Annual PHA Plan
(Standard PHAs and
Troubled PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

B.	Annual Plan Elements						
<b>B.1</b>	Revision of PHA Plan Elements.						
	(a) Have the following PHA Plan elements been revised by the PHA?						
	Y       N         □       Statement of Housing Needs and Strategy for Addressing Housing Needs         □       Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.         □       Financial Resources.         □       Rent Determination.         □       Operation and Management.         □       Grievance Procedures.         □       Homeownership Programs.         □       Community Service and Self-Sufficiency Programs.         □       Safety and Crime Prevention.         □       Pet Policy.         □       Asset Management.         □       Substantial Deviation.         □       Significant Amendment/Modification						
	(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):						
	(c) The PHA must submit its Deconcentration Policy for Field Office review.						

B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N
	project based units and general locations, and describe how project basing would be consistent with the PHA Plan.
В.3	Civil Rights Certification.
	Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
B.4	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N □ ⊠
	(b) If yes, please describe:
B.5	Progress Report.
	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

<b>B.6</b>	Resident Advisory Board (RAB) Comments.				
	(a) Did the RAB(s) provide comments to the PHA Plan?				
	Y N □ ⊠  (c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.				
В.7	Certification by State or Local Officials.  Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.				
B.8	Troubled PHA.  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  □ ⊠ □  (b) If yes, please describe:				
C.	<b>Statement of Capital Improvements</b> . Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).				
C.1	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.				

Annual PHA Plan
(Standard PHAs and
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U.S.	Department of	f Housing a	nd Urban	Development
Offic	ce of Public an	d Indian Ho	ousing	

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

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

#### Definitions.

- (1) High-Performer PHA A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information	
A.1 PHA Name:Cuyahoga Metropolitan Housing Authority	<b>PHA Code</b> : <u>OH003</u>
PHA Type: Standard PHA Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY):01/2018	_
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of	f FY beginning, above)
Number of Public Housing (PH) Units Number of Housing Choice	e Vouchers (HCVs)
Total Combined Units/Vouchers24,552	
<b>PHA Plan Submission Type:</b> ☐ Annual Submission ☐ Revised An	nual Submission

#### Availability of Information.

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 FY2018, 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 (2017) PHA Plan. In addition to the changes and updates from 2017, 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 2018 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. The notice for a Public Hearing was published on August 9, 2017, 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 25, 2017 to obtain comments. The CMHA Board of Commissioners passed resolution #75-17 authorizing and adopting the FY2018 PHA Plan at a Board Meeting held on the October 4, 2017.

#### **B.** Annual Plan Elements

#### **B.1 Revision of Plan Elements**

# Statement of Housing needs and Strategy for Addressing 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.

In the City of Cleveland there are 34,250 renter households earning less than or equal to 30% AMI. Of these households, 82% (28,175) 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.

Percentage of Renters Earning Less than or Equal to 30% AMI with a Cost Burden of >30%				
Low Income Renter Households	City of Cleveland	Cuyahoga Urban County		
Elderly	4,715	4,280		
Small Related	10,800	5,266		
Large Related	2,040	863		
All Other	10,620	6,778		
Total Renter Households with Cost	28,175	17,187		
Burden >30%				
Total Renter Households Earning <=	34,250	19,700		
30% AMI				
Low Income Renter Households with	82%	87%		
Cost Burden > 30%				

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

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

Housing Needs of Families on the Waiting List Analysis based on Wait List as of July 2017						
Section 8 tenant-based assistance (Housing Choice Voucher Program)						
# of families   % of total families   Annual Turnove						
Waiting list total	5,632		1,116			
Extremely low income <=30% AMI	5,562	98.8%				
Very low income	54	1.0%				
(>30% but <=50% AMI)						
Low income	6	0.1%				
(>50% but <80% AMI)						
Families with children	4,486	79.7%				
Elderly families	62	1.1%				
Families with Disabilities	112	2.0%				
Black	5,005	88.9%				
White	494	8.8%				
Other	133	2.4%				

Housing Needs of Families on the Waiting List Analysis based on July 2017 Waiting List				
	# of families	% of total families	Annual Turnover	
Waiting list total	20,226		1,035	
Extremely low income <=30% AMI	18,550	91.7%		
Very low income (>30% but <=50% AMI)	1,276	6.3%		
Low income (>50% but <80% AMI)	400	2%		

Housing Needs of Families on the Waiting List					
Analysis based on July 2017 Waiting List					
Families with children	5,902	29.2%			
Elderly families (62+)	109	0.5%			
Families with Disabilities	288	1.4%			
White	3,025	15.0%			
Black	16,405	81.1%			
Other	796	3.9%			
	•	<u>,                                      </u>			
Characteristics by Bedroom Size					
1BR	14,545	71.98%	581		
2 BR	4,524	22.4%	262		
3 BR	854	4.2%	159		
4 BR	271	1.3%	31		
5 BR	28	0.1%	1		
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					

## Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

CMHA plans on continuing to meet the QHWRA 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.

It is the intention of the CMHA to promote Deconcentration of Poverty and Fair Housing in Programs admissions in all public housing estates subject to Deconcentration and income-mixing requirements as published by HUD (24 CFR Part 903; rule to Deconcentration Poverty and Promote Integration in Public Housing: Final Rule, dated December 22, 2000).

Once it is determined that an estate is subject to the deconcentration of poverty and income mixing requirements, the CMHA will utilize any, all, or none of the following strategies to accomplish the identified goals for deconcentration and income mixing:

- 1. Provide estate specific rent incentives to attract higher income families to estates where the average income is below the established income range.
- 2. Establish a preference for admission of working families to estates where the average income is below the established income range.
- 3. Skip a family on the waiting list in order to reach another family in an effort to further the Authority goals of deconcentration and income mixing.
- 4. Work with community partners to provide training, employment and/or other economic opportunities to assist current residents and their family members in achieving economic self-sufficiency and increased incomes.

5. Target investment and capital improvements to estates where the average income is below the established Income Range in order to attract higher income families.

CMHA will review annually the estates subject to the deconcentration of poverty and income mixing requirements and publish the affected estates and proposed strategies in the Public Housing Agency Annual Plan, as required by HUD.

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.

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.

In 2018, Public Housing program preferences will consist of seven **high priority** 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 preferences for:

- h) homelessness,
- i) working families and those unable to work because of age (elderly) or disability (disabled), and
- i) Veterans and veterans' families.

CMHA will administer its Public Housing waiting list as required by 24 CFR Part 960. CMHA, may restrict application intake, suspend application intake, and close waiting lists in whole or in part. The decision to close the waiting list will be based on the number of applications available for a particular size and type of unit, the number of applicants who qualify for Preference(s), the Authority's requirement to ensure at least 40% annual admission of extremely low income families, and the ability of the CMHA to house an applicant in an appropriate unit within a reasonable period of time.

When the CMHA opens the waiting list, the CMHA will advertise through public notice in the local newspapers, minority publications and through local organizations serving the disabled and under-served ethnic groups as defined by HUD.

CMHA will establish a waiting list of "preliminarily eligible" families for its public housing program. The public housing waiting list is automated and subdivided by bedroom size, preference, and date and time of application.

To ensure an adequate pool of families who appear to be eligible for admission the CMHA will periodically undertake marketing activities. Special marketing efforts may be undertaken to attract:

- 1. Applicants necessary to achieve a broad social and economic mix throughout each estate.
- 2. Individuals with disabilities to occupy specially retrofitted units;

- 3. Elderly and/or single persons to occupy zero and one bedroom units.
- 4. Applicants on the waiting list may be skipped in order to further goals of de-concentration and income mixing.

To maintain a pool of interested and apparently eligible families on the waiting list the CMHA will notify applicants periodically of the need to update their application as a condition of remaining on the waiting list.

Applicants will be removed from the waiting list for the following reasons:

- 1. The applicant receives and accepts an offer of housing;
- 2. The applicant requests that their name be removed from the waiting list;
- 3. The applicant is rejected, either because he/she was ineligible for public housing at the time of certification, or because he/she fails to meet the applicant selection criteria; or
- 4. The application is withdrawn because CMHA was unable to contact the applicant to follow up on their application.

After qualifying for initial eligibility and admission public housing residents who experience an increase to their income that results in an annual household income exceeding the 80% low income level will remain eligible for continued occupancy.

CMHA will consider the adoption of site-based waiting lists at some or all public housing locations during 2018. 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); PBRA properties (Carver I; Cedar I; Cedar II; Heritage View IV; Bohn Tower) and the properties being converted to the Rental Assistance Demonstration (RAD) program. 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.

Each family determined to be eligible for placement on the waiting list will be assigned an appropriate bedroom size consistent with the individual family's household composition and the established occupancy standards of the Authority. All eligible applications will be maintained by bedroom size in order of preference, and date and time of application receipt.

Eligible families will be offered units based on availability. CMHA will maintain a record of units offered, including location, date, and circumstances of each offer, and each acceptance and refusal, including the reason for refusal.

For 2018, the Housing Choice Voucher (HCVP) program will utilize sixteen preference categories. 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;
- Relocating CMHA Public Housing residents displaced by domestic violence, dating violence, sexual assault or stalking- 40 points on the general Tenant-Based waiting list.
- Relocating CMHA Project-Based residents displaced by domestic violence, dating violence, sexual assault or stalking- 40 points on the general Tenant-Based waiting list.
- 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 and Project-Based Waiting Lists;
- Displaced Moderate Rehabilitation program 30 points on the general Tenant-Based Waiting List;
- Family Unification Program (FUP)- 15 points on the General Tenant-Based waiting list;
- Cuyahoga County residency 10 points on the general Tenant-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;
- 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;
- Homeless 10 points on the Homeless Permanent Supportive Housing Project-Based Site-Based Waiting List;
- Aging Out of Foster Care/Emancipated Youth Permanent Supportive Housing Project-Based Site-Based Waiting List Preference- 10 points on the On the Project-Based site-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 have to replenish the HCVP waiting list by opening it for a lottery in 2018.

In cases where the perpetrator is abuse is considered particularly dangerous and/or the victim has not identified any Public Housing estate where they feel safe, the Voucher Program will permit the family to apply to the general tenant based waiting list to move to another location which may be safer for the family, if there are vouchers available. These families will receive 40 preference points on the HCVP general tenant-based waiting list.

#### **Financial Resources**

Financial Resources of approximately \$207 million will be available to CMHA in FY2018 to operate and/or administer a variety of low-income housing programs. Based upon FY2017 funding levels, CMHA anticipates receiving funding or funding commitments of about \$178 million from HUD during FY2018. Of that amount, \$95 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 \$17 million is anticipated to be awarded for public housing capital improvements through the Capital Fund Program (CFP). Another \$11.4 million will be generated through HAP payments for the Section 8 New Construction and RAD programs, as well as \$1 million from the Jobs Plus program grant.

Financial Resources: Planned Sources and Uses (Estimated)				
Sources	Planned \$	Planned Uses		
1. Federal Grants (FY2017 grants)				
a) Public Housing Operating Fund	60,000,000			
b) Public Housing Capital Fund	17,200,000			
c) HOPE VI Revitalization	0			
d) HOPE VI Demolition	0			

	inancial Resources:	
	Sources and Uses (Es	,
Sources	Planned \$	Planned Uses
e) Annual Contributions for Section 8 Tenant- Based Assistance	94,900,000	
f) Public Housing Drug Elimination Program	0	
g) Resident Opportunity and Self-Sufficiency Grants	200,000	
h) Community Development Block Grant	0	
i) HOME	0	
Other Federal Grants (list below)		
Replacement Housing Fund	0	
Demolition & Disposition Transitional Fund	1,200,000	
Section 8 New Construction HAP	3,440,000	
Rental Assistance Demonstration (RAD)	0	
Jobs Plus	1,000,000	
COPS	180,000	
Juvenile Reentry Assistance Program	20,000	
Total 2017 Grants (estimated)	178,140,000	
2. Prior Year Federal Grants (unobligated	As of 6/30/17	
funds only)		
Public Housing Capital Fund (CFP)	0	Capital and Management Improvements
Replacement Housing Fund (RHF)	1,052,740	Replacement housing
ROSS Service Coordinators grants	0	Services for families
ROSS Neighborhood Networks grant	0	Supportive services
21 <sup>st</sup> Century grant	0	Education
Salvation Army/Y-Haven grants	0	Transitional housing
Other misc. grants	20,000	Supportive services
Total Unobligated prior-year grants	1,072,740	
3. Public Housing Dwelling Rental Income		
Public Housing Dwelling Income	14,400,000	Public Housing operations
4. Other in come (list heless)		
<b>4. Other income</b> (list below) Section 8 Administrative Fees	0.000.000	HCVD magazam administration
	9,000,000	HCVP program administration
Section 8 New Construction revenue	1,670,000	Housing operations
Rental Assistance Demonstration (RAD)	756,432	
5. Non-federal sources (list below)		
Interest	40,000	Housing operations
Miscellaneous	1,760,000	Housing operations
Woody Woods rents	170,000	Housing operations
Total Daggers	207 000 173	
Total Resources	207,009,172	

# Please Note:

- (1) All Federal Grants for FY2018 are estimated based upon FY2017 levels.
- (2) Grant amounts indicate unobligated balances and will not all be spent in FY2018 since HUD allows multi-year periods for obligation and expenditure.

Unobligated balances from prior year grants amount to \$1 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 2018. Another \$28 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 \$9 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 \$1.7 million and the property under the Rental Assistance Demonstration Program (RAD) will generate \$750,000 in revenues other than subsidy. CMHA also anticipates interest income of about \$40,000 in 2018.

#### **Rent Determination**

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 2018, 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 2018, 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. In 2016, CMHA changed the basis for determining flat rents to the applicable Small Area Fair Market Rent (SAFMR). Public Law 113-76, also required that the utility allowance for a Voucher Program rental be calculated so that the amount allowed for tenant-paid utilities shall not exceed the appropriate utility allowance for the family unit size as determined by the public housing agency regardless of the size of the dwelling unit leased by the family, whichever is lower.

The annual income of the family is used to determine income eligibility, income targeting, and rent. CMHA has implemented the mandatory requirements for determining annual and adjusted income of families who apply for or receive assistance in the housing choice voucher and public housing programs as described at 24 CFR §5.609 through 5.634, and 24 CFR §960, as periodically revised by HUD.

In 2016, Rent determination policies for Housing Choice Voucher Programs were revised to meet the changes to the definition of tuition found in the *Eligibility of Students for Assisted Housing Under Section 8 of the U.S. Housing Act of 1937; Supplementary Guidance*.

CMHA revised its rent determination policies for the HCV and LIPH in accordance with Streamlining Administrative Regulations for Public Housing, Housing Choice Voucher, Multifamily Housing, and Community Planning and Development Programs," also known as the "streamlining rule." Published on March 8, 2016, the rule contains 16 provisions. The new regulatory provisions limit to 24 straight months the time period during which a family member is eligible to receive the benefit of the earned income disregard (EID), which streamline the administration of the EID by eliminating the requirement for PHAs to track family member changes in employment over a 4-year period. There are no changes to EID eligibility criteria, the benefit amount of the EID, the single lifetime eligibility requirement, or the ability of the applicable family member to stop and restart employment during the eligibility period. The streamlining rule requires PHAs to use the established flat rent applicable to the unit to calculate rents for mixed families in Public Housing. The final rule also requires that a mixed family's payment be equivalent to their total tenant payment (TTP) when their TTP exceeds the flat rent.

#### **Operation and Management**

Policies for the Public Housing program, including the Admissions and Continued Occupancy Policy (ACOP); Tenant Accounts Receivable Procedure; Work Order Procedure; and Maintenance Policy are reviewed 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 9,000 families in the Public Housing program, about 15,000 families in the Housing Choice Voucher program, and another 1,000 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.

Operations and Management Table				
Program Name	Units or Families Served at Year Beginning	Expected		
		Turnover		
Public Housing	8,700 families	1,400		
Rental Assistance Demonstration (RAD)	1000 families	170		
Section 8 New Construction	570 units	90		
Section 8 Vouchers	15,269 baseline units	1500		
Section 8 Mod Rehab	122 units	25		
Special Purpose Section 8 Vouchers (list	145 – Mainstream (elderly & non-elderly disabled)	12		
individually)	566 – VASH	24		
	400 – Non-elderly Disabled	19		
	64 – Family Unification Program	5		
Other Federal Programs:				
Family Self Sufficiency	280 families	14		
ROSS Neighborhood Network	3000 contacts	N/A		
Continuum of Care Transitional Housing	130 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.

To maintain the pest-free conditions of properties owned and managed by CMHA, uniform standards for housekeeping were developed for all residents. Residents may be subject to monthly housekeeping inspections, but CMHA must inspect each unit at least annually to determine compliance with housekeeping standards. By inspecting units monthly and/or annually, housing management is taking the necessary preventative measures needed to ensure residents units are not attractive to pests. The Housing Authority complies with the Code of Federal Regulations for the following programs; 24 CFR 982.401 Housing Quality Standards for the Housing Choice Voucher Programs; and 24 CFR 5.703 Physical condition standards for Public Housing and the Section 8 New Construction Programs.

### **Grievance Procedures**

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. CMHA has implemented a grievance procedure that meet the regulatory requirements set forth in 24 CFR§ 966.40 and 24 CFR§ 966.52 through 966.57. Chapter 12 of the ACOP sets forth the requirements, standards, and criteria to assure that residents and applicants receive an opportunity for a

hearing or informal review as prescribed by HUD regulations. In 2016, CMHA updated the Public Housing Grievance Procedure as required in accordance with the Streamlining Rule.

The HCVP informal hearing and review procedure is part of its Administrative Plan. The informal review and hearing requirements for HCVP are defined in HUD regulations under 24 CFR 982.54(d)(12), 982.554, and 24 CFR 982.555(a-f), 982.54(d)(13) are applicable to participating families who disagree with an action, decision, or inaction of CMHA. Chapter 19 of the Administrative Plan describes the policies, procedures and standards to be used when families disagree with a CMHA decision. The procedures and requirements are explained for informal reviews and hearings. It is the policy of CMHA to ensure that all families have the benefit of all protections due to them under the law.

## **Homeownership Programs**

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 2017, 85 families have purchased homes through the HCVP program.

## **Community Service and Self-Sufficiency**

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 services 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. In 2014 CMHA, implemented a community service and self-sufficiency marketing campaign to raise awareness, and encourage compliance with the mandatory requirements.

Family Self-Sufficiency (FSS) is a U.S. Department of Housing and Urban Development (HUD) program established in 1990 to help HCVP residents to obtain employment that will lead to economic independence and self-sufficiency. HUD expanded the FSS program in 2012, extending the opportunity to LIPH residents.

The FSS program is available to all families receiving CMHA rental assistance. It is voluntary and designed to assist families in becoming self-sufficient so they will no longer need to rely on public assistance. Participants in the program

will be linked to supportive programs such as job training, educational opportunities, financial literacy, and English as a Second Language. As of July 2017, there are 280 current participants of the FSS Program.

#### **Safety and Crime Prevention**

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 state-certified police force. The CMHA Police Department (CMHAPD) was nationally accredited in March 1998 with re-accreditations in 2001, 2004, 2007, 2010, 2013 and 2016. Additionally, in 2016 the CMHAPD became accredited through the State of Ohio Collaborative for Law Enforcement Agencies. The CMHAPD engages in active law enforcement, crime prevention efforts, internal and external agency collaborations to protect CMHA residents, employees and property and to decrease the fear of crime.

The CMHAPD is organized into two (2) divisions: Field Operations and Administrative Operations. In addition to basic patrol services it operates a Crime Suppressions 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 CMHAPD is 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 /violence and their families. The CMHAPD is also active with various initiatives aimed at engaging youth to develop positive relationships as a means to prevent crime and disorder. The Police Department, in partnership with the CMHA Department of Resident Service; the Partnership for a Safer Cleveland; FrontLine Services Inc.; Children Who Witness Violence Program; Beech Brook Family Services; the Case Western Reserve University's (CWRU) Begun Center for Violence Prevention Research; and CWRU's Mandel School of Applied Social Science University have implemented a Police Assisted Referral (PAR) program. The PAR program provides for early identification and intervention of families and children who are exposed to violence. The Resident Services, the Police Department and partnering social service providers work collectively to assess the needs of individuals who are victimized by domestic violence, dating violence, and sexual assault or stalking. Residents are referred and connected to community agencies to assist with their needs. In addition to referrals the Resident Services Department offers Domestic Violence workshops and support groups for victims as well as case management services to victims and their family members.

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. In 2017, CMHA is developed a VAWA Policy and revised its Transfer Policies to ensure that victims claiming VAWA protections receive an expedited transfer. 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 or intentionally denied any person for housing due to being a victim of domestic violence.

CMHA has a Domestic Violence Liaison within the Resident Services Department. The liaison, in partnership with the CMHA Police Department, assists both Public Housing and Voucher participants in prevention, education and awareness of domestic violence. The goal for this liaison is to provide services to as many residents/participants as possible and to reduce the number of domestic violence incidents for CMHA residents/participants. This liaison ensures the accessibility

of services, resources and support to our participants/residents through the following programs and activities: Monthly support groups and one on one sessions with current and past domestic violence victims; Quarterly domestic violence awareness and prevention workshops at rotating public housing family properties; A designated case manager assigned to assist with providing resources for counseling, furniture, food, clothing etc.; education and outreach utilizing partnerships with community organizations such as the Domestic Violence Child Advocacy Center, Rape Crisis Center and Frontline Services (Children who witness violence program); and an Annual Sister Share Event for Domestic Violence month where residents/participants from all over come to receive information and resources, attend educational breakout sessions and hear a key-note motivational speaker.

The CMHA Police Department maintains a 24/7 Radio Communications Center (RCC) to answer emergency calls for service from residents and stakeholders. RCC accepts maintenance related calls and routes it to the appropriate property manager for resolution. Additionally, RCC monitors fire alarms and medical alerts from a CMHA owned and controlled property. It also operates an Internal Affairs Unit to investigate integrity concerns and collaborates regularly with the CMHA Department of Risk and Safety Management to conduct 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 and monitoring of security cameras, which are becoming an important tool for investigating drug-related crime that may occurs at the family estates and high rises. 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 Police Department 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 and are helpful for successful investigations and prosecution. The CMHA RCC is a modern, state-of-the-art dispatch center that also serves as the "hub" for monitoring the cameras. CMHA has installed security camera systems at several of the larger family estates, and has been awarded emergency funding from HUD to install advanced security camera systems at the following family estates: Lakeview Terrace, King Kennedy, Outhwaite, Woodhill and Bellaire Gardens.

It should be noted that 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.

#### **Pet Policy**

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.

#### **Asset Management**

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.

As a part of CMHA's ongoing efforts to actively serve our Residents and Applicants, CMHA has undertaken both mixed and publicly financed development solutions to rehabilitate, renovate, construct and safeguard its housing assets. In 2017, CMHA undertook a deliberate examination of the current AMP grouping to ensure that the portfolio of assets is arranged in a manner that is fiscally prudent and transparent, facilitates future redevelopment, allows staff to capitalize on opportunities for efficiency, and maximizes delivery of management services without compromising the quality of our product. To this end CMHA submitted a proposed AMP regrouping request to HUD on June 30, 2017. The regrouping proposal included the following elements:

- The regrouping of Addison Townhomes into the Hough AMP;
- The regrouping of Laronde, Harvard Townhouses, 35 Scattered Rehab units, 10 NOAH East units, 10 Scattered Homes units, 26 Scattered Townhouse units, and 1 Scattered Turnkey unit into the Southeast AMP;
- The regrouping of Woodhill Shale, Woodhill Scattered, Woodland E. 115<sup>th</sup>, and Scattered Turnkey into the Eastside AMP;
- The regrouping of West Boulevard into the Downtown AMP;
- The regrouping of Jefferson-West 5<sup>th</sup>, Midwest Cluster, and Walton Place into the Near West AMP;
- The regrouping of several properties within the Small or Scattered AMP into the Far West AMP;
- The regrouping of Riverview Tower, Riverview Daycare, 35 Scattered Homes and the Scattered Rehab units into the Riverview Replacement Scattered AMP.

All of the proposed developments are located within proximity of other developments within the existing AMP CMHA proposed to regroup them into. This regrouping will allow CMHA to more effectively and efficiently manage the projects within the geographical area. CMHA's AMP regrouping request was approved by HUD on August 17, 2017. The revised AMP listing is included on the table below.

Asset Management Project (AMP) groupings for 2018:				
AMP	ESTATE NAME	OH #	ACC UNITS	
901	CEDAR EXTENSION HI-RISE	3011	156	
901	OLDE CEDAR	3014	312	
901	OLDE CEDAR MROP	3088	238	
901 Cedar Totals			706	
902	LEGACY PARK APTS.	3127	36	
902	OUTHWAITE (Ext.1)	3003	244	
902	OUTHWAITE (original)	3015	100	
902	OUTHWAITE (MROP)	3096	224	
902	OUTHWAITE (HOPE VI)	3108	111	
902 Outhwaite Totals			715	

903	CARVER PARK	3007	251
903	CARVER PARK (MROP)	3092	217
903 Carver Totals			468
904	KING KENNEDY NORTH	3026	186
904	KING KENNEDY SOUTH	3018	309
904	RENAISSANCE (KKS MROP)	3086	66
904	DELANEY (KKS HOPE VI)	3107	126
904	PHOENIX VILLAGE Ph. 1	3109	45
904	PHOENIX VILLAGE Ph. 2	3114	53
904 King Kennedy Totals			785
905	ADDISON SQUARE	3034	226
920	ADDISON TOWNHOUSES	3032	36
905	WILLSON APTS.	3024	276
905	SPRINGBROOK	3022	227
905	WADE APTS.	3021	230
905 Hough Totals			995
906	MILES-ELMARGE	3041	140
906	MT. AUBURN MANOR	3039	109
906	OAKWOOD GARDENS	3074	25
906	OAKWOOD VILLA	3054	92
907	LARONDE APTS.	3030	60
906	UNION SQUARE	3044	174
911	HARVARD TOWNHOUSES	3044	6
911	MILES SCATTERED	3041	1
911	NOAH EAST	3072	10
911	SCATTERED REHAB.	3073	35
911	SCATTERED TOWNHOUSES	3075	26
911	SCATTERED HOMES	3106	10
911	TURNKEY SCATTERED	3126	3
906 Southeast Totals			691
907	APTHORP TOWER	3037	167
907	BEACHCREST TOWER	3035	243
907	WOODHILL HOMES	3004	487
907	EUCLID BEACH GARDENS	3052	150
911	WOODHILL SHALE (Sunrise)	342A	14
911	WOODHILL SCATTERED	344A	17
911	TURNKEY SCATTERED	3126	17
911	WOODLAND-E115th	3128	6
907 Eastside Totals			1101
908	LAKEVIEW TERRACE	3016	506
908	LAKEVIEW TOWER	3031	213
909	WEST BOULEVARD	353B	120

908 Downtown Totals			839
909	RIVERVIEW FAMILY	3078	8
909	CRESTVIEW APTS.	3017	222
909	MANHATTAN TOWER	330B	29
909	PARK DENISON	330A	39
909	SCRANTON CASTLE	3036	63
909	SCRANTON EXTENSION	353A	102
911	JEFFERSON-WEST 5TH	3050	18
911	WALTON PLACE	3038	12
911	WALTON EXT	3129	3
909 Nearwest Totals			496
910	BELLAIRE GARDENS	3033	285
910	BELLAIRE TOWNHOUSES	3071	60
910	FAIRWAY MANOR	3077	55
910	LORAIN SQUARE	3040	111
910	RIVERSIDE PARK	3008	408
911	BELLAIRE RD APTS	3116	8
911	BELLAIRE RD APTS 2	3131	16
911	BELLAIRE RD APTS 3	3132	16
911	PURITAS GARDENS	3056	24
911	PURITAS GARDENS EXT.	3117	6
911	SCATTERED TOWNHOUSES	3075	10
911	TURNKEY SCATTERED	3126	7
910 Farwest Totals	·		1006
911	LANDON	3038	10
911	SCATTERED TOWNHOUSES	3075	18
911 Small Scattered Total			28
926	Riverview Replacement/Scattered	3118	55
926	Riverview Replacement/W.101st	3118	34
909	RIVERVIEW TOWER	3025	506
911	SCATTERED HOMES	3106	35
911	SCATTERED REHAB.	3073	118
926 RR Scattered Totals			748
924	RIVERSIDE PARK HOMES	3120	90
924 RPKH AMP Totals		•	90
928	HERITAGE VIEW I	3123	81
928 HVI AMP Totals		, , , , , , , , , , , , , , , , , , ,	81
929	HERITAGE VIEW II	3124	57
929 HVII AMP Totals			57
930	HERITAGE VIEW III	3125	69
930 HVIII AMP Totals			69
931	BELMORE EUCLID	3133	39

931	LEE ROAD		40	
931 Euclid Lee AMP Totals			79	
932	MILES POINTE	3135	43	
932 Miles AMP Totals			43	
921	EASTSIDE HOMES	3112	48	
921	UNION COURT	3119	48	
921 Eastside Homes Totals			96	
922	WESTSIDE HOMES	3111	38	
922 WSH Totals			38	
923	GORDON SQUARE	3113	58	
923 GSH Totals			58	
925	TREMONT POINTE I	3121	51	
925 TRP I Totals		51		
927	TREMONT POINTE II	3122	44	
927 TRP II TOTALS				
PUBLIC HOUSING TOTAL				
PROJECT-BASED RENTAL	ASSISTANCE			
RAD	BOHN TOWER	RD00001	267	
RAD	CARVER PHASE I	RD00006	279	
RAD	HERITAGE VIEW IV	RD00004	60	
RAD	CEDAR REDEVELOPMENT I	901B	49	
	(CANKOEA)			
RAD	(SANKOFA)  CEDAR REDEVELOPMENT II (SANKOFA)	901A	30	
RAD S8NC	CEDAR REDEVELOPMENT II	901A #380	30 202	
	CEDAR REDEVELOPMENT II (SANKOFA)			
S8NC	CEDAR REDEVELOPMENT II (SANKOFA) AMBLESIDE TOWER	#380	202	
S8NC S8NC	CEDAR REDEVELOPMENT II (SANKOFA) AMBLESIDE TOWER QUARRYTOWN	#380 #382	202 181	

The anticipated 2018 ACC unit count of 9,284 units for the Public Housing program in this table reflects the unit inventory as of June 30, 2017, and includes 253 ACC units that have been demolished at Cedar Extension family. Bohn Tower (from the Downtown AMP) and Carver Park HOPE VI - I has been converted to the Rental Assistance Demonstration (RAD) program as well as 139 new units at three additional RAD projects - Heritage View Phase IV (60 units), Cedar Extension Phase I (49 units), and Cedar Extension Phase II (30 units). During 2018, Carver Park, Riverside Park Homes, 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.

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 2017.

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 2018 Capital Fund Annual Statement and Five-Year Plan will be submitted separately during 2018, CMHA has developed a draft 2018 CFP Annual Plan and a CFP Five-Year Plan through 2022 for review and comment during the 2018 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 2018 with FY2017 and prior year CFP funds. CMHA has based the CFP annual and five-year plans for FY2018 on the FY2017 funding amount of \$18.4 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)

- o OH003-018 & OH003-003/015
- o Summary:
  - Conversion of King Kennedy South high-rise into the Carl B. Stokes Social Services Mall {1996} that
    houses social service programs (originally 20 partners) and transitional housing programs (currently YHaven 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)

- o 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)

- o 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. Vallevview /Tremont Pointe (2003)

o OH003-001 (OH003-121 & OH003-122)

#### o 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}

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 115<sup>th</sup> St. (including 2 UFAS). CMHA will also use RHF funds to assist with construction of the new RAD projects at Cedar Extension, Heritage View, Bohn Tower and Carver Park. Other potential plans utilizing RHF funds include the RAD conversions at Carver Park, Riverside Park and Hough, 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 affordable 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 Elmarge for parking, the property located at 1408 East 89<sup>th</sup> 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.

### Substantial Deviation and Significant Amendment / 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.

## **B.2 New Activities**

### **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 22<sup>nd</sup> and East 55<sup>th</sup> Streets on the west and east.

In 2012, CMHA was awarded a CNI Planning grant for \$300,000 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 of the Transformation Plan is will be on the redevelopment of the Cedar Extension family and Olde Cedar properties as the target housing project. The Plan provided the basis for CNI Implementation grant applications in 2013 (not funded) and 2015 (not funded).

In June 2016, CMHA submitted an additional grant application for Cleveland's Central Neighborhood. This area is adjacent to two the downtown employment center and the Midtown Business District. Authentic resident engagement resulted from the twenty-six resident/community meetings held during the planning process. Residents worked with a diverse team of civic leaders, consultants, organizations, anchor institutions, and businesses to guide objectives and strategies. A critical outcome from this work was wealth building through a multi-generational approach. The Housing, People, and Neighborhood strategies outlined in the Transformation Plan were derived from a two-year planning process. The planning process findings and recommendations shape nine inter-related Transformation Directives that drive Housing, People, and Neighborhood strategies to shape and ultimately, implement Central's Transformation. Each of the Transformation Directives addresses a different characteristic of the neighborhood that has been demonstrated and identified as an area of importance for residents and stakeholders. Each relates to the components of Neighborhood, Housing, and People as the guiding forces behind the Transformation.

The Transformation Directives are used as a basis for assessing and activating the proposed initiatives that include the redevelopment of the dilapidated Cedars housing estates into a vibrant, mixed income community, a coordinated effort of community partners to provide supportive services to residents, and neighborhood strategies designed to unite the community, prepare residents for work, and establish a neighborhood identity. The Housing Plan will result in an additional 170 new units consisting of a 60 unit senior building and 110 townhouse units to complement the first two phases.

The Neighborhood Plan consists of a number of projects have been identified that will be led by the Neighborhood Implementation Entity, the City of Cleveland, with assistance from two community development organizations working in the Central community today. Key initiatives of the People Plan include providing free internet access for all Cedar residents through Connect Home, and a Jobs Plus program that would mirror the program already implemented at a nearby site. The Principal Education Partner, Sisters of Charity Foundation (SOCF) has partnered with the Cleveland Metropolitan School District (CMSD) to provide student education grants to improve school performance. 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 allowed 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 completed 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 are mixed income with the subsidized units being part of the RAD program. CMHA plans to apply for the next round of the Choice Implementation funding to complete the additional phases of this project. With or without the Implementation grant, CMHA will proceed with implementing as many aspects of the People and Neighborhood components as possible.

Woodhill Homes is a family property owned and managed by CMHA located on a large wooded site (25 acres) in the Buckeye-Woodland neighborhood of Cleveland, Ohio. Woodhill Homes is comprised of over 60 buildings with 478 units available for housing (2-story row houses and 3-story walkups) that were built in 1939. Woodhill Homes was found eligible for inclusion in the National Register of Historic Places in 1990, and is a unique and extraordinary site for housing, as it is located on a hillside slope rising about 50 feet up to the east, with steep terrain and heavy vegetation. The site is bounded by Woodland Road to the south, Woodhill Road to the west, Mount Carmel road to the north and East 100th Street to the east. In 2011, the Woodhill Community Center underwent an extensive renovation totaling \$6 million, with another \$4.7 million dollars spent in energy efficiency upgrades. While some of the residential units at the site have undergone some renovations, much of it remains original to the 1939 construction.

Alongside its partners, CMHA applied for Choice Neighborhoods Planning Grant that will seek to create a strategic vision for the revitalization of this historic public housing site and the surrounding community. The neighborhood where Woodhill resides has experienced both challenges and successes, and Woodhill will be key element in shaping the positive future of this community.

#### **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) was financed with 4% LIHTC, a FHA Loan, and RHF funds and closed in February 2015 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 2018 will be funded from a FHA loan

CMHA will consider other mixed-finance projects in 2017, including Choice Neighborhoods (additional phases at Cedar Extension and Olde Cedar), Heritage View (Garden Valley) Phase V, Woodhill, and additional RAD projects at Springbrook/Wade and Scattered site properties at several locations, Cedar Extension Hi-Rise and/or other potential projects in the Downtown, Central, Glenville, Hough, Mt. Pleasant, Ohio City and/ or other neighborhoods of Cleveland where there is an opportunity to do so.

### **Demolition and/or Disposition**

During 2017, CMHA will consider developing demolition plans for its scattered site houses, 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 25<sup>th</sup> Street, and at Woodhill Homes for up to 13 buildings (94 units) identified as Village D in the Master Plan and 8 units on West 25<sup>th</sup> street.

CMHA has approved disposition plans for the CMHA Headquarters building and vacant land on West 25<sup>th</sup> Street, and is in the process of transferring the remaining vacant land at Valleyview to the Westcreek Conservancy and/or its affiliated entities 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, single family homes within the Scattered Sites AMP, and other parcels of vacant land along Superior Avenue.

Demol	ition/Disposition Act	ivity Description tal	ble					
	1a.	1b.	2.	3.	4.	5.	6.	7.
AMP	Development	Dev#	Type	Status	Date	Effected Are	a	Timeline
901	Cedar Extension (Family)	OH003-011/023	Dispo	Planned	1/13	Vacant land	Part	1-12/18
901	Olde Cedar	OH003-014/088	Demo	Planned	1/15	105 units 5 bldgs	Part	1-12/18
902	Outhwaite	OH003-003	Demo	Planned	1/15	Maint. Bldg.	Part	1-12/18
902	Outhwaite	OH003-003	Dispo	Planned	1/15	Vacant land	Part	1-12/18
903	Carver Park	ОН003-007	Dispo	Planned	1/15	Vacant land	Part	1-12/18
903	Carver Park (A&B)	ОН003-007	Demo	Planned	1/14	251 units 16 bldg	Part	1-12/18
905	Superior Terrace	ОН003-076	Dispo	Planned	1/15	Vacant land	Part	1-12/18
906	Garden Valley (Heritage View)	OH003-13/19/27	Dispo	Planned	8/14	Vacant land	Part	1-12/18
907	Woodhill Homes	ОН003-004	Demo/ Dispo	Planned	1/15	94 units 13 bldgs.	Part	1-12/18
907	Woodhill Homes	OH003-004	Demo	Planned	1/15	Maint. Bldg.	Part	1-12/18
908	Lakeview Terrace	ОН003-016	Demo/ Dispo	Planned	1/15	116 units 7 bldgs.	Part	1-12/18
908	Lakeview Terrace	ОН003-016	Demo/ Dispo	Planned	1/15	Boiler Plant	Part	1-12/18
908	Administrative Headquarters	ОН003-031	Dispo	Approved	6/12	1 Bldg & land	Part	8/13-12/18
909	Riverview	ОН003-025	Demo/ Dispo	Planned	1/14	8 units 1 bldg.	Part	1/14-12/18
909	Riverview	ОН003-025	Dispo	Planned	1/15	Vacant land	Part	1-12/18
911	Scat. T'houses – Broadway/Worley	ОН003-075	Dispo	Planned	1/15	Vacant land	Part	1-12/18
911	Scat. T'houses – West 58th	ОН003-075	Demo	Planned	1/14	12 units 6 bldgs.	Part	1/14-12/18
911	Scattered Sites	OH003-073,106, 126,	Demo	Planned deminimus	9/14	6 units	Part	9/14-12/18
911	Scattered Sites	OH003-073,106	Dispo	Planned	1/15	5 vacant parcels	Part	1-12/18
911	Scattered Turnkey	ОН003-126	Demo/ Dispo	Planned	11/13	1 unit	Part	11/13-6/18
941	Valleyview	OH003-001	Dispo	Approved	9/11	Vacant land	Part	9/11-3/18

911	Scattered Sites	OH003-044,050,	Demo/	Planned	1/18	421 units	Part	1-12/18
		038,129,041,44A	Dispo					
		072,056,117,42A	-					
		106,073,075,126,						
		132,116,131						

### **Designated Housing for Elderly and Disabled Families**

CMHA has 2,336 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 2017. CMHA has requested and received two-year extensions of the designated housing plan in 2008, 2010, 2012 and 2014, 2016, and will request another extension in December 2017 for 2018-2020. Through this designation, new admissions or transfers to these estates have been prioritized for the Elderly (age 62+) and Near-Elderly (age 50-61).

	Development name	AMP	Development #	0-BR	1-BR	2-BR	Total	Desig.%
1	Addison Square	905	OH12P003034		220		220	100%
2	Apthorp Tower	907	OH12P003037		162		162	100%
3	Beachcrest Apts.	907	OH12P003035	18	178	39	235	100%
4	Cedar Apartments Ext.	901	OH12P003011		103	52	155	40%
5	Euclid Beach Gardens	907	OH12P003052		149		149	100%
6	Fairway Manor	910	OH12P003077		54		54	100%
7	King Kennedy North	904	OH12P003026		177	2	179	100%
8	LaRonde	907	OH12P003030	9	48		57	100%
9	Lorain Square	910	OH12P003040		110		110	100%
10	Mt. Auburn Manor	906	OH12P003039		106		106	100%
11	Oakwood Villas	906	OH12P003054		91		91	100%
12	Riverside Park Senior Bldg. *	924	OH12P003120		24	4	28	31%
13	Riverview Towers	909	OH12P003025		498		498	100%
14	Scranton Castle & Extension	909	OH12P003036		161		161	100%
15	Union Court (Eastside)	921	OH12P003112		48		48	50%
16	Lee Road	931	OH12P003134		30	10	40	100%
17	Miles Pointe	933	OH12P003135		33	10	43	100%
	Total		_	27	2,192	117	2,336	

<sup>\*</sup> Property being converted to RAD

## **Conversion of Public Housing**

The requirement for mandatory conversions 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 **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 according to the original Commitment to enter into a Housing Assistance Payment (CHAP) and any subsequent amendments, 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 a CHAP for the following;

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

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

• Cedar Extension Phase I – a new apartment building consisting of 60 (49 RAD) one bedroom units will replace seven row house buildings

Name of PH Project:	PIC Development#:	Conversion Type:	Transfer of Assistance:
Cedar Ext. Phase I	OH003000901	PBRA	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:
49	Family (Rowhouse)	Family (Mid-rise)	\$91,700
Bedroom Type:	<u>Pre-Conversion Units:</u>	Post-Conversion Units:	Change - Bedroom Type:
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	None		
assistance:			

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

Name of PH Project:	PIC Development#:	Conversion Type:	Transfer of Assistance:
Cedar Ext. Phase II	OH003000901	PBRA	No
<u>Total Units:</u>	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:
30	Family (Rowhouse)	Family (Townhouse)	\$56,142
Bedroom Type:	Pre-Conversion Units:	Post-Conversion Units:	Change - Bedroom Type:
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

Name of PH Project:	PIC Development#:	Conversion Type:	Transfer of Assistance:	
Heritage View Phase IV	ОН003000906	PBRA	No	
<u>Total Units:</u>	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:	
60	Family (Walkup/Row)	Family (Mid-rise)	\$112,283	
Bedroom Type:	<u>Pre-Conversion Units:</u>	Post-Conversion Units:	Change - Bedroom Type:	
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	None			
assistance:				

• 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

Name of PH Project:	Name of PH Project: PIC Development#:		Transfer of Assistance:	
Riverside Park Phase I	OH003000924	PBRA	No	
<u>Total Units:</u>	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:	
90	Elderly (Mid-rise) and	Elderly (Mid-rise) and	\$168,425	
	Family (Townhouses)	Family (Townhouses)		
Bedroom Type:	Pre-Conversion Units:	Post-Conversion Units:	Change - Bedroom Type:	
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	None
assistance:	

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

Name of PH Project:	PIC Development#:	Conversion Type:	Transfer of Assistance:	
Riverside Park Phase II	OH003000910	PBRA	No	
<u>Total Units:</u>	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:	
407	Family (Townhouses)	Family (Townhouses)	\$761,655	
Bedroom Type:	<u>Pre-Conversion Units:</u>	Post-Conversion Units:	Change - Bedroom Type:	
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	None			
assistance:				

Midwest Cluster – includes three properties from the Scattered or Small AMP consisting of 12 units on West 58<sup>th</sup> that will be demolished and replaced, 6 units on West 57<sup>th</sup> and 10 units on Landon that will be rehabilitated, 34 units on West 101<sup>st</sup> 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

Name of PH Project: PIC Development#:		Conversion Type:	Transfer of Assistance:
Midwest Cluster	OH003000909 (8 units)	PBRA	No
	OH003000911 (28 units)		
	OH003000926 (34 units)		
<u>Total Units:</u>	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:
70	Family (Townhouses and	Family (Townhouses and	\$130,997
	Mid-rise)	Mid-rise)	
Bedroom Type:	Bedroom Type: Pre-Conversion Units:		Change - Bedroom Type:
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	None		
assistance:			

• 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

Name of PH Project:	PIC Development#:	Conversion Type:	Transfer of Assistance:
Carver Park Phase I	ОН003000903	PBRA	No
<u>Total Units:</u>	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:
496	Family (Townhouses)	Family (Townhouses)	\$928,210
Bedroom Type:	Pre-Conversion Units:	Post-Conversion Units:	Change - Bedroom Type:

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	None		
assistance:			

• 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.

Name of PH Project:	PIC Development#:	Conversion Type:	Transfer of Assistance:				
Carver Park Phase II	ОН003000903	PBRA	No				
<u>Total Units:</u>	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:				
251	Family (Walkup/Row)	Family (Townhouse)	\$469,720				
Bedroom Type:	<u>Pre-Conversion Units:</u>	Post-Conversion Units:	Change - Bedroom Type:				
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	A plan will be developed for units subject to transfer of assistance that would include any						
assistance:	policy changes for eligibility,	policy changes for eligibility, admission, selection, and occupancy.					

• Springbrook and Wade Apartments, which are part of the Hough AMP, are two 16-story high-rise 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.

Name of PH Project:	PIC Development#:	Conversion Type:	<u>Transfer of Assistance:</u>
Springbrook Wade	OH003000905	PBRA	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation:
442	Family (High-rise)	Family (High-rise)	\$827,154
Bedroom Type:	<u>Pre-Conversion Units:</u>	<u>Post-Conversion Units:</u>	Change -Bedroom Type:
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	None		
assistance:			

### **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 several AMP's as part of the structure for the new 2018 AMP grouping, 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.
- Oakwood, which is a part of the Southeast AMP. Oakwood is a southeastern suburb of Cleveland where CMHA owns and would renovate an elderly designated development (Villas) of 10 row house 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 row house 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 high-rise 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 either Project Based Rental Assistance (PBRA) or Project Based Voucher (PBV) 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

#### **Occupancy by Police Officers**

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

#### **Non-Smoking Policies**

CMHA is developing a smoke-free policy for its housing units and common areas which will be the implemented effective as of July 2018.

### **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 September 2017, a total of eleven projects, representing 374 units, were under PBV contracts.

The HCVP maintains a Project-Based Voucher waiting list from which potential tenants of PBV units at CNC II, Educator Apartments, Church Square 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 Northridge & South Point Commons, 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.

#### **Units with Approved Vacancies for Modernization**

As of July 20, 2017, CMHA has 37 units approved for vacancy that are undergoing modernization in accordance with 24 CFR §990.145(a) (1) as detailed in the chart below;

AMP	Development Name	PIC Unit Number	Address	Date Unit is being taken off- line for Mod Work	Approved Expected Date of Mod Work Completion	Requested Date of Mod Work Completion	HA Request Date	HUD Approval Date
902	Outhwaite (Legacy Park)	127205	2452 E 43rd #205	02/28/17	7/25/17 & 7/1/2017	7/25/17 & 7/1/2017	7/5/17 5/23/2017	07/17/2017 5/30/2017

902	Outhwaite	31392	4740	04/26/17	10/30/17	10/30/17	5/23/2017	5/30/2017
	Homes		Scovill #1392					
902	Outhwaite	030227	2565-A E	06/29/16	12/30/2016	7/31/17	7/29/2016	8/19/2016 &
	Homes		43rd St		&	&7/5/17 &	&04/04/2017	5/2/2017
903	Carver Park	72043	2406 E.	11/12/2015	07/05/2016 11/11/17 &	12/30/2016	&7/21/17 4/4/17,	3/25/2016 &
903	Carver Park	12043	2406 E. 55th	11/12/2013	1/7/2017	11/11/17 & 1/7/2017	3/22/2016 &	5/02/2016 &
			3301		1///2017	1///2017	7/22/16	3/02/2017
903	Carver Park	72042	2404 East	3/11/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			55		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72045	2410 East	2/29/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			55th		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72036	2424 East	3/21/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			55th		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72037	2426 East	3/30/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			55th		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72088	2417	2/12/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			Unwin		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72096	2433	2/22/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			Unwin		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72091	2423	3/9/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			Unwin		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72090	2421	3/17/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016
			Unwin		1/7/2017	1/7/2017	7/29/2016	&05/02/2017
903	Carver Park	72094	2429	3/31/2016	11/11/17 &	11/11/17 &	4/4/17 &	8/19/2016 &
			Unwin		1/7/2017	1/7/2017	7/29/2016	05/02/2017
903	Carver Park	72059	5304	3/21/2016	9/20/2016	11/11/17 &	4/4/17 &	8/19/2016 &
			Quincy		&	12/15/2016	7/29/2016	05/02/2017
903	Carver Park	72029	2442 East	6/19/2016	11/11/2017	11/11/17 &	4/4/17 &	8/19/2016 &
903	Carver Park	12029	55th	0/19/2010	11/11/17 & 1/7/2017	1/7/2017	7/29/2016	05/02/2010 &
903	Comron Donle	72226	4700	7/14/2016	11/11/17 &	11/11/17 &	4/4/17 &	
903	Carver Park	72236	Quincy	7/14/2016	10/31/2016	10/31/2016	7/29/2016	8/19/2016 & 05/02/2017
			Ave		10/31/2010	10/31/2010	112312010	03/02/2017
903	Carver Park	72102	2445	9/14/2016	11/11/17 &	11/11/17 &	4/4/17 &	05/02/2017
			Unwin		2/1/2017	2/1/2017	3/3/2017	&
			#2102					3/16/2017
903	Carver Park	72207	4881	11/4/2016	11/11/17 &	11/11/17	4/4/17 &	05/02/2017
			Scovill #2207		5/15/2017	&5/15/2017	3/3/2017	& 3/16/2017
903	Carver Park	72149	5100	1/8/2017	11/11/17 &	11/11/17	4/4/17 &	05/02/2017
	Cui (Oi I ui K	, 2117	Quincy	1,0,2017	7/4/2017	&7/4/2017	3/3/2017	&
			#2149					3/16/2017
903	Carver Park	72077	5204	12/5/2016	11/11/17 &	11/11/17	4/4/17 &	05/02/2017
			Quincy		7/4/2017	&7/4/2017	3/3/2017	&
			#2077					3/16/2017

903	Carver Park	72110	5211	8/11/2016	11/11/17 &	11/11/17 &	4/4/17 &	05/02/2017
			Scovill		2/1/2017	2/1/2017	3/3/2017	&
			#2110					3/16/2017
903	Carver Park	73694	4908	9/29/2016	11/11/17 &	11/11/17	4/4/17 &	05/02/2017
	MROP		Central J		3/31/2017	&3/31/2017	3/3/2017	&
			3694					3/16/2017
903	Carver Park	72050	2400 East 55	1/8/2017	11/11/2017	11/11/2017	4/4/2017	5/2/2017
911	Scattered Rehab	733001	9815 Benham Up	3/1/2017	8/1/2017	8/1/2017	5/23/2017	5/30/2017
911	Scattered Rehab	733002	9815 Benham Down	3/1/2017	8/1/2017	8/1/2017	5/23/2017	5/30/2017
901	Olde Cedar MROP	880025	2810 Cedar Ave	03/16/17	10/20/17	10/20/17	07/25/17	5/02/2017
906	Oakwood Gardens	740007	24810 Arbutus Rd	08/29/16	12/29/17 & 3/15/2017	12/29/17 & 3/15/2017	5/18/17 & 4/6/2017	05/19/2017 & 5/2/2017
906	Miles Elmarge	410115	10304 Miles	06/06/17	04/30/18	04/30/18	07/03/17	07/17/17
906	Miles Elmarge	410215	10304 Miles	06/08/17	04/30/18	04/30/18	07/03/17	07/17/17
906	Miles Elmarge	410315	10304 Miles	06/09/17	04/30/18	04/30/18	07/03/17	07/17/17
906	Miles Elmarge	410415	10304 Miles	06/12/17	04/30/18	04/30/18	07/03/17	07/17/17
906	Miles Elmarge	410515	10304 Miles	06/20/17	04/30/18	04/30/18	07/03/17	07/17/17
906	Miles Elmarge	410615	10304 Miles	06/04/17	04/30/18	04/30/18	07/03/17	07/17/17
906	Miles Elmarge	410611	10304 Miles	06/10/17	04/30/18	04/30/18	07/03/17	07/17/17
911	Woodhill Scattered (Shale)	752701	2701 E.99th	06/27/16	1/31/18 & 6/20/17 & 10/15/2016	1/31/18 & 6/20/17 & 10/15/2016	6/16/17 &4/4/17 & 8/23/2016	06/22/2017 8/23/2016 & 05/02/2017
911	Scattered Rehab	731044	13217 West Ave	03/28/17	12/28/17	12/28/17	04/04/17	05/02/17

## **Other Capital Grant Programs**

In 2015, CMHA Police department was awarded a grant totaling \$9,461.43 from the Bulletproof Vest Partnership (BVP) program and again in 2016 was awarded \$10,000. Created by the Bulletproof Vest Partnership Grant Act of 1998 is a unique U.S. Department of Justice initiative designed to provide a critical resource to state and local law enforcement. Since 1999, the BVP program has awarded more than 13,000 jurisdictions, a total of \$412 million in federal funds for the purchase of over one million vests.

The BVP is a critical resource for the CMHA Police Department that saves lives. Based on data collected and recorded by BJA staff, in FY 2012, protective vests were directly attributable to saving the lives of at least 33 law enforcement and corrections officers, in 20 different states, an increase 13.7% over FY 2011. At least 14 of those life-saving vests had been purchased, in part, with BVP funds.

The CMHA Police Department, as a requirement of the grant, must have a written "mandatory wear" policy in effect for all uniformed officers while on duty. This policy must be in place for at least all uniformed officers before any funding can be used by the agency. The CMHA Police department has applied for this grant in 2016 and 2017 and will do so again in 2018, should the funds still be available.

In 2015, the CMHA Police Department was awarded a grant totaling \$500,000 under the COPS Hiring Program (CHP) administered by the U.S. Department of Justice and again in 2016 the CMHA Police Department was awarded \$500,000. This competitive grant is open to all state, local, and tribal law enforcement agencies with primary law enforcement authority and provides funding to hire and re-hire entry level career law enforcement officers. A COPS grant is awarded for a period of three years and reviewed annually. The CMHA Police department has applied for this grant in 2016 and 2017 and will do so again in 2018, should the funds become available.

CMHA will continue to be open to grant sources for funding to meet their management and operational needs and as such may apply for Capital Fund Community Facilities Grants and or other Emergency Safety and Security Grants as they become available.

### **Civil Rights Certification**

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulation is included as an attachment to this Plan.

### **Most Recent Fiscal Year Audit**

Fiscal Year Audit of CMHA for the period ended December 31, 2016 was completed in May 2017 and was submitted to the Auditor of State. The independent auditor gave CMHA an unqualified opinion on the 2016 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.

#### **Progress Report**

For Five-Year Plan of 2015-2019, through July 2017:

- 1. Public Housing program:
  - Maintained vacancy rate adjusted for modernization at 4% as of 6/30/16
  - Maintained standard performer designation under PHAS with score of 79% for 2014 under new PHAS scoring system
  - Submitted Choice Neighborhood Implementation application for redevelopment of Cleveland's Central Neighborhood, which includes part of the 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
  - Performed review of ACOP policies and made changes annually for 2017
  - Enhanced community image with many positive media stories, including Sankofa Village, Connect Home, Brick City Theatre, and Heritage View IV
  - Strengthened partnerships with community stakeholders to house homeless families with children, families going through a reunification, and those recovering from substance abuse.
  - Revised after hour emergency response protocol to respond more efficiently to resident maintenance emergencies.

- Utilized technological advances in quality control in the recertification department.
- 2. Housing Choice Voucher (Section 8) program:
  - Maintained high-performer rating for 12<sup>th</sup> straight year from HUD with SEMAP score of 100% in 2016
  - Reached 99.97% utilization
  - Increased VASH vouchers to 566 (from 541) in 2016
  - Awarded an additional 53 Project-based Vouchers for chronically homeless projects
  - Performed review of Administrative Plan policies
  - Continued to build relationships with local municipalities by sharing information through quarterly and weekly reports and addressing specific issues as they arise
  - Working with other local agencies to discuss mobility and how it might benefit our HCVP program participants
  - Continued to expand and upgrade information technology systems to improve tracking, reporting, and analysis of HCVP functions:
    - The Hyland project was completed and entailed scanning all of the work processed by staff in 2015 to date. Over 300,000 documents (2.3 million pages) were scanned by the vendor. Staff is now scanning all work processed and participant files are now online.
    - o A newer version of Onbase, the electronic filing system, was implemented. Documents are individually scanned making it easier to retrieve when warranted.
    - An electronic quality control tracking system was implemented in August 2016 to conduct quality control reviews.
    - o An online Standard Operating Procedures (SOP) was implemented to serve as a guide on department procedures.
- 3. Rental Housing Demonstration (RAD)/Section 8 New Construction (S8NC) program:
  - completed conversion of Bohn Tower to RAD
  - 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), and Carver Park Phase I (279 units)
  - submitted 4% Low Income Housing Tax Credits applications for RAD projects at Midwest Cluster
  - Completed \$7 million dollars of renovations on Ambleside, Quarrytown and Severance

### 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 FY2018 PHA Plan, the Admissions and Continued Occupancy Policy (ACOP), and the HCVP Administrative Plan and was provided with documents for their review and comment. A meeting was held on Wednesday September 6, 2017, with the Executive Committee to review proposed changes.

CMHA did not receive any comments from the Resident Advisory Board.

#### **Challenged Elements**

The following is a summary of the comments that were received verbally and/or in writing during the public review process for the FY2018 PHA Plan, including the CMHA response. In addition to the Public Hearing held on September 25, 2017, CMHA also held a meeting on Thursday September 7, 2017 with our community partners to discuss the proposed changes. Written comments were submitted by the Legal Aid Society and the Housing Research and Advocacy Center.

### **Public Housing Agency (PHA) Plan Comments:**

### **General Comments**

1. **Comment:** As shown in the 2016 report, Housing Voucher Mobility in Cuyahoga County by the Housing Research & Advocacy Center, place-based subsidized housing in Cuyahoga County, across program, contributes to racial segregation. Place-based development by CMHA through programs such as the LIHTC program, RAD program, or project-based Section 8 should promote racial integration to promote residential integration of its program participants. [HRAC]

**Response:** This comment does not pertain to a proposed change in the PHA Plan. Responses will only be given for comments directly related to a proposed change for 2018.

## **Admissions and Continues Occupancy Policy Comments:**

## **Violence Against Women Act**

1. *Comment:* CMHA proposes to extend the protections of VAWA throughout the plans. These proposed changes are commendable and should be adopted. [Legal Aid Society]

Response: Agreed.

- 2. *Comment:* CMHA proposes a number of changes to the ACOP and Admin Plan in accordance with HUD's 2016 final rule regarding the implementation of housing protections authorized in the Violence Against Wo men reauthorization Act of 2013 (VAWA). These changes are commendable and should be implemented. [HRAC] *Response:* Agreed.
- 3. Comment: In sections where notification and victim documentation is required, CMHA should include that language that CMHA will provide victims with the notice of protections provided by VAWA and also a description of CMHA's confidentiality requirements. The following language is proposed:
  CMHA will keep confidential any information that the victim submits in connection with VAWA protections, including keeping confidential the location of a new dwelling unit, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault or stalking against the tenant. CMHA will maintain the confidentiality of the victim's new location in the event the victim receives an emergency transfer related to VAWA protections. CMHA will not disclose or release or enter into any shared database any personally identifying information or individual information collected in connection with VAWA protections requested or denied except to the extent that the disclosure is:

Requested or consented to in writing by the victim in a time-limited release;

Required for use in an eviction proceeding or termination of assistance or; Otherwise required by applicable law. [Legal Aid Society]

**Response:** The ACOP is merely an expression of policy and does not contain all of the measures required by law or by sound business practice. This language is better placed in the transfer procedure.

### Section 2.01 B5 – Statement of Policy

4. *Comment:* CMHA's proposed change #20 to the ACOP replaces the term "alien" with the term "immigrant". This change is commendable and should be implemented. This revision should also be incorporated into Chapter 2, Section 2.01 B 5 where the same phrase occurs. [HRAC]

**Response:** Agreed. Section 2.01 B 5 will be changed to "Certification or evidence of U.S. Citizenship or eligible immigrant status;"

### **HCVP Administrative Plan comments**

## **Violence Against Women Act**

Comment: In sections where notification and victim documentation is required, CMHA should include that
language that CMHA will provide victims with the notice of protections provided by VAWA and also a
description of CMHA's confidentiality requirements. The following language is proposed:
CMHA will keep confidential any information that the victim submits in connection with VAWA protections,
including keeping confidential the location of a new dwelling unit, if one is provided, from the person(s) that

committed an act(s) of domestic violence, dating violence, sexual assault or stalking against the tenant. CMHA will maintain the confidentiality of the victim's new location in the event the victim receives an emergency transfer related to VAWA protections. CMHA will not disclose or release or enter into any shared database any personally identifying information or individual information collected in connection with VAWA protections requested or denied except to the extent that the disclosure is:

- i. Requested or consented to in writing by the victim in a time-limited release;
- ii. Required for use in an eviction proceeding or termination of assistance or;
- iii. Otherwise required by applicable law.

[Legal Aid Society]

**Response:** The HCVP Administrative Plan is merely an expression of policy and does not contain all of the measures required by law or by sound business practice. This language is better placed in the transfer procedure.

## Mobility and Affirmatively Furthering Fair Housing

- 2. **Comment:** CMHA has engaged in the exploration of a mobility program. CMHA should implement a mobility program in order to affirmatively further fair housing. While CMHA's Admin Plan currently incorporates outreach to families and owners in order to advance housing opportunities outside of areas of minority and poverty concentration, these efforts should be developed into a mobility program. CMHA policies should align with efforts to support mobility and choice for families. Critical components of a mobility program implemented by CMHA should include:
  - a. Comprehensive mobility services to support families: counseling for families, financial assistance including security deposit and application fees: extension of the 120 day search time for identifying a unit;
  - b. Landlord recruitment: lifting barriers that landlords perceive, expedited inspection processes; bonuses to incentivize participation in the HCVP and a CMHA mobility liaison; and,
  - c. Adoption of the Small Area Fair Market Rent to promote residential integration,

Legal Aid welcomes the opportunity to continue to engage in the discussion and development of a mobility program. [Legal Aid Society]

**Response:** This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

#### Chapter 1, Page 13 – Reasonable Accommodations Policy

3. *Comment:* CMHA's proposed change to #4 to the Admin Plan replaces the word "or" with the word "and" in the considering reasonable accommodation request. This change is consistent with federal fair housing law and Section 504 of the Rehabilitation Act of 1973 and should be incorporated. [HRAC] *Response:* Agreed.

### Chapter 1, Page 16 – Reasonable Accommodations Policy

4. *Comment:* CMHA's proposed change to #5 to the Admin Plan eliminates the requirement to provide identifying information on a specific live-in-aide (LIA) at the time permission for the LIA is applied for. This change is commendable and should be incorporated. [HRAC]

Response: Agreed.

### Chapter 9, Page 91 – Lease Review

5. Comment: CMHA's proposed change to #37 of the Admin Plan indicates in part "CMHA" will not approve separate agreements for modifications to the unit for persons with disabilities." Clarification as to the reason for this statement may be helpful to participants. As fair housing laws do not require housing providers not covered by Section 504 of the Rehabilitation Act of 1973 (such as most landlords participating in the HCVP) to pay for, only permit, reasonable modifications, permitting a participant to agree to repay a housing provider who modifies their unit may be the only available means by which a participant can finance a necessary modification. [HRAC] Response: CMHA will review its policy and its change may be made in further revisions of the Administrative Plan.

## Chapter 19, Page 157 – Reasonable Accommodation Requests, Reviews, Appeals and Hearings

6. *Comment:* CMHA's proposed change #55 to the Admin Plan makes explicit that the Reasonable Accommodation request process applies to both Applicants and Participants in the HCVP. This change is consistent with fair housing law and HUD regulations and should be incorporated. [HRAC[ *Response:* Agreed.

### **General Comments**

7. *Comment:* CMHA should immediately adopt and implement Small Area Fair Market Rent to promote residential integration of its program participants. As shown in the 2016 report, *Housing Voucher Mobility in Cuyahoga County* by the Housing Research & Advocacy Center, existing CMHA payment standards (county-wide FMR calculated at the metropolitan statistical area level) contribute to racial segregation and the concentration of households using HCVs. Small Area FMR is a cost-neutral solution to making all areas in Cuyahoga County open to HCVP participants. [HRAC]

**Response:** This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

8. *Comment:* CMHA should pursue a mobility counseling program that will facilitate moves of HCVP participants to areas with low poverty and high-performing schools as well as incentivize landlords in areas of low poverty and high-performing schools to participate in the HCVP to promote residential integration of its program participants. [HRAC]

**Response:** This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

9. *Comment:* CMHA should identify opportunity target areas with low poverty and high-performing schools and implement a security deposit assistance program for movers to targeted areas to facilitate moves to higher-cost areas with low poverty and high-performing schools to promote residential integration of its program participants. [HRAC]

**Response:** This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

10. *Comment:* CMHA should enhance the usability of educational materials for HCV participants wishing to move into low-poverty areas and inform all participants of their fair housing rights to promote residential integration of its program participants. [HRAC]

**Response:** This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

11. *Comment:* CMHA should recruit landlords for HCVP participation in areas with low poverty and high-performing schools to promote residential integration of its program participants, in addition to such measures undertaken to affirmatively further fair housing in the FSS program. [HRAC]

**Response:** This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

12. *Comment:* CMHA should ensure that housing lists on HousingCleveland.com and GoSection8.com are up to date. [HRAC]

**Response:** CMHA appreciates the comment regarding the housing listings however this was not a proposed change to the HCVP Administrative Plan. CMHA does not submit listings to HousingCleveland.com or GoSection8.com; rather this is done by the independent landlords who wish to advertise their rentals. CMHA does not control the submissions by the landlords and this is not within the control of the agency.

13. *Comment:* CMHA should grant extended search times for HCVP participants moving into low-poverty areas to promote residential integration of its program participants. [HRAC]

**Response:** This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

14. *Comment:* CMHA should reject its 2006 Memorandum of Understanding with the inner ring suburbs regarding HCVP households. This MOU states that CMHA will provide municipalities with the addresses of all subsidized households residing in a given municipality, it requires municipalities to report criminal activity to CMHA, and stipulates that CMHA will take action on reporting by municipalities. Providing such a list criminalizes HCVP participants and invites municipalities to target subsidized households for harassment and use the administrative functions of CMHA as well as the threat of loss of subsidy as specific forms of harassment. Due to the racial makeup of HCVP households participating in CMHA's voucher program, any differential treatment by CMHA or any municipality of a household participating in the HCVP, as compared to any other unsubsidized rental household within that municipality, could be a violation of the federal Fair Housing Act. [HRAC] *Response:* This comment does not pertain to a proposed change in the HCVP Administrative Plan. Responses will only be given for comments directly related to a proposed change for 2018.

## **Certification by State or Local Official**

Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, has been submitted as an attachment to this PHA Plan. CMHA plans to collaborate with local governments to conduct a regional Assessment of Fair Housing Pursuant to Final Rule at 24 CFR Part 5 regarding a grantee's obligation to Affirmatively Further Fair Housing (AFFH).

## C. Statement of Capital Improvements

## **Capital Improvements**

- See HUD Form -50075.2 approved by HUD on 08/04/2016 for 2016-20, which included the following items;
  - o 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
  - o 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 Elmarge
    - 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
  - o Dwelling equipment appliances
  - Agency-wide non-dwelling structures, including plumbing, electrical, and structural repairs to various community and daycare facilities
  - o Non-dwelling equipment
  - Resident relocation costs
  - Annual debt service on two Capital Fund Financing Program (CFFP) bond leveraging