

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

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## Cuyahoga Metropolitan Housing Authority

# Public Housing Agency Plan

5 Year Plan for Fiscal Years 2000 - 2004  
Annual Plan for Fiscal Year 2004

December 15, 2003  
Amended May 5, 2004 (4.B.1.a)

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

**PHA Plan  
Agency Identification**

**PHA Name:** Cuyahoga Metropolitan Housing Authority

**PHA Number:** OH12F003

**PHA Fiscal Year Beginning:** 1/2004

**Public Access to Information**

**Information regarding any activities outlined in this plan can be obtained by contacting:**

- Main administrative office of the PHA  
1441 West 25<sup>th</sup> Street  
Cleveland, Ohio 44113  
Contact: Scott Pollock (216-348-5911)
- PHA development management offices
- PHA local offices

**Display Locations For PHA Plans and Supporting Documents**

The PHA Plans (including attachments) are available for public inspection at:

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website: [www.cmha.net](http://www.cmha.net)
- Other (list below):

PHA Plan Supporting Documents are available for inspection at:

- Main business office of the PHA
- PHA development management offices
- Other (list below)

**FIVE-YEAR PLAN**  
**PHA FISCAL YEARS 2000 - 2004**  
[24 CFR Part 903.5]

**A. Mission**

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

The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

The PHA's mission is:

To provide quality affordable housing to eligible low-income residents of Cuyahoga County and to establish the community partnerships necessary for CMHA residents to achieve personal goals related to: literacy and education; health and wellness; and job training and employment leading to economic self sufficiency, and homeownership. We strive to support this mission by ensuring integrity in our operational and financial management while providing:

- **Good, stable housing** through diligent upkeep, preventative maintenance and substantial modernization of public housing properties, new development, and high utilization of Section 8 vouchers as well as recruiting of good private landlords;
- **Safe environment** where residents live and employees work;
- **Social services** delivered directly and through community partners intended to empower residents and to improve their quality of life; and
- **Human resource training and staff development** to enable employees to be highly productive, efficient, and both results and customer service oriented.

## **B. Goals**

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

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

- PHA Goal: Expand the supply of assisted housing  
Objectives:
  - Apply for additional rental vouchers:  
Maximum number based on availability of funding and units within the private rental market
  - Reduce public housing vacancies:  
Implement a plan to reduce vacancy rate, adjusted for modernization, to 8% in 2000 and 2001, 7% in 2002, 4% in 2003, and then maintaining a 3% vacancy rate, adjusted for modernization, in 2004 and beyond.
  - Leverage private or other public funds to create additional housing opportunities:  
Initial Tax Credit Development Project submission in 2001  
Initial Tax Credit Project Completion within 2 years of award  
Continuing sponsorship/intermediary for project based affordable housing development and preservation
  - Acquire or build units or developments:  
Implement replacement housing component of HOPE VI based upon the Revitalization Plans for Carver Park and Riverview during 2002-2004  
Develop replacement housing pursuant to the revised Revitalization Plan for King Kennedy North during 2002-2006
  - Other:  
HOPE VI application submission in 2001  
Achieve/maintain 98% Section 8 program lease-up rate in years 2000-2004  
Landlord outreach to support deconcentration of tenant based voucher program
  
- PHA Goal: Improve the quality of assisted housing  
Objectives:
  - Improve public housing management:  
Maintain standard performance level and improve scores as measured by PHAS indicators
  - Improve voucher management:

- Maintain high performer level as measured by SEMAP scoring
  - Increase customer satisfaction:
    - Maintain standard performance level and improve scores on PHAS Resident Satisfaction indicator
  - Concentrate on efforts to improve specific management functions:
    - Address all PHAS/SEMAP deficient indicators within one year or in accordance to a timeline specified in a corrective action plan
  - Renovate or modernize public housing units:
    - Revitalization of public housing stock completed for (3) existing HOPE VI projects by 2004
    - Evaluate housing stock as part of Asset Management study in 2001
  - Demolish or dispose of obsolete public housing:
    - Timely completion of four planned demolition projects
    - Housing Stock Conversion Assessment in 2001
  - Provide replacement public housing:
    - Tax credit development and homeownership initiatives during years 2001-2004
    - Implement a project based voucher program by 2002
  - Provide replacement vouchers:
    - Continue to effectively administer replacement housing and HUD enforcement action voucher program
  - Other: (list below)
  
- PHA Goal: Increase assisted housing choices
  - Objectives:
    - Provide voucher mobility counseling:
      - Apply for mobility vouchers, if offered
    - Conduct outreach efforts to potential voucher landlords
      - Expand the Section 8 marketing plan in 2002
      - Implement and upgrade interactive landlord/unit database web site 2000-2004
    - Increase voucher payment standards
      - Conduct annual assessment and revisions in each year 2001-2004
      - Annual reporting of payment standards and rent burden beginning in 2000
    - Implement voucher homeownership program:
      - Feasibility study in 2001
      - Implement a Section 8 homeownership program no later than 2002
    - Implement public housing or other homeownership programs:
      - Implement a public housing scattered site homeownership program no later than 2002
    - Implement public housing site-based waiting lists:
      - Complete plan in 2000 and implement in 2001
    - Convert public housing to vouchers:

- Complete Housing Conversion Assessment (Section 22 & 33) by 10/2001, and implement results as required
- Other:
  - Develop plans for replacement of housing demolition in accordance with CMHA “hard replacement” policy

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

- PHA Goal: Provide an improved living environment
  - Objectives:
    - Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
      - Establish goal setting and annual performance measurement system in accordance with HUD Final Rule implementation in 2001-2004
    - Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
      - Provide assessment, incentive awareness and referral services to under/unemployed new admissions
    - Implement public housing security improvements:
      - Comprehensive security improvement study and plan by 2000
      - Plan implementation and performance measurement system during 2001-2004
    - Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
      - Designated housing study and plan during 2000
      - Plan approval and implementation during 2001
    - Other:
      - Implement measures to deconcentrate poverty through prioritized focus on the lowest income developments by increasing average household incomes of existing families (2 sites per year)

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

- PHA Goal: Promote self-sufficiency and asset development of assisted households
  - Objectives:
    - Increase the number and percentage of employed persons in assisted families:
      - Working family preference and ceiling rent incentives by 2000
      - Meet Section 3 program resident opportunity goals during 2000-2004

- Provide or attract supportive services to improve assistance recipients' employability:
  - Maintain and strengthen existing supportive service relationships
  - Effective implementation of public housing Self Sufficiency and Jobs Plus Programs during 2000-2001
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
  - Assess comprehensiveness and resident satisfaction with existing supportive services network during 2000
  - Enter into agreements to fill identified service gaps during 2001-2004
  - Implement the Riverview Manor supportive housing program and increase program usage during 2001-2004
- Other: (list below)
  - Maximize enrollment in Section 8 FSS Program

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

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:
  - Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
    - Maintain existing relationships and encourage coordination of fair housing and equal opportunity agencies
    - Develop plan and implement actions to address impediments to fair housing findings during 2000-2004 (see Attachment J)
  - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
    - Develop suitable living environment plans for each development
    - Implement plans and measure performance 2001
  - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
    - Perform ADA assessment to quantify and qualify accessible housing stock supply within the Authority during 2001
    - Analyze wait list to quantify and qualify accessible housing stock demand during 2001, and identify resources to fill demand
    - Maintain on-going program and progress reporting 2002-2004
  - Other: (list below)

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

**Annual PHA Plan**  
**PHA Fiscal Year 2004**  
[24 CFR Part 903.7]

**i. Annual Plan Type:**

Select which type of Annual Plan the PHA will submit.

**Standard Plan**

**Streamlined Plan:**

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

**Troubled Agency Plan**

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

[24 CFR Part 903.7 9 (r)]

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

This Executive Summary contains a brief overview of the information that the Cuyahoga Metropolitan Housing Authority (CMHA) is submitting in the Public Housing Agency Plan (PHA Plan) for FY2004, and relates the Annual PHA Plan programs and activities to CMHA's mission and goals as described in the Five-year Plan. This PHA Plan was prepared in collaboration with a Resident Advisory Board comprised of Public Housing and Section 8 program participants. Their participation and comments is documented in Attachment G. A draft of this PHA Plan was made available for public comment, including the CMHA website, and notice of a Public Hearing was published on August 3, 2003. The Public Hearing was conducted on September 17, 2003 by the Board of Commissioners to obtain comments, which are documented with a response in Attachment I. The final FY2004 PHA Plan was adopted by the CMHA Board of Commissioners on October 1, 2003.

CMHA is one of the largest public housing authorities in the country, and serves the housing needs of low-income families in Cuyahoga County of Ohio. CMHA is considered a standard-performing housing authority for the 10,294 units of public housing that it owns and manages, and a high-performing housing authority for over 12,836 units of Section 8 tenant-based assistance that it administers. In accordance with HUD guidelines, this document provides a response for all of the sections included in a PHA Plan submission, as specified in the Table of Contents, and includes several attachments with supplemental information.

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 relied heavily on the Consolidated Plans submitted by entitlement cities within our jurisdiction, which are based on 1990 census data and can be briefly summarized as follows.

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.

As indicated in the Housing Needs tables in Section 1A of the Annual Plan, renters with incomes less than 30% of the area median income (AMI) have a great cost burden in regards to housing affordability in Cleveland, East Cleveland and the Cuyahoga Urban County. In Cleveland, 73% of renters earning less than 30% AMI pay more than 30% of income for rent and utilities. In East Cleveland, 83% of renters earning less than 30% AMI pay more than 30% income for rent and utilities. In the Cuyahoga Urban County, which comprises most of the suburban population, 78% of its renters earning less than 30% AMI pay more than 30% of income for rent and utilities.

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 rental housing for families with disabilities is limited, and that there is a need for assisted and supportive services rental units for elderly families.

As of July 2003, the Section 8 waiting list had 6,360 households, which should be sufficient to carry the program through 2004 without opening the waiting list. The Public Housing waiting list is not closed and consisted of 8,569 families as of July 2003. Of these families, 84% were extremely low income (less than 30% of AMI), 39% have children, 21% have disabilities, and 2% are elderly.

*Financial Resources* of approximately \$242 million will be available to CMHA in FY2004 to operate and/or administer a variety of low-income housing programs. Based upon FY2003 funding levels, CMHA anticipates receiving funding or funding commitments of about \$169 million from HUD during FY2004. Of that amount, \$83 million will be for direct housing assistance payments to Section 8 landlords, and about \$45 million is estimated as subsidy to support the management and maintenance operations of the public housing program. About \$26 million is anticipated to be awarded for public housing capital improvements through the Capital Fund Program (CFP) in addition to \$3 million from the Replacement Housing Fund (RHF).

Unobligated balances from prior year grants amount to \$52 million. Many of these grant awards from HUD, such as HOPE VI, CFP, RHF, and PHDEP, have multi-year obligation and expenditure periods, so only a portion of this amount will be used during 2004. Another \$20 million of funding from other sources is also expected, of which \$11.7 million is anticipated as rental income from residents. The Section 8

program will generate \$7.4 million in administrative fees, most of which is used for the administration of the Section 8 program. CMHA manages three Section 8 New Construction properties that will generate \$1.3 million in revenues other than subsidy, and CMHA anticipates interest income of about \$500,000 in 2004.

***Policies on Eligibility, Selection and Admissions*** are summarized in Section 3 of the Annual Plan. Based upon the requirements of the Quality Housing and Work Responsibility Act (QHWRA) of 1998, CMHA adopted a new Admissions and Continued Occupancy Policy (ACOP) and revised Dwelling Lease for 2001. For 2004, CMHA initially proposed a policy change to the public housing admissions preferences by reducing the current six preferences, which are ranked from one to six, to three preferences (successful completion of substance abuse treatment program, involuntary displacement and veterans) that would be equally weighted. Before the Public Hearing, CMHA added back the preferences for homelessness and working families, and will weigh all of them equally.

Under deconcentration of poverty, CMHA has identified three estates (Woodhill, Cedar Extension and Garden Valley) where the average income falls below 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. CMHA plans on continuing to meet the QHWRA income targeting requirements of ensuring that 40% of new public housing occupancy and 75% of Section 8 new admissions will be given to families with incomes at or below 30% of the average median income. The CMHA Section 8 program continues to grow and has attained its highest level of occupancy at over 12,830 families and highest utilization rate of 100%. CMHA anticipates minimal growth in the voucher program during 2004 as a result of only receiving an additional 50 vouchers during 2003. The Section 8 program has admissions preferences for special needs families referred by the Gateway program, and certain under-housed or disabled families in the Moderate Rehabilitation program.

***Rent Determination Policies*** for the Public Housing and Section 8 program were revised to meet the requirements of QHWRA in 2001 as part of the new ACOP and revised Section 8 Administrative Plan. No rent determination policy changes to these documents are planned for 2004. The public housing program will maintain its minimum rent policy at \$25 per month with the "hardship" conditions prescribed by QHWRA while the Section 8 program will maintain its \$0 minimum rent policy. CMHA adopted the new flat rent structure for public housing as of June 2002, and the transition from ceiling rents should be completed by 2004. CMHA has implemented the mandatory exclusions from adjusted income determination for employment and increases in earned income.

***Operations and Management Policies*** for the Public Housing program continue to be reviewed and revised. The Section 8 program Administrative Plan is revised and updated annually to reflect continuing programmatic changes from HUD. With more than 8,130 families in the Public Housing program and over 12,830 families in the Section 8 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 both the Section 8 and Public Housing programs.

***Grievance Procedures*** for the public housing and Section 8 programs are available as supporting documents to the PHA Plan. The Public Housing grievance procedure is part of the ACOP, and the Section 8 grievance procedure is contained in its Administrative Plan.

The ***Capital Improvement Needs*** section provides the annual and five-year modernization plans for maintaining and improving CMHA's public housing stock. Due to fiscal year timing differences, CMHA will be funding most of its capital improvement activities during 2004 with FY2003 and prior year Capital Fund Program (CFP) funds. CMHA adjusted the final CFP annual and five-year plans for FY2004 from an original amount of \$29 million based on FY2002 levels to \$26 million that is based on HUD's recent release of FY2003 funding amounts. The needs and priorities for these plans were developed through input from residents and management, and were based on prior capital needs studies and maintenance inspections.

Approximately \$30 million of un-obligated HOPE VI revitalization funds remain for Carver Park and the Riverview/Lakeview estates, and CMHA will be moving ahead with the Revitalization Plan activities for these two projects, which include demolition, new replacement housing on and off site, and homeownership opportunities. CMHA will submit a HOPE VI revitalization grant application for Valleyview in 2003, although the revitalization plan will be implemented even if it is not funded. If not funded, a FY2004 HOPE VI application for Valleyview would be considered, or for Garden Valley where CMHA will be conducting a master planning study. CMHA will also be seeking development opportunities for creating replacement housing, and leveraging CFP funds.

***Demolition and Disposition*** activities have occurred at several CMHA properties with only phase 2 of demolition at Carver Park (227 units) scheduled for demolition in 2004 under an existing HUD-approved plan. CMHA has submitted a demolition plan to HUD for all of Valleyview (243 units), which could start by the end of 2004. In addition, new demolition plans will be developed for buildings C40 and C41 (48 units) at Garden Valley, boiler plants at Outhwaite, Olde Cedar and Lakeview Terrace, and a Scattered Site house at 2042 West 44<sup>th</sup> Street.

CMHA is also considering development proposals that might require the disposition of vacant land at Woodland near East 51<sup>st</sup> and Superior near East 89<sup>th</sup> in addition to vacant land across from Crestview and behind Willson. To date, CMHA has demolished 383 units at Carver Park, 270 units at King Kennedy North, 135 units at Riverview, 102 units at Outhwaite and 6 units at Harvard-East 113<sup>th</sup> for a total of 896.

***Designation of Housing*** for the elderly at fourteen CMHA highrise properties was approved by HUD in 2001. CMHA revised this Plan beginning 2003 by replacing Springbrook (183 units) with LaRonde (55 units) and adding Union Court, a Carver Park off-site replacement project in Mt. Pleasant (39 units). For 2004, CMHA will increase the number of Union Court units to 48, which increases the total number of designated units to 2419. Through this designation, new admissions or transfers to these estates will be prioritized for the Elderly (age 62+) and Near-Elderly (age 50-61). From January 2001 through July 2003, the elderly and near-elderly population in these buildings has

increased from 84% to 92%, and the number of vacant units has been reduced by 319 for these 14 designated properties.

The *Conversion of Public Housing* requirement for mandatory conversions still does not apply to any CMHA estate. 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 *Homeownership*, CMHA has been operating the Turnkey III Homeownership program since 1971, and of the 385 original units, 40 homes remain unsold as of June 2003. To help address a housing need identified in our housing needs analysis, CMHA implemented a Section 8 homeownership program in 2003, and is developing a homeownership program for public housing scattered site units under the Final Rule guidelines issued in March 2003 that will be submitted to HUD for implementation during 2004.

*Community Service Programs* are an integral part of CMHA's efforts to empower its residents to attain and sustain self-sufficiency while living in healthy communities. 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 home day care for children to supportive housing for seniors and disabled. Working with diverse community resources, job training/placement, family and children services, educational enrichment, recreation, crime prevention, and substance abuse support are among the many services to residents. The primary goal is to support families making the transition from welfare to work and assist others to maintain healthy lifestyles. The full range of programming available to CMHA residents is listed in the services and programs table of this section.

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 Section 8 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 (refer to Attachment C). Although Congress modified this requirement in 2001 to only be applicable for residents at HOPE VI sites, it is now again applicable for residents at all public housing properties.

*Crime and Safety* is a key component of CMHA's housing strategy. CMHA is one of only 11 housing authorities in the country with its own police force. The CMHA Police Department was fully accredited in March 1998, and was re-accredited in 2001. The CMHA Police Department participates in law enforcement, prevention and intervention programming. Divisions of operation include Narcotics, Swat Unit, Forfeiture, Property Unit, K-9 unit, Community Policing, Youth Gang/Juvenile unit, Patrol divisions, Internal Affairs and Safety Management. The operating protocol has

been developed between the City of Cleveland Police Department and CMHA Police Department. The city provides baseline services to CMHA communities.

Beginning in 2004, CMHA will have to find an alternative way of funding about \$2.7 million of PHDEP-funded activities, since HUD has terminated this program. PHDEP funding during the 1990s resulted in a better living environment for CMHA residents through a variety of crime and safety programs that have resulted in a marked decrease in calls to police since the early 1990s. Drug activity continues to be a serious problem to the community, so CMHA will continue to focus on ongoing security measures to decrease drug activities, such as surveillance management (slow scan camera system), community police units, mini stations, the Police Activity League and resident Safety Committees and social services referrals. CMHA has also partnered with many community resources to provide prevention and intervention programs for residents.

CMHA amended its *Pet Ownership* policy in 2001 to include family properties in accordance with a QHWRA requirement and HUD's Final Rule, and in 2002, added a provision that allows dogs and cats within the established size limitations at single-family scattered site housing units. CMHA's Pet Policy is included in the ACOP, and is summarized in attachment K.

*Civil Rights Certification* is included with CMHA Plan Certifications.

The *Annual Audit* of CMHA for the period ended December 31, 2002 was completed in June 2003 and submitted to the local HUD Office. CMHA received an unqualified opinion on the 2002 financial statements with no audit findings for the third straight year after not receiving an unqualified opinion on both its balance and income statement since 1995. The Audit report is available for review as supporting documentation to this PHA Plan.

*Asset Management* is a key component to CMHA's planning efforts. In the 2004 PHA Plan, CMHA is providing Asset Management tables that summarize the various types of activities and strategies that are being undertaken to better manage each estate. These tables refer to actions being undertaken through the Capital Fund Program, Development, Demolition/disposition, Designated housing, Conversion, and Homeownership activities. In addition, CMHA has initiated a comprehensive annual Operating Fund budget process that is based upon these factors as well as an analysis of maintenance and management activities as measured by PHAS.

*Other Information* contained in the Agency Plan includes our confirmation to Resident Advisory Board participation; Certifications of Consistency with the Consolidated Plans of the Cuyahoga Urban County, City of Cleveland, and the City of East Cleveland; and a brief summary of the progress in meeting the goals and objectives of the 5-Year Plan.

The *Definition of Substantial Deviation and Significant Amendment* 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.

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

[24 CFR Part 903.7 9 (r)]

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

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## Attachments

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

### Required Attachments:

- A: Admissions Policy for Deconcentration
- B: FY2004 Capital Fund Program Annual Statements (oh003b01 & oh003c01)
- C: Implementation of Public Housing Resident Community Service Requirements
- F: Voluntary Conversion Initial Assessments
- K: Pet Policy
- L: Progress Statement of Goals and Objectives
- M: Resident Membership of the PHA Governing Board
- N: Membership of the Resident Advisory Board
- O: Section 8 Project-Based Vouchers
- P: Section 8 Homeownership Program
  
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

### Optional Attachments:

- D: PHA Management Organizational Chart
- E: FY2004 Capital Fund Program 5 Year Action Plan (oh003e01)
- G: Comments of Resident Advisory Board or Boards (oh003g01)
  
- Other (List below, providing each attachment name)
  - H: Asset Management tables (oh003h01)
  - I: Public Comments and Response (oh003i01)
  - J: Impediments to Fair Housing Strategy

## Supporting Documents Available for Review

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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
Attachment J	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources
X	Public Housing Admissions and Continued Occupancy Policy (ACOP), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
Attachment B	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
*N/A	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
Attachment E	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment	Annual Plan: Capital Needs
X	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
X	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
X	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program <input checked="" type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
X	Voluntary Conversion Initial Assessment documentation	Annual Plan: Conversion of Public Housing

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
*N/A	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
X	Other supporting documents (optional) (list individually; use as many lines as necessary)	(see below)
X	Replacement Housing Factor (RHF) Plan	
X	Public Housing Assessment System (PHAS) Resident Assessment indicator Follow-up Plan	
X	Improvement Plan for Vacancy rate and Unit Turnaround Time reduction	
X	Public Housing Affirmative Marketing Plan	
X	CMHA Replacement Housing Policy	

\* N/A – Not applicable to CMHA’s Agency Plan

# 1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

Cuyahoga County Housing Needs of Families in the Jurisdiction by Family Type								
Family Type	Overall	Afford-ability	Supply	Quality	Accessibility	Size	Location	
Income <= 30% of AMI	46,957							
Income >30% but <=50% of AMI	21,223	Housing needs of Cuyahoga County are categorized and quantified within Consolidated Planning Jurisdictions. See tables that follow.						
Income >50% but <80% of AMI	14,417							
Elderly	24,899							
Families with Disabilities	N/A							
White	45,199							
Black	36,979							
Hispanic	2,839							
Other races	1,439							

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

- Consolidated Plan of the Jurisdiction/s  
Indicate year:
- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset: 1990
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

Cleveland Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford- -ability	Supply	Quality	Access- -ibility	Size	Loca-tion
Income <= 30% of AMI	33,845	5	5	4	2	3	2
Income >30% but <=50% of AMI	9,377	4	4	3	2	3	2
Income >50% but <80% of AMI	3,865	3	3	2	2	3	2
Elderly	9,643	3	2	3	3	1	2
Families with Disabilities	N/A	N/A	4	4	4	2	4
White	17,878	3	3	3	2	3	2
Black	27,146	4	4	4	2	3	2
Hispanic	2,464	4	4	4	2	3	2
Other Races	647	4	4	4	2	3	2

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

- Consolidated Plan of the Jurisdiction/s  
Indicate year: 2000
- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS")  
dataset: 1990
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

<b>Cuyahoga Consortium Housing Needs of Families in the Jurisdiction by Family Type</b>							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	6,766	4	4	3	2	2	2
Income >30% but <=50% of AMI	7,361	3	3	3	2	3	2
Income >50% but <80% of AMI	12,833	2	2	3	2	4	2
Elderly	11,287	2	3	3	2	1	2
Families with Disabilities	N/A	2	4	3	4	1	3
White	72%	2	2	3	2	2	2
Black	26%	2	2	3	2	2	2
Other races	2%	2	2	3	2	2	2

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

- Consolidated Plan of the Jurisdiction/s  
Indicate year: 2000
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

East Cleveland Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	2,660	4	2	4	1	2	2
Income >30% but <=50% of AMI	1,107	4	2	4	1	2	2
Income >50% but <80% of AMI	425	3	2	4	1	2	2
Elderly	679	3	3	3	1	1	2
Families with Disabilities	N/A	2	4	3	3	1	2
White	226	3	2	4	N/A	2	2
Black	3,922	3	2	4	N/A	2	2
Hispanic	25	3	2	4	N/A	2	2
Race/Other	31	3	2	4	N/A	2	2

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

- Consolidated Plan of the Jurisdiction/s  
Indicate year: 1998
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset: 1990
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

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

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

<b>Housing Needs of Families on the Waiting List</b>			
Analysis based on July 2003 Wait List (run 7/31/03)			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> <b>Section 8 tenant-based assistance</b> <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	6,360		900
Extremely low income <=30% AMI	5,171	81%	
Very low income (>30% but <=50% AMI)	1,062	17%	
Low income (>50% but <80% AMI)	157	2%	
Families with children	4,262	67%	
Elderly families	267	4%	
Families with Disabilities	690	11%	
Black	5,660	89%	
White	445	7%	
Other	255	4%	
Characteristics by Bedroom Size (Public Housing Only)	Not Applicable for Section 8 Programs		
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
6+ BR			

<b>Housing Needs of Families on the Waiting List</b>	
Analysis based on July 2003 Wait List (run 7/31/03)	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	
If yes:	
How long has it been closed (# of months)? 24 (since 7/01)	
Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Supportive Service Referrals	

<b>Housing Needs of Families on the Waiting List</b>			
Analysis based on July 2003 Waiting List (run 7/23/03)			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> <b>Public Housing</b>			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/sub-jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	8,569		1,100
Extremely low income <=30% AMI	7,172	83.7%	
Very low income (>30% but <=50% AMI)	1,123	13.1%	
Low income (>50% but <80% AMI)	274	3.2%	
Families with children	3,351	39.1%	
Elderly families	193	2.3%	
Families with Disabilities	1,761	20.6%	
White	778	9.1%	
Black	7,230	84.4%	
Other	561	6.5%	

<b>Housing Needs of Families on the Waiting List</b>			
Analysis based on July 2003 Waiting List (run 7/23/03)			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	4,912	57.3%	507
2 BR	2,765	32.2%	340
3 BR	726	8.5%	227
4 BR	121	1.4%	21
5 BR	40	0.5%	4
6+ BR	5	0.1%	1
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

### C. Strategy for Addressing Needs

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

#### (1) Strategies

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

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

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources (if funding becomes available)
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required

- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

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

Select all that apply

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

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

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

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing (i.e., 40% of admissions to families at or below 30%)
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance (i.e., ensure adherence to requirement of targeting 75% of new admissions to families at or below 30%)
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

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

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)  
Under the *Banks v. Perk* Consent Order filed in 1983, CMHA submitted an affirmative marketing plan to encourage and promote integration of CMHA's new and old housing units.

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

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations

- Other:  
Partnerships with fair housing advocates to assist in affirmatively furthering fair housing.

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

**(2) Reasons for Selecting Strategies**

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

- Funding constraints  
 Staffing constraints  
 Limited availability of sites for assisted housing  
 Extent to which particular housing needs are met by other organizations in the community  
 Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA  
 Influence of the housing market on PHA programs  
 Community priorities regarding housing assistance  
 Results of consultation with local or state government  
 Results of consultation with residents and the Resident Advisory Board  
 Results of consultation with advocacy groups  
 Other: (list below)

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

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year.

Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

<b>Financial Resources: Planned Sources and Uses (Estimated)</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY2004 grants)</b>		
a) Public Housing Operating Fund	45,000,000	
b) Public Housing Capital Fund	26,000,000	
c) HOPE VI Revitalization	0	
d) HOPE VI Demolition	0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	91,000,000	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	0	
g) Resident Opportunity and Self-Sufficiency Grants	250,000	
h) Community Development Block Grant	0	
i) HOME	0	
Other Federal Grants (list below)		
Replacement Housing Fund	3,000,000	
Section 8 New Construction HAP	3,000,000	
Homeownership Turnkey III	250,000	
Total 2004 Grants (estimated)	168,500,000	
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
	As of 6/30/03	
Public Housing Capital Fund	18,049,097	Capital and Management Improvements (including Police and safety)
Replacement Housing Fund	0	Replacement housing
HOPE VI Revitalization	30,271,811	Capital improvements, supportive services, and neighborhood revitalization
HOPE VI Demolition	0	Demolition of public housing

<b>Financial Resources: Planned Sources and Uses (Estimated)</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
Public Housing Drug Elimination Program (PHDEP) grant	640,801	Supportive services, Police and Safety
ROSS Service Coordinators grants	399,390	Services for Elderly and Disabled
ROSS Neighborhood Networks grant	250,000	Supportive services
Tenant Opportunities Program grant	8,382	Supportive services
Youth Violence grant	856,895	Supportive services
Foster Care grant	45,381	Supportive services
Youth Apprenticeship/Urban Youth Corp. grants	355,673	Job training
Salvation Army/Y-Haven II grants	976,523	Transitional housing
Other misc. grants	46,329	Supportive services
Total Unobligated prior-year grants	51,900,282	
<b>3. Public Housing Dwelling Rental Income</b>		
Public Housing Dwelling Income	11,700,000	Public Housing operations
Homeownership Turnkey III rental income	79,000	Homeownership program operations
<b>4. Other income (list below)</b>		
Section 8 Administrative Fees	7,400,000	Section 8 program administration
Section 8 New Construction revenue	1,343,000	Housing operations
<b>5. Non-federal sources (list below)</b>		
Interest	500,000	Housing operations
Miscellaneous	458,000	Housing operations
<b>Total Resources</b>	<b>241,880,282</b>	

Please Note:

- (1) All Federal Grants for FY2004 are estimated based upon FY2003 levels.
- (2) Grant amounts indicate unobligated balances and will not all be spent in FY2004 since HUD allows multi-year periods for obligation and expenditure as follows:
  - a. Capital Fund Program – 2 years to obligate & 3 years to expend
  - b. Replacement Housing Fund – 4 years to obligate & 5 years to expend
  - c. Drug Elimination (PHDEP) – 1 year to obligate & 2 years to expend
  - d. HOPE VI Demolition – 1 year to obligate & 2 years to expend
  - e. HOPE VI Revitalization – multiple years as established in Revitalization Plan agreements with HUD

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

[24 CFR Part 903.7 9 (c)]

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

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

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

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

- When families are within a certain number of being offered a unit: (100-200 depending on the bedroom size)
- When families are within a certain time of being offered a unit: (state time)
- Other: (describe)

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

- Criminal or Drug-related activity
- Rental history
- Housekeeping
- Other: Sex-offender registration

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

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

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

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

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

- Community-wide list
- Sub-jurisdictional lists (Oakwood Village)
- Site-based waiting lists (3 HOPE VI sites, including both the off and on site development at Carver Park and Riverview)
- Other (describe)

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

- CMHA Administrative Office Annex on 2711 Church Street
- CMHA development site management offices (for 3 HOPE VI sites)
- Other (list below)

Carl B. Stokes Social Services Mall at 6001 Woodland Avenue

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

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

Three (3) HOPE VI sites: Lakeview Terrace, and both the on and off site development at Carver Park and Riverview.

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

If yes, how many lists? 0

3.  Yes  No: May families be on more than one list simultaneously

If yes, how many lists? As many as desired (no set limit)

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

- CMHA Administrative Office Annex on 2711 Church Street
- All PHA development management offices
- Management offices at developments with site-based waiting lists
- At the development to which they would like to apply
- Other (list below)

### **(3) Assignment**

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

- One to bottom of list
- Two
- Three

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

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

Site-based Waiting Lists will offer one-choice before removing from list.

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

a. Income targeting:

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

b. Transfer policies:

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

- Emergencies
- Overhoused
- Underhoused
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)
- Resident choice: (state circumstances below)
- Other: (list below)

c. Preferences

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

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness, with referral letter from recognized homeless shelter
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

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

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either

through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

Date and Time: Tie breaker

Former Federal preferences:

- 1 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- 1 Homelessness, with referral letter from recognized homeless shelter
- High rent burden

Other preferences (select all that apply)

- 1 Working families and those unable to work because of age or disability
- 1 Veterans and veterans’ families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- 1 Other preference(s):  
Successful completion of a substance abuse treatment program

4. Relationship of preferences to income targeting requirements:

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

### **(5) Occupancy**

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

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

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

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

**(6) Deconcentration and Income Mixing**

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

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

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

Adoption of site based waiting lists  
If selected, list targeted developments below:

Employing waiting list “skipping” to achieve deconcentration of poverty or income mixing goals at targeted developments  
If selected, list targeted developments below:

Employing new admission preferences at targeted developments  
If selected, list targeted developments below:

Other (list policies and developments targeted below)

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

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

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

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

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

Deconcentration Policy for Covered Developments		
Number		

Development Name	of Units	Explanation	Deconcentration Policy
Woodhill Homes	469	Under 85% of average income	1) Assist current residents in achieving economic self-sufficiency and higher incomes
Cedar Extension	246	Under 85% of average income	1) Assist current residents in achieving economic self-sufficiency and higher incomes
Garden Valley	573	Under 85% of average income	1) Assist current residents in achieving economic self-sufficiency and higher incomes

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

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

Deconcentration Policy for Covered Developments			
Development Name	Number of Units	Explanation	Deconcentration Policy
Riverside Park	410	Over 115% of average income	None – the average income is and will remain below 30% of AMI
Carver Park	462	Over 115% of average income	None – the average income is and will remain below 30% of AMI

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### (1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

- Criminal or drug-related activity only to the extent required by law or regulation  
 Criminal and drug-related activity, more extensively than required by law or regulation  
 More general screening than criminal and drug-related activity (list factors below)  
 Other (list below)

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

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

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

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

Criminal or drug-related activity

Other (describe below)

If requested, the current and prior addresses of the participant and the names and addresses of the current and previous owners, if known.

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

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

None

Federal public housing

Federal moderate rehabilitation

Federal project-based certificate program

Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

PHA main administrative office

Other (list below)

Only when the waiting list is open may an interested person apply.

Selection for the waiting list is made through a lottery process. A public notice advises of the opening of the waiting list.

### **(3) Search Time**

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

If yes, state circumstances below:

Due to the tight housing rental market and the demand for 3 and 4 bedroom units, applicants are given the entire 120 days to search for a unit.

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

a. Income targeting

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

b. Preferences

1.  Yes  No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application)

(if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

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

Former Federal preferences

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

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)
  - (1) Families participating in the Moderate Rehabilitation program who must relocate because the family is underhoused or has a disabled member and there are no Moderate Rehabilitation units in the appropriate size or type.
  - (2) Referrals from the Gateway program for special needs families.
  - (3) Public Housing residents displaced by demolition or disposition actions.

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

Date and Time

Former Federal preferences

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

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below):
  - (1) Moderate Rehabilitation families (referred to above)
  - (2) Referrals from Gateway program for special needs families
  - (3) Public Housing residents displaced by demolition or disposition actions.

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

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

5. If the PHA plans to employ preferences for "residents who live and/or work in the jurisdiction" (select one)

- This preference has previously been reviewed and approved by HUD
- The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

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

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

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other (list below)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices
- Other (list below)
  - Through relationships with social service agencies serving the special purpose populations

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

[24 CFR Part 903.7 9 (d)]

### **A. Public Housing**

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

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

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

a. Use of discretionary policies: (select one)

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

---or---

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

b. Minimum Rent

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

- \$0  
 \$1-\$25  
 \$26-\$50

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

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

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

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

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

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

- For the earned income of a previously unemployed household member
- For increases in earned income
- Fixed amount (other than general rent-setting policy)  
If yes, state amount/s and circumstances below:
- Fixed percentage (other than general rent-setting policy)  
If yes, state percentage/s and circumstances below:
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

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

- Yes for all developments
- Yes but only for some developments
- No

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

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

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

- Market comparability study
- Fair market rents (FMR)
- 95<sup>th</sup> percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The "rental value" of the unit
- Other (list below)

f. Rent re-determinations:

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

- Never
- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount (\$2500)
- Other (list below)  
Any time there is a change in family composition

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

## **(2) Flat Rents**

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

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below)

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

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

### **(1) Payment Standards**

Describe the voucher payment standards and policies.

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

- At or above 90% but below 100% of FMR
- 100% of FMR (amended 5/5/04)**
- Above 100% but at or below 110% of FMR
- Above 110% of FMR (if HUD approved; describe circumstances below)

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

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

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

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

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

- Annually
- Other (list below)

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

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below)  
Deconcentration opportunities

## **(2) Minimum Rent**

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

- \$0
- \$1-\$25
- \$26-\$50

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

## **5. Operations and Management**

[24 CFR Part 903.7 9 (e)]

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

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

Describe the PHA's management structure and organization.

(select one)

An organization chart showing the PHA's management structure and organization is included as Attachment D

A brief description of the management structure and organization of the PHA follows:

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

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

<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing	8,136 families	1,160
Section 8 Vouchers	12,836 units	840
Section 8 Mod Rehab	582 units	20
Special Purpose Section 8 Vouchers (list individually)	752 – Welfare to Work 478 – Disabled Funding 200 – Family Unification 29 – VASH	60 20 20 3
Public Housing Drug Elimination Program (PHDEP)	No longer funded.	N/A
Other Federal Programs:		
Family Self Sufficiency	200 families	30
Economic Development and Self Sufficiency (EDSS)	N/A	N/A
ROSS Elderly Services	3000 contacts	N/A
ROSS Neighborhood Network	1000 residents	N/A
Youth Violence Prevention	2500 residents	N/A
Transitional Families	135 families	50
Turnkey III	40 units	5
Section 8 New Construction	566 families	60

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

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

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

Admissions and Continued Occupancy Plan

Rent Collection Procedures

Maintenance Plan

(2) Section 8 Management: (list below)

Section 8 Administrative Plan

## **6. PHA Grievance Procedures**

[24 CFR Part 903.7 9 (f)]

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

### **A. Public Housing**

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

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

CMHA Main Administrative Office: 1441 West 25<sup>th</sup> Street

PHA development management offices

Other: (list below)

CMHA Administrative Office Annex: 2711 Church Street

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

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

If yes, list additions to federal requirements below:

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

PHA main administrative office

Other (list below)

Section 8:

CMHA Section 8 Dept

2711 Church Street

Cleveland OH 44113

## **7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

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

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

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

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

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

Select one:

The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment B

-or-

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

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

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

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

b. If yes to question a, select one:

The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment E

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

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

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

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

b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name: **King-Kennedy/Outhwaite**
2. Development (project) number: OH3-018 & OH3-003
3. Status of grant: (select the statement that best describes the current status)
  - Revitalization Plan under development
  - Revitalization Plan submitted, pending approval
  - Revitalization Plan approved
  - Activities pursuant to an approved Revitalization Plan underway (substantially completed)

1. Development name: **Carver Park**
2. Development (project) number: OH3-007
3. Status of grant: (select the statement that best describes the current status)
  - Revitalization Plan under development
  - Revitalization Plan submitted, pending approval
  - Revitalization Plan approved
  - Activities pursuant to an approved Revitalization Plan underway

1. Development name: **Riverview/Lakeview**
2. Development (project): OH3-025 (078) & OH3-016
3. Status of grant: (select the statement that best describes the current status)
  - Revitalization Plan under development
  - Revitalization Plan submitted, pending approval
  - Revitalization Plan approved
  - Activities pursuant to an approved Revitalization Plan underway

1. Development name: **Valleyview (if 2003 application approved)**
2. Development (project): OH3-001
3. Status of grant: (select the statement that best describes the current status)
  - Revitalization Plan under development
  - Revitalization Plan submitted, pending approval
  - Revitalization Plan approved
  - Activities pursuant to an approved Revitalization Plan underway

Yes  No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?

If yes, list development name/s below:

Valleyview (OH3-001), if not funded in 2003  
Garden Valley (OH3-013)

Yes  No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?

If yes, list developments or activities below:

Riverview (Hope VI) – finalize developer agreement, develop rental term sheet for phase one of the development project and submit funding application for tax-exempt bonds and/or low income housing tax credits.

Carver Park (Hope VI) – complete construction of West Side Homes and East Side Neighborhood Homes projects, and submit funding application for final phase of the off-site replacement housing plan.

Valleyview – initiate on-site development plan by relocating residents, demolishing all buildings and constructing mixed-finance, mixed-income development, whether funded under Hope VI or accelerated mod; and proceed with off-site replacement housing options by soliciting for development partners who would include public housing in their development projects, including development opportunities outside the City of Cleveland.  
Garden Valley – develop mixed-finance, mixed-use plan for Garden Valley and the surrounding area.

Replacement housing opportunities - seek new public housing development activities using any HUD approved development method.

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

If yes, list developments or activities below:

King Kennedy North – with completion of design, the developer will implement on-site development activities by constructing 98 new units in two phases.

## 8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

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

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

### 2. Activity Description

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

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Carver Park 1b. Development (project) number: OH3-007
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(10/7/97 &amp; 4/6/01)</u>
5. Number of units affected: 227 in phase 2 (total of 610 with 383 previously demolished)
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Valleyview 1b. Development (project) number: OH3-001
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(8/15/03)</u>

5. Number of units affected: 243
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Outhwaite
1b. Development (project) number: OH3-003 & 015
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (6/30/04)
5. Number of units affected: 0 units - Boiler Plant only
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Olde Cedar
1b. Development (project) number: OH3-014
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (3/31/04)
5. Number of units affected: 0 units - Boiler Plant only
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
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1a. Development name: Lakeview Terrace 1b. Development (project) number: OH3-016
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (3/31/04)
5. Number of units affected: 0 units - Boiler Plant only
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Garden Valley 1b. Development (project) number: OH3-013
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (3/31/04)
5. Number of units affected: 48 units (2 vacant buildings: C40 & C41) near East 73rd St.
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Scattered Homes 1b. Development (project) number: OH3-106
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (3/31/04)

5. Number of units affected: 1 unit at 2042 West 44 <sup>th</sup> Street
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Crestview
1b. Development (project) number: OH3-017
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (1/31/04)
5. Number of units affected: None (vacant land on other side of Crestline Ave.)
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 6/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Willson Apartments
1b. Development (project) number: OH3-024
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (1/31/04)
5. Number of units affected: None (vacant land near Perkins Court)
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
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1a. Development name: Outhwaite 1b. Development (project) number: OH3-003 & 015
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(9/30/04)</u>
5. Number of units affected: None (vacant land on Woodland Ave. near E.51st St.)
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Superior Terrace 1b. Development (project) number: OH3-076
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(9/30/04)</u>
5. Number of units affected: None (vacant land on Superior Ave.)
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2004 b. Projected end date of activity: 12/2004

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

[24 CFR Part 903.7 9 (i)]

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

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

2. Activity Description

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

<b>Designation of Public Housing Activity Description</b>	
1a. Development name: See below	
1b. Development (project) number: See below	
2. Designation type:	
Occupancy by only elderly families <input checked="" type="checkbox"/>	
Occupancy by families with disabilities <input type="checkbox"/>	
Occupancy by only elderly families and families with disabilities <input type="checkbox"/>	
3. Application status (select one)	
Approved; included in the PHA’s Designation Plan <input checked="" type="checkbox"/>	
Submitted, pending approval <input type="checkbox"/>	
Planned application <input type="checkbox"/>	
4. Date this designation approved, submitted, or planned for submission: (1/18/2001)	
5. If approved, will this designation constitute a (select one)	
<input type="checkbox"/> New Designation Plan	
<input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan	
6. Number of units affected: 2,419	
7. Coverage of action (select one)	

<input type="checkbox"/>	Part of the development
<input checked="" type="checkbox"/>	Total development (except King Kennedy North (highrise buildings only))

	1a. Development Name	1b. Number	6. Number of Units	7. Part/Total
1	Addison Square	OH3-034	219	Total
2	Apthorp	OH3-037	161	Total
3	Beachcrest	OH3-035	235	Total
4	Bohn Tower	OH3-042	261	Total
5	Cedar Extension	OH3-011	156	Total
6	Euclid Beach	OH3-052	147	Total
7	Fairway Manor	OH3-077	53	Total
8	King Kennedy North	OH3-026	172	Part
9	LaRonde	OH3-030	55	Total
10	Lorain Square	OH3-040	109	Total
11	Mt. Auburn	OH3-039	102	Total
12	Oakwood Villas	OH3-054	91	Total
13	Riverview Towers	OH3-025	452	Total
14	Scranton Castle	OH3-036	158	Total
	Union Court Apts.*	New	48	Total

\* HUD provided conditional approval of the 39 new units being developed as Union Court Apartments in Mt. Pleasant as part of the Carver Park off-site replacement project subject to its completion. CMHA will request a revision in the number of units to 48.

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

[24 CFR Part 903.7 9 (j)]

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

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

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

#### 2. Activity Description

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

<b>Conversion of Public Housing Activity Description</b>
1a. Development name: 1b. Development (project) number:
2. What is the status of the required assessment? <input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)
4. Status of Conversion Plan (select the statement that best describes the current status) <input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one) <input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved: <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: )

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

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

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

# 11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

## A. Public Housing

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

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

### 2. Activity Description

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

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
1a. Development name: Turnkey III Homeownership Program 1b. Development (project) number: OH# 305, 343, 347, 348, 349, 351, 360, 361, 362, 363, 364, 365, 366, 367, 368, and 369
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input checked="" type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input checked="" type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (01/04/71)
5. Number of units affected: Total 349/ Remaining 40
6. Coverage of action: (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>	
1a. Development name:	Scattered Site Homeownership Program
1b. Development (project) number:	OH3-073 and 106
2. Federal Program authority:	<input type="checkbox"/> HOPE I <input checked="" type="checkbox"/> <del>5(h)</del> 24 CFR Part 906 (Final Rule published 3/11/03) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one)	<input type="checkbox"/> Approved; included in the PHA's Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission:	(3/2004)
5. Number of units affected:	178 (all single family houses will be eligible)
6. Coverage of action: (select one)	<input checked="" type="checkbox"/> Part of the development: Scattered Rehab. (OH3-073 – 124 of 153) <input checked="" type="checkbox"/> Total development: Scattered Homes (OH3-106 – all 54)

## B. Section 8 Tenant Based Assistance

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

### 2. Program Description:

#### a. Size of Program

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

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

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

b. PHA-established eligibility criteria

Yes  No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?

If yes, list criteria below:

Eligible applicants must have completed an initial Section 8 lease term, may not owe any program-related outstanding debts, and must meet the eligibility criteria, including:

- (1) Be a first time homeowner, or have a member who is a person with disabilities;
- (2) Meet all minimum income requirements without welfare assistance sources;
- (3) With the exception of elderly and disabled households, meet employment criteria.

Additional eligibility criteria are elaborated in the Section 8 Administrative Plan.

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

[24 CFR Part 903.7 9 (1)]

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

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

1. Cooperative agreements:

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

If yes, what was the date that agreement was signed?

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

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

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

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

a. Self-Sufficiency Policies

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

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

b. Economic and Social self-sufficiency programs

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

<b>Services and Programs</b>				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
<b><i>Employment</i></b>				
Job Readiness Training/Placement (Workforce Development)	150	Self select	Resident Services Economic Development unit	Public Housing residents
GED Classes/Computer Training	350	Self select	Cleveland Municipal Schools, Urban League, Bellaire Puritas Dev. Corp.	Public Housing residents
Small Business Development Program	10-20	Adults & Youths	Resident Empowerment Organization (REO)	Public Housing residents
Entrepreneurial Program	55	Youth & Adults	Resident Empowerment Organization (REO)	Public Housing residents
Resident Choice Training Skills Development Program	77	Random selection through lottery system	Resident Services Economic Development unit	Public Housing residents
Life Skills	20-50	Self select	Goodwill Industries, Cleveland Municipal Schools	Public Housing residents
Homeownership	15-50	Self select	Peace in the Hood	Public Housing residents
<b><i>Drug Elimination Programs</i></b>				
After-school programs	200-300	youth	Advance Concepts, Bellaire Puritas, Friendly Inn Settlement House, Garden Valley Neighborhood House, St. Malachi, Cleveland Public Theatre	Public Housing residents
Home-based school readiness program	100	Parent/Guardians with 3-5 year old children	Home Instructional Program for Preschool Youngsters (HIPYP)	Public Housing residents
Health and Wellness	300-400	Adults & youth	Fit for Life, Stretching the Limits	Public Housing residents
Substance abuse treatment program for women with children	135	Adult women with children Self select	Miracle Village/East Side Catholic Center and Shelter	Public Housing residents and community

Substance Abuse Treatment program	10-50	Self select, Referral	ORCA House, Freedom House	Public Housing residents
Structured recreational activities (Police Athletic League)	600	Self select	CMHA Resident Services Dept.	Public Housing residents
<b>CMHA Collaboration</b>				
Escort services (Care Team)	800	Seniors	Community Re-entry	Public Housing residents
Podiatry services	500	Seniors Self select	Dr. Dwight Scott	Public Housing residents
Education and holiday dinners	6000	Ages 3-13	Lighthouse Inc	Public Housing residents
Neighborhood Foster Care	100	Central Area residents Self select	CMHA Resident Services Dept., Cuy. Co. Children and Family Services Dept.	Public Housing residents
Primary Health Care Clinics	100	Self select	Care Alliance	Public Housing residents
AIDS Prevention and Education	3000	Self select	Project Safe/CMHA	Public Housing residents and community
Transportation	7000	Self select	CMHA Transportation/Maintenance Dept.	Public Housing residents
Healthy CMHA	All residents	Self select	Cleveland Health Museum and Case Western Reserve Univ.	Public Housing residents
Family health and counseling	175	Self select	Beech Brook	Public Housing residents and community
Hunger Center	475	Self select	St. Peter Claver	Public Housing residents and community
Senior services	175	Seniors	Retired Senior Volunteer Program (RSVP)	Public Housing residents and community
Community Policing	All residents	Self select	Community Police/Narcotics Unit	Public Housing residents
<b>Resident Services Internal Programs</b>				
Youth services	1000	Ages 1-18	CMHA Community Centers	Public Housing residents
Do to the Right Thing	16	High school or college youth 14-18 years of age with a 2.0 GPA	various CMHA departments	Public Housing residents
Toddler Rock	80	Children ages 2-5	Rock & Roll Hall of Fame	Public Housing residents
Social supportive services (Community Resource Advocacy)	1500	Self select and referral	Resident Services Dept.	Public Housing residents
<b>Transitional Housing Programs</b>				
Transitional housing for homeless males	70	Homeless recovering males	Salvation Army (Willson Tower)	Open to community
Transitional housing for male adults recovering from chemical dependencies	41	Recovering homeless males 18+	Y-Haven	Open to community

Transitional housing for male adults recovering from chemical dependencies	25	Recovering homeless males 18+	Carl B. Stokes Social Services Mall	Open to community
Bridging the Gap (assists homeless in obtaining public housing)	200	18 yrs. and over	Northeast Ohio Coalition for the Homeless (NEOCH)	Open to Community

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

a. Participation Description

<b>Family Self Sufficiency (FSS) Participation</b>		
Program	Required Number of Participants (start of FY 2004 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing		
Section 8	153	200 (7/25/03)

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

**C. Welfare Benefit Reductions**

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination.
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies
- Other: (list below)

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

Refer to Attachment C: Implementation of Public Housing Resident Community Service Requirement.

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

0[24 CFR Part 903.7 9 (m)]

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

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

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

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

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

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

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

Carver Park  
Garden Valley  
Lakeview Terrace  
Olde Cedar/Cedar Extension  
Outhwaite  
Riverside Park  
Valleyview  
Woodhill

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

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

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other: CMHA Police Department

2. Which developments are most affected?

- Carver Park
- Garden Valley
- Lakeview Terrace
- Olde Cedar/Cedar Extension
- Outhwaite
- Riverside Park
- Valleyview
- Woodhill

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

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

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

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

- Carver Park
- Garden Valley
- Lakeview Terrace
- Olde Cedar/Cedar Extension
- Outhwaite

Riverside Park  
Valleyview  
Woodhill

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

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

- Yes  No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- Yes  No: Has the PHA included the PHDEP Plan for FY 2004 in this PHA Plan?
- Yes  No: This PHDEP Plan is an Attachment

Note: HUD discontinued funding for the PHDEP program starting in 2002.

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

[24 CFR Part 903.7 9 (n)]

As a result of QHWRA, tenants of family units are allowed to have pets that meet CMHA policy. In 2001, CMHA adopted the existing Pet Policy for highrise/elderly estates, and applied it to both highrise/elderly estates and family estates. CMHA believes this policy is in accordance with HUD's Final Rule on Pet Ownership in Public Housing, and has made it a part of the Admissions and Continued Occupancy Policy (ACOP). For 2002, CMHA amended the Pet Policy to allow dogs and cats within specified size limitations at single-family scattered site houses.

The Pet Policy is summarized in Attachment K.

## **15. Civil Rights Certifications**

[24 CFR Part 903.7 9 (o)]

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

## **16. Fiscal Audit**

[24 CFR Part 903.7 9 (p)]

1.  Yes  No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?  
(If no, skip to component 17.)
2.  Yes  No: Was the most recent fiscal audit (FY2002) submitted to HUD?
3.  Yes  No: Were there any findings as the result of that audit?
4.  Yes  No: If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain?
5.  Yes  No: Have responses to any unresolved findings been submitted to HUD?

If not, when are they due (state below)?

## **17. PHA Asset Management**

[24 CFR Part 903.7 9 (q)]

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

1.  Yes  No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?

2. What types of asset management activities will the PHA undertake? (select all that apply)

- Not applicable
- Private management
- Development-based accounting
- Comprehensive stock assessment
- Other: (list below)

A consolidated planning process to develop the FY2003 Operating Budget and individual estate work plans, with resource allocation based upon the asset management activities indicated in the Asset Management Table, as well as:

- (1) REAC Physical Inspection results
- (2) PHAS Management Operations performance
- (3) Improvement Plan (Vacancy Rate and Unit Turnaround Time)
- (4) Maintenance Plan

3.  Yes  No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

Refer to Attachment H: Public Housing Asset Management Table

## **18. Other Information**

[24 CFR Part 903.7 9 (r)]

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

1.  Yes  No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
  
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)  
 Attached at Attachment G  
 Provided below:
  
3. In what manner did the PHA address those comments? (select all that apply)  
 Considered comments, but determined that no changes to the PHA Plan were necessary.  
 The PHA changed portions of the PHA Plan in response to comments  
List changes below:  
 Other: (list below)

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

1.  Yes  No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)
  
2.  Yes  No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

*Note: The Ohio Revised Code (chapter 3735.27) requires that "after March 15, 1983, at least one of the (board) members appointed by the chief executive officer of the most populous city shall be a resident of a dwelling unit owned or managed by the housing authority... If there is an elected, representative body of all residents of the housing authority, then the chief executive officer shall, whenever there is a vacancy in this resident term, provide written notice of the vacancy to the representative body. If the representative body submits to the chief executive officer, in writing and within sixty days after the date on which it was notified of the vacancy, the names of at least five residents of the housing authority who are willing and qualified to serve as a member, then the chief executive officer shall appoint to the resident term one of the residents recommended by the representative body."*

3. Description of Resident Election Process

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

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

b. Eligible candidates: (select one)

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

c. Eligible voters: (select all that apply)

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

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

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

1. Consolidated Plan jurisdiction: City of Cleveland, Cuyahoga Urban County, and East Cleveland

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

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)

Support Rental Housing Need:

- Continue voucher assistance for special needs population
- Apply for and issue additional Section 8 vouchers
- Support tax credit rental housing development
- Landlord outreach and tenant opportunity counseling
- HOPE VI Housing Revitalization

Modernization of public housing estates

Support Homeless Needs:

Units provided for Transitional Housing programs  
Vouchers provided for graduates of transitional housing

Support Resident Initiatives:

Reduce risk factors associated with drug use  
Youth violence intervention  
Health services  
Job training and other economic self sufficiency programs  
Support of resident involvement activities through PAC  
Training of residents to fill maintenance and management jobs

Support Homeownership Opportunities:

Second mortgage assistance for Homeownership Zone through  
HOPE VI program  
Implementation of a Section 8 Homeownership program

Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)  
See 2 above.

**D. Other Information Required by HUD**

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

**19. Definition of “Substantial Deviation” and Significant Amendment or Modification”**

[24 CFR Part 903.7 (r)]

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” with an exception allowed for actions due to changes in HUD regulatory requirements.

- 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 with regard to demolition or disposition, designation, homeownership programs or conversion activities.

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.

## **Attachments**

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

### Certifications:

- (1) PHA Certifications of Compliance with the PHA Plans and Related Regulations
- (2) Board Resolution #180-03, Authorizing and Adopting the PHA Plan for FY2004
- (3) Certifications by State and Local Official of PHA Plans Consistency with the Consolidated Plan (HUD50075) – City of Cleveland
- (4) Certification for a Drug-Free Workplace (HUD50070)
- (5) Certification of Payments to Influence Federal Transactions (HUD50071)
- (6) Disclosure of Lobbying Activities (SF-LLL)

### Attachments:

- A: Admissions Policy for Deconcentration
- B: FY2004 Capital Fund Program (CFP) Annual Statements (oh003b01)
  - Annual Statements for Open CFP and Replacement Housing grants (oh003c01)
- C: Implementation of Public Housing Resident Community Service Requirements
- D: PHA Management Organizational Chart
- E: FY2004 Capital Fund Program 5 Year Action Plan (oh003e01)
- F: Voluntary Conversion Initial Assessments
- G: Comments of Resident Advisory Board or Boards (oh003g01)
- H: Public Housing Asset Management Table (oh003h01)
- I: Public Comments and Response (oh003i01)
- J: Impediments to Fair Housing Strategy
- K: Pet Policy
- L: Progress Statement of Goals and Objectives
- M: Resident Membership of the PHA Governing Board
- N: Membership of the Resident Advisory Board
- O: Section 8 Project-Based Vouchers
- P. Section 8 Homeownership Capacity Statement

## **Attachment A**

### **Admissions Policy for Deconcentration**

It is the intention of the CMHA to promote Deconcentration of Poverty and Fair Housing in Programs Admissions at all public housing estates subject to deconcentration and income-mixing requirements as published by HUD (24 CFR Part 903; Rule to Deconcentrate 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 as identified in 3.A.(6) of the Annual Plan, 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 and/or amenities to attract higher income families to estates where the average income is below the Established Income Range.
- (2) Target investment and capital improvements to estates where the average income is below the Established Income Range in order to attract higher income families.
- (3) Establish a preference for admission of working families to estates where the average income is below the Established Income Range.
- (4) Skip a family on the waiting list in order to reach another family in an effort to further the agency goals of deconcentration and income mixing.
- (5) 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.

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 PHA Annual Plan, as required by HUD.

## **Attachment B**

### **FY 2004 Capital Fund Program (CFP) Annual Statement**

See attached schedules.

FY2004 Annual Statements (file oh003b01)

Open CFP and Replacement Housing Fund grants (oh003c01)

## Attachment C

### Implementation of Public Housing Community Service Requirements

In 2001, the Cuyahoga Metropolitan Housing Authority (CMHA) implemented the HUD-mandated Community Service requirement for non-working adult residents who are not in compliance with Ohio Works First/Welfare Reform requirements and do not meet criteria for an exemption. The plan requires residents to perform volunteer work at a minimum of 8 hours a month and report their compliance as part of their annual reexamination. CMHA incorporated the community service requirement into the Public Housing Dwelling Lease, which became effective April 1, 2001, and the Admissions and Continued Occupancy Policy (ACOP) for 2001.

Initially, all public housing residents were advised of how to comply with the community service requirement through a written notice in December 2000. Due to changes in HUD regulations, residents were re-notified in January 2002 that the community service requirement would only apply to residents of HOPE VI estates. Then in July 2003, another letter was sent to all households to notify them that the community service requirement was again applicable to all public housing residents.

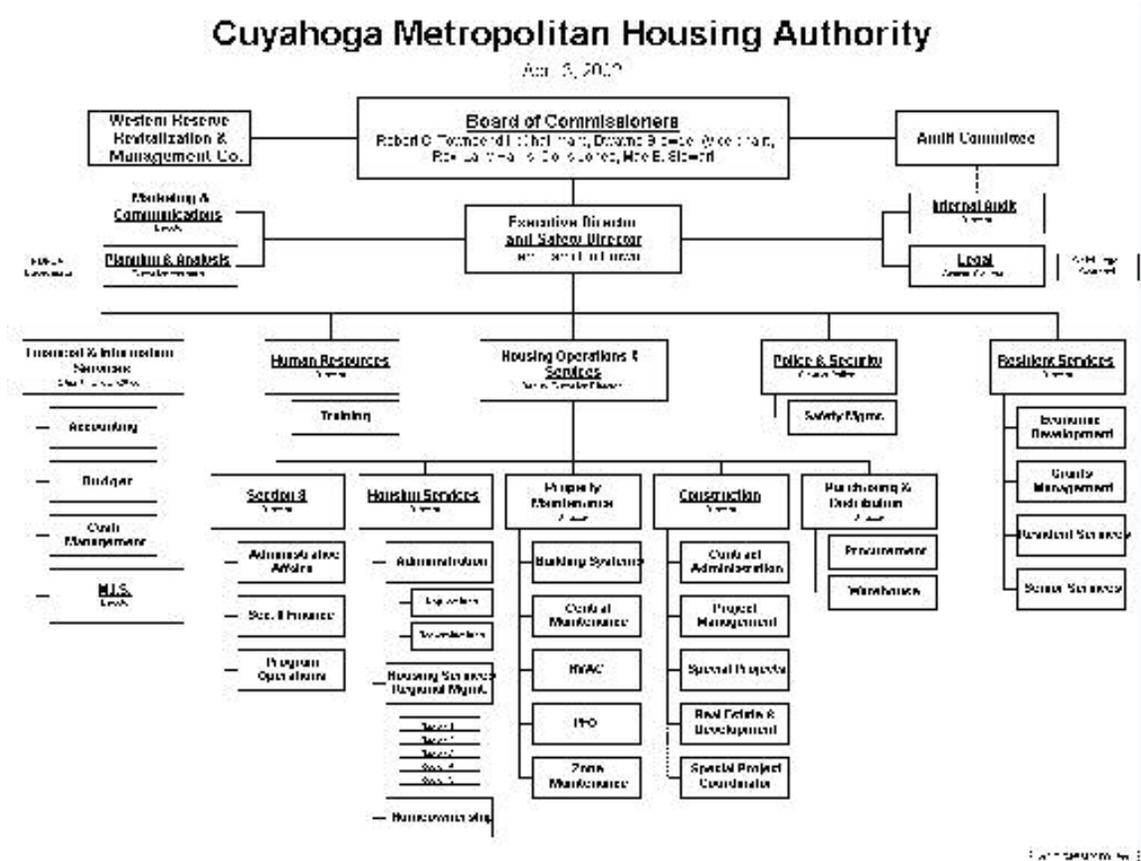
Eligible residents are required to identify their community service work assignments and provide documentation to the Housing Services Department indicating their compliance with the regulation. Individual residents having difficulty identifying work assignments will be referred to CMHA's Resident Services Department for assistance. Work assignments will be identified within the housing authority and local community as necessary.

Residents assigned to work in outside agencies by Resident Services are covered under CMHA's existing insurance policies in the event of injury. The liability from CMHA would be transferred to the outside agency through the signing of a release. Separate coverage, however, would have to be secured by CMHA for the Community Service Program.

A Memorandum of Agreement (MOA) with the County welfare agency to help identify residents who no longer have income and are non-working will be critical to properly implement the community service requirement. A MOA is being secured from the Cuyahoga Department of Health and Human Resources, which oversees the Cuyahoga Work and Training Agency, Adult and Senior Protective Services, Children and Family Services, and Health and Nutrition.

# Attachment D

## PHA Management Organizational Chart



## **Attachment E**

### **Capital Fund Program 5-Year Action Plan**

See attached schedules.

(file oh003e01)

## Attachment F

### Voluntary Conversion Initial Assessments

- a. How many of the PHA's developments are subject to the Required Initial Assessments?  
*30 developments*
- b. How many of the PHA's developments are not subject to the Required Initial Assessments based on exemptions (e.g. elderly and/or disabled developments not general occupancy projects)?  
*21 developments*
- c. How many Assessments were conducted for the PHA's covered developments?  
*An assessment was conducted for each of the 30 developments that were subject to the Required Initial Assessments.*
- d. Identify PHA developments that may be appropriate for conversion based on the Required Initial Assessments?  
*None of CMHA's developments are appropriate for conversion.*
- e. If the PHA has not completed the Required Initial Assessments, describe the status of these assessments:

## **Attachment G**

### **Comments of Resident Advisory Board**

See attached document.

(file oh003g01)

## **Attachment H**

### **Public Housing Asset Management Table**

See attached table.

(file oh003h01)

**Attachment I**  
**Public Comments and Response**

See attached documents.

(file oh003i01)

**Attachment J**  
**Strategy for Addressing Impediments to Fair Housing Choice**

<b>ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE</b>	
<b>Major Impediments Identified in Consolidated Plan</b>	<b>CMHA Action Plan</b>
Lack of a coordinated approach to fair housing throughout the Cuyahoga County region.	Development of Agency Plan included review of the housing needs assessment of the Consolidated Plan(s) and collaboration with City and County housing administrators.
Inadequate enforcement measures by the U.S. Department of Housing and Urban Development to ensure recipients of CDBG funds are taking actions to affirmatively further fair housing.	Outside the control or influence of CMHA
NIMBY-ism attitudes among community residents.	Deconcentration in public housing. Landlord outreach and housing opportunity counseling in Section 8 program.
Inadequate supply of public housing.	Expanded Section 8 program size, replacement housing, tax credit development, homeownership development and site based section 8 assessment.
Existence of a dual housing market –or one market for blacks and a separate market for whites.	Analysis of minority needs and measures to serve. Race/ethnicity tracking of the families served and location housed. Coordination with Cuyahoga Plan to follow-up on all reported cases of discrimination. Adequate payment standards to provide access to neighborhoods of low poverty and minority concentration.
Lending industry refused to support the lending demands of low-income and minority neighborhoods.	Homeownership Program with Community Reinvestment Act participation
Inadequate public transportation system contributes to segregation by limiting suburban job opportunities for urban residents.	Payment standards aligned to cost of rental housing throughout jurisdiction. Identification of areas of opportunity with adequate transportation as part of family briefing. Study to determine feasibility of deducting travel costs related to employment from the calculation of income.
Discrimination against, and scarce and limited housing opportunities for persons with disabilities.	Preference for families referred by supportive service agencies for 700+ families and public housing stock supply study.
Discrimination against persons under the protected classes in provision of property insurance	Inclusion of property insurance participation in affordable homeownership program.

## **Attachment K**

### **Pet Policy**

#### **Summary of CMHA Pet Policy**

CMHA defines “pet” to mean dogs, cats, parakeets, canaries, finches, hamsters, guinea pigs, fish and turtles. Any animals not included in the definition are excluded. Cats and dogs are distinguished from other pets as “fur-bearing” animals. There is a specified size restriction for cats and dogs, and they must be licensed and registered. Animals specifically trained to assist, support, or provide service to persons with disabilities, are not considered pets for the purposes of this policy.

Although the Pet Policy is applicable for all CMHA properties, only elderly or handicapped residents of high-rise or elderly properties are allowed to have fur-bearing pets (dogs and cats). For FY2002, CMHA is amending this policy to allow residents of CMHA single-family scattered site housing to own dogs and cats that are within the specified size restriction. All other defined pets may be kept at any CMHA property.

Pets must be appropriately leashed, caged, or contained when moving through a building, and will not be permitted in any public meeting or community rooms, dining areas, laundry rooms or other public gathering spaces. All pets must be registered with Management, and a Pet Security Deposit equivalent to one month's rent is required. The Pet Policy also lists the registration process, discusses sanitation, defines unacceptable behavior, and the need to identify an alternate caretaker.

This Pet Policy is included in the CMHA Admissions and Continued Occupancy Policy (ACOP), which was subject to the same public review and Public Hearing process as the FY2001 PHA Plan. It was adopted at the November 1, 2000 Board of Commissioners meeting, and was amended at the October 3, 2001 Board of Commissioners meeting.

## Attachment L

### Progress Statement on Goals and Objectives

Progress in meeting Goals and Objectives of the Five-Year Plan (2000-2004) through July 2003:

#### **Section 8 program:**

- achieved high-performer rating from HUD for 2000, 2001 & 2002 performance under SEMAP
- achieved 98% voucher utilization during 2000, increased it to 99.6% in 2002 & 100% in 2003
- applied for 50 vouchers under HUD's FY2003 Mainstream allocation
- applied for and received 198 vouchers under HUD's FY2002 Fair Share allocation
- applied for and received 816 vouchers under HUD's FY2001 Fair Share allocation
- applied for and received 643 vouchers under HUD's FY2000 Fair Share allocation
- applied for and received 200 non-elderly disabled vouchers in 2000
- increased payment standard to maximum level allowed by HUD
- implemented Homeownership program in 2003
- implemented a web-site to provide housing information for tenants and landlords, and promote fair housing opportunities
- developed a working relationship with current owners and recruited new owners through formation of a Section 8 Advisory Council, a Quarterly Newsletter, and annual conferences in 2000, 2001 and 2002

#### **Public Housing program:**

- increased occupancy (reduced vacancies) by 412 units in 2002, and 184 through June 2003
- decreased vacancy rate adjusted for modernization from 8.1% at 12/99 to 5.4% as of 6/30/03
- maintained standard performer designation and improved scores under PHAS with 82.7% in 2000 to 84.5% in 2001 to 87.5% in 2002
- improved PHAS score under Resident Satisfaction indicator from 8.4 in 2000 to 8.5 in 2001 to 8.7 in 2002 (of 10 possible points)
- submitted Designated Housing Plan for the elderly to HUD in 2000, which was approved and implemented in 2001, and was amended in 2002
- submitted Site-based Waiting List Plan to HUD in 2000
- partnered with the Cleveland Housing Network to submit two tax credit applications in 2001 for development of Carver Park replacement public housing units and new unsubsidized housing for the NOAH/Hope project – resubmitted and received in 2002
- submitted a FY2001 HOPE VI application for Valleyview Homes – will resubmit in 2003
- neared completion of 1993 HOPE VI with final phase of 111 units at Outhwaite in 2002
- moved 1995 HOPE VI project toward implementation with completion of design work and selection of a developer in 2002 – demolished 373 units and began phase 1 of construction
- moved 1996 HOPE VI project toward implementation with successful design charrette in 2001, and anticipated selection of developer in 2003 – started construction at Lakeview in 2002
- proceeded with demolition plans - 135 Riverview family units (2000), 142 Carver Park units (2001) + 241 (2003), 270 King Kennedy North units (2002), and 102 Outhwaite units (2003)
- implemented replacement housing strategy for King Kennedy North (including replacement units for Outhwaite) - units demolished in 2002 - construction of 98 new units began in 2003
- evaluated public housing stock as part of needs analysis completed in 2000
- completed Housing Conversion assessment in 2001
- assessed effectiveness of supportive services provided by the Resident Services department, and implemented reorganization in 2001

## Attachment M

### Resident Membership of the PHA Governing Board

#### Cuyahoga Metropolitan Housing Authority Board of Commissioners:

	Appointing Authority	Current Term	Term Expires	Name of Commissioner	Date Appointed
1	Cleveland Mayor	10/02 - 10/05	10/24/2005	Rev. Larry L. Harris, Sr.	11/21/01
2	Cleveland Mayor	10/01 - 10/04	10/24/2004	<b>Doris Jones (resident)</b>	1/9/02
3	Cleveland City Council	10/02 - 10/05	10/24/2005	Robert C. Townsend II Chairman	2/3/88
4	Cleveland City Council	10/01 - 10/04	10/24/2004	<b>Dwayne Browder (resident)</b> Vice-Chairman	3/12/90
5	East Cleveland	10/03 - 10/06	10/24/2006	Mae E. Stewart	4/7/99

#### **Background:**

In the State of Ohio, public housing agencies are created under chapter 3735 of the Ohio Revised Code as Metropolitan Housing Authorities. The territorial limits of a housing authority are defined by the state director of development, which for CMHA includes all of Cuyahoga County except for Chagrin Falls Township.

The board of a housing authority shall consist of five members appointed for three year terms and shall serve without compensation. For any housing authority district that contains a population of at least one million, as does the Cuyahoga MHA:

- two members shall be appointed by the municipal legislature authority of the most populous city in the territory;
- two members shall be appointed by the chief executive officer of the most populous city in the territory; and
- one member shall be appointed by the chief executive officer, with approval of the municipal legislature authority, of the city which has the second highest number of housing units owned or managed by the authority.

*After March 15, 1983, at least one of the board members appointed by the chief executive officer of the most populous city shall be a resident of a dwelling unit owned or managed by the housing authority.*

## **Attachment N**

### **Membership of the Resident Advisory Board**

The Resident Advisory Board for the FY2004 PHA Plan process consists of:

Public Housing members:

Jay Arrington  
Lillian Davis  
Maggie Larry  
Barbara Tate

Section 8 members:

Ruby Anderson  
Sheila Babus  
Lynnda Goldsborough  
Carla Griffin

## **Attachment O**

### **Section 8 Project-Based Vouchers**

The Cuyahoga Metropolitan Housing Authority (CMHA) will complete the initial implementation of a Project-based Voucher Program during 2004. The size of the program will not exceed 20% of the tenant-based voucher program within CMHA's jurisdiction. CMHA will exercise this option with the goal of making affordable units available to low-income families in areas that: 1) meet HUD's deconcentration criteria, and 2) will encourage property owners to convert existing units, construct new units, or upgrade existing rental housing stock, thereby increasing the number of units available to low income families.

The total number of project-based units will not exceed 20% of the baseline number of units in the tenant-based voucher program, and CMHA will not allocate vouchers currently issued or under contract for this purpose. CMHA will initiate this program by entering into a contract with one developer for 40 units during 2004.

The goal for future developments using project-based assistance will be consistent with HUD's directive to award them in census tracts with poverty rates of less than 20%, as will be determined from 2000 census data, unless specific exceptions are identified that would require HUD approval, and will result in a reasonable choice of buildings or projects to be provided project-based assistance when CMHA solicits applications.

CMHA believes that project-based assistance is needed in Cuyahoga County to increase the number of rental units made available to Section 8 program participants in low poverty areas. The new provisions of the project-based program make it more feasible to expand assisted housing opportunities into these areas and could assure their availability for a period of up to 10 years.

Project-based voucher assistance provided by CMHA would be consistent with new HUD regulations, which include some of the following provisions: project-based assistance may now be used for existing units in addition to newly constructed or rehabilitated units; project-based assistance is now capped at 25% of the dwelling units in any one building, with exceptions for single family properties and dwelling units specifically for the elderly families, disabled families, or families receiving supportive services; project-based assistance may now be provided for a term of up to 10 years, subject to the future availability of appropriated funds; and other administrative issues concerning rents, tenant selection, family choice to move, vacant units, unit inspection and housing quality standards. CMHA has guidelines for public advertisement and competitive selection of units to be assisted with project-based voucher assistance.

## **Attachment P**

### **Section 8 Homeownership Capacity Statement**

The Cuyahoga Metropolitan Housing Authority will require that financing for the purchase of a home under its Section 8 Homeownership program will: be provided, insured or guaranteed by the state or Federal government; comply with secondary mortgage market underwriting requirements, or comply with generally accepted private sector underwriting standards. The required minimum down payment is 3% with at least 1% of the down payment from the family's resources.

CMHA has a Homeownership Manager on staff, solely dedicated to the development and management of this program.

## **Public Comments and CMHA Response**

The following is a summary of the comments that were received verbally and/or in writing during the public review process for the FY2004 PHA Plan, including the CMHA response. In addition to the Public Hearing held on September 17, 2003, CMHA also held two meetings with our community partners: one to discuss changes to the Section 8 Administrative Plan on September 5, 2003, and another to discuss the PHA Plan and changes to the Admissions and Continued Occupancy Policy on September 9, 2003. Most of the written comments were submitted by Peter Iskin of the Legal Aid Society, who we would again like to acknowledge for his thorough review and thoughtful comments on these PHA Plan documents. Comments were also submitted by Brian Davis of the Northeast Ohio Coalition for the Homeless (NEOCH), and others as noted.

The comments, followed by a CMHA response, are compiled for each of the following documents by topic and listed sequentially by section.

- A. Public Housing Agency Plan, which consists of a Five Year Plan for Fiscal Years 2000-2004 (“Five Year Plan”); and an Annual Plan for Fiscal Year 2004 (“Annual Plan”);
- B. Changes to the Admissions and Continued Occupancy Plan (“ACOP”); and
- C. Changes to the Section 8 Administrative Plan.

### **A. Public Housing Agency Plan (PHA Plan) for FY2004**

#### **1. Admission Preferences -- Annual Plan at § 3.A.4.c.; ACOP at § 2.09(2); and ACOP at Glossary (definition of preference)**

**Comment a.** CMHA proposes to rescind the admission preferences that are now established in the ACOP at § 2.09(2)4 (working or disabled) and § 2.09(2)5 (enrolled in education or training programs). This proposal is appropriate and should be implemented. CMHA also proposes to rescind the admission preference that is now established in the ACOP at § 2.09(2)3 (homeless persons). This proposal is inappropriate and should not be implemented because it is inconsistent with the Consolidated Plan of the City of Cleveland. [Legal Aid Society]

**Comment b.** As we are all aware, homelessness remains a major challenge in our community. The combination of a weak job market and rising costs for housing continues to force families and individuals into the already crowded shelter system. Over the past year, there have been increased efforts to move people out of shelters and into permanent housing. CMHA has played a significant role in this, particularly for single persons over 50 years old. I want to commend the work of you and your staff in helping expedite this process. However, in spite of some successes in this area, the need for access by the homeless to affordable housing remains great, particularly for families and non-elderly single persons. It is essential that CMHA continue to play a leading role in helping the community address this critical need. I believe that the proposed elimination of homelessness as a designated preference in CMHA’s admissions policy would be seriously detrimental to this objective and would be inconsistent with the strategies described in the City’s Consolidated Plan. I hope you will strongly consider retaining the

homeless preference in your admissions policy when your 2004 Plan is submitted for final Board approval. [Linda Hudecek, Director, Department of Community Development, Cleveland]

**Comment c.** I (Dennis J. Kucinich) do not believe that it would be a good idea at this time to eliminate the housing preference for persons who are homeless. This preference has enabled many homeless persons and families to get back on their feet after experiencing homelessness. With homelessness rates high and rising, it is important that CMHA continue this compassionate program which is so important to persons who are homeless. As you finalize the FY2004 PHA Plan, please restore the homelessness preference. [Dennis J. Kucinich, Congressman, 10<sup>th</sup> Dist.]

**Comment d.** Do not eliminate the preference for homeless people. We (NEOCH) strongly oppose this elimination of the preference for homeless people. While we agree that we need to bring some control over the waiting list, sending the message to the community that homeless people are not a priority is not the right message. We trust that you will remove this part of the plan after the City of Cleveland determined that this was inconsistent with the Consolidated Plan. We also know that the City Council of Cleveland passed a resolution in opposition to this plan. We hope that CMHA will restore the preference to come into compliance with the Consolidated Plan and figure out a better strategy for the waiting list. NEOCH would be happy to work with CMHA on a plan. [NEOCH]

**Comment e.** Although appreciative of the change that adds back the homeless preference and of the recommendation to become more proactive in the homelessness issue, it won't matter much unless CMHA gets more resources. [Sister Donna Hawk]

**Comment f.** The May Dugan Center is a multi-service center which provides advocacy and services to low and moderate income people. It has come to our attention that the CMHA Annual Plan for 2004 includes an elimination of the preference of homeless people applying for housing. This action implies persons without current housing will be given less priority in finding permanent housing. As an agency committed to advocating for the inherent rights of underrepresented individuals, this proposal initiates great concern for the underlying injustice it suggests for homeless persons. With a current waiting list of 9000 people for CMHA housing, shouldn't families and individuals struggling without permanent housing have first priority? We believe that this action to eliminate the homeless preference would greatly harm current and future homeless people, and would set homeless people back tremendously in the community. We ask that the Housing Authority please reconsider their current proposal on this issue and maintain the homeless preference in housing placements in the CMHA Annual Plan for 2004. [Janice Eaton, May Dugan Center]

**Comment g.** The purpose of this letter is to ask you not to remove the preference for homelessness in your priority list for housing. This is an extremely vulnerable population usually having many more issues than just housing needs and frequently includes people with disabilities. As a caring community, we need to assist them as much as possible. [Lynn Hildebrand, Executive Director, Services for Independent Living]

**Comment h.** Homelessness – hundreds of people who don't have a place to lay their head at night – is a critical issue in Cleveland and must be dealt with as the emergency it is. CMHA's proposal to eliminate the homeless preference in 2004 is unconscionable. Why is it so difficult

to see and understand that those without homes need CMHA first? The homeless can often be a difficult group to work with, and special services are often needed. But the overriding fact is that Clevelanders do not want to live in a city that can't house its own. The elimination of the homeless preference on CMHA's waiting list is a violation of the Cleveland Consolidated Plan 2000-2005. This proposal must not go forward. CMHA exists to provide housing to those that need it, it is one of the few places the homeless can turn, and it is funded by our tax dollars. We need to do whatever it takes to assist those who can't afford housing to make a stable life for themselves, and the resources controlled by CMHA must be provided to those most in need. [MaryAnn Toth]

**CMHA Response:** Prior to the Public Hearing, CMHA received a significant response to the change that proposed reducing the number of preferences from six to three, which would no longer include the homeless preference. As a result, CMHA has reconsidered making this change, and has revised the proposed change in preferences to the following (as summarized in the revised FY04 PHA Plan Changes table that was distributed at the Public Hearing):

CMHA will only eliminate one preference, the one for those Enrolled in education, training or upward mobility programs. We will continue to maintain the preferences for Homelessness and Working Families, as well as those for Involuntary Displacement, Successful completion of substance abuse programs and Veterans, which all will be equally weighted. In addition, the definition of Homelessness will be changed to include "with referral letter from recognized homeless shelter."

Chairman Townsend stated that it is not fair to expect one agency or one city to address the homeless problem. He questioned why as a community we wait until it's cold before taking any action for the coming winter. We ought to meet and develop strategies for addressing the homeless problem, and CMHA is willing to be an active participant in these discussions.

**Comment h.** In response to changing the definition of homelessness to include "with referral letter from recognized homeless shelter," Brian Davis suggested that the referral letter should be accepted from any recognized homeless "agency." [NEOCH]

**CMHA Response:** CMHA would prefer to implement this new requirement as initially stated, and would encourage other homeless agencies to work with and through the recognized shelter providers. If this approach becomes unworkable, CMHA would consider making this change in next year's Plan.

**Comment i.** Last year, the Housing Authority redid the waiting list so that the preferences were real priorities for the Authority. We do not believe that the people on the existing waiting list were notified of the change in the waiting list. I hope this year if there is any change in the preference (elimination of one of the preferences) then the entire list will be notified so that they can correct their application if they fall under the preference that is eliminated. [NEOCH]

**CMHA Response:** CMHA anticipates making the preference changes effective at the beginning of 2004. As part of the implementation process, CMHA will notify all applicants of these changes and allow them to update their application information accordingly.

**Comment j.** CMHA proposes to limit its admission preferences to the three categories that are now established in the ACOP at § 2.09(2)1 (successful drug-treatment), § 2.09(2)2 (involuntary displacement), and § 2.09(2)6 (veterans), and to provide the same level of preference to each of these categories. If CMHA limits its admission preferences to these categories, CMHA should establish a higher admission preference for the involuntary displacement category than the other two preference categories. Generally, the involuntary displacement applicants need housing more urgently than the other applicants. [Legal Aid Society]

**CMHA Response:** In order to ease the transition from ranking preferences to treating them all equally, CMHA would prefer to implement them as stated (all with equal weight). However, CMHA will monitor this situation and if it proves to be a problem, will make the appropriate adjustment in next year's Plan.

## **2. Minimum Rent -- Annual Plan at § 4.A.(1)**

**Comment a.** CMHA proposes to retain its public housing minimum rent of \$25, along with the requisite hardship exceptions. If CMHA retains this minimum rent, it must remedy the recurring failure of CMHA staff to implement the CMHA (and HUD) minimum rent hardship exception rules. For example, during reexaminations, CMHA staff often fail to inform minimum rent tenants of the minimum rent hardship exceptions, notwithstanding the CMHA policy that requires such notice (see ACOP at page 3-15). Alternatively and preferably, CMHA should revise its public housing minimum rent so as to establish a minimum rent of \$0. A minimum rent of \$25 is an unfair policy in that it creates a rent formula that requires the families that have the least income (and often no income) to pay a higher percentage of their income for rent than the relatively higher income families. It is also an unfair policy in that it requires families that have minimal or no income to pay an amount of rent that they cannot afford to pay. CMHA should not maintain a policy that closes its doors to the families that have the least income. [Legal Aid Society]

**Comment b.** We (NEOCH) urge you for the fifth year in a row to drop the \$25 minimum rent for those in public housing. It is an administrative burden for staff to sort through hardship exemptions, and unfairly burdens those without income. I am not sure that tenants are aware that they qualify for minimum rents. I cannot see a reason to treat those making under \$75 a month any different than other tenants. [NEOCH]

**CMHA Response:** While the minimum rent issue continues to draw opposition from within the community, CMHA will again retain a \$25 minimum rent for the public housing program in 2004. One of the primary reasons that CMHA has retained the \$25 minimum rent was for the message that it conveys - if someone is receiving something of value, they should have to pay something for it. And, if they have to pay something, they are more likely to feel a sense of ownership for the property at which they live. As relief from this payment and in accordance with HUD requirements, CMHA offers protection from eviction through the hardship exemption. CMHA has reviewed the hardship exemption process and has made adjustments to assure that residents are informed of their right to request a minimum rent hardship exception at their annual reexamination, and taking it a step further, also when they first become delinquent in their rent payments to CMHA.

### **3. Demolition of Dwelling Units -- Annual Plan at § 8.2**

**Comment a.** CMHA proposes to demolish all of the 243 dwelling units at Valleyview. The Valleyview demolition proposal is appropriate and consistent with applicable laws, provided CMHA timely and fully implements its redevelopment and replacement housing plans, which are summarized in the two letters dated July 24 and August 19 from the Peter Iskin, Mike Foley, and Gail Long. [Legal Aid Society]

**Comment b.** We (NEOCH) ask that the agreement worked out by CMHA and local activists be included in the planning document so it is clear that there will be a timely and full redevelopment and replacement of the properties demolished. [NEOCH]

**CMHA Response:** The redevelopment and replacement housing plans for Valleyview have been included in a resolution passed by the CMHA Board, which should demonstrate CMHA's commitment to carrying them out, and are in accordance with the strategies summarized in these letters. All Demolition Plans, including Valleyview, are kept on file as supporting documents to the Agency Plan.

**Comment c.** CMHA proposes to demolish 48 dwelling units at Garden Valley. Why is CMHA demolishing these units? Does CMHA have any redevelopment or replacement housing plans for this demolition? [Legal Aid Society]

**CMHA Response:** These 48 units are located in two buildings (C-40 and C-41) off of East 73<sup>rd</sup> Street, which have been vacant for several years. They were taken off-line to create space for a second Miracle Village type-program that never came to fruition. They are now in very poor condition, and are not worth rehabilitating, so should be demolished. Garden Valley is in line for the next big modernization project, and CMHA will initiate a planning process in 2004 for the redevelopment of this site, which will include replacement of these and any other demolished units in accordance with CMHA policy.

**Comment d.** CMHA proposes to demolish a scattered site unit at 2042 West 44<sup>th</sup> Street. Why is CMHA demolishing this unit? [Legal Aid Society]

**CMHA Response:** This unit has been so infested by termites that it is not worth preserving. CMHA believes the only solution is to demolish it and eventually replace it with a new scattered site unit in accordance with CMHA policy.

### **4. Disposition of CMHA Property -- Annual Plan at § 8.2**

**Comment a.** CMHA proposes to dispose of vacant land on Crestline Avenue, which is across the street from Crestview. Why is CMHA proposing to dispose of this vacant land? Is this land suitable for development of affordable housing? If it is suitable for such development, why is CMHA not using the land for its replacement housing programs? [Legal Aid Society]

**Comment b.** Councilwoman Merle Gordon spoke in favor of the proposed donation of 4.5 acres of vacant ravine land across from Crestview as a donation to the City for development of the Treadway Creek Greenway, which will include a walking trail that will connect Harmody Park to the Canal Towpath Trail. She stated that this project was important to build community and would benefit Crestview residents. As spokesperson for this project, she presented letters of support from Natalie Ronayne, Director of the City of Cleveland Department of Parks, Recreation and Properties, Tim Donovan, Director of the Ohio Canal Corridor, and Brian Cummins, Executive Director of Old Brooklyn Community Development Corporation.

**CMHA Response:** This vacant land is a ravine area located across from Crestview Apartments on the other side of Crestline Road. The land is not suitable for housing development so CMHA was willing to work with the City of Cleveland on its proposal to use it as part of the Treadway Creek Greenway, which seems to be the highest and best use of this property. Chairman Townsend expressed his support for this project and encouraged staff to proceed expeditiously.

**Comment c.** CMHA states that it “is also considering development proposals that might require the disposition of vacant land at Woodland near East 51<sup>st</sup> and Superior near East 89<sup>th</sup>” (Executive Summary at page 4). Does this mean that CMHA may dispose of these parcels of land during fiscal year 2004? If so, why are these disposition plans not stated in the Annual Plan at § 8.2? And, what are the development plans that may prompt CMHA to dispose of these parcels of land? [Legal Aid Society]

**CMHA Response:** CMHA does not believe that housing development is feasible at these sites. Since CMHA has been approached in the past by developers interested in building commercial facilities on these vacant sites, they have been included as potential disposition sites in the 2004 Agency Plan. In addition to being mentioned in the Executive Summary, these disposition plans are presented in the Annual Plan under section 8.2. CMHA will follow the HUD-required public process if disposition of this land is part of any future development plans.

**Comment d.** CMHA staff from Housing Services and Legal have indicated that someone has expressed an interest in a vacant parcel of land near Willson Apartments. It should be added to the Agency Plan as a disposition in case CMHA determines that it would be in the best interests of the Agency to dispose of it. [Gwen Haggins]

**CMHA Response:** Since HUD requires that the disposition of public housing property be part of the PHA Plan, CMHA will include this vacant parcel.

## **5. Designated Housing for the Elderly -- Annual Plan at § 9.2**

**Comment:** HOPE VI Coordinator Michael Bowen requested that the number of elderly designated units at Union Court be increased from 39 units to 48 units. These are part of a replacement public housing project in Mt. Pleasant that is in the process of being developed. HUD tentatively approved the designation of these units as elderly-only in the 2003 PHA Plan pending their completion. [CMHA staff]

**CMHA Response:** CMHA will make this change to the PHA Plan and will request an amendment to the Designated Housing Plan with HUD so that this project can proceed.

## **6. Community service programs-- Annual Plan at § 12.B.**

**Comment a.** Disposition of Manor Program at Riverview – We (NEOCH) would like to have in the plan the final disposition of the Manor Program at Riverview. These are some 35 units that were renovated and are sitting empty. We ask that the Authority identify what will happen to these units over the next year. [NEOCH]

**CMHA Response:** These units were part of the Manor at Riverview and were designed to accommodate an assisted-living type program. As such, CMHA will hold these units off-line for at least the next year with the expectation that a program can be reestablished to serve this need. Given there are some current proposals for a Medicare waiver that would make this program financially viable, CMHA believes that it is worth waiting to see if something transpires.

**Comment b.** Miracle Village oversight – CMHA had a problem with the service provider at Miracle Village in the past. We (NEOCH) would like to see in the plan some goals around performance and outcomes that the Authority will hold the new provider to. We believe that Miracle Village is a unique opportunity for people with addiction problems, but the program needs to be supervised closely to assure full utilization and that the goals of the program are met. We would be more comfortable with it spelled out in the plan the goals of Miracle Village, and how they will be monitored by the Authority. [NEOCH]

**CMHA Response:** CMHA also believes that Miracle Village is a valuable program, and the program was recently restarted with a new provider. While CMHA only funds a small part of their budget, we have established performance goals that we will monitor more closely than the previous provider allowed us to.

**Comment c.** Triumph House was a needed program in the community serving families with young children. I (Brian Davis) know that the program has changed to serve men, but that creates a gap in services to families with young children. I would like to see in the Plan a goal of applying for funding with a local service provider to serve homeless families with young children. I think that this is an important constituency that is underserved in our community. [NEOCH]

**CMHA Response:** CMHA remains interested in being part of a transitional housing program that serves families with young children, and would be receptive to working with a local service provider to apply for an appropriate level of funding that might be available for this type of program.

## **B. Admissions and Continued Occupancy Policy (ACOP)**

### **1. Organization and Management of the Waiting List {Section 2.07}**

**Comment:** Public Access to Application Number - another area that would help homeless people who are often skipped because their inability to receive messages would be to assign people numbers when they turn in an application and then put on your website which numbers are currently being processed. This would allow a homeless person to go to your website and see if their number was drawn this month and they would know to contact the CMHA office on their own. In this technological age of the internet, we need to find a better way to get information to people without housing. Agencies then could print out the lists and display them in their shelters and drop in centers. I believe that you would have a better rate of contact through posting an application number on a website or in your application offices. [NEOCH]

**CMHA Response:** CMHA understands the difficulty of reaching homeless applicants, which is why we are working with Bridging the Gap and other homeless providers to identify and assist homeless applicants in the CMHA housing process. During 2003, CMHA initiated a new process of allowing the homeless to use a provider's address, which should help alleviate this situation and seemed to work well for the many homeless applicants age 50 or older that were housed under the 50+ special initiative program. In addition, applicants are encouraged to update their application information and can inquire to their place on the waiting list. Although CMHA does have a website, it would not be manageable at this time to post and update information for the 500 applicants being processed every month.

### **2. Banning Policy -- ACOP**

**Comment a.** CMHA should modify its newly enacted Banning Policy and then add the modified policy to the ACOP. The Banning Policy to which this comment refers is the policy that is summarized in a letter from George A. Phillips, Acting Executive Director, to CMHA Residents, dated August 25, 2003. CMHA should modify the Banning Policy in at least seven respects: [Legal Aid Society]

First, CMHA should establish an objective standard for determining whether a person may be banned from CMHA property.

Second, under that standard, CMHA should not be permitted to ban a person simply because it "suspects certain individuals [including the banned person] of being criminal perpetrators." Rather, all of the criteria should be based on the actual and verified conduct of the person.

Third, those criteria should be limited to a person's criminal activity that threatens the health or safety of CMHA residents or CMHA employees, such as violent or drug-related criminal activity.

Fourth, the Banning Policy should provide, and the "Banned Notice" should specify, that the banned person may request an administrative hearing, within a specified reasonable period of time, before an impartial CMHA employee or agent, at which the banned person may contest the CMHA banning decision. One possible forum for providing this hearing would be the CMHA grievance procedure.

Fifth, the Banning Policy should permit any interested CMHA resident to appeal the banning decision pursuant to the CMHA grievance procedure. For this purpose, an interested CMHA resident is a CMHA resident who seeks to invite the banned person to his/her dwelling unit as a guest. And, the time period within which a CMHA resident may submit this grievance should commence on the first day that the resident has actual knowledge of the banned person's status.

Sixth, the Banning Policy should not permit CMHA to take any adverse action against a CMHA resident, relative to the Banning Policy, unless the resident permits a banned person to enter the resident's dwelling unit after the resident has actual knowledge of the banned person's status.

Seventh, the Banning Policy should provide CMHA with discretionary authority to permit an otherwise banned person to enter CMHA property for the purpose of visiting a specific dwelling unit, at specified times, and for a specified purpose, such as a child visitation.

**Comment b.** We (NEOCH) support the comments submitted by Legal Aid, and add one comment. We feel that it would not be a tremendous burden to allow an individual an administrative hearing to appeal a ban from CMHA property. We feel that in the rare instance that there is misidentification it would be cheaper for the Authority to allow a hearing than have to go to court to correct. I doubt if this would ever happen, but it would be better to have a hearing that is extended to tenants than to have to go to court. [NEOCH]

**CMHA Response:** CMHA believes that several of the issues raised above are covered in the actual Banning Policy, a copy of which was recently given to Mr. Iskin. This policy, which was passed by the CMHA Board in June 2003, is being added to the ACOP as section 7.10. The Banning Policy allows any interested CMHA resident to appeal the banning decision pursuant to the CMHA grievance procedure. The issue of misidentification can be resolved by checking the social security number of the person in question with the CMHA Police Department.

### **3. Income Verification with SWICA Data – ACOP § 6.02**

**Comment a.** CMHA should add to the ACOP its new policies on verifying income with the SWICA wage and unemployment benefit claim data. This policy should provide that, during each CMHA determination of a resident's income (annual or interim), CMHA shall notify the resident that CMHA will be verifying the resident's income with the SWICA data. This policy should also provide that, if the SWICA data verifies a higher household income than the resident reported, CMHA shall enter into a reasonable repayment agreement with the resident for any unpaid rent, unless the resident's inaccurate reporting of income constitutes serious fraud. [Legal Aid Society]

**CMHA Response:** CMHA agrees and will add the suggested language as paragraph (3) under this section.

### **4. Occupancy Standards -- ACOP at § 4.03(3)E**

**Comment a.** CMHA proposes to change the occupancy standard so as to require two children of the same sex to share a bedroom, “unless their ages are 5 years or more.” This proposal seems to permit any child who is at least 5 years old to be assigned his/her own bedroom. If this is CMHA’s proposal, it seems to be an inappropriate allocation of CMHA’s housing resources. If this is not CMHA’s proposal, the proposal should be written more clearly. [Legal Aid Society]

**CMHA Response:** CMHA has changed this statement to read: “unless their ages are 5 years or more apart.”

## **5. Transfer Policy -- ACOP at § 4.05**

**Comment a.** CMHA proposes to add two items to its list of permissible administrative transfers, one of which is transfers arising from a “failure of HUD to provide adequate operating subsidy to CMHA to provide operating subsidy for public housing eligible families at a Hope (sic) VI and/or mixed finance development site.” Why should the amount of the operating subsidy that CMHA receives from HUD be grounds to transfer a public housing tenant from a HOPE VI development? Does the rationale, whatever it may be, apply if CMHA has not received private financing for the development? What would constitute an inadequate operating subsidy so as to justify these transfers? Would such transfers be limited to public housing tenants who have an income below a certain level? Or, would such transfers be applicable to all public housing tenants who reside at the development? [Legal Aid Society]

**CMHA Response:** This language is necessary to ensure continued housing for residents at a HOPE VI or mixed finance development site in the event CMHA is unable to meet its contractual obligation for funding as a result of reduced HUD operating subsidy allocations. This provision is required in the ACOP by HUD and the negotiations regarding operating subsidies for these sites set the subsidy at a level where reduced subsidy allocation by HUD should not impact the Authority’s ability to meet contractual obligations.

**Comment b.** CMHA proposes to add numerous details on its procedures for processing transfer requests. In 2002, CMHA removed these types of procedural details from the ACOP and stated that those procedures would be inserted into a separate document titled CMHA’s Transfer Procedures. Did CMHA insert those procedures into a separate transfer document? If so, why is CMHA re-inserting those types of procedures into the ACOP? If not, why has CMHA changed its view on this matter during the last year? [Legal Aid Society]

**CMHA Response:** The proposed section on processing transfers will be removed as a change to the ACOP and will be incorporated into the Transfer Procedure. Last year, a Transfer Procedure was developed and posted at the CMHA Management Office at each property. It will also be considered part of the supporting documentation for the PHA Plan.

## **6. Innocent Tenant -- ACOP at § 5.04**

**Comment a.** CMHA should add to the ACOP a new § 5.04(9) to address the matter of innocent tenants, relative to criminal activity of a household member (other than the tenant), a guest, or

another person under the tenant's control. An innocent tenant means a tenant who did not participate in, and neither knew nor reasonably should have known of, the criminal activity. The new § 5.04(9) should read: [Legal Aid Society]

When the grounds for CMHA's termination of a tenancy is the criminal activity of a member of the household (other than the tenant), a guest, or another person under the tenant's control, and the criminal activity occurs outside the rental unit, CMHA shall not be required to prove that the tenant knew, or reasonably should have known, that the person was engaged in or was likely to engage in the criminal activity. However, if CMHA commences an eviction action based on this termination of the tenancy, a defense to the eviction action, which the tenant may raise, is that the tenant neither knew nor reasonably should have known that the person was engaged in or was likely to engage in the criminal activity.

Under this defense, the burden of proof is on the tenant. The tenant must prove the defense by a preponderance of the evidence.

If the tenant prevails on this defense, CMHA may still evict and/or bar from the rental unit the person who engaged in the criminal activity.

Comment b. We (NEOCH) support Peter Iskin's suggestion to protect the innocent tenant who did not have any knowledge of criminal behavior and is able to prove this fact. We do not think that it is reasonable to evict an innocent tenant who reasonably did not have any information about criminal activity. There could be a tendency to move to strict enforcement of federal policy because the program is fully utilized. This strict interpretation of federal policy will only harm the community by creating more homelessness. We ask that CMHA remain a good partner. And not begin to increase evictions in order to open up units. [NEOCH]

**CMHA Response:** CMHA declines the proposal to add "innocent tenant" language to the ACOP in cases where the criminal activity occurs "outside of the rental units." The United States Supreme Court thoroughly reviewed and determined that the 1998 statute requiring specific lease language that made drug related criminal activity by tenants, members of the tenant's household, guests, or other people under the tenant's control, on or off housing authority property, cause for termination of tenancy, and HUD's regulations contained no limitation based on the tenant's actual knowledge or control over the person whose drug related crimes provided the grounds for eviction by the Agency in recent case law. The Supreme Court additionally determined that solid policy arguments supported the statutes and regulations applicable to "innocent tenants" by stating that "tenants who are unable to control drug crime among members of their household, guests, or others under their control present as much of a threat to neighboring tenants as tenants who are aware of the drug crimes taking place."

However, CMHA has the ability on a case by case basis to exercise its discretion based upon mitigating circumstances or information obtained in Court or otherwise, and does in fact often evict or bar the person engaged in the criminal activity in such cases, as opposed to evicting an entire household or family. CMHA will continue to exercise such discretion in accordance with its overall mission of providing safe, decent housing to eligible low income individuals and families.

## **C. Section 8 Administrative Plan**

Mr. Iskin's formal written comments are paraphrased below and available for review in the original written format. The comments below reflect both his verbal comments and the written submission. Brian Davis, Executive Director, Northeast Ohio Coalition for the Homeless, also submitted written comments that are paraphrased below and are available for review. Other comments were received during the September 5 meeting by Peggy Curtis, Cleveland Office of Housing & Urban Development; Marvella Donald, New Life Community; Ruth Gillett, Office of Homeless Services; Kathryn Kazol, EDEN, Inc.; Valeria Bledsoe, Cuyahoga County Community Mental Health Board, and Jimmie Pope, Nuban Management (Section 8 landlord).

### **1. Repayment Agreements for Applicants**

**Comment a:** Regarding repayment agreements in Chapter 2, Mr. Iskin commented that CMHA needs to clarify at what point the agreement must be in place and current. He suggested that CMHA clarify the policy to state that Section 8 will inform the person of their debt at the time of the initial application process and that an existing current repayment agreement be in place at the time the full application is submitted.

**Comment b:** Mr. Davis also recommended clarifying this section. He recommended that families on the waiting list be informed of debts while they are still on the list. This will enable them to begin the payment process before they are offered a voucher.

**CMHA Response:** Section 8 will inform applicants of their debt at the time of the full application. Persons who are disabled will be offered a repayment agreement. Non-disabled applicants will be given a reasonable amount of time to make payment in full.

**Comment c:** Ms. Bledsoe inquired as to whether the repayment wording also covered applicants from other housing authorities.

**CMHA Response:** If another housing authority ports a person in good standing, we accept the person. CMHA does not check debts with other housing authorities.

### **2. Opt-Out Voucher Screening**

**Comment a:** Mr. Iskin commented regarding enhanced voucher (opt-out) screening. He said these applicants should not be screened beyond mandatory factors which include persons evicted from federally assisted housing for drug-related criminal activity; current users of illegal drugs; persons who engage in illegal drug use that may threaten the health, safety or right to peaceful enjoyment of the premises of other residents; persons convicted of manufacturing methamphetamine in federally assisted housing; registered sex offenders; persons who abuse alcohol in a manner that may threaten the health, safety or right to peaceful enjoyment of the premises by other residents; and persons who fail to submit consent forms for obtaining assistance. The purpose of these vouchers is to ensure people are not displaced. The family is merely switching forms of Section 8 assistance. He cited a legal basis for his opinion.

**Comment b:** Mr. Davis supported Mr. Iskin's comments.

**CMHA Response:** Section 8 believes its normal screening process should be implemented for opt-out voucher applicants. Section 8 has a responsibility to the community ensure that Section 8 clients meet certain minimum standards.

### **3. Certified Special Admissions**

**Comment a:** In Chapter 4, Ms. Curtis recommended that CMHA strike the entire certified special admissions section. She said special admissions are only defined by HUD. CMHA can address its desire to accommodate displaced public housing residents as a preference to the waiting list, but not as a directive from the Executive Director. CMHA could open its waiting list to special groups only, such as displaced public housing residents.

**Comment b:** Ms. Kazol inquired as to what preference level would be granted.

**CMHA response:** The section will be re-drafted to reflect Ms. Curtis' recommendation that this be addressed as a preference. The preference will be the top priority, to protect public housing residents already receiving a CMHA subsidy.

### **4. Waiting List**

**Comment:** Regarding page 4-1 of the Admin Plan, "Waiting List", for Targeted Funding, Ms. Curtis inquired whether CMHA will have already gathered targeted program eligibility data at the preliminary application stage.

**CMHA Response:** Yes.

### **5. Mod Rehab Waiting List Referrals and Mod Rehab in the Admin Plan**

**Comment a:** Mr. Iskin expressed his opinion that the system for generating referrals for the Mod Rehab program should be revised. He said the Mod Rehab waiting list is landlord generated. Landlords can refuse CMHA referred applicants and then refer their own applicant. This amounts to creating private waiting lists, which is inappropriate. If the waiting list is closed to the community, it should be closed to landlord referrals. Landlord-referred applicants should not be permitted to apply if the waiting list is closed to other applicants. Landlord-referred applicants should not receive any admission preference (e.g. the 30 points in the Section 8 Plan).

**Comment b:** Mr. Davis agreed with Mr. Iskin's comments regarding the Mod Rehab waiting list.

**Comment c:** Ms. Curtis agreed with Mr. Iskin. If the landlord does not find a suitable applicant in the initial referral, CMHA should continue to refer names. The landlord should only refer

names if the PHA cannot supply names. In addition, she commented that CMHA needs a separate Administrative Plan for the Mod Rehab Program.

**Comment d:** Mr. Iskin agreed with Ms. Curtis' comment that Section 8 should have a separate Administrative Plan for the Mod Rehab Program. If Section 8 intends to use its existing Administrative Plan for the Mod Rehab Program, it should at least define where the Mod Rehab Program is being discussed. However, a separate plan would be preferable. He finds the following sections to be particularly unclear regarding whether the provisions apply to the Mod Rehab Program: 1.) A tenant's obligation to report interim changes in income (Chapter 12, Section C); 2.) A tenant's right to an informal hearing to contest a rent determination (Chapter 12, Section F) and 3.) A tenant's right to an informal hearing to contest a PHA's proposed termination of participation.

**Comment e:** Mr. Pope disagreed with the waiting list comments. He said that in the past, he has received over 100 referrals from CMHA for a unit. In many cases, the referred party does not want the unit. In other cases, the applicant's address is no longer valid. This draws the leasing process out for months. At some point, the landlord needs to lease the unit.

**Comment f:** Ms. Kazol suggested making applicants aware of potential Mod Rehab addresses.

**Comment g:** Mr. Iskin suggested improving the waiting list referral process. Perhaps Section 8 should allow an applicant three referrals before placing their name at the bottom of the list.

**Comment h:** Ms. Curtis pointed out that the regulations allow a landlord to refer an applicant if the PHA does not. She continued that, on page 4-3, if a HAP contract is terminated for owner breach, this is more of a special admission since HUD will give us a voucher.

**CMHA response:** The regulations allow landlord referrals if the PHA is not able to refer a suitable applicant. However, Section 8 will alter the waiting list process to stipulate that the Mod Rehab applicant's name will be placed at the bottom of the list after three referrals are refused. While a separate Admin Plan for the Mod Rehab Program would be preferable, due to time constraints and the fact that the Mod Rehab Program continues to decline in size, it is not possible for Section 8 to generate a separate Administrative Plan at this time. Giving applicants a list of potential Mod Rehab addresses could be misleading since there are currently so few vacancies in this program.

Regarding Mr. Iskin's suggestion for clarification in the Plan for three areas concerning interim reporting, rent determination hearings and termination hearings, CMHA agrees. Mod Rehab participants have been subject to these areas of the Plan, and wording will be clarified to specifically state that Mod Rehab participants are subject to these areas of the Plan.

## **6. Vouchers for the Disabled**

**Comment a:** Ms. Kazol commented that on page 4-2, if the vouchers come into the community earmarked for disabled persons, the Plan should specify they are for disabled persons.

**CMHA response:** Vouchers allocated by HUD for the disabled are only issued to disabled families.

**Comment b:** Ms. Bledsoe inquired as to whether Section 8's information release form was time limited.

**CMHA response:** Yes. It can be used for 15 months. Section 8 has the head-of-household sign a new one at each re-exam.

## **7. Third Party Verification**

**Comment a:** Ms. Curtis suggested wording be added just above the "Third Party Oral Verification" stating that the entire process will be complemented with Upfront Income Verification.

**CMHA Response:** Agree.

**Comment b:** On page 7-2, under "Review of Documents" Ms. Curtis commented that the number should be "within 4 weeks" not two. She said four weeks are needed: Two for written and two more for oral.

**CMHA Response:** The appropriate length of time is three weeks. Written verification will be completed first, and if unsuccessful, telephone verification.

**Comment c:** On page 7-10 Ms. Curtis suggested that under the "Child Care Expenses" and "Medical Care Expenses" sections, the following wording be added respectively: "...coupled with other documents indicating that expenses are in fact incurred" and "...coupled with a review of other documents indicated that expenses are in fact incurred (e.g. copies of checks, office visit receipts).

**CMHA Response:** Agree.

## **8. Contract Effective Date**

**Comment a:** Referring to Chapter 9, Mr. Iskin recommended that CMHA establish an objective, uniform standard for determining the commencement date of a family's lease at a new unit. HUD rules permit the commencement date for the lease to be the date of the passed inspection provided the landlord and tenant have executed the lease and the tenant resides in the unit as of that date, and provided the PHA and the landlord execute a HAP contract within 60 days of that date. The Admin Plan should state that the commencement date of these leases shall be the earliest date (or up to four days thereafter) on which the unit passes inspection and the tenant has commenced occupancy of the unit, provided that Section 8 and the landlord execute a HAP contract within 60 days of that date.

He continued that CMHA's practice complies with the proposed policy when the landlord accepts CMHA's initial rent determination. However, if the landlord disputes the determination and CMHA later modifies it, the date of the modification is used. It appears CMHA may also use some other standards.

He summarized that CMHA's practice is deficient in two ways: First, it lacks a uniform objective standard. Second, the distinction based upon whether the landlord accepts CMHA's initial rent reasonableness determination is unreasonable and unfair. Paying retroactively is not prohibited in the regulations. However, whatever the policy is, it should be documented in the Plan.

**Comment b:** Mr. Pope, Ms. Curtis, Mr. Davis and Ms. Donald agreed.

**CMHA response:** If the contract is for a lease-in-place tenant, the contract is made retroactive to the inspection pass date. However, for other contracts, Section 8 does not agree with this recommendation. There can be no contract if the rent has not been agreed upon. Section 8 does not believe it is advisable to pay retroactive rent without a reason. This is a way to monitor expenses in a fully utilized program. Retroactive payments could exceed \$225,000, which the Section 8 budget cannot support at this time of budgetary restrictions and full utilization. Another concern is that Section 8 would have difficulty in determining whether the family is actually residing in the unit. This is not a policy, it is a work practice. All parties are educated as to the process. It is not necessary to document a work process in the Admin Plan.

## **9. Housing Quality Standards and Inspections**

**Comment a:** Referring to the additional Housing Quality Standards (HQS) of screens, storm windows and storm doors in Chapter 10, Ms. Pennington commented that existing units would be "grandfathered in". Ms. Curtis commented that HUD approved CMHA's request for additional HQS standards effective September 2<sup>nd</sup>.

**Comment b:** Mr. Pope disagreed with the recommendation. This policy will be difficult for landlords to meet now that damage claims have been eliminated from the Section 8 Program. Screens and storm doors are a frequent tenant-caused damage. If tenants cannot pay for the damage, the result will be their eviction from the subsidized unit.

**Comment c:** Mr. Iskin commented that CMHA should assess, prior to adopting the new requirements, the number of units which would not meet the proposed requirements and the number of units for which the owner is unlikely to make the improvements and will therefore withdraw the unit from the Section 8 Program. If a significant number of units would be withdrawn, CMHA should rescind the proposal. In lieu of the proposed requirements, CMHA should consider a policy requiring compliance with applicable local codes.

**Comment d:** Mr. Davis recommended Section 8 require compliance with local codes. The housing inventory would then be studied over the coming year to determine whether units were meeting local codes.

**CMHA response:** It is recommended that the policy change go forward. It is suggested that landlords purchase high quality, sturdy screens and storm doors. CMHA's public housing program has procured such high quality merchandise.

## **10. Access to Unit**

**Comment a:** Regarding Section 8's proposed change that both landlords and tenants be made responsible for ensuring the inspector gain access to the unit, Mr. Iskin stated that Section 8 should not assume the unit was not repaired because the inspector cannot gain access. In addition, the requirement for the tenant to permit CMHA access to the unit is a family obligation not an HQS obligation. It is also not an HQS requirement for the landlord. It is a landlord obligation under the HAP contract.

**Comment b:** Mr. Pope commented that the responsibility to gain access to the unit should be the tenant's not the owner's. He commented that tenants sometimes change the locks or have dogs.

**CMHA response:** Section 8 is burdened with a high number of "not-at-home" inspections. This creates serious scheduling and budgetary problems. It is recommended that the landlord and tenant coordinate the inspection time to ensure at least one of them, or any other responsible adult over the age of 18, be present to allow the inspector access to the unit. It is recommended that the landlord pursue tenants in court who violate the lease by changing locks or having dogs when not permitted by the lease.

## **11. Repair Extension Policy**

**Comment:** Mr. Pope commented on Section 8's proposal to tighten the repair extension policy. It is not feasible for a landlord to repair 50 – 100 units within a relatively short, fixed amount of time. Tenants are frequently not at home when the repairman arrives.

**CMHA response:** Section 8 provides adequate notice. However, Section 8 would also be willing to review requests on a case-by case basis.

## **12. Inspection Appeal Process**

**Comment:** Concerning the existing provision that owners or families may appeal the inspector's determination responsibility, Mr. Iskin suggested that the provisions be supplemented as follows: If neither the family nor owner requests a review of the inspector's decision, the decision should be made final. This enables the parties to proceed with making other related decisions without concern that the original determination will be changed. Also, if either the family or owner makes a timely request for review of the inspector's decision, the other party should be afforded a reasonable opportunity to present arguments during the review.

**CMHA response:** Agree.

### **13. Abatements**

**Comment a:** Ms. Curtis commented that abated funds should not be returned to the landlord.

*CMHA response:* Agree.

**Comment b:** Mr. Pope commented that Section 8 should not abate for a minor item.

*CMHA response:* HQS is a minimum standard. Landlords should comply.

### **14. Payment Standards for the Voucher Program**

**Comment:** Ms. Curtis commented that on Page 11-4, last paragraph, wording should be clarified to state: “With HUD Field Office approval, the PHA may approve a higher payment standard if required as a reasonable accommodation for a family that includes a person with disabilities”.

*CMHA response:* Agree.

**Comment:** On page 11-5, under “Changes in Payment Standards” Ms. Curtis recommended adding a sentence stating: “The Payment Standard effective date will generally be 90-120 days after the publication of the Fair Market Rents due to re-exams in process”.

*CMHA response:* The Payment Standard effective date will generally be 120 days after publication of the Fair Market Rents (FMR).

### **15. Interim Re-Exams**

**Comment a:** In Chapter 12, Mr. Iskin commented that Section 8 should retain its current policy of a change in income being effective on the first of the next month after it is reported. Clients have no control over when the housing authority receives its third party verification. He suggested not putting the change into the computer system until verified, but making changes retroactive at that time. The proposed change sets the family up for failure. This is a critical item that would cause enormous harm to the tenant. The policy would result in the tenant’s rent being based upon prior higher income. This will result in nonpayment of rent, eviction from the unit, and subsequent termination from the Section 8 Program. CMHA’s current policy is permissible and reasonable and should be retained.

**Comment b:** Ms. Curtis agreed with Mr. Iskin and stated the information should not be entered into the computer until it is verified.

**Comment c:** Mr. Davis also agreed.

**CMHA response:** For interim re-exams, Section 8 withdraws the proposed change and will make the effective date retroactive to the first of the next month after the change is reported.

**Comment d:** Ms. Curtis commented that on page 12-3, there is no need to address the rent change effective date based on whether the change is an increase or decrease. She proposed deleting the section called “Tenant Rent Decreases” and renaming the Rent Increase section “Tenant Rent Changes”. She continued that the effective date only needs to be addressed when the re-exam is an interim.

**CMHA response:** Agree.

**Comment e:** At the top of 12-4, top of page, the sentence should read: “...housing assistance payment. Family unit size is adjusted, if applicable, at the first regular re-exam thereafter”.

**CMHA response:** Agree.

**Comment f:** On page 12-4, under “Decreases in income” delete the last proposed sentence and add: “Changes in income or deductions that result in a rent decrease will be effective the first of the month following the month in which the change occurred”.

**CMHA response:** Agree.

**Comment g:** On page 12-7 under “Procedures when the Change is Not Processed by the PHA in a Timely Manner”, Ms. Curtis recommended deleting the current wording and adding, “The PHA will not delay the processing more than is required by the verification process described in Chapter 7”.

**CMHA response:** Agree.

## **16. Restrictions on Moves**

**Comment a:** On page 13-1, Mr. Iskin commented that he thought Section 8 should allow mutual rescissions of lease during the first year of occupancy.

**Comment b:** Mr. Davis agreed.

**CMHA response:** Section 8 does not agree. The regulations state that initial lease term must be for at least one year unless a shorter term would improve housing opportunities or a shorter term is the prevailing market practice. This is not the case in Cuyahoga County, Ohio where the supply of units is adequate and the prevailing market practice is one year. Allowing tenants to move within the initial year would create an administrative burden in inspecting additional units, processing new rent determinations and creating new contracts. Families and owners should fulfill the commitment made in the lease unless there is an extraordinary circumstance, such as the need for a reasonable accommodation.

## 17. Denial or Termination of Assistance

**Comment a:** On page 15-2, Mr. Iskin suggested that Section 8 define “serious violation of the lease”. He suggested it be defined as follows: “The commission of a crime against person or property (or any other act) that directly and significantly affects the health or safety of other residents, or that directly and significantly injures the property of another resident or that directly and significantly injures the premises.” He said nonpayment of rent does not adversely affect, directly or significantly, the other residents of the premises. When nonpayment of rent occurs, the lease and state law afford the landlord effective and efficient remedies for protecting the landlord’s interests (e.g. summary eviction procedure)...debts arise only if and when a landlord fails to commence timely an eviction action for nonpayment. However, if CMHA elects to include nonpayment of rent in its definition of “serious violation of the lease”, it should be defined and limited to a “large unpaid rent debt”.

**Comment b:** Mr. Davis agreed that a definition of “serious violation of the lease” is needed.

**CMHA response:** Section 8 does not agree. Nonpayment of rent is a serious lease violation. Even when timely filed, an eviction can result in a large unpaid rental debt, especially if the tenant’s portion is particularly high and there are delays with the court. If noncompliance with the lease has escalated to the point that a landlord must file an eviction, Section 8 considers this to be a serious violation of the lease. Therefore, it is our work practice to proceed with a proposal for termination on every for-cause eviction. 24 CFR 982.552 (b) (2) states that the PHA *must* terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease.

**Comment c:** Regarding Section 8’s proposal to change the hearing request times in Chapter 15 from 30 days to 15 days, Mr. Iskin disagreed. He said the proposed change should be rescinded for at least three reasons: 1) The current 30 day time period provides the family with reasonable time in which to assess CMHA’s proposed action, to secure legal assistance and to request a hearing. 2) There is no compelling reason to reduce the 30-day time period. 3) A 15-day time period is inadequate, especially if the family is attempting to secure legal assistance. He suggested that wording be added allowing a continuance in cases where needed for good cause.

**Comment d:** Mr. Davis agreed that the timeframe should not be shortened.

**Comment e:** Ms. Curtis commented that the 15-day timeframe is common among housing authorities.

**CMHA response:** The 15-day timeframe should be retained since it enables Section 8 to complete proposed for termination actions more timely, regardless of whether the client will remain on the program or be terminated. However, a continuance may be granted where needed for good cause. Good cause includes time needed for scheduling and preparing for the hearing, if deemed warranted by the Manager or Compliance Officer, for documented medical and personal family emergencies, and as a reasonable accommodation. The time period granted for the continuance would be dependent upon the nature of the request.

**Comment f:** On page 15-11, first line, Ms. Curtis requested clarification.

**CMHA response:** The number 15 should be substituted for the number 30.

**Comment g:** Mr. Iskin commented that, with regard to the denial of moving papers, he would have additional comments after assessing this proposal.

## **18. Zero-Assistance for Six Months**

**Comment a:** Mr. Iskin commented on Section 8's policies concerning tenants whose HAP payment is zero due to the tenant's portion of rent reaching or exceeding the HAP payment. He noted that the termination of the HAP contract at six months of zero HAP causes a termination of the lease, but does not automatically terminate the family's Section 8 participation. He felt that the wording in the current Admin Plan is misleading and/or erroneous. It fails to establish advance notice to the family. In addition, he feels the proposed revisions do not correct the deficiencies.

He feels the first sentence of Section E is misleading since the HAP contract, with all its provisions, remains in effect regardless of whether the HAP payment is zero. The second clause of the sentence is also misleading since whether the tenant remains in the unit after the six months has expired is a matter solely between the tenant and landlord. He suggests a sentence stating that during the specified six-month period, both the HAP contract and Section 8 voucher lease remain in effect and the family continues to be a participant in the Section 8 program.

**Comment b:** Mr. Davis agreed that the wording needs to be clarified throughout.

**CMHA response:** Agree.

**Comment c:** Mr. Iskin finds the third sentence of Section E also erroneous since it states the family's participation in the Section 8 program will be terminated if the family still resides in the unit after 180 days. The statement is erroneous because the family may have valid moving papers and because it does not take into account a timely change in circumstances.

**CMHA response:** Agreed. The wording will be clarified to state that the family will be withdrawn if there has been no change in circumstance causing HAP payments to resume within the 180-day timeframe. Moving papers will be issued at the beginning of the 5<sup>th</sup> month, so that the 60-day timeframe of the voucher will expire at the same time as the 180 days.

**Comment d:** The 5<sup>th</sup> sentence of Section E is erroneous because it suggests the family is required to complete its move before the end of the six-month period.

**CMHA response:** Disagree. The family will be withdrawn if HAP payments have not resumed on its behalf by the end of the 180-day timeframe.

**Comment e:** The Admin Plan fails to require any advance notice of the six-month rule. He commented that the Plan should provide advance written notice including: 1) A description of the six-month rule; 2) The family's status relative to the six-month rule; 3) The options available

to the family to continue participation in the Section 8 voucher Program; and 4) The family's opportunity to meet with CMHA to discuss these options. He recommends the Plan state that CMHA shall serve this notice upon the expiration of the fourth month of the six-month period. He included a sample notice with his written comments.

Mr. Iskin concluded by saying that CMHA's proposed revisions to this section of the Admin Plan were good, but only if, in addition, the changes he recommended above were included.

**CMHA Response:** CMHA will continue to provide written notice of the six-month rule, and will formalize the process by including language in the Admin Plan. Mr. Iskin's sample notice will be reviewed to determine whether it, or a revised version of it, would be suitable.

## **19. Telephone Hearings**

**Comment:** On pages 19-3 to 19-6, Mr. Iskin recommended that informal hearings be offered via telephone as are informal reviews.

**CMHA Response:** Disagree. Clients cannot properly represent themselves via telephone, because they will not have an opportunity to review evidence and question witnesses. Section 8 agrees to provide telephone hearings only when requested as a reasonable accommodation.

## **20. Security Deposit Assistance Program**

**Comment:** Mr. Iskin commented that the Security Deposit Assistance Program should be documented in the Admin Plan. It should be specified in the Plan that the tenant should receive written notice and can receive a hearing if the landlord will keep the deposit for alleged damages or unpaid rent. Further, he stated that if the scope of the hearing includes the matter of the right of the landlord to retain assistance, a CMHA employee cannot be an impartial hearing officer. He believes this to be a matter of due process and HUD regulations.

**CMHA response:** Since the security deposit is a matter between the landlord and tenant, and since Section 8 would not have a way of knowing whether there were damages or rent was due, tenants seeking security deposit refunds should seek a court judgment. Since an informal hearing will not be granted in such matters, it is not necessary to document the process in the Admin Plan.

## **21. Homeownership Program**

**Comment a:** Regarding the Homeownership Program discussed in Chapter 20, Mr. Iskin commented that he is opposed to eliminating the 150-person limit currently established in the plan. He cites three reasons: First, since Homeownership is a new program, he believes CMHA will be making adjustments to the program in the coming year. These adjustments will be easier to make with a smaller number of participants. Second, The number of program applicants meeting eligibility requirements will likely not exceed 150. Finally, he wishes to avoid diverting

an unreasonable amount of subsidy from extremely low-income families who need it. Housing subsidy should be allocated to people with the lowest incomes, not higher income persons able to participate in Homeownership.

**Comment b:** Mr. Davis recommended that that the number of units allocated toward the Homeownership Program be limited to 100.

**Comment c.** Ms. Lynn Hildebrand (Services for Independent Living) requested that the cap for the homeownership program be retained at 150 vouchers.

**CMHA response:** The cap of 150 persons should be eliminated. Persons who are able to purchase a home should be able to purchase rather than having to continue as a renter. This is permitted by the regulations. In addition, due to the credit and other financial requirements of the program, it is highly unlikely that the Homeownership Program will impact service to low income families in a significant way. Homeownership provides a self-sufficiency goal for low-income families to work toward.

### ***PHA Plan Amendment***

CMHA conducted a Public Hearing on April 26, 2004 to consider an amendment to the 2004 Public Housing Agency Plan that was approved by HUD on December 28, 2003. In order to help CMHA control costs and thus preserve the greatest number of units in the Housing Choice Voucher Program (Section 8) due to uncertain funding levels from HUD, CMHA proposed the following amendment to the FY2004 Annual Plan, which was subsequently passed at the May 5 Board Meeting. CMHA amended the HCVP payment standard:

PHA Rent Determination Policies for Section 8 Tenant-Based Assistance concerning Payment Standards (section 4B1) and section 11A of the Section 8 Administrative Plan – to revise the payment standard used to calculate the housing assistance payment for a family from 110% of the current HUD-established Fair Market Rent (FMR) to 100% of the FMR.

### **Comments:**

Peter Iskin, Attorney from the Legal Aid Society of Cleveland presented written and verbal comments. The written comments are attached and the verbal comments are summarized as follows:

Mr. Iskin feels it is premature to adopt changes to the Housing Choice Voucher Program (HCVP) Payment Standard (PS). He believes the proposed change would adversely affect participants. He also states the relevant Fair Market Rent (FMR) may be reduced significantly this year and the 2005 voucher budget is unknown at this time; therefore, a change may not be necessary.

According to Mr. Iskin, there would be four adverse affects to HCVP participants: 1. It would reduce the number of rental units available. 2. It would increase the number of voucher families required to pay more than 30% of income for rent. At this level, HUD might require CMHA to increase its PS. 3. The proposed reduction would adversely affect CMHA's deconcentration efforts. 4. The reduction in number of available units would impede the ability of families to find units timely and would therefore result in their withdrawal from the program.

Jimmie Pope, an HCVP landlord who owns Nuban Management, stated there should be a more detailed study of the proposal before proceeding. He does not believe the changes being proposed in Washington will occur. Mr. Pope continued that low rents represent low standards. The low rents will force families back into lower quality housing instead of a better product. He believes costs should be cut from within first. He stated that the proposal would affect the amount of money landlords have to invest in their units as well as the County tax base.

***CMHA response:***

After careful study, CMHA staff believes the proposed change should be implemented for a number of reasons. One, actual changes to the PS occur over the course of about 18 months so cost containment strategies must be staged well in advance in order to effect a change. Families are not affected until their second annual re-exam as long as they remain in their current unit. In addition, the majority of families housed under the HCVP are under contracts with rents at or below the 100% payment standard.

Secondly, the HUD published PIH Notice 2004-7, dated 4-22-04 advises Housing Authorities "concerned about increases in its per unit costs (PUC),"to consider the following administrative steps" A. Reduce the payment standard amounts for the program."

Thirdly, recent rent comparison data collection, support our assessment that the majority of our jurisdiction has comparable rents at 100% of the FMR or less. Further the current ample supply of rental units should not impede the ability of participants in finding an affordable rental unit at this time.

HCVP management staff will analyze the impact of these revisions regularly in order to monitor the affect of the revised PS on participant's ability to find units, and affordability.

If the budget changes proposed in Washington are not implemented, as suggested by the commenters, CMHA can re-evaluate the PS and ask the Board to consider an alternate plan at a future date. Secondly, if and when HUD announces revisions to the FMR and the percentile by which they are set, we can reconsider our payment standards at that time and return to the Board of Commissioners with a recommendation. At the present time, staff believes that the revisions are necessary to contain costs and preserve assistance for the greatest number of families.