

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

Definitions.

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

A.	PHA Information.
A.1	<p> PHA Name: <u>Lorain Metropolitan Housing Authority</u> PHA Code: <u>OH012</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1435</u> Number of Housing Choice Vouchers (HCVs) <u>3091</u> Total Combined Units/Vouchers <u>4526</u> 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 in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> LMHA posts the Annual PHA plan, the Five Year Plan, and the 5-Year Action Plan elements on its website at www.lmha.org. Plans are also available at the LMHA Main Office, 1600 Kansas Avenue, Lorain, OH 44052 and at all administrative and property management offices: <ul style="list-style-type: none"> o LMHA Procurement Office 1604 Kansas Avenue, Lorain o Leavitt Homes 2153 Lorain Drive, Lorain o Kennedy Plaza 1730 Broadway, Lorain o Lakeview Plaza 310 W. 7th Street, Lorain o Southside Gardens 3010 Vine Ave., Lorain o Albright Terrace 129 Milan Ave., Amherst o John Frederick Oberlin Homes 138 South Main St., Oberlin o Wilkes Villa 104 Loudon Court, Elyria o Riverview Plaza 310 East Ave., Elyria o Harr Plaza 15 Chestnut Street, Elyria o International Plaza 1825 Homewood Drive, Lorain </p> <p> LMHA provides the Plans to each of its resident councils. </p> <p> To obtain additional information on the policies contained in the Annual Plan, visit http://www.lmha.org/about-lmha/ and select either "Annual Reports and Audits" or "LMHA Policies". For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750. </p>

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

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

B. Annual Plan Elements

B.1 Revision of 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):

Each of the PHA Plan Elements listed in B.1(a) is described in the following pages. Changes are printed in *bold italics* unless otherwise indicated.

B.1b

Statement of Housing Needs and Strategy for Addressing Housing Needs

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

In 2016, 93% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 87% of public housing residents and 77% of participants in HCVP are ELI. For comparison, approximately 15% of families in Lorain County are ELI¹. Nineteen percent of the public housing households have zero income. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County.

Approximately 29% of LMHA applicants for PH and HCVP are elderly families or families with disabilities. In public housing, if an accessible unit is vacant, that unit will be offered to the first family that is in need of the features of the unit, even if the family is not at the top of the waiting list. If an applicant or current family does not need the accessibility, LMHA contacts agencies who serve persons with disabilities to advise them of the availability of such units.

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

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

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

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

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

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

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

B.1b

The City of Elyria's Consolidated Plan for 2015-2019 is available online at <http://www.cityofelyria.org/wp-content/uploads/2016/03/2015-2019-Consolidated-Plan.pdf>. (Refer specifically to pages 25-48 for housing need analyses.)

The Plan draft discusses the primary housing problems: Lacks complete kitchen facilities; lacks complete plumbing facilities; more than one person per room; cost burden greater than 30%. On page 31, the City discusses the most common housing problems:

The largest housing problem in the City of Elyria is housing affordability. According to the 2007-2011 ACS data, 39.47% of all renter households are cost overburdened by 30% or more, and 16.23% of all owner households are cost overburdened by 30% or more. In addition, 22.18% of all renter households are cost overburdened by 50% or more, and 7.61% of all owner households are cost overburdened by 50% or more.

In consultations, interviews and surveys, the lack of affordable accessible housing for the disabled is the largest unmet housing need and problem. Most of the affordable housing units are located in the central and southern portions of the City. It contains the oldest housing stock which is multi-stories in height and not easily modified for the needs of the disabled.

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

The elderly and disabled populations are the most affected by the high cost of housing in the City of Elyria. The elderly and disabled are on fixed or limited incomes. The lack of affordable housing that is decent, safe, and sound, forces the elderly and disabled into housing that is below code standards.

The provision of affordable housing is LMHA's mission and specialty. Creation of quality, affordable accessible housing by LMHA has increased in the past 10 years. LMHA's long range plans for redevelopment include almost all units being visitable (i.e., constructed with universal design principles) and creation of additional accessible housing. LMHA's public housing properties are general population and not specifically designated for the elderly or disabled. Yet, universally designed properties are intended to meet the needs of the general population, the elderly, and persons with disabilities. On LMHA's waiting lists, 4% of the PH families and 3% of the HCVP families are elderly; 30% of PH and 10% of HCVP families are families with disabilities. In Lorain County, 12% of PH families and 16% of HCVP families housed in Lorain county are elderly; 37% of PH and 45% of HCVP families are disabled. As LMHA redevelops or substantially renovates properties, more accessible and universally designed units will be available to serve the needs of low-income persons described in Elyria's Plan.

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

According to the 2007-2011 American Community Survey, the racial composition of households in the City of Elyria was 84.10% White; 12.89% African American/Black; 0.15% Asian; 0.68% Other races; 1.71% two or more races. The Hispanic or Latino population was 3.43%.

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

1. There is one disproportionately impacted group in terms of having a housing problem: the 0% - 30% AMI Black/African American Group
2. There is one disproportionately impacted group in terms of having a severe housing problem: the 0% - 30% AMI Black/African American Group
3. There is one disproportionately impacted group in terms of having a housing cost burden: the greater than 50% Black/African American Group

In Lorain County, 43% of PH families and 57% of HCVP families on the waiting lists are self-declared as Black/African American, demonstrating that LMHA's housing programs are meeting the needs of the disproportionately impacted groups described by the City of Elyria. For families housed in Lorain County, the rates are 40% of HCVP families and 40% of PH families. In other words, while 13% of Elyria's population is Black/African American, approximately 40% of LMHA's PH and HCVP families are Black/African American.

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

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

[T]he most common housing problem in the City of Lorain is cost burden, for both renter and owner households. Substandard (lacking complete plumbing or kitchen facilities) and overcrowded housing (1.01-1.5 people per room) are also housing problems; however, these problems affect more renters than owners. Severely overcrowded housing (more than 1.5 people per room) is also problem, but not as significant when compared to the prevalence of other housing problems.

Households earning less than 80% AMI are experiencing higher rates of cost burden than those households with higher incomes. More renters are experiencing cost burden than owners, especially those earning less than 30% AMI. Comparisons of cost burden by type of household show that while large related renter and owner households are less affected by cost burden, small related, elderly and other household types are more affected. Substandard and overcrowded housing is more common among renters and owners earning less than 50% AMI. Single family households are more affected by crowding than households with multiple, unrelated members or other non-family households.

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

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

- Housing demolition (e.g. removal of abandoned and blighted housing stock)
- New, quality affordable housing that is attainable to those with low income and located proximate to employment and essential amenities
- Housing rehabilitation (e.g. housing rehabilitation and maintenance assistance, energy efficiency and accessibility retrofits, etc.)
- Improved coordination with housing providers and the Lorain Metropolitan Housing Authority (LMHA) on projects and programs that benefit low income residents
- Self-sufficiency training and case management for all populations (e.g. pathways to homeownership, responsible homeowner/renter/landlord skills, etc.)

On page 57, Lorain's Plan summarizes:

The areas identified as having high concentrations of minority populations also have a high percentage of low and moderate income households. The data seem to indicate a correlation between concentrations of low income and minority race or ethnicity. As indicated in the previous sections, a person's race, income, and disability status are strong indicators for needing housing assistance through various public housing program types.

Although a disproportionate need is shown throughout for minority low income households, the data provided show that White, Black/African American, and Hispanic groups have a high demand for supportive housing of different types. Among these groups, tenant based housing is the most common type of assistance. Families identified as "Families with Disabilities" have a high need for tenant based housing, while at the same time being in need of improved accessibility within existing housing.

B.1b

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

Housing Needs of Housing Choice Voucher Program APPLICANTS as of January 3, 2017			Statistics for Lorain County Households ^{1,2}
NOTE: THE WAITING LIST IS CURRENTLY CLOSED.	# of Families	% of Total Families	
Totals	219	100%	117,298
Extremely low income (<=30% AMI)	189	86.3%	15%
Very low income (>30% but <=50%AMI)	27	12.3%	7%
Low Income (>50% but <80% AMI)	2	0.9%	13%
Families with children	149	68%	31%
Elderly families	6	2.7%	12%
Families with Disabilities	21	9.6%	-
Hispanic	55	25.1%	9%
Non-Hispanic	164	74.9%	91%
White	78	35.6%	85.3%
Black/African American	120	54.8%	8.4%
American Indian/Alaska Native	0	0%	0.3%
Asian	0	0%	1.0%
Native Hawaiian/other Pacific Islander	6	2.7%	0.0%
Multi-racial	12	5.5%	3.6%
Declined to report	3	1.4%	1.4%

Housing Needs of PUBLIC HOUSING APPLICANTS as of January 3, 2017			Statistics for Lorain County Households ^{1,2}
NOTE: THE WAITING LIST IS CURRENTLY CLOSED.	# of Families	% of Total Families	
Totals	3993	100%	117,298
Extremely low income (<=30% AMI)	3703	92.7%	15%
Very low income (>30% but <=50%AMI)	228	5.7%	7%
Low Income (>50% but <80% AMI)	53	1.3%	13%
Families with children	1493	37.4%	31%
Elderly families	153	3.8%	12%
Families with Disabilities	988	24.7%	-
Hispanic	908	22.7%	9%
Non-Hispanic	3085	77.3%	91%
White	1897	47.5%	85.3%
Black/African American	1625	40.7%	8.4%
American Indian/Alaska Native	30	0.8%	0.3%
Asian	3	0%	1.0%
Native Hawaiian/other Pacific Islander	61	1.5%	0.0%
Multi-racial	368	9.2%	3.6%
Declined to report	9	0.2%	1.4%
0 Bedrooms	638	16%	-
1 Bedrooms	1256	31.5%	-
2 Bedrooms	1201	30.1%	-
3 Bedrooms	677	16.9%	-
4 Bedrooms	182	4.6%	-
>4 Bedrooms	39	1%	-

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

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

B.1b

Housing Needs of MULTIFAMILY HOUSING (Harr/International Plazas) APPLICANTS as of December 29, 2016			Statistics for Lorain County Households ^{1,2}
NOTE: THE WAITING LIST IS CURRENTLY CLOSED.	# of Families	% of Total Families	
Totals	139	100%	117,298
Extremely low income (<=30% AMI)	131	94.2%	15%
Very low income (>30% but <=50% AMI)	6	4.3%	7%
Low Income (>50% but <80% AMI)	2	1.4%	13%
Elderly/Near Elderly families	59	42.5%	12%
Families with Disabilities	97	70%	-
Hispanic	28	20.1%	9%
Non-Hispanic	108	77.7%	91%
Declined to Report	3	2.2%	-
White	90	65%	85.3%
Black/African American	39	28%	8.4%
American Indian/Alaska Native	2	1.4%	0.3%
Asian	1	0.7%	1.0%
Native Hawaiian/other Pacific Islander	1	0.7%	0.0%
Multi-racial	0	0.0%	3.6%
Declined to report	6	4.3%	1.4%

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

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

B.1b

Housing statistics of current LMHA families (January 2017)

Total HCVP Families	3179	100.0%
Disabled HOH	1414	44.5%
Elderly HOH	492	15.5%
Hispanic	800	25.2%
Non Hispanic	2379	74.8%
Female HOH	2623	82.5%
Male HOH	556	17.5%
White	1808	56.9%
Black/African American	1280	40.3%
American Indian/Alaskan Native	28	0.9%
Native Hawaiian/Other Pacific Islander	21	0.7%
Asian	2	0.1%
Multi-Racial	40	1.3%

Total Public Housing Families	1385	100.0%
Disabled HOH	511	36.9%
Elderly HOH	169	12.2%
Hispanic	329	23.8%
Non Hispanic	1056	76.2%
Female HOH	991	71.6%
Male HOH	394	28.4%
White	777	56.1%
Black/African American	559	40.4%
American Indian/Alaskan Native	8	0.6%
Native Hawaiian/Other Pacific Islander	21	1.5%
Asian	0	0.0%
Multi-Racial	19	1.4%

Total Multifamily Housing Families (Harr and International Plazas)	192	100.0%
Disabled HOH	171	89.1%
Elderly HOH	77	40.1%
Hispanic	34	17.7%
Non Hispanic	158	82.3%
Female HOH	101	52.6%
Male HOH	91	47.4%
White	140	72.9%
Black/African American	46	24%
American Indian/Alaskan Native	2	1.04%
Native Hawaiian/Other Pacific Islander	0	0.0%
Asian	1	0.5%
Multi-Racial	2	1.04%
Declined to Report	1	0.5%

B.1b

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

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([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\(b\)](#))

LMHA's Deconcentration Policy will not change. *The LMHA conducts an annual deconcentration of poverty and income mixing analysis in accordance with 24 CFR Part 903 Subpart A and records the information in B.1(c).*

Summary of policies governing eligibility, selection and admission (changes are in ***bold italics***)

In 2016, LMHA discontinued the use of local preferences in determining the ranking order of applicants on its Public Housing, Housing Choice Voucher Program and Section 8 New Construction waiting lists. Applicants shall be placed and ranked on the waiting list based upon date and time of application only.

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

Applicants are placed on the list based on date/time of application. Waiting lists for PH are based on bedroom size. LMHA does not maintain site based waiting lists.

During the application process, should an applicant fail to comply with the application process and/or fail to provide required documentation and/or fail to reply to correspondence, their file will be inactivated. The file will be reactivated only within sixty (60) calendar days should the applicant make a written request. There will be no further consideration for file reactivation after sixty (60) calendar days. ***A file may be reactivated one time. If a file is inactivated for a second time, the applicant must reapply.***

Online *pre*-applications will be automatically time and date stamped upon completion. ***Family composition will be determined by the information provided by the applicant when the online pre-application is submitted.*** Bedroom size shall be based upon family composition, ***reasonable accommodations***, and LMHA occupancy standards.

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

Assignment of PH and multifamily housing (Harr and International Plaza) units: Applicants shall be selected in sequence by applicant date and time of application for appropriate size units. Should two (2) or more eligible applicants have identical date and time of application, placement on waiting list shall be determined by any relevant state or federal regulation. The applicant must accept the vacancy offered within three (3) business days of the date the offer is communicated by phone, ***voicemail, or email, or text message, if technologically possible.*** If the applicant cannot be reached by phone ***or email*** contact information listed on ***the*** application within this time frame, then LMHA will offer the unit to next applicant on waiting list. For applicants that could not be reached via telephone ***or email***, they will receive a letter indicating LMHA was unable to reach them by the phone number ***or email address*** provided. This correspondence will inform the applicant to update telephone ***and/or email address*** information so they can be offered next available unit. If there is no response to the request for updated telephone information within ten (10) business days, the applicant will be removed from the waiting list. Consideration of additional time may be given in documented extenuating medical and/or other situations, as well as for reasonable accommodations. If the applicant is removed from waiting list, they would be eligible to reapply in six (6) months.

Financial Resources

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

Financial Resources - Expended on eligible purposes	
1	Federal Grants - Current
	Public Housing Operating Fund \$6,201,911.00
	Public Housing Capital Fund \$1,024,794.00
	HOPE VI Revitalization \$0.00
	HOPE VI Demolition \$0.00
	Annual Contributions for Section 8 Tenant Based Assistance \$21,096,798.00
	Resident Opportunity and Self-Sufficiency Grants \$191,211.00
	Community Development Block Grant \$0.00
	HOME \$0.00
	Other Federal Grants \$0.00
	Shelter Plus Care \$0.00
2	Prior Year Federal Grants(unobligated funds only) \$129,718.00
3	Public Housing Dwelling Rental Income \$1,969,510.00
	<hr/>
	\$30,613,942.00

B.1b

Rent Determination (changes are in bold italics)

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

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

The amounts specifically excluded from income by any other Federal statute as mandated by 24 CFR 5.609(c)(17) are published in the Federal Register and have been historically referred to in the ACOP Appendix VII by reference. The actual list of income exclusions is also in the ACOP.

LMHA will only conduct interim rent recertifications that increase a tenant's rent if the gross monthly household income increases by a minimum of ***five hundred dollars (\$500.00), hereafter called established minimum threshold, unless it is new source of income, e.g., a resident/participant reporting zero income begins to receive income in the household.*** as long as all increases are reported in accordance with policies. Family Self Sufficiency participants may choose whether they want interim income increases under the threshold processed. (Previously, threshold was \$1500.)

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

LMHA has implemented the Earned Income Disallowance (EID).

Minimum Rents

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

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

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

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

Payment standards are 100% of the FMRs.

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

Flat Rents (July 2017)

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

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

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

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

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

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

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

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

B.1b **Flat Rent Policies – How to comply on an annual basis**
In order to comply with the flat rent requirements annually, no later than 90 days after issuance of new FMRs or SAFMRs by HUD, the PHA must:

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

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

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

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

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

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

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

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

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

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

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

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

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

Mixed Families

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

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

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

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

B.1b

Operations and Management (changes are in *bold italics*)

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

LMHA has incorporated the five (5) components of internal control and 17 related principles from Standards for Internal Control in the Federal Government, a.k.a. the "Green Book." These standards form the framework of LMHA's risk assessment process and internal control system and are integrated into the Authority's organizational structure and culture.

LMHA's Public Housing Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher Program Administrative Plan are posted in entirety on www.lmha.org/about-lmha/lmha-policies/. Changes to the policies are listed below.

Admissions and Continued Occupancy Policy (ACOP) Changes (changes are in *bold italics* or struck out)

Page 1. I. ELIGIBILITY

The applicant will not be placed on waiting list until all required documentation is received. Should the applicant fail to comply with the application process and/or providing required documentation, their file will be inactivated. The file will be reactivated only within sixty (60) calendar days should the applicant make a written request. There will be no further consideration for file reactivation after sixty (60) calendar days. *A file may be reactivated one time. If a file is inactivated for a second time, the applicant must reapply.*

PAGE 2. I. ELIGIBILITY. A. FAMILY

A family includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

(1) A family with or without children in which any of the household members are related by blood or marriage or adult members who provide assurance to LMHA, either by affidavit or other documentation, they consider themselves to be in a permanent stable family relationship (the temporary absence of a child from the home due to placement in foster care *or a family or members of a family residing in a domestic violence shelter* shall not be considered in determining family composition and family size). *A temporary absence is defined as one hundred eighty (180) days.*

PAGE 3. II. APPLICATION. A. ACCEPTANCE

Online *pre*-applications will be automatically time and date stamped upon completion. *Family composition will be determined by the information provided by the applicant when the online pre-application is submitted.* Bedroom size shall be based upon family composition, *reasonable accommodations*, and LMHA occupancy standards.

PAGE 3. II. APPLICATION. B. INFORMATION REQUIREMENTS

Split Households: When an LMHA household separates and both co-heads desire to remain in LMHA housing, one may retain the present LMHA unit and the other must apply through the online *pre*-application process. *The pre-application will be reviewed for eligibility. The resident selection plan in effect at the time of the final eligibility determination will be used. If approved, that applicant will receive preference over other residents and applicants.*

PAGE 3. II. APPLICATION. C. CHANGES

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

Page 4. II. APPLICATION. E. TENANT SELECTION AND ASSIGNMENT PLAN

Applicants shall be selected in sequence by applicant date and time of application for appropriate size units. Should two (2) or more eligible applicants have identical date and time of application, placement on waiting list shall be determined by any relevant state or federal regulation. The applicant must accept the vacancy offered within three (3) business days of the date the offer is communicated by phone, *voicemail, or email, or text message, if technologically possible.* If the applicant cannot be reached by phone *or email* contact information listed on *the* application within this time frame, then LMHA will offer the unit to next applicant on waiting list. For applicants that could not be reached via telephone *or email*, they will receive a letter indicating LMHA was unable to reach them by the phone number *or email address* provided. This correspondence will inform the applicant to update telephone *and/or email address* information so they can be offered next available unit. If there is no response to the request for updated telephone information within ten (10) business days, the applicant will be removed from the waiting list. Consideration of additional time may be given in documented extenuating medical and/or other situations, as well as for reasonable accommodations. If the applicant is removed from waiting list, they would be eligible to reapply in six (6) months.

Page 5. II. APPLICATIONS. F. FAMILY COMPOSITION CRITERIA.

The Admissions Department shall utilize the following guideline when housing applicants: ...

(5) Families needing a unit that is larger than the size recommended by LMHA occupancy standards due to a physical or mental disabilities of a household member shall be allowed to apply for the larger unit upon documentation of the need *in accordance with LMHA's Reasonable Accommodation Manual.*

(7) *Families who provide documentation from a court or social service agency of a custody or shared parenting agreement in which a child may live in a unit less than half the time, may, at LMHA's discretion, be permitted to have extra bedroom(s) for those household member(s). Such household members shall not be considered for eligibility for deductions, nor shall they be considered members of the lease agreement.*

(ACOP) Changes, continued

PAGE 5, II. APPLICATIONS, F. FAMILY COMPOSITION CRITERIA

The Admissions Department shall utilize the following guideline when housing applicants:

(6) ... Occupancy by police officers to provide security for public housing residents.

For the purpose of increasing security for residents of a public housing development, 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. When warranted, to increase security in the Development, LMHA will permit one unit per Development to be occupied by an officer who would otherwise be ineligible for occupancy (this is in addition to *any police substations located with the Developments*). The officer will pay the LMHA flat rent amount for the size unit occupied. The officer will sign the lease utilized by all LMHA residents.

Pages 7-9, II. APPLICATIONS, I.REMOVAL FROM THE WAITING LIST

The Housing Authority will document in each applicant's file the date and reason the applicant's name was removed from the waiting list, *also referred to as file inactivation*. Other than ineligibility, the PHA will *inactivate a file*/remove an applicant from the waiting list for the following reasons:

(1) At the request of the applicant (*i.e., the file will be inactivated*).

(2) The applicant no longer meets the eligibility requirements for the property or program (*i.e., the file will be inactivated*).

(3) Non-compliance with supplying required information and/or documents. *If an applicant fails to respond to a mailing from the PHA, the applicant will be sent a second written notification and given ten (10) business days to contact the PHA. If they still fail to respond, they will be removed from the waiting list. An extension will be considered an accommodation if requested by a person with a disability.*

Any second/final mailings to the applicant which require a response will state that failure to respond within a specified time frame will result in the applicant's name being removed from the waiting list (i.e., the file will be inactivated).

(4) Failure to attend the required interview. Applicants are given one (1) opportunity to attend. *Applicants may request to be rescheduled one (1) time by contacting the Placement Department within ten (10) business days following their scheduled interview date. Additional consideration will be given for reasonable accommodations. If the appointment is not rescheduled within ten (10) business days, the file will be inactivated.*

(5) The applicant is unable to obtain utility service (gas or electric) to lease the unit offered. *This is considered unit refusal.*

(6) Mail sent to the applicant's address is returned as undeliverable. *If a letter is returned by the Post Office, the applicant will be removed from the waiting list (i.e., the file will be inactivated) without further notice, and the envelope and letter will be maintained in the file.*

(7) The applicant fails to lease the unit accepted *within five (5) business days of initial contact by the management leasing office. LMHA will consider an extension for documented extenuating circumstances or for reasonable accommodations. Failure to lease a unit is considered unit refusal.*

(8) The applicant has been offered unit/units in accordance with policy and has refused unit/units. LMHA is unable to assist the applicant with housing.

If a file is inactivated, the file will be reactivated only within sixty (60) calendar days should the applicant make a written request. There will be no further consideration for file reactivation after sixty (60) calendar days. A file may be reactivated one time. If a file is inactivated for a second time, the applicant must reapply.

If an applicant refuses a unit without good cause or an approved reasonable accommodation, the applicant shall be removed from the waiting list and will be eligible to reapply in six (6) months.

PAGE 12, III. VERIFICATION, 2(a)(b)(1) INTERIM RECERTIFICATION PROCEDURE

All increases in household income except that:

(a) LMHA will only conduct interim rent recertifications that increase a tenant's rent if the gross monthly household income increases by a minimum of *five hundred dollars (\$500.00), hereafter called established minimum threshold, unless it is new source of income, e.g., a resident/participant reporting zero income begins to receive income in the household*, as long as all increases are reported in accordance with policies. Family Self Sufficiency participants may choose whether they want interim income increases under the threshold processed.

PAGE 13, III. VERIFICATION, 2(a)(b)(2) INTERIM RECERTIFICATION PROCEDURE

Change in family (which could either provide additional income to the household or reduce the deductions and allowances for which the family qualifies to the extent the household monthly increase in income exceeds *the established minimum threshold*. When adding an adult with income to household, there will an interim change adding income, in turn causing increase in household income and rent regardless of *the established minimum threshold*.

(ACOP) Changes, continued

Pages 13-14, III. VERIFICATION, 3. UNREPORTED INCOME POLICY & REPAYMENT AGREEMENTS

Tenants are required to report income changes in writing within ten (10) business days of the change. Wherein the tenant fails to report an income change that results in an increase in rent regardless of the *established minimum threshold*, the rent shall be effective the first day of the month following the month in which the change occurred. The tenant will be responsible for the retro-active rent amount, which is the difference between what the rent would have been had the change in income/family composition been reported as required, and the amount the tenant was charged for monthly rent

At the discretion of the Project Manager, a repayment plan may be offered to the tenant for the retroactive rent amount. Should the Project Manager determine that deliberate and willful misrepresentation has occurred, the Project Manager may proceed with a lease termination rather than offer the repayment agreement.

Tenants can repay amounts due for retroactive rent:

- 1. In a lump sum payment; or***
- 2. By entering into a repayment agreement with LMHA; or***
- 3. A combination of 1 and 2, above.***

For example, a tenant may owe \$1,000, make a lump sum payment of \$300 and enter into a repayment agreement for the remaining \$700.

Tenants who do not agree to repay amounts due in accordance with the above will be in noncompliance with their lease agreement and may be subject to termination of tenancy.

The monthly retroactive rent payment plus the tenant's Total Tenant Payment (TTP) at the time the repayment agreement is executed should be affordable and not exceed 40% of the family's monthly adjusted income, unless the tenant and LMHA agree to a higher amount. However, the LMHA has the discretion to establish thresholds and policies for repayment agreements in addition to HUD required procedures. The threshold for a tenant with no income (and no utility reimbursement payment (URP) check) will be the lesser of \$20.00, or 40% of the minimum rent amount in place at the time the repayment agreement is signed. The terms of the agreement may be renegotiated if there is a decrease or increase in the family's income.

If a tenant has agreed to the terms of a repayment agreement for retroactive rent, and if the tenant subsequently incurs an additional charge for retroactive rent which LMHA deems was not due to deliberate or willful misrepresentation by the tenant, then LMHA may offer the tenant another repayment agreement for retroactive rent which may be combined with the first agreement.

If, however, LMHA deems that the charge for retroactive rent was due to deliberate or willful misrepresentation by the tenant, then LMHA shall not offer another repayment agreement and shall instead proceed with lease termination.

LMHA will not offer repayment agreements for current or overdue rent.

The above repayment policy for unreported income is *not applicable to repayment agreements for maintenance and/or other non-retroactive rent charges. If a tenant is in compliance with the terms of a retroactive rent repayment agreement and incurs charges not related to retroactive rent for which the tenant requests a repayment agreement, then LMHA may agree to offer the tenant a second repayment agreement for the new charges. Repayment Agreements for charges other than retroactive rent are not subject to the 40% threshold.*

Pages 15, III. VERIFICATION, B. INTERVIEW FORMS

At the time of Annual Recertification, the following forms will also be required:

AUTHORIZATION FOR RELEASE OF INFORMATION PRIVACY ACT NOTICE (HUD 9886)

PERSONAL DECLARATION FORM

WHAT YOU SHOULD KNOW ABOUT EIV A Guide for Applicants & Tenants of Public Housing & Section 8 Programs

HUD FORM 92006 Supplemental and Optional Contact Information for HUD Assisted Housing Applicants

COMMUNITY SERVICE ANNUAL ACKNOWLEDGEMENT, signed by each adult member of the household acknowledging that they have received and read the policy and understand that if they are not exempt, failure to comply with the community service requirement will result in nonrenewal of their lease, per 24 CFR 966.4(l)(2)(iii)(D).

PAGE 18, III. VERIFICATION, C. VERIFICATION PROCEDURES

Level 1:

- ▶ printed wage stubs ~~with the individual's social security number printed on the wage stub~~

Page 20-24, IV Rents, Flat Rents

See complete Flat Rent Policy on pages 10-11 of this Annual Plan.

PAGE 23, VIII GRIEVANCE PROCEDURE

VIII. GRIEVANCE PROCEDURE. The purpose of the grievance procedure is to assure a PHA tenant is afforded an opportunity for a hearing if the tenant disputes any PHA action or failure to act, involving the tenant's lease with the PHA or PHA regulation which adversely affects the individual tenant's rights, duties, welfare or status. The tenant must notify the PHA within ten (10) business days of the occurrence which they wish to grieve. ***See Appendix XVI for the complete Grievance Procedure.***

B.1b

(ACOP) Changes, continued

APPENDIX I. DEFINITION OF TERMS

Administrative Review. Administrative Reviews are granted to Lorain Metropolitan Housing Authority (LMHA) program applicants that are proposed for denial based on unfavorable information received from a criminal background check, and or Good Cause as per LMHA's ACOP policy.

Felony. A serious crime for which the punishment is prison for more than a year or death (ORC 2903.11).

Misdemeanor . A class of criminal offenses consisting of those offences less serious than felonies and which are sanctioned by less severe penalties. It is generally distinguished from a felony by the duration or place of imprisonment and the severity of the possibility or actual punishment.

Temporary. Temporary is defined as *one-hundred eighty (180)* days or less.

APPENDIX V. AIR CONDITIONING POLICY, WATER SURCHARGE POLICY, AND UTILITY ALLOWANCE

The air conditioning surcharge calculations were updated based upon historical temperature date from 2014, 2015, and 2016. The revised surcharges are effective June 1, 2017 through September 15, 2019.

Following are the fees:

Install a/c in a room with more than one window ¼ hour labor min + materials (not to exceed *one hour labor charge*)

Confirm safe/proper installation of tenant installed a/c and/or remove if necessary... *One hour labor charge*

The fees for a tenant-provided a/c units in family developments was revised to reflect \$30.96 *per air conditioner*/year

APPENDIX VII. ANNUAL INCOME

C. Annual Income does not include the following:

6. Subject to paragraph (B) (10) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;

APPENDIX IX EIV POLICY

HUD defines a substantial difference as one that is two hundred dollars (\$200.00) or more per month. LMHA's interim policy does not require an interim rent change be processed unless the gross monthly income increases by more than the *established minimum* threshold per month unless it is an additional source of income, e.g., a resident/participant reporting zero income begins to receive income in the household (regardless of amount). The *established minimum* threshold for interim rent changes is applicable to LMHA's Public Housing Program only.

The repayment agreement language in the EIV Policy has been amended to coincide with the language in ACOP III. VERIFICATION, 3. UNREPORTED INCOME POLICY & REPAYMENT AGREEMENTS.

APPENDIX X COMMUNITY SERVICE ADMINISTRATION POLICY

The following language from Notice PIH 2015-12 was added:

Self-Sufficiency: Eligible self-sufficiency activities include, but are not limited to:

- A. *Job readiness or job training;*
- B. *Training programs through local One-Stop Career Centers, Workforce Investment Boards (local entities administered through the U.S. Department of Labor) or other training providers;*
- C. *Higher education (junior college or college);*
- D. *GED classes;*
- E. *Apprenticeships (formal or informal);*
- F. *Substance abuse or mental health counseling;*
- G. *Reading, financial and/or computer literacy classes;*
- H. *English as a second language and/or English proficiency classes;*
- I. *Budgeting and credit counseling; and,*
- J. *Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF).*

Community Services: Eligible community service activities include, but are not limited to, work at:

- A. *Local public or nonprofit institutions, such as schools, Head Start Programs, before-or after-school programs, childcare centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult daycare programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing);*
- B. *Nonprofit organizations serving PHA residents or their children, such as: Boy or Girl Scouts, Boys or Girls Club, 4-H Clubs, Police Activities League (PAL), organized children's recreation, mentoring, or education programs, Big Brothers or Big Sisters, Garden Centers, community clean-up programs, beautification programs;*
- C. *Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels;*
- D. *Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods or performing arts;*
- E. *PHA housing to improve grounds or provide gardens (so long as such work does not alter the PHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board; and,*
- F. *Care for the children of other residents so parents may volunteer.*
- G. *LMHA accepts community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work.*

(ACOP) Changes, continued

APPENDIX XI VAWA POLICY

The following reference was added to the VAWA Policy:

Refer to the Emergency VAWA Transfer Plan in the LMHA Transfer Policy for situations involving emergency situations.

APPENDIX XV PET POLICY/ASSISTANCE ANIMAL ADDENDUM

LMHA proposes to amend the Assistance Animal Lease Addendum by requiring tenants to provide contact information for the individual who will retrieve and care for the Assistance Animal in case the tenant is unable to do so (e.g., hospitalization, incapacitation or death).

APPENDIX XII APPLICANT SCREENING PROCESS

The screening policy for applicants for all LMHA housing programs has been updated and is printed in its entirety on pages 23-24 of this document.

APPENDIX XIII EVICTION POLICY

The Policy regarding termination of lease and eviction has been modified to reflect changes in the public housing lease and more clearly describe LMHA's practices.

APPENDIX XIV TRANSFER POLICY (revised) and **EMERGENCY VAWA TRANSFER PLAN** (completely new, added to the Transfer Policy)

TRANSFER POLICY

Lorain Metropolitan Housing Authority (LMHA) will maintain a centralized transfer list to ensure that transfers are processed consistently and in the appropriate order. No transfers will take place in the months of May or June, other than for Reasonable Accommodations, emergencies, or if deemed to be in the best interest of the Housing Authority.

No transfers will be granted during the first two (2) years of the lease/housing other than for emergencies, Reasonable Accommodations, or for Emergency VAWA Transfers.

Except in the cases of Reasonable Accommodations or Emergency VAWA Transfers, residents will receive one (1) offer of a transfer. Refusal of a transfer unit offer without good cause may result in removal from the transfer waiting list. In the case of mandatory transfers, refusal without good cause may result in lease termination.

LMHA shall bear the costs of Reasonable Accommodations transfers and for transfers initiated by LMHA. Residents shall be responsible for the costs of occupancy-related transfers and resident-initiated transfers.

The Grievance Procedure is applicable to involuntary transfers.

Transfers shall be prioritized as follows:

1. Emergency Transfers

Emergency transfers are mandatory when LMHA determines that conditions pose an immediate threat to resident life, health, or safety. Emergency transfers may be made for reasons such as, but not limited to, permitting repair of hazardous unit defects, alleviating verified disability problems of a life threatening nature, protecting household members from threat of physical harm or criminal activity, or Emergency VAWA Transfers.

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking is eligible for an emergency transfer if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. Refer to the Emergency VAWA Transfer Plan for complete details.

Emergency transfers shall take priority over new admissions and all other transfers. If, however, the only suitable unit available is an accessible unit designated to fulfill a request for a reasonable accommodation, then the reasonable accommodation shall have precedence.

2. Reasonable Accommodation Transfers

The LMHA Reasonable Accommodations Review Committee may approve a transfer as a reasonable accommodation for a person with a disability, provided that there is a nexus between the disability and the accommodation as verified in accordance with LMHA's Reasonable Accommodations Manual.

Reasonable Accommodation transfers shall take priority over new admissions.

3. Violence Against Women Act (VAWA) Transfers

Transfers for the victims of domestic violence (VAWA) shall take priority over new admissions.

B.1b (ACOP) Changes, Transfer Policy, continued

4. Under-housed Families

The Project Manager may approve/require a transfer to correct over-occupancy of a PHA unit. Transfers granted to remedy over-occupancy shall be within the same development. To minimize vacancies/transfers, new born infants [up to the age of two (2)] may share a bedroom with the parent before a transfer is required by the PHA.

These transfers shall take priority over new admissions and will be processed at no more than one (1) transfer, per bedroom size, per development, per month.

5. Over-housed Families

The Project Manager may approve/require a transfer to correct under-occupancy of a PHA unit. Transfers granted to remedy under-occupancy shall be within the same development.

These transfers will not take priority over new admissions and will be processed at no more than one (1) transfer, per bedroom size, per development, per month.

LMHA may elect, at its discretion, to not transfer over-housed families in order to prevent vacancies.

6. Resident-Requested Transfers

The Executive Director may approve a transfer to accommodate the employment or educational activities of a household. The household shall demonstrate that the family member has been so employed for a period of one hundred eighty (180) days prior to the request for transfer, or that they are enrolled in the educational institution.

These transfers will not take priority over new admissions and will be processed at no more than one (1) transfer, per bedroom size, per development, per month.

The Executive Director may require or approve a transfer within LMHA owned and/or managed properties, where in the opinion of the Executive Director, such transfer is reasonable or necessary to correct, remedy, or alleviate any condition or circumstance that, in opinion of the Executive Director, is adverse to the interest or purposes of LMHA and/or its operations.

LMHA reserves the right to require a transfer when a family is initially given an accessible unit, or the family's unit is rehabilitated to provide accessible features, but the family does not require or no longer requires the accessible features. When a unit with accessibility features becomes vacant, LMHA shall make its best effort to ensure that a family requiring these features is assigned to the unit. If there are no families requiring said features on the transfer waiting list, a new admission shall be offered the unit.

For Resident-Requested transfers, the following eligibility requirements apply (which do not apply to Reasonable Accommodations or Emergency VAWA transfers):

- 1. Residents must pass a house inspection prior to transferring.*
- 2. If required to perform community service, the resident must be up to date in the required hours.*
- 3. If applicable, residents must be up-to-date in rental payments and maintenance charges, must be able to transfer utility service, be in good standing based upon rental history and not have a documented history of disturbances. The resident must not be under termination of lease. This does not apply to reasonable accommodations requests or emergency VAWA transfers.*

LMHA reserves the right to waive any of the eligibility requirements if deemed in the best interest of the Housing Authority.

"Good cause" is defined as:

- 1. Inaccessibility to source of employment, education, job training, children's day care, education program for children with disabilities, a change in school districts, or inaccessibility to resources that provide support to an individual's physical or mental health and well being. Additionally, a good cause exception would also be granted if acceptance of the unit offer would require a household member to quit a job, drop out of an educational institution, take a child out of daycare, remove a child from an educational program for children with disabilities or cause a child to change school districts.*
- 2. The family demonstrates to LMHA's satisfaction that the acceptance of the unit offer will place a family member's life, health, or safety in jeopardy. The family must offer specific and compelling documentation such as restraining orders, other court orders or documents from a law enforcement agency or other local, state or, mental health agencies. Reasons must be specific to the family.*
- 3. A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members or live-in aide necessary to the care of the principal household member.*

Refusals due to location alone do not qualify for the good cause exemption.

Reasonable Accommodations may also be considered as a good cause for rejecting a unit offer for transfer, but are reviewed for approval by the Reasonable Accommodations Review Committee.

LMHA will not grant a transfer request solely to accommodate neighbors who cannot get along.

B.1b

(ACOP) Changes, Transfer Policy, continued

EMERGENCY VAWA TRANSFER PLAN

*Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
June 2017*

Lorain Metropolitan Housing Authority (LMHA) is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),¹ LMHA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of Lorain Metropolitan Housing Authority to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether LMHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan (OMB Approval No. 2577-0286) published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that the Lorain Metropolitan Housing Authority is in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify the LMHA's management office and submit a written request for a transfer. LMHA will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

- 1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under LMHA's program; OR*
- 2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.*

Confidentiality

Lorain Metropolitan Housing Authority will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives LMHA written permission to release the information on a time-limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. (See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about LMHA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.)

Emergency Transfer Timing and Availability

Lorain Metropolitan Housing Authority cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. LMHA will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. LMHA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If LMHA has no safe and available units for which a tenant who needs an emergency is eligible, LMHA will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, LMHA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are listed at the end of this plan.

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

B.1b (ACOP) Changes, Emergency VAWA Transfer Policy, continued

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

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>.

The following local organizations offer assistance to victims of domestic violence, dating violence, sexual assault, or stalking:

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

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

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

*Lorain County Board of Mental Health
1173 North Ridge Road, East
Lorain, OH 44055
440.233.2020
24/7 Emergency/Crisis Hotline: 800.888.6161*

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

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

*Far West Center/Amherst
554 N. Leavitt Road
Amherst, Ohio 44001
440.988.4900*

APPENDIX XV PET POLICY/ASSISTANCE ANIMAL ADDENDUM

The Assistance Animal Addendum was amended to include the definition of dangerous, nuisance, and vicious animals from the Ohio Revised Code. The Assistance Animal Application form was amended to include contact information for the person responsible to care for the tenant's assistance animal in case of emergency.

B.1b

(ACOP) Changes, continued

APPENDIX XVII SMOKE-FREE POLICY

On May 29, 2012, HUD issued a notice that strongly encouraged Public Housing Authorities to implement smoke-free policies in some or all public housing units. No later than 18 months of the effective date of HUD's Final Rule of February 3, 2017, each PHA must implement a "smoke-free" policy banning the use of prohibited tobacco products in all public housing living units, indoor common areas in public housing, and in PHA administrative office buildings. Effective May 1, 2018, the Lorain Metropolitan Housing Authority (LMHA) will officially become a smoke-free environment. Smoking will not be allowed in common areas, resident units, offices and within twenty-five (25) feet of all doors and windows. Smoking will only be allowed in designated areas.

Background

The Lorain Metropolitan Housing Authority is implementing this policy because we are concerned with secondhand smoke and the affect it has on the health of our residents and the community. On November 15, 2016, we began the "We Care Healthy Homes Initiative" campaign to have a smoke-free environment. By going smoke-free, we are improving the overall health of the community, reducing tenant complaints, and reducing maintenance cost. There is no safe level of secondhand smoke exposure because smoke drifts throughout a building. It can enter through ceiling crawl spaces, light fixtures and walls, and seeps under and around doors. Ventilation systems do not protect families from secondhand smoke. Most air filter systems are designed to remove odors, not the toxic particles from tobacco smoke. The Environmental Protection Agency (EPA) lists secondhand smoke as a Class A Carcinogen, the most toxic class of chemicals that are known to cause cancer in humans. Secondhand smoke is the leading trigger of asthma attacks and other respiratory problems and a known cause of Sudden Infant Death Syndrome (SIDS).

Existing Laws Allows For Smoke-Free Housing

Even though smokers feel that it is their right to smoke in their units, there is no Federal or State law that prohibits a property owner from implementing a smoke-free policy for their buildings or grounds and there is no legal right to smoke in federally subsidized housing. Smoke-free policies do not infringe on the legal rights of individuals because smokers are not a protected class under any state or federal law. Smokers may feel that it is their constitutional "right to smoke," which is untrue since the U.S. Constitution does not extend special protection to smokers, because there is no fundamental right to smoke. Fair housing laws do not apply to smokers, but they may be applicable when secondhand smoke infiltrates non-smoking housing units.

Definition of Smoking

Inhaling, exhaling, burning, or carrying any lighted cigar, cigarette, pipe, or other lighted smoking devices for burning tobacco or any other plant.

Notice to Residents

The first letter was sent to residents in December 2016 to inform them of the policy change. A second letter will be sent in January 2017 reminding them that the policy will begin May 1, 2018. It will also inform residents that all lease holders must sign a lease addendum.

Potential Residents

We Care Healthy Homes Initiative information should be provided to all applicants.

Signage

LMHA shall post non-smoking signs at entrances and exits, in common areas, and in conspicuous places adjoining the grounds of the Non-Smoking Area. Signs are prominently place to let residents and guests know there is no smoking in the buildings. "This is a smoke-free building" signs are placed by the door outside the building "No smoking" signs are in the lobby, community room, office and any other common area.

Designated Smoking areas

If, in LMHA's sole discretion, the property size and configuration allow, LMHA may designate and clearly identify a specific outdoor area where smoking is permitted. If a designated area has not been identified at the property, then smoking shall be permitted at least 25 feet away from any window or door of the LMHA structure. If a designated smoking area is established, smoking on the premises must be confined to and occur only within that designated smoking area.

Enforcement

The policy will be effective May 1, 2018. Smoking in an apartment is treated like any other lease violation. If the violation persists, a termination notice can be issued.

When staff witnesses a violation or a resident complaint is received, LMHA staff will enforce the non-smoking policy according to the following procedures:

First Offense: Staff will send the resident a reminder of the non-smoking policy to include a copy of the Non-Smoking Lease Addendum signed by the resident household, linkage to cessation services and their resident services representative. A referral should also be completed to refer the resident to their resident services representative for assistance in complying with the non-smoking policy.

Second Offense: Staff will visit the household. Evidence will be gathered by looking for signs of smoking, including stains on the walls, ash trays inside the unit and burn marks. Staff will document where tobacco and other plant smoke odors are present inside the building and take pictures where appropriate. All unit inspections due to witnessed or reported smoking violations will be documented in writing even if evidence is not collected or found.

B.1b

(ACOP) Changes, Smoke Free Policy, continued

A resident's household will be determined to be in violation of the policies if:

1. *Staff witnesses a resident, resident's guest, or family member, service provider, or other person smoking within the unit or within 25 feet of the building. "Other person" is defined as "an invitee or guest of the tenant, the tenant's family or otherwise on the premises with the knowledge of the tenant or member of tenant's family."*
2. *Staff witnesses a lighted smoking product in an ashtray or other receptacle in the unit or within 25 feet of the building*
3. *Damages to the interior of LMHA owned subsidized units that are the result of burns caused by smoking products including burns to resident owned property.*
4. *Evidence of smoking in a unit such as cigarette or other smoking products smells, smoke clogged filters, smoke film including damage to walls*
5. *Repeated reports to staff of violations of LMHA's non-smoking policy by third parties.*
6. *Clogged plumbing caused by a smoking product or products*
7. *Evidence of ashes on any surface in a LMHA owned subsidized unit*

Staff will send the resident a written letter of the findings of their inspection and second reminder of the non-smoking policy including a copy of the Non-Smoking Lease Addendum signed by the resident household, linkage to cessation services and their resident services representative. Resident will be advised that further lease violations will result in further action, up to and including Termination of the Lease.

Third Offense: Staff will send the resident a letter to attend a mandatory conference to discuss the policy and repeated violations. When feasible both the property manager and resident services representative will be present for the conference to assist the resident in developing strategies to help them comply with the policy in order to safeguard their housing. During this conference, the resident will be required to sign a last chance agreement. If the resident fails to attend the conference or sign the last chance agreement, the resident's file will be documented accordingly.

Fourth Offense: Staff will issue a 30 day notice. At this time the resident will not be given an option to cure. In the event a 30 day notice is issued for violation of the non-smoking policy, the resident is still afforded their right to request a hearing according to the grievance procedure.

Resident Service Engagement

Resident Service Coordinators will provide residents with training to assist residents to stop smoking. We understand how difficult it is to quit smoking so they will work with the Lorain County General Health District to offer smoking cessation programs. They will coordinate special meetings where residents will receive information on the risk of secondhand smoke.

Landlord Not a Guarantor of Smoke-Free Environment

LMHA's adoption of a smoke-free living environment, and the efforts to designate the rental complex as smoke-free, do not make LMHA or any of its managing agents the guarantor of Tenant's health or of the smoke-free condition of the Tenant's unit and the common areas. However, LMHA shall take reasonable steps to enforce the smoke-free terms of its leases and to make the complex smoke-free. Landlord is not required to take steps in response to smoking unless Landlord knows of said smoking or has been given written notice of said smoking.

Disclaimer. LMHA's adoption of a smoke-free living environment, and the efforts to designate the rental complex as smoke-free, does not in any way change the standard of care that the Landlord or managing agent would have to a Tenant household to render buildings and premises designated as smoke-free any safer, more habitable, or improved in terms of air quality standards than any other rental premises. Landlord specifically disclaims any implied or express warranties that the building, common areas, or Tenant's premises will have any higher or improved air quality standards than any other rental property. Landlord cannot and does not warranty or promise that the rental premises or common areas will be free from secondhand smoke. Tenant acknowledges that LMHA's ability to police, monitor, or enforce this policy is dependent in significant part on voluntary compliance by Tenant and Tenant's guests. Tenants with respiratory ailments, allergies, or any other physical or mental condition relating to smoke are put on notice that Landlord does not assume any higher duty of care to enforce this policy than any other landlord obligation under the Lease.

Overall Impact of the Smoke-Free Policy

The Smoke-free policy will improve the condition of individual units and it will eventually reduce the turnover cost related to smoke related damages. It will provide site staff with equal access to a non-smoking work environment and most importantly it will create healthier communities.

Housing Choice Voucher Program Administrative Plan (changes are in *bold italics* or struck out in red)

Page 28: Chapter 2, Section F: *Refer to the LMHA Applicant Screening Process Chapter 3, Section H for the complete description of the criminal history background check procedures.*

Chapter 3, page 32: added “**Pre-**” to the word “application” when it refers to online applications. Also added “**online**” where relevant.

Page 33, Chapter 3.B Opening/Closing of Application Taking: added “www.lmha.org and social media” to the list of places advertised. Excellent public comment.

Page 34 Closing the Waiting list – removed redundant “The open period shall be long enough to achieve a waiting list adequate to cover projected turnover over the next 24 months. The PHA will give at least 5 days notice prior to closing the waiting list.”

In Chapter 3, Section 3, page 35, the list of information requested in the online pre-application was shortened to reflect the actual pre-application questions.

LMHA removed:

- Amount(s) and source(s) of income received by household members
- Information regarding Disabilities relating to program requirements (i.e., deductions)
- Arrests and/or Convictions for Drug Related or Violent Criminal Activity
- Program integrity questions regarding previous participation in HUD programs

Added what is on the pre-app now:

- Number of Bedrooms preferred*
- Listing all states in which applicant has resided*
- Request for Specific Accommodation needed to fully utilize the program and services*
- Whether applicant currently receives housing assistance*

Page 36 and 50: added “(i.e., *the file will be inactivated*)” after “removed from waiting list.”

Page 37: If an applicant fails to appear for a prescheduled appointment, the PHA will not automatically reschedule a second appointment. *Applicants are given one (1) opportunity to attend. Applicants may request to be rescheduled one (1) time by contacting the Placement Department within ten (10) business days following their scheduled interview date. Additional consideration will be given for reasonable accommodations. If the appointment is not rescheduled within ten (10) business days, the file will be inactivated.*

The file will be reactivated only within sixty (60) calendar days should the applicant make a written request. There will be no further consideration for file reactivation after sixty (60) calendar days. A file may be reactivated one time. If a file is inactivated for a second time, the applicant must reapply.

Adding “business” to “10 days” on page 49 to read:

Changes in an applicant’s circumstances while on the waiting list may affect the family’s entitlement. Applicants are required to notify the PHA in writing *within 10 business days* when their circumstances change.

Page 39, Chapter 3, Section H: The Applicant Screening Process listed on pages 20-22, below, replaces the existing basis for ineligibility.

Page 42, Chapter 4, Section I Removal From Waiting List and Purging. If an applicant is removed from the waiting list for failure to respond, they will not be entitled to reinstatement unless they can provide documentation proving circumstances were beyond the person’s control (i.e., a medical emergency). *A file may be reactivated one time. If a file is inactivated for a second time, the applicant must reapply.*

Page 50: Since we don’t do this I deleted: If a letter is returned with a forwarding address, it will be re-mailed to the address indicated.

Page 106, Chapter 9, Section K. Contract Execution Process. The HCVP *personnel* will execute the contract on behalf of the PHA.

Page 107, Chapter 8, Section D. ASSISTANCE TO FAMILIES WHO CLAIM DISCRIMINATION: Fair Housing Laws: The PHA provides the family with the HUD discrimination complaint form. The family will also be directed to the ~~Lorain County Urban League Fair Housing and Equal Opportunity division at HUD (800-669-9777)~~ to file complaints.

Page 116, Chapter 10, Section A. Guidelines/Types of Inspections. If the tenant is responsible for supplying the stove and/or refrigerator, the PHA will not consider the unit as meeting Housing Quality Standards *if the appliances are not in place at the time of inspection*. The family will be mailed a “Stove and Refrigerator Certification”. The family must sign and submit *form certifying the appliances will be or are installed and properly working*.

Page 128, Chapter 10, Section I. Determination of Responsibility. Infestation: *The owner shall exterminate vermin and other infestations as may be necessary to keep the premises in a fit and habitable condition; provided, however, that where an infestation is repeated and caused by housekeeping habits that were previously made known to the family by the owner or pest controller, it may be considered a lease violation and cause for eviction. The PHA may also terminate the family’s assistance on that basis.*

Page 164, Chapter 15, Section A, Mandatory Denial and Termination: *If any member of the household is subject to a lifetime sex offender registration under a State sex offender registration program.*

Page 164-5, Chapter 15, Section A, Grounds for Denial or Termination of Assistance: Any member of the household has ever been evicted from public housing *within the last five-three (3) years*.

If any member has failed to meet financial obligations and/or currently owes rent or other amounts to the LMHA in connection with a previous tenancy or HCVP participation, *including community service hours*.

B.1b **Housing Choice Voucher Program Administrative Plan, continued**

Page 166, Chapter 15, Section B, Screening of Applicants: *Refer to the Applicant Screening Process in Chapter 3, Section H.*

Page 168 regarding drug related criminal activity by applicant or participants. Added:

An arrest of applicant for a disqualifying offense, shall not, in and of itself, be a conclusive determination that the applicant engaged in disqualifying criminal activity but may be considered as a factor in the consideration of the totality of the facts and circumstances of any given incident.

Page 169, Chapter 15, Section B, Denial of Assistance for Sex Offenders: The PHA will *permanently* deny admission/participation ~~if~~of any member of the household *who is a reported sexual offender subject to a lifetime sex offender registration* under a State sex offender registration program.

Page 200, Chapter 19, Verification of Need for a Reasonable Accommodation: Acceptable documentation as verification of the need for reasonable accommodation would be a written letter to the PHA describing how the special housing type requested provides the accommodation of which the person is in need from one or more knowledgeable professionals *or another third party* who are familiar with the applicant/participant and/or the type of special housing requested. The request *will be processed in accordance with LMHA's Reasonable Accommodations Procedure Manual and documentation will be reviewed and a written response stating approval or disapproval will be sent to the applicant/participant within 10 days of receipt of the request.*

Page 213 Glossary: The definition of "family" was corrected to match the definition on page 22.

Page 210: **ADMINISTRATIVE REVIEW.** *Administrative Reviews are granted to Lorain Metropolitan Housing Authority (LMHA) program applicants that are proposed for denial based on unfavorable information received from a criminal background check, and or Good Cause as per LMHA's Applicant Screening Process.*

Page 214: **FELONY.** *A serious crime for which the punishment is prison for more than a year or death (ORC §2903.11). (July 2017)*

Page 218: **MISDEMEANOR.** *A class of criminal offenses consisting of those offences less serious than felonies and which are sanctioned by less severe penalties. It is generally distinguished from a felony by the duration or place of imprisonment and the severity of the possibility or actual punishment.*

Page 279 Appendix 2 – UIV/EIV (income verification) Policy. HUD defines a substantial difference as one that is \$200 or more per month. LMHA's HCVP interim policy no longer requires an interim rent change unless there is a reduction in income, change in household composition, quarterly agreements, family qualifies for EID or for the purposes of increasing the family's rent for FSS purposes. There is a \$500 threshold for interim rent changes applicable to LMHA's Public Housing *and \$200* for Section 8 New Construction.

Page 285 VAWA Policy was updated: *Family break-up. If the family break-up results from an occurrence of domestic violence, dating violence, sexual assault or stalking as provided by 24 CFR part 5, subpart L (Protections for Victims of Domestic Violence, Sexual Assault or Stalking), the PHA must ensure that the victim retains assistance. (24 CFR 982.315)*

B.1b The Applicant Screening Process was updated for all LMHA housing programs: Public Housing, Housing Choice Voucher Program, and Multifamily housing.

Applicant Screening Process

Revised July 1, 2017

After verification of all pertinent data required determining eligibility, applicants shall be notified of their eligibility/ineligibility. The basis for ineligibility determination may include, but is not limited to:

- (1) *Over-income. The applicant's family income exceeds the HUD published income limits for Lorain County.*
- (2) *Misrepresentation. The applicant has committed fraud in connection with any federally assisted housing program, or has provided false information about their criminal history.*
- (3) *Financial Obligation. The applicant has failed to meet financial obligations, especially rent; and/or currently owes rent or other amounts to LMHA in connection with a previous tenancy or Section 8 participation. The applicant is unable to secure utility service (gas and/or electric). Solely at LMHA's discretion, an individual may be placed on the waiting list and lease a unit owing money to LMHA if LMHA determines the applicant merits another change in LMHA housing. An applicant owing money to LMHA must provide documentation to the Housing Authority which the PHA shall use to determine if the applicant merits housing prior to payment in full of the balance owing LMHA. The applicant shall be required to sign a repayment agreement indicating the payment schedule for the balance due LMHA. Failure to comply with the agreement shall result in removal from the waiting list or termination of the lease if the applicant has been housed.*
- (4) *A history of disturbing neighbors.*
- (5) *Incidents of property destruction.*
- (6) *Living or housekeeping habits which could adversely affect the health, safety or welfare of other tenants.*
- (7) *A history or pattern of criminal activity involving crimes to persons or property and/or other criminal acts that affect the health, safety, or right to peaceful enjoyment of the premises by other tenants.*
- (8) *Current or recent release from incarceration/parole/probation; or a community control program or any other court supervised intervention program which requires reporting to the court or agency.*
- (9) *An eviction from federally assisted housing or termination from the Housing Choice Voucher Program within three (3) years because of drug-related criminal activity of any household member. However, the household may be admitted if LMHA determines that the evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by LMHA, or the circumstances leading to eviction no longer exist.*
- (10) *LMHA determines an applicant is illegally using a controlled substance.*
- (11) *LMHA has reasonable cause to believe an applicant illegally uses a controlled substance or abuses alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other tenants.*
- (12) *The inability to abide by a lease, or being unable to legally enter into a lease.*
- (13) *Registration as a sexual offender. Persons subject to a lifetime sex offender registration under a State sex offender registration program are permanently prohibited from admission to housing.*
- (14) *Was previously evicted and/or moved out of LMHA public housing owing community service hours to LMHA as individual in housing or as individual as household member owing community service hours. To become eligible, the applicant must provide proof that all community service hours owed to LMHA upon move out have been fulfilled.*
- (15) *Persons convicted of the manufacture or production of methamphetamine in assisted housing are permanently prohibited from admission to housing.*
- (16) *Persons who are barred from LMHA property or properties.*
- (17) *Family member is determined to be fleeing confinement for a felony.*

LMHA retains the right, when extenuating circumstances exist, as determined solely by LMHA, to permit the admission of a family when one of the above ineligibility exists.

LMHA will not deny admission to public housing to any person because that person has been a victim of domestic violence, dating violence, stalking, or sexual assault provided that such person is otherwise qualified for such admissions.

LMHA will prohibit admission of a household to the housing program if LMHA determines that any household member is currently engaged in, or has engaged in, prohibited criminal activity during a reasonable time, referred to as a look-back period.

LMHA will complete a criminal history background check on all adult applicants. Criminal background checks must be performed in the state in which the housing is located and for states where the applicant and members of the applicant's household may have resided. As such, applicants for admission into the applicable HUD-assisted housing programs must provide a complete list of all states in which any household member has resided. Failure to accurately respond to any question during the application process is cause to deny the family admission.³

LMHA shall examine the records to determine if any household members have been involved in crimes of physical violence to persons or property or other criminal acts, drug-related criminal activity that would adversely affect the health, safety, or welfare of other residents or staff, or could cause damage to the unit or development. If the records demonstrate that an applicant has engaged in prohibited criminal activity during the look-back period, then LMHA shall propose denying the applicant housing.

B.1b Applicant Screening Process, continued

The look-back period for felonies and misdemeanors which may reasonably impact community safety, such as domestic violence or concealed weapons offenses, is THREE (3) years. The look-back period for misdemeanors which may not reasonably impact community safety is ONE (1) year. The look-back periods apply from the date of conviction, release from detention/incarceration, or completion of probation/parole, whichever is more recent, to the date of screening. Applicants with pending cases or outstanding arrest warrants may be proposed for denial of housing depending upon the nature or seriousness of the case. LMHA will afford the applicant the opportunity to participate in a hearing to discuss the case. LMHA may determine to defer a decision pending adjudication of the case.

LMHA must ensure that adverse housing decisions based upon criminal activity are supported by sufficient evidence that the individual engaged in such activity. Specifically, before LMHA denies admission to, terminates the assistance of, or evicts an individual or household on the basis of criminal activity by a household member or guest, LMHA must determine that the relevant individual engaged in such activity.¹

An arrest of an applicant for a disqualifying offense shall not, in and of itself, be a conclusive determination that the applicant engaged in disqualifying criminal activity but may be considered as a factor in the consideration of the totality of the facts and circumstances of any given incident. The arrest may, however, trigger an investigation to determine whether the applicant or tenant actually engaged in disqualifying criminal activity. As part of its investigation, LMHA may obtain the police report(s) associated with the arrest and consider the reported circumstances of the arrest. LMHA may also consider any statements made by witnesses or the applicant or tenant not included in the police report; whether criminal charges were filed; whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal; and any other evidence relevant to determining whether or not the applicant or tenant engaged in disqualifying activity.²

LMHA shall consider all of the circumstances relevant to the particular admission or eviction decision, including but not limited to: the seriousness of the offending action; the effect that eviction of the entire household would have on family members not involved in the criminal activity; and the extent to which the applicant/leaseholder has taken all reasonable steps to prevent or mitigate the criminal activity. Additionally, when specifically considering whether to deny admission or terminate assistance or tenancy for illegal drug use by a household member who is no longer engaged in such activity, LMHA may consider whether the household member is participating in or has successfully completed a drug rehabilitation program, or has otherwise been rehabilitated successfully.¹

LMHA may not base a determination that an applicant or household engaged in criminal activity warranting denial of admission, termination of assistance, or eviction on a record of arrest(s).¹

LMHA may make an adverse housing decision based on the conduct underlying an arrest if the conduct indicates that the individual is not suitable for tenancy and LMHA has sufficient evidence other than the fact of arrest that the individual engaged in the conduct. The conduct, not the arrest, is what is relevant for admissions and tenancy decisions.¹

Reliable evidence of a conviction for criminal conduct that would disqualify an individual for tenancy may also be the basis for determining that the disqualifying conduct in fact occurred. Official record of a person's conviction in a court of law is the best evidence of the person's involvement in disqualifying criminal activity.²

Only in limited and specific cases of criminal activity do HUD statutes and regulations require denial of admission or termination of assistance (and in only two cases—where someone has been convicted of producing methamphetamine in federally-assisted housing or must register as a lifetime sex offender—is someone permanently barred). In all other cases, LMHA has discretion to consider any mitigating circumstances in making admission and eviction decisions.²

Federal law requires that LMHA must provide public housing, project-based Section 8, and HCVP applicants with notification and the opportunity to dispute the accuracy and relevance of a criminal record before admission or assistance is denied on the basis of such record. Public housing, HCVP, and project-based Section 8 applicants also must be afforded the right to request an informal hearing or review after an application for housing assistance is denied.¹

When LMHA makes the decision to propose rejection of an applicant on the basis of a criminal record, LMHA must provide the applicant with a written notice stating the reason for the proposed rejection, provide the household member whose criminal history is in question a copy of the criminal record, advise of the applicant's right to respond to LMHA in writing or to request a meeting within fourteen (14) business days to dispute the proposed rejection, and advise that persons with disabilities have the right to request reasonable accommodations to participate in the informal hearing process.² If the applicant fails to request a hearing within 14 business days, then the file will be inactivated.

LMHA must offer the family the opportunity to remove the ineligible family member from the household in order to be admitted if that household member has participated in or been culpable for criminal actions that warrant rejection.³

During the admissions process, the LMHA may learn that a household member has an open warrant or a case is pending a hearing. While it may be advisable to wait until the arrest disposition, especially if the disposition is imminent, LMHA has the discretion to use the available evidence to make an eligibility determination according to the standards in this policy.²

Mitigating circumstances may cause an otherwise rejected application to be accepted under certain circumstances. Mitigating circumstances are facts relating to the applicant's negative behavior, that, when verified, indicate that the reasons for the unsuitable behavior no longer exist or are under control, and that the applicant's prospect for lease compliance is an acceptable one, justifying admission. Mitigating circumstances would overcome or outweigh information already gathered in the screening process.

B.1b

Applicant Screening Process, continued

In all instances where unfavorable information would cause an applicant family to fail to meet the screening criteria set forth above, best efforts will be made to obtain mitigating information from all available sources. Sources of information may include, but are not limited to, the applicant (by means of interview), social workers, parole officers, employers, educators, public officials, court records, drug treatment centers, clinics, physicians or police departments where warranted by particular circumstances and as allowable by law.

If, during the meeting with the Hearing Officer, the applicant asserts that there are mitigating circumstances which LMHA should consider before rendering a final decision, then the applicant shall be afforded ten (10) business days to provide such evidence.

LMHA shall consider the time, nature and extent of the applicant's conduct (including any reasonable explanation therefore) and the factors that might indicate a reasonable probability of favorable future conduct.

Mitigating factors to be considered include but are not limited to the following:

- *Evidence of successful treatment, i.e., completion of rehabilitation or verification of current rehabilitation to mitigate history of one or more family members with drug or alcohol abuse;*
- *Evidence of applicant's family's participation in social service or appropriate counseling service;*
- *Evidence of successful and sustained modification of previously disqualifying behavior;*
- *Offending individual no longer part of the household;*
- *Letter of support from a judge or court administration suggesting that the offending individual will not be placing the health and or safety of other residents at risk.*

A decision by the hearing officer in favor of LMHA, i.e., supporting that the applicant be denied housing, shall not constitute a waiver of, nor effect in any way, the rights of the applicant to a trial or judicial review in any judicial proceedings which may thereafter be brought in the matter.

Within five (5) business days of the hearing, LMHA must advise the applicant in writing of the final decision on eligibility.

An applicant's status may be changed when additional information is discovered or received prior to the applicant leasing the unit which may be cause to determine the applicant ineligible. Once all additional relevant information is received, the applicant will be returned to the waiting list or removed from the waiting list due to ineligibility.

¹Source: Notice PIH 2015-19

²Source: FAQs for Notice PIH 2015-19 / H 2015-10

³Source: Notice PIH 2012-28 / H 2012-11

B.1b

Extermination Policies

LMHA has implemented an Integrated Pest Management (IPM) program which requires a commitment from all LMHA employees, residents and extermination contractors to prevent and eradicate bed bugs, cockroaches, and other insects and vermin from all LMHA-owned/managed residential units. Cooperative efforts, now and in the future, on the part of the LMHA as well as all residents and guests will increase the likelihood of successful eradication not only with respect to bed bugs, but also regarding future infestations which pose a severe threat of contamination and are adverse to the health, safety, and welfare of LMHA residents.

All tenants must immediately notify the LMHA of the presence of bed bugs or other insects or vermin in or around his or her unit and cooperate with the LMHA extermination services. After the resident makes the report, LMHA shall schedule an appointment for an inspection of the unit and personal property of the resident.

Upon inspection, if the exterminator confirms the presence of roaches, bed bugs, insects, rodents, or animals, the reporting resident's apartment will be scheduled for extermination services. The resident will be responsible for the preparation of his or her unit for these services. Before the extermination services are started, an appointment letter with a description of all preparation requirements will be provided to the resident.

During the course of routine maintenance, inspection, or other services, if it is found that a resident has a pest or insect infestation that has not been previously reported or that has remained unresolved, then the resident will be scheduled for extermination treatment. In this case, the LMHA will notify the resident of the preparation required for the extermination and the date of the treatment.

In cases of severe infestations of either bed bugs or other varmint that pose a similar threat of severe contamination, it may be necessary for the furnishings of the resident to be removed from the premises. This will only occur when the pest control contractor advises both the LMHA and the resident in writing that no level of extermination treatment could safely remove or eliminate the pests which are infesting the resident's furniture or belongings. Notably, such furnishings must be completely removed from LMHA property; containment or dumping in dumpsters or trash bins located on property owned or operated by the LMHA will not be permitted. In such cases, LMHA strongly advises the resident to destroy the furnishings and LMHA will assist with this process upon request at no charge to the resident.

Due to the persistent nature of some insect infestations, such as bed bugs and cockroaches, LMHA will continue to have the extermination contractor inspect and treat the unit on a recurring basis until the infestation has been eliminated.

Grievance Procedures

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

LMHA's Grievance Procedures comply with 24 CFR Subpart B, §966.50-57 and are contained in the Public Housing ACOP Appendix XVI and HCVP Administrative Plan Chapter 18.

Grievances must be presented within 10 business days after the occurrence of the event giving rise to the grievance. Management has 10 business days to hold or schedule an informal settlement conference, and 10 business days after the informal settlement conference to issue a written summary to the Complainant. If the Complainant is not satisfied with the results of the informal settlement conference, the Complainant must submit a written request for a formal hearing no later than 10 business days after the date Complainant receives the summary. The request must state the reasons for the grievance and the action sought. A formal hearing shall be scheduled by the hearing officer for a within 10 business days of Complainant's request. The hearing officer shall issue a written decision, together with the reasons for the decision within 10 business days after the completion of the hearing.

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 72 active participants and has assisted 149 participants in purchasing homes since the program's inception. Ten (10) participants became new homeowners in 2016 and six (6) HCVHOP participants went over-income and off assistance. LMHA has a goal of seven (7) new homeowners in 2017.

Community Service and Self Sufficiency Programs

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

LMHA follows HUD guidance in its implementation of the Community Service and Self Sufficiency Requirements (CSSR). LMHA's CSSR policy is included in the ACOP as Appendix X. LMHA proposes changes to the CSSR policy this year to clarify eligible community service and self-sufficiency activities as described in Notice PIH 2015-12.

The following clarifications will be added to the CSSR policy:

Self-Sufficiency: Eligible self-sufficiency activities include, but are not limited to:

- A. Job readiness or job training;*
- B. Training programs through local One-Stop Career Centers, Workforce Investment Boards (local entities administered through the U.S. Department of Labor) or other training providers;*
- C. Higher education (junior college or college);*
- D. GED classes;*
- E. Apprenticeships (formal or informal);*
- F. Substance abuse or mental health counseling;*
- G. Reading, financial and/or computer literacy classes;*
- H. English as a second language and/or English proficiency classes;*
- I. Budgeting and credit counseling; and,*
- J. Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF)*

B.1b	<p>The following clarifications will be added to the CSSR policy (continued):</p> <p>Community Services: <i>Eligible community service activities include, but are not limited to, work at:</i></p> <ul style="list-style-type: none"> A. <i>Local public or nonprofit institutions, such as schools, Head Start Programs, before-or after-school programs, childcare centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult daycare programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing);</i> B. <i>Nonprofit organizations serving PHA residents or their children, such as: Boy or Girl Scouts, Boys or Girls Club, 4-H Clubs, Police Activities League (PAL), organized children's recreation, mentoring, or education programs, Big Brothers or Big Sisters, Garden Centers, community clean-up programs, beautification programs;</i> C. <i>Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels;</i> D. <i>Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods or performing arts;</i> E. <i>PHA housing to improve grounds or provide gardens (so long as such work does not alter the PHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board; and,</i> F. <i>Care for the children of other residents so parents may volunteer.</i> G. <i>LMHA accepts community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work.</i> <p><i>LMHA offers the Family Self-Sufficiency Program, a voluntary program which provides one-on-one case management to participants wishing to increase their earned income. Participants have the opportunity to earn an interest-building escrow account, just by working and paying their rent. Any increases in rent due to an increase in earned income during participation in the program result in a credit to the escrow account. Successful graduates are eligible to be awarded the total amount of their escrow balances.</i></p> <p><i>The LMHA FSS Program will strive to promote and encourage the coordination of public and private resources to enable families to achieve independence and self sufficiency, the incentive behind this promotion being the establishment of an FSS escrow account.</i></p> <p><i>FSS Participants are referred to various sites in the community if they should have need for Adult Basic Education or GED preparation. The Lorain County Joint Vocational School (JVS) offers job placement and counseling services, plus many vocational studies to help students to pursue non-traditional careers, remedial training, and concentrated training in a variety of office positions. JVS provides financial assistance through Pell grants, OIG assistance, and Single Parent Financial Assistance Program. Lorain County Community College (LCCC) offers a continuing education program through the Partnership Program, on-site childcare, financial aid, and groups designated to assist students in specific fields educationally and culturally.</i></p> <p><i>Through a grant from HUD, LMHA is able to provide enhanced direct one-on-one services utilizing the service coordination grant. Ohio Department of Jobs and Family Services assists TANF recipients in pursuing higher education, provide grant and loan information, career counseling and GED classes. LMHA has partnered with Ohio Means Jobs Lorain County to provide a one-stop location for self-help seminars, training programs, a computer lab and information about employment opportunities.</i></p> <p><i>The FSS Program Coordinating Committee is composed of representatives from Lorain County whose mission is to assist in the proper implementation of the program. Persons and agencies involved are Ohio Means Jobs Lorain County, Habitat for Humanity, El Centro, Horizon Day Care, Lorain County Community College, Northwest Savings Bank, and LMHA Resident.</i></p>
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B.1b	<p><i>Following are descriptions of services and amenities offered to assisted families by LMHA:</i></p> <ul style="list-style-type: none"> ○ <i>Family Self Sufficiency (FSS) programming for LMHA public housing and HCVP residents</i> ○ <i>HCVP Home Ownership Option Program</i> ○ <i>Section 3 outreach to assisted families and those in the surrounding neighborhood</i> ○ <i>Supportive Service Coordinator on staff to connect the residents with social service agencies to address their needs</i> ○ <i>Supportive 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</i> ○ <i>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</i> ○ <i>Green Thumb program to teach about and encourage planting of flower, perennial and urban vegetable gardens</i> ○ <i>Computer labs and internet access established in several public housing properties for resident use</i> ○ <i>Resident Assistance Watch programs to engage public housing residents in monitoring their properties. Residents can earn community service hours while participating.</i> ○ <i>Volunteer Income Tax Assistance (VITA) assists over 1,800 families in filing income tax returns and provides information about EITC program, Lorain County Free Tax Coalition has processed over 2 million dollars in refunds</i> ○ <i>Project Warm, in conjunction with Lorain County Community Action Agency, provides new winter coats to more than 400 low-income children</i> ○ <i>Presentations provided by various speakers to discuss Medicare, Medicaid, the Affordable Care Act, Smoking Cessation, housekeeping, budgeting, home health care, medical equipment and supplies, home delivered meal programs, home delivered medication services, etc.</i> ○ <i>LMHA is a Certified Credit Counseling agency</i> ○ <i>LMHA conducts Homebuyer's Education Classes which fulfills HUD Approved Pre-Purchase Housing Counseling</i> ○ <i>Food pantry is established at Westview Terrace</i> ○ <i>Boys and Girls clubs are established in 3 properties</i> ○ <i>Junior Olympics</i> ○ <i>Domestic Violence Awareness task force in collaboration with the Genesis House</i> ○ <i>LMHA served as a Mary Lee Tucker application center to provide clothing for families</i> ○ <i>Lorain County Health and Dentistry operates a medical and dental center in Wilkes Villa for residents and the general public</i> ○ <i>Horizons Day Care facility in Wilkes Villa provides day care to residents and employment opportunities. As of December 31, 2016 there were 73 children served by/enrolled at Horizons.</i> ○ <i>Horizons oversees the Summer Food Program at Wilkes Villa serving breakfast and lunch to several hundred children daily</i> ○ <i>The USDA Summer Food Program provides children with breakfast and lunch at Wilkes Villa, Leavitt Homes, Westview Terrace and Southside Gardens</i> ○ <i>Offer Financial Assistance for Education to assist residents to improve work skills and achieve individual and educational goals</i> ○ <i>LMHA hosts the annual Fatherhood Initiative event at Southside Gardens, which encourages bonding between fathers (or father figures) and children while also providing available resource information from 25 different community organizations who also attended the event</i> ○ <i>Publishes a quarterly newspaper to keep public housing residents informed on available housing and community programs</i> ○ <i>Binders with community resource information are accessible to public housing residents through each development's manager's office</i> ○ <i>Through collaboration with the Lorain County Bridges Out of Poverty, and busing provided by Horizon Day Care, LMHA was able to provide available community resources information such as HEAP, Safe Summer Youth Program, and literacy initiatives for the children and families from Wilkes Villa, Leavitt Homes, Westview Terrace, and throughout the community</i> ○ <i>Available community resource information was provided to residents at public housing high-rises through Farmer's Market and Resource Fairs</i>
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B.1b

Safety and Crime Prevention

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

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

i. Due to the incidence of drug-related and criminal activity in the areas surrounding, adjacent to, or within some of LMHA’s properties, LMHA sees a need for measures to ensure the safety of its residents. Though crime rates are lower in LMHA properties when compared to any comparable geographical size or population in which they are located, residents might be fearful for the safety of their families. Additionally, some people on the waiting list are reluctant to move into one or more developments due to perceived and/or actual levels of minor and/or drug-related crime. Statistics from the Lorain Police Department show that of all the police reports and criminal violations in the city of Lorain, 9% of the 8381 cases occurred among the 948 housing units in Lorain. Statistics from the Elyria Police Department show that of all the police reports and criminal violations in the city of Elyria, 2% of the 6177 cases occurred among the 452 housing units in Elyria.

ii. LMHA contracts with off-duty police officers to provide above-baseline services by patrolling various properties. *The Lorain Police Department (LPD) and LMHA have implemented a Community Policing Team at Leavitt Homes, Westview Terrace and Southside Gardens. LPD believes that they best serve when they understand the needs and expectations of the people, develop effective partnerships, and ultimately provide comprehensive service by building ties and working closely with the community. A CPT substation was established at 2139 West 24th Street to improve accessibility to residents of the Lorain public housing family developments.*

Supplemental services are provided by private security firms to deter, document, and report undesirable activities. *The firms conduct mobile patrols and interior checks of high rises.* LMHA resident volunteers are trained to participate in the Resident Assistance Watch (RAW) program where they provide an internal neighborhood watch program within the high rise properties. LMHA’s Criminal Investigator works with law enforcement agencies and the city-wide neighborhood watch programs. LMHA has contracted a police officer with a K-9 Drug Dog to perform random patrols at LMHA owned and managed properties. This patrol is performed weekly or as needed.

iii. LMHA’s Criminal Investigator meets with the local police departments and the county sheriff’s department at least once per week to discuss results of patrols in LMHA properties. Lorain Police Department automatically notifies the Investigator when any report is generated at any LMHA address in the City of Lorain. The Investigator also coordinates activities with the Marshall Service, local narcotic bureaus, and detective bureaus. The Investigator and Executive Director meet annually with the Chiefs of Police and Patrol Liaison Officers to discuss crime trends, ongoing resident problems, and target areas for drugs and criminal activity.

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

LMHA has adopted an Emergency VAWA Transfer Plan. LMHA is a member of the Domestic Violence Awareness Task Force.

LMHA collaborates with local community agencies providing services and programs related to domestic violence, dating violence, sexual assault, or stalking to ensure that current information and all informational community programs are available to applicants, residents and staff. The following local organizations offer assistance to victims:

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

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

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

*Lorain County Board of Mental Health
1173 North Ridge Road, East
Lorain, OH 44055
440.233.2020
24/7 Emergency/Crisis Hotline: 800.888.6161*

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

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

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

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

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

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

B.1b

Pet Policy

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

The LMHA Pet Policy is Appendix XV in the ACOP.

LMHA proposes to amend the Assistance Animal Lease Addendum by requiring tenants to provide contact information for the individual who will retrieve and care for the Assistance Animal in case the tenant is unable to do so (e.g., hospitalization, incapacitation or death). The Assistance Animal Addendum was also amended to include the Ohio Revised Code definitions of dangerous, vicious and nuisance animals.

Asset Management

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

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

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

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

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

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

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

The Authority shall continue its implementation and utilization of technologies to improve the productivity of staff, such as new software to gain insights from housing data, conference calling to reduce employee travel to meetings, and online Paychex login for employees to gain access to their human resource data.

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

Substantial Deviation

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

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

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

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

Significant Amendment/Modification

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

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

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

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

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

Deconcentration Policy of Lorain Metropolitan Housing Authority

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

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

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

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

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

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

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

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

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

Revised July 2015; April 1, 2016; July 2016

Board resolution 8402-99; 6-16-99

Deconcentration Statistics

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

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

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

In calendar year 2016, the EIR range was \$7962 to \$10,772 with the average family income PHA-wide of \$9367.

- o Leavitt Homes: (\$1104 below EIR). In 2016, there were 56 households (29%) with zero income and 81 adults with Community Service requirements. In 2015, Leavitt's average income was \$396 above the low end of EIR and 30 families (22%) with zero income.
- o Westgate Apartments (\$3894 below EIR) has 12 apartments, 11 are occupied as of the date of the report. Four households have zero income, 7 have an average income of \$4068, & 5 adults have Community Service requirements. In 2015, the average household income was \$4270; in 2014, it was \$8167, within EIR. In 2013, it was \$2324 below EIR. With only 12 units, the averages are easily skewed by only a few families.

In 2014, 92% of the new admissions to public housing were Extremely Low Income (ELI)

In 2015, 97% of the new admissions to public housing were Extremely Low Income (ELI).

In 2016, 93% of the new admissions to public housing were Extremely Low Income (ELI). Nineteen percent of the PH households have zero income.

To address deconcentration issues, LMHA has chosen a strategy of working with current households to raise their incomes rather than adjusting admissions policies or criteria. The Striving Toward Achieving Real Success (STARS) program targeted the properties with high percentages of zero-income households and which have an average household income below 85% of the PHA average. With more than 90% of the public housing households being ELI, 19% having zero income, and none of the public housing properties being above the high end of the EIR, there are no opportunities to transfer higher income residents to lower income properties.

B.2 New Activities.

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

Y N

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

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

NON-SMOKING POLICIES

LMHA is implementing non-smoking policies at all of its owned and managed properties. See the Smoke Free Policy in section B.1b.

Mixed Finance Modernization or Development

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

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

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

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

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

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

The units approved for disposition are:

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

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

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

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

B.2b

DEVELOPMENT ACTIVITIES:

Master Plans for Wilkes Villa and Southside Gardens Redevelopment

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

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

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

Submission of Development Proposals for Wilkes Villa in 2013

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

Submission of Development Proposals for Southside Gardens in 2013

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

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

Submission of future Development Proposals

In fiscal year 2018, LMHA *may* submit to HUD Development Proposals for the redevelopment of the remainder of Wilkes Villa and Southside Gardens in accordance with the Master Plans for both properties. The Development proposal for Wilkes Villa will rely heavily upon the approval of the acquisition proposals for the vacant parcels described below. The redevelopment of the properties may need to be completed in phases based upon the availability of funding.

Submission of Site Acquisition Proposals in 2014

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

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

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

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

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

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

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

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

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

LMHA *may consider* applying for Low Income Housing Tax Credits through the Ohio Housing Finance Agency for the 2018 Qualified Allocation Plan (QAP) for redevelopment of Wilkes Villa (OH012-003) and/or Southside Gardens (OH012-013/014)

B.2b

Wilkes Villa OH012-003 units designated for demolition (continued)

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

B.2b

Wilkes Villa OH012-003 units designated for demolition (continued)

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

B.2b

Wilkes Villa OH012-003 units designated for demolition (continued)

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

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

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

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

B.2b

Southside Gardens OH012-014; 28 buildings, 58 units

Construction Date: 8/31/1973

Units designated for demolition

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

B.2b Southside Gardens OH012-14 units designated for demolition (continued)					
Bldg nos.	PIC Bldg No.	Address		Building Type	No. BR
87	014020	1529 E. 29TH ST.	LORAIN	Row or Townhouse	2
	014020	1531 E. 29TH ST.	LORAIN	Row or Townhouse	2
	014020	1533 E. 29TH ST.	LORAIN	Row or Townhouse	3
	014020	1535 E. 29TH ST.	LORAIN	Row or Townhouse	3
88	014021	1537 E. 29TH ST.	LORAIN	Single Family/Detached	5
89	014022	1541 E. 29TH ST.	LORAIN	Single Family/Detached	6
90	014023	1543 E. 29TH ST.	LORAIN	Single Family/Detached	6
91	014024	1545 E. 29TH ST.	LORAIN	Single Family/Detached	5
92	014025	1547 E. 29TH ST.	LORAIN	Row or Townhouse	3
	014025	1549 E. 29TH ST.	LORAIN	Row or Townhouse	3
	014025	1551 E. 29TH ST.	LORAIN	Row or Townhouse	2
	014025	1553 E. 29TH ST.	LORAIN	Row or Townhouse	2
94	014027	1647 E. 29TH ST.	LORAIN	Single Family/Detached	5
95	014028	1649 E. 29TH ST.	LORAIN	Single Family/Detached	6
96	014029	1651 E. 29TH ST.	LORAIN	Single Family/Detached	6
97	014030	1653 E. 29TH ST.	LORAIN	Single Family/Detached	5
98	014031	1655 E. 29TH ST.	LORAIN	Row or Townhouse	3
	014031	1657 E. 29TH ST.	LORAIN	Row or Townhouse	3
	014031	1659 E. 29TH ST.	LORAIN	Row or Townhouse	2
	014031	1661 E. 29TH ST.	LORAIN	Row or Townhouse	2

Demolition/Disposition Timetable
The Demolition Applications for Wilkes Villa and Southside Gardens will be submitted to SAC in Fiscal Year **2018**. The timetable for actual demolition will depend upon the approval of the demolition application; the approval of development proposals; the availability of funding; and approval of application for Mixed Finance Development, if necessary. Demolition may occur in phases based upon funding.

B.3 Civil Rights Certification.
Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B.4 Most Recent Fiscal Year Audit.
(a) Were there any findings in the most recent FY Audit?
Y N

(b) If yes, please describe:

<p>B.5</p>	<p>Progress Report. Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>LMHA’s 5-year Action Plan, including CFP 2016, is comprised of projects and activities from the Physical Needs Assessment (GPNA). Input has also been sought from public housing residents, the Resident Advisory Board (RAB), the public and LMHA employees. All the work listed in the 5-year Action Plan totals nearly \$80 million.</p> <p>Since LMHA’s annual allotment of capital funds totals just over \$2 million, it is not fiscally possible to complete all high-priority capital improvement projects at all properties, so the priorities must be refined even further. This ensures that projects which impact health and safety issues, integrity of critical building systems, and long-term viability of structures are performed first. These decisions are based not only on the GPNA but also upon results of UPCS inspections and input from COCC administrators, site management, site staff, resident surveys and public meetings. Use of Operating Reserves in accordance with HUD regulations had been part of the capital improvement process; however, such use is not longer permitted. If HUD ends this restriction, LMHA may consider the use of operating reserves for capital improvements if necessary and available.</p> <p><i>LMHA is intent upon implementing its Master Plans for Redevelopment of Southside Gardens and Wilkes Villa. It is likely to take years to overcome the challenge of financing multi-million dollar projects. It is necessary to maintain the properties to ensure they remain safe, sanitary and decent. In calendar years 2015 and 2016, LMHA invested over \$1 million in interior improvements, basement repairs, and water infiltration control at Southside Gardens. This work will sustain the viability of the property for a number of years as financing is sought and the project is approved for construction.</i></p> <p><i>In calendar year 2016, LMHA invested \$3,064,510 in capital improvement projects agency wide (CFP2013 - \$375,562; CFP2014 - \$1,264,464; CFP2015 - \$1,318,512; CFP2016 - \$105,972</i></p> <p>The Housing Authority has also determined to address the accessible needs of the community by implementing visitability and universal design concepts in its projects. LMHA has prudently and assertively worked towards attaining its Section 504 goals.</p> <p>LMHA will continually review its AMP structures to best serve the Housing Authority’s efficiencies of operations.</p> <p>The Authority shall continue its implementation and utilization of technologies to improve the productivity of staff, such as new software to gain insights from housing data, conference calling to reduce employee travel to meetings, and online Paychex login for employees to gain access to their human resource data.</p> <p>Many of LMHA’s goals are not just capital improvements listed in the PHA 5-Year Action Plan. LMHA established many goals and programs, often in collaboration with other social service agencies, governmental authorities, non-profit groups, and private entities, to enhance and improve the living environment and self sufficiency of residents. An impressive collection of goals and success stories is posted online at http://www.lmha.org/about-lmha/annual-reports/. The reader is encouraged to review the successes of the Lorain Metropolitan Housing Authority that extend beyond the provision of quality affordable housing.</p> <p>For a listing of completed capital fund projects and costs, go to http://www.lmha.org/about-lmha/annual-reports/. Click on documents labeled “50075.1” for a particular year of interest.</p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>B.7</p>	<p>Certification by State or Local Officials. Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C.</p>	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p>C.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p><i>See HUD Form 50075.2 approved by HUD on November 16, 2016.</i></p>

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**RESIDENT ADVISORY BOARD (RAB)
COMMENTS ON THE
LORAIN METROPOLITAN HOUSING AUTHORITY
2017 (FY18) ANNUAL PLAN, FIVE-YEAR PLAN,
and 5-YEAR ACTION PLAN**

The Lorain Metropolitan Housing Authority (LMHA) met with the Resident Advisory Board (RAB) on **January 18, 2017** to discuss the proposed changes to the 2017 Annual Plan, Five-Year Plan, and Five-Year Action Plan. Nineteen RAB members representing Public Housing, Housing Choice Voucher Program, and Section 8 New Construction participated in the meeting. LMHA was represented by 8 employees.

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LMHA sent drafts of all the documents to the RAB members earlier in the month so they had an opportunity to review them prior to the meeting. LMHA reviewed each of the documents and encouraged meeting participants to ask questions or make comments at any time throughout the discussion. The summary of questions and comments and LMHA's response and actions follow.

Q: Do you charge people to cut grass?

A: If a resident lives in a unit that the lease requires the grass be cut by the resident, such as Oberlin Homes or Scattered Sites, they are charged the cost to mow if they do not do so.

Q: Can housing be transferred out of state?

A: Under the HCV program, a voucher is portable. Public housing is not.

Q: [Transfer Policy] If I'm in a 4 bedroom but need a 2, do I have to wait until you need a 4 bedroom for someone else to transfer down to a 2 if I want to now?

A: No, bring it to your Manager's attention. They probably already have you on the transfer list. The transfer list is now centralized in the Admissions Department.

Q: [Admin Plan Review] Don't tenants have to throw their couches out if they have bedbugs?

A: LMHA is responsible for paying for extermination for public housing residents. The resident is responsible for preparing for extermination. The contractor is responsible for exterminating. The contractor may strongly advise the resident that a piece of furniture be removed if it is completely infested and will be extremely difficult to treat. LMHA maintenance staff removes the furniture so that precautions are taken to avoid transfers of infestation. In the voucher program, the responsibility for extermination is determined by the lease agreement between the landlord and the tenant. LMHA updated its Administrative Policy to clarify this and to indicate clear circumstances when the landlord must be responsible for extermination.

Q: [Applicant Screening] If someone is already a tenant and commits a crime and is on probation, can they lose their housing?

A: Yes, it is possible. But every situation is different. For drug-related criminal activity or if someone is convicted of a felony, a Termination of Lease would be issued.

Q: Are the Resident Services activities available to HCVP participants?

A: Yes. Some (but not all) of the services and programs we provide are available to participants, such as FSS, tax programs, Boys and Girls Club, Lorain County Health and Dentistry, daycare, food bank, Mary Lee Tucker. Anything that is open to the public is also available to HCVP participants.

Q: [Website review] Where can you see your status on the Section 8 waiting list?

A: We do not have that available on the website. We hope to enhance the tenant portal in the future, but it is not likely that we would have an applicant portal available on the website. So, at this time, an applicant would have to speak with the Admissions department.

Written documents were presented by two RAB members. One member recommended that LMHA buy a used shuttle bus to take residents on shopping trips. The RAB member was reminded that LMHA contracts with Lorain County Transit to provide such services on a regular schedule. Resident Services will ensure the schedule is provided to her.

Another RAB member who is an HCVP participant sent a letter advising that she could not attend but would carefully review the documents and submit comments to us. LMHA replied that she will have until the end of the public review period and public hearing on March 15, 2017 to submit comments.

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LMHA reviewed the 5-Year Action Plan for capital improvements and form 50075.1 for the 2017 Capital Fund Program. There were no concerns presented. All comments were supportive.