

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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DRAFT OF SIGNIFICANT AMENDMENT TO THE 2018 ANNUAL PLAN

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

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

Definitions.

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

A.	PHA Information.
A.1	<p> PHA Name: <u>Lorain Metropolitan Housing Authority</u> PHA Code: <u>OH012</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2018</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1438</u> Number of Housing Choice Vouchers (HCVs) <u>3091</u> Total Combined Units/Vouchers <u>4529</u> PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> LMHA posts the Annual PHA plan, the Five Year Plan, and the 5-Year Action Plan elements on its website at www.lmha.org. Plans are also available at the LMHA Main Office, 1600 Kansas Avenue, Lorain, OH 44052 and at all administrative and property management offices: <ul style="list-style-type: none"> ○ LMHA Procurement Office 1604 Kansas Avenue, Lorain ○ Leavitt Homes 2153 Lorain Drive, Lorain ○ Kennedy Plaza 1730 Broadway, Lorain ○ Lakeview Plaza 310 W. 7th Street, Lorain ○ Southside Gardens 3010 Vine Ave., Lorain ○ Albright Terrace 129 Milan Ave., Amherst ○ John Frederick Oberlin Homes 138 South Main St., Oberlin ○ Wilkes Villa 104 Loudon Court, Elyria ○ Riverview Plaza 310 East Ave., Elyria ○ Harr Plaza 15 Chestnut Street, Elyria ○ International Plaza 1825 Homewood Drive, Lorain </p> <p>LMHA provides the Plans to each of its resident councils.</p> <p>To obtain additional information on the policies contained in the Annual Plan, visit http://www.lmha.org/about-lmha/ and select either "Annual Reports and Audits" or "LMHA Policies". For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750.</p>

	<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)				
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program
					PH HCV
	Lead PHA:				
B.	Annual Plan Elements				
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>As it applies to the Significant Amendment, the following elements have been revised:</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(SEE PAGE 18 OF 44 FOR COMPLETE TEXT OF THE PROPOSED CHANGES)</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Each of the PHA Plan Elements listed in B.1(a) above is addressed in the following pages.</p>				

B.1b

Statement of Housing Needs and Strategy for Addressing Housing Needs

Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a 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. (24 CFR §903.7(a)(2)(ii))

At the end of calendar year 2017, more than 97% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 93% of public housing residents, 99% of multifamily residents, and 77% of participants in HCVP are ELI. For comparison, approximately 15% of families in Lorain County are ELI¹. More than 19% of the public housing households (275) have zero annual income. More than 550 public housing adults must perform Community Service. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County.

Approximately 40% of LMHA applicants for PH, Multifamily, and HCVP are elderly families or families with disabilities. In public housing, if an accessible unit is vacant, that unit will be offered to the first family that is in need of the features of the unit, even if the family is not at the top of the waiting list. If an applicant or current family does not need the accessibility, LMHA contacts agencies who serve persons with disabilities to advise them of the availability of such units.

Though none of LMHA's public housing developments are designated for persons who are elderly or have disabilities, LMHA manages two Multifamily Project-Based Section 8 properties (Harr and International Plazas) with 100 units each designated for elderly or persons with disabilities (36% are elderly, 90% have a disability). In LMHA's public housing, 37% of the households include an individual with a disability, and 12% of the heads of household are elderly.

LMHA processes between 400-500 requests for Reasonable Accommodations annually for all housing programs.

LMHA administers 175 vouchers for persons who are Non-Elderly Disabled (NED) and 117 Veterans Affairs Supportive Housing (VASH) vouchers.

LMHA responds to requests for reasonable accommodations for modifications to units or transfers to appropriate units to ensure that the household member has full access to live in the apartment without limitations.

During projects involving substantial renovations, units will be constructed/renovated utilizing principles of universal design and visitability. LMHA has a goal of establishing at least 72 mobility accessible public housing units. Currently there are 28. There are many units that are not fully mobility accessible but are visitable, having been renovated following principles of Universal Design.

LMHA has exceeded its Section 504 goal of having 2%, or 29, units for persons with sensory impairments. LMHA now has 396 (or 28%) of its public housing units accessible for persons with sensory (hearing) impairments. Additional units are made accessible for sensory impairments upon request.

In the past few years, LMHA has become aware of a greater need for accessible units with 3, 4 or 5 bedrooms. To address this need, LMHA's Master Plans for Wilkes Villa and Southside Gardens include designs for approximately 10% of the units to be fully mobility accessible and for all units to be visitable, i.e., constructed utilizing principles of universal design. The prototype building at Southside Gardens, which was leased up in May 2017, consists of 3 units: 3-bedroom accessible flat; 2-bedroom townhouse; 5-bedroom townhouse with the first floor being accessible.

¹Source for Lorain County statistics: http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

B.1b	<p>The City of Elyria's Consolidated Plan for 2015-2019 is available online at http://www.cityofelyria.org/wp-content/uploads/2016/03/2015-2019-Consolidated-Plan.pdf. (Refer specifically to pages 25-48 for housing need analyses.)</p> <p>The Plan draft discusses the primary housing problems: Lacks complete kitchen facilities; lacks complete plumbing facilities; more than one person per room; cost burden greater than 30%. On page 31, the City discusses the most common housing problems:</p> <p>The largest housing problem in the City of Elyria is housing affordability. According to the 2007-2011 ACS data, 39.47% of all renter households are cost overburdened by 30% or more, and 16.23% of all owner households are cost overburdened by 30% or more. In addition, 22.18% of all renter households are cost overburdened by 50% or more, and 7.61% of all owner households are cost overburdened by 50% or more.</p> <p>In consultations, interviews and surveys, the lack of affordable accessible housing for the disabled is the largest unmet housing need and problem. Most of the affordable housing units are located in the central and southern portions of the City. It contains the oldest housing stock which is multi-stories in height and not easily modified for the needs of the disabled.</p> <p>Another housing problem is the lack of permanent housing for the homeless. Once again this is an affordability issue.</p> <p>The elderly and disabled populations are the most affected by the high cost of housing in the City of Elyria. The elderly and disabled are on fixed or limited incomes. The lack of affordable housing that is decent, safe, and sound, forces the elderly and disabled into housing that is below code standards.</p> <p>The provision of affordable housing is LMHA's mission and specialty. Creation of quality, affordable accessible housing by LMHA has increased in the past 10 years. LMHA's long range plans for redevelopment include almost all units being visitable (i.e., constructed with universal design principles) and creation of additional accessible housing. LMHA's public housing properties are general population and not specifically designated for the elderly or disabled. Yet, universally designed properties are intended to meet the needs of the general population, the elderly, and persons with disabilities. Of LMHA's applicants for housing, 10% of the PH families and 11% of the HCVP families are elderly; 20% of PH and 19% of HCVP families are families with disabilities. In Lorain County, 13% of PH families and 16% of HCVP families housed in Lorain county are elderly; 35% of PH and 43% of HCVP households are families with disabilities. As LMHA redevelops or substantially renovates properties, more accessible and universally designed units will be available to serve the needs of low-income persons described in Elyria's Plan.</p> <p>On page 42, Elyria's Plan discusses disproportionate needs by race and ethnicity:</p> <p>According to the 2007-2011 American Community Survey, the racial composition of households in the City of Elyria was 84.10% White; 12.89% African American/Black; 0.15% Asian; 0.68% Other races; 1.71% two or more races. The Hispanic or Latino population was 3.43%.</p> <p>There are three (3) disproportionately impacted groups in terms of having a housing problem, a severe housing problem, or a housing cost burden.</p> <ol style="list-style-type: none"> 1. There is one disproportionately impacted group in terms of having a housing problem: the 0% - 30% AMI Black/African American Group 2. There is one disproportionately impacted group in terms of having a severe housing problem: the 0% - 30% AMI Black/African American Group 3. There is one disproportionately impacted group in terms of having a housing cost burden: the greater than 50% Black/African American Group <p>In Lorain County, 37% of PH families and 52% of HCVP applicant families are self-declared as Black/African American, demonstrating that LMHA's housing programs are meeting the needs of the disproportionately impacted groups described by the City of Elyria. For families housed in Lorain County, the rates are 39% of HCVP families and 42% of PH families. In other words, while 13% of Elyria's population is Black/African American, approximately 40% of LMHA's PH and HCVP families are Black/African American.</p> <p>The City of Lorain's Consolidated Plan 2015-2019 includes housing needs analyses on pages 24-58.</p> <p>On page 38, Lorain's Plan discusses the most common housing problems:</p> <p>[T]he most common housing problem in the City of Lorain is cost burden, for both renter and owner households. Substandard (lacking complete plumbing or kitchen facilities) and overcrowded housing (1.01-1.5 people per room) are also housing problems; however, these problems affect more renters than owners. Severely overcrowded housing (more than 1.5 people per room) is also problem, but not as significant when compared to the prevalence of other housing problems.</p> <p>Households earning less than 80% AMI are experiencing higher rates of cost burden than those households with higher incomes. More renters are experiencing cost burden than owners, especially those earning less than 30% AMI. Comparisons of cost burden by type of household show that while large related renter and owner households are less affected by cost burden, small related, elderly and other household types are more affected. Substandard and overcrowded housing is more common among renters and owners earning less than 50% AMI. Single family households are more affected by crowding than households with multiple, unrelated members or other non-family households.</p> <p>On pages 55-57, the Plan lists housing needs not previously identified:</p> <p>Based on input and data received through an extensive citizen participation process, the greatest housing needs are:</p> <ul style="list-style-type: none"> • Housing demolition (e.g. removal of abandoned and blighted housing stock) • New, quality affordable housing that is attainable to those with low income and located proximate to employment and essential amenities • Housing rehabilitation (e.g. housing rehabilitation and maintenance assistance, energy efficiency and accessibility retrofits, etc.) • Improved coordination with housing providers and the Lorain Metropolitan Housing Authority (LMHA) on projects and programs that benefit low income residents • Self-sufficiency training and case management for all populations (e.g. pathways to homeownership, responsible homeowner/renter/landlord skills, etc.) <p>On page 57, Lorain's Plan summarizes:</p> <p>The areas identified as having high concentrations of minority populations also have a high percentage of low and moderate income households. The data seem to indicate a correlation between concentrations of low income and minority race or ethnicity. As indicated in the previous sections, a person's race, income, and disability status are strong indicators for needing housing assistance through various public housing program types.</p> <p>Although a disproportionate need is shown throughout for minority low income households, the data provided show that White, Black/African American, and Hispanic groups have a high demand for supportive housing of different types. Among these groups, tenant based housing is the most common type of assistance. Families identified as "Families with Disabilities" have a high need for tenant based housing, while at the same time being in need of improved accessibility within existing housing.</p>
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B.1b

LMHA's mission and specialty is the provision of safe, decent, affordable housing for persons of low-income in Lorain County. Lorain's primary housing problem is affordability, and LMHA's housing programs are tailored to that problem for general populations, elderly persons, and persons with disabilities. None of LMHA's owned-and-managed properties are substandard, as defined by HUD. LMHA is working towards implementing its Master Plans to redevelop Southside Gardens (Lorain) and Wilkes Villa (Elyria) which, upon completion, would replace functionally obsolete structures with new, quality affordable housing that is attainable to those with low income. LMHA has improved its coordination and has frequent communications with the City of Lorain in regards to proposed projects and LMHA policies. LMHA provides self sufficiency programming for its public housing residents and HCVP participants.

Housing Needs of Housing Choice Voucher Program (HCVP) APPLICANTS ³			Statistics for Lorain County Households ^{1,2}
NOTE: LMHA is <i>not</i> currently accepting HCVP applications.	# of Families	% of Total Families	
Totals as of December 28, 2017	1430	100%	117,298
Extremely low income (<=30% AMI)	1377	96.3%	15%
Very low income (>30% but <=50% AMI)	45	3.2%	7%
Low Income (>50% but <80% AMI)	6	0.5%	13%
Families with children ⁴	1136	79.4%	31%
Elderly families	6	10.8%	12%
Families with Disabilities	267	18.7%	-
Hispanic	305	21.3%	9%
Non-Hispanic	1086	75.9%	91%
White	488	34.1%	85.3%
Black/African American	741	51.8%	8.4%
American Indian/Alaska Native	12	0.8%	0.3%
Asian	6	0.4%	1.0%
Native Hawaiian/other Pacific Islander	16	1.1%	0.0%
Multi-racial	54	3.8%	3.6%
Declined to report	113	7.9%	1.4%

Housing Needs of PUBLIC HOUSING (PH) APPLICANTS ³			Statistics for Lorain County Households ^{1,2}
NOTE: LMHA is <i>currently</i> accepting PH applications.	# of Families	% of Total Families	
Totals as of December 28, 2017	1893	100%	117,298
Extremely low income (<=30% AMI)	1853	97.9%	15%
Very low income (>30% but <=50% AMI)	36	1.9%	7%
Low Income (>50% but <80% AMI)	4	0.2%	13%
Families with children ⁴	1007	53.2%	31%
Elderly families	190	10.0%	12%
Families with Disabilities	381	20.1%	-
Hispanic	556	29.4%	9%
Non-Hispanic	1299	68.6%	91%
White	867	45.8%	85.3%
Black/African American	708	37.4%	8.4%
American Indian/Alaska Native	19	1.0%	0.3%
Asian	3	0.2%	1.0%
Native Hawaiian/other Pacific Islander	20	1.1%	0.0%
Multi-racial	75	4.0%	3.6%
Declined to report	201	10.6%	1.4%
0 Bedrooms only	2	0.1%	-
1 Bedrooms (may have applied for both 0- and 1-br)	958	50.6%	-
2 Bedrooms	548	29.0%	-
3 Bedrooms	308	16.3%	-
4 Bedrooms	71	3.8%	-
>4 Bedrooms	6	0.3%	-

¹Source for Lorain County statistics: http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

²Race and ethnicity percentages are based upon Lorain County population, not households

³Statistics reflect characteristics of persons who have *applied* for housing. Not all applicants are on a waiting list.

⁴The number of families with children is actually households with 2 or more family members.

B.1b

Housing Needs of MULTIFAMILY HOUSING (Harr/International Plazas) APPLICANTS ³			Statistics for Lorain County Households ^{1,2}
NOTE: LMHA is currently accepting MF applications.	# of Families	% of Total Families	
Totals as of December 28, 2017	570	100%	117,298
Extremely low income (<=30% AMI)	564	99.0%	15%
Very low income (>30% but <=50% AMI)	6	1.1%	7%
Low Income (>50% but <80% AMI)	0	0%	13%
Elderly/Near Elderly families	203	35.6%	12%
Families with Disabilities	353	62.0%	-
Hispanic	18	20.7%	9%
Non-Hispanic	439	77.0%	91%
Declined to Report	13	2.3%	-
White	296	52%	85.3%
Black/African American	193	33.9%	8.4%
American Indian/Alaska Native	2	0.4%	0.3%
Asian	0	0%	1.0%
Native Hawaiian/other Pacific Islander	4	0.7%	0.0%
Multi-racial	11	1.9%	3.6%
Declined to report	0	0%	1.4%

¹Source for Lorain County statistics: http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

²Race and ethnicity percentages are based upon Lorain County population, not households

³Statistics reflect characteristics of persons who have *applied* for housing. Not all applicants are on a waiting list.

B.1b

Housing statistics of current LMHA families

Total HCVP Families (12/28/17)	3158	100.0%
Disabled HOH	1347	42.7%
Elderly HOH	490	15.5%
Hispanic	794	25.1%
Non Hispanic	2364	74.9%
Female HOH	2621	83.0%
Male HOH	537	17.0%
White	1753	55.5%
Black/African American	1311	41.5%
American Indian/Alaskan Native	27	0.9%
Native Hawaiian/Other Pacific Islander	22	0.7%
Asian	1	0.03%
Multi-Racial/Declined to Report	44	1.4%

Total Public Housing Families (12/18/17)	1405	100.0%
Disabled HOH	497	35.4%
Elderly HOH	177	12.6%
Hispanic	360	25.6%
Non Hispanic	1045	74.4%
Female HOH	1029	73.2%
Male HOH	376	26.8%
White	802	57.1%
Black/African American	551	39.2%
American Indian/Alaskan Native	11	0.8%
Native Hawaiian/Other Pacific Islander	18	1.0%
Asian	1	0.1%
Multi-Racial	22	2.0%

Total Multifamily Housing Families (Harr and International Plazas) (12/28/17)	198	100.0%
Disabled HOH	179	90.4%
Elderly HOH	71	35.9%
Hispanic	37	18.7%
Non Hispanic	161	81.3%
Female HOH	103	52.0%
Male HOH	95	48.0%
White	143	72.2%
Black/African American	48	24.2%
American Indian/Alaskan Native	2	1.0%
Native Hawaiian/Other Pacific Islander	1	0.5%
Asian	1	0.5%
Multi-Racial	2	1.0%
Declined to Report	1	0.5%

B.1b

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

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

LMHA's Deconcentration Policy, included in this document in Section B.1(c) will not change. To address deconcentration issues, LMHA has chosen a strategy of working with current households to raise their incomes rather than adjusting admissions policies or criteria. With more than 93% of the public housing households being ELI, 19.5% having zero annual income, and none of the public housing properties being above the high end of the EIR, there are no opportunities to transfer higher income residents to lower income properties.

The LMHA conducts an annual deconcentration of poverty and income mixing analysis in accordance with 24 CFR Part 903Subpart A and records the information in B.1(c).

Summary of policies governing eligibility, selection and admission

Statement of Policies that govern resident or tenant eligibility, selection and admission, and procedures for maintaining the waiting list: Applications for LMHA's housing programs are generated online at www.lmha.org. The Placement Department processes all applications following eligibility and tenant selection procedures defined in the respective program's policies: PH follows the Admissions and Continued Occupancy Policy (ACOP); HCVP follows the HCVP Administrative Plan; Section 8 New Construction follows the Tenant Selection Plan. These documents are posted online and are available at LMHA administrative offices. The Public Housing ACOP shall apply to households entering the LMHA Oberlin Homes Low Income Housing Tax Credit (LIHTC) units. However, the requirements of the LIHTC program must also be met.

Pre-applications are accepted at www.lmha.org. LMHA's software automatically time and date stamps online pre-applications upon completion. Family composition will be determined by the information provided by the applicant when the online pre-application is submitted. Bedroom size shall be based upon family composition, reasonable accommodations, and LMHA occupancy standards. No preferences are used. Waiting lists for PH are based on bedroom size. LMHA does not maintain site based waiting lists.

Applicants are notified by mail of an eligibility interview when their application reaches the top of the list and there is a need for applicants for that program and/or bedroom size. Should an applicant miss their original appointment, a second and final appointment will be scheduled. All applicants must meet the eligibility criteria for the program they are applying for, including a background check to determine if the applicant's admittance would have a detrimental effect on other tenants or on the development environment.

Applicants are required to notify the Placement Department in writing within ten (10) business days of any change in address, telephone number, family composition, or income/assets. If the applicant is offered a unit and they report changes to their information at that time, the applicant will have three (3) business days to submit their information to the Placement Department for verification, or LMHA will offer the unit to the next applicant on wait list. Failure to provide the documentation is considered unit refusal and cause for removal from the waiting list.

During the application process, should an applicant fail to comply with the application process and/or fail to provide required documentation and/or fail to reply to correspondence, their applications will be removed from the waiting list. Applicants are given a deadline of ten (10) business days to respond, however files are not removed from the waiting list until thirty (30) days have elapsed since the HA's request. Once an application is removed from the waiting list, the applicant must reapply. Applications will not be reinstated to the waiting list unless they were removed in error by the HA.

Unit Assignment Policies for PH and multifamily housing (Harr and International Plaza) units:

Applicants shall be selected in sequence by applicant date and time of application for appropriate size units. Should two (2) or more eligible applicants have identical date and time of application, placement on waiting list shall be determined by any relevant state or federal regulation. The applicant must accept the vacancy offered within three (3) business days of the date the offer is communicated by phone, voicemail, or email, or text message, if technologically possible. If the applicant cannot be reached by phone or email contact information listed on the application within this time frame, then LMHA will offer the unit to next applicant on waiting list.

For applicants that could not be reached via telephone or email, they will receive a letter indicating LMHA was unable to reach them by the phone number or email address provided. This correspondence will inform the applicant to update telephone and/or email address information so they can be offered next available unit. If there is no response to the request for updated telephone information within ten (10) business days, the applicant will be removed from the waiting list. Consideration of additional time may be given in documented extenuating medical and/or other situations, as well as for reasonable accommodations.

Once accepted, the applicant will have five (5) business days to lease with the management office once contacted to do so. At the time of leasing, the applicant must have utilities transferred into an adult household member's name (if applicable), pay the security deposit, and any pro-rated rent for the initial month. If an applicant does not lease with the management office within this time frame, the application will be removed from the waiting list.

Financial Resources

A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

Financial Resources - Expended on eligible purposes		
1	Federal Grants - Current	
	Public Housing Operating Fund	\$6,155,560.00
	Public Housing Capital Fund	\$1,641,423.00
	HOPE VI Revitalization	\$0.00
	HOPE VI Demolition	\$0.00
	Annual Contributions for Section 8 Tenant Based Assistance	\$20,914,299.00
	Resident Opportunity and Self-Sufficiency Grants	\$352,778.00
	Community Development Block Grant	\$0.00
	HOME	\$0.00
	Other Federal Grants	\$0.00
	Shelter Plus Care	\$0.00
2	Prior Year Federal Grants(unobligated funds only)	\$285,504.00
3	Public Housing Dwelling Rental Income	\$2,084,139.00
		<hr/>
		\$31,433,703.00

B.1b

Rent Determination

A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#))

LMHA determines annual income and computes its PH, HCVP, and Project Based Section 8 rents in accordance with respective HUD regulations defined in 24 CFR Part 5 Subpart F, 24 CFR Part 960, Public Housing Occupancy Guidebook, HUD notices, the LMHA Public Housing ACOP (Chapters 6 and 9), the LMHA HCVP Administrative Plan (Chapters 6 and 12), HUD Handbook 4350.3, and the LCEHC Tenant Selection Plan.

The amounts specifically excluded from income by any other Federal statute as mandated by 24 CFR 5.609(c)(17) are published in the Federal Register and are listed in Chapter 6 of the ACOP.

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect. The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's rent will change as a result of the increase. Families are not required to report any other changes in income or expenses.

Families may report changes in income or expenses at any time. Families may request an interim reexamination any time the family has experienced a change in circumstances since the last determination. LMHA must process the request if the family reports a change that will result in a reduced family income. If a family reports a decrease in income from the loss of welfare benefits due to fraud or non-compliance with a welfare agency requirement to participate in an economic self-sufficiency program, the family's share of the rent will not be reduced. If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination. If a family reports a change that it was not required to report and that would result in a decrease in the tenant rent, the PHA will conduct an interim reexamination.

A tenant living in Harr Plaza or International Plaza will only see their rent increase if the gross monthly income increases by two hundred dollars (\$200.00).

Minimum Rents

LMHA's minimum rent for public housing units is fifty dollars (\$50.00). In order for a family to qualify for the minimum rent hardship exemption, the family's circumstances must fall under one of the following hardship criteria:

- The family has lost eligibility or is awaiting eligibility determination for federal, state, or local assistance.
- The family would be evicted as a result of the imposition of the minimum rent requirement.
- The income of the family has decreased because of changed circumstances, including loss of employment, death in the family, or other circumstances as determined by LMHA or HUD

(More details on the Minimum Rent Hardship Exemption are in the ACOP.)

Housing Choice Voucher Program rents are determined in accordance with the provisions defined in the HCVP Administrative Plan. Minimum rent will be implemented, at the discretion of the LMHA, with a 60 day notice to HCVP participants.

Payment standards are 100% of the FMRs.

If it is determined by LMHA to implement a minimum rent in the HCV program, there will be a minimum TTP of \$50. LMHA will provide a 60-day notice to participants prior to implementation.

Flat Rents

Flat rents are intended as an incentive for residents to remain in public housing who are attempting to become economically self-sufficient or have attained a level of self-sufficiency. A flat rent is the amount the family pays to LMHA for a specific bedroom size. Changes in family income or composition will not affect the flat rent amount because it is outside the income-based formula.

Effective October 1, 2014 LMHA amended its flat rent policies to comply with the statutory changes contained within PIH Notice 2014-12 and Public Law 113-76, the FY 2014 Appropriations Act. Effective July 1, 2016, LMHA amended its flat rent policies to comply with PIH Notice 2015-13.

The FY 2015 Appropriations Act amended the public housing rent requirements for flat rents to require that flat rents must be set at no less than the lower of 80 percent of:

1. the applicable fair market rental established under section 8(c) of this Act; or
2. at the discretion of the Secretary, such other applicable fair market rental established by the Secretary that the Secretary determines more accurately reflects local market conditions and is based on an applicable market area that is geographically smaller than the applicable market area used for purposes of the applicable fair market rental under section 8(c);

A PHA may apply for an exception waiver allowing for a flat rental amount for a property that is lower than the amount outlined in the options above. The Secretary may grant such an exception if HUD determines that the fair market rent for the applicable market area does not reflect the market value of the property and the proposed lower flat rental amount is based on a market analysis of the applicable market. Requests for exception rents must be made in accordance with procedures described in PIH Notice 2015-13 or subsequent notices.

The FY 2015 Appropriations Act maintained the protection that any rent increase of more than 35 percent due to the flat rent changes must be phased in as necessary.

The LMHA will set the flat rental amount for each public housing unit that complies with the requirement that all flat rents be set at no less than 80% of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utility costs.

Families who pay a flat rent and are responsible for making direct payments to the utility companies shall have their flat rent reduced by the appropriate utility allowance.

B.1b**Flat Rent Policies – How to comply on an annual basis**

In order to comply with the flat rent requirements annually, no later than 90 days after issuance of new FMRs or SAFMRs by HUD, the PHA must:

- 1) Compare the current flat rent amount to the applicable FMR and SAFMR/unadjusted rent:
 - a) If the flat rent is at least 80 percent of the lower of the FMR or SAFMR/unadjusted rent, the PHA is in compliance with the law, and no further steps are necessary;
 - b) If the flat rent is less than 80 percent of the lower of the FMR and SAFMR, the PHA must set flat rents at no less than 80 percent of the lower of the FMR or SAFMR/unadjusted rent, subject to the utilities adjustment in section 5 of this PIH Notice 2015-13, or the PHA may request an exception flat rent pursuant to the requirements of Section 4 of PIH Notice 2015-13;
- 2) Update the flat rent policies in the Admissions and Continued Occupancy Policies (ACOP) as necessary;
- 3) At all new admissions, permit the family to choose between the flat rent amount and the income-based rent; and
- 4) For families that are current public housing residents, offer the updated flat rent amount at the next annual rent option, and permit the family to choose between the flat rent amount and the income-based rent, subject to the requirements of Section 7 of PIH Notice 2015-13.

Updating flat rents based on changes to the FMR by HUD does not constitute a significant amendment to the Annual Plan. Updated Flat Rent schedules are mailed to all residents, posted at all LMHA management offices, and are listed on LMHA's website at www.lmha.org.

Conducting Annual Rent Options [24CFR 960.253(a),(e)]

HUD regulations at 24 CFR 960.253(a) requires PHAs to annually give families the option to choose between paying the flat rent or the income-based rent, and stipulates that PHAs may not give families the option more than once per year, except in the case that the family has chosen the flat rent and experiences a financial hardship. Further, 24 CFR 960.253(e) stipulates that PHAs provide sufficient information to allow a family to make an informed choice regarding rent options. PHAs must provide at least the following information:

- The PHA's policies on switching the type of rent due to financial hardship;
- The dollar amount of the flat rent and the income-based rent.

For families who choose to pay flat rents, PHAs are provided the flexibility not to conduct income re-examinations annually. HUD regulations at 24 CFR §960.253(e)(2) and §960.257(a)(2) provide that for families that chose to pay flat rents PHAs must conduct re-examinations of family income at least once every three years, not annually. In years when a PHA does not conduct a full re-examination of family income, PHAs are not released from the requirement to give the family the option of paying the flat rent or the income-based rent as calculated from the most recent examination of family income and composition.

In order for PHAs to comply with the requirements to conduct an annual rent option, and to provide families with sufficient information to make an informed choice, PHAs must do the following:

At initial occupancy, or in any year where a current program participating family is paying the income-based rent:

- 1) Conduct a full examination of family income and composition at the first annual rent option (Year 1);
- 2) Inform the family of the flat rent amount and the rent amount determined by the examination of family income and composition;
- 3) Inform the family of the PHA's policies on switching rent types due to financial hardship; and
- 4) Apply the family's rent decision at the next lease renewal.

At the second and third annual rent options for families that choose to pay the flat rent:

- 1) PHAs may, but are not required to conduct a full examination of family income and composition for the second and third annual rent options. If a PHA chooses not to conduct an examination of family income for these annual rent options, PHAs must use the income information from the examination of family income and composition from the first annual rent option;
- 2) PHAs must inform the family of the updated flat rent amount, and the rent amount determined by the most recent examination of family income and composition;
- 3) PHAs must inform the family of the PHA's policies on switching rent types due to financial hardship; and
- 4) PHAs must apply the family's rent decision at the next lease renewal.

For the purpose of conducting the rent option meeting for a family that has paid the flat rent for the previous three years, and for which the PHA has not conducted a reexamination of family income and composition in the last three years, the PHA must complete a full reexamination of family income and composition in order to update the income-based rent amount.

PHAs are reminded that the flat rent amount a family pays is not locked in for the three year period. Instead, the PHA must revise the flat rent amount from year to year based on changes to the FMR. Families currently paying the flat rent amount must be offered the choice between the updated flat rent amount, and the previously calculated income-based rent.

Mixed Families

LMHA shall use the flat rent applicable to the unit to calculate rent for mixed families, except in situations where the mixed family's total tenant payment (TTP) exceeds the flat rent. A mixed family whose TTP is higher than the Flat Rent can NOT elect Flat Rent but must use the TTP calculated tenant rent. The PHA shall subtract the utility allowance from the TTP to obtain the Tenant Rent.

Switching from Flat Rent to Income-Based Rent Due to Hardship [24CFR 960.253(f)]

The QHWR requires a PHA to immediately switch a family from a flat rent to an income based rent if the PHA determines that the family has a financial hardship circumstance. When the family requests a change, LMHA will conduct an examination of the family's income in order to switch the family to an income-based rent amount. The rent will change to an income-based rent amount the first of the month following the month the family reported the hardship. Once the family switches to an income-based rent, the family may not return to the flat rent until the next scheduled annual recertification. LMHA will consider the following circumstances a hardship:

- loss or reduction of employment
- death in the family
- increase in the family's expenses for medical costs
- increase in child care costs
- transportation or education costs

B.1b	<p style="text-align: center;">Operations and Management</p> <p>A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))</p> <p>LMHA operates and manages public housing properties, a Low Income Housing Tax Credit property, multifamily housing/project-based properties (funded under the Section 8 New Construction program), and the Housing Choice Voucher Program.</p> <p>LMHA is governed by a Board of Commissioners which contracts with three employees to lead the Housing Authority: Executive Director, Assistant Director, and Finance Director. The Authority is comprised of various departments administer its programs: executive management, accounting, contract administration/procurement, admissions, work orders, resident services, building receptionists, Housing Choice Voucher Program, and public/multifamily housing property management. Property management is comprised of 5 public housing AMPs and 5 management/maintenance teams, one of which is responsible for the multifamily properties.</p> <p>LMHA's rules, standards, and policies for governing the management and maintenance of public housing and LIHTC properties are contained in LMHA's Public Housing Admissions and Continued Occupancy Policy (ACOP).</p> <p>LMHA's rules, standards, and policies for governing the management and maintenance of multifamily housing properties are contained the Harr and International Plaza Tenant Selection Plan.</p> <p>LMHA's rules, standards, and policies for governing the management of the Housing Choice Voucher Program are contained in LMHA's HCVP Administrative Plan.</p> <p>These documents are posted at www.lmha.org/about-lmha/lmha-policies/</p> <p>LMHA has incorporated the five (5) components of internal control and 17 related principles from Standards for Internal Control in the Federal Government, a.k.a. the "Green Book." These standards form the framework of LMHA's risk assessment process and internal control system and are integrated into the Authority's organizational structure and culture.</p> <p>LMHA's Public Housing ACOP, HCVP Administrative Plan, and the Tenant Selection Plan incorporate a variety of rules, standards, policies, and procedures which govern the management, operation and maintenance of the Public Housing, Multifamily Housing, and the Housing Choice Voucher programs. Some policies may not apply to all programs. Some documents are stand alone and are not in the Policy or Plans. The list of rules, standards, policies, and procedures include, but are not limited to:</p> <ul style="list-style-type: none"> Air Conditioner Surcharge Policy Applicant Screening Process Appointment of Personal Designee Policy Biohazard Cleanup Procedure Canvassing Policy Community Room Policy Community Service Policy Confidentiality Policy Deconcentration Policy Drug Free Safety Program EIV Usage & Security Policy Elevator Entrapment Procedure Emergency Evacuation Procedures Ethics/Conflict of Interest Policy Eviction Policy Excess Water Consumption Surcharge Policy Fair Housing Plan Flat Rent Policy Flood Cleanup Procedure Hazard Communication Program House Inspection Policy Housekeeping Policy Housekeeping Referral Program
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B.1b	<p> ID Policy for entrance into High Rises Identity Theft Prevention Policy Integrated Pest Management Extermination & Bed Bug Policy Key Usage Policy Key Usage Policy Language Access Plan (Limited English Proficiency (LEP)) Minimum Rent Policy One Strike Policy Personal Information Policy Pet Policy/Assistance Animal Policy Procurement Policy Public Records Request Policy Reasonable Accommodations Procedure Manual Records Retention Policy Satellite Dish Installation Procedure Scattered Site Eligibility Criteria Self-Employment/Small Business Income Policy Smoke Detector Policy Smoke Free Policy Social Media Policy Take Possession Policy Transfer Policy Unreported Income Repayment Policy Vacancy Management Safeguards VAWA Policy/Emergency VAWA Transfer Policy Work Order Procedures </p> <p style="text-align: center;"><u>Extermination Policies</u></p> <p>LMHA has implemented an Integrated Pest Management (IPM) program which requires a commitment from all LMHA employees, residents and extermination contractors to prevent and eradicate bed bugs, cockroaches, and other insects and vermin from all LMHA-owned/managed residential units. Cooperative efforts on the part of the LMHA as well as all residents and guests will increase the likelihood of successful eradication not only with respect to bed bugs, but also regarding future infestations which pose a severe threat of contamination and are adverse to the health, safety, and welfare of LMHA residents.</p> <p>All tenants must immediately notify the LMHA of the presence of bed bugs or other insects or vermin in or around his or her unit and cooperate with the LMHA extermination services. After the resident makes the report, LMHA shall schedule an appointment for an inspection of the unit and personal property of the resident.</p> <p>Upon inspection, if the exterminator confirms the presence of roaches, bed bugs, insects, rodents, or animals, the reporting resident's apartment will be scheduled for extermination services. The resident will be responsible for the preparation of his or her unit for these services. Before the extermination services are started, an appointment letter with a description of all preparation requirements will be provided to the resident.</p> <p>During the course of routine maintenance, inspection, or other services, if it is found that a resident has a pest or insect infestation that has not been previously reported or that has remained unresolved, then the resident will be scheduled for extermination treatment. In this case, the LMHA will notify the resident of the preparation required for the extermination and the date of the treatment.</p> <p>In cases of severe infestations of either bed bugs or other varmint that pose a similar threat of severe contamination, it may be necessary for the furnishings of the resident to be removed from the premises. This will only occur when the pest control contractor advises both the LMHA and the resident in writing that no level of extermination treatment could safely remove or eliminate the pests which are infesting the resident's furniture or belongings. Notably, such furnishings must be completely removed from LMHA property; containment or dumping in dumpsters or trash bins located on property owned or operated by the LMHA will not be permitted. In such cases, LMHA strongly advises the resident to destroy the furnishings and LMHA will assist with this process upon request at no charge to the resident.</p> <p>Due to the persistent nature of some insect infestations, such as bed bugs and cockroaches, LMHA will continue to have the extermination contractor inspect and treat the unit on a recurring basis until the infestation has been eliminated.</p>
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ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes

The ACOP that LMHA will use effective July 1, 2018 will look entirely different from previous versions. LMHA has elected to utilize a template for the ACOP created by Nan McKay and Associates. The table of contents, section and page numbering, layout, and appendices will be different, but the majority of the policies will remain the same. The significant changes to policy for July 1, 2018 follow:

3-I.C. FAMILY BREAKUP AND REMAINING MEMBER OF TENANT FAMILY

If a court determines the disposition of property between members of an applicant or resident family, the PHA will abide by the court's determination.

In the absence of a judicial decision, the household member being removed must provide a notarized statement requesting to be removed from the household and provide proof of address.

3-I.F. DEPENDENT [24 CFR 5.603]

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 50 percent or more of the time.

When more than one applicant or assisted family (regardless of program) are claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, an IRS income tax return showing which family has claimed the child for income tax purposes, school records, or other credible documentation.

3-I.J. GUESTS [24 CFR 5.100]

Former residents who have been evicted in the past year are not permitted as overnight guests.

3-I.L. ABSENT FAMILY MEMBERS

Absence Due to Incarceration

An individual who is incarcerated for more than 180 consecutive days is not considered a family member.

3-III.B. REQUIRED DENIAL OF ADMISSION [24 CFR 960.204]

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine.

4-II.B. ORGANIZATION OF THE WAITING LIST

The PHA will maintain one single community-wide waiting list for its developments. Within the list, the PHA will designate subparts to easily identify who should be offered the next available unit (i.e. mixed populations, general occupancy, unit size, and accessible units).

4-II.F. UPDATING THE WAITING LIST

Purging the Waiting List

The waiting list will be updated as needed to ensure that all applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by mail, by fax, by Tenant Portal when available, or by email to Admissions@lmha.org. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter.

If the family fails to respond within 15 business days, the family will be sent a second notice giving them 10 business days to respond in writing. If they fail to respond to the second notice within the required time frame, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes (continued)

When a family is removed from the waiting list during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore, no informal hearing is required.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if the lack of response was due to PHA error, or to circumstances beyond the family's control.

5-I.B. DETERMINING UNIT SIZE

Persons of different generations (defined as 7 years) and unrelated adults will not be required to share a bedroom

The PHA will reference the following standards in determining the appropriate unit bedroom size for a family:

BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS
0	1	1
1	1	2
2	2	4
3	3	6
4	4	8
5	6	10
6	8	12

5-II.B. NUMBER OF OFFERS

The PHA has adopted a "one-to-two offer plan" for offering units to applicants. Under this plan, the first qualified applicant in sequence on the waiting list will be made one offer of the next unit of the appropriate size anticipated to be ready for occupancy. Unless the applicant has good cause for refusing the offer, they will be dropped to the bottom of the waiting list by changing their application date and time to the date and time of unit refusal. When they arrive at the top of the list again, they will be offered the next unit of the appropriate size anticipated to be ready for occupancy. Unless the applicant has good cause for refusing the second offer, they will be removed from the waiting list.

6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]

Alimony and Child Support

The PHA will count court-awarded amounts for alimony and child support unless the resident provides documentation that verifies that the payments are not being made.

7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

Written Third-Party Verification Form

The family must provide written third-party verifications through the Department of Job and Family Services and Child Support websites. The PHA will not send third-party verification forms to Department of Job and Family Services or Child Support as this agency has notified us that they will not complete and return verification forms.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

Social Security/SSI Benefits

To verify the SS/SSI benefits of applicants, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member who receives social security benefits. If a family member is unable to provide the document, the PHA will help the applicant request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the family has received the original benefit verification letter, it will be required to provide the letter to the PHA.

8-II.C. NOTICE AND SCHEDULING OF INSPECTIONS

Notice of Entry

Non-emergency Entries [24 CFR 966.4(j)(1)]

Entry for repairs requested by the family will not require prior notice. If the family does not grant permission to enter the unit, then LMHA will issue a 48-hour written notice of entry, except in case of emergency or other unforeseen circumstances.

9-I.D. CONDUCTING ANNUAL REEXAMINATIONS

Criminal Background Checks

Each household member age 18 and over will be required to execute a consent form for a criminal background check as part of the annual reexamination process.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes (continued)

9-I.E. EFFECTIVE DATES

If the family causes a delay in processing the annual reexamination, *increases* in the tenant rent will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any underpaid rent and may be offered a repayment agreement in accordance with the policies in Chapter 16.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the PHA by the date specified, and this delay prevents the PHA from completing the reexamination as scheduled.

9-III.C. CHANGES AFFECTING INCOME OR EXPENSES

Family-Initiated Interim Reexaminations

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 960.257(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 960.257(b)].

Required Reporting

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect.

The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID). In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

Families are not required to report any other changes in income or expenses.

Optional Reporting

If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

If a family reports a change that it was not required to report and that would result in a decrease in the tenant rent, the PHA will conduct an interim reexamination. See Section 9-III.D. for effective dates.

Families may report changes in income or expenses at any time.

9-III.D. PROCESSING THE INTERIM REEXAMINATION

Effective Dates

If the tenant rent is to *increase*:

The increase generally will be effective on the first of the month following 30 days' notice to the family.

If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increase will be applied retroactively to the first of the month following the date in which the change occurred. The family will be responsible for any underpaid rent and may be offered a repayment agreement in accordance with the policies in Chapter 16.

If the tenant rent is to *decrease*:

The decrease in income must last in excess of thirty days. The decrease will be effective on the first day of the month following the month in which the change was reported. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively provided all required information is submitted within the required time frames, as defined in LMHA's written notice to the tenant.

9-IV.B. CHANGES IN UTILITY ALLOWANCES [24 CFR 965.507, 24 CFR 966.4]

Unless the PHA is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first annual reexamination after the allowance is adopted.

10-III.B. PET DEPOSITS

Payment of Deposit

Dog or cat pet owners are required to pay a pet deposit of \$300 in addition to any other required deposits.

Refund of Deposit

The PHA will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit or any other balances owed, within 30 days of move-out or removal of the pet from the unit after an inspection is conducted to determine any damages caused by the pet.

Pet Waste Removal Charge

A separate pet waste removal charge of \$10.00 per occurrence will be assessed against pet owners who fail to remove pet waste in accordance with this policy.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes (continued)

11-I.B. COMMUNITY SERVICE REQUIREMENT

Definitions

Exempt Individual [24 CFR 960.601(b), Notice PIH 2015-12]

The PHA will consider 20 hours per week as the minimum number of hours needed to qualify for a work activity exemption.

12-III.B. TYPES OF RESIDENT REQUESTED TRANSFERS

PHA Policy

The types of requests for transfers that the PHA will consider are limited to requests for transfers due to reasonable accommodation and transfers to a location closer to employment. No other transfer requests will be considered by the PHA.

The PHA will consider the following as high priority transfer requests:

When a family requests a transfer as a reasonable accommodation. Examples of a reasonable accommodation transfer include, but are not limited to, a transfer to a first floor unit for a person with mobility impairment, or a transfer to a unit with accessible features

The PHA will consider the following as regular priority transfer requests:

When a family requests a larger bedroom size unit even though the family does not meet the PHA's definition of overcrowded, as long as the family meets the PHA's occupancy standards for the requested size unit.

When the family has resided in a Public Housing unit for two years and head of household, co-head, or spouse has been employed 180 days, has no reliable transportation, public transportation is not adequate, and the transfer would make them at least 2 miles closer than their current unit

12-III.C. ELIGIBILITY FOR TRANSFER

Except where reasonable accommodation is being requested, the PHA will only consider transfer requests from residents that meet the following requirements:

Have resided at current LMHA unit for at least 2 years

Have not engaged in criminal activity that threatens the health and safety of residents and staff

Owe no back rent or other charges, or have a pattern of late payment

Have no housekeeping lease violations or history of damaging property

Can get utilities turned on in the name of an adult member of the household (applicable only to properties with tenant-paid utilities)

Owe no community service hours

Cleared from extermination

A resident with housekeeping standards violations will not be approved for transfer until the resident passes a follow-up housekeeping inspection. In the case of housekeeping standards violations, if, after one follow up inspection, the family is still not meeting standards, they must wait six months to apply for another transfer.

THE FOLLOWING ARE THE CHANGES PROPOSED FOR THE SIGNIFICANT AMENDMENT TO THE ANNUAL PLAN

CURRENT:

Page 13-18 13-III.C. OTHER AUTHORIZED REASONS FOR TERMINATION

Over-Income Families [24 CFR 960.261 and FR 11/26/04, p. 68786]

Subject to certain restrictions, HUD authorizes PHAs to evict or terminate the tenancies of families because they are over income. Unless required to do so by local law, the PHA may not evict or terminate the tenancy of a family solely because the family is over income if: (1) the family has a valid contract of participation in the Family Self-Sufficiency (FSS) program, or (2) the family is currently receiving the earned income disallowance. This rule does not require PHAs to evict over-income residents, but rather gives PHAs the discretion to do so thereby making units available for applicants who are income-eligible.

PHA Policy

The PHA will not evict or terminate the tenancies of families solely because they are over income.

PROPOSED:

Page 13-18 13-III.C. OTHER AUTHORIZED REASONS FOR TERMINATION

Over-Income Families [24 CFR 960.261; FR Notice 7/26/18]

The Housing Opportunity Through Modernization Act (HOTMA) of 2016 placed an income limitation on public housing tenancies. The over-income requirement states that after a family's income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for two consecutive years, the PHA must either terminate the family's tenancy within six months of the determination, or charge the family a monthly rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit, including amounts from the operating and capital funds, as determined by regulations.

PHAs also have discretion, under 24 CFR 960.261, to adopt policies allowing termination of tenancy for families whose income exceeds the limit for program eligibility. Such policies would exempt families participating in the Family Self-Sufficiency (FSS) program or currently receiving the earned income disallowance.

PHA Policy

At annual or interim reexamination, if a family's income exceeds the applicable over-income limit, the PHA will document the family file and begin tracking the family's over-income status.

If one year after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, the PHA will notify the family in writing that their income has exceeded the over-income limit for one year, and that if the family continues to be over-income for 12 consecutive months, the family will be subject to the PHA's over-income policies.

If two years after the applicable annual or interim reexamination the family's income continues to exceed the applicable over-income limit, the PHA will charge the family a rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit. The PHA will notify the family in writing of their new rent amount. The new rent amount will be effective 30 days after the PHA's written notice to the family.

If, at any time, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with PHA policy. If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification. The PHA will notify the family in writing that over-income policies no longer apply to them. If the family's income later exceeds the over-income limit again, the family is entitled to a new two-year grace period. The PHA will begin tracking over-income families once these policies have been adopted, but no later than March 24, 2019.

The PHA will not evict or terminate the tenancies of families whose income exceeds the income limit for program eligibility as described at 24 CFR 960.261.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes (continued)

13-III.D. ALTERNATIVES TO TERMINATION OF TENANCY

Exclusion of Culpable Household Member [24 CFR 966.4(l)(5)(vii)(C)]

As an alternative to termination of the lease for criminal activity or alcohol abuse HUD provides that the PHA may consider exclusion of the culpable household member. Such an alternative can be used for any other reason where such a solution appears viable in accordance with PHA policy.

Additionally, under the Violence against Women Reauthorization Act of 2013, the PHA may bifurcate a lease in order to terminate the tenancy of an individual who is a tenant or lawful occupant of a unit and engages in criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking.

The PHA will consider, on a case by case basis, requiring the tenant to exclude a household member in order to continue to reside in the assisted unit, where that household member has participated in or been culpable for action or failure to act that warrants termination.

As a condition of the family's continued occupancy, the head of household and adult being removed must certify that the culpable household member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former household member's current address upon PHA request.

13-III.E. CRITERIA FOR DECIDING TO TERMINATE TENANCY

Reasonable Accommodation [24 CFR 966.7]

If the family includes a person with disabilities, the PHA's decision to terminate the family's lease is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

PHA Policy

If a family indicates that the behavior of a family member with a disability is the reason for a proposed termination of lease, the PHA will determine whether the behavior is related to the disability. If so, upon the family's request, the PHA will determine whether alternative measures are appropriate as a reasonable accommodation. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed lease termination. See Chapter 2 for a discussion of reasonable accommodation.

13-IV.C. DISCLOSURE OF CRIMINAL RECORDS TO FAMILY [24 CFR 5.903(f), 24 CFR 5.905(d) and 24 CFR 966.4(l)(5)(iv)]

In conducting criminal records checks, if the PHA uses the authority of 24 CFR 5.903 and 5.905 to obtain such information, certain protections must be afforded the tenant before any adverse action is taken. In such cases if the PHA obtains criminal records information from a state or local agency showing that a household member has been convicted of a crime, or is subject to a sex offender registration requirement, relevant to lease enforcement or eviction, the PHA must notify the household of the proposed action and must provide the subject of the record and the tenant a copy of such information, and an opportunity to dispute the accuracy and relevance of the information before an eviction or lease enforcement action is taken.

In all cases where criminal record or sex offender registration information would result in lease enforcement or eviction, the PHA will notify the household in writing of the proposed adverse action and will provide the subject of the record and the tenant a copy of such information, and an opportunity to dispute the accuracy and relevance of the information before an eviction or lease enforcement action is taken.

The family will be given 10 business days from the date of the PHA notice, to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 10 business day period, the PHA will proceed with the termination action.

Should the tenant not exercise their right to dispute prior to any adverse action, the tenant still has the right to dispute in the grievance hearing or court trial.

14-IB. INFORMAL HEARING PROCESS [24 CFR 960.208(a) and PH Occ GB, p. 58]

Notice of Denial [24 CFR 960.208(a)]

Scheduling an Informal Hearing

When the PHA proposes denial of admission, the letter will include the date and time of a scheduled hearing. Should an applicant fail to attend or call to reschedule within 10 business days, the PHA will reschedule a hearing one time. Should the applicant fail to attend a second scheduled hearing, the PHA's decision to deny will be upheld.

16-IB UTILITY ALLOWANCES

Air-Conditioning

In units where the PHA furnishes the air conditioning, the resident has the option to choose to use the air conditioning, and the resident pays for the utilities, then in order to comply with the provision of 24 CFR § 965.505 (e), i.e., that the PHA "shall not include air conditioning in the utility allowances," then it is necessary to subtract from the utility allowance the average cost of the use of the air conditioning.

B.1b	<p style="text-align: center;"><u>Housing Choice Voucher Program Administrative Plan Changes</u></p> <p>All 14 day reporting requirements were changed to 10 business days in order to coincide with PH.</p> <p>Page 29. Chapter 2 Eligibility for Admission, Section G. Tenant Screening Add “Applicant” to Tenant Screening to read “Applicant/Tenant Screening”</p> <p>Page 36. Chapter 3 Applying For Admission, Section D. Applicant Status While On Waiting List. Add “at the time of updating the file for anticipated voucher issuance”. Remove “after the PHA has been notified and verification has been received.” To read “The PHA will affect changes in a person’s file only at the time of updating the file anticipated voucher issuance.”</p> <p>Page 54. Chapter 5 Determining Family (Voucher) Size Change generation differentiation from ten (10) to seven (7) years. “Persons of different generations will be given separate bedrooms. Generation is defined as children of the same sex where there is a difference in age by 7 years. The Housing Authority has discretion to grant separate bedrooms for same sex minors upon the family’s request if there is strong evidence to support such request. This request must be approved by HCVF supervising staff.”</p> <p>Page 60. Chapter 6. A. Minimum Rent Add financial hardship exemptions. <u>Financial Hardship Exemption</u> The financial hardship exemption only applies to payment of the minimum rent. The PHA must grant an exemption from payment of minimum rent if the family is unable to pay the minimum rent because of financial hardship.</p> <p>Financial hardship includes:</p> <ul style="list-style-type: none"> • When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State, or local assistance program, including a family that includes a member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for title IV of the Personal Responsibility and Work Opportunity Act of 1996; • When the family would be evicted because it is unable to pay the minimum rent; • When the income of the family has decreased because of changed circumstances, including loss of employment; • When a death has occurred in the family; and • Other circumstances determined by the PHA or HUD <ul style="list-style-type: none"> • The PHA has not established any additional hardship criteria. <p>Page 66. Chapter 6. Factors Related To Total Tenant Payment and Family Share Determination. Section B. Disallowance of Earned Income From Rent Determinations for Persons with Disabilities Correct the time frame for EID from 48 months to 24 months to read “Ending date of the maximum 24 month (2 year) disallowance period (24 months from the date of the initial earned income disallowances).”</p> <p>Page 74. Chapter 6. Factors Related To Total Tenant Payment and Family Share Determination. Section F. Regular Contributions and Gifts Remove “Regular contributions and gifts received from persons outside the household are counted as income for calculation of the Total Tenant Payment. Any contribution or gift received every 3 months or more frequently will be considered a "regular" contribution or gift, unless the amount is less than \$480 per year. This includes rent and utility payments made on behalf of the family and other cash or non-cash contributions provided on a regular basis. It does not include casual contributions or sporadic gifts. (See "Verification Procedures" chapter). If the family's expenses exceed its known income, the PHA will require the family to provide written information regarding their accessible resources and means of basic subsistence (food, daily personal items, utilities, phone, transportation, cable, etc.) on a quarterly basis.”</p> <p>Add “The PHA must count as income regular monetary and nonmonetary contributions or gifts from persons not residing with a tenant family [24 CFR 5.609(b)(7)]. Temporary, nonrecurring, or sporadic income and gifts are not counted [24 CFR 5.609(c)(9)].</p> <p>Examples of regular contributions include: (1) regular payment of a family’s bills (e.g., utilities, telephone, rent, credit cards, and car payments), (2) cash or other liquid assets provided to any family member on a regular basis, and (3) “in-kind” contributions such as groceries and clothing provided to a family on a regular basis.</p> <p>Nonmonetary contributions will be valued at the cost of purchasing the items, as determined by the PHA. For contributions that may vary from month to month (e.g., utility payments), the PHA will include an average amount based upon past history.”</p> <p>Page 84. Chapter 7. Verification Procedures. Section A. Methods of Verification and Time Allowed. Under Review of Documents: Remove “signed” and “applicant” to read “All such documents will be photocopied and dated by the person who does the copying and retained in the family’s file.”</p> <p>Page 95. Chapter 7. Verification Procedures. Section I. Verifying Non-Financial Factors Remove “church issued baptismal certificates”</p> <p>Page 96. Chapter 7. Verification Procedures. Section I. Verifying Non-Financial Factors Familial Relationships. Remove “baptismal certificates”</p>
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Housing Choice Voucher Program Administrative Plan Changes (continued)

Page 106. Chapter 8. Voucher Issuance and Briefings. Section B. Briefing Types and Required Attendance.

Mover Briefing:

Add “the family must comply with the moving orientation requirements”.

Remove “the moving orientation requirements. Occupancy Specialist assigned to the family’s part of the alphabet will schedule the family for a moving orientation. Once the family has attended the moving orientation, they will receive the Request For Tenancy Approval.”

Remove “attended the”

Remove “and out of” to read:

After completing the moving process, the family must comply with the moving orientation requirements. Once the family has complied with the moving orientation requirements, they will receive the Request For Tenancy Approval. Families porting into Lorain County will be required to attend a moving orientation.

Landlord Briefing

Change “two years” to “five years” to read “To assure successful owner participation in the program, landlords (including out-of-state and/or agents) participating in the Housing Choice Voucher Program must attend a landlord briefing every five years”.

Remove “Interested owners who request to sit in on scheduled family briefings to obtain information about the Voucher program will be allowed to do so”.

Page 108. Chapter 8. Voucher Issuance and Briefings. Section F. Term of Voucher. Portability.

Add clarification from new portability rule to say “The PHA will issue a voucher for 120 days and extend the term of the voucher an additional 30 days from the initial housing authority’s voucher date.

Remove “for extenuating circumstances. This exception will be addressed on a case-by-case basis.

Page 109. Chapter 8. Voucher Issuance and Briefings. Section F. Term of Voucher. Suspensions (tolling)

When a Request for Tenancy Approval is received, LMHA will freeze the number of days on the term of the voucher while the request is being processed.

Page 122. Chapter 10. Housing Quality Standards and Inspections

Change annually to biennially to read “The PHA will inspect each unit under contact at least biennially”.

Page 123 Chapter 10. Housing Quality Standards and Inspections. Section A.

Change Annual to Biennial and change 12 to 24 months

Remove “annual” to read “2. Biennial: Must be conducted within 24 months of the last inspection

Page 124 Chapter 10. Housing Quality Standards and Inspections. Section C. Annual HQS Inspections

Remove “Annual” from Section title to read “HQS Inspections.

Remove the word “annual” and “prior to the annual review date, so that the inspections are conducted at least annually as required by SEMAP. The tenant’s annual review date is the initial date of the HAP Contract.”

Add “from the last inspection date after 60-90 days” to read “The PHA schedules inspections 60-90 days from the last inspection date.

Page 125 Chapter 10. Housing Quality Standards and Inspections. Section C. Annual HQS Inspections

Re-inspection: Change the wording to reflect a new procedure of automatically rescheduling inspection after a failed HQS to read: The PHA will schedule a re-inspection and the family and landlord will be sent notification of the inspection date, failed items and dates of abatement or contract termination.

Page 129. Chapter 10. Section J. Consequences If Family Is Responsible.

Add “If repairs are completed after the effective termination date and the tenant wishes to remain in the unit, the PHA will require a new lease and contract with an initial inspection.”

Page 131. Chapter 11. Owner Rents, Rent Reasonableness, And Payment Standards. Section B. Making Payments to Owners

Remove “checks” and insert “Housing Assistance Payments” or “Payments”.

Page 132. Chapter 11. Owner Rents, Rent Reasonableness, And Payment Standards. Section B. Making Payments to Owners

Remove “mail checks” and add “disperse direct deposit” to read “The PHA’s practice is to disperse direct deposit on the 1st of the month, or the 1st business day of a month in which the 1st falls on a weekend or holiday providing monies have been transferred from the United States Treasury.”

Replace “checks” with “payments”. Remove “PHA will not be held responsible for delays caused by the Post Office”.

Housing Choice Voucher Program Administrative Plan Changes (continued)

Page 138. Chapter 12. Recertifications. Section A. Annual Activities

Remove “There are two activities the PHA must conduct on an annual basis. These activities will be coordinated whenever possible: 1. Recertification of Income and Family Composition and 2. HQS Inspection”.

Remove “housing quality” from the next sentence to read “The PHA produces a monthly listing of units under contract to ensure that timely reviews of rent to owner and factors related to Total Tenant Payment can be made”.

Remove “annual” from annual inspections: see chapter 10. It reads “Inspections: See Chapter 10, “Housing Quality Standards and Inspections”

Page 139. Chapter 12. Recertifications. Section B. Annual Recertification/Reexamination

Add “will be sent the annual recertification documentation or” to read “The PHA will maintain a reexamination tracking system and the household will be sent the annual recertification documentation or will be notified by mail of the date and time for their interview – at least 90 days in advance of the anniversary date.

Remove: Procedure. The PHA’s procedure for conducting annual recertifications will be: Schedule the date and time of appointments and mail a notification to the family. Persons with Disabilities. Persons with disabilities, who are unable to come to the PHA’s office will be granted an accommodation of conducting the interview by mail upon verification that the accommodation requested meets the need presented by the disability. A member of the PHA staff may conduct an interview at the participant’s unit, hospital or nursing facility.

Page 140. Chapter 12. Recertifications. Section B. Annual Recertification/Reexamination

Requirements to Attend

Change the word “attend” to comply to read “The following family members will be required to comply with the recertification interview:”

Add “LMHA will mail the annual certification documentation to the family. However, there are times that the family may be required to attend, including but not limited to: Change in head of household, change in lease terms, significant change in rent, family going over income, or upon request of the family.”

Failure to Respond to Notification to Recertify

Add “comply with the annual recertification”. Remove “attend the interview”. Add “or an extension prior to the due date” to read “The written notification must state which family members are required to comply with the annual recertification. The family may call to request another appointment prior to the interview or an extension prior to the due date.”

Add “comply with”. Remove “appear for”. Remove “interview”. Add “send a second notice”. Remove “reschedule a second appointment. To read “If the family does not comply with the recertification, and has not rescheduled or made prior arrangements with the PHA, the PHA will send a second notice.

Add “comply a second time”. Remove “appear for the second appointment” to read “If the family fails to comply a second time, and has not rescheduled or made prior arrangements, the PHA will:”

Page 141-2. Chapter 12. Recertifications. Section C. Reporting Interim Changes

Increases in Income: Remove “Families will be required to report all increases in income/assets of all household members to the HA in writing within 14 business days. The HCV staff will make the determination if an interim change will be completed.

Add “Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect. The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family’s rent will change as a result of the increase. Families are not required to report any other changes in income or expenses.”

Change the word “reviews” to “certifications”

Remove “Interim reviews may be done for any changes in family composition”.

Remove “New leases & contracts”

Add “Changes in household composition” to read “The PHA will review and certify the reported information. Interim certifications shall be done for: reduction in income, quarterly agreements, changes in household composition.”

Page 143. Chapter 12. Recertifications. Section D. Other Interim Reporting Issues

Change the word “quarterly” to “annually” to read “Zero income families will be required to report annually.

Remove all of the following:

“In the following circumstances, the PHA may conduct the interim recertification by mail: Changes that will not result in a change in tenant rent or voucher size; changes in income that are normal for the family, such as seasonal employment, as a reasonable accommodation when requested”. This is due to the fact that most of the interim certifications are done through mail.

Page 148. Chapter 12. Chapter 12. Recertifications. Section G. Timely Reporting of Changes in Income and Assets

Increases in the Tenant Rent. Remove “Per the new interim policy,” and Add “there was a change in household composition” to read

“Increases will not be added if reported timely unless the family has requested the rent increase be processed for FSS purposes, there was a change in household composition, the family is moving, the family is eligible for EID, the family is on quarterly reporting or at the annual certification”.

B.1b	<p style="text-align: center;"><u>Housing Choice Voucher Program Administrative Plan Changes (continued)</u></p> <p>Page 155. Chapter 13. Moves With Continued Assistance/Portability Remove “Families must attend the mandatory moving orientation when the Voucher is issued.”</p> <p>Page 177. Chapter 15. Denial or Termination of Assistance. Section I. VASH Graduates Added this section to address VASH participants graduating from support services. “As a condition of HCV rental assistance, a HUD-VASH eligible family must receive the case management services from the VAMC. Therefore, a HUD-VASH participant family’s HCV assistance must be terminated for failure to participate, without good cause, in case management as verified by the VAMC. However, a VAMC determination that the participant family no longer requires case management is not grounds for terminating assistance. In such case, LMHA will offer the family continued HCV assistance through one of the next available vouchers, to free up the HUD-VASH voucher for another eligible family referred by the VAMC.”</p> <p>Page 179. Chapter 16. Owner Disapproval and Restriction. Section A. Identification of an Owner Change landlords “will be” to “were” to read “Effective January 1, 2013, landlords were asked to provide this office with a copy of the top portion of their most recent tax returns, as illustrated in the following diagram:”.</p> <p>Remove Beginning January 1, 2013 landlords will be asked to provide this documentation when they attend a renewal of their Landlord Briefing, or complete an online Certification. Should the landlord's information change in the future, he or she will be asked to provide a current documentation.</p> <p>Page 182. Chapter 16. Owner Disapproval and Restriction. Section D. Change in Ownership Change in Ownership due to death Remove “The HA will pay HAP up to 60 days from the date of the owner’s death if the HA has not received notice of a new landlord. After 60 days, the HAP will stop. After 180 days of no HAP payment, the contract will terminate. If the family moves before 180 days, the HAP will terminate. If we receive documentation showing proof of ownership, the HA will assign the HAP contract to the new owner and release payment once the Contract Assignment is executed.”</p> <p>Add “If a death of an owner is reported timely (within 60-days of its occurrence), the HA will continue to pay the HAP up to 60 days from the date of the owner’s death if the HA has not already received documentation of a new landlord. After 60 days, the HA will stop the HAP, but the contract will remain active up to an additional 120 days to allow the decedent’s family to legally attend to the transfer of ownership of the rental property. Should the decedent’s family provide such documentation during that time, the HA will prepare a Contract Assignment transferring ownership of the rental property into the name of the new legal ownership. If, after 180 days of no HAP payment, the decedent’s family is unwilling or unable to provide legal documentation of new ownership of the rental unit, the contract will terminate and the tenant will be issued a voucher to move. If the family moves before the full 180 days expires, the HAP will immediately terminate.</p> <p>If a death of an owner is not reported timely (61 - 180 days of its occurrence), the HA will stop the HAP with the following month’s computing. The HA will notify both the decedent’s family as well as the tenant of the immediate cease of payments. The HA will allow the contract to remain active no more than 180 days from the date of the decedent’s death in order to allow the decedent’s family to legally attend to the transfer of ownership of the rental property. Should the decedent’s family provide such documentation during that time, the HA will prepare a Contract Assignment transferring ownership of the rental property into the name of the new legal ownership. If, after 180 days of no HAP payment, the decedent’s family is unwilling or unable to provide legal documentation of new ownership of the rental unit, the contract will terminate, and the tenant will be issued a voucher to move. If the family moves before the full 180 days expires, the HAP will immediately terminate.</p> <p>If a death of an owner is not reported timely and the date of its reporting is beyond 180 days after the decedent’s death, the HA will immediate terminate the contract. The HA will notify both the decedent’s family as well as the tenant of the immediate cease of payments. The tenant will be issued a voucher to move. Should the tenant wish to remain residing in the rental unit, he/she must submit a RFTA which contains the new legal owner’s information. This would be treated as an Initial lease-up.”</p> <p>Page 188. Chapter 17 Owner or Family Debts to the PHA. Section D. Guidelines for Repayment Agreements Remove “(currently Lorain National Bank).”</p> <p>Page 192. Chapter 18 Complaints and Appeals. Section B. Informal Review Procedures For Applicants. Remove “the family must be notified of their ineligibility in writing” and add information about automatically rescheduling an informal review, to read: “When the PHA determines that an applicant is ineligible for the program, the PHA will notify the applicant in writing.”</p> <p>Add “The applicant will be sent a date and time of a scheduled informal review. Should an applicant fail to attend or call to reschedule within 10 business days, the PHA will reschedule an informal review one time. Should the applicant fail to attend a second informal review, the PHA’s decision to deny will be upheld.”</p> <p>Page 239. Homeownership Program LMHA will require new applicants in the HCV Homeownership Program to also be participants in the HCV Family Self-Sufficiency (FSS) Program. This addendum to the Administrative Plan will now read: “Applicants for the homeownership program are encouraged to participate in this PHA’s Family Self-Sufficiency Program (FSS), unless the applicant is elderly or a person with disabilities.”</p>
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B.1b	<p style="text-align: center;"><u>Grievance Procedures</u></p> <p>A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))</p> <p>LMHA's Grievance Procedures comply with 24 CFR Subpart B, §966.50-57 and are contained in the Public Housing ACOP Chapter 14 and HCVP Administrative Plan Chapter 18.</p> <p>Grievances must be presented within 10 business days after the occurrence of the event giving rise to the grievance. Management has 10 business days to hold or schedule an informal settlement conference, and 10 business days after the informal settlement conference to issue a written summary to the Complainant. If the Complainant is not satisfied with the results of the informal settlement conference, the Complainant must submit a written request for a formal hearing no later than 10 business days after the date Complainant receives the summary. The request must state the reasons for the grievance and the action sought. A formal hearing shall be scheduled by the hearing officer for a within 10 business days of Complainant's request. The hearing officer shall issue a written decision, together with the reasons for the decision within 10 business days after the completion of the hearing.</p> <p style="text-align: center;"><u>Homeownership Programs</u></p> <p>A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))</p> <p>LMHA's Housing Choice Voucher Home Ownership Program has 76 active participants and has assisted 160 participants in purchasing homes since the program's inception. Eleven (11) participants became new homeowners in 2017 and five (5) HCVHOP participants went over-income and off assistance. Two (2) participants reached their 15-year time limit. LMHA has a goal of seven (7) new homeowners in 2018.</p> <p>LMHA is amending the HCV Home Ownership Program to require new applicants to also be enrolled in the HCV Family Self Sufficiency (FSS) program.</p> <p style="text-align: center;"><u>Community Service and Self Sufficiency Programs</u></p> <p>Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(i)) A description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. (24 CFR §903.7(i))</p> <p>LMHA follows HUD guidance in its implementation of the Community Service and Self Sufficiency Requirements (CSSR). LMHA's CSSR policy is Chapter 11 in the ACOP. LMHA complies with the CSSR by notifying each family of the compliance requirements, tracking each adult resident, determining exempt status, and tracking compliance of those who are not exempt.</p> <p>LMHA provides each family with a copy of the Community Service Policy at lease-up, when a new adult is added to the household, when a family member turns 18, and at any time upon the family's request.</p> <p>On an annual basis, at the time of lease renewal, LMHA will notify the family in writing of the family members who are subject to the community service requirement and the family members who are exempt. If the family includes nonexempt individuals the notice will include a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which they may record the activities they perform and the number of hours contributed. The form will also have a place for a signature by an appropriate official, who will certify to the activities and hours completed.</p> <p>At least 60 days prior to lease renewal, LMHA will review and verify the exemption status of all adult family members. This verification will only be done on an annual basis unless the family reports a change or LMHA has reason to believe that an individual's exemption status has changed. For individuals who are exempt because they are 62 years of age and older, verification of exemption status will be done only at the initial examination or upon the resident reaching 62 years of age. Upon completion of the verification process, LMHA will notify the family of its determination.</p> <p>Approximately 90 days prior to the end of the lease term, LMHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit the LMHA-required documentation form(s).</p> <p>If the family fails to submit the required documentation within the required timeframe, or LMHA-approved extension, the subject family members will be considered noncompliant with community service requirements, and notices of noncompliance will be issued.</p> <p>LMHA proposes changes to the CSSR policy this year to by increasing the number of hours per week as the minimum number of hours needed to qualify for a work activity exemption from 10 to 20.</p> <p>As of December 31, 2017, approximately 39% of public housing households included at least one household member who was required to perform community service.</p>
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B.1b	<p>LMHA offers the Family Self-Sufficiency Program, a voluntary program which provides one-on-one case management to participants wishing to increase their earned income. Participants have the opportunity to earn an interest-building escrow account, just by working and paying their rent. Any increases in rent due to an increase in earned income during participation in the program result in a credit to the escrow account. Successful graduates are eligible to be awarded the total amount of their escrow balances.</p> <p>The LMHA FSS Program will strive to promote and encourage the coordination of public and private resources to enable families to achieve independence and self sufficiency, the incentive behind this promotion being the establishment of an FSS escrow account.</p> <p>FSS Participants are referred to various sites in the community if they should have need for Adult Basic Education or GED preparation. The Lorain County Joint Vocational School (JVS) offers job placement and counseling services, plus many vocational studies to help students to pursue non-traditional careers, remedial training, and concentrated training in a variety of office positions. JVS provides financial assistance through Pell grants, OIG assistance, and Single Parent Financial Assistance Program. Lorain County Community College (LCCC) offers a continuing education program through the Partnership Program, on-site childcare, financial aid, and groups designated to assist students in specific fields educationally and culturally.</p> <p>Through a grant from HUD, LMHA is able to provide enhanced direct one-on-one services utilizing the service coordination grant. Ohio Department of Jobs and Family Services assists TANF recipients in pursuing higher education, provide grant and loan information, career counseling and GED classes. LMHA has partnered with Ohio Means Jobs Lorain County to provide a one-stop location for self-help seminars, training programs, a computer lab and information about employment opportunities.</p> <p>The FSS Program Coordinating Committee is composed of representatives from Lorain County whose mission is to assist in the proper implementation of the program. Persons and agencies involved are Ohio Means Jobs Lorain County, Habitat for Humanity, El Centro, Horizon Day Care, Lorain County Community College, Northwest Savings Bank, and LMHA Resident.</p> <p>LMHA complies with the Section 3 requirements by encouraging new families to express interest in being on the list for Section 3 employment opportunities. These lists are provided to contracted service providers.</p> <p>Following are descriptions of services and amenities offered to assisted families by LMHA:</p> <ul style="list-style-type: none"> o Family Self Sufficiency (FSS) programming for LMHA public housing and HCVP residents o HCVP Home Ownership Option Program o Section 3 outreach to assisted families and those in the surrounding neighborhood o Resident Service Coordinator on staff to connect the residents with social service agencies to address their needs o Resident Service Coordinator assists in mediation between Project Managers and residents to address matters of rent payment delinquency, community service, housekeeping, lease violations & minimum rent exemption applications o Resident Services Department helps to establish and maintain Resident Councils in LMHA public housing properties and Resident Advisory Board consisting of public housing residents and HCVP participants o Green Thumb program to teach about and encourage planting of flower, perennial and urban vegetable gardens o Computer labs and internet access established in several public housing properties for resident use o Resident Assistance Watch programs to engage public housing residents in monitoring their properties. Residents can earn community service hours while participating. o Volunteer Income Tax Assistance (VITA) assists over 1,800 families in filing income tax returns and provides information about EITC program, Lorain County Free Tax Coalition has processed over 2 million dollars in refunds o Project Warm, in conjunction with Lorain County Community Action Agency, provides new winter coats to nearly 300 low-income children o Presentations provided by various speakers to discuss Medicare, Medicaid, the Affordable Care Act, Smoking Cessation, housekeeping, budgeting, home health care, medical equipment and supplies, home delivered meal programs, home delivered medication services, etc. o LMHA is a Certified Credit Counseling agency o LMHA conducts Homebuyer's Education Classes which fulfills HUD Approved Pre-Purchase Housing Counseling o Food pantry is established at Westview Terrace o Boys and Girls clubs are established in 2 properties o Junior Olympics in collaboration with the Boys and Girls Club of Lorain County o Domestic Violence Awareness task force in collaboration with the Genesis House o LMHA served as a Mary Lee Tucker application center to provide clothing for families o Lorain County Health and Dentistry operates a medical and dental center in Wilkes Villa for residents and the general public o Horizon Day Care facility in Wilkes Villa provides day care to residents and employment opportunities. As of December 31, 2017 there were 109 children who resided at Wilkes Villa served by/enrolled at Horizon. o In partnership with Horizon Education Center and the Boys and Girls Club of Lorain County, the USDA Summer Food Program provides children with breakfast and lunch at Wilkes Villa, Leavitt Homes, Westview Terrace and Southside Gardens o Offer Financial Assistance for Education to assist residents to improve work skills and achieve individual and educational goals o LMHA hosts the annual Fatherhood Initiative event at Southside Gardens, which encourages bonding between fathers (or father figures) and children while also providing available resource information from different community organizations who also attended the event o Publishes a quarterly newspaper to keep public housing residents informed on available housing and community programs o Binders with community resource information are accessible to public housing residents through each development's manager's office o Through collaboration with the Lorain County Bridges Out of Poverty, and a transportation shuttle provided by Horizon Day Care, LMHA was able to provide available community resources information such as HEAP, Safe Summer Youth Program, and literacy initiatives for the children and families from Wilkes Villa, Leavitt Homes, Westview Terrace, and throughout the community o Available community resource information was provided to residents at public housing high-rises through Farmer's Market and Resource Fairs o Residents at various LMHA properties are offered bi-monthly shuttle services to local supportive service agencies and shopping locations o In collaboration with local supportive and faith-based organizations, holiday meals were provided to residents throughout LMHA properties o LMHA participated in an eviction prevention program in collaboration with United Way and their UCAN Collaborative to assist Public Housing residents who were recently or under-employed o LMHA participated in the Tenant Based Rental Assistance (TBRA) program for HCVP participants
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B.1b

Safety and Crime Prevention

Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m))

Following is a description of LMHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

- i. Due to the incidence of drug-related and criminal activity in the areas surrounding, adjacent to, or within some of LMHA's properties, LMHA sees a need for measures to ensure the safety of its residents. Though crime rates are lower in LMHA properties when compared to any comparable geographical size or population in which they are located, residents might be fearful for the safety of their families. Additionally, some people on the waiting list are reluctant to move into one or more developments due to perceived and/or actual levels of minor and/or drug-related crime. Statistics from the Lorain Police Department show that of all the police reports and criminal violations in the city of Lorain, 729, or 10%, of the 7287 cases occurred among the 948 housing units in Lorain. Statistics from the Elyria Police Department show that of all the police reports and criminal violations in the city of Elyria, 126, or 2¼% of the 5594 cases occurred among the 452 housing units in Elyria.
- ii. LMHA contracts with off-duty police officers to provide above-baseline services by patrolling various properties. The Lorain Police Department (LPD) and LMHA have implemented a Community Policing Team at Leavitt Homes, Westview Terrace and Southside Gardens. LPD believes that they best serve when they understand the needs and expectations of the people, develop effective partnerships, and ultimately provide comprehensive service by building ties and working closely with the community. A CPT substation was established at 2139 West 24th Street to improve accessibility to residents of the Lorain public housing family developments.

LMHA resident volunteers are trained to participate in the Resident Assistance Watch (RAW) program where they provide an internal neighborhood watch program within the high rise properties. LMHA's Criminal Investigator works with law enforcement agencies and the city-wide neighborhood watch programs. LMHA has contracted a police officer with a K-9 Drug Dog to perform random patrols at LMHA owned and managed properties. This patrol is performed weekly or as needed.

Residents are provided Hot Spot cards to facilitate anonymous reporting of suspicious and criminal activity. In 2017, there were 42 Hot Spot cards submitted, but hundreds of reports were received by personal letters, emails, voice mail messages, and the "Fraud Complaint" hotline on the LMHA website. Twelve (12) households were evicted from public housing in calendar year 2017 due to criminal or drug related activities.
- iii. LMHA's Criminal Investigator meets with the local police departments and the county sheriff's department at least once per week to discuss results of patrols in LMHA properties. Lorain Police Department automatically notifies the Investigator when any report is generated at any LMHA address in the City of Lorain. The Investigator also coordinates activities with the Marshall Service, local narcotic bureaus, and detective bureaus. The Investigator and Executive Director meet annually with the Chiefs of Police and Patrol Liaison Officers to discuss crime trends, ongoing resident problems, and target areas for drugs and criminal activity.

A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

LMHA has adopted an Emergency VAWA Transfer Plan. LMHA is a member of the Domestic Violence Awareness Task Force. LMHA collaborates with local community agencies providing services and programs related to domestic violence, dating violence, sexual assault, or stalking to ensure that current information and all informational community programs are available to applicants, residents and staff. The following local organizations offer assistance to victims:

El Centro de Servicios Sociales Inc. 2800 Pearl Avenue Lorain, Ohio 44055 440.277.8235	Genesis House (Lorain County Safe Harbor) PO Box 718 Lorain, OH 44052 24-hour Hotline: 440.244.1853; 440.323.3400	Pathways Counseling & Growth Center 312 Third Street Elyria, OH 44035 440.323.5707
Lorain County Board of Mental Health 1173 North Ridge Road, East Lorain, OH 44055 440.233.2020 24/7 Emergency/Crisis Hotline: 800.888.6161	Nord Center 6140 South Broadway Avenue Lorain, OH 44053 24/7 Emergency/Crisis Hotline: 800.888.6161 Sexual Assault Services Hotline: 440.204.4359	Far West Center/Amherst 554 N. Leavitt Road Amherst, OH 44001 440.988.4900
Far West Center/Westlake 29133 Health Campus Drive Westlake, OH 44145 440.835.6212		

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

B.1b

Pet Policy

Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))
The LMHA Pet Policy is Chapter 10 in the ACOP.

LMHA proposes the following changes to the PH Pet Policy: Reduce pet deposits for family developments from \$400 to \$300. LMHA will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit or any other balances owed, within 30 days of move-out or removal of the pet from the unit after an inspection is conducted to determine any damages caused by the pet. A separate pet waste removal charge of \$10.00 per occurrence will be assessed against pet owners who fail to remove pet waste in accordance with this policy.

Asset Management

State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. ([24 CFR §903.7\(q\)](#))

In 2014, LMHA conducted a Green Physical Needs Assessment (GPNA) and Energy Audit. LMHA uses the GPNA tool to assistance in prioritization of capital projects and cost estimating. All short-term needs identified in the GPNA were added to the CFP 5-Year Action Plan if not already included. Strategic, long-range plans, including substantial renovation, demolition, deconcentration and redevelopment, were developed for properties identified as functionally obsolete.

A market study was conducted in 2013 to determine the affordable housing needs of the residents of Lorain County, in particular the needs of the elderly and disabled. Several public forums were held in the cities of Lorain and Elyria to discuss the results of the study. Master Plans for redevelopment of public housing family developments, Southside Gardens in Lorain and Wilkes Villa in Elyria, were created with input from the public, residents of the properties, city officials, and LMHA employees.

Due to the lack of sufficient capital funding to complete all high-priority capital improvement projects at all properties, the priorities must be refined even further. This ensures that projects which impact health and safety issues, integrity of critical building systems, and long-term viability of structures are performed first. These decisions are based not only on the GPNA but also upon results of UPCS inspections and input from COCC administrators, site management, site staff, and resident surveys or meetings.

LMHA is intent upon implementing its Master Plans for Redevelopment of Southside Gardens and Wilkes Villa. It is likely to take years to overcome the challenge of financing multi-million dollar projects. It is necessary to maintain the properties to ensure they remain safe, sanitary and decent. In calendar years 2015 and 2016, LMHA invested over \$1 million in interior improvements, basement repairs, and water infiltration control at Southside Gardens. This work will sustain the viability of the property for a number of years as financing is sought and the project is approved for construction.

The Housing Authority has also determined to address the accessible needs of the community by implementing visitability and universal design concepts in its projects. LMHA has prudently and assertively worked towards attaining its Section 504 goals.

LMHA will continually review its AMP structures to best serve the Housing Authority's development activities and efficiencies of operations.

The current plans for modernization activities are included in the agency's Annual Statement and Five-Year Action Plan.

Substantial Deviation

PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Lorain Metropolitan Housing Authority (OH012) has defined a significant amendment/modification to the CFP Five Year Action Plan as follows:

- a proposed demolition, disposition, homeownership, Capital Fund Financing, development or mixed finance proposal are considered significant amendments to the CFP 5-Year Action Plan
- additions of non-emergency work items (work items not included in the current Annual Statement or 5-Year Action Plan) are significant amendments/modifications to the CFP 5-Year Action Plan
- change in the use of replacement reserve funds under the Capital Fund Program are significant amendments/modifications to the CFP 5-Year Action Plan

An exception to these definitions will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements; such changes will not be considered significant amendments by HUD.

Significant Amendment/Modification

PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

The definition of "significant amendment/modification" to the PHA 5-Year and Annual Plan adopted by Lorain Metropolitan Housing Authority is:

- any changes to the rent or admissions policies which require a Board resolution to implement
- organization of the waiting list
- additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan)
- any change with regard to demolition or disposition, designation, homeownership programs or conversion activities

An exception to these definitions will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements; such changes will not be considered significant amendments by HUD.

B.1c (c) The PHA must submit its Deconcentration Policy for Field Office review.

Deconcentration Policy of Lorain Metropolitan Housing Authority

The Quality Housing and Work Responsibility Act of 1998 (QHWRA) permits the PHA to consider a number of approaches to achieve the goals of deconcentration and income mixing, such as skipping over certain families on the waiting lists based on income; the establishment of certain preferences, such as working preferences; additional applicant consultation and information; and rent incentives authorized by QHWRA.

LMHA discontinued the use of all local preferences effective April 1, 2016.

As an incentive to employed individuals, LMHA will grant a permissive deduction to working families for medical insurance premiums withheld from the employed applicant's/resident's gross pay.

LMHA has established flat rent amounts for units based on bedroom size. By offering a Public Housing applicant the choice of paying thirty percent (30%) of adjusted income or a flat rate based upon the size unit needed, LMHA hopes to attract the working families in need of affordable housing.

LMHA conducts an annual deconcentration of poverty and income mixing analysis in accordance with 24 CFR Part 903Subpart A. This evaluation compares the average annual unadjusted household income of each individual development to the average annual unadjusted income of all LMHA households. In determining average income for each development, LMHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

LMHA will determine whether each of its developments falls above, below or within the Established Income Range (EIR) [as defined in 24 CFR 903.2(c)(1)(iii)]. The EIR is from 85% to 115% (inclusive) of the overall LMHA-wide average family income.

If a PHA property has an average family income outside the high or low ranges of the EIR, LMHA may provide an explanation to justify the income profile for these developments [refer to 24 CFR 903.2(c)(1)(iv)]. If the income profile is not justified, the LMHA shall include in its policies its procedures to provide for deconcentration of poverty and income mixing. LMHA's deconcentration policy is to undertake, in conjunction with other efforts, attempts to increase self sufficiency of current residents to raise their incomes rather than adjusting admissions policies or criteria.

LMHA may also target investment and capital improvements toward developments with an average income below the EIR to encourage applicant families whose income is above the Established Income Range to accept units in those developments.

For properties with average incomes below EIR, LMHA has chosen a strategy of working with current households to raise their incomes rather than adjusting admissions policies or criteria. LMHA will target the properties with high percentages of zero-income households and which have an average household income below 85% of the PHA average.

Revised July 2015; April 1, 2016; July 2016

Board resolution 8402-99; 6-16-99

Deconcentration Statistics

In calendar year 2013, there were three (3) properties below the EIR, namely Wilkes Villa (\$1331 below EIR), Westview Terrace (\$19 below EIR) and Westgate Apartments (\$2324 below EIR).

In calendar year 2014, LMHA had no properties with average family incomes above the EIR and two (2) properties with average family incomes below the EIR: Wilkes Villa (\$566.37 below EIR) and Lakeview Plaza (\$208 below EIR). At Wilkes Villa, more than 28% of the households have zero income. At Lakeview Plaza (a high rise consisting of 0- and 1-bedroom units), more than 23% of the households have zero income.

In calendar year 2015, the EIR range was \$7453 to \$10,084, with the average family income PHA-wide of \$8769. There were no properties with average family incomes above the EIR. There were three (3) properties with average family incomes below the EIR: Westview Terrace (\$31 below, 22% had zero income), Westgate Apartments (\$4607 below, 33% with zero income), and Lakeview Plaza (\$188 below, 26% with zero income).

In calendar year 2016, the EIR range was \$7962 to \$10,772 with the average annual family income PHA-wide of \$9367. There were 2 properties with average annual family incomes below EIR: Leavitt Homes: (\$1104 below EIR), with 56 households (29%) having zero income and 81 adults with Community Service requirements. Westgate Apartments (\$3894 below EIR), with 4 of 11 households having zero income, 7 have an average income of \$4068, & 5 adults have Community Service requirements. With only 12 units, the averages are easily skewed by only a few families.

In calendar year 2017, the EIR range was \$8013 to \$11, 134, with average annual family income PHA-wide of \$9246. No properties were above EIR. One property was below EIR: Wilkes Villa, average annual family income of \$8004, was \$9 below the PHA-wide EIR.

In 2014, 92% of applicants for public housing were Extremely Low Income (ELI).

In 2015, 97% of applicants for public housing were ELI.

In 2016, 93% of applicants for public housing were ELI; 19% of PH households have zero income.

In 2017, 98% of applicants for public housing were ELI; 19.5% of PH households have zero income.

To address deconcentration issues, LMHA has chosen a strategy of working with current households to raise their incomes rather than adjusting admissions policies or criteria. With more than 90% of the public housing households being ELI, 19.5% having zero income, and none of the public housing properties being above the high end of the EIR, there are no opportunities to transfer higher income residents to lower income properties.

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

- ☒ ☐ Hope VI or Choice Neighborhoods.
- ☒ ☐ Mixed Finance Modernization or Development.
- ☐ ☒ Demolition and/or Disposition.
- ☐ ☒ Designated Housing for Elderly and/or Disabled Families.
- ☐ ☒ Conversion of Public Housing to Tenant-Based Assistance.
- ☐ ☒ Conversion of Public Housing to Project-Based Assistance under RAD.
- ☐ ☒ Occupancy by Over-Income Families.
- ☐ ☒ Occupancy by Police Officers.
- ☒ ☐ Non-Smoking Policies.
- ☒ ☐ Project-Based Vouchers.
- ☐ ☒ Units with Approved Vacancies for Modernization.
- ☐ ☒ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

CHOICE NEIGHBORHOODS

1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals.

LMHA intends to submit an application for a Choice Neighborhoods Planning Grant for redevelopment planning for Southside Gardens (OH012-13 and OH012-14) for approximately 105 units. The planning grant is likely to have an application deadline in August, 2018.

Mixed Finance Modernization or Development

No Mixed Finance Modernization is planned. However, LMHA may opt to apply for either 4% or 9% credits Low Income Housing Tax Credits (LIHTC) and prepare Mixed Finance Applications for the redevelopment activities planned for the 174 units at Wilkes Villa (OH012-003) and the 108 units at Southside Gardens (OH012-013 and OH12-014). A Mixed Finance Project was completed in 2013 (details follow). Development activities are planned.

MIXED FINANCE MODERNIZATION: LMHA Oberlin Homes Low Income Housing Tax Credit (LIHTC) units

LMHA was awarded Low Income Housing Tax Credits (LIHTC) for the preservation of low income housing units by substantially renovating 52 of 54 scattered site public housing "pagoda" units in LMHA's AMP 4 (OH012000004) in the City of Oberlin. The project consisted of the renovation of 41 buildings comprised of detached homes and duplex buildings. The project resulted in 20 two-bedroom duplex units, 27 three-bedroom detached homes, and 4 four-bedroom detached homes. Nine of the 51 units (or 18%) are fully accessible for the mobility impaired, and an additional two units (or 4%) will be equipped for sensory impaired residents. All units were renovated following principles of Universal Design, making all units visitable.

The project scope included an interior re-design plus the removal of existing roofs and rebuilding of new style gable or hip roofs. Specifically, the work included replacement of windows, complete kitchen and bath renovation, replacement of existing floor coverings, and the replacement of plumbing, electrical, and HVAC systems with energy efficient systems. Exterior work included the replacement of existing storage sheds, new concrete drives, replacement of concrete stoops and walks, landscaping and back yard drainage.

LMHA allocated \$1.5 million of 2011 Capital Fund Program funding for this project (budget line item 1499 Development Activities). The project is a public/private partnership between the Lorain Metropolitan Housing Authority and NRP Holdings LLC, who served as co-developers of the project under 24 CFR Part 941, Subpart F, Mixed Finance Development.

LMHA submitted to HUD's Special Applications Center (SAC) an application for disposition (i.e., Inventory Removal Application) for the 52 units, the application was approved on June 26, 2012. The disposition is in the best interests of the residents and the LMHA because it improved the quality of public housing in the community. Furthermore, the disposition of this property enabled the property to be developed pursuant to a mixed-finance development method under 24 CFR 941 Subpart F. The improvements on the property were sold and the land ground leased to LMHA Oberlin Homes LLC, a partnership composed of a non-profit instrumentality of the Lorain Metropolitan Housing Authority known as LMHA Oberlin Homes MM LLC and an investor member. All units will remain as public housing.

The units approved for disposition are:

- Twenty-two 2-bedroom units: 166/168 N. Park St.; 126/128/226/228 S. Park St.; 65/67/70/72/76/78 Berger Ct.; 121/123 S. Pleasant St.; 201/203/221/223 Groveland St.; 118/120/124/126 E. Vine St.
- Twenty-six 3-bedroom units: 160 N. Park St.; 112/120/210/216/220/234 S. Park St.; 54/56/57/64/73/75/83 Berger Ct.; 109/115 S. Pleasant St.; 142/148/197/213/227 Groveland St.; 119 Locust St.; 8 Edison; 7/13/21 W. Lincoln St.
- Four 4-bedroom units: 51/86 Berger Ct.; 204 S. Park St.; 207 Groveland St.

The 2-bedroom duplex at 76-78 Berger Ct. was merged into one detached 4-bedroom fully accessible unit, resulting in the reduction of the number of units from 52 to 51.

Two of the 54 units not included in the renovation project are 3-bedroom fully-accessible ranches. 106 South Park Street was rebuilt in 2004. 358 South Main Street was substantially renovated using Capital Fund Program funding in 2010 and served as the prototype for the renovation of the 52 remaining units. These two units remain as Public Housing units in LMHA's AMP 4 (OH012000004).

LMHA submitted an application for Mixed Finance Modernization in fiscal year 2013. LMHA shall not enter into any long-term ground lease or deed of sale for this disposition without HUD's prior written approval of the evidentiary submission for a mixed-finance transaction as set forth in 24 CFR Part 941, Subpart F. The property, LMHA Oberlin Homes, was placed in service December 7, 2012. HUD approved the evidentiary submission of the mixed-finance proposal on March 22, 2013. Full occupancy was attained on November 26, 2013. LMHA Oberlin Homes MM LLC is responsible for the management of the property.

DEVELOPMENT ACTIVITIES:

Master Plans for Wilkes Villa and Southside Gardens Redevelopment

Utilizing insurance proceeds received as a result of fires and which are presently retained in the public housing operating reserves, LMHA competitively procured the services of two independent redevelopment consultants/urban architects/land-use planners to create master plans for the redevelopment of Wilkes Villa and Southside Gardens. The consultants assisted LMHA administrators in generating a long-term plan for redevelopment of the properties with the goals of deconcentration of the site and construction of new residential units as funds are obtained. The consultants may also design and oversee construction of prototype units, the quantity of which shall be determined by the amount of funding available. The prototype units will serve as the cornerstone of future redevelopment of the properties.

At Wilkes Villa, the consultant will also assist LMHA in determining the potential use for LMHA-owned parcels of land adjacent to the public housing development. It may be feasible to use the undeveloped land for residential units or for green space, parking lots and non-residential structures. Acquisition Proposals were submitted to HUD to bring these parcels under the footprint of the Wilkes Villa development.

LMHA used Capital Funds for the A/E and consultant to design and oversee construction of a new management and maintenance facility and to renovate the existing management/community building at Wilkes Villa. One half of the existing building has been renovated as a medical facility to serve the needs of the residents and the public, in addition to the existing childcare facility. A new Management/Maintenance Facility was completed in 2015.

Submission of Development Proposals for Wilkes Villa in 2013

LMHA submitted to HUD a Development Proposal in accordance with 24 CFR Part 941 for the redevelopment of Wilkes Villa. A Proposal for Phase II was submitted for the construction of a prototype unit at Wilkes Villa to demonstrate the construction design intended for the future property. The townhouse will be constructed on the site where an 8-unit 32-bedroom building had been located (i.e. 174-188 Pratt Blvd, Elyria) but was destroyed by fire on September 13, 2011 and subsequently demolished. LMHA intends to fund the project with Capital Funds, and, if permissible, available and necessary, the insurance proceeds from the fire plus Capital Funds. Phase I included the construction of a new Management/Maintenance facility and renovation of the existing Management/Maintenance building to provide space for a health care center operated by Lorain County Health & Dentistry to serve the residents of Wilkes Villa and the surrounding community. The new construction and renovations were funded by Capital Funds and were completed in 2015.

Submission of Development Proposals for Southside Gardens in 2013

LMHA submitted to HUD a Development Proposal in accordance with 24 CFR Part 941 for the redevelopment of Southside Gardens. A Proposal for Phase I was submitted for the construction of a prototype unit at Southside Gardens to demonstrate the construction design intended for the future property. The townhouse was leased up in May 2017 on the site where two single family public housing units had been located (i.e., 1555 and 1557 East 30th Street, Lorain) but had been demolished due to functional obsolescence. LMHA funded the project with Capital Funds.

In calendar years 2015, 2016, and 2017, LMHA invested over \$1 million in interior improvements, basement repairs, water infiltration control, and roof repairs/replacement at Southside Gardens. These projects will sustain the viability of the property for a number of years as the challenge of financing the redevelopment of the property is sought and the project is approved for construction.

Submission of future Development Proposals

In fiscal year 2019, LMHA may submit to HUD Development Proposals for the redevelopment of the remainder of Wilkes Villa and Southside Gardens in accordance with the Master Plans for both properties. The Development proposal for Wilkes Villa will rely heavily upon the approval of the acquisition proposals for the vacant parcels described below. The redevelopment of the properties may need to be completed in phases based upon the availability of funding.

Submission of Site Acquisition Proposals in 2014

On June 6, 2014, LMHA submitted Acquisition Proposals to HUD in accordance with 24 CFR Part 905.600 Subpart F to obtain parcels of land immediately adjacent to or within its property boundaries:

Wilkes Villa: LMHA will pursue acquisition of park land currently owned by the City of Elyria. This parcel (#10-00-004-122-034) is between the Wilkes Villa Management Office and the building containing 102-116 White Court. This land will be essential for the redevelopment of Wilkes Villa.

Wilkes Villa: On June 6, 2014, LMHA submitted an Acquisition Proposal to HUD to add to the Wilkes Villa property 7 parcels of land owned by LMHA which were purchased at Sheriff's auction: Parcel numbers 10-00-004-122-001; 10-00-004-122-006; 10-00-004-122-007; 10-00-004-122-010; 10-00-004-122-011; 10-00-004-122-012; 10-00-004-122-023. These parcels are adjacent to the western boundary of Wilkes Villa and will be necessary for the future redevelopment of Wilkes Villa to enlarge the footprint of the property, to enable construction of residential units, to reduce the concentration of units per acre, to facilitate phasing of construction, and ease the impact of relocation of residents. An additional parcel of land with frontage on Fuller Road (226 Fuller Road, Elyria) owned by LMHA's Other Business Activities is not part of the AMP (parcel #10-00-004-123-001). This parcel was included in the acquisition proposal.

B.2b

Lakeview Plaza: On June 6, 2014, LMHA submitted to HUD an Acquisition Proposal to acquire 701 Sixth Street, Lorain (parcel #02-01-005-113-018) for the purposes of a parking lot. This parcel is presently owned by LMHA's Other Business Activities.

Riverview Plaza: On June 6, 2014, LMHA submitted to HUD an Acquisition Proposal to acquire 317 & 319 East Avenue, Elyria (parcels #06-26-048-000-018 & b06-26-048-000-019, respectively) for the purposes of a parking lot. These parcels are presently owned by LMHA's Other Business Activities (OBA).

Timetables for submission of proposals Development Proposals as described above for both Wilkes Villa and Southside Gardens were submitted to HUD November 21, 2013. Site Acquisition proposals for the parcels for Leavitt Homes, Westview Terrace, Lakeview Plaza and Riverview Plaza were submitted June 6, 2014 and are pending approval.

LMHA may submit the Wilkes Villa and Southside Gardens Development Proposals for redevelopment of the entire properties in fiscal year 2018.

LMHA applied for a Choice Neighborhood Planning Grant in August 2014 which, if it had been awarded, would have been used to create a Transformation Plan for the redevelopment of the neighborhood of South Lorain, including Southside Gardens. LMHA would then apply for a Choice Neighborhood Implementation Grant to assist with financing the redevelopment of Southside Gardens. LMHA may consider applying for a future Choice Neighborhood planning grant.

Submission of Mixed Finance Applications for Wilkes Villa (OH012-003) & Southside Gardens (OH012-013/OH012-014)

LMHA may consider applying for Low Income Housing Tax Credits through the Ohio Housing Finance Agency for the 2019 Qualified Allocation Plan (QAP) for redevelopment of Wilkes Villa (OH012-003) and/or Southside Gardens (OH012-013/014)

NON-SMOKNG POLICIES

The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects.

LMHA is implementing non-smoking policies at all of its owned and managed properties effective May 1, 2018.

PROJECT BASED VOUCHERS

Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

LMHA intends to operate a project-based voucher program and work with community partners to identify specific target populations to be served through project-based vouchers. The agency may issue RFPs in the coming year to utilize up to 300 vouchers. LMHA may also consider applications outside the RFP process consistent with the LMHA Administrative Plan. LMHA has tentatively determined that up to 300 vouchers could be project-based in the Plan year.

The project based vouchers would be used to convert two existing public housing developments to project based section 8 to preserve affordable housing in the Cities of Lorain and Elyria. Southside Gardens in Lorain and Wilkes Villa in Elyria are two public housing developments which have become functionally obsolete. It has been determined the properties exceed HUD thresholds for rehabilitation and need to be replaced.

It is anticipated that Southside Gardens would require approximately 105 vouchers and Wilkes Villa 150.

The Authority proposes to apply for 2019 Low Income Housing Tax Credit funding to preserve affordable housing. In addition to these projects, the Authority will issue project based vouchers for projects that create affordable housing in areas of lower concentration of poverty in Lorain County, which would be consistent with the deconcentration policy of the LMHA Annual Plan.

The Authority may issue project based vouchers to developer(s) who assist homeless persons or who have one or more disabling conditions that complicate their ability to find and maintain housing."

B.2b

Demolition and/or Disposition

As part of the Master Plans and Development Proposals, LMHA will need to submit a Demolition Application to HUD's Special Application Center (SAC) for the demolition of all housing units at Wilkes Villa (OH012-003 in AMP 3 OH012000003) which remain after the construction of the Master Plan Prototype units. None of these units have accessible features. The units designated for demolition are:

Wilkes Villa OH012-003**24 buildings, 174 units;****Construction Date: 8/31/1971**

Bldg nos.	PIC Bldg No.	Location	Building Type	No. BR
1	003001	304 FULLER ST. ELYRIA	Row or Townhouse	2
1	003001	306 FULLER ST. ELYRIA	Row or Townhouse	2
1	003001	308 FULLER ST. ELYRIA	Row or Townhouse	2
1	003001	310 FULLER ST. ELYRIA	Row or Townhouse	2
1	003001	312 FULLER ST. ELYRIA	Row or Townhouse	2
1	003001	314 FULLER ST. ELYRIA	Row or Townhouse	2
1	003001	316 FULLER ST. ELYRIA	Row or Townhouse	2
1	003001	318 FULLER ST. ELYRIA	Row or Townhouse	2
2	003003	102 WHITE CT. ELYRIA	Row or Townhouse	6
2	003003	104 WHITE CT. ELYRIA	Row or Townhouse	3
2	003003	106 WHITE CT. ELYRIA	Row or Townhouse	3
2	003003	108 WHITE CT. ELYRIA	Row or Townhouse	3
2	003003	110 WHITE CT. ELYRIA	Row or Townhouse	3
2	003003	112 WHITE CT. ELYRIA	Row or Townhouse	3
2	003003	114 WHITE CT. ELYRIA	Row or Townhouse	3
2	003003	116 WHITE CT. ELYRIA	Non-Dwelling Unit	6 - B&G club
3	003004	161 PRATT BLVD. ELYRIA	Row or Townhouse	2
3	003004	163 PRATT BLVD. ELYRIA	Row or Townhouse	2
3	003004	165 PRATT BLVD. ELYRIA	Row or Townhouse	2
3	003004	167 PRATT BLVD. ELYRIA	Row or Townhouse	2
3	003004	169 PRATT BLVD. ELYRIA	Row or Townhouse	2
3	003004	171 PRATT BLVD. ELYRIA	Row or Townhouse	2
3	003004	173 PRATT BLVD. ELYRIA	Row or Townhouse	2
3	003004	175 PRATT BLVD. ELYRIA	Row or Townhouse	2
4	003005	119 PORTIA CT. ELYRIA	Row or Townhouse	2
4	003005	121 PORTIA CT. ELYRIA	Row or Townhouse	2
4	003005	123 PORTIA CT. ELYRIA	Row or Townhouse	2
4	003005	125 PORTIA CT. ELYRIA	Row or Townhouse	2
4	003005	127 PORTIA CT. ELYRIA	Row or Townhouse	2
4	003005	129 PORTIA CT. ELYRIA	Row or Townhouse	2
4	003005	131 PORTIA CT. ELYRIA	Row or Townhouse	2
4	003005	133 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	136 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	138 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	140 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	142 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	144 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	146 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	148 PORTIA CT. ELYRIA	Row or Townhouse	2
5	003006	150 PORTIA CT. ELYRIA	Row or Townhouse	2

B.2b	Wilkes Villa OH012-003 units designated for demolition (continued)				
	Bldg nos.	PIC Bldg No.	Location	Building Type	No. BR
	6	003007	103 PORTIA CT. ELYRIA	Row or Townhouse	2
	6	003007	105 PORTIA CT. ELYRIA	Row or Townhouse	2
	6	003007	107 PORTIA CT. ELYRIA	Row or Townhouse	2
	6	003007	109 PORTIA CT. ELYRIA	Row or Townhouse	2
	6	003007	111 PORTIA CT. ELYRIA	Row or Townhouse	2
	6	003007	113 PORTIA CT. ELYRIA	Row or Townhouse	2
	6	003007	115 PORTIA CT. ELYRIA	Row or Townhouse	2
	6	003007	117 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	120 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	122 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	124 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	126 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	128 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	130 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	132 PORTIA CT. ELYRIA	Row or Townhouse	2
	7	003008	134 PORTIA CT. ELYRIA	Row or Townhouse	2
	8	003009	104 PORTIA CT. ELYRIA	Row or Townhouse	4
	8	003009	106 PORTIA CT. ELYRIA	Row or Townhouse	4
	8	003009	108 PORTIA CT. ELYRIA	Row or Townhouse	4
	8	003009	110 PORTIA CT. ELYRIA	Row or Townhouse	4
	8	003009	112 PORTIA CT. ELYRIA	Row or Townhouse	4
	8	003009	114 PORTIA CT. ELYRIA	Row or Townhouse	4
	8	003009	116 PORTIA CT. ELYRIA	Row or Townhouse	4
	8	003009	118 PORTIA CT. ELYRIA	Row or Townhouse	4
	10	003011	103 HODGE CT. ELYRIA	Row or Townhouse	2
	10	003011	105 HODGE CT. ELYRIA	Row or Townhouse	2
	10	003011	107 HODGE CT. ELYRIA	Row or Townhouse	2
	10	003011	109 HODGE CT. ELYRIA	Row or Townhouse	2
	10	003011	111 HODGE CT. ELYRIA	Row or Townhouse	2
	10	003011	113 HODGE CT. ELYRIA	Row or Townhouse	2
	10	003011	115 HODGE CT. ELYRIA	Row or Townhouse	2
	10	003011	117 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	119 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	120 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	121 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	122 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	123 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	124 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	125 HODGE CT. ELYRIA	Row or Townhouse	2
	11	003012	126 HODGE CT. ELYRIA	Row or Townhouse	2

B.2b	Wilkes Villa OH012-003 units designated for demolition (continued)				
	Bldg nos.	PIC Bldg No.	Location	Building Type	No. BR
	12	003014	142 PRATT BLVD. ELYRIA	Row or Townhouse	6
	12	003014	144 PRATT BLVD. ELYRIA	Row or Townhouse	3
	12	003014	146 PRATT BLVD. ELYRIA	Row or Townhouse	3
	12	003014	148 PRATT BLVD. ELYRIA	Row or Townhouse	3
	12	003014	150 PRATT BLVD. ELYRIA	Row or Townhouse	3
	12	003014	152 PRATT BLVD. ELYRIA	Row or Townhouse	3
	12	003014	154 PRATT BLVD. ELYRIA	Row or Townhouse	3
	12	003014	156 PRATT BLVD. ELYRIA	Row or Townhouse	6
	13	003015	101 TEDMAN CT. ELYRIA	Row or Townhouse	3
	13	003015	103 TEDMAN CT. ELYRIA	Row or Townhouse	3
	13	003015	105 TEDMAN CT. ELYRIA	Row or Townhouse	3
	13	003015	107 TEDMAN CT. ELYRIA	Row or Townhouse	3
	13	003015	109 TEDMAN CT. ELYRIA	Row or Townhouse	3
	13	003015	111 TEDMAN CT. ELYRIA	Row or Townhouse	3
	13	003015	113 TEDMAN CT. ELYRIA	Row or Townhouse	3
	13	003015	115 TEDMAN CT. ELYRIA	Row or Townhouse	3
	14	003016	129 TEDMAN CT. ELYRIA	Row or Townhouse	1
	14	003016	131 TEDMAN CT. ELYRIA	Row or Townhouse	1
	14	003016	133 TEDMAN CT. ELYRIA	Row or Townhouse	1
	14	003016	135 TEDMAN CT. ELYRIA	Row or Townhouse	1
	14	003016	137 TEDMAN CT. ELYRIA	Row or Townhouse	1
	14	003016	139 TEDMAN CT. ELYRIA	Row or Townhouse	1
	15	003017	117 TEDMAN CT. ELYRIA	Row or Townhouse	3
	15	003017	119 TEDMAN CT. ELYRIA	Row or Townhouse	3
	15	003017	121 TEDMAN CT. ELYRIA	Row or Townhouse	3
	15	003017	123 TEDMAN CT. ELYRIA	Row or Townhouse	3
	15	003017	125 TEDMAN CT. ELYRIA	Row or Townhouse	3
	15	003017	127 TEDMAN CT. ELYRIA	Row or Townhouse	3
	16	003018	130 TEDMAN CT. ELYRIA	Row or Townhouse	2
	16	003018	132 TEDMAN CT. ELYRIA	Row or Townhouse	2
	16	003018	134 TEDMAN CT. ELYRIA	Row or Townhouse	2
	16	003018	136 TEDMAN CT. ELYRIA	Row or Townhouse	2
	16	003018	138 TEDMAN CT. ELYRIA	Row or Townhouse	2
	16	003018	140 TEDMAN CT. ELYRIA	Row or Townhouse	2
	16	003018	142 TEDMAN CT. ELYRIA	Row or Townhouse	2
	16	003018	144 TEDMAN CT. ELYRIA	Row or Townhouse	2

B.2b	Wilkes Villa OH012-003 units designated for demolition (continued)				
	Bldg nos.	PIC Bldg No.	Location	Building Type	No. BR
	17	003019	114 TEDMAN CT. ELYRIA	Row or Townhouse	3
	17	003019	116 TEDMAN CT. ELYRIA	Row or Townhouse	3
	17	003019	118 TEDMAN CT. ELYRIA	Row or Townhouse	3
	17	003019	120 TEDMAN CT. ELYRIA	Row or Townhouse	3
	17	003019	122 TEDMAN CT. ELYRIA	Row or Townhouse	3
	17	003019	124 TEDMAN CT. ELYRIA	Row or Townhouse	3
	17	003019	126 TEDMAN CT. ELYRIA	Row or Townhouse	3
	17	003019	128 TEDMAN CT. ELYRIA	Row or Townhouse	3
	18	003020	103 BOHANNON CT. ELYRIA	Row or Townhouse	3
	18	003020	105 BOHANNON CT. ELYRIA	Row or Townhouse	3
	18	003020	107 BOHANNON CT. ELYRIA	Row or Townhouse	3
	18	003020	109 BOHANNON CT. ELYRIA	Row or Townhouse	3
	18	003020	111 BOHANNON CT. ELYRIA	Row or Townhouse	3
	18	003020	113 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	115 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	117 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	119 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	121 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	123 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	125 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	127 BOHANNON CT. ELYRIA	Row or Townhouse	3
	19	003021	129 BOHANNON CT. ELYRIA	Row or Townhouse	3
	20	003022	131 BOHANNON CT. ELYRIA	Row or Townhouse	2
	20	003022	133 BOHANNON CT. ELYRIA	Row or Townhouse	2
	20	003022	135 BOHANNON CT. ELYRIA	Row or Townhouse	2
	20	003022	137 BOHANNON CT. ELYRIA	Row or Townhouse	2
	20	003022	139 BOHANNON CT. ELYRIA	Row or Townhouse	2
	20	003022	141 BOHANNON CT. ELYRIA	Row or Townhouse	2
	20	003022	143 BOHANNON CT. ELYRIA	Row or Townhouse	2
	20	003022	145 BOHANNON CT. ELYRIA	Row or Townhouse	2
	21	003023	156 BOHANNON CT. ELYRIA	Row or Townhouse	5
	21	003023	158 BOHANNON CT. ELYRIA	Row or Townhouse	5
	21	003023	160 BOHANNON CT. ELYRIA	Row or Townhouse	5
	21	003023	162 BOHANNON CT. ELYRIA	Row or Townhouse	5
	21	003023	164 BOHANNON CT. ELYRIA	Row or Townhouse	5
	21	003023	166 BOHANNON CT. ELYRIA	Row or Townhouse	5

B.2b	Wilkes Villa OH012-003 units designated for demolition (continued)					
	Bldg nos.	PIC Bldg No.	Location	Building Type	No. BR	
	22	003024	144 BOHANNON CT. ELYRIA	Row or Townhouse	3	
	22	003024	146 BOHANNON CT. ELYRIA	Row or Townhouse	3	
	22	003024	148 BOHANNON CT. ELYRIA	Row or Townhouse	3	
	22	003024	150 BOHANNON CT. ELYRIA	Row or Townhouse	3	
	22	003024	152 BOHANNON CT. ELYRIA	Row or Townhouse	3	
	22	003024	154 BOHANNON CT. ELYRIA	Row or Townhouse	3	
	23	003025	116 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	23	003025	118 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	23	003025	120 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	23	003025	122 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	23	003025	124 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	23	003025	126 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	24	003026	128 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	24	003026	130 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	24	003026	132 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	24	003026	134 BOHANNON CT. ELYRIA	Row or Townhouse	4	
	25	003027	102 PRATT BLVD. ELYRIA	Row or Townhouse	5	
	25	003027	104 PRATT BLVD. ELYRIA	Row or Townhouse	5	
	25	003027	106 PRATT BLVD. ELYRIA	Row or Townhouse	5	
	25	003027	108 PRATT BLVD. ELYRIA	Row or Townhouse	5	
	25	003027	110 PRATT BLVD. ELYRIA	Row or Townhouse	5	
	25	003027	112 PRATT BLVD. ELYRIA	Row or Townhouse	5 - COPS UNIT	
	B.2b	As part of the Master Plans and Development Proposals, LMHA will need to submit a Demolition Application to HUD’s Special Application Center (SAC) for the demolition of all housing units in the two (2) developments of Southside Gardens (OH012-013 and OH012-014 in AMP OH012000004) which remain after the construction of the Master Plan Prototype units. None of these units have accessible features. The units designated for demolition are:				
		Southside Gardens OH012-13; 20 buildings, 50 units; Construction Date: 1/31/1972				
		Bldg nos.	PIC Bldg No.	Address	Building Type	No. BR
48		013001	1613 E. 30TH ST. LORAIN	Single Family/Detached	6	
49		013002	1615 E. 30TH ST. LORAIN	Row or Townhouse	3	
		013002	1617 E. 30TH ST. LORAIN	Row or Townhouse	3	
		013002	1619 E. 30TH ST. LORAIN	Row or Townhouse	3	
		013002	1621 E. 30TH ST. LORAIN	Row or Townhouse	3	
50		013003	1610 E. 29TH ST. LORAIN	Row or Townhouse	2	
		013003	1612 E. 29TH ST. LORAIN	Row or Townhouse	2	
		013003	1614 E. 29TH ST. LORAIN	Row or Townhouse	2	
	013003	1616 E. 29TH ST. LORAIN	Row or Townhouse	2		
51	013004	1618 E. 29TH ST. LORAIN	Semi Detached	4		
	013004	1620 E. 29TH ST. LORAIN	Semi Detached	4		

B.2b

Southside Gardens OH012-13 units designated for demolition (continued)

Bldg nos.	PIC Bldg No.	Address		Building Type	No. BR
52	013005	1622 E. 29TH ST.	LORAIN	Single Family/Detached	5
53	013006	1624 E. 29TH ST.	LORAIN	Single Family/Detached	5
54	013007	1623 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013007	1625 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013007	1627 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013007	1629 E. 30TH ST.	LORAIN	Row or Townhouse	2
55	013008	1634 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013008	1636 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013008	1638 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013008	1640 E. 30TH ST.	LORAIN	Row or Townhouse	2
56	013009	1642 E. 30TH ST.	LORAIN	Row or Townhouse	3
	013009	1644 E. 30TH ST.	LORAIN	Row or Townhouse	3
	013009	1646 E. 30TH ST.	LORAIN	Row or Townhouse	3
	013009	1648 E. 30TH ST.	LORAIN	Row or Townhouse	3
57	013010	1650 E. 30TH ST.	LORAIN	Single Family/Detached	5
58	013011	1652 E. 30TH ST.	LORAIN	Single Family/Detached	6
59	013012	1654 E. 30TH ST.	LORAIN	Row or Townhouse	4
	013012	1656 E. 30TH ST.	LORAIN	Row or Townhouse	4
	013012	1658 E. 30TH ST.	LORAIN	Row or Townhouse	4
	013012	1660 E. 30TH ST.	LORAIN	Row or Townhouse	4
60	013013	1662 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013013	1664 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013013	1666 E. 30TH ST.	LORAIN	Row or Townhouse	2
	013013	1668 E. 30TH ST.	LORAIN	Row or Townhouse	2
61	013014	1681 E. 30TH ST.	LORAIN	Single Family/Detached	6
62	013015	1680 E. 29TH ST.	LORAIN	Single Family/Detached	6
63	013016	1682 E. 29TH ST.	LORAIN	Single Family/Detached	5
64	013017	1684 E. 29TH ST.	LORAIN	Row or Townhouse	2
	013017	1686 E. 29TH ST.	LORAIN	Row or Townhouse	2
	013017	1688 E. 29TH ST.	LORAIN	Row or Townhouse	2
	013017	1690 E. 29TH ST.	LORAIN	Row or Townhouse	2
65	013018	1692 E. 29TH ST.	LORAIN	Semi Detached	4
	013018	1694 E. 29TH ST.	LORAIN	Semi Detached	4
66	013019	1691 E. 30TH ST.	LORAIN	Semi Detached	4
	013019	1693 E. 30TH ST.	LORAIN	Semi Detached	4
67	013020	1683 E. 30TH ST.	LORAIN	Row or Townhouse	3
	013020	1685 E. 30TH ST.	LORAIN	Row or Townhouse	3
	013020	1687 E. 30TH ST.	LORAIN	Row or Townhouse	3
	013020	1689 E. 30TH ST.	LORAIN	Row or Townhouse	3

B.2b

Southside Gardens OH012-014; 28 buildings, 58 units

Construction Date: 8/31/1973

Units designated for demolition

Bldg nos.	PIC Bldg No.	Address		Building Type	No. BR
68	014001	3036 VINE AVE.	LORAIN	Non Dwelling Structure	5
69	014002	3042 VINE AVE.	LORAIN	Row or Townhouse	3
	014002	3044 VINE AVE.	LORAIN	Row or Townhouse	3
	014002	3046 VINE AVE.	LORAIN	Row or Townhouse	2
	014002	3048 VINE AVE.	LORAIN	Row or Townhouse	2
	014002	3048 VINE AVE.	LORAIN	Row or Townhouse	2
70	014003	3038 VINE AVE.	LORAIN	Semi Detached	4
	014003	3040 VINE AVE.	LORAIN	Semi Detached	4
71	014004	3052 VINE AVE.	LORAIN	Single Family/Detached	6
72	014005	1565 E. 31ST ST.	LORAIN	Single Family/Detached	5
73	014006	1547 E. 31ST ST.	LORAIN	Row or Townhouse	3
	014006	1549 E. 31ST ST.	LORAIN	Row or Townhouse	3
	014006	1551 E. 31ST ST.	LORAIN	Row or Townhouse	3
	014006	1553 E. 31ST ST.	LORAIN	Row or Townhouse	3
74	014007	1555 E. 31ST ST.	LORAIN	Semi Detached	4
	014007	1557 E. 31ST ST.	LORAIN	Semi Detached	4
75	014008	1559 E. 31ST ST.	LORAIN	Single Family/Detached	6
76	014009	1537 E. 30TH ST.	LORAIN	Semi Detached	4
	014009	1539 E. 30TH ST.	LORAIN	Semi Detached	4
77	014010	1533 E. 30TH ST.	LORAIN	Semi Detached	4
	014010	1535 E. 30TH ST.	LORAIN	Semi Detached	4
78	014011	1541 E. 30TH ST.	LORAIN	Row or Townhouse	3
	014011	1543 E. 30TH ST.	LORAIN	Row or Townhouse	3
	014011	1545 E. 30TH ST.	LORAIN	Row or Townhouse	3
	014011	1547 E. 30TH ST.	LORAIN	Row or Townhouse	3
81	014014	1519 E. 30TH ST.	LORAIN	Single Family/Detached	5
82	014015	1507 E. 30TH ST.	LORAIN	Semi Detached	4
	014015	1509 E. 30TH ST.	LORAIN	Semi Detached	4
83	014016	1511 E. 30TH ST.	LORAIN	Row or Townhouse	3
	014016	1513 E. 30TH ST.	LORAIN	Row or Townhouse	3
	014016	1515 E. 30TH ST.	LORAIN	Row or Townhouse	2
	014016	1517 E. 30TH ST.	LORAIN	Row or Townhouse	2
84	014017	1508 E. 29TH ST.	LORAIN	Row or Townhouse	2
	014017	1510 E. 29TH ST.	LORAIN	Row or Townhouse	2
	014017	1512 E. 29TH ST.	LORAIN	Row or Townhouse	3
	014017	1514 E. 29TH ST.	LORAIN	Row or Townhouse	3
85	014018	1506 E. 29TH ST.	LORAIN	Single Family/Detached	6
86	014019	1516 E. 29TH ST.	LORAIN	Semi Detached	3
	014019	1518 E. 29TH ST.	LORAIN	Semi Detached	3

B.2b	Southside Gardens OH012-14 units designated for demolition (continued)					
	Bldg nos.	PIC Bldg No.	Address		Building Type	No. BR
	87	014020	1529 E. 29TH ST.	LORAIN	Row or Townhouse	2
		014020	1531 E. 29TH ST.	LORAIN	Row or Townhouse	2
		014020	1533 E. 29TH ST.	LORAIN	Row or Townhouse	3
		014020	1535 E. 29TH ST.	LORAIN	Row or Townhouse	3
	88	014021	1537 E. 29TH ST.	LORAIN	Single Family/Detached	5
	89	014022	1541 E. 29TH ST.	LORAIN	Single Family/Detached	6
	90	014023	1543 E. 29TH ST.	LORAIN	Single Family/Detached	6
	91	014024	1545 E. 29TH ST.	LORAIN	Single Family/Detached	5
	92	014025	1547 E. 29TH ST.	LORAIN	Row or Townhouse	3
		014025	1549 E. 29TH ST.	LORAIN	Row or Townhouse	3
		014025	1551 E. 29TH ST.	LORAIN	Row or Townhouse	2
		014025	1553 E. 29TH ST.	LORAIN	Row or Townhouse	2
	94	014027	1647 E. 29TH ST.	LORAIN	Single Family/Detached	5
	95	014028	1649 E. 29TH ST.	LORAIN	Single Family/Detached	6
	96	014029	1651 E. 29TH ST.	LORAIN	Single Family/Detached	6
	97	014030	1653 E. 29TH ST.	LORAIN	Single Family/Detached	5
	98	014031	1655 E. 29TH ST.	LORAIN	Row or Townhouse	3
		014031	1657 E. 29TH ST.	LORAIN	Row or Townhouse	3
		014031	1659 E. 29TH ST.	LORAIN	Row or Townhouse	2
		014031	1661 E. 29TH ST.	LORAIN	Row or Townhouse	2
Demolition/Disposition Timetable The Demolition Applications for Wilkes Villa and Southside Gardens will be submitted to SAC in Fiscal Year 2019. The timetable for actual demolition will depend upon the approval of the demolition application; the approval of development proposals; the availability of funding; and approval of application for Mixed Finance Development, if necessary. Demolition may occur in phases based upon funding.						
B.3	Civil Rights Certification. Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.					
B.4	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input type="checkbox"/> <input checked="" type="checkbox"/> (b) If yes, please describe: N/A					

B.5	<p>Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>LMHA's 5-year Action Plan, including CFP 2018, is comprised of projects and activities from the Physical Needs Assessment (GPNA). Input has also been sought from public housing residents, the Resident Advisory Board (RAB), the public and LMHA employees. All the work listed in the 5-year Action Plan totals nearly \$80 million.</p> <p>Since LMHA's annual allotment of capital funds totals just over \$2 million, it is not fiscally possible to complete all high-priority capital improvement projects at all properties, so the priorities must be refined even further. This ensures that projects which impact health and safety issues, integrity of critical building systems, and long-term viability of structures are performed first. These decisions are based not only on the GPNA but also upon results of UPCS inspections and input from COCC administrators, site management, site staff, resident surveys and public meetings. Use of Operating Reserves in accordance with HUD regulations had been part of the capital improvement process; however, such use is not longer permitted. If HUD ends this restriction, LMHA may consider the use of operating reserves for capital improvements if necessary and available.</p> <p>LMHA is intent upon implementing its Master Plans for Redevelopment of Southside Gardens and Wilkes Villa. It is likely to take years to overcome the challenge of financing multi-million dollar projects. It is necessary to maintain the properties to ensure they remain safe, sanitary and decent. In calendar years 2015, 2016, and 2017 LMHA invested over \$1 million in interior improvements, basement repairs, water infiltration control, and roof repairs and replacement at Southside Gardens. This work will sustain the viability of the property for a number of years as financing is sought and the project is approved for construction.</p> <p>In calendar year 2017, LMHA invested \$2,647,993 in capital improvement projects agency wide (CFP2014 - \$395,280; CFP2015 - \$548,440; CFP2016 - \$1,558,909; CFP2017 - \$145,364).</p> <p>The Housing Authority has also determined to address the accessible needs of the community by implementing visitability and universal design concepts in its projects. LMHA has prudently and assertively worked towards attaining its Section 504 goals.</p> <p>LMHA will continually review its AMP structures to best serve the Housing Authority's efficiencies of operations.</p> <p>The Authority shall continue its implementation and utilization of technologies to improve the productivity of staff, such as new software to gain insights from housing data, conference calling to reduce employee travel to meetings, and online Paychex login for employees to gain access to their human resource data.</p> <p>Many of LMHA's goals are not just capital improvements listed in the PHA 5-Year Action Plan. LMHA established many goals and programs, often in collaboration with other social service agencies, governmental authorities, non-profit groups, and private entities, to enhance and improve the living environment and self sufficiency of residents. An impressive collection of goals and success stories is posted online at http://www.lmha.org/about-lmha/annual-reports/. The reader is encouraged to review the successes of the Lorain Metropolitan Housing Authority that extend beyond the provision of quality affordable housing.</p> <p>For a listing of completed capital fund projects and costs, go to http://www.lmha.org/about-lmha/annual-reports/. Click on documents labeled "50075.1" for a particular year of interest.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
B.7	<p>Certification by State or Local Officials. Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD on September 15, 2017.</p>

Instructions for Preparation of Form HUD-50075-ST

Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section.

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Annual Plan. All PHAs must complete this section.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” ([24 CFR §903.7](#))

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(1\)](#)) Provide a 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. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. ([24 CFR §903.7\(b\)](#)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. ([24 CFR §903.7\(b\)](#)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. ([24 CFR §903.7\(b\)](#))

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#))

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. ([24 CFR §903.7\(e\)](#))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. ([24 CFR §903.7\(f\)](#))

☐ **Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

☐ **Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)](#)) A description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. ([24 CFR §903.7\(l\)](#))

☐ **Safety and Crime Prevention.** Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. ([24 CFR §903.7\(m\)](#)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs

provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define "significant amendment/modification", HUD will consider the following to be "significant amendments or modifications": a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(ii))

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **Hope VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

☐ **Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

☐ **Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32](#)

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21](#). (24 CFR §903.7(e))

☐ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b))

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Civil Rights Certification. Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

B.5 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.6 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

B.7 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

B.8 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

C. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

C.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form- 50075.2 approved by HUD on XX/XX/XXXX."

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 9.2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

**RESIDENT ADVISORY BOARD (RAB)
COMMENTS ON THE
SIGNIFICANT AMENDMENT TO THE
2018 LORAIN METROPOLITAN HOUSING AUTHORITY
ANNUAL PLAN
October 10, 2018**

The Lorain Metropolitan Housing Authority (LMHA) met with the Resident Advisory Board (RAB) on **October 10, 2018** to discuss the proposed Significant Amendment to the 2018 Annual Plan. **Twenty-one** RAB members representing Public Housing, Housing Choice Voucher Program, and Section 8 New Construction participated in the meeting. LMHA was represented by 4 employees.

LMHA sent a brief explanation of the proposed change to the RAB members on October 1, 2018. At the meeting, the full text of the change was presented and discussed with the RAB. The summary of questions and comments and LMHA's response and actions follow.

Comments on Significant Amendment

An HCVP participant asked if we had a graph of the income limits and fair market rents. A chart showing this information was provided.

Residents expressed agreement with the decision not to terminate leases after 2 years at 120% area median income.

Treasurer asked if there was a motion to vote on changes; Motion to vote; Motion seconded; All voted in favor of accepting the change.