



PUBLIC NOTICE

On May 9, 2016 CMHA released its Significant Amendment to the 2016 Annual Plan for the 45-day public review and comment period.

The Significant Amendment describes CMHA's decision to convert its public housing inventory to project-based rental assistance through the U.S. Department of Housing and Urban Development (HUD) Rental Assistance Demonstration (RAD), and explains the implications for CMHA's annual Capital Fund grants received from HUD. The proposed amendment is incorporated in its entirety into the 2015-2016 PHA Annual and 5-Year Plan through an attachment entitled, "Attachment R – Rental Assistance Demonstration."

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing CMHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, CMHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that CMHA may also borrow funds to address their capital needs. Since CMHA plans to convert its entire portfolio of public housing developments, at the end of the conversion process CMHA will no longer receive Capital Fund grants from HUD. CMHA will also be contributing Replacement Housing Factor (RHF) Funds in the amount of \$21 million towards the conversion of its portfolio of Public Housing under the Demonstration.

A public hearing will be held on June 23, 2016 at 1:00 p.m. in CMHA's Board Room located at 880 E. 11th Ave., Columbus, Ohio 43211. The Significant Amendment can be viewed on CMHA's website, www.cmhanet.com. Written comments may be mailed to CMHA's main office, Attn: RAD Significant Amendment, 880 E. 11th Ave., Columbus, Ohio 43211. Written comments must be received by close of business June 23, 2016.

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Attachment R – Rental Assistance Demonstration (RAD)

CMHA is amending its Annual PHA plan because we are implementing a strategy to convert all of our public housing units to project-based rental assistance through the Rental Assistance Demonstration (RAD). CMHA has received Commitments to enter into a Housing Assistance Payment contract (CHAPs) covering four properties: Sawyer Manor, Trevitt Heights, Jenkins Terrace, and Worley Terrace, under the guidelines of PIH Notice 2012-32, REV-1 (the RAD Notice) and any successor Notices. We have also submitted a Portfolio Application on February 18, 2016, for the conversion of our remaining 12 projects.

The following information is required to be included in a Significant Amendment by the RAD Notice:

1. Description of units to be converted.

The RAD applications for Sawyer Manor, Trevitt Heights, Jenkins Terrace and Worley Terrace are all appended to this Attachment.

The RAD portfolio application we submitted earlier this year can be accessed at the following link: <https://www.dropbox.com/sh/wylx81bi222vrft/AAAT9siH-MEwVLTdckiXaDh4a?dl=0>.

2. Change in the number of units proposed as part of the conversion.

No changes are proposed. See RAD applications.

3. Changes in the policies that govern eligibility, admission, selection, and occupancy of units at the projects after they have been converted.

Upon conversion to PBRA, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.7 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment.

4. Transfer of assistance.

No transfer of assistance is proposed. See attached applications.

5. Indication of whether PHA is currently under a voluntary compliance agreement, and an assurance that compliance will not be negatively impacted by conversion activities.

On or about October 29, 2015, CMHA agreed to a voluntary compliance agreement (VCA) with HUD regarding its language access plan. Under the VCA, CMHA agreed to the following:

- Display signs in customer service areas of the language services that are available to clients.
- Translate a specific set of vital documents into Spanish and Somali.
- Update the telephone system's auto attendant for prompts in Spanish and Somali.
- Make oral interpretation services and "I speak" cards available to staff
- Display Fair Housing poster in Spanish and Somali in all rental office locations
- Conduct two (2) hours of training for covered employees on the duties of the VCA agreement.

- Modify the ACOP and Administrative Plan to reflect CMHA's position on LEP services.

In no way will the RAD conversions outlined above negatively impact CMHA's compliance with this VCA.

6. A statement certifying that the RAD conversion complies with all applicable site selection and neighborhood review standards and that all appropriate procedures have been followed.

The projects complies with the Site selection requirements set forth at Appendix III of PIH Notice 2012-32 Revision 1], the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

7. All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications.

CMHA has submitted all other required information and certifications. We met with our Jurisdiction Wide Resident Council and discussed the RAD program as part of our meeting regarding our annual plan as RAD has been part of our last three annual plans. Moreover, we held two meetings with our JWRC to specifically discuss a portfolio application under the RAD program. Those documents are attached to our portfolio application.

8. For MTWs utilizing MTW Fungibility as defined in Section 1.9.E and Section 1.6 or 1.7, as applicable, a statement explaining how the MTW will be able to maintain continued service level requirements.

CMHA is not a MTW agency.

[MAY 9, 2016 UPDATE]

9. Implications for Capital Funds (24 CFR Part 903)

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing CMHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, CMHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that CMHA may also borrow funds to address their capital needs. Since CMHA plans to convert its entire portfolio of public housing developments, at the end of the conversion process CMHA will no longer receive Capital Fund grants from HUD. CMHA will also be contributing Replacement Housing Factor (RHF) Funds in the amount of \$21 million towards the conversion of its portfolio of Public Housing under the Demonstration. CMHA provided for a 45-day public comment period on these changes by public notice on May 9, 2016.

The tables below show current Capital Fund and RHF grants as well as projected grant amount as CMHA converts its portfolio through RAD.

1. Current RHF & DDTF Balances

Grant Number	RHF		DDTF	Obligation Date
	1st Increment	2nd Increment		
OH16R011501-09	\$377,062.00			10/29/2016
OH16R001501-10	\$805,514.00			10/29/2017
OH16R001501-11	\$1,347,670.00			10/29/2017
OH16R001501-12	\$1,397,747.00			10/29/2017
OH16R011501-13	\$1,317,659.00			10/29/2017
OH16R001502-13		\$662,047.00		9/8/2015
OH16R001501-14	\$1,431,870.00			5/12/2016
OH16R001502-14		\$728,189.00		5/12/2016
OH16R001501-15	\$1,236,141.00			TBD
OH16R001502-15		\$737,106.00		TBD
OH12R001501-16	\$432,505.00			TBD
OH12R001502-16		\$441,031.00		TBD
OH16P001501-14			\$285,330.47	
OH16P001501-15			\$660,313.71	
OH12P001501-16			\$2,235,670.45	
<i>Subtotals</i>	<i>\$8,346,168.00</i>	<i>\$2,568,373.00</i>	<i>\$3,181,314.63</i>	
TOTAL*	\$14,095,855.63			

*Note: \$3,400,000 of current RHF/DDTF grant fund will be used as part of CMHA's redevelopment of the Poindexter Village community under our Choice Neighborhoods Implementation grant.

2. Anticipated Future RHF & DDTF Grants

Property	2017	2018	2019	2020	2021
Poindexter	\$449,300	\$449,300	\$449,300	\$449,300	-
Lincoln Park	425,136	425,136	425,136	425,136	425,136
Riverside Homes	166,490	166,490	-	-	-
Rehab HSG/ Scattered Sites	101,863	86,429	86,429	24,694	
Sunshine Annex	162,080	162,080	162,080	-	-
Marion Square	297,214	297,214	297,214	7,369	7,369
Maplewood Heights (Elderly)	92,188	92,188	92,188	92,188	-
Bollinger Tower	129,950	129,950	129,950	129,950	-
Reeb-Hosack	40,842	40,842	40,842	40,842	-
Canonby Court	73,880	73,880	73,880	73,880	-
Trevitt Heights II	3,360	3,360	3,360	3,360	-
Swayer Manor	482,929	482,929	482,929	482,929	-
Worley Terrace I	-	-	-	-	-
Sunshine Terrace*	1,089,185	-	-	-	-
<i>Subtotals by year</i>	<i>3,514,417</i>	<i>2,409,798</i>	<i>2,243,308</i>	<i>1,729,648</i>	<i>432,505</i>
TOTAL FUTURE RHF/DDDTF	\$10,329,676				

*Note: Sunshine Terrace will receive funding over five years, but at the time of this Amendment HUD did not provide year-by-year projections for that distribution, only the total projected amount.