

2. Maximize the supply of public housing units by maintaining a vacancy rate, adjusted for modernization, of 3% or less.
3. Leverage private or other public funds to create additional subsidized housing units by submitting Low Income Housing Tax Credit applications for new development projects of more than 40 units.
4. Continue to effectively administer replacement voucher program for HUD enforcement actions.
5. Increase housing choices by applying for mobility vouchers and counseling grants, and by maintaining and increasing participants in the voucher homeownership program annually.
6. Collaborate with City, County, and non-profits to end homelessness.
7. Successfully complete major on-going and planned redevelopment efforts and commitments.
8. Expand development of funding opportunities and other affordable housing projects outside of our Annual Contributions Contract with HUD.

B. Manage the properties and physical assets of the Authority in an accountable and responsible manner always striving to meet the highest standards.

Objectives:

1. Improve public housing management by striving for high-performer status while maintaining standard performance level as measured by PHAS.
2. Improve voucher management by continuing to achieve high-performer status as measured by SEMAP, given appropriate funding from HUD.
3. Address deferred maintenance issues and need to demolish or dispose of obsolete public housing at Olde Cedar, Outhwaite, Carver Park, Lakeview Terrace, and Woodhill Homes by creating redevelopment plans and seeking any available funding opportunities.
4. Provide replacement public housing in accordance with CMHA Replacement Housing Policy to fullest extent possible with available resources.
5. Expand and upgrade information technology systems as needed to improve the tracking, reporting, and analysis of all CMHA functions.
6. Continue with effort to institute an agency-wide document imaging plan for all departments.
7. Increase housing choices by implementing site-based waiting lists for the Public Housing program.
8. Reduce energy consumption by 20% over the next 10 years through the Better Buildings Challenge.
9. Apply for a Moving to Work (MTW) designation when made available by HUD.

C. Improve the living environment and quality of life for families served by CMHA housing programs.

Objectives:

1. Maintain a Police and Security force that is responsive to the safety of residents and security of CMHA property.
2. Implement public housing security improvements by continuing to upgrade physical security systems (access control and cameras) and lighting at CMHA properties.
3. Continue to provide housing dedicated to the needs of elderly persons by maintaining the designation of certain developments through a Designated Housing Plan for the Elderly with HUD.
4. Complete implementation of the Voluntary Compliance Agreement with HUD to make Public Housing units (5%), offices, common areas, and sites fully accessible by UFAS standards for persons with disabilities.
5. Enhance housing opportunities for voucher holders through outreach to participating communities and to maintain effective relationships with local municipalities through the Inner-Ring Suburbs consortium.
6. Ensure equal opportunity and affirmatively further fair housing by undertaking measures that ensure access to all housing programs regardless of race, color, religion national origin, sex, familial status, and disability.
7. Incorporate green technologies and sustainable practices into all new developments, and existing developments to the highest degree possible.
8. Implement the Central Choice Transformation Plan.
9. Develop and implement a pilot for non-smoking buildings.

D. Develop a highly skilled workforce that provides services to residents and participants with excellence and within a department structure that is flexible, efficient, and promotes teamwork.

Objectives:

1. Increase response time and increase quality service delivery of the Public Housing AMP structure and Housing Choice Voucher program through ongoing staff development.
2. Recruit, develop, motivate, retain, and recognize high performing employees and leaders in a supportive learning culture that prioritizes staff training and development.
3. Revise the Administrative Plan for HCVP and the Admissions and Continued Occupancy Policy (ACOP) to provide guidance to staff and train staff on revisions and how to implement policy.
4. Increase the positive awareness of CMHA by telling its compelling story through dynamic communication vehicles that educate and inspire target audiences about its value to the community.
5. Reevaluate AMP structure to maximize effectiveness and place management of RAD and Section 8 New Construction properties under a separate department.

E. Empower and equip families to improve their quality of life and achieve economic stability.

Objectives:

1. Raise average annual income at family properties through providing job training and economic development programs, including the Section 3, and the Minority and Female Business Enterprise programs.
2. Provide or attract supportive services to improve residents' employability, including training in job readiness skills, occupational skills and life skills.
3. Provide or attract supportive services to assist youths in their transition to self-sufficient adults.
4. Continue to seek funding to increase supportive services, and enter into agreements to fill identified service gaps.
5. Maximize annual enrollment in the Family Self Sufficiency (FSS) program.
6. Collaborate with governmental and private agencies to increase supportive housing programs.

6.0 PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

This PHA Plan Update contains the information that the Cuyahoga Metropolitan Housing Authority (CMHA) is submitting as the Public Housing Agency Plan (PHA Plan) for FY2016, and relates the Annual PHA Plan programs and activities to CMHA's mission and goals as described in the Five-year Plan. HUD has implemented an abbreviated template for the PHA Plan, which only requires the presentation of information that has changed from the previous year's (2015) PHA Plan. In addition to the changes and updates from 2015, this document will include a brief summary of CMHA policies and plans that are part of the PHA Plan. All elements of the last full PHA Plan from 2009 are available for reference at the CMHA website: www.cmha.net and the 2016 PHA Plan is available for review at the CMHA Headquarters and all AMP offices.

This PHA Plan was prepared in collaboration with a Resident Advisory Board and many of our community partners. Their participation and comments are documented in Section 11.0 (f and g). The notice for a Public Hearing was published on August 17, 2015, and a draft of the PHA Plan and associated documents was made available for public comment, including being posted on the CMHA website. The Board Chairman conducted a Public Hearing on September 30, 2015 to obtain comments. The CMHA Board of Commissioners passed resolution# 77-15 authorizing and adopting the FY2016 PHA Plan at a Board Meeting held on the October 7, 2015.

6.01 Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures are summarized in Section 3 of the 2009 Annual Plan. Based upon the requirements of the Quality Housing and Work Responsibility Act (QHWRA) of 1998, CMHA adopted a new Admissions and Continued Occupancy Policy (ACOP) and revised Dwelling Lease for 2001. As part of the 2013 PHA Plan review process, the Dwelling Lease was revised, and the ACOP continues to be reviewed annually. For 2016, the Public Housing program will add a tenth preference for “homeless families with children” to the preference categories that were previously in effect. In 2016, Public Housing program preferences will consist of seven high priority (1) preferences for:

- a) victims of natural disasters,
- b) involuntary displacement,
- c) successful completion of a substance abuse treatment or supportive housing program housed within or in partnership with CMHA,
- d) individuals aging out of foster care,
- e) enrollment in the County’s Pay for Success Intervention Model for Family Unification,
- f) transfers from other CMHA managed housing programs, and
- g) homeless families with children:

and three standard priority (2) preferences for:

- g) homelessness {with referral letter from recognized homeless shelter},
- h) working families and those unable to work because of age (**elderly**) or disability (**disabled**), and
- i) veterans and veterans’ families.

For 2016, the Housing Choice Voucher (HCVP) program will utilize fourteen preference categories that will include a new preference for the “Family Unification Program.” The following HCVP preferences are ranked according to the points associated with them:

- HUD-directed special admissions – 40 points on the general Tenant-Based and general Project-Based Waiting Lists;
- Relocating Residents of Agency Owned Subsidized Properties – 40 points on the general Tenant-Based and general Project-Based Waiting Lists;
- Victims of natural disasters - 40 points on the general Tenant-Based and general Project-Based Waiting Lists;
- Project-based in-place families – 40 points on the Project-Based Waiting Lists;
- Money Follows the Person/Ohio Home Choice – 40 points on the general Tenant-Based Waiting List;
- Veteran’s Affairs Supportive Housing (VASH) – 40 points on the general Tenant-Based Waiting List;
- Moderate Rehabilitation program (participating families who must relocate because the family has a disabled member and there are no accessible Mod Rehab units of the appropriate size or type, or the owner has opted out of the program, or if there has been a HUD takeover, or if the contract with the owner is cancelled) - 30 points on the general Tenant-Based Waiting List;
- Cuyahoga County residency – 10 points on the general Tenant-Based Waiting List;
- Intergenerational families – 10 points on the Intergenerational Housing (Griot Village) Project-Based Site-Based Waiting List;
- Chronically homeless – 10 points on the Chronically Homeless Permanent Supportive Housing Project-Based Site-Based Waiting List;
- Chronically homeless and elderly/near-elderly – 15 points on the Chronically Homeless Elderly/Near-elderly Permanent Supportive Housing Project-Based Site-Based Waiting List;
- Homeless – 10 points on the Homeless Permanent Supportive Housing Project-Based Site-Based Waiting List;
- Single Room Occupancy (SRO) – 10 points on the Moderate Rehabilitation Waiting List; and
- Family Unification Program – 40 points on the general Tenant-Based Waiting List.

CMHA opened the HCVP tenant-based waiting list during August 2015 to replenish the list of applicants needed for turnover and/or new vouchers, if they are awarded by HUD. CMHA will not be opening the HCVP Tenant-Based waiting list during 2016.

CMHA will consider the adoption of site-based waiting lists at some or all public housing locations during 2016. Site based waiting lists will continue to be utilized at the Oakwood properties (Villas and Gardens); the properties managed by our partner organizations (Eastside Homes, Union Court, Westside Homes, Gordon Square, Tremont Pointe I and II); tax credit properties (Riverside Park Homes, Heritage View, Mildred Brewer (Belmore-Euclid), Lee-Miles Apartments, and Miles Pointe); and the properties being converted to the Rental Assistance Demonstration (RAD) program (Bohn Tower, Heritage View IV, and Cedar Extension). Four other public housing properties (Carver Park, Riverside Park, Midwest Cluster and Springbrook/Wade) have been approved for RAD and will have site-based waiting lists after conversion. CMHA has upgraded its screening criteria capacity to include national criminal records.

CMHA plans on continuing to meet the QHWRRA income targeting requirements of ensuring that 40% of new public housing occupancy and 75% of HCVP new admissions will be given to extremely low income families, now defined as families whose income does not exceed the higher of the Federal poverty level or 30% of the area median income. CMHA has also changed the definition of family and the requirement to provide equal access regardless of sexual orientation, gender identity or marital status, as stated in PIH Notice 2014-20.

Under deconcentration of poverty, CMHA has identified Olde Cedar and Woodhill Homes as properties where the average income falls below the HUD prescribed formula, and two properties (Heritage View and Riverside Park) where the average income is above the HUD prescribed formula. To address this issue, CMHA has chosen a strategy of working with the current residents to raise their incomes rather than adjusting it through changes to the admissions criteria.

Updated Waiting List information for the Housing Choice Voucher and Public Housing programs are provided in the following tables:

<i>Housing Needs of Families on the Waiting List</i>			
<i>Analysis based on Wait List as of July 2015</i>			
Section 8 tenant-based assistance (Housing Choice Voucher Program)			
	<i># of families</i>	<i>% of total families</i>	<i>Annual Turnover</i>
Waiting list total	332		600
Extremely low income <=30% AMI	320	96.4%	
Very low income (>30% but <=50% AMI)	5	1.5%	
Low income (>50% but <80% AMI)	7	2.1%	
Families with children	305	91.9%	
Elderly families	0	0.0%	
Families with Disabilities	5	1.5%	
Black	306	92.2%	
White	20	6.0%	
Other	6	1.8%	

Housing Needs of Families on the Waiting List

Analysis based on Wait List as of July 2015

Is the waiting list closed (select one)? No Yes

If yes:

How long has it been closed (# of months)? 48 (it was last opened during August 2011)

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

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?
 No Yes (VASH, HUD-directed special admissions, relocating residents of Agency-owned subsidized properties, victims of natural disasters, project-based in-place families, Mod Rehab participants who must relocate because the family has a disabled member and there are no other Mod Rehab units of the appropriate size or type, or the owner has opted out of the program, or if there has been a HUD takeover or if the contract with the owner is cancelled, Money Follows the Person Initiative/Ohio Home Choice), and the Family Unification Program.

Housing Needs of Families on the Waiting List

Analysis based on July 2015 Waiting List

Public Housing program

	<i># of families</i>	<i>% of total families</i>	<i>Annual Turnover</i>
Waiting list total	20,990		1,400
Extremely low income <=30% AMI	16,792	80.0%	
Very low income (>30% but <=50% AMI)	3,232	15.4%	
Low income (>50% but <80% AMI)	966	4.6%	
Families with children	6,715	32.0%	
Elderly families (62+)	218	1.0%	
Families with Disabilities	1,027	4.9%	
White	2,630	12.5%	
Black	17,956	85.6%	
Other	404	1.9%	
Characteristics by Bedroom Size			
1BR	14,638	69.74%	714
2 BR	4,822	22.97%	350
3 BR	1,107	5.27%	230
4 BR	347	1.65%	100
5 BR	72	0.34%	5
6+ BR	4	0.02%	1

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

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

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

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

6.02 Financial Resources of approximately \$211 million will be available to CMHA in FY2016 to operate and/or administer a variety of low-income housing programs. Based upon FY2015 funding levels, CMHA anticipates receiving funding or funding commitments of about \$177 million from HUD during FY2016. Of that amount, \$91 million will be for direct housing assistance payments to HCVP landlords, and about \$60 million is estimated as subsidy to support the management and maintenance operations of the public housing program. About \$19 million is anticipated to be awarded for public housing capital improvements through the Capital Fund Program (CFP) in addition to around \$1 million of Replacement Housing Factor (RHF) funds. Another \$5 million will be generated through HAP payments for the Section 8 New Construction and RAD programs, as well as \$1 million from the new Jobs Plus program grant.

Financial Resources: Planned Sources and Uses (Estimated)		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY2016 grants)		
a) Public Housing Operating Fund	60,000,000	
b) Public Housing Capital Fund	18,870,000	
c) HOPE VI Revitalization	0	
d) HOPE VI Demolition	0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	91,500,000	
f) Public Housing Drug Elimination Program	0	
g) Resident Opportunity and Self-Sufficiency Grants	354,000	
h) Community Development Block Grant	0	
i) HOME	0	
Other Federal Grants (list below)		
Replacement Housing Fund	866,000	
Section 8 New Construction HAP	3,000,000	
Rental Assistance Demonstration (RAD)	1,500,000	
Jobs Plus	1,000,000	
COPS	149,000	
Total 2016 Grants (estimated)	177,239,000	
2. Prior Year Federal Grants (unobligated funds only)		
	As of 6/30/15	
Public Housing Capital Fund (CFP)	14,503,000	Capital and Management Improvements
Replacement Housing Fund (RHF)	6,839,000	Replacement housing
ROSS Service Coordinators grants	0	Services for families
ROSS Neighborhood Networks grant	0	Supportive services
21 st Century grant	0	Education
Salvation Army/Y-Haven grants	386,000	Transitional housing
Other misc. grants	20,000	Supportive services
Total Unobligated prior-year grants	21,748,000	
3. Public Housing Dwelling Rental Income		
Public Housing Dwelling Income	14,181,000	Public Housing operations
4. Other income (list below)		
Section 8 Administrative Fees	8,100,000	HCVP program administration

<i>Financial Resources: Planned Sources and Uses (Estimated)</i>		
Sources	Planned \$	Planned Uses
Section 8 New Construction revenue	1,612,000	Housing operations
Rental Assistance Demonstration (RAD)	389,000	
5. Non-federal sources (list below)		
Interest	55,000	Housing operations
Miscellaneous	1,600,000	Housing operations
Woody Woods rents	159,000	Housing operations
Total Resources	210,902,000	

Please Note:

- (1) All Federal Grants for FY2016 are estimated based upon FY2015 levels.
- (2) Grant amounts indicate unobligated balances and will not all be spent in FY2016 since HUD allows multi-year periods for obligation and expenditure.

Unobligated balances from prior year grants amount to about \$22 million, mostly from HUD grant awards for capital improvement programs such as CFP and RHF, which have multi-year obligation and expenditure periods, so only a portion of this amount will be used during 2016. Another \$26 million of funding from other sources is also expected, of which over \$14 million is anticipated as rental income from public housing residents. The Section 8 program will generate \$8 million in administrative fees, which will be used for the administration of the Housing Choice Voucher Program. CMHA manages three Section 8 New Construction properties that will generate \$1.6 million, in addition to the new Rental Assistance Demonstration Program (RAD) that will generate about 400,000 in revenues, other than subsidy. CMHA also anticipates interest income of about \$55,000 in 2016.

6.03 Rent Determination policies for the Public Housing and Housing Choice Voucher Programs were revised to meet the requirements of QHWRA in 2001 as part of the initial ACOP and revised HCVP Administrative Plan. There are no rent determination policy changes to these documents planned for 2016, which means that CMHA will maintain minimum rent amounts for the Housing Choice Voucher program at \$50 per month and the Public Housing program at \$25 per month, with the “hardship” conditions prescribed by QHWRA. In 2016, the HCVP will operate with payment standards that fall within a range of 90% to 110% of FMR levels, although exceptions are permitted if authorized by HUD.

During 2014, CMHA changed its Public Housing flat rent policies to comply with the statutory changes contained within Public Law 113-76, which required that flat rent amounts be set at no less than 80% of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utilities costs. For 2016, CMHA will change the basis for determining flat rents to the applicable Small Area Fair Market Rent (SAFMR). This law also required that the utility allowance for a Voucher Program rental must be calculated on the voucher size established for the family rather than the bedroom size of the actual unit. CMHA has implemented the mandatory exclusions from adjusted income determination for employment and increases in earned income.

6.04 Operations and Management policies for the Public Housing program, including the Admissions and Continued Occupancy Policy (ACOP), are reviewed annually and revised as necessary. The HCVP Administrative Plan is revised and updated annually to reflect continuing programmatic changes from HUD, and adjustments for proposed federal budget limitations. With over 8,900 families in the Public Housing program, about 15,000 families in the Housing Choice Voucher program, and another 800 families in the Section 8 New

Construction/Rental Assistance Demonstration (RAD) program, considerable focus will continue to be placed on improved customer satisfaction, and filling the expected 2,000 units that will become available as a result of program turnover from these housing programs. The following table contains updated program information.

<i>Operations and Management table</i>		
Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	8,900 families	1,400
Rental Assistance Demonstration (RAD)	200 families	30
Section 8 New Construction	570 units	60
Section 8 Vouchers	15,204 baseline units	600
Section 8 Mod Rehab	145 units	15
Special Purpose Section 8 Vouchers (list individually)	145 – Mainstream (elderly & non-elderly disabled)	5
	508 – VASH	10
	400 – Non-elderly Disabled	8
	64 – Family Unification Program	2
Other Federal Programs:		
Family Self Sufficiency	200 families	13
ROSS Neighborhood Network	3000 contacts	N/A
Continuum of Care Transitional Housing	180 men	50
Jobs Plus	300 families	100

The Section 8 New Construction properties along with the Public Housing properties being converted to Project Based Rental Assistance (PBRA) under the Rental Demonstration (RAD) program will follow the HUD Multi-family Housing program rules and guidance provided in HUD Handbook 4350.

6.05 Grievance Procedures for the Public Housing program and HCVP are available as supporting documents to the PHA Plan. The Public Housing grievance procedure is part of the ACOP, and the HCVP informal hearing and review procedure is part of its Administrative Plan.

6.06 Designated Housing for Elderly and Disabled Families. CMHA has 2,329 units at seventeen properties that are designated for the elderly as listed in the table below. The initial designated housing plan was approved by HUD in 2001, was revised in 2003, and was amended in 2006 to add Union Court, in 2008 to add Riverside Park Homes senior building, and in 2011 to add Lee-Miles Apartments and Miles Pointe. In 2015, Bohn Tower was converted to RAD, and the Riverside Park Homes senior building is scheduled for conversion in 2016. CMHA has requested and received two-year extensions of the designated housing plan in 2008, 2010, 2012 and 2014, and will request another extension in 2015 for 2016-2017. Through this designation, new admissions or transfers to these estates have been prioritized for the Elderly (age 62+) and Near-Elderly (age 50-61).

<i>Housing Properties Designated for the Elderly table</i>					
	<i>Development Name</i>	<i>AMP#</i>	<i>Development#</i>	<i>Units</i>	<i>Partial/Total</i>
1	Addison Square	905	OH003-034	220	Total
2	Apthorp	907	OH003-037	163	Total
3	Beachcrest	907	OH003-035	236	Total
4	Cedar Extension	901	OH003-011	155	Total
5	Euclid Beach	907	OH003-052	150	Total
6	Fairway Manor	910	OH003-077	55	Total
7	King Kennedy North	904	OH003-026	176	Total

8	LaRonde	907	OH003-030	57	Total
9	Lorain Square	910	OH003-040	111	Total
10	Mt. Auburn	906	OH003-039	105	Total
11	Oakwood Villas	906	OH003-054	92	Total
12	Riverside Park Senior Bldg. *	924	OH003-120	28	Partial
13	Riverview Towers	909	OH003-025	490	Total
14	Scranton Castle & Extension	909	OH003-036	160	Total
15	Eastside/Union Court Apts.	921	OH003-112	48	Partial
16	Lee-Miles Apartments	931	OH003-134	40	Total
17	Miles Pointe	932	OH003-135	43	Total

* Properties being converted to RAD

6.07 Community Service and Self Sufficiency programs are an integral part of CMHA’s efforts to empower its residents to attain and sustain self-sufficiency while living in healthy communities. CMHA has restructured its Resident Services Department to deliver a more focused approach in providing self-sufficiency programming and activities. Programs are designed to provide residents with access to supportive services and resources needed to develop and maintain lifestyles that are economically secure. Programs range from tutoring for children to supportive housing for seniors. Diverse community resources, case management services, educational enrichment, are among the many services coordinated for residents. Domestic violence support groups and resident forums have been added to the array of provided services to address other issues that may hinder self-sufficiency. CMHA also provides direct and indirect access to literacy services, vocational training, and employment opportunities for both Public Housing residents and Housing Choice Voucher participants. The primary goal is to support families making the transition from welfare to work and assist others in maintaining healthy lifestyles.

CMHA has complied with the QHWRA requirement concerning income changes for welfare recipients through modification of its income definition in the Admissions and Continued Occupancy Plan (ACOP) and the HCVP Administrative Plan. The relevant sections have been modified to exclude the decreasing of tenant payments as a result of welfare fraud, and failure to comply with participation requirement of a self-sufficiency program. Another QHWRA provision that has been implemented is the community service requirement, which requires most non-working adult residents of public housing to perform at least 8 hours/month of community service, and is applicable for residents at all public housing properties.

6.08 Safety and Crime Prevention is a key component of CMHA’s housing strategy. CMHA is one of a few housing authorities in the country maintaining a dedicated police force. The CMHA Police Department was nationally accredited in March 1998 with re-accreditations in 2001, 2004, 2007, 2010, and 2013. The CMHA Police Department engages in active law enforcement, prevention efforts and interventions with residents. The Department is organized into two (2) functions: Field Operations and Administrative Operations. In addition to Basic Patrol services, it operates a Crime Suppression Unit, a K-9 Unit, a Detective Bureau to investigate Part I and II crimes, and maintains a part-time SWAT Team. Officers are deployed onto family estates to engage in community policing strategies and utilize the SARA model for identifying and resolving problems.

The CMHA Police Department has been nationally recognized for innovative policing strategies and positive engagement with residents. The department provides effective above baseline services to residents to address quality of life concerns. The department is extremely proactive in collaborating with social service agencies to provide immediate interventions and counseling to victims of crime and their families. The CMHA Police Department is also active with various initiatives aimed at engaging youth to develop positive relationships as a means to prevent crime and disorder.

The CMHA Police Department maintains a communications/dispatch center to answer calls for service generated from residents. It also operates an Internal Affairs Unit to investigate integrity concerns and a Safety Management Unit that conducts agency-wide risk analysis. CMHA Police partners with various community resources to provide prevention and intervention programs for residents. The CMHA Police Department also participates in various multi-jurisdictional task forces with local, state and federal law enforcement agencies. The Department maintains a mutual aid agreement with the City of Cleveland Division of Police to coordinate joint investigations, and the City provides baseline services to CMHA communities.

A key element to improving safety and crime prevention at CMHA properties is the installation of security cameras, which are becoming an important tool for responding to drug-related crime emergencies that exist at the larger family properties. Security cameras will function as a situational measure that will allow areas to be kept under surveillance remotely and assist in abating emergencies. This makes it possible for CMHA PD members to respond to incidents when alerted and to have information about what to look for when they arrive. Digital images allow for post-incident analysis, helpful for successful investigations and prosecutions. The CMHA Radio Communication Center is a modern, state-of-the-art dispatch center that will be the “hub” for monitoring the cameras, and is staffed 24/7. CMHA has installed security camera systems at several of the larger family properties, and has been awarded emergency funding from HUD to install advanced security camera systems at the Lakeview Terrace, King Kennedy, Outhwaite, Woodhill and Bellaire Gardens properties.

HUD terminated the Public Housing Drug Elimination Program (PHDEP), which provided a funding source for combating drug and gang-related issues that continue to plague CMHA communities. Nonetheless, CMHA has found alternative methods to continue funding police efforts and focus on security measures, which include camera surveillance, resident safety committees, and referrals to social services.

6.09 Pets. CMHA’s Pet Policy is included in the ACOP, which was amended in 2001 to include family properties in accordance with a QHWRA requirement and HUD’s Final Rule. In 2002, CMHA added a provision that allows dogs and cats within the specified size limitations at single-family scattered site housing units. In 2009, in accordance with the Voluntary Compliance Agreement, CMHA amended the Pet Policy to clarify the definition of an “assistance animal” and the conditions that apply to them.

6.10 Civil Rights Certification is included with CMHA Plan Certifications.

6.11 Fiscal Year Audit of CMHA for the period ended December 31, 2014 was completed in July 2015 and was submitted to the Auditor of State. The independent auditor gave CMHA an unqualified opinion on the 2013 financial statements with no audit findings. CMHA has received an unqualified opinion on both its balance and income statements since 2000. Audit reports are available for review as supporting documentation to the PHA Plan and are also posted on the CMHA website.

6.12 Asset Management is a key component to CMHA’s planning efforts. To comply with the Operating Fund Final Rule and meet the “stop-loss” criteria that minimizes the subsidy loss under this rule, CMHA started operating under a new Project Based Accounting and Management (PBAM) system as of October 1, 2006, and submitted a “stop-loss” package to HUD in October 2007, which was eventually approved. This asset management approach involves the continuous and on-going review of the physical, fiscal, and management performance of each property. The criteria for this successful conversion to project-based management included the implementation of: project-based accounting, project-based management, a central office cost center, centralized services, review of project performance, capital planning, and risk management responsibilities related to regulatory compliance. As another step of implementing PBAM, CMHA created Asset Management Project (AMP) groupings of estates based on geographical and size criteria.

For 2016, CMHA will continue with the initial AMP groupings that HUD approved for CMHA in 2007. CMHA has requested that the new Bellaire Road Apartments 2 (16 units) and 3 (16 units), Walton Extension (3 units), and Woodland-East 115th (6 units) developments become part of the Small or Scattered Sites AMP. Since the original approval, additional new AMPs have been added for the mixed finance properties of Gordon Square, Riverside Park Homes, Tremont Pointe I and II (Valleyview HOPE VI), Riverview Replacement, Heritage View I, II and III (Garden Valley), Mildred Brewer (Belmore-Euclid), Lee-Miles Apartments, and Miles Pointe. A complete AMP listing is included in the table below.

Asset Management Project (AMP) groupings for 2016:

AMP	CMHA ACC Units - 6/30/15 Estate	Dev#	Type:		Bedroom Size:							Total
			Family	Hirise	0	1	2	3	4	5	6	
PUBLIC HOUSING:												
901	CEDAR EXTENSION	3011	241	156	0	104	98	108	87	0	0	397
901	CEDAR EXTENSION Ext.1	3023	12	0	0	0	0	12	0	0	0	12
901	OLDE CEDAR	3014	312	0	0	39	181	86	6	0	0	312
901	OLDE CEDAR MROP	3088	238	0	0	15	158	65	0	0	0	238
901	Cedar Central		803	156	0	158	437	271	93	0	0	959
902	LEGACY PARK APTS.	3127	36	0	0	30	6	0	0	0	0	36
902	OUTHWAITE (Ext.1)	3003	244	0	0	60	116	57	11	0	0	244
902	OUTHWAITE (original)	3015	100	0	0	24	60	12	4	0	0	100
902	OUTHWAITE (MROP)	3096	224	0	0	32	100	72	20	0	0	224
902	OUTHWAITE (HOPE VI)	3108	111	0	0	15	42	34	20	0	0	111
902	Outhwaite		715	0	0	161	324	175	55	0	0	715
903	CARVER PARK	3007	251	0	0	103	84	44	20	0	0	251
903	CARVER PARK (MROP)	3092	217	0	0	28	64	101	16	8	0	217
903	CARVER PARK HOPE VI - I	3110	190	0	0	9	55	71	54	1	0	190
903	CARVER PARK HOPE VI - II	3115	89	0	0	3	30	25	30	1	0	89
903	Carver Park		747	0	0	143	233	241	120	10	0	747
904	KING KENNEDY NORTH	3026	0	186	0	184	2	0	0	0	0	186
904	KING KENNEDY SOUTH	3018	24	285	84	159	42	24	0	0	0	309
904	RENAISSANCE (KKS MROP)	3086	66	0	0	0	0	36	20	10	0	66
904	DELANEY (KKS HOPE VI)	3107	126	0	0	0	18	90	12	6	0	126
904	PHOENIX VILLAGE Ph. 1	3109	45	0	0	0	9	29	7	0	0	45
904	PHOENIX VILLAGE Ph. 2	3114	53	0	0	0	11	29	13	0	0	53
904	King Kennedy		314	471	84	343	82	208	52	16	0	785
905	ADDISON SQUARE	3034	0	226	0	225	1	0	0	0	0	226
905	SPRINGBROOK	3022	25	202	16	186	25	0	0	0	0	227
905	SUPERIOR TERRACE	3076	0	0	0	0	0	0	0	0	0	0
905	WADE APTS.	3021	39	191	4	187	39	0	0	0	0	230
905	WILLSON APTS.	3024	56	220	120	100	0	24	32	0	0	276
905	Hough		120	839	140	698	65	24	32	0	0	959
906	GARDEN VALLEY (original)	3013	0	0	0	0	0	0	0	0	0	0
906	GARDEN VALLEY (Ext.1)	3019	0	0	0	0	0	0	0	0	0	0
906	GARDEN VALLEY (Ext.2)	3020	0	0	0	0	0	0	0	0	0	0
906	GARDEN VALLEY (Ext.3)	3027	0	0	0	0	0	0	0	0	0	0
906	MILES-ELMARGE	3041	0	140	0	139	1	0	0	0	0	140
906	MT. AUBURN MANOR	3039	0	109	0	108	1	0	0	0	0	109
906	OAKWOOD GARDENS	3074	25	0	0	0	0	25	0	0	0	25
906	OAKWOOD VILLA	3054	0	92	0	91	1	0	0	0	0	92
906	UNION SQUARE	3044	0	174	0	173	1	0	0	0	0	174
906	Southeast		25	515	0	511	4	25	0	0	0	540
907	APTHORP TOWER	3037	0	167	0	166	1	0	0	0	0	167

907	BEACHCREST TOWER	3035	0	243	19	183	40	1	0	0	0	243
907	EUCLID BEACH GARDENS	3052	0	150	0	149	1	0	0	0	0	150
907	LARONDE APTS.	3030	0	60	12	48	0	0	0	0	0	60
907	WOODHILL HOMES	3004	487	0	0	135	260	85	0	6	1	487
907	Eastside		487	620	31	681	302	86	0	6	1	1107
908	LAKEVIEW TERRACE	3016	506	0	0	138	213	133	16	2	4	506
908	LAKEVIEW TOWER	3031	0	213	0	211	2	0	0	0	0	213
908	Downtown		506	213	0	349	215	133	16	2	4	719
909	CRESTVIEW APTS.	3017	0	222	3	117	102	0	0	0	0	222
909	MANHATTAN TOWER	330B	0	29	5	24	0	0	0	0	0	29
909	PARK DENISON	330A	0	39	4	35	0	0	0	0	0	39
909	RIVERVIEW FAMILY	3078	8	0	0	0	0	0	0	0	8	8
909	RIVERVIEW TOWER	3025	0	506	1	503	2	0	0	0	0	506
909	SCRANTON CASTLE	3036	0	63	0	62	1	0	0	0	0	63
909	SCRANTON EXTENSION	353A	0	102	0	102	0	0	0	0	0	102
909	WEST BOULEVARD	353B	0	120	0	119	1	0	0	0	0	120
909	Near West		8	1081	13	962	106	0	0	0	8	1089
910	BELLAIRE GARDENS	3033	0	285	167	116	2	0	0	0	0	285
910	BELLAIRE TOWNHOUSES	3071	60	0	0	0	0	32	28	0	0	60
910	FAIRWAY MANOR	3077	0	55	0	54	1	0	0	0	0	55
910	LORAIN SQUARE	3040	0	111	0	110	1	0	0	0	0	111
910	RIVERSIDE PARK	3008	408	0	1	35	244	103	25	0	0	408
910	Far West		468	451	168	315	248	135	53	0	0	919
911	BELLAIRE EIGHT	3116	8	0	0	8	0	0	0	0	0	8
131	BELLAIRE RD APTS 2	3131	16	0	0	16	0	0	0	0	0	16
132	BELLAIRE RD APTS 3	3132	16	0	0	16	0	0	0	0	0	16
911	HARVARD TOWNHOUSES	3044	6	0	0	0	0	6	0	0	0	6
911	JEFFERSON-WEST 5TH	3050	18	0	0	0	0	14	4	0	0	18
911	LANDON	3038	10	0	0	0	0	10	0	0	0	10
911	WALTON PLACE	3038	12	0	0	0	0	12	0	0	0	12
129	WALTON EXT	3129	3	0	0	0	3	0	0	0	0	3
911	MILES SCATTERED	3041	1	0	0	1	0	0	0	0	0	1
911	NOAH EAST	3072	10	0	0	0	0	6	4	0	0	10
911	PURITAS GARDENS	3056	24	0	0	0	0	24	0	0	0	24
911	PURITAS GARDENS EXT.	3117	6	0	0	0	0	6	0	0	0	6
911	SCATTERED HOMES	3106	45	0	0	0	6	29	10	0	0	45
911	SCATTERED REHAB.	3073	152	0	0	0	61	87	4	0	0	152
911	SCATTERED TOWNHOUSES	3075	54	0	0	0	0	54	0	0	0	54
911	TURNKEY SCATTERED	3126	27	0	0	0	0	3	21	3	0	27
911	WOODHILL SCATTERED	344A	17	0	0	0	0	2	13	0	2	17
911	WOODHILL SHALE (Sunrise)	342A	14	0	0	0	0	0	8	0	6	14
128	WOODLAND-E115th	3128	6	0	0	0	2	4	0	0	0	6
911	Small or Scattered		445	0	0	41	72	257	64	3	8	445
920	ADDISON TOWNHOUSES	3032	36	0	0	0	0	7	22	0	7	36
921	EASTSIDE HOMES	3112	48	0	0	0	9	32	7	0	0	48
921	UNION COURT	3119	0	48	0	48	0	0	0	0	0	48
922	WESTSIDE HOMES	3111	38	0	0	12	26	0	0	0	0	38
923	GORDON SQUARE	3113	58	0	0	52	6	0	0	0	0	58
924	RIVERSIDE PARK HOMES	3120	62	28	0	24	10	38	18	0	0	90
925	TREMONT POINTE I	3121	51	0	0	6	35	8	2	0	0	51
911	RIVERVIEW REPLACEMENT	3118	89	0	0	34	10	36	9	0	0	89
927	TREMONT POINTE II	3122	44	0	0	0	25	17	2	0	0	44
928	HERITAGE VIEW I	3123	81	0	0	3	47	24	7	0	0	81
929	HERITAGE VIEW II	3124	57	0	0	40	0	12	5	0	0	57

930	HERITAGE VIEW III	3125	69	0	0	4	37	23	5	0	0	69
931	BELMORE EUCLID	3133	0	39	0	32	7	0	0	0	0	39
931	LEE ROAD	3134	0	40	0	30	10	0	0	0	0	40
932	MILES POINTE	3135	0	43	0	33	10	0	0	0	0	43
PUBLIC HOUSING TOTAL			5271	4544	436	4680	2320	1752	562	37	28	9815
<u>RAD/SECTION 8 NEW CONST.:</u>												
	BOHN TOWER	3042	0	267	0	266	1	0	0	0	0	267
	AMBLESIDE TOWER	380	0	202	0	201	1	0	0	0	0	202
	QUARRYTOWN	382	0	181	0	180	1	0	0	0	0	181
	SEVERANCE TOWER	381	0	190	0	189	1	0	0	0	0	190
RAD/S8 NEW CONST. TOTAL			0	840	0	836	4	0	0	0	0	840

The anticipated 2016 ACC unit count of 9,815 units for the Public Housing program in this table reflects the unit inventory as of June 30, 2015, and includes 253ACC units that have been demolished at Cedar Extension family. Bohn Tower (from the Downtown AMP) has been converted to the Rental Assistance Demonstration (RAD) program. During 2016, Riverside Park Homes, Carver Park HOPE VI - I and II, Midwest Cluster (composed of 70 small property units), and Springbrook/Wade (from the Hough AMP) will be converted from Public Housing to PBRA under RAD, as well as new units from three additional RAD projects at Heritage View Phase 4 (60 units), Cedar Extension Phase I (49 units), and Cedar Extension Phase II (30 units).

CMHA has one unit that is occupied by a **Police Officer**, which is located at the Hough AMP (unit 341205).

CMHA conducted a **physical needs assessment and energy audit** during 2015 in accordance with HUD guidance to update the deferred maintenance and modernization issues at all properties. This assessment will allow for better planning and management of operating and capital funds, and provide the basis for future CFP Plans starting in 2016.

Moving to Work (MTW) is a demonstration program for public housing authorities that provides them with the opportunity to design and test innovative, locally-designed strategies that use Federal funding more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. If HUD announces openings for participation in the MTW program, CMHA would apply.

6.13 Violence Against Women Act (VAWA). CMHA provides services to assist the child and adult victims of domestic violence and to help them maintain their housing. When the CMHA Police are called into a domestic violence situation at a public housing property, they make an immediate referral to Frontline Services and/or Beech Brook Family Services, who provide follow-up, counseling, and assure that the appropriate resources are in place to assist the victim and any children. They also interact with CMHA staff, who will assist in resolving potential safety issues and transfer actions. CMHA also provides case management services for domestic violence victims through our Self Sufficiency Coordinators that are located at each public housing AMP, which includes making referrals to agencies that have been identified as offering assistance to such victims.

CMHA has incorporated the appropriate provisions, including notification, from the Violence Against Women Act (VAWA) into the ACOP, including the Public Housing Dwelling Lease, and HVCP Administrative Plan. Both the Public Housing and Housing Choice Voucher programs have notified residents/participants that the provisions of VAWA have been adopted in these policy documents and whom they should contact in the event they are a victim of or are facing lease violations for an actual or threatened domestic abuse incident. In the last year, CMHA has not knowingly denied any person for housing due to their being a victim of domestic violence.

6.14 Fair Housing. On July 16, 2015, HUD published the final rule implementing changes to the approach used by HUD program participants in carrying out their fair housing obligations. Under the Fair Housing Act of 1968, HUD program participants, including Public Housing Authorities were required to administer their programs in a manner that furthers the purposes of the Fair Housing Act. This long-standing obligation is known as Affirmatively Furthering Fair Housing (AFFH). In recent years, HUD required certain grant recipients, including Housing Authorities, to document their work to fulfill this obligation by undertaking an Analysis of Impediments (AI) to Fair Housing Choice, which was designed to assess how the jurisdiction’s “laws, regulations, policies and procedures affect the location, availability, and accessibility of housing and how conditions, both private and public, affect fair housing choice.”

The most significant change to the existing regulations implemented by the Final Rule is the replacement of the AI with a new assessment of fair housing priorities and goals called an Assessment of Fair Housing (AFH). In contrast to the policy-based AI, the Final Rule requires that participants, including Housing Authorities, assess:

- Patterns of integration and segregation;
- Racially and ethnically concentrated areas of poverty;
- Disparities in access to opportunity; and
- Disproportionate housing needs.

According to HUD, it will provide program participants with nationally-uniform data on these focus areas, as well as outstanding discrimination findings, through an “assessment tool.” Once program participants have analyzed the HUD data, as well as local or regional information they choose to add, they would identify the primary determinants influencing fair housing conditions, prioritize addressing these conditions, and set one or more goals for mitigating or addressing their determinants. A Housing Authority would then incorporate its AHF findings into its Consolidated Plan, PHA Plan, and Capital Fund Plan.

Although the Final Rule encourages local governments, states, and Housing Authorities to work together on the AFH, a Housing Authority will be permitted to prepare and submit its AFH on its own or jointly with other PHAs, its local jurisdiction, or state agencies. Pending further guidance and issuance of the assessment tool, CMHA will work with the appropriate local entities to develop an AFH during 2016.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. *Include statements related to these programs as applicable.*

7.0 (a). Hope VI or Mixed Finance Modernization or Development. In the Final Rule for the Public Housing Capital Fund Program, issued October 24, 2013, HUD decoupled the review and submission of Capital Fund documents from the PHA Plan. Although the 2016 Capital Fund Annual Statement and Five-Year Plan will be submitted separately during 2016, CMHA has developed a draft 2016 CFP Annual Plan and a CFP Five-Year Plan through 2020 for review and comment during the 2016 PHA Plan process. These statements summarize CMHA strategies for maintaining and improving the public housing stock. Due to fiscal year timing differences, CMHA will be funding most of its capital improvement activities during 2016 with FY2015 and prior year CFP funds. CMHA has based the CFP annual and five-year plans for FY2016 on the FY2015 funding amount of \$18.8 million. The needs and priorities for these plans were developed through input from residents and management, as well as recent capital needs studies and maintenance inspections.

HOPE VI

The following summary provides a brief summary of CMHA's four HOPE VI revitalization grants, all of which have been completed and closed:

1. King-Kennedy/Outhwaite (1993)

- OH003-018 & OH003-003/015
- Summary:
 - Conversion of King Kennedy South highrise into the Carl B. Stokes Social Services Mall {1996} that houses social service programs (originally 20 partners) and transitional housing programs (currently Y-Haven and Salvation Army)
 - Modernization of 126 units at King Kennedy South /Delaney Village {1997}
 - Modernization of 149 units at Outhwaite (with 58 unit reductions) {1998}
 - Modernization of 111 units at Outhwaite (with 27 units reductions) {2002}
 - Rehabilitation of Louis Stokes Community Center {2004}

2. Carver Park (1995)

- OH003-007 (OH003-110 & 115)
- Summary:
 - Demolition of 610 units {2002 – 2004}
 - Transfer of land to the Friendly Inn for construction of new Community Center {2003}
 - Construction of 279 new townhouse units on-site {2005}
 - Construction of 96 new units (48 scattered & 48 unit senior building) as Eastside off-site {2005}
 - Rehabilitation of 38 units (3 buildings) as Westside off-site {2005}
 - Rehabilitation of 58 units (Gordon Square) as Westside off-site {2006}
 - Provided 102 families with second mortgage assistance in Homeownership Zone

3. Riverview/Lakeview (1996)

- OH003-025 & OH003-016
- Summary:
 - Acquired 54 scattered site replacement units to relocate Riverview families {1998}
 - Demolished 135 family units at Riverview {2000}
 - Modernization of phase one (56 units) at Lakeview Terrace {2003}
 - Modernization of phase two (64 units) at Lakeview Terrace {2006}
 - Rehabilitation of Lakeview Terrace Community Center {2007}
 - Acquired 89 scattered site replacement units for Riverview {2009}
 - Modernization of phase three (66 units) at Lakeview Terrace {2009}

4. Valleyview /Tremont Pointe (2003)

- OH003-001 (OH003-121 & OH003-122)
- Summary:
 - Demolished 243 units {2005}
 - Received 9% Low Income Housing Tax Credits for Phase I {2005}
 - Phase I construction of 102 rental units (51 public housing) {2007}
 - Received 9% Low Income Housing Tax Credits for Phase II {2007}
 - Phase II construction of 87 rental units (44 public housing) {2009}
 - Committed remaining vacant land for Ohio-Erie Canal Corridor trails {2009}

Choice Neighborhoods

Under HUD's new Choice Neighborhoods Initiative (CNI), CMHA applied for a Planning grant in 2011 for the "Central Choice" neighborhood, which is closely aligned with the educationally oriented Promise Community effort in an area that runs between Euclid and Woodland Avenues on the north and south and between East 22nd

and East 55th Streets on the west and east. In 2012, CMHA was awarded a CNI Planning grant for \$500,000 that resulted in the development of a comprehensive Transformation Plan for this area, which includes the Cedar Extension, Olde Cedar, Outhwaite, and Carver Park public housing properties. The Transformation Plan focuses on three areas: Housing, People, and Neighborhood. The primary focus of the Housing component will be on the redevelopment of the Cedar Extension family and Olde Cedar properties as the target housing project, which provided the basis for CNI Implementation grant applications in 2013 (not funded) and 2015 (not funded), and again in 2016 if made available. With or without the Implementation grant, CMHA will proceed with implementing as many aspects of the People and Neighborhood components as possible,

Initial steps have been taken in the redevelopment process at Cedar Extension with the submission and approval of demolition plans (3 phases), completion of the demolition for all three phases, and an agreement that will allow Care Alliance to build a new health facility at this site with grant funds that were awarded to them in 2012, which was completed in 2015. CMHA and their developer partner, Falbo-Pennrose, have initiated the first two phases of development with the planning, financing, and development of Phase I as a 4-story, 60-unit apartment building with commercial space on the ground floor, and Phase II that consists of 50 townhouse units, which has received a 2014 award of 9% tax credits. Both phases will be mixed income with the subsidized units being part of the RAD program.

Mixed-finance Development projects

CMHA has now used the mixed-finance method to provide funding for thirteen development projects over the past few years and will continue to use this method for new development projects, including the conversion of public housing properties to the Rental Assistance Demonstration (RAD) program. The mixed-finance approach has primarily utilized Low Income Housing Tax Credits (LIHTC) through the State of Ohio, which have helped CMHA finance the following projects:

- Carver Park Phase I (279 units - RAD) will be financed with 4% LIHTC and a FHA loan – modernization of these units is scheduled to start in 2016
- Midwest Cluster (70 units – RAD) will be financed with 4% LIHTC and an FHA loan – new construction of 20 units and modernization of 50 units is scheduled to start in 2016
- Cedar Extension Phase II (50 units/30 RAD units) will be financed with 9% LIHTC, a FHA loan, and CFP funds – construction of these new units was scheduled to start in 2015
- Cedar Extension Phase I (60 units/49 RAD units) will be financed with 4% LIHTC, HOME loan, RHF and CFP funds – construction of these new units was scheduled to start in 2015
- Heritage View Phase IV (60 units - RAD) will be financed with 4% LIHTC, a FHA Loan, and RHF funds – construction of these new units was scheduled to start in 2015
- Bohn Tower (266 units - RAD) will be financed with 4% LIHTC, a FHA Loan, and RHF funds – renovation of these existing units was started in 2015
- Fairfax Intergenerational (40 units, which will be operated with project-based vouchers) was financed with 4% LIHTC and City funding – this new project was completed in 2014
- Miles Pointe (43 units) was financed with 9% LIHTC and Replacement Housing Factor (RHF) funds – this new building was completed in December 2013
- Lee-Miles Apartments (40 units) and Belmore-Euclid in East Cleveland (39 units) were financed through 4% LIHTC, NSP2, and RHF funds – these new buildings were completed in March 2013
- Heritage View Phase I (81 units) was financed with 4% LIHTC, CFFP, ARRA, and City funds – these new units were completed in January 2011
- Heritage View Phase II (57 units) was financed with 4% LIHTC, and ARRA funds – these new units were completed in July 2011
- Heritage View Phase III (69 units) was financed with 4% LIHTC, and ARRA funds – these new units were completed in March 2012
- Tremont Pointe Phase I (51 public housing units) was financed with 9% LIHTC and HOPE VI, and City funds – these new units were completed in November 2007

- Tremont Pointe Phase II (44 public housing units) was financed with 9% LIHTC and HOPE VI, and City funds – these new units were completed in October 2009
- Riverside Park Homes (90 units) was funded with 4% LIHTC and RHF funds – these new units were completed in November 2007 – RAD renovations in 2016 will be funded from a FHA loan

CMHA will consider other mixed-finance projects in 2016, including Central Choice (additional phases at Cedar Extension and Olde Cedar), Heritage View (Garden Valley) Phase V, additional RAD projects at Springbrook/Wade and Scattered Site houses, and/or other potential projects in the Downtown, Central, Glenville, Hough, Mt. Pleasant, Ohio City and other westside areas of Cleveland.

CMHA will continue to seek other development opportunities for creating replacement housing, such as the Housing Trust Fund if and when available. In recent years, a source of new funding for some replacement housing came from the **Neighborhood Stabilization Program (NSP) 2**, where CMHA as part of a consortium with the City of Cleveland, Cuyahoga County and the Cuyahoga County Land Reutilization Corp. won an award from HUD in 2009. CMHA played a key role in developing new low-income rental units in Cleveland target areas and East Cleveland as part of the rental project development aspect of the NSP2 plan. The development of 79 units (40 at Lee-Miles and 39 at Belmore Euclid) were completed in March 2013, and exceeded CMHA's commitment of 50 units.

Another source of public housing development or replacement activities available to CMHA is **Replacement Housing Factor (RHF)** funds, which are provided on a formula basis by HUD for demolished public housing units. CMHA has and will continue to employ a strategy of accumulating RHF funds until there is sufficient funding for larger development projects. CMHA has initiated plans to use RHF funds to develop new public housing units consisting of the acquisition and rehabilitation of four buildings (32 units) on Bellaire Road, the construction of Lee-Miles Apartments (40 units), Mildred Brewer/Belmore-Euclid (39 units), and Miles Pointe (43 units), and 3 new UFAS units on excess land at Walton Place and 6 new units at Woodland-East 115th St. (including 2 UFAS). CMHA will also use RHF funds to assist with construction of the new RAD projects at Cedar Extension, Heritage View, and Bohn Tower. Other potential plans utilizing RHF funds include the RAD conversions at Carver Park, Riverside Park and Midwest Cluster, the acquisition and rehabilitation of foreclosed Turnkey III Homeownership units, and scattered site units, in addition to the development of new public housing units in potential projects under discussion in the Central, Ohio City, Glenville, Hough, Mt. Pleasant, and Union-Miles neighborhoods of Cleveland, and East Cleveland. CMHA also will consider using RHF funds to assist in the proposed conversion of public housing properties at Springbrook, Wade, Oakwood, Lakeview Terrace/Tower and Scattered Sites to RAD.

CMHA will utilize its development entity, the **Western Reserve Revitalization and Management Company (WRRMC)**, for financing and ownership of mixed-finance development projects. Since 2004, WRRMC has been involved in providing low income housing tax credit financing for several development projects that have resulted in 663 new public housing units, plus an additional 83 units that are currently under development.

American Recovery and Reinvestment Act (ARRA) grants

In 2009, CMHA was awarded \$35 million of additional CFP funds under the American Recovery and Reinvestment Act (ARRA) that were utilized to fund six major projects: 1) Phases I and II of the Garden Valley redevelopment project; 2) ADA upgrades to modify 194 units including site improvements and common areas in accordance with VCA for years 1 (2009) and 2 (2010); 3) vacancy reduction of 133 units that have been in modernization status, including units in need of an electrical service upgrade at Outhwaite and structural repairs at Willson family; 4) roof replacements for 31 buildings at six properties; 5) demolition of one building at Outhwaite and replacing it with a new 36-unit building (Legacy Park), additional parking and green space; and 6) renovation and expansion of the long vacant Community Center building at Woodhill Homes. CMHA obligated all of these funds by the deadline of March 2010, completed all of the projects, and expended all of the funds by the expenditure deadline of March 2012.

In 2009, CMHA was also awarded an additional \$34.5 million in ARRA Capital Fund Recovery Competitive (CFRC) grants. CMHA received six competitive ARRA grants to make energy improvements at King Kennedy North High Rise, Willson High Rise, Addison Square, Woodhill Homes, Beachcrest, Bohn Tower, West Boulevard, Riverview Tower, and Bellaire Gardens. CMHA utilized this stimulus funding for several different work items, including replacing boilers and hot water heaters with high-efficiency condensing-type boilers, replacing clear tint metal frame windows with efficient insulated vinyl frame and low-E glass tint windows, replacing incandescent lighting with efficient compact fluorescent lamps, and adding water saving devices such as low flush toilets, low flow shower heads, and flow reducing aerators. These improvements will enable CMHA to improve indoor air quality, measure and verify energy consumption, and decrease energy costs at these properties. CMHA also received a seventh competitive grant for the development of Garden Valley Phase III, which involved the construction of 69 green ACC/LIHTC units, consisting primarily of two-story townhouse structures ranging from four to seven units each, along with single family detached homes. All of the funds were obligated and expended in the timeframes required to meet the HUD deadlines.

CMHA maintains **community center buildings** at several of the larger family properties, including Lakeview Terrace, Riverside Park, Outhwaite, King Kennedy, and Woodhill Homes. CMHA will seek funding to build a new community center at Heritage View (Garden Valley) and/or the Cedar Central AMP as part of any future redevelopment projects.

When necessary, CMHA will **acquire properties** for future development or expansion, including land bank lots on the west side for the RAD Midwest Cluster project and around Miles Elmerge for parking, the property located at 1408 East 89th Street, and sites in the Central area or other areas of Cleveland in order to meet the one-for-one replacement requirement under Choice Implementation and future RAD conversions. CMHA will also consider the acquisition of vacant and/or foreclosed homes previously sold from the Turnkey III Homeownership program that were part of clustered developments at Addison Townhouses, Mt. Auburn, Carson Wanda, and Fairville.

7.0 (b). Demolition and/or Disposition activities have occurred at several CMHA properties since 1995 resulting in the demolition of 2,073 units under HUD-approved plans. Through July 2015, CMHA will have demolished 628 units at Garden Valley, 610 units at Carver Park, 270 units at King Kennedy North, 243 units at Valleyview, 163 units at Outhwaite, 135 units at Riverview, 10 Scattered Site units, 6 units at Harvard-East 113th, 6 units at Riverside Park, and 2 units at Puritas Gardens. The demolition of Cedar Extension family (253 units) was completed in 2014. CMHA has no pending demolition applications as of July 2015, although demolition is part of two approved RAD applications at Midwest Cluster (20 units) consisting of 12 scattered townhouse units on West 58th Street and the 8 remaining family units at Riverview, and Carver Park Phase 2 (251 units in A&B area). During 2016, CMHA will consider developing **demolition plans** for up to five (5) additional scattered site houses through the de minimus process, old Boiler Plant buildings at Woodhill Homes and Lakeview Terrace (or possible disposition), a maintenance building at Outhwaite, one of the Homeownership Turnkey III units that was converted to Public Housing.). CMHA is also considering redevelopment projects that could result in demolition plans at Olde Cedar for up to 15 buildings (493 units), Lakeview Terrace for up to 7 buildings (116 units) located east of West 25th Street, and at Woodhill Homes for up to 13 buildings (94 units) identified as Village D in the Master Plan.

CMHA has approved **disposition plans** for the CMHA Headquarters building and vacant land on West 25th Street, and is in the process of transferring the remaining vacant land at Valleyview to the City of Cleveland for the Towpath Trail. CMHA is also planning to submit proposals for transferring land at Cedar Extension for developing tax credit housing, at Garden Valley for the mixed-finance development of Phases 4 and 5, and vacant lots from the demolition of houses in Scattered Sites to the City of Cleveland in exchange for other vacant lots. Other potential disposition actions include a small vacant section of Carver Park (in exchange for a vacant old school lot within Outhwaite), some excess vacant land at Outhwaite, several vacant scattered site

parcels, a small piece of vacant land at the Broadway/Worley Scattered Townhouses, some portion of the Riverview vacant land, and other parcels of vacant land along Superior Avenue.

<i>Demolition/Disposition Activity Description table</i>								
	<i>1a.</i>	<i>1b.</i>	<i>2.</i>	<i>3.</i>	<i>4.</i>	<i>5.</i>	<i>6.</i>	<i>7.</i>
AMP	Development	Dev#	Type	Status	Date	Effectuated Area		Timeline
901	Cedar Extension (Family)	OH003-011/023	Dispo	Planned	1/13	Vacant land	Part	1/13-12/16
901	Olde Cedar	OH003-014/088	Demo	Planned	1/15	493 units 15 bldgs	Part	1-12/16
902	Outhwaite	OH003-003	Demo	Planned	1/15	Maint. Bldg.	Part	1-12/16
902	Outhwaite	OH003-003	Dispo	Planned	1/15	Vacant land	Part	1-12/16
903	Carver Park	OH003-007	Dispo	Planned	1/15	Vacant land	Part	1-12/16
903	Carver Park (A&B)	OH003-007	Demo	Planned (RAD)	1/14	251 units 16 bldg	Part	1-12/16
905	Superior Terrace	OH003-076	Dispo	Planned	1/15	Vacant land	Part	1-12/16
906	Garden Valley (Heritage View)	OH003-13/19/27	Dispo	Planned	8/14	Vacant land	Part	1-12/16
907	Woodhill Homes	OH003-004	Demo	Planned	1/15	94 units 13 bldgs.	Part	1-12/16
907	Woodhill Homes	OH003-004	Demo	Planned	1/15	Maint. Bldg.	Part	1-12/16
908	Lakeview Terrace	OH003-016	Demo	Planned	1/15	116 units 7 bldgs.	Part	1-12/16
908	Lakeview Terrace	OH003-016	Demo/Dispo	Planned	1/15	Boiler Plant	Part	1-12/16
908	Administrative Headquarters	OH003-031	Dispo	Approved	6/12	1 Bldg & land	Part	8/13-12/16
909	Riverview	OH003-025	Demo	Planned (RAD)	1/14	8 units 1 bldg.	Part	1/14-12/16
909	Riverview	OH003-025	Dispo	Planned	1/15	Vacant land	Part	1-12/16
911	Scat. T'houses – Broadway/Worley	OH003-075	Dispo	Planned	1/15	Vacant land	Part	1-12/16
911	Scat. T'houses – West 58th	OH003-075	Demo	Planned (RAD)	1/14	12 units 6 bldgs.	Part	1/14-12/16
911	Scattered Sites	OH003-073,106	Demo	Planned <i>deminimus</i>	9/14	5 units	Part	9/14-12/16
911	Scattered Sites	OH003-073,106	Dispo	Planned	1/15	5 vacant parcels	Part	1-12/16
911	Scattered Turnkey	OH003-126	Demo	Planned	11/13	1 unit	Part	11/13-6/16
941	Valleyview	OH003-001	Dispo	Approved	9/11	Vacant land	Part	9/11-3/16

7.0 (c). Conversion of Public Housing requirement for mandatory conversions still does not apply to any CMHA property. The Required Initial Assessments for voluntary conversions were completed by October 1, 2001 for the applicable estates, and CMHA determined that none of the covered estates are appropriate for conversion.

Under HUD’s new **Rental Assistance Demonstration (RAD)** program, CMHA has received approval to convert several properties from the Public Housing program to Project-Based Rental Assistance (PBRA). As a result, CMHA will be converting the properties listed below to Project Based Rental Assistance under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Rental Assistance, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.7 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17).

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing CMHA with access to private sources of capital to repair and preserve its affordable housing assets. Upon conversion, the Authority’s Capital Fund Budget will be reduced by the pro rata share of Public Housing properties converted as part of the Demonstration, and CMHA may also borrow funds to address the capital needs of these properties. Depending on the extent of the capital expenditure required, CMHA may also be contributing Operating Reserves, Capital Funds, and/or Replacement Housing Factor (RHF) Funds towards the conversion. For applicable projects that currently have debt under the Capital Fund Financing Program and/or Energy Performance Contract, CMHA will work with the appropriate funding entity to address any outstanding debt issues, which may result in additional reductions of capital funds. Through the annual PHA Plan update process or as an amendment to the PHA Plan, CMHA has provided the following required information:

Approved RAD projects – HUD has issued Commitment to enter into a Housing Assistance Payment (CHAP):

- **Bohn Tower** – rehabilitation of existing public housing 22-story elderly high-rise building

<u>Name of PH Project:</u> Bohn Tower	<u>PIC Development#:</u> OH003000908	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 266	<u>Pre-RAD Unit Type:</u> Elderly (High-rise)	<u>Post-RAD Unit Type:</u> Elderly (High-rise)	<u>Capital Fund allocation:</u> \$497,790
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change -Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	266	266	No change
Two Bedroom			
Three bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	None		

- **Cedar Extension Phase I** – a new apartment building consisting of 60 (49 RAD) one bedroom units will replace seven rowhouse buildings

<u>Name of PH Project:</u> Cedar Ext. Phase I	<u>PIC Development#:</u> OH003000901	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 49	<u>Pre-RAD Unit Type:</u> Family (Rowhouse)	<u>Post-RAD Unit Type:</u> Family (Mid-rise)	<u>Capital Fund allocation:</u> \$91,700

<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom		49	+49
Two Bedroom	8		-8
Three bedroom	19		-19
Four Bedroom	22		-22
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	None		

- Cedar Extension Phase II – 50 (30 RAD) townhouse units will replace four rowhouse buildings

<u>Name of PH Project:</u> Cedar Ext. Phase II	<u>PIC Development#:</u> OH003000901	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 30	<u>Pre-RAD Unit Type:</u> Family (Rowhouse)	<u>Post-RAD Unit Type:</u> Family (Townhouse)	<u>Capital Fund allocation:</u> \$56,142
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	0	2	+2
Two Bedroom	6	18	+12
Three bedroom	14	7	-7
Four Bedroom	10	3	-7
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	None		

- Garden Valley Phase IV – a new 60-unit apartment building will replace six walkup/rowhouse buildings

<u>Name of PH Project:</u> Heritage View Phase IV	<u>PIC Development#:</u> OH003000906	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 60	<u>Pre-RAD Unit Type:</u> Family (Walkup/Row)	<u>Post-RAD Unit Type:</u> Family (Mid-rise)	<u>Capital Fund allocation:</u> \$112,283
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	15	60	+45
Two Bedroom	27		-27
Three bedroom	18		-18
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	None		

- Riverside Park Phase I – modernization of Riverside Park Homes, a public housing tax credit property built in 2007, consisting of a 28 unit elderly apartment building and 62 in-fill townhouse units

<u>Name of PH Project:</u> Riverside Park Phase I	<u>PIC Development#:</u> OH003000924	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 90	<u>Pre-RAD Unit Type:</u> Elderly (Mid-rise) and Family (Townhouses)	<u>Post-RAD Unit Type:</u> Elderly (Mid-rise) and Family (Townhouses)	<u>Capital Fund allocation:</u> \$168,425

<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	24	24	No change
Two Bedroom	10	10	No change
Three bedroom	38	38	No change
Four Bedroom	18	18	No change
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	None		

- Riverside Park Phase II – rehabilitation of 407 existing Riverside Park public housing units

<u>Name of PH Project:</u>	<u>PIC Development#:</u>	<u>Conversion Type:</u>	<u>Transfer of Assistance:</u>
Riverside Park Phase II	OH003000910	PBRA	No
<u>Total Units:</u>	<u>Pre-RAD Unit Type:</u>	<u>Post-RAD Unit Type:</u>	<u>Capital Fund allocation:</u>
407	Family (Townhouses)	Family (Townhouses)	\$761,655
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	35	35	No change
Two Bedroom	244	244	No change
Three bedroom	103	103	No change
Four Bedroom	25	25	No change
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	None		

- Midwest Cluster – includes three properties from the Scattered or Small AMP consisting of 12 units on West 58th that will be demolished and replaced, 6 units on West 57th and 10 units on Landon that will be rehabilitated, 34 units on West 101st from the Riverview Replacement AMP that will be modernized, and 8 units at Riverview family from the Near West AMP that would be demolished and replaced

<u>Name of PH Project:</u>	<u>PIC Development#:</u>	<u>Conversion Type:</u>	<u>Transfer of Assistance:</u>
Midwest Cluster	OH003000909 (8 units) OH003000911 (28 units) OH003000926 (34 units)	PBRA	No
<u>Total Units:</u>	<u>Pre-RAD Unit Type:</u>	<u>Post-RAD Unit Type:</u>	<u>Capital Fund allocation:</u>
70	Family (Townhouses and Mid-rise)	Family (Townhouses and Mid-rise)	\$130,997
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	34	34	No change
Two Bedroom			
Three bedroom	28	36	+8
Four Bedroom			
Five Bedroom			
Six Bedroom	8		-8
If performing a transfer of assistance:	None		

- Carver Park Phase I – modernization of the HOPE VI area (279 units) and rehabilitation of the MROP area (217 units), which consists of 63 buildings with a total of 496 units

<u>Name of PH Project:</u> Carver Park Phase I	<u>PIC Development#:</u> OH003000903	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 496	<u>Pre-RAD Unit Type:</u> Family (Townhouses)	<u>Post-RAD Unit Type:</u> Family (Townhouses)	<u>Capital Fund allocation:</u> \$928,210
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	40	40	No change
Two Bedroom	149	149	No change
Three bedroom	196	196	No change
Four Bedroom	101	101	No change
Five Bedroom	10	10	No change
Six Bedroom			
If performing a transfer of assistance:	None		

- Carver Park Phase II – demolition of the A&B Block area, which consists of 16 buildings and 251 units that will be replaced on and off site. There would be changes in the bedroom size of the units proposed for replacement, and there will be a plan for the transfer of assistance at the time of conversion.

<u>Name of PH Project:</u> Carver Park Phase II	<u>PIC Development#:</u> OH003000903	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 251	<u>Pre-RAD Unit Type:</u> Family (Walkup/Row)	<u>Post-RAD Unit Type:</u> Family (Townhouse)	<u>Capital Fund allocation:</u> \$469,720
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change - Bedroom Type:</u>
Studio/Efficiency			
One Bedroom	103	TBD	
Two Bedroom	84	TBD	
Three bedroom	44	TBD	
Four Bedroom	20	TBD	
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	A plan will be developed for units subject to transfer of assistance that would include any policy changes for eligibility, admission, selection, and occupancy.		

- Springbrook and Wade Apartments, which are part of the Hough AMP, are two 16-story highrise building and 4 maisonnette buildings located in close proximity to each other in the Hough area of Cleveland consisting of a total of 457 units (20 efficiencies, 373 one-bedroom and 64 two-bedroom). There would be no change in the number or bedroom size of the units proposed for conversion, and there is no plan for the transfer of assistance at the time of conversion. The converted project would utilize a site-based waiting list with only a preference for veterans.

<u>Name of PH Project:</u> Springbrook Wade	<u>PIC Development#:</u> OH003000905	<u>Conversion Type:</u> PBRA	<u>Transfer of Assistance:</u> No
<u>Total Units:</u> 442	<u>Pre-RAD Unit Type:</u> Family (High-rise)	<u>Post-RAD Unit Type:</u> Family (High-rise)	<u>Capital Fund allocation:</u> \$827,154
<u>Bedroom Type:</u>	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	<u>Change -Bedroom Type:</u>
Studio/Efficiency	14	14	No change

One Bedroom	368	368	No change
Two Bedroom	60	60	No change
Three bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a transfer of assistance:	None		

Planned RAD projects:

CMHA is considering the conversion of three additional property groupings from the Public Housing program to Project-Based Rental Assistance (PBRA):

- Scattered Site Houses, which are part of the Small or Scattered AMP, are located mostly in neighborhoods on the west side of Cleveland. CMHA is planning to identify a cluster of 140 units composed of single family and duplex houses for conversion to RAD. Although they would be rehabilitated according to need, there would be no changes in the bedroom size of the units proposed for conversion and possible replacement, and there is no plan for the transfer of assistance at the time of conversion. The converted project would utilize a site-based waiting list with only a preference for working families (includes elderly and disabled) and veterans.
- Garden Valley Phase V and Oakwood, which are part of the Southeast AMP, would consist of two separate projects. Garden Valley Phase V is in the Kinsman area of Cleveland and would be new construction of 51 townhouse units built on several vacant parcels from the Garden Valley demolition consisting of 9 one-bedroom, 30 two-bedroom, and 12 three-bedroom units. This new project would utilize a site-based waiting list with preferences for working families (includes elderly and disabled) and veterans. Oakwood is a southeastern suburb of Cleveland where CMHA owns and would renovate an elderly designated development (Villas) of 10 rowhouse buildings consisting of 92 units (91 one-bedroom and 1 two-bedroom) and an adjacent development of 25 single family three-bedroom units (Gardens). There would be no change in the number or bedroom size of the units proposed for conversion, and there is no plan for the transfer of assistance at the time of conversion. The converted Gardens project would utilize a site-based waiting list for working families (includes elderly and disabled) and veterans, and the Villas project would utilize a preference for the elderly and veterans.
- Lakeview Terrace and Tower, which are part of the Downtown AMP, are located on the near west side of Cleveland in the Ohio City neighborhood. The Terrace consists of 44 rowhouse and walkup buildings consisting of 506 units (140 one-bedroom, 212 two-bedroom, 132 three-bedroom, 16 four-bedroom, 2 five-bedroom, and 4 six-bedroom), and the Tower is a 19-story highrise building consisting of 213 units (211 one-bedroom and 2 two-bedroom). There would be changes in the bedroom size of the units proposed for conversion and possible replacement, and there would be a plan for the transfer of assistance at the time of conversion if needed. The converted project would utilize a site-based waiting list with only a preference for working families (includes elderly and disabled) and veterans.

All of CMHA’s RAD conversions will be to Project Based Rental Assistance (PBRA), and will include the following tenant protections, as required under Section 1.7 of PIH Notice 2012-32, REV-2 and the Joint Housing PIH Notice H-2014-09/PIH-2014-17:

- Right to return and Relocation Assistance
- No re-screening of tenants upon conversion
- Under-Occupied Unit
- Phase-in of tenant rent increase

- FSS and ROSS-SC programs
- Resident Participation and Funding
- Termination notification
- Grievance process
- Earned Income Disregard
- Jobs Plus
- When Total Tenant Payment Exceeds Gross Rent
- Establishment of Waiting List
- Choice Mobility

7.0 (d). Homeownership. Since 1971, CMHA operated a Turnkey III Homeownership (lease-purchase) program, which has now been closed out. Of the 385 original units, the last 27 unsold homes were converted to the public housing program in 2011, and have been added to the Scattered Site AMP. To help address a housing need identified in our housing needs analysis, CMHA implemented a HCVP homeownership program in 2003. As of July 2015, 85 families have purchased homes through the HCVP program.

7.0 (e). Project-based Vouchers. CMHA operates a Project-based Voucher (PBV) Program utilizing tenant-based vouchers to encourage property owners to construct new standard housing (new construction) or to upgrade substandard rental housing stock (substantial rehabilitation) and make it available to lower income families in the community. As of July 2015, a total of nine projects, representing 335 units, were under PBV contracts, and an additional two PBV projects (PIRHL and YWCA) with 28 units were in process of coming on line. The HCVP maintains a Project-based Voucher waiting list from which potential tenants of PBV units at CNC II, Educator Apartments and Historic Newton must be referred to the owners of these projects. In addition, the HCVP has opened a Permanent Supportive Housing Project-Based Site-Based Waiting List with a preference for chronically homeless applicants from which potential tenants of the Greenbridge Commons, Northridge, Buckeye Square, and South Pointe projects must be referred to the owners of these projects. Other project-based units are available at Front Steps for homeless families and at Griot Village (Fairfax Intergenerational) for adults age 55 and older with custody of minor children.

CMHA seeks to make affordable housing available to specific demographic groups through the PBV program. It is the intention of CMHA to serve segments of the low income population with unique needs that may not be met through more traditional assisted housing models.

Project-based voucher assistance provided by CMHA will be consistent with HUD regulations, which include some of the following provisions: 1) it is capped at 25% of the dwelling units in any one project except for single family properties (dwelling units specifically for elderly families, families with disabilities, or families under a supportive services agreement are not counted toward the cap); 2) project-based assistance may be provided for a term of up to 15 years, subject to the future availability of appropriated funds; and 3) administrative requirements exist for issues concerning rents, tenant selection, family choice to move, vacant units, unit inspection and housing quality standards.

8.0 Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the *Capital Fund Program Annual*

Statement/Performance and Evaluation Report, form HUD-50075.1, for each current and open CFP grant and CFFP financing.

- In the Final Rule for the Public Housing Capital Fund Program, issued October 24, 2013, HUD decoupled the review and submission of Capital Fund documents from the PHA Plan. Although the 2016 Capital Fund Annual Statement and Five-Year Plan will be submitted separately during 2016, CMHA has developed a draft 2016 CFP Annual Plan for review and comment during the 2016 PHA Plan process, and includes the following items:
 - Agency-wide site improvements, including fence repairs, sidewalk replacements, landscaping, and playground improvements.
 - Agency-wide dwelling structures, including extraordinary maintenance, stairwell repairs, window screen replacements, window repair and replacement, and ADA upgrades and repairs for reasonable accommodations
 - Dwelling structure improvements at the following AMPs:
 - 902 – masonry/envelope and structural repairs at Outhwaite
 - 903 – tuck-pointing at Carver Park
 - 904 – structural issues at Phoenix Village
 - 905 – masonry repairs at Willson family
 - 906 – envelope repairs at Union Square
 - 906 – envelope repairs and unit repairs at Miles Elmerge
 - 907 – elevator replacement at Euclid Beach
 - 907 – generator replacements at Beachcrest and LaRonde
 - 907 – plumbing at Woodhill Homes
 - 908 – masonry/envelope and unit repairs at Lakeview Terrace
 - 908 – envelope repairs at Lakeview Tower
 - 909 – generator replacements at Crestview, Manhattan, and Park Denison
 - 909 – elevator upgrades and common area improvements at Riverview Tower
 - 911 – comprehensive renovations at various Scattered Sites
 - Dwelling equipment – appliances
 - Agency-wide non-dwelling structures, including plumbing, electrical, and structural repairs to various community and daycare facilities
 - Non-dwelling equipment
 - Resident relocation costs
 - Annual debt service on two Capital Fund Financing Program (CFFP) bond leveraging projects
- After Public Housing projects are finally converted to RAD, there will be a proportional reduction in the amount of CFP funds that CMHA will receive. Based on the 2015 CFP allocation level, CMHA has estimated the CFP allocation amounts for future years would be reduced for approved RAD projects as follows:
 - the 2016 CFP allocation by \$497,790 (266 units)
 - the 2017 CFP allocation by \$1,985,544 (1,061 units)
 - the 2018 CFP allocation by \$3,216,918 (1,719 units)

8.2 Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the *Capital Fund Program Five-Year Action Plan*, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.

- In the Final Rule for the Public Housing Capital Fund Program, issued October 24, 2013, HUD decoupled the review and submission of Capital Fund documents from the PHA Plan. Although the 2016 Capital Fund Annual Statement and Five-Year Plan will be submitted separately during 2016, CMHA also developed a draft 2016 CFP Five-Year Plan for review and comment during the 2016 PHA Plan process.

- After Public Housing projects are finally converted to RAD, there will be a proportional reduction in the amount of CFP funds that CMHA will receive. Based on the 2015 CFP allocation level, CMHA has estimated the CFP allocation amounts for future years would be reduced for approved RAD projects as follows:
 - the 2016 CFP allocation by \$497,790 (266 units)
 - the 2017 CFP allocation by \$1,985,544 (1,061 units)
 - the 2018 CFP and beyond allocation by \$3,216,918 (1,719 units)
- The 2015 CFP Five-Year Plan (HUD Form 50075.2) was approved by HUD on 11/21/2014.

8.3 Capital Fund Financing Program (CFFP).

Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.

- CMHA has leveraged a portion of its annual CFP grant funds to finance additional development/modernization activities through the Capital Fund Financing Program (CFFP).
 - In 2007, CMHA realized \$14 million from a bond-leveraging project with the Ohio Housing Finance Agency to fund the modernization of 66 units at Lakeview Terrace, balcony repair and window replacement at Olde Cedar, replacement of roofs at Olde Cedar, and major elevator repairs at several properties.
 - In 2009, CMHA realized \$19.5 million from a bond-leveraging project with Fannie Mae to fund Garden Valley Phase I, the modernization of building #1 at Outhwaite, and ADA upgrades at Carver Park, Riverside Park, King Kennedy South, Willson, Scranton Castle, and West Boulevard to modify units and common areas and make site improvements in accordance with the VCA.
- The remaining 2009 CFFP debt associated with Riverside Park that will be paid off at conversion to RAD will decrease the annual debt service payment from the Capital Fund by approximately \$60,000.

9.0 Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

The Housing Needs analysis in conjunction with the provisions set forth in the Quality Housing and Work Responsibility Act (QHWRA) help establish the basis for the PHA Plan. The needs analysis is based upon information provided in the Consolidated Plans prepared by entitlement cities within our jurisdiction and 2010 census data.

Although Cuyahoga County consists of 38 cities, 19 villages, and 2 townships, planning in Cuyahoga County is unique in that a housing consortium (Cuyahoga Urban County) comprised of 46 of these communities have joined forces in analyzing their housing needs to be combined into one Consolidated Plan, which also includes information for the entitlement cities of Cleveland Heights, Euclid, Lakewood, and Parma. The City of Cleveland and the City of East Cleveland prepare individual plans and are not part of the consortium.

9.1 Strategy for Addressing Housing 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. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.

In the City of Cleveland there are 38,589 renter households earning less than or equal to 30% AMI. Of these households, 67% (25,774) use 30% or more of their income to cover the cost rent. In the Cuyahoga Urban County, which comprises most of the suburban population, there are 19,700 renter households earning less than or equal to 30% AMI. Of these households, 87% (17,187) use 30% or more of their income to cover the cost rent.

<i>Percentage of Renters Earning Less than or Equal to 30% AMI with a Cost Burden of >30%</i>		
Low Income Renter Households	City of Cleveland	Cuyahoga Urban County
Elderly	4,494	4,280
Small Related	10,420	5,266
Large Related	3,280	863
All Other	7,580	6,778
Total Renter Households with Cost Burden >30%	25,774	17,187
Total Renter Households Earning <= 30% AMI	38,589	19,700
Low Income Renter Households with Cost Burden > 30%	67%	87%

The supply and quality of units available to lower-income renters is also a serious concern. Cuyahoga County’s housing stock, particularly those units within the central city and the inner-ring suburbs, is aging and the quality of rental housing is often poor. The housing needs study also indicates that the supply and quality of affordable rental housing for families with disabilities is limited, and that there is a need for assisted and supportive services rental units for elderly families.

CMHA has adopted the following strategies to help alleviate this huge need for safe decent affordable housing in Cleveland and Cuyahoga County:

- Maximize the number of available assisted housing units by maintaining a minimal vacancy rate in the Public Housing program and a high utilization rate in the Housing Choice Voucher program
- Increase the supply of assisted housing units by developing new public housing units and applying for new vouchers as made available
- Upgrade the Public Housing stock through the effective expenditure of Capital Funds
- Achieve the 5% goal of fully accessible ADA public housing units through implementation of the Voluntary Compliance Agreement with HUD
- Collaborate and continue support of initiatives that provide housing for homeless and special needs households through the Housing Choice Voucher program
- Continue to provide housing dedicated to the needs of elderly persons by maintaining the designation of certain public housing properties through the Designated Housing Plan for the Elderly with HUD
- Maintain a CMHA Police force to enhance the safety of public housing properties
- Provide economic opportunities for residents through provision of social service programs and Section 3 component of construction contracts

10.0 Additional Information. Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

10.0 (a). Progress in Meeting Mission and Goals.

For Five-Year Plan of 2015-2019 through July 2015:

1. Public Housing program:

- maintained vacancy rate adjusted for modernization at less than 3% as of 6/30/15
- maintained standard performer designation under PHAS with score of 79% for 2013 under new PHAS scoring system
- submitted Choice Neighborhood Implementation application for redevelopment of Cedar AMP
- of the 2,326 units that have been demolished as of July 2015, CMHA has committed to 1,888 replacement units of which 1,638 units have been completed and another 139 are in progress
- completed commitment of 458 fully accessible units to UFAS standards to meet VCA agreement
- advanced effort to institute document imaging for applications process
- performed review of ACOP policies and made changes annually for 2015
- enhanced community image with many positive media stories, including Griot Village

2. Housing Choice Voucher (Section 8) program:

- maintained high-performer rating for 10th straight year from HUD with SEMAP score of 100% in 2014
- added 149 new vouchers in past year
- increased VASH vouchers to 508 (from 375) in 2015
- awarded 100 Project-based Vouchers for chronically homeless projects
- advanced effort to institute document imaging for department
- performed review of Administrative Plan policies and updated them annually for 2015
- continued to build relationships with local municipalities by sharing information through quarterly and weekly reports and addressing specific issues as they arise
- maintained high enrollment in voucher FSS program and expanding program to include Public Housing
- increased sales in HCVP Homeownership program to 85 as of 6/30/15
- opened wait list in 2015 and conducted successful on-line application process with over 50,000 responses from which 10,000 applicants were chosen through a lottery
- developed a dashboard reporting tool to manage program more efficiently and effectively

3. Rental Housing Demonstration (RAD)/Section 8 New Construction (S8NC) program:

- completed conversion of Bohn Tower to RAD
- created separate management division for RAD and S8NC programs
- implemented 4% Low Income Housing Tax Credits for RAD projects at Bohn Tower (266 units), Heritage View (Garden Valley) Phase IV (60 units), Cedar Extension Phase I (60 units)
- submitted 4% Low Income Housing Tax Credits applications for RAD projects at Carver Park Phase I and Midwest Cluster

10.0 (b). Significant Amendment and Substantial Deviation/Modification.

This section was added to the PHA Plan in 2001 and defines what significant amendments or deviations to the Plan would require resubmission of the Plan. While housing authorities may change or modify their plans and policies described in them, any "significant amendments or modification" to the plan will require the submission

of a revised Agency Plan that has met the full public process requirement. CMHA will consider the following actions to be significant amendments or modifications:

- Changes to rent or admissions policies or organization of the waiting list;
- Additions of non-emergency work items (items not included in the current Annual Statement or 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund;
- Additions of new activities not included in the current PHDEP Plan; and
- Any change to the Capital Fund (CFP) 5-Year Action Plan for a proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed-finance proposal.

The following items will be excluded from these significant amendment actions:

- Actions due to changes in HUD regulatory requirements;
- Changes to the Capital Fund budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- Changes to the financing structure for each approved RAD conversion.

HUD also requires that housing authorities explain “substantial deviations” from the 5-Year Annual Plan in their Annual Plan. “Substantial deviations” to CMHA’s 5-Year Plan shall consist of the elimination of a goal or objective without being completed or a significant change to a goal or objective, represented by more than a one year change to the completion date or more than a 30% reduction of an objective activity amount.

10.0 (c). Agreements with HUD.

Voluntary Compliance Agreement (VCA): in March 2007, the HUD Office of Fair Housing and Equal Opportunity, conducted a review of CMHA’s compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA). HUD’s compliance review included an examination of CMHA’s LIPH application and resident files, waiting lists, reasonable accommodation requests, transfer requests, and maintenance records, as well as an accessibility review of the Administrative Office and Applications Office. HUD also reviewed a sample of eight public housing developments and conducted physical surveys of 31 dwelling units, including the designated accessible routes and access to common areas. HUD also conducted interviews with CMHA senior management staff, development managers, and residents.

Based on their review, HUD determined that CMHA was not in compliance with Section 504 or the ADA. HUD issued a Letter of Findings of Noncompliance on September 28, 2007 specifying the areas of non-compliance noted by HUD in their review. CMHA voluntarily chose not to appeal or seek a review of HUD’s findings, as was its right to do. CMHA and HUD then participated in multiple collaborative good faith negotiation sessions that resulted in a seven year Voluntary Compliance Agreement (VCA), which was executed on July 25, 2008.

The VCA was completed according to schedule in July 2015, and will provide disabled residents of Cleveland with additional opportunities to access affordable housing by making five percent (5%) of its public housing units fully accessible for residents and applicants with disabilities. Under the agreement, CMHA:

- Created a minimum of five percent (initially 482 units, but revised to 458 based on 2015 level of public housing units) of its housing stock into fully-accessible units that will include lower kitchen counters, ramps, grab bars, and other features of accessible design;
- Made improvements in the management of their housing wait list to maximize the availability of accessible units for disabled individuals and their families;
- Ensured that applicants and residents with disabilities who rely on assistance animals have equal, unrestricted access to CMHA’s programs; and
- Trained employees about the responsibilities and procedures created under this agreement.

The VCA also set forth specific reporting and recordkeeping requirements, which will enable CMHA to track compliance with the mandates set forth in the VCA. In addition, CMHA agreed, as part of its overall efforts to provide affordable, accessible housing to persons with disabilities in its serving communities, to become an active coordinating agency in the Money Follows the Person Rebalancing Initiative (the MFP Initiative) funded through the Centers for Medicare and Medicaid Services (CMS). The goal of the MFP Initiative is to expand accessible, affordable and integrated housing options for persons with disabilities and seniors to promote the transition of these individuals out of institutional settings and into home and community-based settings. CMHA works with the local MFP Initiative network (Ohio Home Choice) to facilitate applications by or on behalf of disabled individuals eligible for participation.

11.0 Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.

11.0 (a). PHA Certifications of Compliance with the PHA Plan and Related Regulations (HUD-50077) & Civil Rights Certification (HUD-50077-CR)

– attachment oh003a01

11.0 (b). Certification for a Drug-Free Workplace (HUD-50070)

– attachment oh003b01

11.0 (c). Certification of Payments to Influence Federal Transactions (HUD-50071)

– attachment oh003c01

11.0 (d). Disclosure of Lobbying Activities (SF-LLL)

– attachment oh003d01

11.0 (e). Disclosure of Lobbying Activities Continuation Sheet (SF-LLL-A)

– not applicable

11.0 (f). Resident Advisory Board (RAB) Comments

The Executive Committee of the Progressive Action Council (PAC), which acts as the RAB was informed of the changes being proposed to the FY2016 PHA Plan, the Admissions and Continued Occupancy Policy (ACOP), and the HCVP Administrative Plan and was provided with documents for their review and comment.

CMHA received a letter from the RAB stating: “that after a careful review of the proposed amendments to the Public Housing Agency Plan for FY2016, we are in full support of the amendments.”

11.0 (g). Challenged Elements (of PHA Plan).

The following is a summary of the comments that were received verbally and/or in writing during the public review process for the FY2016 PHA Plan, including the CMHA response. In addition to the Public Hearing held on September 30, 2015, CMHA also held meetings with our community partners to discuss the proposed changes.

Written comments were submitted by the Legal Aid Society, the Office of Homeless Services, EDEN, Inc. and the Housing Research and Advocacy Center.

A. Public Housing Agency (PHA) Plan comments:

1. Section 6.01 Eligibility, Selection and Admission Policies

Comment: Create a new high preference for homeless families with children, who had received Rapid Re-housing Assistance for 6 to 12 months, and who had been determined through intensive case management interventions to need a long term subsidy. The Cuyahoga County Continuum of Care is committed to ending homelessness for families, and this would assist in the strategy to accomplish this goal by providing long term subsidies only to those families with the highest barriers to housing stability. The Cuyahoga County CoC has data tracking that confirms for all families who engage in Rapid Re-Housing (RRH) through the Progressive Engagement model, 75% of the families will achieve housing stability with only the short term intervention of 4 months of assistance. Of the remaining 25%, 10 to 15% will remain stably housed through additional, but time limited, assistance. The remaining 10 to 15% will be allocated a permanent subsidy whether through the CoC HEARTH Act funding, or CMHA Public Housing access. On an annual basis, the number of referrals to CMHA Public Housing utilizing the High priority preference would not be expected to exceed 80 households. Proposed language: Public Housing program preferences will consist of high priority preferences for: g) literally homeless families, referred and verified by Coordinated Assessment & Intake. [Office of Homeless Services]

Response: Agree. A new high priority public housing preference will be implemented for “Homeless Families with Children, who have been referred and verified by Coordinated Assessment & Intake.”

2. Section 6.03 Rent Determination

Comment: HUD issued PIH Notice 2015-13 on September 8, 2015 that allows housing authorities to utilize Small Area Fair Market Rents (SAFMR) in place of regional FMR as the basis for calculating Public Housing flat rents. CMHA staff determined that this would create a more equitable flat rent amount for many of the public housing properties located in lower income neighborhoods and recommends making this change. [CMHA Staff]

Response: Agree, CMHA will adopt the SAFMR as the basis for determining flat rents in the public housing program.

3. Section 7.0 (a) Mixed Finance, Modernization or Development

Comment: To ensure that it is sufficiently documented for a potential acquisition plan, add that CMHA will acquire vacant lots near Miles Elmerge for parking lot expansion. [CMHA Staff]

Response: Agree, it will be added.

4. Section 7.0 (c) Conversion of Public Housing

Comment: With HUD approval on September 4, 2015 of the Springbrook-Wade RAD conversion request, the status of this project should change from a pending application to an approved project. [CMHA Staff]

Response: Agree, it will be changed.

B. Admissions and Continued Occupancy Policy (ACOP) comments:

1. Section 2.09 – Implementing Preferences in Tenant Selection

Comment: Create a new high preference for homeless families with children, who had received Rapid Re-housing Assistance for 6 to 12 months, and who had been determined through intensive case management interventions to need a long term subsidy. The Cuyahoga County Continuum of Care is committed to ending homelessness for families, and this would assist in the strategy to accomplish this goal by providing long term subsidies only to those families with the highest barriers to housing stability. The Cuyahoga County CoC has data tracking that confirms for all families who engage in Rapid Re-Housing (RRH) through the Progressive Engagement model, 75% of the families will achieve housing stability with only the short term intervention of 4

months of assistance. Of the remaining 25%, 10 to 15% will remain stably housed through additional, but time limited, assistance. The remaining 10 to 15% will be allocated a permanent subsidy whether through the CoC HEARTH Act funding, or CMHA Public Housing access. On an annual basis, the number of referrals to CMHA Public Housing utilizing the High priority preference would not be expected to exceed 80 households. Proposed language: Public Housing program preferences will consist of high priority preferences for: g) literally homeless families, referred and verified by Coordinated Assessment & Intake. [Office of Homeless Services]

Response: Agree. Under 2.09 B.1., a new high priority preference will be added for “Homeless Families with Children, who have been referred and verified by Coordinated Assessment & Intake.” A new sub-section will also be added: *“Homeless Families with Children: The verification for qualifying homeless families will be based on documentation of homelessness from the Administrator of Coordinated Assessment and Intake for the Homeless System.”*

2. Section 2.09 H - Preference for Homelessness

Comment: The verification process for homelessness should be based on documentation of homelessness from the Administrator of Coordinated Assessment and Intake for the Homeless System. [Office of Homeless Services]

Response: Agree. New wording *“Verification process for homelessness will be based on documentation of homelessness from the Administrator of Coordinated Assessment and Intake for the Homeless System, and recognized Homeless organizations or Social Service Agencies that serve the homeless population.”*

3. Section 2.13 & Glossary – Definition of Hate Crime

Comment: The definition of “hate crime” should be amended to include gender identity and sexual orientation as qualifying bases for protection in accordance with *The Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009* and the *Cuyahoga County Sheriff’s Department Ethnic Intimidation and Hate Crime Policy 203*. Further, “religion” should be inserted in the definition of “hate crime” where it appears in the ACOP Glossary as it appears in Section 2-13. [HRAC]

Response: Agreed. New wording *“Hate crime, meaning actual or threatened physical violence or intimidation that is directed against an applicant or family member, or applicant’s property, and that is based on the person’s race, color, religion, sex, national origin, disability, gender identity, sexual orientation or familial status.”*

4. Section 2.22 A.2.b – New section (“The family demonstrates that accepting the unit offer will place a family member’s life, health, or safety in jeopardy. The family should offer documentation such as restraining orders, other court documents, or risk assessments related to witness protection from a law enforcement agency. Reasons must be specific to the family. Refusals due to location alone, do not qualify as good cause.”)

Comment: The Housing Center supports the addition of this section affirming VAWA-related refusals constitute good cause refusals; however, the requirement that an applicant meet a higher standard, specifically, the requirement to provide documentation from a law enforcement agency, than required by VAWA (which permits self-certification as a victim of domestic violence, dating violence, sexual assault, or stalking) may deprive an applicant of a right afforded by VAWA. Suggested change: ... from a law enforcement agency *when available; however, self-certification through the use of Form HUD-50066 is also acceptable* ... [HRAC]

Response: This section applies to unit offers for applicants. CMHA provides protections to residents as required under VAWA.

5. Section 4.07 C – Unit Offers

Comment: CMHA proposes to remove from the ACOP the language which allows a family that has disagreed with an offer of a unit based on objective criteria the right to request an informal review of the determination. CMHA should retain the existing policy and keep the language that allows a family the right to request an informal review when the family has an objective reason for disagreeing with an offer. [Legal Aid Society]

Response: This section of the ACOP refers to residents receiving unit offers for Transfers. Residents would follow the Grievance Procedure if they disagree with the decision. There is a similar section in Chapter 2 for applicants, who would use the informal hearing process.

6. Section 5.11 B – Absence from the Unit

Comment: CMHA proposes to increase the allowed amount of time that a lessee may be away from her unit, with the AMP Leader's written consent, from 60 days to 90 days. CMHA should adopt this policy. [Legal Aid Society]

Response: Agree.

7. Section 7.02 – Grounds for Termination of Tenancy

Comment: Grounds for Termination of Tenancy by the CMHA provides that CMHA will terminate tenancy and/or evict a family when “any member of the household” or “a household member” engages in drug-related or other criminal activity. Tenants with disabilities requiring live-in aides, therefore, may be subject to termination of tenancy and/or eviction because of the actions of their live-in aide. The Housing Center recommends that the ACOP be revised to require removal of the offending live-in aide in such circumstances in lieu of termination of tenancy and/or eviction so that the assisted household can retain their housing and designate a new live-in aide. [HRAC]

Response: Agree. Section 7.02 H.3. will be changed to: “*CMHA may bifurcate the lease in order to evict, remove, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant. In the event the household member is a Live-in Aide, a tenant with disabilities requiring live-in aide will have the option to remove the offending live-in aide in lieu of termination of tenancy and/or eviction.*”

8. Section 9.07 B – Unit Offer, Rejection, and Acceptance

Comment: CMHA proposes to increase the response time for a family contacted for an offer of a unit from seven days to ten days. This proposed change is commendable and should be adopted. [Legal Aid Society]

Response: Agree.

9. Section 13.04 – Limited English Proficiency (LEP)

Comment: CMHA proposes to implement a Language Assistance Plan (LAP) consistent with the federal guidelines issued by HUD. This proposed addition is commendable and should be adopted. In order to ensure that meaningful access for persons who are Limited English Proficient, the ACOP policy should specify that all vital documents are provided in translation. [Legal Aid Society]

Response: Agree. CMHA provides a number of vital documents in translation. All documents are available for translation as indicated using the tagline.

10. Section 14.01 B – Reasonable Accommodation/Modification Policy

Comment: CMHA proposes that when a requested accommodation or modification is denied due to a fundamental alteration in the nature of the program, the undue financial or administrative burden, or the request is neither reasonable nor necessary, that CMHA will attempt to make an alternative accommodation or modification. In order to most effectively address the request, CMHA should consider a policy that requires the involvement of the person with the disability in determining an alternative accommodation or modification. For example, when an accommodation or modification request is denied, CMHA could meet with the person to discuss alternative options. This involvement is included in Section 14.03 B, but should be included in the Section 14.01 B as well. [HRAC]

Response: The only changes proposed in this section include replacing the word “individual” with “person” and clarifying that the Authority will make both accommodations and modifications where reasonable and necessary. The ACOP is merely an expression of policy and does not contain all the measures required by law

or by sound business practice. As a matter of course, the Authority's Section 504/ADA Team engages with clients to determine suitable alternatives. See also the response to the next comment.

11. Section 14.01 B – Reasonable Accommodation/Modification Policy

Comment: “If a person with a disability requires an accommodation or a modification such as an accessible feature or a change to a CMHA policy, CMHA will provide it unless doing so would result in a fundamental alteration in the nature of the program, pose an undue financial and administrative burden, or would be neither reasonable nor necessary. In such a case, CMHA will attempt to make an alternative accommodation or modification that will not result in a financial and administrative burden or be either unreasonable or unnecessary.” The *Joint Statement on Reasonable Accommodations* issued by HUD and the DOJ encourages housing providers to engage the requester of an accommodation in an “interactive process” if the requested accommodation is unreasonable to determine the requester’s disability-related need and possible alternatives. Accordingly, the Housing Center suggests amending the above section to include a reference to the interactive process to assure that this step is consistently taken before a denial of the requested accommodation/ modification is issued. Failure to engage in the interactive process prior to determination when this occurs (in instances when the accommodation/modification must be denied) disadvantages and unduly burdens the requester by requiring that they appeal a denial rather than engage in a dialogue to determine an alternative that might meet their needs. As CMHA staff have indicated (in the 9/15/15 meeting to discuss these proposed changes) that it is CMHA’s custom to engage in the interactive process prior to issuing a determination, we recommend it be noted here within the Reasonable Accommodation/Modification Policy. Amending the last line of the proposed language for 14.04B to read “and there are no other appropriate solutions identified through the interactive process.” will further emphasize CMHA’s policy of engaging in a discussion with the requester of an accommodation/modification before denying the request in instances where the requested accommodation/modification cannot be approved. [HRAC]

Response: CMHA proposes the last sentence as: In such a case, CMHA will engage the person making the request in an interactive process in an attempt to make an alternative accommodation or modification that will not result in a financial and administrative burden or be either unreasonable or unnecessary.

12. Glossary – Definition of Immediate Family Member

Comment: The term “Immediate Family Member” as defined within the ACOP does not include co-head of household or significant other. This definition should be updated to conform to revisions made previously to other sections to comply with HUD LGBT Rule and the updated “family” definition at 24 CFR 5.403. [HRAC]

Response: Agree. New wording “*with respect to a person, a spouse, a co-head, significant other, parent, brother or sister, or child of that person, or an individual to whom that person stands in loco parentis; or any other person living in the household of that person regardless of actual or perceived sexual orientation, gender identity, or marital status.*”

C. HCVP Administrative Plan comments:

1. Chapter 1, Page 13 – Reasonable Accommodation Policy

Comment: The Housing Center recommends augmenting the Reasonable Accommodation policy within the Administrative Plan, as applicable, to provide participants more information on their right to reasonable accommodation from CMHA in its administration of the Housing Choice Voucher Program. [HRAC]

Response: The Authority, through other documents, makes available specific information to Applicants, Participants, and the community generally describing the right to reasonable accommodations and the process for requesting them.

2. Chapter 1, Page 19/20 – Family Outreach

Comment: The Family Outreach section on pages 19-20 of the Admin Plan should be amended to include language affirming CMHA’s outreach includes that to persons with disabilities and to community organizations serving the needs of persons with disabilities in accordance with 24 C.F.R. §8.28(a)(1). [HRAC]

Response: Agree, this section will be amended as follows: *“To reach persons who cannot read the newspapers, or persons with sight impairments, the PHA will distribute fact sheets to the broadcasting media, and initiate personal contacts with members of the news media and community service personnel. The PHA will also utilize public service announcements.”*

3. Chapter 1, Page 20/21 – Owner Outreach

Comment: The Owner Outreach section on pages 20-21 of the Admin Plan should be amended to outline actions CMHA takes to recruit owners with accessible units to participate in the Program in accordance with 24 C.F.R. §8.28(a)(2). [HRAC]

Response: As the Code of Federal Regulations requires housing authorities to “encourage” rather than “recruit,” CMHA will continue to encourage landlords with accessible units to participate.

4. Chapter 2, page 30 – Denial of Admission

Comment 1: Prohibition of Applicant raised to 5 years for eviction from a Federally assisted housing for drug-related crime CMHA proposes to raise the number of years that an applicant is prohibited from admission to the HCVP from three to five years from the date of an eviction if a household member has been evicted from federally assisted housing for drug-related criminal activity. CMHA should retain the existing policy and keep the prohibition from admission at three years. The existing policy is consistent with the federal regulations. Pursuant to 24 CFR 982.553, the PHA must prohibit admission to the program of an applicant for three years from the date of eviction if a household member has been evicted from federally assisted housing for drug-related criminal activity. [Legal Aid Society]

Comment 2: “CMHA must prohibit admission to the program of an application for *five* years from the date of an eviction if a household member has been evicted from Federally assisted housing for drug-related criminal activity.” CMHA staff indicated that HUD program regulations required the change from three years to five years and, upon our inquiry, agreed to verify this requirement. Online resources appear to indicate only three years are required. Accordingly, we recommend this proposed change be stricken and that the current requirement of prohibiting admission for three years remain. [HRAC]

Response: Agree, this proposed change has been withdrawn.

5. Chapter 4, Page 44 – Other Admissions

Comment: Under Chronically Homeless PSH for Near Elderly and Elderly Project-Based Site-Based Waiting List - The language should be “eligible applicants must have documentation of chronic homelessness from the Administrator of Coordinated Assessment and Intake for the Homeless System (and not FrontLine Service) to receive 15 preference points on the Chronically Homeless Permanent Supportive Housing for near elderly and elderly project based waiting list.” [EDEN]

Response: CMHA has deleted reference to “Frontline Service” and will make the following change: *“Eligible applicants will be assigned 15 preference points on the Chronically Homeless Permanent Supportive Housing for Near Elderly and Elderly Project-Based Site-Based Waiting List. Eligible applicants must have documentation of chronic homelessness from Cuyahoga County Central Intake or its designated vendor to receive 15 preference points on the Chronically Homeless Permanent Supportive Housing for Near Elderly and Elderly Project-Based Site-Based Waiting List.”*

6. Chapter 4, Page 44 – Other Admissions

Comment: regarding the language of near-elderly/elderly being used for the PB Chronically Homeless PSH list, Northridge Commons is the one building that has a near elderly/elderly requirement but Greenbridge, Buckeye and South Pointe do not. Should we have the language of elderly/near elderly to describe the list if it is only for one project which is 5 units for PBVs or is this item in the chart only for Northridge and the other 3 bldgs are separate? [EDEN]

Response: Yes, it only applies to Northridge.

7. Chapter 4, Page 44 – Other Admissions

Comment: Under Homeless PSH Project-Based Site-Based Waiting List - Language should be “This preference applies to homeless applicants who are to reside in a property designated to serve homeless households in need of supportive services. Eligible applicants must have documentation of homelessness from the Administrator of Coordinated Assessment and Intake for the Homeless System (and not from a shelter) to receive 10 preference points on the Homeless Permanent Supportive Housing Project-Based Site-Based Waiting List.” [EDEN]

Response: Agreed, CMHA will change this section as follows: “*This preference applies to homeless applicants who are applying to reside in a property designated to serve homeless households in need of supportive services. Eligible applicants must have documentation of homelessness from Cuyahoga County Central Intake, its designated vendor, or a recognized homeless provider to receive 10 preference points on the Homeless Permanent Supportive Housing Project-Based Site-Based Waiting List.*”

8. Chapter 5, Page 52 – Changes in Family Composition

Comment: Changes in Family Composition - CMHA proposes to adopt HUD's final rule, "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity," Federal Register Vol. 77, No. 23, February 3, 2012 and allow another adult to be added to the family composition upon request of the Head-of-Household, regardless of actual or perceived sexual orientation, gender identity, or marital status. This proposed change is highly commendable and should be adopted. [Legal Aid Society]

Response: Agree.

9. Chapter 7, Page 85 – Verification of Social Security Numbers

Comment: Verification of Social Security Numbers - CMHA proposes to accept alternative forms of identification to verify social security numbers and proof-of-birth verification for homeless veterans. This proposed change is commendable and should be adopted. [Legal Aid Society]

Response: Agree.

10. Chapter 8, Page 88 – Briefing Packet

Comment: Lettered items - CMHA proposes to add a lettered item to the current list. The current plan states, in the sentence leading into the lettered items, "In addition, in conducting the criminal background check, the PHA will not consider a time period in excess of three years for:" Two modifications of this proposed change are suggested. First, letter "d)" would read more clearly if it did not repeat, "d) For three years for violent criminal activity." A possible change could simply be, "d) Violent criminal activity. The PHA only considers felony level criminal activity unless otherwise required by the CFR." Second, CMHA proposes to add a letter "e)" that states, "The time begins three years after incarceration or any court ordered supervision. Court ordered supervision means probation or any other court ordered requirements." This sentence would be better standing alone (not in the list of activities that are examined in the criminal background check), and clarifying its intended meaning. "The three year period considered by the PHA begins at the termination of incarceration or any court ordered supervision, including probation or any other court ordered requirements." [Legal Aid Society]

Response: This change may be considered in future revisions of the Administrative Plan.

11. Chapter 8, Page 88 – Briefing Packet

Comment: The Briefing Packet section on pages 88-89 of the Admin Plan should be amended to include notification to participants that additional housing search assistance is available (beyond providing the list of accessible units known to CMHA which may be available) in accordance with 24 C.F.R. §8.28(a)(3). [HRAC]

Response: CMHA conducts an oral briefing with new voucher holders. At the briefing, new voucher holders are also provided with a packet of written materials which are reviewed with them and a question and answer period is included for further discussion. Applicants and participants may also contact CMHA's ADA/504 Coordinator for assistance and may request a reasonable accommodation. CMHA takes many actions to assist the disabled, but every circumstance and need cannot be foreseen or addressed in the briefing packet or the Administrative Plan.

12. Chapter 9, Page 96 – Separate Agreements

Comment: Two changes are being proposed to ensure compliance with a recent court decision. These changes specify that fees for utilities or short term lease or month-to-month fees are rent and may not be included in a separate agreement. The revised language for chapter 9: [CMHA Staff]

Families and owners will be advised of the prohibition of side payments for additional rent, or for items normally included in the rent of unassisted families, or for items normally included in the rent of unassisted families, or for items now shown on the approved lease. Fees for utilities or short term lease or month-to-month fees are rent and may not be included in a separate agreement. Such fees must be fully disclosed in the lease or a subsequent Rent Increase Request. Any attempt to recover side payments for additional rent is illegal and unenforceable.

The family is not liable under the lease for unpaid charges for items covered by separate agreements and nonpayment of these separate agreements cannot be cause for eviction.

Owners and families may execute separate agreements for services, appliances (other than range and refrigerator) and other items that are not included in the lease if the agreement is in writing and approved by the CMHA.

Any appliances, services or other items which are routinely provided to unassisted families as part of the lease (such as air conditioning, dishwasher or garage) or are permanently installed in the unit, cannot be put under separate agreement and must be included in the lease. For there to be a separate agreement, the family must have the option of not utilizing the service, appliance or other item.

If the family and owner have come to a written agreement on the amount of allowable charges for a specific item, they will be allowed (e.g. furnishings) as long as those charges are reasonable and not a substitute for higher rent.

All agreements for special items or services must be attached to the lease approved by the PHA. If agreements are entered into at a later date, they must be approved by the PHA and attached to the lease.

The PHA will not approve separate agreements for modifications to the unit for persons with disabilities. The modifications are usually within the dwelling unit and are critical to the use of the dwelling.

Response: These changes will be made.

13. Chapter 11 Page 112 – Annual Adjustment of rent to Owner

Comment: Two changes are being proposed to ensure compliance with a recent court decision. These changes specify that fees for utilities or short term lease or month-to-month fees are rent and may not be included in a separate agreement. The revised language for chapter 11: [CMHA Staff]

Annual Adjustment of Rent to Owner (24 CFR 982.519)

Contract Rent for the first year remains unchanged. A request for an adjustment in Contract Rent can be made after the first anniversary date if:

- a) The owner requests the increase by giving notice to the PHA and
- b) The owner has complied with all requirements of the HAP contract, including compliance with HQS.

Rent to owner will only be increased for Housing Assistance Payments covering months commencing the later of:

- a) The first day of the first month commencing on or after the contract anniversary date or
- b) At least sixty days after the PHA receives the owner's request.

Rent to owner may be adjusted up or down. Any increase in owner rent will be the lesser of the amount of the increase requested by the owner, or an amount that does not exceed reasonable rent (as most recently determined or redetermined by the PHA in accordance with 24 CFR 982.503.)

Response: These changes will be made.

14. General

Comment: Throughout the Admin Plan: Proposed requirement that applicants and participants submit communication in writing - CMHA has proposed to add a requirement that applicants and participants submit correspondence to CMHA in writing. This requirement has been added to change in household composition, change in income, change in live-in aide residence, address changes for applicants, and many other policy areas.

These proposed additional requirements on applicants and participants should have a companion policy in which CMHA is required to provide to the applicant/participant a time-stamped copy of the correspondence for the applicant/participant's records. Alternatively or additionally, CMHA's policy should require that received correspondence should be documented in the applicant/participant's portal page that the correspondence has been received. This documentation will ensure that the applicant/participant has a reasonable way to verify that their correspondence has been received. Finally, CMHA should clarify that the correspondence may be delivered to CMHA by: mail, fax, email, hand-delivery, or through the applicant/participant's portal. [Legal Aid Society]

Response: It is CMHA's process to scan correspondence into clients' electronic files. In addition, CMHA accepts delivery of communications by a number of means. However, CMHA finds that documentation of this process would be more appropriately included in its procedures rather than its Administrative Plan.

11.0 (h). Capital Fund Program Annual Statement/Performance and Evaluation Report (HUD-50075.1)

11.0 (i). Capital Fund Program Five-Year Action Plan (HUD-50075.2)

In the Final Rule for the Public Housing Capital Fund Program, issued October 24, 2013, HUD decoupled the review and submission of Capital Fund documents from the PHA Plan. Although the 2016 Capital Fund Annual Statement and Five-Year Plan will be submitted separately during 2016, CMHA developed the following documents for review and comment during the 2016 PHA Plan process.

- FY2016 CFP
- FY2016 RHF (first increment)
- FY2016 RHF (second increment)
- FY2016 Capital Fund Program Five-Year Action Plan

Annual P&E Reports for open CFP, RHF, and CFFP are no longer required by HUD.