

<b>Streamlined Annual PHA Plan</b> <i>(High Performer 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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**LORAIN MHA 2020 ANNUAL PLAN DRAFT for PUBLIC REVIEW 1/31/2020**

**ADDITIONS/CHANGES TO THE PLAN ARE HIGHLIGHTED IN GRAY**

**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-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small 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.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and 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.

<b>A.</b>	<b>PHA Information.</b>
	<p> <b>PHA Name:</b> <u>LORAIN METROPOLITAN HOUSING AUTHORITY</u>      <b>PHA Code:</b> <u>OH012</u>  <b>PHA Type:</b> <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2020</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>1438</u>    <b>Number of Housing Choice Vouchers (HCVs)</b> <u>3129</u>  <b>Total Combined</b> <u>4567</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission      <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. 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 <a href="http://www.lmha.org">www.lmha.org</a>. 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"> <li>o LMHA Procurement Office 1604 Kansas Avenue, Lorain, OH 44052</li> <li>o Leavitt Homes 2153 Lorain Drive, Lorain, OH 44052</li> <li>o Kennedy Plaza 1730 Broadway, Lorain, OH 44052</li> <li>o Lakeview Plaza 310 W. 7<sup>th</sup> Street, Lorain, OH 44052</li> <li>o Southside Gardens 3010 Vine Ave., Lorain, OH 44055</li> <li>o Albright Terrace 129 Milan Ave., Amherst, OH 44001</li> <li>o John Frederick Oberlin Homes 138 South Main St., Oberlin, OH 44074</li> <li>o Wilkes Villa 104 Loudon Court, Elyria, OH 44035</li> <li>o Riverview Plaza 310 East Ave., Elyria, OH 44035</li> <li>o Harr Plaza 15 Chestnut Street, Elyria, OH 44035</li> <li>o International Plaza 1825 Homewood Drive, Lorain, OH 44055</li> </ul> </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 <a href="http://www.lmha.org/about-lmha/">http://www.lmha.org/about-lmha/</a> and select either "Annual Reports and Audits" or "LMHA Policies". For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750.         </p>

**PHA Consortia:** (Check box if submitting a Joint PHA Plan and complete table below)

	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 Revision of PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Homeownership Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification

**B.1b** (b) The PHA must submit its Deconcentration Policy for Field Office Review.

*Even if no revisions have been made to an Element, each of the PHA Plan Elements listed in section B.1a above is discussed, described, stated, or addressed in section B.1b in the following pages as required by Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs.*

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 2019, more than 90% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 87% of public housing residents, 92% of multifamily residents, and 80% of participants in HCVP are ELI. For comparison, approximately 15% of families in Lorain County are ELI<sup>1</sup>. Nearly 20% of the public housing households (278) have zero annual income. Nearly 400 (more than 20%) public housing adults must perform Community Service. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County.

Approximately 38% 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 (41% are elderly, 90% are persons with a disability). In LMHA's public housing, 35% of the heads of households are persons with a disability, and 14% of the heads of household are elderly.

LMHA processed more than 650 requests for Reasonable Accommodations annually for all housing programs in calendar year 2019.

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.

Despite the high demand for subsidized housing in Lorain County, applicant families consisting of only 1 person are becoming more selective and will turn down an offer for housing in a zero-bedroom (i.e., efficiency) apartment. It is not uncommon for an efficiency unit to be rejected by 10 or more applicants. To address this issue, LMHA is considering a modernization project to convert efficiencies to 1-bedroom units by combining 3 adjacent efficiencies into 2 1-bedroom units. One building lends itself to such a project, namely Lakeview Plaza, 310 W 7<sup>th</sup> Street, Lorain, OH 44052, in which 150 of the 209 units are efficiencies. The project has been added to the 2019 5-Year Action Plan, though no definite plans have been made to proceed with the project.

<sup>1</sup>Source for Lorain County statistics: [http://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml)

**B.1b** **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.)

The Plan 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:

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.

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.

Another housing problem is the lack of permanent housing for the homeless. Once again this is an affordability issue.

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.

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. See tables in subsequent pages listing the percentages of applicants and families housed in Public Housing, HCVP, or Multifamily that are considered elderly or are families with disabilities. In Lorain County, 14% of PH families and 17% of HCVP families housed in Lorain county are elderly; 36% of PH and 41% 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.

On page 42, Elyria's Plan discusses disproportionate needs by race and ethnicity:

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%.

There are three (3) disproportionately impacted groups in terms of having a housing problem, a severe housing problem, or a housing cost burden.

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

In Lorain County, 43% of PH and 54% 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 42% of HCVP families and 36% 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.

**The City of Lorain's Consolidated Plan 2015-2019 includes housing needs analyses on pages 24-58.**

On page 38, Lorain's Plan discusses the most common housing problems:

[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.

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.

On pages 55-57, the Plan lists housing needs not previously identified:

Based on input and data received through an extensive citizen participation process, the greatest housing needs are:

- 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.)

On page 57, Lorain's Plan summarizes:

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.

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.

**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.

The tables that follow provide a snapshot in time of the demographics of applicants on the waiting lists and families housed in LMHA's public housing, Housing Choice Voucher Program, and Multifamily housing programs.

<b>Housing Needs of Housing Choice Voucher Program (HCVP) APPLICANTS ACTIVE on Waiting List<sup>3</sup></b>			Statistics for Lorain County Households <sup>1,2</sup>
<b>NOTE: LMHA is currently accepting HCVP applications the first and third Friday of every month.</b>	# of Families	% of Total Families	
<b>Totals as of December 31, 2019</b>	45	100%	118,594
Extremely low income (<=30% AMI)	38	84.4%	10.2%
Very low income (>30% but <=50%AMI)	7	15.6%	9.7%
Low Income (>50% but <80% AMI)	0	0%	14.0%
Families with children <sup>4</sup>	35	77.8%	32.77%
Elderly families	1	2.2%	27.42%
Families with Disabilities	5	11.1%	15.3
Female HOH	38	84.4%	
Hispanic	22	48.9%	9.52%
White	23	51.1%	85.24%
Black/African American	19	42.2%	8.42%
American Indian/Alaska Native	0	0%	0.31%
Asian	0	0%	1.01%
Native Hawaiian/other Pacific Islander	0	0%	0.04%
Multi-racial	2	4.4%	3.77%
Not reported	0	0%	-

**Housing Needs of HOUSING CHOICE VOUCHER PROGRAM APPLICANTS not yet processed for eligibility<sup>5</sup>**

<b>Totals as of December 31, 2019</b>	179	100%
Female HOH	151	84.4
Hispanic	43	24.0%
White	61	34.1%
Black/African American	96	53.6%
American Indian/Alaska Native	2	1.1%
Asian	0	0%
Native Hawaiian/other Pacific Islander	0	0%
Multi-racial	10	5.6%
Not reported	0	0%

<sup>1</sup>Source for Lorain County statistics: 2013-2017 American Community Survey 5-Year Estimates [http://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml)

<sup>2</sup>Race and ethnicity percentages are based upon Lorain County population, not households

<sup>3</sup>Statistics reflect characteristics of persons who have applied for housing, have been interviewed, and are in process for the waiting list.

<sup>4</sup>The number of LMHA families with children is actually households with 2 or more family members.

<sup>5</sup>These persons have submitted an application only and have not been interviewed to determine eligibility.

B.1b

Housing Needs of PUBLIC HOUSING (PH) APPLICANTS ACTIVE on Waiting List <sup>3</sup>			Statistics for Lorain County Households <sup>1,2</sup>
NOTE: LMHA is currently NOT accepting PH applications.	# of Families	% of Total Families	
<b>Totals as of December 31, 2019</b>	246	100%	118,594
Extremely low income (<=30% AMI)	218	88.6%	10.2%
Very low income (>30% but <=50%AMI)	25	10.2%	9.7%
Low Income (>50% but <80% AMI)	3	1.2%	14.0%
Families with children <sup>4</sup>	99	40.2%	32.77%
Elderly families	15	6.2	27.42%
Families with Disabilities	60	24.4%	15.3
Female HOH	169	68.7%	
Hispanic	54	22.0%	9.52%
White	110	44.7%	85.24%
Black/African American	106	43.1%	8.42%
American Indian/Alaska Native	2	0.8%	0.31%
Asian	0	0.0%	1.01%
Native Hawaiian/other Pacific Islander	2	0.8%	0.04%
Multi-racial	13	5.3%	3.77%

**Housing Needs of PUBLIC HOUSING (PH) APPLICANTS not yet processed for eligibility<sup>5</sup>**

<b>Totals as of December 31, 2019</b>	3711	100%
Female HOH	2896	78.1%
Hispanic	710	19.1%
White	1125	30.3%
Black/African American	2064	55.6%
American Indian/Alaska Native	27	0.7%
Asian	7	0.2%
Native Hawaiian/other Pacific Islander	25	0.7%
Multi-racial	118	3.2%
Not reported	4	0.1%

<sup>1</sup>Source for Lorain County statistics: 2013-2017 American Community Survey 5-Year Estimates [http://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml)

<sup>2</sup>Race and ethnicity percentages are based upon Lorain County population, not households

<sup>3</sup>Statistics reflect characteristics of persons who have applied for housing, have been interviewed, and are in process for the waiting list.

<sup>4</sup>The number of LMHA families with children is actually households with 2 or more family members.

<sup>5</sup>These persons have submitted an application only and have not been interviewed to determine eligibility.

B.1b

<b>Housing Needs of MULTIFAMILY HOUSING (Harr/International Plazas) APPLICANTS ACTIVE on Waiting List<sup>3</sup></b>			Statistics for Lorain County Households <sup>1,2</sup>
<b>NOTE: LMHA is currently NOT accepting MF applications.</b>	# of Families	% of Total Families	
<b>Totals as of December 31, 2019</b>	101	100%	118,594
Extremely low income (<=30% AMI)	98	97.0%	10.2%
Very low income (>30% but <=50%AMI)	3	3.0%	9.7%
Low Income (>50% but <80% AMI)	0	0%	14.0%
Elderly/Near Elderly families	15	14.9%	27.42%
Families with Disabilities	51	50.5%	15.3
Female HOH	56	55.45%	
Hispanic	22	21.8%	9.52%
White	60	59.4%	85.24%
Black/African American	24	23.8%	8.42%
American Indian/Alaska Native	2	2.0%	0.31%
Asian	0	0%	1.01%
Native Hawaiian/other Pacific Islander	4	4.0%	0.04%
Multi-racial	2	2.0%	3.77%
Not reported	0	0%	-

**Housing Needs of MULTIFAMILY HOUSING APPLICANTS not yet processed for eligibility<sup>4</sup>**

<b>Totals as of December 31, 2019</b>	744	100%
Female HOH	478	64.3%
Hispanic	134	18.0%
White	278	37.4%
Black/African American	351	47.2%
American Indian/Alaska Native	7	0.9%
Asian	6	0.8%
Native Hawaiian/other Pacific Islander	5	0.7%
Multi-racial	22	3.0%
Not reported	3	0.4%

<sup>1</sup>Source for Lorain County statistics: 2013-2017 American Community Survey 5-Year Estimates [http://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml)

<sup>2</sup>Race and ethnicity percentages are based upon Lorain County population, not households

<sup>3</sup>Statistics reflect characteristics of persons who have applied for housing, have been interviewed, and are in process for the waiting list.

<sup>4</sup>These persons have submitted an application only and have not been interviewed to determine eligibility.

### Housing statistics of current LMHA families

<b>Total HCVP Families (12/31/2019)</b>	2968	100.0%
Disabled HOH	1218	41.0%
Elderly HOH	504	17.0%
Hispanic	783	26.4%
Non-Hispanic	2185	73.6%
Female HOH	2496	84.1%
Male HOH	472	15.9%
White	1623	54.7%
Black/African American	1247	42.0%
American Indian/Alaska Native	23	1.0%
Native Hawaiian/Other Pacific Islander	27	1.0%
Asian	1	0%
Multi-Racial	48	1.6%
Extremely low income (ELI)	2365	79.7%
Very low income (VLI)	493	16.6%
Low Income (LI)	103	3.5%
High Income	7	0.2%
Average Household Income	\$13,201	

<b>Total Public Housing Families (12/31/2019)</b>	1411	100.0%
Disabled HOH	505	35.8%
Elderly HOH	194	13.8%
Hispanic	413	29.3%
Non-Hispanic	998	70.7%
Female HOH	1026	72.7%
Male HOH	385	27.3%
White	850	60.2%
Black/African American	504	35.7%
American Indian/Alaska Native	10	0.7%
Native Hawaiian/Other Pacific Islander	14	1.0%
Asian	1	0.1%
Multi-Racial	32	2.3%
Extremely low income (ELI)	1226	86.9%
Very low income (VLI)	136	9.6%
Low Income (LI)	41	2.9%
High Income	8	0.6%
Average Household Income	\$9894.71	

B.1b

<b>Total Multifamily Housing Families (Harr and International Plazas) (12/31/19)</b>	<b>199</b>	<b>100.0%</b>
Disabled HOH	179	90.0%
Elderly HOH	81	40.7%
Hispanic	45	22.6%
Non-Hispanic	154	77.4%
Female HOH	91	45.7%
Male HOH	108	54.3%
White	140	70.4%
Black/African American	53	26.6%
American Indian/Alaska Native	1	0.5%
Native Hawaiian/Other Pacific Islander	2	1.0%
Asian	0	0%
Multi-Racial	3	1.5%
Extremely low income (ELI)	183	92.0%
Very low income (VLI)	16	8.0%
Low Income (LI)	0	0%
High Income	0	0%
Average Household Income	\$10,672	

**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 87% of the public housing households being Extremely Low Income (ELI), 19.7% having zero annual income, and none of the public housing properties being above the high end of the Established Income Range (EIR), there are no opportunities to transfer higher income residents to lower income properties. Note that 93% (1139) of the 1225 public housing families that are ELI have annual household incomes below ELI for a single person (i.e., family of one).

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).

B.1b

**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 accepted at the LMHA Main Office 1600 Kansas Avenue in Lorain when the waiting lists are open. 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.

For all housing programs, a two-step process is used for all applications. LMHA will first require families to provide the information needed to make an initial assessment of the family's eligibility. If the family meets the initial eligibility requirements, the family will be invited to attend the full application interview. Bedroom size will be determined by the family composition and other information provided by the applicant during a pre-screening meeting on the days and times applications are accepted. If applying for a waiting list that is open, the family will be invited to attend the full application interview. LMHA will advertise the date and time applications are accepted, as well as all documentation the family must provide to apply.

Bedroom size may also be based upon 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.

Families are required to participate in a private eligibility interview to be placed on the waiting list. All adult members of the household must attend the interview together. The interview will be conducted only if all adult members provide appropriate documentation of legal identity and current, government issued photo id. If the family does not provide the required documentation, the applicant family may return on the next day applications are accepted.

The family must also complete required forms, provide required signatures, and submit required documentation. Applications cannot be submitted without the minimum required documents listed in the waiting list opening advertisement. Any additional documents or information requested by the PHA at the interview must be provided within 10 business days of the interview. If the required documents and information are not provided within the required timeframe (plus any extensions), the family will be sent a notice of denial.

An advocate, interpreter, or other assistant may assist the family with the application and the interview process. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

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.

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 application 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 PHA'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 or due to circumstances beyond the family's control.

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

Families will be selected from the waiting list on a first-come, first-served basis according to the date, time, and bedroom size their application is received by the PHA. 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 24 hours, 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.

Applicants may refuse to accept a unit offer for "good cause," for situations in which an applicant is willing to move but is unable to do so at the time of the unit offer, or the applicant demonstrates that acceptance of the offer would cause undue hardship. Examples of good cause for refusal of a unit offer include, but are not limited to, the following: accepting the unit offer will require an adult household member to quit a job, drop out of an educational institution or job training program, or take a child with a disability out of day care or an educational program for children with disabilities. If an applicant refuses a first unit offer and does not have an approved good cause, they are placed at the bottom of the waiting list. If an applicant refuses a second unit offer and does not have an approved good cause, they are removed from the waiting list. Applicants may reapply anytime the waiting list is open.

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, it is considered unit refusal.

**B.1b**

The waiting list will be updated by bedroom size or program type as needed to ensure that all applicant information is current and timely. The PHA may elect to purge the entire waiting list or applicants that have been on the waiting list for a set time, for example any applications on the waiting list for six months or longer.

PHAs are authorized to obtain criminal conviction records to screen applicants for admission to the public housing program. This authority assists the PHA in complying with HUD requirements and PHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. PHAs are required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided.

If the PHA proposes to deny admission based on a criminal record or on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission.

Criminal activity includes, but is not limited to any record of convictions, arrests, evictions, or release from detention/incarceration or probation/parole for suspected drug-related or violent criminal activity of household members within the past 3 years. The look-back period for felonies and misdemeanors which may reasonably impact community safety, such as domestic violence or concealed weapons offenses, is THREE (3) years. The look-back period for misdemeanors which may not reasonably impact community safety is ONE (1) year. The look-back periods apply from the date of conviction, release from detention/ incarceration, or completion of probation/parole, whichever is more recent, to the date of screening. Applicants with pending cases or outstanding arrest warrants may be denied housing depending upon the nature or seriousness of the case. LMHA will afford the applicant the opportunity to participate in a hearing to discuss the case. LMHA may determine to defer a decision pending adjudication of the case.

A conviction for such activity will be given more weight than an arrest or an eviction. An arrest of an applicant for a disqualifying offense shall not, in and of itself, be a conclusive determination that the applicant engaged in disqualifying criminal activity but may be considered as a factor in the consideration of the totality of the facts and circumstances of any given incident.

When the PHA denies admission, the letter will advise applicants of their right to request a hearing in writing within 14 business days. Should an applicant fail to request a hearing within 14 business days, fail to attend a scheduled hearing, or fail to call to reschedule prior to the hearing, the decision to deny will be upheld.

Refer to the Public Housing ACOP Chapter 3 Eligibility and the HCVP Administrative Policy Chapter 3, Part III, Denial of Assistance for the complete screening process and eligibility determination.

**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 FYE 6/30/2019	
1	<b>Federal Grants - Current</b>
	Public Housing Operating Fund \$7,116,186.00
	Public Housing Capital Fund \$3,149,706.00
	HOPE VI Revitalization \$0.00
	HOPE VI Demolition \$0.00
	Annual Contributions for Section 8 Tenant Based Assistance \$23,162,206.00
	Resident Opportunity and Self-Sufficiency Grants \$218,175.00
	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) \$715,489.00
3	Public Housing Dwelling Rental Income \$2,070,562.00
	<b>\$37,423,029.00</b>

**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 Multifamily Housing 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, and families who are currently on a minimum rent hardship. 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 for bedrooms 0 through 3 are set at 94% of the FMR. Payment standards for bedrooms 4 through 8 are set at 95% of the FMR.

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.

LMHA's flat rent policies comply with Notice PIH 2017-23.

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 2017-23 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 the effective date of new FMRs or SAFMRs published by HUD, the PHA must:

1. Compare the current flat rent amount to the applicable FMR and SAFMR/unadjusted rent. If the PHA is in compliance with this the law, no further steps are necessary:
  - a) If the flat rent is at least equal to the lower of:
    - a. 80 percent of the FMR, or
    - b. 80 percent of the SAFMR (or if no SAFMR is available, 80 percent of unadjusted rent).
  - b) If the current flat rent is less than the lower of option a. or option b. above, the PHA must set flat rents at no less than 80 percent of the lower of the 80 percent FMR or 80 percent SAFMR/80 percent unadjusted rent, subject to the utilities adjustment in Section 6 of Notice PIH 2017-23, or the PHA may request an exception flat rent pursuant to the requirements of Section 5 of Notice PIH 2017-23;
2. Update the flat rent policies in the Admissions and Continued Occupancy Policies (ACOP) as necessary;
3. Permit the family to choose between the flat rent amount and the income-based rent for all new admissions; and
4. Offer the updated flat rent amount at the next annual rent option for families that are current Public Housing residents, and permit the family to choose between the flat rent amount and the income-based rent, subject to the phase-in requirements in Section 8 of this Notice PIH 2017-23.

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](http://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 QHWRRA 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**

**Operations 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\(c\)](#))

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.

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, Human Resources, 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.

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).

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.

LMHA's rules, standards, and policies for governing the management of the Housing Choice Voucher Program are contained in LMHA's HCVP Administrative Plan.

These documents are posted at [www.lmha.org/about-lmha/lmha-policies/](http://www.lmha.org/about-lmha/lmha-policies/)

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.

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:

- 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

ID Policy for entrance into High Rises  
 Integrated Pest Management Extermination & Bed Bug 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

**Extermination Policies**

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.

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.

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.

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.

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.

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.

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

Following are the proposed changes to the LMHA Admissions and Continued Occupancy Policy to go into effect July 1, 2020.

**Page 3-17 3-II.C. SOCIAL SECURITY NUMBERS****PHA Policy**

PIH Notice number updated from 2012-10 to 2018-24 in heading

**Page 4-3 4-I.B. APPLYING FOR ASSISTANCE****CURRENT:**

A two-step process will be used for all applications. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's bedroom size. Bedroom size will be determined by the family composition and other information provided by the applicant when the online pre-application is submitted. The family will be invited to attend the full application interview according to pre-application date, time, and bedroom size at which time they will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list. Families may complete an online pre-application at www.lmha.org. Applicants needing assistance may visit our office at 1600 Kansas Ave, Lorain during business hours and use a kiosk to complete the pre-application.

**PROPOSED:**

A two-step process will be used for all applications. Under the two-step application process, the PHA initially will require families to provide the information needed to make an initial assessment of the family's bedroom size all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list. Bedroom size will be determined by the family composition and other information provided by the applicant during a pre-screening meeting on the days and times applications are accepted. If applying for a waiting list that is open, the family will be invited to attend the full application interview. The PHA will advertise the date and time applications are accepted, as well as all documentation the family must provide to apply.

**Page 4-5 4-I.D. PLACEMENT ON THE WAITING LIST, Eligible for Placement on the Waiting List****CURRENT:**

Applicants will be placed on the waiting list according to PHA preference(s) if they are in effect and the date and time their pre-application is received by the PHA. Currently, LMHA does not have any active preferences.

**PROPOSED:**

Applicants will be placed on the waiting list according to PHA preference(s) if they are in effect and the date and time their application is received by the PHA. Currently, LMHA does not have any active preferences.

**Page 4-9 4-II.C. Reopening the Waiting List****CURRENT:**

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to

**PROPOSED:**

The PHA will give public notice by publishing the relevant information in suitable media outlets *such as*, but not limited to

**Page 4-20 4-III.B. SELECTION METHOD, Order of Selection****CURRENT:**

Families will be selected from the waiting list on a first-come, first-served basis according to the date, time, and bedroom size their pre-application is received by the PHA.

**PROPOSED:**

Families will be selected from the waiting list on a first-come, first-served basis according to the date, time, and bedroom size their application is received by the PHA.

**Page 4-23 4-III.D. THE APPLICATION INTERVIEW**

PIH Notice number updated from 2012-10 to 2018-24 in heading

**CURRENT:**

Families who complete a pre-application are required to participate in a private eligibility interview to be placed on the waiting list. All adult members of the household must attend the interview together.

The interview will be conducted only if all adult members provide appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity) and current, government issued photo id. If the family does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.

The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process. Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will have their applications made inactive based on the family's failure to supply information needed to determine eligibility. The second appointment letter will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested and their application will be made inactive. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination, therefore the PHA will not offer an informal hearing.

**ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes Continued****PROPOSED:**

Families are required to participate in a private eligibility interview to be placed on the waiting list.

All adult members of the household must attend the interview together.

The interview will be conducted only if all adult members provide appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity) and current, government issued photo id. If the family does not provide the required documentation, the applicant family may return on the next day applications are accepted.

The family must provide all the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. Applications cannot be submitted without the minimum required documents listed in the waiting list opening advertisement.

Any additional documents or information requested by the PHA at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required timeframe, the family may request an extension. If the required documents and information are not provided within the required timeframe (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

**Page 4-23 4-III.D. THE APPLICATION INTERVIEW**

PIH Notice number updated from 2012-10 to 2018-24 in heading

**Page 6-23 6-I.G. ASSETS, Types of Assets, Checking and Savings Accounts****CURRENT:**

In determining the value of a checking account, the PHA will use the average monthly balance for the last six months.

**PROPOSED:**

In determining the value of a checking account, the PHA will use the current balance. For the LIHTC waiting list, the PHA will use the average balance for the last six months.

**Page 6-27 6-I.H. PERIODIC PAYMENTS**

PIH Notice number updated from 2012-10 to 2018-24 in heading

**Page 6-34 6-I.I. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME**

Final paragraph added: (aa) Distributions from an ABLE account, and actual or imputed interest on the ABLE account balance

**Page 7-1 VERIFICATION**

PIH Notice number updated from 2017-12 to 2018-18 in in chapter title, 2nd paragraph on p. 7-1, 1st subheading on p. 7-2, and in last paragraph on p. 7-3, 2<sup>nd</sup> paragraph on p. 7-5, subheading on p. 7-6, 2<sup>nd</sup> subheading on p 7-7, and 1<sup>st</sup> subheading on p. 7-8

**Page 7-4 7-I.C. EIV Income (and IVT) Reports**

Reference to Income Validation Tool (IVT) reports added throughout

**Page 7-12 SOCIAL SECURITY NUMBERS**

PIH Notice number updated from 2012-10 to 2018-24

**Page 8-2 8-I.A. OVERVIEW**

Fourth paragraph added: PHAs must include in the ACOP residential minimum heating standards policies [Notice PIH 2018-19].

**Page 9-16 Required Reporting****CURRENT:**

4<sup>th</sup> Paragraph: The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID) and families who are currently on a minimum rent hardship. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

**PROPOSED:**

The PHA will only conduct interim reexaminations for families:

- that qualify for the earned income disallowance (EID)
- who are currently on a minimum rent hardship.
- Who are participating in quarterly reporting
- Whose unemployment benefits end and the member has started a job
- Who are on layoff, temporary disability, summer vacation (ie school employee where income is not annualized) or medical leave return to the same employer
- With an FSS participant requesting in writing that an interim certification be completed

**Page 9-17 Method of Reporting****CURRENT:**

The PHA will accept required documentation by mail, by fax, or in person.

**PROPOSED:**

The PHA will accept required documentation by mail, by email, by fax, or in person.

**Page 13-6 FAILURE TO DISCLOSE AND DOCUMENT SOCIAL SECURITY NUMBERS**

PIH Notice number updated from 2012-10 to 2018-24

B.1b

**ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes Continued**

**Page 13-9 13-III.A. Terminations - Overview**

**CURRENT:**

The PHA, with some restrictions, also has the option to terminate the tenancies of families who are over income.

**PROPOSED:**

The PHA also has the option to terminate the tenancies of certain over-income families.

**Page 13-18 Over Income Families**

**CURRENT: 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:**

**Over-Income Families [24 CFR 960.261; FR Notice 7/26/18; Notice PIH 2019-11]**

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 adjusted 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.

Notice PIH 2019-11 also requires that PHAs publish over-income limits in their ACOP and update them no later than 60 days after HUD publishes new income limits each year. The over-income limit is calculated by multiplying the very low-income limit (VLI) by 2.4, as adjusted for family size.

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

The PHA will rely on the HUD-published over-income limits. These numbers will be effective within 60 days of HUD publishing new income limits each year and will be effective for all annual and interim reexaminations.

**Page 13-26 Terminating or Evicting a Perpetrator of Domestic Violence**

**CURRENT:**

Last sentence, Second paragraph: The PHA must not initiate eviction procedures until 30 days after the lease bifurcation

**PROPOSED:**

Last sentence, Second paragraph: However, perpetrators should be given no more than 30 days' notice of termination in most cases

**Page 14-4. 14. I.B. INFORMAL HEARING DECISION**

**CURRENT:**

**PHA Policy**

The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 10 business days of the informal hearing, to the applicant and his or her representative, if any.

**PROPOSED:**

**PHA Policy**

The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 14 business days of the informal hearing, to the applicant and his or her representative, if any.

B.1b

**ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes Continued**

**Page 14-12. 14-III.D. INFORMAL SETTLEMENT OF GRIEVANCE**

**CURRENT:**

**PHA Policy**

The PHA will prepare a summary of the informal settlement within 10 business days; one copy to be given to the tenant and one copy to be retained in the PHA's tenant file.

**PROPOSED:**

**PHA Policy**

The PHA will prepare a summary of the informal settlement within 14 business days; one copy to be given to the tenant and one copy to be retained in the PHA's tenant file.

**Page 14-14. 14-III.E. SCHEDULING OF HEARINGS**

**CURRENT:**

**PHA Policy**

Within 10 business days of receiving a written request for a hearing, the hearing officer will schedule and send written notice of the hearing to both the complainant and the PHA.

**PROPOSED:**

**PHA Policy**

Within 14 business days of receiving a written request for a hearing, the hearing officer will schedule and send written notice of the hearing to both the complainant and the PHA.

**Page 14-15 14-III.F. SELECTION OF HEARING OFFICER**

**PROPOSED:**

**PHA Policy**

Second and third paragraph added: The PHA will appoint a staff member who was not involved in the decision under appeal. If a designated staff member (such as the program manager) was involved in the decision, or is a subordinate of such person, an alternate hearing officer will be selected.

The PHA may select designated staff members who were not involved in the decision under appeal in certain circumstances, such as appeals involving discrimination claims or denials of requests for reasonable accommodations.

**Page 14-16. 14-III.G. PROCEDURES GOVERNING THE HEARING**

**CURRENT:**

•The right to be represented by counsel or other person chosen to represent the tenant, and to have such person make statements on the tenant's behalf.

**PHA Policy**

Hearings may be attended by the following applicable persons:

A PHA representative(s) and any witnesses for the PHA

The tenant and any witnesses for the tenant

The tenant's counsel or other representative

Any other person approved by the PHA as a reasonable accommodation for a person with a disability

**PROPOSED:**

•The right to be represented by counsel or other person chosen to represent the tenant, and to have such person make statements on the tenant's behalf.

**PHA Policy**

Hearings may be attended by the following applicable persons:

A PHA representative(s) and any witnesses for the PHA

The tenant and any witnesses for the tenant

The tenant's counsel or other legal representative

Any other person approved by the PHA as a reasonable accommodation for a person with a disability

**Page 14-20. 14-III.H. DECISION OF THE HEARING OFFICER**

**CURRENT:**

**PHA Policy**

The hearing officer will issue a written decision to the family and the PHA no later than 10 business days after the hearing. The report will contain the following information:

**PROPOSED:**

**PHA Policy**

The hearing officer will issue a written decision to the family and the PHA no later than 14 business days after the hearing. The report will contain the following information:

**Page 15-10 Prohibited Activities**

**PROPOSED:**

Final three paragraphs added:

Committing sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (supervisory harassment) or hostile environment

Allowing sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (supervisory harassment) or hostile environment, where the PHA knew or should have known such harassment was occurring

Retaliating against any applicant, resident, or staff reporting sexual harassment or other harassment based on race, color, religion, national origin, familial status, disability, sexual orientation, or gender identity, either quid pro quo (supervisory harassment) or hostile environment

B.1b

**ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) Changes Continued**

**Page 16-3 16-I.B UTILITY ALLOWANCES**

**Air conditioning Surcharges [24 CFR 965.505(e)]**

**CURRENT:**

Residents will be surcharged for the cost of electricity for each air conditioner installed in their unit. This annual surcharge will be on the July rent statement in addition to rent, maintenance charges, etc. Failure to pay the surcharge is grounds for termination of lease.

This fee will be prorated for persons moving in after June 1 but before September 15, and for residents who have paid the surcharge but move out before September 15.

Fees will be reviewed annually and may be modified based upon utility rates. Every three (3) years, the degree-day portion of the surcharge calculation will be reviewed and adjusted, if necessary, based upon historical temperatures.

**PROPOSED:**

Residents will be surcharged for the cost of electricity for each air conditioner installed in their unit. This annual surcharge will be on the July rent statement in addition to rent, maintenance charges, etc. Failure to pay the surcharge is grounds for termination of lease.

This fee will be prorated for persons moving in after May 15 but before October 15, and for residents who have paid the surcharge but move out before October 15.

Fees will be reviewed annually and may be modified based upon utility rates. Every three (3) years, the high-temperature portion of the surcharge calculation will be reviewed and adjusted, if necessary, based upon historical temperatures.

**Page 16-9 16-II.B. FLAT RENTS [24 CFR 960.253(b) and Notice PIH 2017-23]**

**CURRENT:**

PHAs must receive written HUD approval before implementing exception flat rents. PHAs with a previously approved flat rent exception request may submit a written request to extend the approved flat rents for up to two additional years, provided local market conditions remain unchanged. Detailed information on how to request exception flat rents can be found in Notice PIH 2017-23.

PHAs are now required to apply a utility allowance to flat rents. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.

**Review of Flat Rents**

No later than 90 days after HUD publishes new annual FMRs/SAFMRs/unadjusted rent, PHAs must revise flat rents as necessary based changes to the FMR/SAFMR/unadjusted rent. The PHA must offer changes to the flat rent to all new admissions and to existing families at the next annual rent option.

**PROPOSED:**

PHAs must receive written HUD approval before implementing exception flat rents. PHAs with a previously approved flat rent exception request may submit a written request to extend the approved flat rents for up to two additional years, provided local market conditions remain unchanged. Detailed information on how to request exception flat rents can be found in Notice PIH 2017-23.

PHAs are now required to apply a utility allowance to flat rents as necessary. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.

**Review of Flat Rents**

No later than 90 days after the effective date of the new annual FMRs/SAFMRs/unadjusted rent, PHAs must implement new flat rents as necessary based changes to the FMR/SAFMR/unadjusted rent or request an exception

**Page 16-21 16-VI.A. REPORTING REQUIREMENTS [24 CFR 35.1130(e); Notice PIH 2017-13]**

**CURRENT:**

The PHA will provide written notice of each known case of a child with an elevated blood level to the HUD field office within 5 business days of receiving the information.

**PROPOSED:**

The PHA will provide written notice of each known case of a child with an elevated blood level to the HUD field office, and to HUD's Office of Lead Hazard Control (OLHCHH), within 5 business days of receiving the information.

**Page GL-7 B. Glossary of Public Housing Terms**

**Family.**

**Proposed:**

Sixth bullet point added:

- One or more individuals (who have not attained the age of 18 years) being domiciled with:
  - A parent or other person having or seeking such custody, with the written permission of such parent or other person
  - The designee of such parent or other person having or seeking such custody, with the written permission of such parent or other person

B.1b

## **Housing Choice Voucher Program Administrative Policy Changes**

Updated the Table of Contents

### **Page Intro-iii**

Updated info on HUD-50058 Instruction Booklet and replaced PIH 2012-10 with **PIH 21018-24** info.

### **Page Intro-iv**

Updated links in the last two paragraphs.

### **Page 2-4**

Under 2-I.B Nondiscrimination: Added a new bullet to include "Subject anyone to sexual harassment".

### **PROPOSED:**

#### **Page 2-5 Discrimination Complaints**

If an applicant or participant believes that any family member has been discriminated against by the PHA or an owner, the family should advise the PHA. The PHA should make every reasonable attempt to determine whether the applicant's or participant's assertions have merit and take any warranted corrective action.

### **CURRENT:**

#### **Page 2-5 Discrimination Complaints**

If an applicant or participant believes that any family member has been discriminated against by the PHA or an owner, the family should advise the PHA. HUD requires the PHA to make every reasonable attempt to determine whether that applicant's or participant's assertions have merit and take any warranted corrective action.

### **Page 3-17**

Updated PIH notice number reference in 3-II.C. from PIH Notice 2012-10 to 2018-24.

### **CURRENT:**

#### **Page 3-26 3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(A)]**

Updated the last sentence to read correctly.

### **PHA Policy**

The PHA will admit an otherwise-eligible family who was evicted from federally assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household. The PHA determines that any household member is currently engaged in the use of illegal drugs.

### **PROPOSED:**

The PHA will admit an otherwise-eligible family who was evicted from federally assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household. The PHA will propose denial of admission if it determines that any household member is currently engaged in the use of illegal drugs.

### **PROPOSED:**

#### **Page 4-3 4-I.B. APPLYING FOR ASSISTANCE**

Change the wording in the PHA Policy to read:

A two-step process will be used for all applications. Under the two-step application process, the PHA initially will require families to provide the information needed to make an initial assessment of the family's eligibility. If the family meets the initial eligibility requirements, the family will be invited to attend the full application interview. The PHA will advertise the date and time applications are accepted, as well as all documentation the family must provide to apply.

### **CURRENT:**

A two-step process will be used for all applications. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility. The family will be invited to attend the full application interview according to pre-application date and time at which time they will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list. Families may complete an online pre-application at [www.lmha.org](http://www.lmha.org) when the waiting list is open. Applicants needing assistance may visit our office at 1600 Kansas Ave, Lorain during business hours and use a kiosk to complete the pre-application.

### **PROPOSED:**

#### **Page 4-5 4.I.D. PLACEMENT ON THE WAITING LIST, Eligible for Placement on the Waiting List**

Modify PHA Policy to read:

The PHA will send written notification of the preliminary eligibility determination within 10 business days of verifying if all eligibility requirements have been met.

Applicants must continue to meet all eligibility criteria while on the waiting list. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to the date and time of application and any preference(s) for which they qualify when they are in effect. Currently, LMHA does not have any active preferences.

B.1b

**Housing Choice Voucher Program Administrative Plan Changes (continued)**

**CURRENT:**

The PHA will send written notification of the preliminary eligibility determination within 10 business days of verifying all eligibility requirements have been met.

Placement on the waiting list does not indicate that the family will, in fact, remain eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to any preference(s) for which they qualify when they are in effect, and the date and time their e-pre-application is received by the PHA. Currently, LMHA does not have any active preferences.

**PROPOSED:**

**Page 4-8 Reopening the Waiting List**

**PHA Policy**

The PHA will give public notice by publishing the relevant information in suitable media outlets that may include, but not limited to: Chronicle-Telegram, Lorain Morning Journal, La Prensa, North Coast Latino, The Senior Years, Town Money Save, Lorain County Magazine, La Mega radio, WOBL, LMHA website, LMHA social media.

**CURRENT:**

**Page 4-8 Reopening the Waiting List**

**PHA Policy**

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

**PROPOSED:**

**Page 4-13 Special Admissions**

Adding the following PHA Policy:

The PHA will work with Lorain County Children Services (LCCS) to administer Tenant Protection Vouchers for Foster Youth to Independence (TPV/FYI). If awarded, these vouchers are for youth 18 years of age to 24 years of age, who are working with LCCC who have left foster care, or will leave foster care within 90 days or who are homeless or at risk of becoming homeless. As required by statute, a TPV/FYI voucher issued to a youth may only be used to provide housing assistance for a maximum of 36 months, unless authorized by HUD.

**Page 4-13 Targeted Funding**

Add Tenant Protection Vouchers, including those for Foster Youth to Independence

**PROPOSED:**

**Page 4-16 4-III.C. SELECTION METHOD, Order of Selection**

Change the word "pre-application" to "application" in the PHA Policy, first paragraph, last sentence.

**PROPOSED:**

**Page 4-17 4-III.E. THE APPLICATION INTERVIEW**

Change the PHA Policy to read:

Families are required to participate in a private eligibility interview to be placed on the waiting list.

All adult members of the household must attend the interview together.

The interview will be conducted only if all adult members provide appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity) and current, government issued photo id. If the family does not provide the required documentation, the applicant family may return on the next day applications are accepted.

The family must provide all the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. Applications cannot be submitted without the minimum required documents listed in the waiting list opening advertisement.

Any additional documents or information requested by the PHA at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

**CURRENT:**

Families who complete a pre-application are required to participate in an eligibility interview to be placed on the waiting list.

All adult members of the household must attend the interview together. The head of household or spouse/cohead must provide acceptable documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity.) If the family representative does not provide the required documentation at the time of the interview, he or she will be required to provide it within 10 business days.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

B.1b

**Housing Choice Voucher Program Administrative Plan Changes (continued)**

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice that they are being removed from the waiting list. When a family is removed from the waiting list due to 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.

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will be sent a letter advising the family they have been removed from the waiting list. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore, no informal hearing is required.

**PROPOSED:**

**Page 5-12**

Add "Persons of different generations (defined as 7 years) and unrelated adults will not be required to share a bedroom, except: A newborn child of a resident may share a bedroom with the single parent resident up to age two."

Add "No additional bedrooms will be provided for the live-in aide's family".

Add "Children related to a household member by legal custody, adoption or court awarded custody will be considered when determining voucher size.

Children for which there is a shared parenting agreement at least 50% of the time or proof the head of household is seeking custody may, at LMHA's discretion, be considered when determining voucher size by occupancy standards. Such children not listed on the lease agreement or count toward eligible household deductions.

Foster children will be considered when determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on the PHA's occupancy standards.

Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining voucher size.

Add 6 Bedrooms - 8-12 persons in household.

**PROPOSED:**

**Page 6-21:**

Correct "HVC" to "HCV"

**PROPOSED:**

**Page 6-26**

Updated PIH notice number reference in last paragraph on page from 2012-10 to 2018-24.

**PROPOSED:**

**Page 6-35**

Add "(aa) Distributions from an ABLÉ account, and actual or imputed interest on the ABLÉ account balance" to "Additional Exclusions From Annual Income".

**PROPOSED:**

**Page 6-59**

Delete 24 CFR 982.517(d)(2) reference and add HCV GB, p.18-8 reference.

**PROPOSED:**

**Page 7-1**

Changed PIH notice in title of Chapter 7, in 2<sup>nd</sup> paragraph on p. 7-1, from PIH 2010-19 to 2018-18.

Updated PIH notice number reference in second paragraph on page from 2010-19 to 2018-18.

**Page 7-2**

Updated PIH notice number reference in "HUD's Verification..." from 2010-19 to 2018-18.

**Page 7-3**

Updated PIH notice number reference in 2010-19 to 2018-18 in second paragraph.

B.1b

**Housing Choice Voucher Program Administrative Plan Changes (continued)**

**Page 7-4**

Added or changed text regarding “IVT” reports in “EIV Income” in the subheading and throughout the PHA policy.

**Page 7-5**

Updated PIH notice number reference in second paragraph from 2012-10 to 2018-18.

**Page 7-6**

Updated PIH notice number reference in subheading of “Written Third-Party Verification” from 2010-19 to 2018-18.

**Page 7-7**

Updated PIH notice number reference in subheading of “Oral Third-Party Verification” from 2010-19 to 2018-18.

**Page 7-8**

Updated PIH notice number reference in subheading of “When Third-Party Verification is Not Required” from 2010-19 to 2018-18.

**Page 7-12 7-IIB. SOCIAL SECURITY NUMBERS**

Updated PIH notice number reference in heading from 2012-10 to 2018-24.

**PROPOSED**

**Page 8-19**

Added PIH notice references at end of 1<sup>st</sup> paragraph under “Units that Must Not Be Used as Comparables”.

**PROPOSED**

**Page 9-4 PHA Policy under 9-I.B. Requesting Tenancy Approval [Form HUD-52517]**

Add (including the proposed dwelling lease). To read “Completed RTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, by mail, by email or by fax”.

**CURRENT:**

**Page 9-4**

Completed RTA must be submitted as hard copies, in-person, by mail, by email or by fax.

**PROPOSED:**

**Page 9-11 PHA Review of Lease**

**PHA Policy**

Add “by email” to read “Missing and corrected lease information will only be accepted as hard copies, in-person, by email, by email or by fax”.

**CURRENT**

**Page 9-11**

**PHA Policy**

Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, by email or by fax.

**PROPOSED**

**Page 9-12 9-I.F. TENANCY APPROVAL**

**PHA Policy**

Add “by email” to read “Correction to the RTA will only be accepted as hard copies, in-person, by mail, over the phone, by email or by fax.”

**CURRENT:**

**Page 9-12 9-I.F. TENANCY APPROVAL**

**PHA Policy**

Corrections to the RTA will only be accepted as hard copies, in-person, by mail, over the phone or by fax.

**PROPOSED:**

**Page 10-6 Housing Assistance Payments**

Add new “HAP Families Who Wish to Move” subsection, with new PHA Policy.

**Zero HAP Families Who Wish to Move [24 CFR 982.455]**

A participant who is not receiving any subsidy, but whose HAP contract is still in force, may request a voucher to move to a different unit. The PHA must issue a voucher to move unless it has grounds to deny assistance under the program regulations. However, if the PHA determines no subsidy would be paid at the new unit, the PHA may refuse to enter into a HAP contract on behalf of the family.

**PHA Policy**

If a zero HAP family requests to move to a new unit, the family may request a voucher to move. However, if no subsidy will be paid at the unit to which the family requests to move, the PHA will not enter into a HAP contract on behalf of the family for the new unit.

B.1b

**Housing Choice Voucher Program Administrative Plan Changes (continued)**

**PROPOSED:**

**Page 10-11 Preapproval Contact with the Receiving PHA**

Correct formatting of “email” text in paragraph and PHA Policy under “Preapproval Contact with the Receiving PHA” and in PHA Policy under “Initial Notification to the Receiving PHA”.

**PROPOSED:**

**Page 10-15**

Correct formatting of “email” text in PHA Policy under “Responding to Initial PHA’s Request”.

**PROPOSED:**

**Page 10-19**

Correct formatting of “email” text in paragraph and PHA Policy under “Initial Billing Deadline”.

**PROPOSED:**

**Page 11-13 Required Reporting**

Add additional language for when the PHA will conduct an interim certification to read:

**PHA Policy**

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 share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination;
- Families participating in quarterly reporting;
- Families whose unemployment benefits ends and the participant has started another job;
- Families on layoff, temporary disability, summer vacation (ie. School employee where income is not annualized) or medical leave returns to the same employer or job;
- A FSS participant requesting in writing that an interim certification be completed
- Changes in household composition, with or without additional income

**CURRENT:**

**Page 11-13 Required Reporting**

**PHA Policy**

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 share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

The PHA will conduct interim reexaminations for participants on quarterly reporting.

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

**PROPOSED:**

**Page 12-3**

Updated PIH notice in 2<sup>nd</sup> subheading “Failure to Disclose and Document Social Security Numbers” from PIH 2012-10 to 2018-24.

**PROPOSED:**

**Page 12-23**

Added text in 1<sup>st</sup> paragraph in PHA Policy under “EXHIBIT 12-1: STATEMENT OF FAMILY OBLIGATIONS” to read:

The PHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction or an owner’s notice to evict, police reports, and affidavits from the owner, neighbors, or other credible parties with direct knowledge.

**CURRENT:**

**Page 12-23**

**PHA Policy**

The PHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction or an owner’s notice to evict.

**PROPOSED:**

**Page 13-5**

**PHA Policy**

Correct the language in the last paragraph under 13-I.B. BASIC HCV PROGRAM REQUIREMENT from “annually” to “biennially” to read “The PHA will inspect the owner’s dwelling unit as least biennially to ensure that the unit continues to meet HQS requirements”

B.1b

**Housing Choice Voucher Program Administrative Plan Changes (continued)**

**CURRENT:**

**Page 13-5**

The PHA will inspect the owner's dwelling unit at least biennially to ensure that the unit continues to meet HQS requirements.

**PROPOSED:**

**Page 13-16 Owner Certification of Compliance**

Remove "endorsing the monthly check" and add "accepting the monthly HAP" in the second paragraph to read "By accepting the monthly HAP from the PA, the owner certifies to compliance with the terms of the HAP contract."

**CURRENT:**

**Page 13-16**

By endorsing the monthly check from the PHA, the owner certifies to compliance with the terms of the HAP contract.

**PROPOSED:**

**Page 14-10 14-I.L.C. OWNER-CAUSED ERROR OR PROGRAM ABUSE**

Add two new paragraphs under PHA Policy under Prohibited Owner Actions.

Committing sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2

Retaliating against any applicant or participant reporting/alleging sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2

**PROPOSED:**

**Page 15-1**

Add "Families will be permitted to use the homeownership and manufactured homes options."

**PROPOSED:**

**Page 16-7**

Added missing "24 CFR" text to reference in first heading to read "Exception Payment Standards [24 CFR.982.503(c)]."

**CURRENT**

**Page 16-7**

Exception Payment Standards [982.503(c)]

**PROPOSED**

**Page 16-7**

Add new language and subheading and PHA Policy under Exception Payment Standards to read:

Voluntary Use of Small Area FMRs [24 CFR 982.503, Notice PIH 2018-01]

PHAs that administer vouchers in a metropolitan area where the adoption of small area FMRs (SAFMRs) is not required may request approval from HUD to voluntarily adopt SAFMRs. SAFMRs may be voluntarily adopted for one or more zip code areas.

PHA Policy

The PHA will not voluntarily adopt the use of SAFMRs.

**PROPOSED**

**Page 16-14**

Change 10 to 14 business days for written decision of an informal review.

**PROPOSED**

**Page 16-20**

Add "legal" to the third bullet point to read "The participant's counsel or other legal representative".

**PROPOSED**

**Page 16-22**

Change 10 business days to 14 business days for written hearing decision.

**PROPOSED**

**Page 16-63**

Add "Lorain Metropolitan Housing Authority" as the covered housing provider.

**PROPOSED**

**Chapter 17 Project-Based Vouchers**

Adopt the Nan McKay Model Admin Plan Chapter for Project-Based Vouchers. Refer to the entire chapter in the Administrative Plan.

**B.1b**

**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))

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.

Grievances must be presented within 10 business days after the occurrence of the event giving rise to the grievance. Management has 14 business days to hold or schedule an informal settlement conference, and 14 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 14 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 14 business days of Complainant's request. The hearing officer shall issue a written decision, together with the reasons for the decision within 14 business days after the completion of the hearing.

**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))

LMHA's Housing Choice Voucher Home Ownership Program has 85 active participants and has assisted 180 participants in purchasing homes since the program's inception. Nine (9) participants became new homeowners in 2019, exceeding the goal of seven (7). LMHA has a goal of seven (7) new homeowners in 2020.

HUD's Housing Counseling program provides counseling to FSS and Homeownership participants on seeking, financing, maintaining, and owning a home. The program also assists homeownership program homeowners in need of foreclosure assistance. Counseling is provided by HUD-approved housing counseling agencies. Counseling sessions include, but are not limited to, money management and budget development, credit counseling, and analysis of individual financial profiles aimed at bring clients closer to achieving their dream of homeownership.

In order to maintain our HUD approved status, LMHA must have 30 clients participating in housing counseling and education classes each year. In 2019, LMHA had 64 participants attend homebuyer education and 30 clients receiving one-on-one housing counseling. The households served by purpose are as follow; pre-purchase / home buying – 19, non-delinquency post-purchase - 8, resolving or preventing mortgage delinquency – 3.

**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))

**Community Service**

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.

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.

On an annual basis, at the time of lease renewal, the PHA will notify the family in writing of the family members who are subject to the community service requirement.

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.

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).

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.

LMHA changed the CSSR policy July 1, 2018 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.

As of December 31, 2019, more than 20% (368) of public housing adults between the ages of 18 and 65 are required to perform community service.

**Family Self Sufficiency**

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.

**B1.b**

**Community Service and Self Sufficiency Programs, continued**

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.

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.

**LMHA's Public Housing FSS program statistics for January 1, 2018 thru December 31, 2018:**

- 72 current PH FSS Participants
- 51 are currently employed at least part time
- 33 new participants were added
- 9 graduated from the program with final disbursements totaling: \$44,416.67
- 33 have positive escrow accounts totaling \$78,182.94
- 13 started new escrow accounts
- 17 restarted or had an increase in their monthly escrow deposit amounts
- 18 started new jobs
- 15 received a promotion/increase wages
- 42 took part in job prep activities
- 22 have a degree and or professional certificates
- 12 are pursuing their Associate's degrees or Bachelor's degree
- 69% of PH FSS of participants were employed on average in 2018
- Highest Disbursement check total \$11,690.67
- 102 PH FSS Participants received case management in 2018

**LMHA's Public Housing FSS program statistics for January 1, 2019 thru December 31, 2019:**

- 74 current PH FSS Participants
- 58 are currently employed at least part time
- 25 new participants were added
- 13 graduated from the program with final disbursements totaling: \$ 73,110.70
- 41 have positive escrow accounts totaling \$ 66,837.91
- 27 started new escrow accounts
- 8 restarted or had an increase in their monthly escrow deposit amounts
- 18 started new jobs
- 9 received a promotion/increase wages
- 34 took part in job prep activities
- 26 have a degree and or professional certificates
- 11 are pursuing their Associate's degrees or Bachelor's degree
- 75% of PH FSS of participants were employed on average in 2019
- Highest Disbursement check total \$ 10,879.16
- 97 PH FSS Participants received case management in 2019

**LMHA's Housing Choice Voucher FSS program statistics for January 1, 2018 thru December 31, 2018:**

- 46 current HCVFSS participants
- 20 new participants added
- 11 graduated with final escrow disbursements totaling \$48,213.93
- 5 have gone totally off assistance
- 24 have positive escrow accounts totaling \$65,166.91
- 5 new accounts established this year
- 10 increased their escrow deposits due to higher earned income
- 31 are employed
- 16 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 4 continues to work on her General Education Diploma (GED)
- 9 are enrolled in college
- 6 have Associate's Degrees
- 1 has a Master's Degree
- Highest Disbursement check total \$15,533.49

**B1.b Community Service and Self Sufficiency Programs, continued**

**LMHA's Housing Choice Voucher FSS program statistics for January 1, 2019 thru December 31, 2019:**

- 62 current HCV FSS participants
- 29 new participants added
- 8 graduated with final escrow disbursements totaling \$22,871.63
- 4 have gone over-income and are not receiving any HAP
- 32 have positive escrow accounts totaling \$69,121.49
- 20 new accounts established this year
- 5 increased their escrow deposits due to higher earned income
- 48 are employed
- 30 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 6 continues to work on her General Education Diploma (GED)
- 17 are enrolled in college
- 11 have Associate's Degrees (2 earned in 2019)
- 1 have a Bachelor's Degree (earned in 2019)
- 1 has a Master's Degree
- Highest Disbursement check total \$8,727.66.

**Resident Services Coordination**

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.

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, El Centro, Lorain County Community College, Department of Veteran Affairs, The Child Care Resource Center, Lorain County JVS, Goodwill, and an LMHA Resident.

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.

Following are descriptions of services and amenities offered to assisted families by LMHA:

- Family Self Sufficiency (FSS) programming for LMHA public housing and HCVP residents
- HCVP Home Ownership Option Program
- Resident Service Coordinator on staff to connect the residents with social service agencies to address their needs
- Public Housing residents were assisted by the Service Coordinator via referrals, surveys, and hardship rent exemptions.
- Nearly 63% of the Service Coordinator's open rent exemption cases that were closed in 2019 were closed due to an increase in resident's income
- 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
- 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
- Green Thumb flower and garden program has inspired residents to take an interest in the beautification of their homes and gardens, and encourage planting of annual and perennial flowers plus urban vegetable gardens. More than 32 individuals participated in 2019 agency wide. Families also cared for community gardens located at Westview, Wilkes, and Southside.
- Computer labs are available at several LMHA public housing high rises giving residents computer and internet access to look for employment, complete online applications, send/receive emails, etc. Computer kiosks are also available in the LMHA main office lobby.
- Resident Assistance Watch (RAW) programs to engage public housing residents in monitoring their properties. Residents can earn community service hours while participating. RAW membership is active at various LMHA high rises.
- 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.
- LMHA is a Certified Credit Counseling agency
- LMHA conducts Homebuyer's Education Classes which fulfill HUD Approved Pre-Purchase Housing Counseling
- Food pantry is established at Westview Terrace the last Friday of every month in collaboration with Vine of Hope
- Boys and Girls Club: On site at Westview Terrace provides childcare for 37 children, 37 of whom reside with the Housing Authority
- Boys and Girls Club: On-site at Southside Gardens provides childcare for 60 children, 35 of whom reside with the Housing Authority
- Domestic Violence Awareness task force in collaboration with the Genesis House
- LMHA served as a Mary Lee Tucker application center to provide clothing for families
- Lorain County Health and Dentistry operates a medical and dental center in Wilkes Villa for residents and the general public
- Horizon Day Care facility in Wilkes Villa provides day care to residents and employment opportunities. As of December 31, 2019 there were 64 children who reside at Wilkes Villa served by/enrolled at Horizon.
- 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
- Offer Financial Assistance for Education to assist residents to improve work skills and achieve individual and educational goals

B1.b

**Community Service and Self Sufficiency Programs, continued**

**Resident Services Coordination, continued**

- LMHA hosts the annual HUD Strong Families initiative public housing properties, which focuses on both the parents and the guardians to connect families to resources that will aid in improving the families' outcomes and unify the family and providing parents and guardians available resource information from different community organizations who also attend the event. In 2017 the event was held at Southside Garden, in 2018 at Wilkes Villa, in 2019 it was at Leavitt Homes/Westview Terrace, and in 2020 it is anticipated to be held at Southside Gardens. In 2019, 263 residents attended the event at Leavitt/Westview.
- Publishes a bi-monthly newspaper to keep public housing residents informed on available housing and community programs
- Binders with community resource information are accessible to public housing residents through each development's Management office
- 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
- Residents at various LMHA properties are offered twice-monthly shuttle services to local supportive service agencies and shopping locations
- In collaboration with local supportive and faith-based organizations, holiday meals were provided to residents throughout LMHA properties
- LMHA participated in an eviction prevention program in collaboration with United Way and their UCAN Collaborative to assist Public Housing residents who were recently unemployed or under-employed
- LMHA participated in the Tenant Based Rental Assistance (TBRA) program for HCVP participants to assist with security deposits & utilities
- LMHA has partnered up with the Child Care Resource Center to promote and give information about Parent Café's that are held all through Lorain County. Parent Cafés are proven to reduce child abuse and give awareness and education to parents about child development, parent resiliency, concrete supports in times of need, social and emotional competence of children, and social connections.
- Lorain County General Health District collaborative: Smoking cessation
- Lorain County Homeless Task Force
- Lorain County Goodwill: Job Club
- Ohio Means Jobs: Employment Opportunities
- Catholic Charities: Resources
- Lorain County Harvest for Hunger: Non-perishable food collection
- Lorain County Health and Dentistry is on-site at Wilkes Villa and also located close to Lakeview Plaza, Kennedy Plaza, and John Frederick Oberlin Homes
- Over 130 individuals, including 39 veterans, were served at the Lorain County Homeless Stand Down, where LMHA representatives were on site equipped with computers to assisted approximately 20 homeless individuals with applying for housing
- High rise residents were served holiday food boxes through a partnership with Salvation Army at Riverview and Harr Plaza
- As part of the Little Free Library Initiative, 4 LMHA Public Housing properties have Little Free Libraries on site stocked with books to promote literacy and the love of reading
- Second Harvest provided Housing Authority 87 individuals at Riverview, Kennedy, International, and Harr Plazas with monthly Senior Food Boxes
- Invest Elyria assisted with providing 557 Housing Authority residents, including 224 children, were served in 2018 by the Mobile Market Food Pantries at Wilkes Villa, Riverview, and Harr Plaza
- In 2019 Invest Elyria assisted a total of 346 families which included 30 senior citizens, 457 adults, and 620 children with the food pantry that is located at Wilkes Villa. Also, the Invest Elyria Mobile Market Food Pantry assisted a total of 50 households at Harr and Riverview with cleaning supplies or hygiene products
- 40 turkeys were provided to the residents at Wilkes Villa by Buckeye Healthcare

**B1.b**

**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, 452, or 6.8%, of the 6626 cases occurred among the 948 housing units in Lorain. (In 2018, these numbers were 356, or 5%, of 7023 reports. In 2017, these numbers were 729, or 10%, of 7287 reports.) Statistics from the Elyria Police Department show that of all the police calls for service in the city of Elyria, 988, or 2.7%, of the 36409 calls for service occurred among the 452 housing units in Elyria. (In 2018, the counts were 160, or 3%, of the 5421 reports. In 2017, these numbers were 126, or 2.25%, of 5594 reports. In both 2017 and 2018, these statistics did not include all calls for service as accounted for in 2019, but only police reports and criminal violations were counted.)

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 24<sup>th</sup> 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 upon request or as needed based upon reported drug activity.

Residents are provided Hot Spot cards to facilitate anonymous reporting of suspicious and criminal activity. In calendar year 2019, LMHA received 21 Hot Spot cards and dozens of reports issued by personal letters, emails, voice mail messages, and the "Fraud Complaint" hotline on the LMHA website. Eighteen (18) households were evicted from public housing in calendar year 2019 due to criminal or drug related activities. In 2018, there were 32 Hot Spot cards and 11 evictions.

LMHA hired part-time receptionists to work from 9:00 p.m. to 3:00 a.m. on weekends at Lakeview Plaza and Riverview Plaza in an effort to control access to the buildings. Though this helped to some extent, it was difficult to retain employees for these late night shifts. LMHA then contracted with the Lorain Police Auxiliary to patrol Lakeview Plaza 7 nights per week from 8:00 p.m. to 4:00 a.m. The Auxiliary Officers monitor the entrances to the building, and make periodic patrols of the floors, stairwells, and exterior. These patrols have had a positive impact on reducing problems.

LMHA's Criminal Investigator began holding office hours at each property (2 – 4 hours per month) to increase visibility, engage with residents and employees one-on-one, and develop a rapport to encourage open communications and sharing of information.

LMHA was awarded a \$250,000 Emergency Safety and Security Grant (ESSG) for improvements for safety and security measures at Lakeview Plaza. The project includes installation of:

- more than 70 interior and exterior cameras to view and record activities where the criminal or illicit behaviors occur most frequently: parking lots, stairwells, laundry rooms, hallways, common areas, entrances;
- Digital Video Recording systems are capable of 30-days of storage with the ability to easily download for evidence;
- Interior and exterior lighting to improve camera viewing and recording ability, to enhance safety, and to deter loitering at night;
- intercom entry systems in the south foyer to connect with each apartment and the management office;

replacement exterior doors and locks.

In calendar year 2019, LMHA applied for the ESSG for Riverview Plaza. Although the application was deemed complete and acceptable, it was not selected in the lottery. Because the need persists, LMHA moved forward with the project utilizing 2018 Capital Funds.

In calendar year 2020, LMHA will apply for the ESSG for Kennedy Plaza, Leavitt Homes, Westview Terrace, and Westgate Apartments. If LMHA is not successful, it will move forward with these projects using 2019 Capital Funds.

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 Criminal Investigator when any report is generated at any LMHA address in the City of Lorain. Elyria Police Department also notifies the Investigator of any criminal activity occurring on LMHA properties in Elyria. Monthly police activity /patrol sheets are submitted to Investigator where patrols and incidents for the 30 day period are documented. The Investigator also coordinates activities with the Marshall Service, local narcotic bureaus, and detective bureaus. The Investigator and Executive Director meet at least 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.

**B1.b** 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.<br>2800 Pearl Avenue<br>Lorain, Ohio 44055<br>440.277.8235  | Genesis House (Lorain County Safe Harbor)<br>PO Box 718<br>Lorain, OH 44052<br>24-hour Hotline: 440.244.1853; 440.323.3400                                    | Pathways Counseling & Growth Center<br>312 Third Street<br>Elyria, OH 44035<br>440.323.5707 |
| Lorain County Board of Mental Health<br>1173 North Ridge Road, East<br>Lorain, OH 44055<br>440.233.2020<br>24/7 Emergency/Crisis Hotline: 800.888.6161 | Nord Center<br>6140 South Broadway Avenue<br>Lorain, OH 44053<br>24/7 Emergency/Crisis Hotline: 800.888.6161<br>Sexual Assault Services Hotline: 440.204.4359 | Far West Center/Amherst<br>554 N. Leavitt Road<br>Amherst, OH 44001<br>440.988.4900         |
| Far West Center/Westlake<br>29133 Health Campus Drive<br>Westlake, OH 44145<br>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>.

**B1.b**

**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 is not proposing any changes to the pet 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.

**B1.c**

(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 903 Subpart 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

**B.1c**

**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 2 properties with average household incomes below the EIR: Wilkes Villa (\$566 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. No properties were above EIR.

In calendar year 2015, the EIR range was \$7453 to \$10,084, with the average family income PHA-wide of \$8769. 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). No properties were above EIR.

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. No properties were above EIR.

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

In calendar year 2018, the EIR range was \$8285 to \$11,209 with the average annual family income PHA-wide of \$9747. There were 4 properties with average annual family incomes below EIR: Leavitt Homes (\$37 below EIR), with 43 households (22%) having zero income; Kennedy Plaza (\$204 below EIR), with 34 households (20%) having zero income; Westview Terrace (\$908 below EIR), with 38 households (27%) having zero income; Westgate Apartments (\$189 below EIR), with 1 of 12 households having zero income; 6 have an average income of \$1450. With only 12 units at Westgate Apartments, the averages are easily skewed by only a few families. No properties were above EIR.

In calendar year 2019, the EIR range was \$8,414 to \$11,384 with the average annual family income PHA-wide of \$9,899. There were 3 properties with average annual family incomes below EIR: Riverview Plaza (\$84 below EIR), with 34 households (23.3%) having zero income; Wilkes Villa (\$196 below EIR), with 52 households (30.8%) having zero income; Westgate Apartments (\$4955 below EIR), with 4 of 12 (33.3%) households having zero income, and 3 households have an income under \$1000/year. No properties were above 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.

In 2018, 87% of applicants for public housing were ELI; 19.7% of PH households have zero income.

In 2019, 88.6% of applicants for public housing were ELI; 19.7% 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 87% of the public housing households being ELI, nearly 20% 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.

<p><b>B.2</b></p> <p><b>B.2a</b></p> <p><b>B.2b</b></p>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p> <p><b><u>OVERVIEW</u></b></p> <p>LMHA will solicit for consultant(s) to assist the Housing Authority in researching the possible courses of action and making recommendations for redeveloping two of its public housing properties, Wilkes Villa and Southside Gardens. LMHA also intends to solicit for architects or urban planners to revise its Master Plans for the properties.</p> <p>LMHA will consider other funding sources for the purposes of redevelopment, such as Mixed Finance Modernization or Development, Capital Fund Financing Program, Choice Neighborhood Planning and Implementation Grants, Conversion of Public Housing to Project-Based Assistance under RAD, HOME, Low Income Housing Tax Credits, Emergency Safety and Security Grants, etc.</p> <p><b><u>CHOICE NEIGHBORHOODS</u></b></p> <p>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.</p> <p>LMHA is considering submission of an application for a Choice Neighborhoods Planning Grant for redevelopment planning for Southside Gardens (OH012-13 and OH012-14) for approximately 105 units and/or Wilkes Villa (OH12-03) for 150 units in future fiscal years.</p> <p><b><u>MIXED FINANCE MODERNIZATION OR DEVELOPMENT</u></b></p> <p>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.</p> <p><b><u>MIXED FINANCE MODERNIZATION: LMHA Oberlin Homes Low Income Housing Tax Credit (LIHTC) units</u></b></p> <p>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 (OH01200004) 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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**B.2b**

The units approved for disposition were:

- 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 30<sup>th</sup> 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.

**B.2b 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.

**Lakeview Plaza:** On June 6, 2014, LMHA submitted to HUD an Acquisition Proposal to acquire 701 Sixth Ct., 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 intends to apply for future Choice Neighborhood Planning Grants, most likely in calendar year 2019.

**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-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.

LMHA implemented smoke-free 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 will 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. Selected projects will comply with the goal of expanding the supply of affordable housing and promoting deconcentration of poverty and generally provide increased housing and economic opportunities.

In addition, LMHA has tentatively determined that up to 300 vouchers could be project-based in the Plan year for PHA-owned units.

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 2019-2020 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.

LMHA has proposed to utilize project-based vouchers to convert two existing public housing developments that are located in Lorain and Elyria. LMHA includes language in the Administrative Plan regarding deconcentration efforts and general locations other than Lorain and Elyria.

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, and for Permanent Supportive Housing.

**CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED ASSISTANCE UNDER RAD**

The public housing properties with greatest need of redevelopment are Southside Gardens in Lorain and Wilkes Villa in Elyria. Because of the challenges in financing the demolition and reconstruction of functionally obsolete properties, LMHA is considering all possible avenues to finance the projects. Therefore, LMHA is considering applying for the Rental Assistance Demonstration (RAD) program to assist in funding these projects.

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**

<b>Bldg nos.</b>	<b>PIC Bldg No.</b>	<b>Location</b>	<b>Building Type</b>	<b>No. BR</b>
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)**

<b>Bldg nos.</b>	<b>PIC Bldg No.</b>	<b>Location</b>	<b>Building Type</b>	<b>No. BR</b>
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>B.2b</b>	<p>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:</p> <p style="text-align: center;"><b>Southside Gardens OH012-13; 20 buildings, 50 units; Construction Date: 1/31/1972</b></p> <table border="1"> <thead> <tr> <th>Bldg nos.</th> <th>PIC Bldg No.</th> <th colspan="2">Address</th> <th>Building Type</th> <th>No. BR</th> </tr> </thead> <tbody> <tr><td>48</td><td>013001</td><td>1613 E. 30TH ST.</td><td>LORAIN</td><td>Single Family/Detached</td><td>6</td></tr> <tr><td rowspan="4">49</td><td>013002</td><td>1615 E. 30TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>3</td></tr> <tr><td>013002</td><td>1617 E. 30TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>3</td></tr> <tr><td>013002</td><td>1619 E. 30TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>3</td></tr> <tr><td>013002</td><td>1621 E. 30TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>3</td></tr> <tr><td rowspan="4">50</td><td>013003</td><td>1610 E. 29TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>2</td></tr> <tr><td>013003</td><td>1612 E. 29TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>2</td></tr> <tr><td>013003</td><td>1614 E. 29TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>2</td></tr> <tr><td>013003</td><td>1616 E. 29TH ST.</td><td>LORAIN</td><td>Row or Townhouse</td><td>2</td></tr> <tr><td rowspan="2">51</td><td>013004</td><td>1618 E. 29TH ST.</td><td>LORAIN</td><td>Semi Detached</td><td>4</td></tr> <tr><td>013004</td><td>1620 E. 29TH ST.</td><td>LORAIN</td><td>Semi Detached</td><td>4</td></tr> </tbody> </table>						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
Bldg nos.	PIC Bldg No.	Address		Building Type	No. BR																																																																		
48	013001	1613 E. 30TH ST.	LORAIN	Single Family/Detached	6																																																																		
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	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
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)**

<b>Bldg nos.</b>	<b>PIC Bldg No.</b>	<b>Address</b>	<b>Building Type</b>	<b>No. BR</b>
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 might be submitted to SAC in Fiscal Year 2021. 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.

<p><b>B.3</b></p>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>LMHA’s 5-Year Action Plan, including CFP 2020, 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 \$3 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 no 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><b>In calendar year 2019, LMHA completed \$1,291,480 in capital improvement projects agency wide.</b></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 steps towards paperless technologies for applicants, tenants, participants, and employees.</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 <a href="http://www.lmha.org/about-lmha/annual-reports/">http://www.lmha.org/about-lmha/annual-reports/</a>. 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 <a href="http://www.lmha.org/about-lmha/annual-reports/">http://www.lmha.org/about-lmha/annual-reports/</a>. Click on documents labeled “50075.1” for a particular year of interest.</p>
<p><b>B.4.</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.2	<p><b>Civil Rights Certification.</b></p> <p><a href="#">Form 50077-ST-HCV-HP</a>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>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>
C.4	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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>D</b>	<p><b>Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
D.1	<p><b>Capital Improvements.</b> 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 LMHA's 2019 5-Year Action Plan HUD Form 50075.2 approved by HUD on December 19, 2019 in EPIC.</p>

# Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing 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.

### 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.”

**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. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(1\)](#)) and 24 CFR §903.12(b). 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. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#)) and 24 CFR §903.12(b).

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.** 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 maintaining 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\(d\)](#))

**Homeownership Programs.** A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. ([24 CFR §903.7\(k\)](#)) and 24 CFR §903.12(b).

**Safety and Crime Prevention (VAWA).** 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\(n\)](#))

**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 public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); 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.

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\(b\)](#))

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements or discretionary policies 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.** 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI 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 name, 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 name, 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. 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](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**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))

**Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) 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.

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

**B.3 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.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))

## C. Other Document and/or Certification Requirements

**C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.

**C.2 Civil Rights Certification.** Form HUD-50077 SM-HP, *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))

**C.3 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)

**C.4 Certification by State or 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)

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

**D.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.”

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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. 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.

Public reporting burden for this information collection is estimated to average 16.64 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  
LORAIN METROPOLITAN HOUSING AUTHORITY  
2020 (FY21) ANNUAL PLAN, 5-YEAR PLAN, and 5-YEAR ACTION PLAN  
January 21, 2020**

The Lorain Metropolitan Housing Authority (LMHA) met with the Resident Advisory Board (RAB) on January 21, 2020 to discuss the proposed changes to the 2020 Annual Plan, Five-Year Plan, and Capital Fund Program Five-Year Action Plan. Sixteen (16) RAB members representing Public Housing, Housing Choice Voucher Program, and Section 8 New Construction (multifamily housing) participated in the meeting. LMHA was represented by nine (9) employees.

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LMHA sent drafts of the Annual Plan to the RAB members on January 6, 2020 so they had an opportunity to review them prior to the meeting and share them with their Tenant Councils and residents of the properties. LMHA discussed with the RAB each of the documents and encouraged meeting participants to ask questions or make comments at any time throughout the discussion. The summary of questions and comments and LMHA's response and actions follow.

**REVIEW OF ANNUAL PLAN PAGES 1-15 and 27-50**

**Pages 9 and 35: Deconcentration and Other Policies**

**RAB Q:** Deconcentration has been discussed a lot by LMHA today in public housing, Project Based Vouchers, and the HCV Program, so it must be very important to you. Are you very successful? What areas are promoted?

**LMHA A:** Yes, it is very important to LMHA and our Board of Commissioners. Since none LMHA's public housing properties have an average income greater than 115% of the average household income for all our public housing, and because nearly 90% of the public housing families are ELI, it is not possible to encourage lower income families to move into higher income properties. In the HCV Program, the participant has the *choice* of where they want to live. LMHA provides information to new participants and movers regarding other locations in Lorain County that have a lower concentration of voucher holders. And for the PBV program, LMHA strives to have project based voucher properties located in census tracts of no more than 20% poverty rate.

**Page 31: Safety and Crime Prevention**

**RAB Q:** There is a typo in the middle of the page. The Auxiliary Police work from 8:00 p.m. to 4:00 a.m., not 10:00 p.m.

**LMHA A:** Thank you! Change noted and corrected!

**Page 38: Site Acquisition Proposal for Lakeview Plaza**

**RAB Q:** The address for the parcel you have listed is not 701 Sixth Street, but 701 Sixth Court.

**LMHA A:** Thank you! Change noted and corrected!

**REVIEW OF CHANGES TO ACOP, PAGES 16-20 IN ANNUAL PLAN**

There were no questions or comments on the proposed changes to the ACOP.

**REVIEW OF CHANGES TO HCVP ADMINISTRATIVE PLAN, PAGES 21-26 IN ANNUAL PLAN**

**RAB Q:** You have talked a lot about Project Based Vouchers. Does it affect the total number of tenant based vouchers? How many do you plan to issue?

**LMHA A:** LMHA is permitted to allocate up to 20% (or just over 600) of our tenant based vouchers for project based. The majority of them are included in the total count of vouchers, so the number of tenant based vouchers would decrease. Some special types of projects do not impact the tenant-based voucher count. LMHA has stated we will consider up to 300 vouchers for project based programs, and up to 300 for PHA-owned units.

**REVIEW OF CHANGES TO 2020 FIVE-YEAR PLAN**

**Page 13: Progress on the goal of enhancing safety**

**RAB Q:** You've got the same typo in the middle of the page. The Auxiliary Police work from 8:00 p.m. to 4:00 a.m., not 10:00 p.m.

**LMHA A:** Thank you! Change noted and corrected!

## REVIEW OF CHANGES TO 2020 FIVE-YEAR ACTION PLAN

**RAB Q:** At International Plaza, we have a leak in the roof from that wind damage a couple weeks ago. We are still having leaks. Are there plans to fix it?

**LMHA A:** Yes, we have engaged the insurance company to review the damage. We brought in a roofer to protect the roof temporarily. Once the extent of the damage is determined and the nature of the repairs, we'll move forward.

LMHA and the RAB members further discussed the funding differences between public housing and multifamily housing, and that the 5-Year Action Plan and Capital Fund Program are for public housing units, while repairs and capital improvements for multifamily housing properties is funded by the property's reserves which is built up by rents, or that loans or mortgages are taken out similar a homeowner to fund modernization projects.

**RAB Q:** At Lakeview Plaza, are any doors being replaced in the safety and security project?

**LMHA A:** Yes, several exterior doors and the interior doors that provide access to the electrical room, boiler room, and elevators will be replaced. The entrance doors on the north side of the building will be replaced with doors similar to those installed on the south side a few years ago.

**RAB Q:** At Riverview, there are 2 entrances/exits to the parking lot. Is it possible to designate one as the entrance and one as the exit?

**LMHA A:** LMHA will consider that. It used to be like that years ago, but because the stop light is so close to the parking lot entrances/exits, it is often safer to use either one for entering.

**RAB Q:** Regarding these safety and security projects at the high rises, you said that after the new systems of cameras and intercoms are installed then LMHA will not keep receptionists to monitor the doors. But there are concerns about not having a receptionist due to tasks they do like unlocking doors & turning off an alarm.

**LMHA A:** This process is working at other sites where it's been implemented and we will discuss with the Manager to address those specific concerns at each building.