



Clermont Metropolitan Housing Authority

65 South Market Street | Batavia, Ohio 45103

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www.clermontmha.org

Clermont Metropolitan Housing Authority (CMHA) HCV Administrative Plan Summary of Changes 10/1/2023 to 09/30/2024

Reporting Changes in Family Circumstances, page 4-10

Current: While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address and phone number.

Amended: While the family is on the waiting list, the family inform the PHA, within 10 business days of changes in family size or composition, preference status, or contact information, including current residence, mailing address, email address, and phone number.

Purging the Waiting List, page 4-10

Current: To update the waiting list, the PHA will send an interest letter/application packet via first class mail to families who have reached the top of the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This updated request will be sent to the last known address that the PHA has on record for the family.

Amended: To update the waiting list, the PHA will send an interest letter/application packet either via an electronic system (if email has been provided) or via first class mail to families who have reached the top of the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This updated request will be sent to the last known email address or the last known address that the PHA has on record for the family. If the email is returned as not a valid email or per the family's request, the interest letter/application packet will be sent via first class mail to the last address that the PHA has on record for the family.

Local Preferences [24 CFR 982.207; HCV p. 4-16], page 4-15 – 4-16

Current: not currently in the policy.

Amended: CMHA will accept up to 15 referrals a calendar year from Clermont County Public Defenders office to provide housing opportunities to homeless families in Clermont County (85 points).

Current: The PHA will work with the following partner agencies: YWCA, Clermont County Community Services through the James Sauls Homeless Shelter, House of Peace, Clermont County Senior Services, Greater Cincinnati Behavioral Health, Brightview Health and Clermont County Board of Developmental Disabilities.

Amended: The PHA will work with the following partner agencies: YWCA, Clermont County Community Services, House of Peace, Clermont County Senior Services, Greater Cincinnati Behavioral Health, Brightview Health, Clermont County Board of Developmental Disabilities, and Clermont County Public Defender's office.



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Current: 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)

Amended: CMHA will accept up to 40 referrals a calendar year from Greater Cincinnati Behavioral Health Services (GCBHS) to provide housing opportunities to disabled families in Clermont County. ** (85 Pts)

Definition of Homeless Preference, page 4-16

Current: not currently defined in policy.

Amended: Adding HUD's definition of homeless. A person is considered homeless only when he/she resides in one of the places described below.

In places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings (on the street), in an emergency shelter, in transitional or supportive housing for homeless persons who originally came from the streets or emergency shelters, in any of the above places but is spending a short time (up to 30 consecutive days) in a hospital or other institution, is being evicted within a week from a private dwelling unit and no subsequent residence has been identified and lacks resources and support networks needed to obtain housing, is being discharged within a week from an institution, such as a mental health or substance abuse treatment facility or a jail/prison, in which the person has been a resident for more than 30 consecutive days and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing, is fleeing a domestic violence housing situation and no subsequent residence has been identified and lacks the resources and support networks needed to obtain housing. The following does not meet the HUD definition of homeless: persons living in housing, even though they are paying an excessive amount for their housing, the housing is substandard and in need of repair, or the housing is crowded, persons living with relatives or friends, persons staying in a motel, including pay by the week motels, persons living in a board and care, adult congregate living facility, or similar place, persons being discharged from an institution that is required to provide or arrange housing upon release, and wards of the state, although youth in foster care may receive needed supportive services which supplements, but does not substitute for, the state's assistance.

Notification of and Participation in the Annual Reexamination Process, page 11-3

Current: Families generally are required to participate in an annual reexamination interview, which must be attended by any adult (over 18) in the household. This interview may also be conducted by completing an Annual Reexamination packet by mail. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation. Notification of annual reexamination interviews will be sent by first class mail and will contain the date, time, and location of the interview. In addition, it



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will inform the family of the information and documentation that must be brought to the interview.

Amended: Families generally are required to participate in an annual reexamination interview, which must be attended by any adult (over 18) in the household. This interview may also be conducted by completing an Annual Reexamination packet by mail or electronic system (if email has been provided). If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation. Notification of annual reexamination interviews will be sent by first class mail or via an electronic system (if email has been provided) and will contain the date, time, and location of the interview. If the email is returned as not a valid email address or per the family's request, the Annual Reexamination packet will be sent via first class mail to the address the PHA has on record for the family. In addition, it will inform the family of the information and documentation that must be brought to the interview.

Use of Illegal Drugs and Alcohol Abuse, page 12-5

Current: The PHA will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. The PHA will terminate assistance if any household member's abuse or pattern of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents. The PHA will consider all credible evidence, including, but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.

Amended: The PHA will terminate a family's assistance if any household member or their guest is currently engaged in any illegal use of a drug or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. The PHA will terminate assistance if any household member or their guest's abuse or pattern of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents. The PHA will consider all credible evidence, including, but not limited to, any record of arrests, convictions, or eviction of household members or their guests related to the use of illegal drugs or abuse of alcohol.

Drug Related and Violent Criminal Activity [24 CFR 5.100], page 12-6

Current: The PHA will terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug related or violent criminal activity during participation in the HCV program. The PHA will consider all credible evidence, including, but not limited to, any record of arrests, convictions, or eviction of household members related to drug related or violent criminal activity, and any eviction or notice to evict based on drug related or violent criminal activity.



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Amended: The PHA will terminate a family's assistance if any household member or their guest has violated the family's obligation not to engage in any drug related or violent criminal activity during participation in the HCV program. The PHA will consider all credible evidence, including, but not limited to, any record of arrests, convictions, or eviction of household members or their guests related to drug related or violent criminal activity, and any eviction or notice to evict based on drug related or violent criminal activity.

Exhibit 12-1: Statement of Family Obligation, page 12-25

Current: Family members must not engage in drug related, criminal activity or violent criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

Amended: Family members or their guests must not engage in drug related, criminal activity or violent criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

Current: Members of the household must not engage in abuse of alcohol in a way that threatens health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

Amended: Members of the household or their guests must not engage in abuse of alcohol in a way that threatens health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.



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Highlights of Final Rule Implementing Sections 102, 103, 104 of HOTMA

The Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) delivers important benefits to tenants and reduces administrative burdens for public housing agencies (PHAs), multifamily housing owners (MFH owners), and participating jurisdictions. The highlights of the Final Rule are outlined below.

Section 102: Income Reviews

- **Fewer Interim Reexaminations**: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.
- **Streamlined Verifications**: Several provisions will streamline the verification process for housing providers.
 - **Adults Only Need to Sign Consent Form Once**: HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.
 - **Use of Income Determinations from Other Programs**: HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations.
 - **Review of EIV Not Required at Interim Reexamination**: HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination, significantly reducing administrative burden.
- **Increased Standard Deduction for Elderly/Disabled Households**: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.
- **Additional Income Exclusions**: The rule codifies additional income and asset exclusions, including:
 - Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home
 - Veterans' aide and attendant care
 - Distributions of principal from non-revocable trusts, including Special Needs Trusts.
- **Threshold for Claiming Medical/Disability Expenses Increased**: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.
- **Higher Threshold for Imputing Asset Income**: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.



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- **Hardship Relief**: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

Section 103: Public Housing Income Limit

- **Public Housing Income Limitation**: HOTMA imposes continued program participation limits for families exceeding the statutory income limitation in the Public Housing program, also known as the “over-income” provision.

Section 104: Asset Limits

- **Asset Limitation**: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.

- **Exclusion of Retirement and Educational Savings Accounts**: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.

- **Self-Certification of Assets under \$50,000**: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.

Cross-Cutting

- **Adjustments for Inflation**: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance. The current deduction amounts have never been adjusted.