of how long it takes a resident to work for 12 months (to qualify for the first exclusion) or the second 12 months (to qualify for the second exclusion), the maximum period for the disallowance (exclusion) is 48 months.
  - d. The disallowance of increased income under this section is only applicable to current residents and will not apply to applicants who have begun working prior to admission.
14. Deferred periodic payments of supplemental security income and social security benefits that are received in a lump sum payment;
  15. Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit;
  16. Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home;
  17. Amounts specifically excluded by any other Federal Statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the United States Housing Act of 1937. (A notice will be published by HUD in the Federal Register identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary.)

The following is a list of benefits excluded by other Federal Statute:

- a. The value of the allotment provided to an eligible household for coupons under the Food Stamp Act of 1977 [**7 USC 2017 (h)**];

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<sup>23</sup> When regulations are issued that implement the 1998 Housing Act, the period for the disallowance will be reduced to 12 months. Further, when implementing the increased rent, the increase shall be phased in over a two year period. Only certain families and only certain training programs will qualify for the exclusion: families whose income increases due to employment of a member previously unemployed for one or more years, whose earned income increases while participating in any family self-sufficiency program or other job training program or who is or was in the past 6 months assisted under the Temporary Assistance to Needy Families program;

- b. Payments to volunteers under the Domestic Volunteer Service Act of 1973 [**42 USC 5044 (g), 5088**]; Examples of programs under this Act include but are not limited to:
- (1) the Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Senior Companion Program (SCP), and the Older American Committee Service Program;
  - (2) National Volunteer Antipoverty Programs such as VISTA, Peace Corps, Service Learning Program, and Special Volunteer Programs;
  - (3) Small Business Administration Programs such as the National Volunteer Program to Assist Small Business and Promote Volunteer Service to Persons with Business Experience, Service Corps of Retired Executives (SCORE), and Active Corps of Executives (ACE).
- c. Payments received under the Alaska Native Claims Settlement Act [**43 USC.1626 (a)**];
- d. Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes [**(25 USC. 459e)**];
- e. Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program [**42 USC 8624 (f)**];
- f. Payments received under programs funded in whole or in part under the Job Training Partnership Act [**29 USC 1552 (b)**] ;
- g. Income derived from the disposition of funds of the Grand River Band of Ottawa Indians [**Pub. L. 94-540, 90 State 2503-04**];
- h. The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of Claims (**25 USC 1407-08**), or from funds held in trust for an Indian Tribe by the Secretary of Interior [**25 USC 117b, 1407**]; and
- i. Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs [**20 USC 1087 uu**].
- (1) Examples of Title IV programs include but are not limited to: Basic Educational Opportunity Grants (Pell Grants), Supplemental Opportunity Grants, State Student Incentive Grants, College Work Study, and Byrd Scholarships.
- j. Payments received from programs funded under Title V of the Older Americans Act of 1965 [**42 USC 3056 (f)**]:
- (1) Examples of programs under this act include but are not limited to: Senior Community Services Employment Program (CSEP), National Caucus Center on the Black Aged, National Urban League, Association National Pro Personas Mayores, National Council on Aging, American Association of Retired Persons, National Council on Senior Citizens, and Green Thumb.

- k. Payments received after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established in the In Re Agent Orange product liability litigation;
- l. Payments received under the Maine Indian Claims Settlement Act of 1980 (**Pub. L. 96-420, 94 Stat. 1785**);
- m. The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 USC 9858q);
- n. Earned income tax credit refund payments received on or after January 1, 1991 (**26 USC 32 (j)**).

**C. Anticipating Annual Income [24 CFR § 913.106 (d)]**

- 1. If it is not feasible to anticipate income for a 12-month period, CMHA may use the annualized income anticipated for a shorter period, subject to an Interim Adjustment at the end of the shorter period. (This method would be used for teachers who are only paid for 9 months, or for tenants receiving unemployment compensation.)
- 2. Alternatively, CMHA may average known sources of income that vary to compute an annual income. If there are bonuses or overtime that the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used.
- 3. The method CMHA will use to average income will depend on the regularity, source and type of income.

**D. Adjusted Income [24 CFR § 913.102]**

Adjusted Income (the income upon which rent is based) means Annual Income less the following deductions and exemptions:

- 1. For All Families
  - a. **Child Care Expenses** — A deduction of amounts anticipated to be paid by the family for the care of children under 13 years of age for the period for which Annual Income is computed, BUT ONLY when such care is necessary to enable a family member to be gainfully employed, to seek employment or to further his/her education and when there is no adult member capable of caring for the child(ren). Amounts deducted must be unreimbursed expenses and shall not exceed: (a) the amount of income earned by the family member released to work; or (b) an amount determined to be reasonable by CMHA when the expense is incurred to permit education or to seek employment.
  - b. **Dependent Deduction** — An exemption of \$480 for each member of the family residing in the household (other than the head of household, or spouse, Live-in Aide, foster adult or foster child) who is under eighteen years of age or who is eighteen years of age or older and disabled, handicapped, or a full-time student.
  - c. **Work-related Disability Expenses** — A deduction of unreimbursed amounts paid for attendant care or auxiliary apparatus expenses for family members with disabilities where such expenses are necessary to permit a family member(s), including the



disabled member, to be employed. In no event may the amount of the deduction exceed the employment income earned by the family member(s) freed to work.

- d. Equipment and auxiliary apparatus may include but are not limited to: wheelchairs, lifts, reading devices for the visually impaired, and equipment added to cars and vans to permit their use by the disabled family member. Also included would be the annualized cost differential between a car and the cost of a van required by the family member with disabilities.

- (1) For non-elderly families and elderly families without medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for work-related disability expense less three percent of Annual Income, provided the amount so calculated does not exceed the employment income earned.

- (2) For elderly families with medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for work-related disability expense less three percent of Annual Income (provided the amount so calculated does not exceed the employment income earned) PLUS medical expenses as defined below.

2. For Elderly and Disabled Families Only:

- e. **Medical Expense Deduction** — A deduction of unreimbursed Medical Expenses, including insurance premiums, anticipated for the period for which Annual Income is computed.

Medical expenses include but are not limited to: services of physicians and other health care professionals, services of health care facilities, health insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical bills. To be considered by CMHA for the purpose of determining a deduction from income, the expenses claimed must be verifiable.

- (1) For elderly families without handicapped expenses: The amount of the deduction shall equal total medical expenses less three percent of annual income.

- (2) For elderly families with both handicapped and medical expenses: the amount of the deduction is calculated as described in paragraph 3 (b) above.

3. Elderly/Disabled Household Exemption — An exemption of \$400 per household. See Definitions

4. Optional Deductions/Exemptions:

- a. Child support paid by a resident, up to a maximum of \$480 per household;
  - b. 20% of earned income of adult family members.

**E. Rent Computation**

1. Total Tenant Payment is the highest of:
  - a. **30% of adjusted monthly income;** or
  - b. **10% of monthly income;** but never less than the
  - c. **Minimum Rent;** and never more than the
  - d. **Ceiling Rent/ Flat Rent**
2. CMHA pays all utility bills directly to the utility supplier, so Tenant Rent equals Total Tenant Payment.
3. The Minimum Rent shall be \$25 per month, but a hardship exemption shall be granted to residents who can document that they are unable to pay the \$25 because of a long-term hardship (over 120 days). Examples under which residents would qualify for the hardship exemption to the minimum rent would include but not be limited to the following:
  - a. The family has lost eligibility for or is applying for an eligibility determination for a Federal, State or local assistance program;
  - b. The family would be evicted as result of the imposition of the minimum rent requirements;
  - c. The income of the family has decreased because of changed circumstances, including loss of employment;
  - d. A death in the family has occurred; or

If it is determined that the hardship period was temporary, the tenant shall be required to repay any minimum rent abated under this hardship provision.

## **Section XII - Definitions of Terms Used in This Statement of Policies**

1. Accessible dwelling units -- when used with respect to the design, construction or alteration of an individual dwelling unit, means that the unit is located on an accessible route and when designed, constructed, altered, or adapted can be approached, entered, and used by individuals with physical handicaps. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in **24 CFR § 8.32 & § 40** [the Uniform Federal Accessibility Standards] is “accessible” within the meaning of this paragraph.  
  
When an individual dwelling unit in an existing facility is being modified for use by a specific individual, the unit will not be deemed accessible, even though it meets the standards that address the impairment of that individual, unless it also meets the UFAS standards.
2. Accessible Facility - means all or any portion of a facility other than an individual dwelling unit used by individuals with physical handicaps. **[24 CFR § 8.21]**
3. Accessible Route - For persons with a mobility impairment, a continuous unobstructed path that complies with space and reach requirements of the Uniform Federal Accessibility Standards. For persons with hearing or vision impairments, the route need not comply with requirements specific to mobility. **[24 CFR § 8.3 & § 40.3.5]**
4. Adaptability - Ability to change certain elements in a dwelling unit to accommodate the needs of handicapped and non-handicapped persons; or ability to meet the needs of persons with different types & degrees of disability. **[24 CFR § 8.3 & § 40.3.5]**
5. Alteration - any change in a facility or its permanent fixtures or equipment. It does not include: normal maintenance or repairs, reroofing, interior decoration or changes to mechanical systems. **[24 CFR § 8.3 & § 8.23 (b)]**
6. Applicant - a person or a family that has applied for admission to housing.
7. Area of Operation - The jurisdiction of the CMHA as described in applicable State law and the CMHA’s Articles of Incorporation is all of Hamilton County, Ohio, in excess of Section 6 of Hamilton Township.
8. Assets - Assets means “cash (including checking accounts), stocks, bonds, savings, equity in real property, or the cash value of life insurance policies. Assets do not include the value of personal property such as furniture, automobiles and household effects or the value of business assets.” IMPORTANT: See the definition of Net Family Assets, for assets used to compute annual income. (See **24 CFR § 5.603** for definition of Net Family Assets)
9. Auxiliary Aids - means services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in and enjoy the benefits of programs or activities. **(24 CFR § 8.3)**
10. Care attendant - a person that regularly visits the unit of a CMHA resident to provide supportive or medical services. Care attendants are not live-in aides, since they have their own place of residence (and if requested by CMHA must demonstrate separate residence) and do not live in the public housing unit. Care attendants have no rights of tenancy.
11. Co-head of household - a household where two persons are held responsible and accountable for the family.
12. Dependent - A member of the household, other than head, spouse, sole member, foster child, or Live-in Aide, who is under 18 years of age, or 18 years of age or older and disabled, handicapped, or a full-time student. **[24 CFR § 5.603]**

13. Designated Family - means the category of family for whom CMHA elects (subject to HUD approval) to designate a project (e.g. elderly family in a project designated for elderly families) in accordance with the 1992 Housing Act. **(PL 96-120)**
14. Designated housing (or designated project) - a project(s), or portion of a project(s) designated for elderly only or for disabled families only in accordance with **PL 96-106**.
15. Disabled Family - A family whose head, spouse or sole member is a person with disabilities. (Person with disabilities is defined later in this section.) The term includes two or more persons with disabilities living together, and one or more such persons living with one or more persons including live-in aides determined to be essential to the care and well-being of the person or persons with disabilities. A disabled family may include persons with disabilities who are elderly. **(24 CFR § 5.403)**
16. Displaced Person - A person displaced by government action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise recognized pursuant to Federal disaster relief laws. This definition is used for eligibility determinations only. It should not be confused with the Federal preference for involuntary displacement. **[(42 USC 1437a(b)(3))]**
17. Divestiture Income - Imputed income from assets, including business assets, disposed of by applicant or resident in the last two years at less than fair market value. (See the definition of Net Family Assets **(24 CFR § 5.603)** in this section.)
18. Drug related Criminal activity – means drug trafficking, illegal use, or possession for personal use of a controlled substance (as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]).
19. Drug Trafficking – means the illegal manufacture, sales, distribution, use or possession with intent to manufacture, sell, distribute or use, of a controlled substance (as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]).
20. Elderly Family - A family whose head or spouse (or sole member) is at least 62 years of age. It may include two or more elderly persons living together, and one or more such persons living with one or more persons, including live-in aides, determined to be essential to the care and well-being of the elderly person or persons. An elderly family may include elderly persons with disabilities and other family members who are not elderly. **(24 CFR § 5.403)**
21. Elderly Person - A person who is at least 62 years of age. **[42 USC 1437a(b)(3)]**
22. Extremely Low Income Family – A Family whose Annual Income is equal to or less than 30% of Area Median Income, as published by HUD.
23. Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of law who will live together in CMHA housing; **OR** two or more persons who are not so related, but are regularly living together, can verify shared income or resources who will live together in CMHA housing.

The term family also includes: Elderly family (Definition #18), Near elderly family (Definition #32) disabled family (Definition #15), displaced person (Definition #16), single person (Definition #41), the remaining member of a tenant family, a foster care arrangement, or a kinship care arrangement (Definition #25). Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. **(24 CFR §§ 5 and 960)**

Live-in Aides (Definition #26) may also be considered part of the applicant family's household. However, live-in aides are not family members and have no rights of tenancy or continued occupancy.

Foster Care Arrangements include situations in which the family is caring for a foster adult, child or children in their home who have been placed there by a public child placement agency, or a foster adult or adults placed in the home by a public adult placement agency.

For purposes of continued occupancy: the term family also includes the remaining member of a resident family with the capacity to execute a lease.

24. Full-Time Student - A person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. Educational institution shall include but not be limited to: college, university, secondary school, vocational school or trade school **(24 CFR 5.603)**.

25. Head of the Household - Head of the household means the family member (identified by the family) who is held responsible and accountable for the family.

26. Individual with Handicaps, Section 504 definition **[24 CFR § 8.3]**

Section 504 definitions of Individual with Handicaps and Qualified Individual with handicaps are not the definitions used to determine program eligibility. Instead, use the definition of person with disabilities as defined later in this section. Note: the Section 504, Fair Housing, and Americans with Disabilities Act (ADA) definitions are similar. ADA uses the term “individual with a disability”. Individual with handicaps means any person who has:

- a. A physical or mental impairment that: substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment.
- b. For purposes of housing programs, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.
- c. Definitional elements:
  - (1) “physical or mental impairment” means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
  - (2) Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.
  - (3) “Major life activities” means functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.
  - (4) “Has a record of such an impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

- (5) “Is regarded as having an impairment” means has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation; or
- (6) Has a physical or mental impairment that substantially limits one or more major life activities only as result of the attitudes of others toward such impairment; or
- (7) Has none of the impairments defined in this section but is treated by a recipient as having such an impairment.

NOTE: A person would be covered under the first item if CMHA refused to serve the person because of a perceived impairment and thus “treats” the person in accordance with this perception. The last two items cover persons who are denied the services or benefits of CMHA’s housing program because of myths, fears, and stereotypes associated with the disability or perceived disability.

- d. The 504 definition of handicap does not include homosexuality, bisexuality, or transvestitism. Note: These characteristics do not disqualify an otherwise disabled applicant/resident from being covered. The 504 definition of individual with handicaps is a civil rights definition. To be considered for admission to public housing a person must meet the program definition of person with disabilities found in this section.
27. Kinship care - an arrangement in which a relative or non-relative becomes the primary caregiver for a child or children but is not the biological parent of the child or children. The primary caregiver need not have legal custody of such child or children to be a kinship caregiver under this definition. (Definition provided by the Kinship Care Project, National Association for Public Interest Law).
28. Live-in Aide - A person who resides with an elderly person(s), near elderly person(s) or person(s) with disabilities and who: (a) is determined by CMHA to be essential to the care and well being of the person(s); (b) is not obligated to support the family member; and (c) would not be living in the unit except to provide the necessary supportive services (**24 CFR 5.403**). CMHA policy on Live-in Aides stipulates that:
- a. Before a Live-in Aide may be moved into a unit, a third-party verification must be supplied that establishes the need for such care and the fact that the live-in aide is qualified to provide such care;
  - b. Move-in of a Live-in Aide must not result in overcrowding of the existing unit according to the maximum-number-of-persons-per-unit standard (although, a reasonable accommodation for a resident with a disability may be to move the family to a larger unit);
  - c. Live-in Aides have no right to the unit as a remaining member of a resident family;
  - d. Relatives who satisfy the definitions and stipulations above may qualify as Live-in Aides, but only if they sign a statement prior to moving in relinquishing all rights to the unit as the remaining member of a resident family;
  - e. A Live-in aide is a single person;
  - f. A Live-in Aide will be required to meet CMHA’s screening requirements with respect to past behavior especially:
    - (1) A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at present or prior residences that may adversely affect the health, safety, or welfare of other tenants or neighbors;

- (2) Criminal activity such as crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity that would adversely affect the health, safety, or welfare of other residents or staff or cause damage to the unit or the development; and
- (3) A record of eviction from housing or termination from residential programs.
29. Low-Income Household - A family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller and larger families **(42 USC 1437a(b))**.
30. Medical Expense Allowance - For purposes of calculating adjusted income for elderly or disabled families only, medical expenses mean the medical expense in excess of 3% of Annual Income, where these expenses are not compensated for or covered by insurance. **(24 CFR § 5.603)**.
31. Minor - A minor is a person less than 18 years of age. An unborn child will not be considered as a minor. (See definition of dependent.)
32. Mixed Population Project - means a public housing project for elderly and disabled families. The CMHA is not required to designate this type of project under the Extension Act. **(PIH Notice 97-12)**
33. Multifamily housing project - For purposes of Section 504, means a project containing five or more dwelling units. **(24 CFR § 8.3)**
34. Near-elderly family - means a family whose head, spouse, or sole member is a near-elderly person (at least 50 but less than 62 years of age), who may be a person with a disability. The term includes two or more near-elderly persons living together, and one or more such persons living with one or more persons who are determined to be essential to the care or well-being of the near-elderly person or persons. A near-elderly family may include other family members who are not near-elderly. **(24 CFR § 5.403)**
35. Near-elderly person - means a person who is at least 50 years of age but below 62, who may be a person with a disability **(42 USC 1437a(b)(3))**
36. Net Family Assets - The net cash value, after deducting reasonable costs that would be incurred in disposing of: **[24 CFR § 5.603]**
- a. Real property (land, houses, mobile homes)
  - b. Savings (CDs, IRA or KEOGH accounts, checking and savings accounts, precious metals)
  - c. Cash value of whole life insurance policies
  - d. Stocks and bonds (mutual funds, corporate bonds, savings bonds)
  - e. Other forms of capital investments (business equipment)

Net cash value is determined by subtracting the reasonable costs likely to be incurred in selling or disposing of an asset from the market value of the asset. Examples of such costs are: brokerage or legal fees, settlement costs for real property, or penalties for withdrawing saving funds before maturity.

Net Family assets also include the amount in excess of any consideration received for assets disposed of by an applicant or resident for less than fair market value during the two years preceding the date of the initial certification or reexamination. This does not apply to assets transferred as the result of a foreclosure or bankruptcy sale.

In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be less than fair market value if the applicant or resident receives important considerations not measurable in dollar terms **(24 CFR § 913.102)**.

37. Person with disabilities<sup>24</sup> (**42 USC 1437a(b)(3)**) means a person<sup>25</sup> who —
- a. Has a disability as defined in Section 223 of the Social Security Act (**42 USC 423**); or,
  - b. Has a physical or mental impairment that:
    - (1) Is expected to be of long continued and indefinite duration;
    - (2) Substantially impedes his/her ability to live independently; and,
    - (3) Is of such nature that such disability could be improved by more suitable housing conditions; or,
  - c. Has a developmental disability as defined in Section 102 (5) (b) of the Developmental Disabilities Assistance and Bill of Rights Act [**42 USC 6001 (5)**].
38. Portion of project - includes, one or more buildings in a multi-building project; one or more floors of a project or projects; a certain number of dwelling units in a project or projects. (**24 CFR § 945.105**)
39. Project, Section 504 - means the whole of one or more residential structures & appurtenant structures, equipment, roads, walks, & parking lots that are covered by a single contract for Federal financial assistance or application for assistance, or are treated as a whole for processing purposes, whether or not located on a common site. [**24 CFR § 8.3**]
40. Qualified Individual with handicaps, Section 504 - means an individual with handicaps who meets the essential eligibility requirements and who can achieve the purpose of the program or activity without modifications in the program or activity that the CMHA can demonstrate would result in a fundamental alteration in its nature.
- a. Essential eligibility requirements include: ...stated eligibility requirements such as income as well as other explicit or implicit requirements inherent in the nature of the program or activity, such as requirements that an occupant of multifamily housing be capable of meeting the recipient's selection criteria and be capable of complying with all obligations of occupancy with or without supportive services provided by persons other than the CMHA.
  - b. For example, a chronically mentally ill person whose particular condition poses a significant risk of substantial interference with the safety or enjoyment of others or with his or her own health or safety in the absence of necessary supportive services may be "qualified" for occupancy in a project where such supportive services are provided by the CMHA as a part of the assisted program. The person may not be 'qualified' for a project lacking such services. (**24 CFR § 8.3**)
41. Single Person - A person who is not an elderly person, a person with disabilities, a displaced person, or the remaining member of a resident family.
42. Spouse - Spouse means the husband or wife of the head of the household.
43. Tenant Rent - The amount payable monthly by the Family as rent to CMHA. Where all utilities (except telephone) and other essential housing services are supplied by the Authority, Tenant Rent equals Total Tenant Payment. Where some or all utilities (except telephone) and other essential housing services are not

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<sup>24</sup> NOTE: this is the program definition for public housing. The 504 definition does not supersede this definition for eligibility or admission. [**24 CFR 8.4 (c) (2)**]

<sup>25</sup> A person with disabilities may be a child.



supplied by the CMHA and the cost thereof is not included in the amount paid as rent, Tenant Rent equals Total Tenant Payment. **(24 CFR § 5.603).**

44. Total Tenant Payment (TTP) - The TTP is calculated using the following formula:
45. The greatest of 30% of the monthly Adjusted Income (as defined in these policies) or 10% of the monthly Annual Income (as defined in these policies), or the Welfare Rent if applicable, but never less than the Minimum Rent or greater than the Ceiling Rent, if any.
46. Uniform Federal Accessibility Standards - Standards for the design, construction, and alteration of publicly owned residential structures to insure that physically handicapped persons will have ready access to and use of such structures. **The standards are set forth in Appendix A to 24 CFR Part 40. See cross reference to UFAS in 504 regulations, 24 CFR § 8.32 (a).**
47. Utilities - Utilities means water, electricity, gas, other heating, refrigeration and cooking fuels, trash collection, and sewerage services. Telephone service is not included as a utility **(24 CFR § 965.473).**
48. Very Low-Income Family - Very low-income family means a family whose Annual Income does not exceed 50 percent of the median Annual Income for the area, with adjustments for smaller and larger families, as determined by the Secretary of Housing and Urban Development **(42 USC 1437a(b)).**

49. Working Family Preference - An admissions preference granted when:

A family can verify employment of an adult member:

- a. Employment at the time of the offer — To receive this preference the applicant family must have at least one family member, age 18 or older, employed at the time of CMHA's offer of housing. Employment at the time of the offer must be for the 90 day period immediately prior to the offer of housing and provide a minimum of 20 hours of work per week for the family member claiming the preference.
- b. Employment periods may be interrupted, but to claim the preference, a family must have an employed family member prior to the actual offer of housing as described above.
- c. A family member that leaves a job will be asked to document the reasons for the termination. Someone who quits work after receiving benefit of the preference (as opposed to layoff, or taking a new job) will be considered to have misrepresented the facts to CMHA and will have their assistance terminated.
- d. The amount earned shall not be a factor in granting this local preference. This local preference shall also be available to a family if the head, spouse, or sole member is 62 or older, or is receiving social security disability, or SSI disability benefits, or any other payments based on the individual's inability to work. **[Required, 24 CFR 960.212 (b) (1)]**

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