

<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires 03/31/2024</b>
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**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, including changes to these policies, 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.** The 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 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, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A. PHA Information.						
A.1	<p>PHA Name: <u>Lorain Metropolitan Housing Authority</u> PHA Code: <u>OH012</u></p> <p>PHA Type: <input checked="" type="checkbox"/> High Performer</p> <p>PHA Plan for Fiscal Year Beginning: <u>07/2023</u>:</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units: <u>1,438</u> Number of Housing Choice Vouchers (HCVs): <u>3,203 (includes 46 EHV)</u></p> <p>Total Combined: <u>4,641</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b></p> <p>LMHA posts the Annual PHA plan, the Five-Year Plan, and the Capital Fund Program 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:</p> <ul style="list-style-type: none"> <li>• LMHA (formerly LMHA’s procurement office) 1604 Kansas Avenue, Lorain, OH 44052</li> <li>• Leavitt Homes 2153 Lorain Drive, Lorain, OH 44052</li> <li>• Kennedy Plaza 1730 Broadway, Lorain, OH 44052</li> <li>• Lakeview Plaza 310 W. 7th Street, Lorain, OH 44052</li> <li>• Southside Gardens 3010 Vine Ave., Lorain, OH 44055</li> <li>• Albright Terrace 129 Milan Ave., Amherst, OH 44001</li> <li>• John Frederick Oberlin Homes 138 South Main St., Oberlin, OH 44074</li> <li>• Wilkes Villa 104 Loudon Court, Elyria, OH 44035</li> <li>• Riverview Plaza 310 East Ave., Elyria, OH 44035</li> <li>• Harr Plaza 15 Chestnut Street, Elyria, OH 44035</li> <li>• International Plaza 1825 Homewood Drive, Lorain, OH 44055</li> </ul> <p>LMHA provides the Plans to its resident councils. To obtain additional information on the policies contained in the Annual Plan, visit <a href="http://www.lmha.org">www.lmha.org</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> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p>					
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
					PH	HCV
	Lead PHA:					

**B. Plan Elements**

**B.1 Revision of Existing 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) If the PHA answered yes for any element, describe the revisions for each element below:  
**See Attachment A – for Statement of Housing Needs and Safety and Crime Prevention**

**Financial Resources:**

Financial Resources - Expended on eligible purposes.	
1	Federal Grants - Current
	Public Housing Operating Fund \$8,224,778.00
	Public Housing Capital Fund \$4,877,449.00
	HOPE VI Revitalization \$0.00
	HOPE VI Demolition \$0.00
	Annual Contributions for Section 8 Tenant Based Assistance \$26,704,573.00
	Resident Opportunity and Self-Sufficiency Grants \$137,000.00
	Community Development Block Grant \$0.00
	HOME \$0.00
	Other Federal Grants - Choice Neighborhood Planning Grant \$500,000.00
	Shelter Plus Care \$0.00
2	Prior Year Federal Grants (unobligated funds only) \$4,480,798.00
3	Public Housing Dwelling Rental Income \$2,531,503.00
	<b>\$47,456,101.00</b>

**Safety and Crime Prevention:** LMHA is planning to install new lighting and security cameras at all public housing properties.

(c) **The PHA must submit its Deconcentration Policy for Field Office Review – Attachment B**

**LMHA’s Statement of Substantial Deviation/Significant Amendment Amended by the July 2022 Annual Plan – Attachment C**

**B.2 New Activities.**

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

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Conversion of Public Housing to Tenant Based Assistance.
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Project Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

**Choice Neighborhoods:** LMHA’s Choice Neighborhood activities and planning are underway including resident and community engagement; resident and community stakeholder events are planned; resident needs assessment will be conducted and completed this year. LMHA is implementing a

Resident Ambassador Program. LMHA will issue RFPs for education and library consultants and a Master Co-developer. LMHA is also exploring options for a Relocation Specialist.

**Mixed Finance Modernization or Development:** LMHA is exploring the option of developing public housing units under the new Faircloth to RAD program.

**Project Based Vouchers:** LMHA currently has HUD-approved vouchers that may be utilized for Project Based Vouchers; LMHA may issue a rolling RFP to offer this opportunity to increase the supply of affordable housing.

**Units with Approved Vacancies for Modernization:** LMHA is exploring converting efficiency units at Kennedy Plaza and Lakeview Terrace to one-bedroom ADA Accessible units to meet the need of LMHA’s requested and approved transfer list. LMHA will submit a request for approval by HUD for modernization vacancies as applicable.

**B.3 Progress Report.**

Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

See Attachment D

**B.4. Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

**HUD approved the Capital Fund 5-Year Action Plan in EPIC on 08/25/2022**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274

Capital Fund Program - Five-Year Action Plan

**Status:** Approved                      **Approval Date:** 08/25/2022                      **Approved By:** MURRAY, BRIAN                      02/28/2022

Part I: Summary					
PHA Name : Lorain Metropolitan Housing Authority		Locality (City/County & State)			
PHA Number: OH012		X Original 5-Year Plan		Revised 5-Year Plan (Revision No:	
A.	Development Number and Name	Work Statement for Year 1 2022	Work Statement for Year 2 2023	Work Statement for Year 3 2024	Work Statement for Year 4 2025
	AUTHORITY-WIDE	\$193,635.00			\$297,749.00
	LEAVITT HOMES (OH012000001)	\$1,236,744.00	\$1,564,903.00	\$879,653.00	\$843,453.00
	LAKEVIEW PLAZA (OH012000002)	\$465,303.00	\$859,307.00	\$755,657.00	\$802,307.00
	WILKES-VILLA (OH012000003)	\$1,183,390.00	\$675,435.00	\$611,736.00	\$617,786.00
	OBERLIN HOMES (OH012000004)	\$784,034.00	\$591,676.00	\$1,325,425.00	\$1,102,676.00
	OBERLIN HOMES LIHTC (OH012000005)	\$13,245.00	\$46,395.00	\$165,245.00	\$73,745.00

**B.5 Most Recent Fiscal Year Audit.**

(a) Were there any findings in the most recent FY Audit?

Y N

(b) If yes, please describe:

<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p><b>See Attachment E</b></p>	
<b>C.2</b>	<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>C.3</b>	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><i>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>	
<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>	
<b>D.1</b>	<p><b>Affirmatively Furthering Fair Housing.</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="180 1409 1451 1858"> <tr> <td data-bbox="180 1409 1451 1858"> <p><b>Fair Housing Goal:</b></p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHAs are not required to submit an Assessment of Fair Housing following HUD's suspension of its Affirmatively Furthering Fair Housing (AFFH) rule in 2018.</p> <p>LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> <li>• Promote lower rates of crime through engagement with local police departments' efforts on community policing</li> <li>• Support and promote affordable and accessible housing</li> <li>• Annual training for staff on Fair Housing and Reasonable Accommodation Law</li> <li>• Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action</li> </ul> </td> </tr> </table>	<p><b>Fair Housing Goal:</b></p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHAs are not required to submit an Assessment of Fair Housing following HUD's suspension of its Affirmatively Furthering Fair Housing (AFFH) rule in 2018.</p> <p>LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> <li>• Promote lower rates of crime through engagement with local police departments' efforts on community policing</li> <li>• Support and promote affordable and accessible housing</li> <li>• Annual training for staff on Fair Housing and Reasonable Accommodation Law</li> <li>• Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action</li> </ul>
<p><b>Fair Housing Goal:</b></p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHAs are not required to submit an Assessment of Fair Housing following HUD's suspension of its Affirmatively Furthering Fair Housing (AFFH) rule in 2018.</p> <p>LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> <li>• Promote lower rates of crime through engagement with local police departments' efforts on community policing</li> <li>• Support and promote affordable and accessible housing</li> <li>• Annual training for staff on Fair Housing and Reasonable Accommodation Law</li> <li>• Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action</li> </ul>		

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

## A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

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. Plan Elements.

### B.1 Revision of Existing 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 and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. 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 (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(2\)\(i\)](#)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

**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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). ([Notice PIH 2011-47](#))

**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: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. 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 under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. ([24 CFR §903.7\(j\)](#))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

**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.

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

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

**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 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7 \(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

**B.5 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 Resident Advisory Board (RAB) comments.** If the RAB had comments on 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.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ 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 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* 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 certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies

designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. 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.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

#### **D. Affirmatively Furthering Fair Housing.**

##### **D.1 Affirmatively Furthering Fair Housing.**

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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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 7.02 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.

## **Attachment A**

### **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))

Since the last Annual Plan submission, LMHA was awarded 42 Emergency Housing Vouchers to assist families who were homeless or at risk of being homeless during the COVID-19 pandemic. This award enabled LMHA to engage further with the CoC to address the needs of families that are homeless or at risk of being homeless. LMHA is working with the CoC to link families with necessary support and working on outreach and engagement with Lorain County landlords to increase housing choice for voucher holders. LMHA continues to review how to best serve the need for targeted resources to meet the needs of these individuals and families.

At the end of calendar year 2022, nearly 91% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 94% of public housing residents, 89% of multifamily residents, and 77% of participants in HCVP are ELI. For comparison, approximately 15% of families in Lorain County are ELI. Approximately 19% of the public housing households (300) have zero annual income. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County. <sup>1</sup>Source for Lorain County statistics: <https://data.census.gov/cedsci/table?q=Lorain%20County,%20Ohio&t=Income%20and%20Poverty%3APoverty&tid=ACSTTY2019.S1701>

Approximately 30% 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 needs 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 (46% are elderly, 92% are persons with a disability). In LMHA's public housing, 35% of the heads of households are persons with a disability, and 15% of the heads of household are elderly.

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. LMHA processed more than 686 requests for Reasonable Accommodations annually for all housing programs in calendar year 2022.



LMHA administers 175 vouchers for persons who are Non-Elderly Disabled (NED), 117 Veterans Affairs Supportive Housing (VASH) vouchers and are housing 7 persons via the Foster Youth to Independence (FYI) initiative. LMHA had 3 referrals in 2022.

During projects involving substantial renovations, units will be constructed/renovated utilizing principles of universal design and visit ability. 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.

LMHA continues to see a greater need for accessible units in all bedroom sizes. To address this need, LMHA's intends to pursue redevelopment 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. A prototype of this design was completed and leased up in 2017 at Southside Gardens. The building 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 an average of three times. 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 was added to the 2019 5-Year Action Plan and LMHA intends to pursue this project in 2023.

The City of Elyria Consolidated Plan identifies housing issues, homelessness, and other special needs as priorities.

The plan is available at: <https://www.cityofelyria.org/wp-content/uploads/2021/03/HUD-Consolidated-Plan-5-Year-Strategic.pdf>); the **2022 Action Plan**, currently available only in draft form, is available at <https://www.cityofelyria.org/wp-content/uploads/2021/11/Draft-2022-AAP-1.pdf> .

LMHA's Annual and Capital Fund Program 5-Year Action Plans are consistent with the City's identified goals and objectives as to support housing issues, homeless, and other special needs as follows:

*Maintain, improve and expand affordable housing: improve the quality of the housing stock in the community and increase the supply of affordable, decent, safe, accessible, and sanitary housing for home-owners, renters, and home buyers.*

Goal/Strategy:

Housing Rehabilitation: Rehabilitate the existing owner-occupied and rental housing stock in the city. LMHA is proposing to rehabilitate units as needed, including, but not limited to the following: bath/plumbing, appliances, furnace replacement, electrical, light replacement, doors, windows, and radon testing.

**Housing Construction:** Increase the supply of affordable, decent, safe, accessible, and sanitary housing through new construction. LMHA is proposing to construct new housing units at Wilkes Villa which will include multiple bedroom units. The design will also integrate full mobile accessibility for approximately 10% of the units and for all units to be visitable.

**Home Ownership:** Assist low- and moderate-income households to become homeowners through credit counseling, housing counseling and financial incentives. LMHA provides homeowner counseling services. The Authority maintains a Housing Choice Voucher Program. LMHA also continues to work with current households to raise their incomes.

*Homeless Priority: There is a need for housing opportunities and services for homeless persons and persons at-risk of becoming homeless.*

**Goal/Strategy:**

**Housing Support:** Support local agencies efforts to provide emergency shelter, transitional housing, and permanent supportive housing. LMHA provides affordable housing to families/individuals at the extremely low-income range. LMHA continues to work with community partners to identify specific target populations to be served through project-based vouchers. The Authority will also issue project-based vouchers to eligible developer(s) who assist homeless persons or who have more disabling conditions that complicate a person's ability to find and maintain housing.

**Housing Development:** Support the development of housing for the homeless and disabled by nonprofit organizations and governmental agencies. LMHA provides affordable housing to those at risk for becoming homeless. LMHA is proposing to increase the number of units that are handicap accessible with a goal of establishing at least 72 mobility accessible public housing units. Further, LMHA has exceeded its goal of having 2%, or 29, units for persons with sensory impairments. LMHA has 396 (28%) of its public housing units accessible for persons with sensory {hearing) impairments.

*Other Special Needs Priority: There is a need for housing opportunities, services, and facilities for persons with special needs.*

**Goal/Strategy:**

LMHA is proposing to increase the number of units to those with special needs in the 5-year plan. In addition, LMHA's Project based Voucher Program is supporting the development of additional supportive housing.

**Housing:** Increase the supply of decent, safe, accessible, and sanitary housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation, new construction, and reasonable accommodation. LMHA will continue its efforts to rehabilitate construct and provide reasonable accommodations, as provided throughout the plan.

*Public Service Priority: There is a need to support social services, programs, and facilities for the elderly, persons with disabilities, the homeless and persons with other special needs.*

**Goal/Strategy:**

**Public Service:** Support programs for the elderly and disabled, social service programs, emergency shelter, transitional housing, and permanent supportive housing. LMHA will enhance the provision of services to residents, applicants, and the public.

LMHA’s Annual and Capital Fund Program 5-Year Action Plans also consistent with the City of Lorain's Consolidated Plan goals to improve the availability and accessibility of affordable housing for persons of low and moderate income in Lorain and to reduce homelessness.

Plan is located at: <https://www.cityoflorain.org/DocumentCenter/View/3132/Five-Year-Consolidated-Plan-20202021-20242025-and-Annual-Action-Plan-Program-Year-2020-2021>)

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.

LMHA is reviewing its portfolio and exploring collaborations with the City of Lorain to redevelop Southside Gardens (Lorain). LMHA and the City of Lorain applied for, and were awarded a Choice Neighborhood FY22 Planning Grant. The City also is exploring collaboration with the City of Elyria to develop Wilkes Villa (Elyria). Redevelopment 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 and the City of Elyria in regard to proposed projects and LMHA policies.

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.

**Waiting List Statistics:**

<b>PUBLIC HOUSING (PH) - Active on Waiting List As of 12/31/2022</b>	<b># of Families</b>	<b>% of Total Families</b>	<b>Statistics for Lorain County Households</b>
Total	63	100	
Extremely low income (<=30% AMI)	51	81	
Very low income (>30% but <=50%AMI)	7	11	
Low Income (>50% but <80% AMI)	5	8	
Families with children <sup>4</sup>	42	67	
Elderly families	4	6	
Families with Disabilities	24	38	
Female HOH	55	87	
Hispanic	25	40	
White	33	52	
Black/African American	21	33	
American Indian/Alaska Native	3	5	
Asian	0	0	
Native Hawaiian/other Pacific Islander	1	2	
Multi-racial	5	8	

**NOTE:** LMHA is currently accepting PH applications for bedroom sizes 0, 1, 2, 3, 4, 5, and 6.

<b>PUBLIC HOUSING (PH) APPLICANTS not yet processed for eligibility As of 12/31/2022</b>	<b># of Families</b>	<b>% of Total Families</b>
Total	238	100
Female HOH	155	65
Hispanic	52	22
White	100	42
Black/African American	74	31
American Indian/Alaska Native	1	0
Asian	0	0
Native Hawaiian/other Pacific Islander	2	1
Multi-racial	9	4
Not reported	50	21

<b>Housing Choice Voucher Program Waiting List As of 12/31/2022</b>	<b># of Families</b>	<b>% of Families</b>	<b>Statistics for Lorain County Households</b>
Total	126	100	
Extremely low income	101	80	
Very Low Income	22	17	
Low Income	1	1	
Families with children	85	67	
Elderly families	10	8	
Families with disabilities	35	28	
Female HOH	116	92	
Hispanic	47	37	
White	67	53	
Black/African American	48	38	
American Indian/Alaska Native	1	1	
Asian	0	0	
Native Hawaiian/other Pacific Islander	0	0	
Multi-racial	5	4	
Not reported	2	2	

<b>MULTIFAMILY HOUSING APPLICANTS (Harr and International Plazas) As of 12/31/2022</b>	<b># of Families</b>	<b>% of Families</b>	<b>Statistics for Lorain County Households</b>
Total	22	100	
Extremely low income	19	86	
Very Low Income	2	9	
Low Income	1	5	
Families with children	0	0	
Elderly families	5	23	
Families with disabilities	19	86	
Female HOH	9	41	
Hispanic	8	36	
White	17	77	
Black/African American	5	23	
American Indian/Alaska Native	0	0	
Asian	0	0	
Native Hawaiian/other Pacific Islander	0	0	
Multi-racial	0	0	
Not reported	0	0	

<b>MULTIFAMILY HOUSING APPLICANTS not yet processed for eligibility As of 12/31/2022</b>	<b># of Families</b>	<b>% of Total Families</b>
Total	92	100
Female HOH	61	66
Hispanic	18	20
White	47	51
Black/African American	24	26
American Indian/Alaska Native	2	2
Asian	0	0
Native Hawaiian/other Pacific Islander	0	0
Multi-racial	3	3
Not reported	2	2

## Household Statistics:

<b>Public Housing Families As of 12/31/2022</b>		
	#of Families	% of Total Families
Total	1603	100
Disabled HOH	555	35
Elderly HOH	234	15
Hispanic	473	30
Non-Hispanic	1128	70
Female HOH	1166	73
Male HOH	437	27
White	919	57
Black/African American	615	38
American Indian/Alaska Native	17	1
Native Hawaiian/Other Pacific Islander	10	1
Asian	1	0
Multi-Racial	39	2
Extremely low income (ELI)	1331	83
Very low income (VLI)	149	9
Low Income (LI)	60	4
High Income	9	1
Average Household Income	12463.48	

<b>Housing Choice Voucher Program Active Participants As of 12/31/2022</b>		
Total	3438	100
Disabled HOH	1304	38
Elderly HOH	671	20
Hispanic	1004	29
Non-Hispanic	2433	71
Female HOH	2908	85
Male HOH	530	15
White	1792	52
Black/African American	1514	44
American Indian/Alaska Native	22	1
Native Hawaiian/Other Pacific Islander	29	1
Asian	1	0
Multi-Racial	79	2
Extremely low income (ELI)	2674	78
Very low income (VLI)	429	12
Low Income (LI)	89	3
High Income	7	0
Average Household Income	13748.23	

<b>Multifamily Housing Families As of 12/31/2022</b>		
Total	205	100
Disabled HOH	188	92
Elderly HOH	95	46
Hispanic	44	21
Non-Hispanic	157	77
Female HOH	90	44
Male HOH	115	56
White	141	69
Black/African American	60	29
American Indian/Alaska Native	1	0
Native Hawaiian/Other Pacific Islander	0	0
Asian	0	0
Multi-Racial	2	1
Extremely low income (ELI)	205	100

Very low income (VLI)	0	0
Low Income (LI)	0	0
High Income	0	0
Average Household Income	11,845.32	

### **Safety and Crime Prevention**

Safety and Crime Prevention Since the LMHA’s last Annual submission, LMHA has reorganized and streamlined its Safety and Crime Prevention procedures. Through reorganization, LMHA created a Security Director position and transitioned to in-house security positions. LMHA hired both full time and part time security guards. Assignments are reviewed continually to maximize security services as needed. LMHA continues to advertise and interview for security positions. The Elyria Police Department (EPD) received Project Safe Neighborhood grant for 2023 enabling them to increase presence at LMHA sites and develop resident engagement. LMHA coordinates resident meetings with the EPD. The number of meetings and engagement has been affected by the departments staffing issues, however, staffing has improved and meetings are planned.

LMHA is upgrading existing camera monitoring capabilities across its sites to further support the safety of its residents. LMHA is sensitive to the incidence of drug-related and criminal activity in the areas surrounding, adjacent to, or within some of LMHA’s properties, improved camera monitoring will deter activity and support investigation.

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 in 2022, 421, or 7.16%, of the 5,876 cases occurred among the 948 housing units in Lorain. Statistics from the Elyria Police Department show that of all the police calls for service in the city of Elyria in 2022, 174, or 3.1%, of the 5,628 calls for service occurred among the 452 housing units in Elyria.

### **Safety and Crime Prevention (VAWA)**

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 aid victims:

El Centro de Servicios Sociales Inc.  
2800 Pearl Avenue  
Lorain, Ohio 44055  
440.277.8235

Genesis House (Lorain County Safe Harbor)  
PO Box 718  
Lorain, OH 44052  
24-hour Hotline: 440.244.1853; 440.323.3400

Pathways Counseling & Growth Center  
312 Third Street  
Elyria, OH 44035  
440.323.5707

Mental Health, Addiction and Recovery  
Services (MHARS) Board of Lorain County  
1173 North Ridge Road, East  
Lorain, OH 44055  
440.233.2020  
24/7 Emergency/Crisis Hotline: 800.888.6161

Nord Center  
6140 South Broadway Avenue  
Lorain, OH 44053  
24/7 Emergency/Crisis Hotline: 800.888.6161  
Sexual Assault Services Hotline: 440.204.4359

Far West Center/Amherst  
510 N. Leavitt Road  
Amherst, OH 44001  
440.988.4900

Far West Center/Westlake  
29133 Health Campus Drive  
Westlake, OH 44145  
440.835.6212

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

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

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

## Attachment B – Deconcentration Policy and Analysis

LMHA is committed to achieving a healthy mix of incomes in its public housing developments by attracting and retaining higher income families and by working toward deconcentration of poverty goals.

### Methodology:

1. The LMHA will determine the average income of all families in all covered developments on an annual basis.
2. The LMHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.
3. The LMHA will then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1.
4. The LMHA with covered developments having average incomes outside the EIR will then determine whether or not these developments are consistent with its local goals and annual plan.
5. For developments outside the EIR the LMHA will take the following actions to provide for deconcentration of poverty and income mixing:
  - 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 may also target investment and capital improvements toward developments with an average income below the Established Income Range 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 LMHA average.
  - LMHA will consider its deconcentration goals when transfer units are offered.

### Deconcentration Analysis and Statistics

LMHA conducted the analysis below in accordance with 24 CFR Part 903 Subpart A. It is the policy of the LMHA to calculate the average income for all covered developments and LMHA does not adjust its analysis for unit size when evaluating each covered development.

Average Income for All Covered Units			
Average Income	85%	115%	Number of Units
\$12,968.09	\$11,022.88	\$14,913.30	1586



## Attachment B – Deconcentration Policy and Analysis

<b>Average Income in Each Covered Development</b>					
<b>Development Name</b>	<b>Number of Units</b>	<b>Average Income</b>	<b>% of Average Income of All Covered Developments</b>	<b>Below 85%</b>	<b>Above 115%</b>
Albright Terrace	50	\$14,222.80	110%	No	No
John Frederick Oberlin	53	\$13,582.06	105%	No	No
Kennedy Plaza	177	\$10,620.38	82%	Below	No
Lakeview Plaza	209	\$12,350.92	95%	No	No
Leavitt Homes	198	\$11,939.50	92%	No	No
Oberlin Homes	51	\$17,492.18	135%	No	Above
Riverview Plaza	180	\$11,657.00	90%	No	No
Scattered Sites	80	\$19,481.32	150%	No	Above
Southside Gardens	111	\$15,802.09	122%	No	Above
Westgate	12	\$9,560.82	74%	Below	No
Westview	143	\$10,342.60	80%	Below	No
Wilkes Villa	174	\$10,143.25	78%	Below	No

### **Strategies to impact the income targeting goals for those below 85%:**

LMHA will work with current households to raise their incomes and will target the properties with high percentages of zero-income households and which have an average household income below 85% of the LMHA average.

### **Strategies to impact the income targeting goals for those above 115%:**

LMHA will consider income targeting goals when selecting applicants from the waiting list for housing offers and when processing transfers between public housing properties.

## **LMHA's Statement of Substantial Deviation/Significant Amendment was Amended in the July 2022 Annual Plan**

### **Statement of Substantial Deviation/Significant Amendment**

The Lorain Metropolitan Housing Authority (LMHA) considers any of the following to be a substantial deviation from the Agency's Five-Year Plan and a significant amendment or modification to the Agency's Annual Plan. If any of the criteria are met, LMHA will submit a revised Plan that satisfies all public process requirements. Changes made to comply with new or revised HUD rules do not constitute significant deviation or modification from the Plans presently submitted. Revisions made to work items and activities contained in the Plan, to accommodate the loss of PFS subsidy or capital funds received from HUD as a result of inadequate appropriations, shall not be considered substantial deviation or significant modification from the present Plan.

#### **Agency Five Year Plan**

- Additions or deletions of strategic goals
- Revisions to the LMHA mission statement that deviates from the present commitments

#### **Agency Annual Plan and Capital Fund Program (CFP) Five-Year Action Plan**

- Any change to rent or admission policies or organization of waiting lists
- Any change, for purposes of the CFP, to a proposed demolition, disposition, designation of housing, homeownership programs, development, or mixed-finance proposal.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements since such changes are not considered significant.

This criterion does not supersede the requirements of OMB Circular No. A-87 (Cost Principal for State, Local, and Indian Tribal Governments) and 25 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements), as well as federal, state, or local regulations or statutes.

Any future issuance of HUD guidelines or additional regulations shall take precedence over the above criterion.

This criterion does not supersede the requirements of OMB Circular No. A-87 (Cost Principal for State, Local, and Indian Tribal Governments) and 25 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements), as well as federal, state, or local regulations or statutes.

Any future issuance of HUD guidelines or additional regulations shall take precedence over the above criterion.

## **Attachment D**

### **Goal #1: Expand the supply of affordable housing**

- LMHA's total voucher count reached 3,203
- LMHA now has a total of 117 VASH Vouchers
- LMHA has 175 vouchers for persons who are non-elderly disabled (NED)
- LMHA has 46 Emergency Housing Vouchers
- LMHA partnered with Lorain County for funding for Tenant Based Rental Assistance (TBRA) funds to assist HCVP applicants with security deposits, first month's rent and/or utility deposits in areas outside of Lorain, Elyria, and N. Ridgeville.
- LMHA partnered with the City of Elyria for funding for Tenant Based Rental Assistance (TBRA) funds to assist HCVP applicants with security deposits, first month's rent and/or utility deposits in the City of Elyria.
- Promoted communities throughout Lorain County to encourage deconcentration of low-income housing from traditional areas of poverty
- Provided 16 project-based vouchers to Faith House – 6 are online with 10 expected to be online by July 2023;
- Provided 17 project-based vouchers to Family and Community Services – units are expected to be online by December 2023;
- Provided 8 project-based vouchers to Ridgeville Farms – this project was awarded 9% tax credits in May 2023;
- Provided 8 project-based vouchers to New Sunrise Homes – this project is not yet funded;
- Provided 50 project-based vouchers to Broadway Commons a supportive housing development – this project is under planning review with the City of Lorain;
- Provided 8 project-based vouchers to South Lorain Family Apartments – this project is not yet funded;
- Provided 62 project-based vouchers to Bridge Pointe Commons supportive housing development – units were online as of June 2022;

### **Goal #2: Improve the quality of affordable housing**

- LMHA obligated \$ 465,785 in capital improvements for public housing properties;
- LMHA established Senior Maintenance Manager and Maintenance Manager positions to review LMHA systems to identify critical needs, review past planning and forecast capital needs; information gathered from staff as well as current HQS and REAC inspections informed LMHA's 2023 Annual Plan and the 2023 Five Year Action Plan;

- LMHA began a Physical Needs Assessment and Energy Audit in May 2023.

**Goal #3: Enhance the provision of services to residents, applicants, and the public**

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, Passages, Inc. Connecting Fathers and Families, and an LMHA Resident.

LMHA encourages new families to express interest in being on the list for Section 3 employment opportunities, which 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.
- The Resident Service Coordinator assisted by LMHA's Resident Services staff worked with Lorain County agencies and non-profits to connect residents and participants with Emergency Rental Assistance Funds
- The Resident Service Coordinator assisted by LMHA's Resident Services staff worked with Lorain County agencies, non-profits, State of Ohio Department of Aging, and other state agencies to provide COVID-19 vaccination opportunities to all its residents
- 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
- Executive and Resident Services staff engaged in dedicated resident outreach including meetings, door to door canvassing, regular on site outreach as well as conducting rolling Resident Council Training Programs. Staff was successful in reestablishing Resident Councils at high-rise properties and the creation of the first family site Resident Councils. All resident Councils and the RAB are updating by-laws and MOUS.

- LMHA's Green Thumb flower and garden program continues to inspire 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. LMHA staff and individuals participated in 2023 Beautification Day. 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 were provided by various speakers to discuss Medicare, Medicaid, and Fraud Awareness at dedicated senior engagement events.
- LMHA is a Certified Credit Counseling agency
- LMHA conducts Homebuyer's Education Classes which fulfill HUD Approved Pre-Purchase Housing Counseling
- Boys and Girls Club: On site at Westview Terrace provides childcare for children residing with the Housing Authority at Leavitt Homes and Westview Terrace.
- Boys and Girls Club: On-site at Southside Gardens provided childcare for 40 children, 1 of whom reside with the Housing Authority; services
- Domestic Violence Awareness task force in collaboration with the Genesis House
- Referrals were made to 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, 2022, there were 24 families residing at Wilkes Villa and 11 HCVP families served by/enrolled at Horizon.
- In partnership with Horizon Education Center and the Boys and Girls Club of Lorain County, and other Lorain County non-profit providers the USDA Summer Food Program provides children with breakfast and lunch at Wilkes Villa, Leavitt Homes and Westview Terrace.
- Offer Financial Assistance for Education to assist residents to improve work skills and achieve individual and educational goals
- Publishes a bi-monthly newsletter 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
- Residents at various LMHA properties are offered 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 the Tenant Based Rental Assistance (TBRA) program for HCVP participants to assist with security deposits & utilities
- Lorain County Homeless Task Force
- Lorain County Goodwill: Job Club
- Ohio Means Jobs: Employment Opportunities
- Catholic Charities: Resources
- 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
- 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 tenants at Riverview, Kennedy, International, and Harr Plazas with monthly Senior Food Boxes

**Goal #4: Increase the supply of accessible housing**

- Retrofit units with desired accessible features for residents who request accommodations
- LMHA reviewed 686 requests for reasonable accommodations in 2022

**Goal #5: Promote self-sufficiency, asset development, and homeownership**

LMHA's Housing Choice Voucher Home Ownership Program has 88 active participants and has assisted 205 participants to purchase homes since the program's inception in 2002. Twelve (12) participants became new homeowners in 2022. LMHA has a goal of seven (7) new Homeowners in 2023.

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 bringing 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 2022, the program had:

- 121 families participate in counseling and education activities
- 59 complete pre-purchase homebuyer / financial literacy education workshop
- 49 receive one-on-one counseling for pre-purchase/home buying
- 12 receive one-on-one counseling for home maintenance and financial management for homeowners
- 0 receive one-on-one counseling for resolving or preventing mortgage delinquency or default

Housing Counseling program one-on-one counseling outcomes for 2023.

- 60 Households that received one-on-one counseling that also received group education services.
- 61 Households that received information on fair housing, fair lending and/or accessibility rights.
- 62 Households for whom counselor developed a sustainable household budget through the provision of financial management and /or budget services
- 35 Households that improved their financial capacity (e.g. increased discretionary income, decreased debt load, increased savings, increased credit score) after receiving Housing Counseling Services.
- 6 Household that gained access to resources to help them improve their housing situation (e.g. down payment assistance, rental assistance, utility assistance, etc.) after receiving Housing Counseling Services.
- 3 Households that gained access to non-housing resources (e.g. social services programs, legal services, public benefits such as Social Security or Medicaid, etc.) after receiving Housing Counseling Services.
- 5 Households that received prepurchase / home buying counseling and purchased housing after receiving Housing Counseling Services.
- 7 Households that received non-delinquency post-purchase counseling that were able to improve home conditions or home affordability after receiving Housing Counseling Services.

**Goal #5: Promote self-sufficiency, asset development and homeownership**

Through effective implementation of Family Self Sufficiency and Home Ownership programs, utilization of resources in the Resident Services Department, and collaboration with other agencies throughout

Lorain County, LMHA aims to empower and equip families to improve their quality of life, achieve economic stability, and reduce their need for government assistance.

LMHA's **Housing Choice Voucher** FSS program statistics for January 1, 2022 thru December 31, 2022:

- 78 current HCV FSS participants
- 15 new participants added
- 2 graduated with final escrow disbursements totaling \$17,146.49.
- 50 have positive escrow accounts totaling \$145,919.77.
- 21 new accounts established this year
- 10 increased their escrow deposits due to higher earned income
- 61 are employed
- 36 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 4 continue to work on their General Education Diploma (GED) (2 earned in 2021)
- 14 are enrolled in college
- 15 have associate degrees (2 earned in 2022)
- 3 have bachelor's degree
- Highest Disbursement check total \$11,276.92

LMHA's **PH FSS** program statistics for January 1, 2022 thru December 31, 2022:

- 54 current HCV FSS participants
- 3 new participants added
- 6 graduated with final escrow disbursements totaling \$39,814.57
- 27 have positive escrow accounts totaling \$108,229.54
- 2 new accounts established this year
- 15 increased their escrow deposits due to higher earned income
- 30 are employed
- 10 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 1 continue to work on their General Education Diploma (GED)



- 7 are enrolled in college
- 6 have associate degrees
- 1 has a bachelor's degree
- Highest Disbursement check total \$17,890.43

**Goal #6: Promote and market LMHA's owned and managed affordable housing in Lorain County, not only Public Housing and Multifamily properties but also the HCVP Program**

- LMHA advertised through a variety of diverse daily and monthly publications and media, such as traditional newspapers, radio advertisements, ethnic publications, and coupon programs to ensure residents of Lorain County are aware of the availability of affordable housing without discrimination
- LMHA expanded its of social media outlets (Facebook, text message blasts, email blasts, message boards, website) to better communicate agency news and events to residents and the community
- LMHA printed and emailed newsletters for its residents and participants
- LMHA improved engagement with local government entities and community partners to improve access to all LMHA programs

**Goal #7: Enhance the safety of the living environment for public housing residents**

- Continue to provide protective services at various properties as funds are available – LMHA brought Security Services in house which provides greater flexibility in addressing issues as they arise
- Provide above baseline police protection services at public housing properties and multifamily properties as funds are available
- Engaged with the Lorain Police Department and the Elyria Police Department in planning for security camera capital projects at all LMHA sites – supply chain issues have affected the rollout of services, however, cameras are expected to be operational by the end of 2023
- Continue to encourage residents to report suspicious or criminal activity observed at their properties
- Residents and participants use multiple alternative methods of reporting criminal or suspicious activity, such as text messaging, emailing, voicemail, or online reporting capabilities
- Coordinated resident engagement at Wilkes Villa with the Elyria Police Department (EPD) under the Project Safe Neighborhood grant continues; EPD staff changes affected scheduling in 2022.

**Goal #8: Explore and Implement Green Initiatives**

- Continued review and implementation of lighting improvements throughout LMHA
- Reduced the amount of paper consumed through use of TenDocs digital files, DocuSign, Adobe sign and email of documents
- Made progress in implementing electronic applicant files

- Continuing purchase of only Energy Star appliances (refrigerators and air conditioners at several properties)
- Utilized low/no-VOC paints and sealants
- Upgrades to virtual connection to site community rooms to maximize resident engagement for all residents and participants

**Goal #9: Ensure Equal Opportunity and Affirmatively Further Fair Housing**

- Conducted annual Fair Housing Training and Reasonable Accommodation training for all employees, with some being tailored to specific personnel, such as maintenance staff, receptionists, management, inspectors, case workers, etc.

**Goal #10: Promote deconcentration**

- During orientations, promote benefits of living in areas of Lorain County outside of the areas of high poverty by highlighting housing opportunities, services, employment opportunities and amenities
- Increased affordable housing choices by assessing low poverty areas and increasing voucher payment standards
- Supported portability by allowing families the opportunity to move outside of areas of poverty
- Encouraged the use of [www.gosection8.com](http://www.gosection8.com) where families may seek housing via the internet
- LMHA Executive staff, HCV department, and Board of Commissioner held an in person HCV Landlord engagement event in September 2022; an event is planned for September 2023

# LMHA LARC MEETING

2023/2024 Annual Plan and 5 – year Action Plan Review

**Date:** 5/17/2023

**Time:** 10:00 am – 11:00 am

## IN ATTENDANCE

Harr / International Plaza

Ronald Brown  
Kelly Overly  
Queen Stone  
Paul Thayer

Lakeview Plaza

Wayne Boone  
David Christy  
John Russell

Southside Gardens

Lashaie Ellis  
Shakeena Martin  
Barbara Washington

HCVP Representatives

Bill Buckles  
Pamela Davila  
Sharon Washington

Wilkes Villa

Melanie Fields  
Zhane Wilson

Kennedy Plaza

Timothy Lang

Albright Terrace

Anita Crosby

LMHA Resident Services

Judy Carlin, CEO  
Jani Justice, RSS  
Deborah Weppelman, RSC

## PRESENTATION

LMHA Annual Plan and 5 Year Action Plan - Judith Carlin , LMHA CEO

## QUESTIONS FROM THE LORAIN AREA RESIDENT COUNCIL

Q - Will the HVAC updates be made to other building than just the COCC? – Shakeena Martin

A – No, the HVAC system at COCC no longer provides sufficient heating or cooling. It needs replaced.

Q – Parking is limited at Wilkes Villa; can it be increased? – Zhane Wilson

A –LMHA will review parking lots for needed improvements.

Q – You mentioned heat treatment rooms for bedbugs at the high-rises. Will this also be available for the family sites? – Shakeena Martin

A – No, it will be offered at the high-rises as they are dramatically more affected by the spread of bedbugs due to the nature of the building construction and how quickly bedbugs' travel.

Q - The old tables and chairs are stacked in the secondary community room at International Plaza. I feel they are a danger. Can they be removed? – Kelly Overly

A - We will get them removed.

Q - What is the purpose of the Resident Advisory Board (LARC)? – Sharon Washington

A - This meeting is to present the Annual Plan and 5-year Action Plan to the LARC and to answer any questions. At a typical LARC meeting, the agenda is set and the meeting is managed by the LARC. It is a chance to bring resident concerns, questions, and suggestions for improvement to Administration. These meetings are held quarterly.

Q – When is the next LARC meeting? – Pamela Davila

A – Information on the next LARC meeting will be mailed to everyone soon. It will be in-person at 1600 LMHA.

Q – Can we get copies of the Annual Plan and 5-year Action Plan interoffice mailed to us? – Kelly Overly

A – Yes, we will mail copies to everyone on the LARC.

Q- Can a family on HCVP move into a multifamily building? – Anita Crosby

A – No, an HCV cannot be used to move into our multifamily buildings, International and Harr Plaza.

Q – Can someone in Public Housing apply for the HCVP? – Pamela Davila

A – Yes, when the waiting list is open.

Q – What does LMHA do for all the homeless who do not get vouchers? – Sharon Washington.

A – The waitlist opens periodically. As people leave the HCVP, vouchers become available. When there is not a significant number of applicants on the HCVP waiting list, the list will be opened. LMHA continuously monitors the waiting list.

Q – Are there 3,600 vouchers? – Pamela Davila

A – No, it is just over 3,200.

Q – Can you describe the efficiency units changing into bigger units again? – Shakeena Martin

A – There is a need for more ADA accessible unit's agency-wide. Efficiency apartments are often rejected. LMHA is exploring the possibility of renovating efficiency apartments into ADA accessible 1- or 2-bedroom units.

Q – I, like others in my community, received a plan in the mail and lost it or threw it away. Was that how we suggest improvements at our locations?

A – Copies of the Annual Plan and the 5-year Action Plan will be mailed to everyone in attendance. LMHA continuously assesses property needs.

**Meeting Adjourned**