

**Clermont Metropolitan Housing Authority (CMHA)
Housing Choice Voucher (HCV)
Administrative Plan
Summary of Changes
10/1/2020 to 9/30/2021**

1) Reopening the Waiting List Page 4 – 6

Current: The PHA will give public notice by publishing relevant information in suitable media outlines including, but not limited to: Community Press Newspaper & Posting on the website.

Amended: The PHA will give public notice by publishing relevant information in suitable media outlines including, but not limited to: One Local Newspaper & Posting on the PHA Website.

2) Targeted Funding [24 CFR 982.204(e)]

Current: The PHA administers the following types of targeted funding: Nonelderly and disabled and VASH

Amended: CMHA was awarded funding for a specified category of families on the waiting list for Non-Elderly Disabled (NED) and HUD-VASH Families. The PHA must use this funding only to assist the families that qualify within the specified category.

PHA Policy

The PHA administers the following types of targeted funding:

Non-Elderly Disabled and HUD-VASH Families

For the Non-Elderly Disabled Program, CMHA can only issue a voucher to an income-eligible family whose head of household, spouse or co-head is non-elderly (under age 62) and disabled. Families whose only disabled family member is a child is not eligible per PIH 2013-19.

For the HUD-VASH Program, CMHA receives referred families who are deemed eligible by the Veteran Administration.

3) Selection Method Local Preferences (24 CFR 960.206) 4-III C. Pages 4-11

Current: The PHA will use the following local preferences:

1. The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.
2. The PHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who have either been referred by a partnering service agency or consortia or is seeking an emergency transfer under VAWA from the PHA's public housing program or other covered housing program operated by the PHA.

The PHA will work with the following partnering service agencies: YWCA, James Sauls Shelter, House of Peace and Greater Cincinnati Behavioral Health Services (GCBHS).

The applicant must certify that the abuser will not reside with the applicant unless the PHA gives prior written approval.

The PHA will first assist families that have been terminated from the HCV program due to insufficient funding then assist families that qualify for the VAWA preference.

Amended: CMHA will use the following local preferences and points (which are cumulative):

1. CMHA will offer a preference to any participant family that has been terminated from its HCV program due to insufficient program funding.** (100 Pts)
2. CMHA will offer a preference to any applicant family whose voucher was terminated due to insufficient program funding.** (95 Pts).
3. Emergency transfers from CMHA’s Public Housing Program or other covered housing program operated by CMHA.** (90 Pts)
4. CMHA will accept *up to 30 referrals a calendar year* from YWCA to provide housing opportunities to homeless families in Clermont County.** (85 Pts)
5. CMHA will accept *up to 30 referrals a calendar year* from James Sauls Shelter to provide housing opportunities to homeless families in Clermont County.** (85 Pts)
6. CMHA will accept *up to 30 referrals a calendar year* from House of Peace to provide housing opportunities to families who are homeless in Clermont County.** (85 Pts)
7. CMHA will accept *up to 30 referrals a calendar year* from Greater Cincinnati Behavioral Health Services (GCBHS) to provide housing opportunities to disabled families in Clermont County.** (85 Pts)
8. CMHA will accept *up to 30 referrals a calendar year* from Clermont Senior Services to provide housing opportunities to elderly families in Clermont County.** (85 Pts)
9. Homeless Preference (25 Pts)
10. Veteran or Surviving Spouse (10 Pts)
11. CMHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who have either been referred by a partnering service agency or consortia. *The applicant must certify that the abuser will not reside with the applicant unless CMHA gives prior written approval.* (9 Pts)
12. Handicapped/Disabled Family (7 Pts)
13. Elderly Preference (2 Pts)
14. Rent Burden (1 Pt)

***Families with these preferences can be added even if the HCV Wait List is closed, but no families will be drawn from the Wait List if there is not funding available.*

HCV Wait List Sort

The wait list is sorted first by preference points then date and time of application. This selection method permits families with higher preference points to be drawn before families with lower preference points.

Verification of Preference

Proof of preference will be verified at the time the family reaches the top of the wait list. When a family who reaches the top of the wait list with a preference is unable to verify that they had the preference at the time of the initial pre-application, the preference will be removed, and the family placed back on the waiting list in date and time order.

4) Minimum Rent (Chapter 6), Section 6.III.A, Pages 6-48 to Pages 6-54.

Current: The minimum rent for this locality is \$0.

Amended: The minimum rent for this locality is \$50. This will become effective on the first annual re-examination on or after 1/1/2021, due to COVID19 Consideration.

- 5) Applying Decreased Payment Standards (24 CFR 982.505; 982.503(b)) Pages 6-55 to 6-56**
Current: CMHA changes the payment standard at the first annual recertification.
Amended: CMHA chooses to reduce the payment standard for families currently under HAP contract, the initial reduction to the payment standard may not be applied any earlier than the effective date of the family’s second regular annual reexamination following the effective date of the decrease in the payment standard amount.
- 6) Changes in Lease or Rent (24 CFR 982.308) Page 9-14**
Current: Rent increases will go into effect on the tenant’s anniversary date following receipt of an approved rent increase request or on the date specified by the owner, whichever is later.
Amended: Rent adjustments will go into effect after the initial term of the lease and with a proper 30-day notice to both parties. The owner will not be able to submit another rent adjustment request for 12 months since the last rent adjustment submission. CMHA will not retain copies of rent adjustment requests that are submitted early by the owner.
- 7) Interim Reexaminations (24 CFR 982.516)) Pages 11-8 to 11-15**
Current: Changes in household composition and changes in household income must be reported in writing to CMHA within 10 business days.
Amended: Changes in household composition and changes in household income must be reported in writing to CMHA within 30 business days.
- 8) Processing the Interim Reexamination Effective Dates (24 CFR 982.516)) Pages 11-13**
Current: Verifications must be received before the 20th of each month in order to decrease rent for the following month.
Amended: The decrease will be effective on the first day of the month following the month in which the change was reported. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively.
- 9) Streamline Voluntary Compliance Chapter 17**
Current: No Current information in the HCV Administrative Plan.
Amended: Streamlined Voluntary Conversions of Last Remaining Projects of Small Public Housing Agencies Section 22 of the United States Housing Act of 1937 and its implementing regulations at 24 CFR part 972, subpart B, authorize Public Housing Agencies (PHAs) to convert public housing to tenant-based assistance. HUD is authorized under Section 22(b)(3) to waive the conversion assessment or require a streamlined conversion assessment for “any public housing project or class of public housing projects.” Conversion to Housing Choice Vouchers (HCVs) gives small PHAs greater flexibility to respond to local needs, allows them to pursue private financing, and provides greater housing choice and mobility to assisted households. Section 22(c) permits PHAs to convert a Section 9 public housing project (or portion thereof) to HCV assistance if the PHA demonstrates conversion 1) is not more expensive than continuing to operate as public housing; 2) principally benefits residents, the PHA, and the community; and 3) has no adverse effect on the availability of affordable housing in the community.
- If a project continues to operate as rental housing, the PHA (or subsequent owner) must allow the families to remain in their units using the HCV in the form of tenant-based assistance (24 CFR 972.230(g)(ii)(E)). If a PHA plans to project-base a property in accordance with the Section 8 project-based voucher (PBV) program, all applicable PBV program requirements apply.

Because section 22(d)(4)(C) of the 1937 Act requires that families be provided with the option to remain in their unit using tenant-based HCV assistance when a property will be used as housing after conversion, in order to provide project-based (PBV) assistance at a property as part of or immediately after conversion, families must voluntarily consent to the PBV assistance. Tenant consent means a family, after being fully informed of its options, voluntarily giving up the ability to receive a tenant-based HCV voucher (that it could use at the property or off-site in the private market) in order to be assisted under a PBV contract at the property.

The informed and voluntary consent a family gives is to forego tenant-based HCV assistance (for use at the property or in the private market). If a family fails to consent to the PBV assistance and chooses to remain using tenant-based HCV assistance, that family's unit is excluded from the PBV HAP until the family moves out or consents to switching to PBV assistance.

environmental review conducted under 24 CFR 6 Note that three HOTMA exceptions may apply

- (1) a percentage cap exception where public housing units approved for conversion may not count toward the PBV program unit limitation (PHA-wide);
- (2) an exception to the income-mixing requirement where public housing units approved for conversion may not count toward the required project PBV cap; and
- (3) a competitive process exception where a PHA may be able to attach PBVs without following a competitive process to a former Section 9 public housing project in which it has an ownership interest or over which it has control, and for which the PHA is engaged in an initiative to improve, develop, or replace the public housing property or site.

The PHA may not demolish or dispose of units or property until completion of the environmental review. See 24 CFR 972.212(b). PHAs are responsible for providing to the Responsible Entity or local Office of Public Housing (Field Office) a full description of the activities (including relocations, demolition, disposition and planned future use as described in response to section 4(E)) to comply with aggregation requirements. Site re-use is not limited to future actions by the PHA, but encompasses future re-use, including use of the project as rental housing after conversion. Even if there are no planned physical alterations and the project is categorically excluded from the National Environmental Policy Act (NEPA), a Categorically Excluded Subject To (CEST) environmental review addressing related environmental laws and authorities in Sections 58.5 and 58.6 or 50.4 needs to be completed. It is possible the environmental review may reveal risks or circumstances that do not allow for approval of the conversion plan.