

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, 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: Lorain Metropolitan Housing Authority PHA Code: OH012 PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): 7/1/2024 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 1438 Number of Housing Choice Vouchers (HCVs) 3,163 Total Combined Units/Vouchers 4,601 PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. 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. 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. LMHA posts the Annual PHA plan, the Five-Year Plan, and the Capital Fund Program 5-Year Action Plan elements on its website at www.lmha.org. Plans are also available at the LMHA Main Office, 1600 Kansas Avenue, Lorain, OH 44052 and at all administrative and property management offices: <ul style="list-style-type: none"> o LMHA (formerly LMHA’s procurement office) 1604 Kansas Avenue, Lorain, OH 44052 o Leavitt Homes 2153 Lorain Drive, Lorain, OH 44052 o Kennedy Plaza 1730 Broadway, Lorain, OH 44052 o Lakeview Plaza 310 W. 7th Street, Lorain, OH 44052 o Southside Gardens 3010 Vine Ave., Lorain, OH 44055 o Albright Terrace 129 Milan Ave., Amherst, OH 44001 o John Frederick Oberlin Homes 138 South Main St., Oberlin, OH 44074 o Wilkes Villa 104 Loudon Court, Elyria, OH 44035 o Riverview Plaza 310 East Ave., Elyria, OH 44035 o Harr Plaza 15 Chestnut Street, Elyria, OH 44035 o International Plaza 1825 Homewood Drive, Lorain, OH 44055 LMHA provides the Plans to its resident councils. </p> <p> To obtain additional information on the policies contained in the Annual Plan, visit http://www.lmha.org/about-lmha/ and select either “Annual Reports and Audits” or “LMHA Policies”. For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750. </p>

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

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

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.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

- b.1 Attachment A Statement of Housing Needs and Strategy for Addressing Housing Needs**
- b.2 Attachment B - Financial Resources**
- b.3 Housing Choice Voucher Administrative Plan - HOTMA changes as required by regulation**
Public Housing (PH) Rent Policies – HOTMA changes as required by regulation
- b.4 Attachment C – Operation and Management**
- b.5 Attachment D - Safety and Crime Prevention**
- b.6 Attachment E - Substantial Deviation Significant Amendment/Modification**

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

See Attachment F Deconcentration Policy of the Lorain Metropolitan Housing Authority

<p>B.2</p>	<p>New Activities.</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"/> Designated Housing for Elderly and/or Disabled Families. Do we want to designate any properties Elderly/Disabled</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 Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</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>See Attachment G New Activities.</p>
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>See Attachment H Progress Report</p>
<p>B.4</p>	<p>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.</p> <p>Capital Fund 5-yr Action Plan 2023-2027, approved by HUD on 4/12/24.</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N</p> <p><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>See Attachment I</p>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>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>		
C.4	<p>Challenged Elements. 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>(a) 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>		
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>		
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>		
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</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> <p>See Attachment G</p> <table border="1" data-bbox="180 1440 1453 1892"> <tr> <td data-bbox="180 1440 1453 1478"> <p>Fair Housing Goal:</p> </td> </tr> <tr> <td data-bbox="180 1478 1453 1892"> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHA is not required to submit.</p> <p>LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> • Promote lower rates of crime through engagement with local police departments’ efforts on community policing • Support and promote affordable and accessible housing • Annual training for staff on Fair Housing and Reasonable Accommodation Law • Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action. </td> </tr> </table>	<p>Fair Housing Goal:</p>	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHA is not required to submit.</p> <p>LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> • Promote lower rates of crime through engagement with local police departments’ efforts on community policing • Support and promote affordable and accessible housing • Annual training for staff on Fair Housing and Reasonable Accommodation Law • Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action.
<p>Fair Housing Goal:</p>			
<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHA is not required to submit.</p> <p>LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> • Promote lower rates of crime through engagement with local police departments’ efforts on community policing • Support and promote affordable and accessible housing • Annual training for staff on Fair Housing and Reasonable Accommodation Law • Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action. 			

	<p>Fair Housing Goal: <u>Describe fair housing strategies and actions to achieve the goal</u></p>
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Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

- A. PHA Information.** All PHAs must complete this section. (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.** All PHAs must complete this section.
- 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.” (24 CFR §903.7)
- Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA 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. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

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

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

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

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

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

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide 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 subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

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

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

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. 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 in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

HOPE VI or Choice Neighborhoods. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

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 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/hopec6/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. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing 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 Rental 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.](#)

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

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

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03.](#) (24 CFR §903.7(e))

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

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

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

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

B.3 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.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” ([24 CFR §903.9](#))

D. Affirmatively Furthering Fair Housing (AFFH).

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 in part 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.

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

Public reporting burden for this information collection is estimated to average 7.52 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

At the end of calendar year 2023, nearly 85% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 88% of public housing residents, 91% of multifamily residents, and 83% of participants in HCVP are ELI. For comparison, 2022 data shows that approximately 12.9% of families in Lorain County are ELI. Approximately 23% of the public housing households (312) have zero annual income.

Approximately 26% 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 properties 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 178 are elderly; 90 are persons with a disability. In LMHA's public housing, 565/41% of the heads of households are persons with a disability, and 494/36% of the heads of household are elderly. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County. Source for Lorain County statistics:

<https://data.census.gov/table/ACSST1Y2022.S1701?q=Lorain%20County,%20Ohio&t=Income%20and%20Poverty:Poverty&tid=ACSST1Y2019.S1701>.

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 435 requests for Reasonable Accommodations annually for all housing programs in calendar year 2023.

LMHA administers 175 vouchers for persons who are Non-Elderly Disabled (NED), 117 Veterans Affairs Supportive Housing (VASH) vouchers and are housing 2 persons via the Foster Youth to Independence (FYI) initiative. LMHA had 4 referrals in 2023. Two were withdrawn as other housing was secured. Two were issued vouchers and are leasing up.

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 3 times. LMHA is considering a modernization project to convert efficiencies to 1-bedroom units by combining 3 adjacent efficiencies into 1-bedroom or two-bedroom units. Lakeview Plaza, 310 W 7th Street, Lorain, OH 44052, in which 150 of the 209 units are efficiencies is ideal for this conversion. The project was added to the 2019 5-Year Action Plan and plans have been made to proceed with the project.

Homelessness in Lorain County

LMHA is considering adding a homeless preference to its housing programs. Information provided from Lorain County Homeless Shelters estimates that 160 persons are unsheltered on any given night. COHHIO's PIT count unsheltered figure was 27. Should LMHA determine that a preference should be added that change would be a Substantial Deviation/Significant Amendment and all requirements will be followed.

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 current 2024 Action Plan, currently available only in draft form, is available at:

https://www.cityofelyria.org/wp-content/uploads/2023/10/DRAFT_2024_ANNUAL_ACTION_PLAN.pdf

LMHA is reviewing its portfolio and exploring collaborations with the City of Elyria to develop Wilkes Villa (Elyria).

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:

Housing Priority: There is a need to maintain, expand and improve affordable housing.

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. LMHA may award up to the 438 vouchers approved by HUD in February 2019. Vouchers will be awarded throughout Lorain County either through a competitive RFP process or LIHTC or other competitive processes for supportive services.

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. The current 2023-2024 Action Plan, currently available only in draft form is available at:

<https://www.cityoflorain.org/DocumentCenter/View/4778/Annual-Action-Plan---2023-DRAFT>

All City of Lorain Annual Action Plans and the Consolidated Plan are available at:

<https://www.cityoflorain.org/397/Permits-Publications>

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 was awarded a Choice Neighborhood Planning Grant for the Southside Gateway Community in South Lorain in December 2022. The community includes Southside Gardens. The Housing Plan is under development. The plan will provide for 330 units of new construction; 110 replacement units for residents, 110 affordable units, and 110 market rate units. These units will include fully mobility accessible units and all units will be constructed utilizing principles of universal design.

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

PUBLIC HOUSING (PH) - Active on Waiting List As of 12/31/2023	# of Families	% of Total Families
Total	107	100
Extremely low income (<=30% AMI)	95	89
Very low income (>30% but <=50%AMI)	10	9
Low Income (>50% but <80% AMI)	2	2
Families with children ⁴	75	70
Elderly families	2	2
Families with Disabilities	18	17
Female HOH	56	52
Hispanic	23	21
White	49	46
Black/African American	24	22
American Indian/Alaska Native	1	1
Asian	0	0
Native Hawaiian/other Pacific Islander	0	0
Multi-racial	1	1

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

PUBLIC HOUSING (PH) APPLICANTS not yet processed for eligibility As of 12/31/2023	# of Families	% of Total Families
Total	2656	100
Female HOH	1582	60
Hispanic	659	25
White	1870	70
Black/African American	671	25
American Indian/Alaska Native	12	0.4
Asian	8	0.1
Native Hawaiian/other Pacific Islander	14	1

Multi-racial	42	2
Not reported	39	1

Housing Choice Voucher Program Waiting List As of 12/31/2023	# of Families	% of Families
Total	690	100
Extremely low income	578	84
Very Low Income	65	9
Low Income	34	5
Families with children	31	4
Elderly families	42	6
Families with disabilities	77	11
Female HOH	567	82
Hispanic	145	21
White	252	37
Black/African American	269	39
American Indian/Alaska Native	8	1
Asian	0	0
Native Hawaiian/other Pacific Islander	4	1
Multi-racial	21	3
Not reported	136	20

MULTIFAMILY HOUSING APPLICANTS (Harr and International Plazas) As of 12/31/2023	# of Families	% of Families
Total	86	100
Extremely low income	72	84
Very Low Income	14	16
Low Income	0	0
Families with children	0	0
Elderly families	31	36
Families with disabilities	56	65
Female HOH	52	60
Hispanic	20	23
White	57	66
Black/African American	21	24
American Indian/Alaska Native	0	0
Asian	0	0
Native Hawaiian/other Pacific Islander	2	2
Multi-racial	0	0
Not reported	1	1

MULTIFAMILY HOUSING APPLICANTS not yet processed for eligibility As of 12/31/2023	# of Families	% of Total Families
Total	512	100
Female HOH	284	55
Hispanic	92	18
White	167	33
Black/African American	95	19
American Indian/Alaska Native	2	0.3
Asian	0	0
Native Hawaiian/other Pacific Islander	0	0
Multi-racial	14	3
Not reported	4	1

HCVP Participant Statistics

Housing Choice Voucher Program Active Participants As of 12/31/2023		
Total	2862	100
Disabled HOH	1188	42

Elderly HOH	510	18
Hispanic	848	30
Non-Hispanic	2014	70
Female HOH	2379	83
Male HOH	483	17
White	1599	56
Black/African American	1177	41
American Indian/Alaska Native	16	1
Native Hawaiian/Other Pacific Islander	24	1
Asian	1	0
Multi-Racial	42	1
Extremely low income (ELI)	2369	83
Very low income (VLI)	426	15
Low Income (LI)	58	2
High Income	9	0.3
Average Household Income	14,250.90	

Attachment B

Financial Resources

Lorain Metropolitan Housing Authority

Financial Resources - Expended on eligible purposes.		
1	Federal Grants - Current	
	Public Housing Operating Fund	\$8,224,780.00
	Public Housing Capital Fund	\$4,804,289.00
	HOPE VI Revitalization	\$0.00
	HOPE VI Demolition	\$0.00
	Annual Contributions for Section 8 Tenant Based Assistance	\$24,260,820.00
	Resident Opportunity and Self-Sufficiency Grants	\$137,000.00
	Community Development Block Grant	\$0.00
	HOME	\$0.00
	Other Federal Grants	\$0.00
	Choice Grant	\$500,000.00
	Choice Grant Leverages	\$105,000.00
	Nord Family Grant	\$100,000.00
2	Prior Year Federal Grants(unobligated funds only)	\$8,403,489.00
3	Public Housing Dwelling Rental Income	<u>\$2,783,378.00</u>
		\$49,318,756.00

Attachment C

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(e))

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 (HCVP).

LMHA is governed by a Board of Commissioners which contracts with three employees to lead the Housing Authority: Chief Executive Office, Chief Operating Officer, and Chief Financial Officer. The Authority is comprised of various departments to administer its programs: executive management, accounting, contract administration/procurement, Human Resources, admissions, work orders, resident services, 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/.

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 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
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
Smoke Detector Policy
Smoke Free Policy
Social Media Policy
Take Possession Policy
Transfer Policy
Unreported Income Repayment Policy
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 pests 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. When possible, this extermination service will occur the same day as the inspection.

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 vermin 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.

To mitigate the occurrence of heavy infestations, LMHA's extermination contractors conduct quarterly inspections of all LMHA-owned/managed residential units. During these quarterly inspections, monitors are placed in high traffic areas and checked at the next quarterly inspection.

This year, LMHA plans to install a Bed Bug Heat Treatment Room at Lakeview Plaza to provide additional service so that tenants' possessions can be treated as necessary.

Attachment D

Safety and Crime Prevention

LMHA continually reviews its Safety and Crime Prevention procedures. LMHA's Security Director position is now a Safety and Service Director.

LMHA camera monitoring upgrades are in process 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.

LMHA's Department of Safety and Security continues to strive to make the residents of LMHA safe and secure in their dwellings. With nine (9) in-house-Security Officers, continued training and direction is at the forefront of our goals, in order to provide a safe environment. Expanding the duties of our Security to include doing rounds and taking a more proactive approach, has paved the way for LMHA to create the position of Senior Security Officer. This new position will be instrumental in the day-to-day working activities of Security and also with any new tasks that will arise as soon as cameras are functional throughout our developments.

Strong working partnerships with our local Police Departments have proved invaluable in our quest to provide safety and security. Providing training and the sharing of information relating to criminal activities on our property is instrumental in our goals.

Statistics submitted by Elyria Police shows a decrease in cases generated on LMHA Property. Total for 2023 was 158, compared to 174 in 2022. The most noted decrease was reduced Domestic Violence incidents at Wilkes Villa from nine (9) compared to sixteen (16) in 2022.

Statistics submitted by Lorain Police shows total cases on LMHA Property, along with a total for calls for service, or incidents that police responded to on LMHA Property. Total cases for 2023 were 316, a decrease from 421 in 2022. The statistics for actual calls for service shows that LPD responded to Lakeview Plaza more than any other LMHA High-rise while the Leavitt Homes has the highest police response compared to Westview Terrace and South Side Gardens.

Safety and Crime Prevention (VAWA)

LMHA has adopted an Emergency Violence Against Women Act (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>.

Further, LMHA Resident Service Coordinators and FSS Case Managers facilitate direct connection to domestic abuse resources and shelter for residents who express need for assistance. Each LMHA site community restrooms include the domestic abuse hotline posters that include contact information for the local safe harbor location. Each management office is equipped with informational pamphlets containing domestic abuse resources. Applicants of public housing and HCVP, and residents of public housing and participants of HCVP are provided a copy of Forms HUD-5380 and HUD-5382 at time of denial of assistance, time of admission, time of notification of lease termination, and time of notification of termination of assistance.

HUD-5380: Notice of Occupancy Rights under the Violence Against Women Act at each annual recertification, with any notice of lease termination, and with any notice of a grievance hearing. Additionally, Domestic Abuse Awareness projects are displayed in collaboration with the Genesis House Lorain County Safe Harbor in each Public Housing site and LMHA main office annually during Domestic Abuse Awareness month.

Attachment E

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

FY 2024 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, mixed-finance proposal, RAD Conversion or Capital Fund Financing

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.

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

Attachment F – 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. LMHA will determine the average income of all families in all covered developments on an annual basis.
2. LMHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.
3. 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. LMHA with covered developments having average incomes outside the EIR will then determine whether these developments are consistent with its local goals and annual plan.
5. For developments outside the EIR 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
\$10,959.19	\$9,315.32	\$12,603.07	1384

Attachment G – Deconcentration Policy and Analysis

Average Income in Each Covered Development					
Development Name	Number of Units	Average Income	% of Average Income of All Covered Developments	Below 85%	Above 115%
Albright Terrace	50	\$10,109.64	92%	No	No
John Frederick Oberlin	53	\$8,792.37	80%	Yes	No
Kennedy Plaza	177	\$9,149.27	83%	Yes	No
Lakeview Plaza	209	\$9,847.66	90%	No	No
Leavitt Homes	198	\$8,390.15	77%	Yes	No
Oberlin Homes	51	\$10,831.41	99%	No	No
Riverview Plaza	180	\$9,855.76	90%	No	No
Scattered Sites	80	\$10,959.19	100%	No	No
Southside Gardens	111	\$10,595.32	97%	No	No
Westgate	12	\$10,106.35	92%	No	No
Westview	143	\$8,417.65	77%	Yes	No
Wilkes Villa	174	\$8,466.50	77%	Yes	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.

Attachment G

New Activities

Hope VI or Choice Neighborhoods

Choice Neighborhoods Transformation Grant: LMHA intends to apply for a Choice Neighborhood Implementation Grant for the Southside Gateway Community including Southside Gardens when HUD issues the Notice of Funding Opportunity in 2025.

Mixed Finance Modernization or Development

LMHA is planning to pursue a portfolio wide CHAP to reposition its public housing stock through the RAD program. LMHA may utilize a variety of different options as part of the plan which could include RAD Section 18 blends or straight RAD conversions which may include project-based vouchers. Additionally, LMHA plans to utilize the 4% tax credit program through the Ohio Housing Finance Agency (OHFA) to accomplish this plan along with Capital Funds or LMHA Funds. LMHA intends to submit an application for 4% Tax Credits the 4th quarter 2024 or 1st quarter 2025.

LMHA will prepare and publish a significant amendment or update to its Annual/5-Year Plan at the appropriate time to comply with the requirements in 2019-23, REV-4.

LMHA also plans to develop new public/affordable housing units. LMHA is exploring the option of developing these units with the Faircloth to RAD program, Low-Income Housing Tax Credits, and other funding/financing resources.

Demolition and/or Disposition

LMHA plans to dispose of the Central Administrative Office property at 1600 Kansas Avenue, Lorain, OH 44052 via sale, pending the acquisition of a new property for the Central Office.

LMHA also plans to dispose of all scattered site units, listed below, through sale at fair market value.

List of Properties: Attached hereto as Ex. 1

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. LMHA may award up to the 438 vouchers approved by HUD in February 2019. Vouchers will be awarded throughout Lorain County either through a competitive RFP process or LIHTC or other competitive processes.

Units with Approved Vacancies for Modernization:

LMHA is planning to convert efficiency units at Lakeview Terrace to one or two bedroom ADA Accessible units to meet the needs of LMHA's requested and approved transfer list. LMHA is exploring conversion of efficiency units at Kennedy Plaza to one or two bedroom ADA Accessible units to meet the needs of LMHA's requested and approved transfer list.

LMHA will submit a request for approval by HUD for modernization vacancies as applicable for this purpose and for units requiring extensive renovation.

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

LMHA is planning to apply for other capital grant programs as available.

Other New Activities

LMHA plans to acquire a property located at 457 Broadway, Lorain, OH for Central Office operations.

Ex. 1

1100 Highland Pk., Lorain 44052	3719 Oxford Dr., Lorain 44053
1228 W. 8th St., Lorain 44052	3813 Oxford Dr., Lorain 44053
4302 Princess Anne Dr., Lor 44052	3923 Oxford Dr., Lorain 44053
2733 W. 39th St., Lorain 44053	3942 Oberlin Ave., Lorain 44053
1804 Lexington Ave., Lorain 44052	1503 Colorado Ave., Lorain 44052
1814 Lexington Ave., Lorain 44052	1515 Colorado Ave., Lorain 44052
1425 Pennsylvania Ave., Lorain 44052	1527 Colorado Ave., Lorain 44052
204 W. 17th St., Lorain 44052	1535 Colorado Ave., Lorain 44052
1405 W. 19th St., Lorain 44052	142 Brace Avenue, Elyria
318 W. 28th St., Lorain 44052	177 Brace Avenue, Elyria
443 Bell Avenue, Elyria	181 Brace Avenue, Elyria
230 Jackson Street, Elyria	930 Middle Avenue, Elyria
165 Erie Avenue, Elyria	152 Taft Street, Elyria
349 West Tenth St., Elyria	156 Taft Street, Elyria
138 Brace Avenue, Elyria	300 Parmely Avenue, Elyria
563 West Third St., Elyria	308 Parmely Avenue, Elyria
501 East Avenue, Elyria	304 Parmely Avenue, Elyria
425 14th Street, Elyria	748 West 16th Street, Elyria
162 Warden Ave., Elyria	163 Brunswick Drive, Elyria
143 Brunswick Drive, Elyria	165 Brunswick Drive, Elyria
145 Brunswick Drive, Elyria	107 Academy Court, Elyria
149 Brunswick Drive, Elyria	109 Academy Court, Elyria
151 Brunswick Drive, Elyria	125 Academy Court, Elyria
155 Brunswick Drive, Elyria	127 Academy Court, Elyria
157 Brunswick Drive, Elyria	4708 Clifton, Lorain
4600 Riverside Drive, Lorain	4710 Clifton, Lorain
4603 Riverside Drive, Lorain	4965 Clifton, Lorain
4604 Riverside Drive, Lorain	4967 Clifton, Lorain
4607 Riverside Drive, Lorain	4969 Clifton, Lorain
610 East 32nd Street, Lorain	4971 Clifton, Lorain
612 East 32nd Street, Lorain	5031 Clifton, Lorain
4921 Vincent Avenue, Lorain	5033 Clifton, Lorain
4924 Vincent Avenue, Lorain	5035 Clifton, Lorain
4925 Vincent Avenue, Lorain	5037 Clifton, Lorain
4928 Vincent Avenue, Lorain	5039 Clifton, Lorain
4932 Vincent Avenue, Lorain	3733 Dallas, Lorain
4936 Vincent Avenue, Lorain	3737 Dallas, Lorain
4940 Vincent Avenue, Lorain	3741 Dallas, Lorain
618 East 39th Street, Lorain	5341 Fleming, Lorain
5096 Libery Avenue, Lorain	5126 Liberty Avenue, Lorain

Attachment H

Goal Progress

Goal #1: Expand the supply of affordable housing

- LMHA's total voucher count reached 3,163
- LMHA now has a total of 117 VASH Vouchers
- LMHA has 175 vouchers for persons who are non-elderly disabled (NED)
- 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 – all units are online
- Provided 17 project-based vouchers to Family and Community Services – units are expected to be online by in 2024
- 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 – final approval was granted by the Lorain City Council on January 16, 2024
- Provided 8 project-based vouchers to South Lorain Family Apartments – this project is not yet funded.

Goal #2: Improve the quality of affordable housing

- LMHA obligated \$ 465,785 in capital improvements for public housing properties;
- LMHA's Senior Maintenance Manager and Maintenance Manager positions 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 2024 Annual Plan;
- LMHA completed its Physical Needs Assessment and Energy Audit in July 2023.

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

The LMHA Resident Service Coordinators work one-on-one with residents providing needs assessments and facilitating connections with organizations who have the resources to meet the resident's needs. Resident Service Coordinators are trained to reduce resident barriers and offer resources that help with housing retention and improve the resident's quality of life. From our youth to our senior citizens, the Resident Service Coordinator is equipped with the knowledge needed to resolve challenges the resident is experiencing. The Resident Services Department plan events and functions designed to bring communities together while meeting outside agencies who offer resources useful to the residents. Residents can also participate in programming and educational classes that promote well-being, healthy eating, financial soundness, and other topics that support the resident's overall quality of life.

Resident Councils give all residents the opportunity for their voice to be heard and to contribute to Resident Council initiatives within their property. They may also run for office or serve on committees whose goal is to listen to the residents' ideas and suggestions and work towards creating environments within their community that enhance the living experience for all.

LMHA offers the Family Self-Sufficiency Program to both the Public Housing residents and HCV participants. LMHA is also a HUD certified Housing Counseling agency. Public Housing residents and HCV participants have the opportunity to attend financial literacy and prepurchase education classes that prepare them for the purchase of their own home. Those who are not ready for homeownership can work with our HUD certified housing counselor on topics like budgeting, credit, debt reduction, savings plans, and other areas that move them closer to mortgage readiness. HCV participants who meet the HCV Homeownership program eligibility criteria, also have the opportunity to purchase their own home with their HCV assistance on the HCV Homeownership program.

Further, LMHA utilizes multiple partnerships with agencies who offer services designed to increase self-sufficiency and decrease need for public assistance. Many partners that offer assistance in post-secondary education, job search assistance, transportation, childcare, fatherhood support and other topics crucial to self-sufficiency provide programming on-site at an LMHA resource center or will meet with the resident individually if requested. Our network of providers allows us to offer a consistent stream of opportunities available to our residents. We continue to focus on increasing our partnerships and programming offered to our Public Housing residents year after year.

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 Coordinators 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
- 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
- The Resident Services Coordinator assisted by Executive and Resident Services staff review Resident Council organizational documents and procedures and determined that additional review and training for resident engagement and participation is needed; a Resident Council Training Program was implemented in 2023 with the goal of fully trained and compliant resident councils and RAB operating under updated By-laws and MOUs
- 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.
- 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.
- 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 Group Housing Counseling Homebuyer's Education which fulfills the HCV Homeownership program requirements
- Boys and Girls Club: On site at Westview Terrace provides childcare for children residing with the Housing Authority at Leavitt Homes and Westview Terrace.
- LMHA participates in the Domestic Violence Awareness Task Force in collaboration with the Genesis House Lorain County Safe Harbour
- 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 31 children 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 quarterly 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
- 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 and utilities distributing \$13,500 to assist 26 families
- LMHA participates in the Lorain County Homeless Task Force
- Coordinates employment assistance with Lorain County Goodwill: Job Club; Ohio Means Jobs: 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
- LMHA assisted Wilkes Villa Resident Council distribute backpacks stuffed with school supplies.
- LMHA partnered with Mini-Pioneers football to provide a youth football camp with plans to expand youth programming and opportunities in 2024.
- LMHA hosts an annual Senior Resource Fair aimed at connecting our senior population with multiple life-enriching resources.

Goal #4: Increase the supply of accessible housing

- Retrofit units with desired accessible features for residents who request accommodations
- LMHA reviewed 435 requests for reasonable accommodations in 2023

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 Public Housing FSS program statistics for January 1, 2023, thru December 31, 2023:

- 50 current PH FSS participants
- 9 new participants added
- 2 graduated with final escrow disbursements totaling \$6,329.53
- 41 have positive escrow accounts totaling \$152,519.52
- 8 new escrow accounts established this year
- 11 increased their escrow deposits due to higher earned income
- 34 are employed
- 17 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 2 continue to work on General Education Diploma (GED)
- 16 are enrolled in college or technical school
- 4 have earned a degree or certification
- Highest Disbursement check total \$4,284.95

LMHA's Housing Choice Voucher FSS program statistics for January 1, 2023, thru December 31, 2023:

- 68 current HCV FSS participants
- 24 new participants added
- 10 graduated with final escrow disbursements totaling \$75,363.65
- 50 have positive escrow accounts totaling \$176,919.23
- 5 new accounts established this year
- 9 increased their escrow deposits due to higher earned income
- 37 are employed
- 38 have been employed more than a year
- 1 participant receives Temporary Assistance to Needy Families (TANF) Cash Assistance

- 1 continues to work on their General Education Diploma (GED) (2 in 2023)
- 12 are enrolled in college
- 11 have associate degrees (2 earned in 2023)
- 3 have a bachelor's degree
- Highest Disbursement check total \$20,455.68

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 92 active participants and has assisted 214 participants to purchase homes since the program's inception in 2002. Ten (10) participants became new homeowners in 2023. LMHA has a goal of seven (7) new homeowners in 2024.

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 2023, the program had:

- 92 families participate in counseling and education activities
- 49 complete pre-purchase homebuyer / financial literacy education workshop
- 37 receive one-on-one counseling for pre-purchase/home buying
- 5 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

Outcomes for Housing Counseling

- 43 Households that received one-on-one counseling that also received group education services.
- 43 Households that received information on fair housing, fair lending and/or accessibility rights.
- 43 Households for whom counselor developed a sustainable household budget through the provision of financial management and /or budget services
- 25 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 Households 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 received pre-purchase /home buying counseling and purchased housing after receiving Housing Counseling Service

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 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's in-house Security Services provide 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; roll out has been affected by supply chain issues and electric utility required agreements, however, cameras are expected to be operational by the end of 2024
- 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

Goal #8: Explore and Implement Green Initiatives

- Continued review and implementation of lighting improvements throughout LMHA
- Reduced the amount of paper consumed through transition to Yardi Enterprise Software System, DocuSign, Adobe sign and email of documents
- Applicants now can apply electronically for Public Housing and Section 8 through the Applicant Portal
- Continuing purchase of only Energy Star appliances (refrigerators and air conditioners at several properties)
- Utilized low/no-VOC paints and sealants
- Maintain and facilitate 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 where families may seek housing via the internet
- LMHA Executive staff and HCV department held an in person HCV Landlord engagement event in January 2023

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Kevin Brubaker, the Mayor of the City of Elyria
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years N/A and/or Annual PHA Plan for fiscal
year 2024-2025 of the Lorain Metropolitan Housing Authority is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Elyria

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

Please see attached.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official: <u>Kevin A. Brubaker</u>	Title: <u>Mayor</u>
Signature: <u>KA Br</u>	Date: <u>2-15-24</u>

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. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

2024 LMHA Certification of Consistency with the Consolidated Plan Summary

After review of LMHA's 2024 Annual PHA Plan it has been determined that the plan is consistent with the City of Elyria's 2020-2024 Consolidated Plan and Analysis of Impediments to Fair Housing Choice.

The City of Elyria identifies Maintain, improve and expand affordable housing, Provide needed public services, Homelessness and increase economic opportunities as priorities in the Five Year Plan. Further, goals and strategies have been identified by the City to support these priorities.

Goal:

Maintain, improve and expand affordable housing: LMHA continues to provide vouchers including VASH, non-elderly disabled, Emergency Housing Vouchers. LMHA partners with Lorain County and the City of Elyria to provide Tenant Based Rental Assistance to assist with security deposits, first months rent and/or utility deposits. LMHA provides project-based vouchers for the development of Bridge Pointe Commons supportive housing development. LMHA provides technological capacities in residential buildings thru the provision of computer labs and internet access for residents in seven LMHA properties.

LMHA is proposing to rehabilitate units as needed, including, but not limited to the following: bath/plumbing, appliances, furnace replacement, electrical, light replacement, doors, window and radon testing.

LMHA obligated \$11,289,058 in capital improvements for public housing properties. LMHA completed a Physical Needs Assessment and Energy Audit in July 2023. They continue to purchase only Energy Star appliances and review and implement lighting improvements throughout LMHA.

LMHA continues to provide protective services at various properties. At times they provide above baseline police protections services and engage with the Elyria Police Department.

Homeless Needs: There is a need for a year-round homeless shelter in the City of Elyria. There is also a need for a drop-in center for the homeless to access bathrooms, showers, fresh water, and HVAC systems during the day when the shelters are closed. There are currently limited facilities for homeless families with children in the City of Elyria. The homeless population is growing and there is a lack of Federal funds to develop additional beds and permanent housing for the homeless. LMHA provides affordable housing to those at risk for becoming homeless.

Non-Homeless Special Needs: Includes the following: Elderly persons, frail elderly, Persons with mental, physical and/or developmental disabilities, Persons with alcohol or other drug addictions, Persons with HIV/AIDS and their families, Victims of domestic violence, dating violence, sexual assault and stalking. LMHA retrofits units with desired accessible features for residents who request accommodations. They reviewed 435 requests for reasonable

accommodations in 2023. LMHA's Project based Voucher Program is supporting the development of additional supportive housing. LMHA will consider collaboration with providers of on-site mental health services/addiction services for residents.

Fair Housing Education and Outreach was identified as Impediment 1 to Affordable Housing.

LMHA 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.

Goals:

Provide needed public services and economic opportunities: LMHA provides enhanced direct one-on-one services utilizing the service coordination grant to TANF recipients pursuing higher education, grant and loan information, career counseling and GED classes. LMHA partners with Ohio Means Jobs Lorain County to provide a one-stop location for self-help seminars, training programs, and information about employment opportunities. Other services include the following: Family Self Sufficiency programming, Green Thumb flower and garden program, Resident Assistance Watch programs, Homebuyer Education classes, Domestic Violence Awareness task force, shuttle services, Horizon daycare facility to name a few.

Computer labs are available at several LMHA public housing high rises giving residents computer and internet access to look for employment, complete online applications. Computer kiosks are also available in the LMHA main office lobby.

Presentations were provided by various speakers to discuss Medicare, Medicaid, and Fraud Awareness at dedicated senior engagement events.

LMHA encourages new families to express interest in being on the list for Section 3 employment opportunities, which are provided to contracted service providers.

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.

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning July 1, 2024, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);



- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Lorain Metropolitan Housing Authority
PHA Name

OH012
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2024
 5-Year PHA Plan for Fiscal Years 20__ - 20__

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director		Name Board Chairman	
Judith A. Carlin		Linda Davis	
Signature	Date <u>3-28-24</u>	Signature	Date <u>3-28-24</u>

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. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.