

<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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## DRAFT OF LMHA'S 2021 ANNUAL PLAN FEBRUARY 2021

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

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

**Definitions.**

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

A.	PHA Information.
A.1	<p> <b>PHA Name:</b> <u>LORAIN METROPOLITAN HOUSING AUTHORITY</u>      <b>PHA Code:</b> <u>OH012</u>  <b>PHA Type:</b>   <input type="checkbox"/> Small   <input checked="" type="checkbox"/> High Performer  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>07/2021</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>1438</u>    <b>Number of Housing Choice Vouchers (HCVs)</b> <u>3141</u>  <b>Total Combined</b> <u>4579</u>  <b>PHA Plan Submission Type:</b>   <input checked="" type="checkbox"/> Annual Submission                      <input type="checkbox"/> Revised Annual Submission </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> LMHA posts the Annual PHA plan, the Five-Year Plan, and the Capital Fund Program 5-Year Action Plan elements on its website at <a href="http://www.lmha.org">www.lmha.org</a>. Plans are also available at the LMHA Main Office, 1600 Kansas Avenue, Lorain, OH 44052 and at all administrative and property management offices: </p> <ul style="list-style-type: none"> <li>o LMHA (formerly LMHA's procurement office) 1604 Kansas Avenue, Lorain, OH 44052</li> <li>o Leavitt Homes 2153 Lorain Drive, Lorain, OH 44052</li> <li>o Kennedy Plaza 1730 Broadway, Lorain, OH 44052</li> <li>o Lakeview Plaza 310 W. 7<sup>th</sup> Street, Lorain, OH 44052</li> <li>o Southside Gardens 3010 Vine Ave., Lorain, OH 44055</li> <li>o Albright Terrace 129 Milan Ave., Amherst, OH 44001</li> <li>o John Frederick Oberlin Homes 138 South Main St., Oberlin, OH 44074</li> <li>o Wilkes Villa 104 Loudon Court, Elyria, OH 44035</li> <li>o Riverview Plaza 310 East Ave., Elyria, OH 44035</li> <li>o Harr Plaza 15 Chestnut Street, Elyria, OH 44035</li> <li>o International Plaza 1825 Homewood Drive, Lorain, OH 44055</li> </ul> <p> LMHA provides the Plans to each of its resident councils. </p> <p> To obtain additional information on the policies contained in the Annual Plan, visit <a href="http://www.lmha.org/about-lmha/">http://www.lmha.org/about-lmha/</a> and select either "Annual Reports and Audits" or "LMHA Policies". For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750. </p>

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

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

**B. Annual Plan Elements**

**B.1 Revision of PHA Plan Elements.**

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

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

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

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

B.1b

**Statement of Housing Needs and Strategy for Addressing Housing Needs**

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

At the end of calendar year 2020, nearly 80% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 89% of public housing residents, 92% of multifamily residents, and 82% of participants in HCVP are ELI. For comparison, approximately 15% of families in Lorain County are ELI<sup>1</sup>. Nearly 21% of the public housing households (290) have zero annual income. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County.

Approximately 21% of LMHA applicants for PH, Multifamily, and HCVP are elderly families or families with disabilities. In public housing, if an accessible unit is vacant, that unit will be offered to the first family that is in need of the features of the unit, even if the family is not at the top of the waiting list. If an applicant or current family does not need the accessibility, LMHA contacts agencies who serve persons with disabilities to advise them of the availability of such units.

Though none of LMHA's public housing developments are designated for persons who are elderly or have disabilities, LMHA manages two Multifamily Project-Based Section 8 properties (Harr and International Plazas) with 100 units each designated for elderly or persons with disabilities (41% are elderly, 90% are persons with a disability). In LMHA's public housing, 36% of the heads of households are persons with a disability, and 14% of the heads of household are elderly.

LMHA processed more than 450 requests for Reasonable Accommodations annually for all housing programs in calendar year 2020.

LMHA administers 175 vouchers for persons who are Non-Elderly Disabled (NED), 117 Veterans Affairs Supportive Housing (VASH) vouchers, and are housing 8 persons via the Foster Youth to Independence (FYI) initiative. LMHA had 15 referrals in 2020.

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

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

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

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

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

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

<p><b>B.1b</b></p>	<p><b>The City of Elyria (located at: NOTE the City of Elyria updated its website (<a href="https://www.cityofelyria.org/">https://www.cityofelyria.org/</a>) and does not yet have the 2020-2024 5-Year Consolidated Plan posted online as of February 16, 2021; the link will be added in the final version of this document)</b> identifies Housing, Homelessness and Other Special Needs as priorities. Goals and strategies were identified by the City to support these priorities. LMHA's Annual and Capital Fund Program 5-Year Action Plans show consistency with the City's goals and objectives as follows:</p> <p><i>Housing Priority: There is a need to maintain, expand and improve affordable housing.</i></p> <p>Goal/Strategy:  Housing Rehabilitation: Rehabilitate the existing owner-occupied and rental housing stock in the City. LMHA is proposing to rehabilitate units as needed, including, but not limited to the following: bath/plumbing, appliances, furnace replacement, electrical, light replacement, doors, windows and radon testing.</p> <p>Housing Construction: Increase the supply of affordable, decent, safe, accessible and sanitary housing through new construction. LMHA is proposing to construct new housing units at Wilkes Villa which will include multiple bedroom units. The design will also integrate full mobile accessibility for approximately 10% of the units and for all units to be visitable.</p> <p>Home Ownership: Assist low- and moderate-income households to become home owners through credit counseling, housing counseling and financial incentives. LMHA provides homeowner counseling services. The Authority maintains a Housing Choice Voucher Program. LMHA also continues to work with current households to raise their incomes.</p> <p><i>Homeless Priority: There is a need for housing opportunities and services for homeless persons and persons at-risk of becoming homeless.</i></p> <p>Goal/Strategy:  Housing Support: Support local agencies efforts to provide emergency shelter, transitional housing and permanent supportive housing. LMHA provides affordable housing to families/individuals at the extremely low income range. Without support, many of these families would lack housing. LMHA intends to work with community partners to identify specific target populations to be served through project-based vouchers. The Authority may also issue project based vouchers to developer(s) who assist homeless persons or who have more disabling conditions that complicate a person's ability to find and maintain housing.</p> <p>Housing Development: Support the development of housing for the homeless and disabled by nonprofit organizations and governmental agencies. LMHA provides affordable housing to those at risk for becoming homeless. LMHA is proposing to increase the number of units that are handicap accessible with a goal of establishing at least 72 mobility accessible public housing units. Further, LMHA has exceeded its goal of having 2%, or 29, units for persons with sensory impairments. LMHA has 396 (28%) of its public housing units accessible for persons with sensory (hearing) impairments.</p> <p><i>Other Special Needs Priority: There is a need for housing opportunities, services, and facilities for persons with special needs.</i></p> <p>Goal/Strategy:  LMHA is proposing to increase the number of units to those with special needs in the 5-year plan.  Housing: Increase the supply of decent, safe, accessible, and sanitary housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation, new construction, and reasonable accommodation. LMHA will continue its efforts to rehabilitate construct and provide reasonable accommodations, as provided throughout the plan.</p> <p><i>Public Service Priority: There is a need to support social services, programs, and facilities for the elderly, persons with disabilities, the homeless and persons with other special needs.</i></p> <p>Goal/Strategy:  Public Service: Support programs for the elderly and disabled, social service programs, emergency shelter, transitional housing, and permanent supportive housing. LMHA will enhance the provision of services to residents, applicants and the public.</p> <p><b>LMHA's housing strategies are consistent with the City</b> of Lorain's Consolidated Plan (located at <a href="https://www.cityoflorain.org/DocumentCenter/View/3132/Five-Year-Consolidated-Plan-20202021-20242025-and-Annual-Action-Plan-Program-Year-2020-2021">https://www.cityoflorain.org/DocumentCenter/View/3132/Five-Year-Consolidated-Plan-20202021-20242025-and-Annual-Action-Plan-Program-Year-2020-2021</a>) and Fair Housing Impediment Study because of the need to assist low- and moderate- income persons, prevent or eliminate slums or blight, and address community development needs that pose a serious and immediate threat to the health or welfare of the community, etc.</p> <p><b>Lorain County</b> has noted that LMHA's housing strategies continue to preserve its affordable housing stock and meet the State of Ohio goal of providing funding for a flexible, community wide approach to the improvement and provision of affordable housing for low- and moderate-income persons, and to help develop local administrative capacity. LMHA's Annual Plan specifically addresses goals 2,3,4,5,7,8 and 10 found in the State Consolidated Plan (located at <a href="https://development.ohio.gov/files/cs/Approved_PY2020_AnnualActionPlan.pdf">https://development.ohio.gov/files/cs/Approved_PY2020_AnnualActionPlan.pdf</a>) and will continue to move LMHA forward in the following areas.</p> <ul style="list-style-type: none"> <li>• Improve the quality of existing affordable housing</li> <li>• Provide enhanced services for current residents</li> <li>• Promote deconcentration</li> <li>• Improve and implement safety and security measures</li> <li>• Implement and improve green features and initiatives</li> </ul>
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**B.1b** LMHA's mission and specialty is the provision of safe, decent, affordable housing for persons of low-income in Lorain County. Lorain's primary housing problem is affordability, and LMHA's housing programs are tailored to that problem for general populations, elderly persons, and persons with disabilities. None of LMHA's owned-and-managed properties are substandard, as defined by HUD. LMHA is working towards implementing its Master Plans to redevelop Southside Gardens (Lorain) and Wilkes Villa (Elyria) which, upon completion, would replace functionally obsolete structures with new, quality affordable housing that is attainable to those with low income. LMHA has improved its coordination and has frequent communications with the City of Lorain in regards to proposed projects and LMHA policies. LMHA provides self-sufficiency programming for its public housing residents and HCVP participants.

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

<b>Housing Needs of Housing Choice Voucher Program (HCVP) APPLICANTS ACTIVE on Waiting List<sup>3</sup></b>			Statistics for Lorain County Households <sup>1,2</sup>
<b>NOTE: LMHA's HCVP is currently CLOSED.</b>	# of Families	% of Total Families	
<b>Totals as of February 6, 2021</b>	20	100%	118,594
Extremely low income (<=30% AMI)	13	65.0%	10.2%
Very low income (>30% but <=50%AMI)	7	35.0%	9.7%
Low Income (>50% but <80% AMI)	0	0%	14.0%
Families with children <sup>4</sup>	15	75.0%	32.77%
Elderly families	0	0%	27.42%
Families with Disabilities	0	0%	15.3
Female HOH	18	90.0%	-
Hispanic	8	40.0%	9.52%
White	10	50.0%	85.24%
Black/African American	7	35.0%	8.42%
American Indian/Alaska Native	0	0%	0.31%
Asian	0	0%	1.01%
Native Hawaiian/other Pacific Islander	1	5.0%	0.04%
Multi-racial	1	5.0%	3.77%
Not reported	1	5.0%	-

<b>Housing Needs of PUBLIC HOUSING (PH) APPLICANTS ACTIVE on Waiting List<sup>3</sup></b>			Statistics for Lorain County Households <sup>1,2</sup>
<b>NOTE: LMHA is currently accepting PH applications for bedroom sizes 2, 3, 4, 5, and 6. The 1 br waitlist is closed.</b>	# of Families	% of Total Families	
<b>Totals as of February 6, 2021</b>	169	100%	118,594
Extremely low income (<=30% AMI)	131	77.5%	10.2%
Very low income (>30% but <=50%AMI)	29	17.2%	9.7%
Low Income (>50% but <80% AMI)	6	3.6%	14.0%
Families with children <sup>4</sup>	109	64.5%	32.77%
Elderly families	8	4.7	27.42%
Families with Disabilities	24	14.2%	15.3
Female HOH	144	85.2%	-
Hispanic	50	29.6%	9.52%
White	97	57.4%	85.24%
Black/African American	58	34.3%	8.42%
American Indian/Alaska Native	2	1.2%	0.31%
Asian	0	0.0%	1.01%
Native Hawaiian/other Pacific Islander	1	0.6%	0.04%
Multi-racial	3	1.8%	3.77%
Not Reported	8	4.7%	-

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

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

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

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

B.1b

Housing Needs of MULTIFAMILY HOUSING (Harr/International Plazas) APPLICANTS ACTIVE on Waiting List <sup>3</sup>			Statistics for Lorain County Households <sup>1,2</sup>
NOTE: LMHA Multifamily Housing waiting list is OPEN.	# of Families	% of Total Families	
<b>Totals as of February 6, 2021</b>	59	100%	118,594
Extremely low income (<=30% AMI)	54	91.5%	10.2%
Very low income (>30% but <=50%AMI)	4	6.8%	9.7%
Low Income (>50% but <80% AMI)	1	1.7%	14.0%
Elderly families	14	23.7%	27.42%
Families with Disabilities	29	49.2%	15.3
Female HOH	49	83.1%	-
Hispanic	15	25.4%	9.52%
White	38	64.4%	85.24%
Black/African American	15	25.4%	8.42%
American Indian/Alaska Native	2	3.4%	0.31%
Asian	0	0%	1.01%
Native Hawaiian/other Pacific Islander	0	0%	0.04%
Multi-racial	2	3.4%	3.77%
Not reported	2	3.4%	-

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

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

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

B.1b

### Housing statistics of current LMHA families

<b>Total HCVP Families (2/06/2021)</b>	3062	100.0%
Disabled HOH	1202	39.3%
Elderly HOH	550	18.0%
Hispanic	841	27.5%
Female HOH	2576	84.1%
Male HOH	486	15.9%
White	1639	53.5%
Black/African American	1317	43.0%
American Indian/Alaska Native	23	0.8%
Native Hawaiian/Other Pacific Islander	27	0.9%
Asian	0	0%
Multi-Racial	56	1.8%
Extremely low income (ELI)	2516	82.2%
Very low income (VLI)	424	13.8%
Low Income (LI)	64	2.1%
High Income	10	0.3%
Income level undefined	48	1.6%
Average Household Income	\$12,401.73	

<b>Total Public Housing Families (2/06/2021)</b>	1405	100.0%
Disabled HOH	505	35.9%
Elderly HOH	193	13.7%
Hispanic	399	28.4%
Female HOH	1020	72.6%
Male HOH	385	27.4%
White	813	57.9%
Black/African American	534	38.0%
American Indian/Alaska Native	14	1.0%
Native Hawaiian/Other Pacific Islander	10	0.7%
Asian	1	0.1%
Multi-Racial	33	2.3%
Extremely low income (ELI)	1256	89.4%
Very low income (VLI)	112	8.0%
Low Income (LI)	27	1.9%
High Income	10	0.7%
Average Household Income	\$9426.75	

B.1b

<b>Total Multifamily Housing Families (Harr and International Plazas) (2/06/2021)</b>		
Disabled HOH	174	90.2%
Elderly HOH	79	40.9%
Hispanic	39	20.2%
Female HOH	94	48.7%
Male HOH	99	51.3%
White	135	69.9%
Black/African American	52	26.9%
American Indian/Alaska Native	1	0.5%
Native Hawaiian/Other Pacific Islander	2	1.0%
Asian	0	0%
Multi-Racial	2	1.0%
Not Reported	1	0.5%
Extremely low income (ELI)	180	93.3%
Very low income (VLI)	13	6.7%
Low Income (LI)	0	0%
High Income	0	0%
Average Household Income	\$10,708.91	

**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. () 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))

**Deconcentration Policy of Lorain Metropolitan Housing Authority**

To address deconcentration issues, LMHA has chosen a strategy of working with current households to raise their incomes rather than adjusting admissions policies or criteria. With more than 89% of the public housing households being Extremely Low Income (ELI), 20.6% having zero annual income, and none of the public housing properties being above the high end of the Established Income Range (EIR), there are no opportunities to transfer higher income residents to lower income properties. Note that 93% (1167) of the 1256 public housing families that are ELI have annual household incomes below ELI for a single person (i.e., family of one).

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 in public housing 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.

**B.1b**

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.

Board resolution 8402-99; 6-16-99

**Deconcentration Statistics**

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

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

In calendar year 2014, LMHA had 2 properties with average household incomes below the EIR: Wilkes Villa (\$566 below EIR) and Lakeview Plaza (\$208 below EIR). At Wilkes Villa, more than 28% of the households have zero income. At Lakeview Plaza (a high rise consisting of 0- and 1-bedroom units), more than 23% of the households have zero income. No properties were above EIR.

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

In calendar year 2016, the EIR range was \$7962 to \$10,772 with the average annual family income PHA-wide of \$9367. There were 2 properties with average annual family incomes below EIR: Leavitt Homes: (\$1104 below EIR), with 56 households (29%) having zero income and 81 adults with Community Service requirements. Westgate Apartments (\$3894 below EIR), with 4 of 11 households having zero income, 7 have an average income of \$4068, & 5 adults have Community Service requirements. No properties were above EIR.

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

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

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

In calendar year 2020, the EIR range was \$8,013 to \$10,841 with the average annual family income PHA-wide of \$9,427. There were 3 properties with average annual family incomes below EIR: Westview Terrace (\$34 below EIR), with 32 households (23.4%) having zero income; Wilkes Villa (\$605 below EIR), with 59 households (34.3%) having zero income; Westgate Apartments (\$4167 below EIR), with 1 of 12 (8.3%) households having zero income, and 8 households (75%) having an income at or below \$1800/year. No properties were above EIR.

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

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

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

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

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

In 2019, 88.6% of applicants for public housing were ELI; 19.7% of PH households have zero income.

In 2020, 77.5% of applicants for public housing were ELI; 20.6% of PH households have zero income.

To address deconcentration issues, LMHA has chosen a strategy of working with current households to raise their incomes rather than adjusting admissions policies or criteria. With 89.4% of the public housing households being ELI, 20.6% 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.1b

**Summary of policies governing eligibility, selection and admission**

Statement of Policies that govern resident or tenant eligibility, selection and admission, and procedures for maintaining the waiting list:

Applications for LMHA's housing programs are accepted at the LMHA Main Office 1600 Kansas Avenue in Lorain when the waiting lists are open. The Placement Department processes all applications following eligibility and tenant selection procedures defined in the respective program's policies: PH follows the Admissions and Continued Occupancy Policy (ACOP); HCVP follows the HCVP Administrative Plan; Section 8 New Construction follows the Tenant Selection Plan. These documents are posted online and are available at LMHA administrative offices. The Public Housing ACOP shall apply to households entering the LMHA Oberlin Homes Low Income Housing Tax Credit (LIHTC) units. However, the requirements of the LIHTC program must also be met.

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

Bedroom size may also be based upon reasonable accommodations and LMHA occupancy standards. No preferences are used. Waiting lists for PH are based on bedroom size. LMHA does not maintain site based waiting lists.

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

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

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

All applicants must meet the eligibility criteria for the program they are applying for, including a background check to determine if the applicant's admittance would have a detrimental effect on other tenants or on the development environment.

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

During the application process, should an applicant fail to comply with the application process and/or fail to provide required documentation and/or fail to reply to correspondence, their application will be removed from the waiting list. Applicants are given a deadline of ten (10) business days to respond. Once an application is removed from the waiting list, the applicant must reapply. Applications will not be reinstated to the waiting list unless they were removed in error by the HA or due to circumstances beyond the family's control.

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

Families will be selected from the waiting list on a first-come, first-served basis according to the date, time, and bedroom size their application is received by the PHA. Should two (2) or more eligible applicants have identical date and time of application, placement on waiting list shall be determined by any relevant state or federal regulation. The applicant must accept the vacancy offered within three (3) business days of the date the offer is communicated by phone, voicemail, or email, or text message, if technologically possible. If the applicant cannot be reached by phone or email contact information listed on the application within 24 hours, then LMHA will offer the unit to next applicant on waiting list.

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

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

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

**B.1b**

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

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

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

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

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

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

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

**Financial Resources**

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

Financial Resources - Expended on eligible purposes FYE 6/30/2020	
1	Federal Grants – Current
	Public Housing Operating Fund \$7,374,920.00
	Public Housing Capital Fund \$3,154,874.00
	HOPE VI Revitalization \$0.00
	HOPE VI Demolition \$0.00
	Annual Contributions for Section 8 Tenant Based Assistance \$23,835,615.00
	Resident Opportunity and Self-Sufficiency Grants \$129,344.00
	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) \$2,966,140.00
3	Public Housing Dwelling Rental Income \$2,193,941.00
	<u>\$39,654,834.00</u>

**B.1b**

### **Rent Determination**

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

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

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

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect. LMHA will only conduct interim reexaminations for families:

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

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

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

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

#### **Minimum Rents**

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

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

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

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

Payment standards for bedrooms 0 through 3 are set at 94% of the FMR. Payment standards for bedrooms 4 through 8 are set at 95% of the FMR.

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

#### **Flat Rents**

Flat rents are intended as an incentive for residents to remain in public housing who are attempting to become economically self-sufficient or have attained a level of self-sufficiency. A flat rent is the amount the family pays to LMHA for a specific bedroom size. Changes in family income or composition will not affect the flat rent amount because it is outside the income-based formula. LMHA's flat rent policies comply with Notice PIH 2017-23.

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

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

A PHA may apply for an exception waiver allowing for a flat rental amount for a property that is lower than the amount outlined in the options above. The Secretary may grant such an exception if HUD determines that the fair market rent for the applicable market area does not reflect the market value of the property and the proposed lower flat rental amount is based on a market analysis of the applicable market. Requests for exception rents must be made in accordance with procedures described in PIH Notice 2017-23 or subsequent notices.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Mixed Families**

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

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

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

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

B.1b

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

Following are the proposed changes to the LMHA Admissions and Continued Occupancy Policy to go into effect July 1, 2021.  
*Refer to Exhibit A for a listing of proposed changes.*

**Housing Choice Voucher Program Administrative Policy Changes**

Following are the proposed changes to the LMHA HCVP Administrative Policy to go into effect July 1, 2021.  
*Refer to Exhibit B for a listing of proposed changes.*

**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 89 active participants and has assisted 185 participants to purchase homes since the program's inception in 2002. Seven (7) participants became new homeowners in 2020. LMHA has a goal of seven (7) new homeowners in 2021.

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

In order to maintain our HUD approved status, LMHA must have 30 clients participating in housing counseling and education classes each year. In 2020, the program had:

- 90 families participate in counseling and education activities
- 29 complete financial literacy workshop
- 16 complete pre-purchase homebuyer education workshop
- 31 receive one-on-one counseling for pre-purchase/home buying
- 12 receive one-on-one counseling for home maintenance and financial management for homeowners
- 2 receive one-on-one counseling for resolving or preventing mortgage delinquency or default

**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\(m\)](#))

- 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, 182, 5.91%, of the 3082 cases occurred among the 948 housing units in Lorain. (In 2019, there 452, or 6.8%, of 6626 reports. In 2018, there were 356, or 5%, of 7023 reports. In 2017, there were 729, or 10%, of 7287 reports.) Statistics from the Elyria Police Department show that of all the police calls for service in the city of Elyria, 57, or %, of the 1521 calls for service occurred among the 452 housing units in Elyria. (In 2019, 988, or 2.7%, of 36,409 calls. In 2018, 160, or 3%, of the 5421 reports. In 2017, 126, or 2.25%, of 5594 reports. In both 2017 and 2018, these statistics did not include all calls for service as accounted for in 2019, but only police reports and criminal violations were counted.)
- ii. LMHA contracts with off-duty police officers to provide above-baseline services by patrolling various properties. The Lorain Police Department (LPD) ceased to operate the Community Policing Team at Leavitt Homes, Westview Terrace and Southside Gardens in 2020 due to the COVID-19 pandemic. The CPT substation on West 24<sup>th</sup> Street removed from non-dwelling unit status and was returned to use for housing.

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. Due to the COVID-19 pandemic, the RAW patrols were discontinued. LMHA intends to make modifications to the program to ensure safety so that patrols may resume.

Residents are provided Hot Spot cards to facilitate anonymous reporting of suspicious and criminal activity. In calendar year 2020, LMHA received only 4 Hot Spot cards as most reports come in by personal letters, emails, voice mail messages, and the "Fraud Complaint" hotline on the LMHA website. Twenty-six (26) households were evicted from public housing in calendar year 2020 due to criminal or drug related activities. In 2019, there were 21 Hot Spot cards and 18 evictions. In 2018, 32 Hot Spot cards and 11 evictions.

LMHA hired part-time Building Monitors in an effort to control access to high-rise buildings. Though this helped to some extent, it has been challenging to hire enough Building Monitors and to retain employees for these positions. LMHA contracted with a private security firm to monitor the entrances to the buildings and control access. These guards have had a positive impact on reducing problems.

**B1.b**

**Safety and Crime Prevention, continued**

Due to the COVID-19 pandemic, LMHA’s Criminal Investigator cancelled monthly office hours at each property.

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

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

In calendar year 2019, LMHA applied for the ESSG for Riverview Plaza. Although the application was deemed complete and acceptable, it was not selected in the lottery. However, LMHA moved forward with the project in 2020 using Capital Funds. The majority of exterior lights and interior lights in common areas were replaced and upgraded to LED. A DVR was installed to record the activity on 107 cameras.

LMHA has budgeted for safety and security projects of varying scope for Leavitt Homes, Westview Terrace, Westgate Apartments, Wilkes Villa, John Frederick Oberlin Homes, Kennedy Plaza, Albright Terrace, and Southside Gardens.

- iii. LMHA’s Criminal Investigator communicates with the local police departments and the county sheriff’s department periodically to discuss reports of criminal activity or results of patrols on LMHA properties. Lorain Police Department automatically notifies the Criminal Investigator when any report is generated at any LMHA address in the City of Lorain. Elyria Police Department also notifies the Investigator of any criminal activity occurring on LMHA properties in Elyria. Monthly police activity /patrol sheets are submitted to Investigator where patrols and incidents for the 30 day period are documented. The Investigator also coordinates activities with the Marshall Service, local narcotic bureaus, and detective bureaus. The Investigator and Executive Director meet at least annually with the Chiefs of Police and Patrol Liaison Officers to discuss crime trends, ongoing resident problems, and target areas for drugs and criminal activity.

**Safety and Crime Prevention (VAWA)**

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

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>.

**B1.b**

**Pet Policy**

Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))  
The LMHA Pet Policy is Chapter 10 in the ACOP. No modifications are proposed.

**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.

<p><b>B.2</b></p> <p><b>B.2a</b></p> <p><b>B.2b</b></p>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><b><u>OVERVIEW</u></b></p> <p>LMHA will solicit for consultant(s) to assist the Housing Authority in researching the possible courses of action and making recommendations for redeveloping two of its public housing properties, Wilkes Villa and Southside Gardens. LMHA also intends to solicit for architects or urban planners to revise its Master Plans for the properties.</p> <p>LMHA will consider other funding sources for the purposes of redevelopment, such as Mixed Finance Modernization or Development, Capital Fund Financing Program, Choice Neighborhood Planning and Implementation Grants, Conversion of Public Housing to Project-Based Assistance under RAD, HOME, Low Income Housing Tax Credits, Emergency Safety and Security Grants, etc.</p> <p>A Physical Needs Assessment (PNA) will be conducted of all properties in calendar year 2021 to assess immediate and future needs, and long-term viability of each property.</p> <p><b><u>CHOICE NEIGHBORHOODS</u></b></p> <p>1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals.</p> <p>LMHA is considering submission of an application for a Choice Neighborhoods Planning Grant for redevelopment planning for Southside Gardens (OH012-13 and OH012-14) for approximately 105 units and/or Wilkes Villa (OH12-03) for 150 units in future fiscal years.</p> <p><b><u>MIXED FINANCE MODERNIZATION OR DEVELOPMENT</u></b></p> <p>LMHA may opt to apply for either 4% or 9% credits Low Income Housing Tax Credits (LIHTC) and prepare Mixed Finance Applications for the redevelopment activities planned for the 174 units at Wilkes Villa (OH012-003) and the 108 units at Southside Gardens (OH012-013 and OH12-014). A Mixed Finance Project was completed in 2013 (details follow). Development activities are planned.</p> <p><b>MIXED FINANCE MODERNIZATION: LMHA Oberlin Homes Low Income Housing Tax Credit (LIHTC) units</b></p> <p>LMHA was awarded Low Income Housing Tax Credits (LIHTC) for the preservation of low income housing units by substantially renovating 52 of 54 scattered site public housing "pagoda" units in LMHA's AMP 4 (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.</p> <p>The project scope included an interior re-design plus the removal of existing roofs and rebuilding of new style gable or hip roofs. Specifically, the work included replacement of windows, complete kitchen and bath renovation, replacement of existing floor coverings, and the replacement of plumbing, electrical, and HVAC systems with energy efficient systems. Exterior work included the replacement of existing storage sheds, new concrete drives, replacement of concrete stoops and walks, landscaping and back yard drainage.</p> <p>LMHA allocated \$1.5 million of 2011 Capital Fund Program funding for this project (budget line item 1499 Development Activities). The project is a public/private partnership between the Lorain Metropolitan Housing Authority and NRP Holdings LLC, who served as co-developers of the project under 24 CFR Part 941, Subpart F, Mixed Finance Development.</p> <p>LMHA submitted to HUD's Special Applications Center (SAC) an application for disposition (i.e., Inventory Removal Application) for the 52 units, the application was approved on June 26, 2012. The disposition is in the best interests of the residents and the LMHA because it improved the quality of public housing in the community. Furthermore, the disposition of this property enabled the property to be developed pursuant to a mixed-finance development method under 24 CFR 941 Subpart F. The improvements on the property were sold and the land ground leased to LMHA Oberlin Homes LLC, a partnership composed of a non-profit instrumentality of the Lorain Metropolitan Housing Authority known as LMHA Oberlin Homes MM LLC and an investor member. All units will remain as public housing.</p>
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**B.2b**

The units approved for disposition were:

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

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

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

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

## **DEVELOPMENT ACTIVITIES:**

### **Master Plans for Wilkes Villa and Southside Gardens Redevelopment**

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

At Wilkes Villa, the consultant will also assist LMHA in determining the potential use for LMHA-owned parcels of land adjacent to the public housing development. It may be feasible to use the undeveloped land for residential units or for green space, parking lots and non-residential structures. Acquisition Proposals were submitted to HUD to bring these parcels under the footprint of the Wilkes Villa development. LMHA used Capital Funds for the A/E and consultant to design and oversee construction of a new management and maintenance facility and to renovate the existing management/community building at Wilkes Villa. One half of the existing building has been renovated as a medical facility to serve the needs of the residents and the public, in addition to the existing childcare facility. A new Management/Maintenance Facility was completed in 2015.

### **Submission of Development Proposals for Wilkes Villa in 2013**

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

### **Submission of Development Proposals for Southside Gardens in 2013**

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

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

### **Submission of future Development Proposals**

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

### **Submission of Site Acquisition Proposals in 2014**

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

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

<p><b>B.2b</b></p>	<p><b>Wilkes Villa:</b> 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.</p> <p><b>Lakeview Plaza:</b> On June 6, 2014, LMHA submitted to HUD an Acquisition Proposal to acquire 701 Sixth Ct., Lorain (parcel #02-01-005-113-018) for the purposes of a parking lot. This parcel is presently owned by LMHA's Other Business Activities.</p> <p><b>Riverview Plaza:</b> On June 6, 2014, LMHA submitted to HUD an Acquisition Proposal to acquire 317 &amp; 319 East Avenue, Elyria (parcels #06-26-048-000-018 &amp; 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).</p> <p><b>Timetables for submission of proposals</b> Development Proposals as described above for both Wilkes Villa and Southside Gardens were submitted to HUD November 21, 2013. Site Acquisition proposals for the parcels for Leavitt Homes, Westview Terrace, Lakeview Plaza and Riverview Plaza were submitted June 6, 2014 and are pending approval.</p> <p>LMHA may submit the Wilkes Villa and Southside Gardens Development Proposals for redevelopment of the entire properties in fiscal year 2018.</p> <p>LMHA applied for a Choice Neighborhood Planning Grant in August 2014 which, if it had been awarded, would have been used to create a Transformation Plan for the redevelopment of the neighborhood of South Lorain, including Southside Gardens. LMHA would then apply for a Choice Neighborhood Implementation Grant to assist with financing the redevelopment of Southside Gardens. LMHA intends to apply for future Choice Neighborhood Planning Grants, most likely in calendar year 2019.</p> <p><b>Submission of Mixed Finance Applications for Wilkes Villa (OH012-003) &amp; Southside Gardens (OH012-013/OH012-014)</b> LMHA may consider applying for Low Income Housing Tax Credits through the Ohio Housing Finance Agency for the 2019 Qualified Allocation Plan (QAP) for redevelopment of Wilkes Villa (OH012-003) and/or Southside Gardens (OH012-013/014)</p> <p><b>NON-SMOKNG POLICIES</b> 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.</p> <p>LMHA implemented smoke-free policies at all of its owned and managed properties effective May 1, 2018.</p> <p><b>PROJECT BASED VOUCHERS</b> 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.</p> <p>LMHA intends to operate a project-based voucher program and work with community partners to identify specific target populations to be served through project-based vouchers. The agency will issue RFPs in the coming year to utilize up to 300 vouchers. LMHA may also consider applications outside the RFP process consistent with the LMHA Administrative Plan. Selected projects will comply with the goal of expanding the supply of affordable housing and promoting deconcentration of poverty and generally provide increased housing and economic opportunities.</p> <p>LMHA has proposed to utilize up to 300 project-based vouchers to convert two existing PHA-owned public housing developments located in Lorain and Elyria. Southside Gardens in Lorain and Wilkes Villa in Elyria are two public housing developments which have become functionally obsolete. It has been determined the properties exceed HUD thresholds for rehabilitation and need to be replaced. It is anticipated that Southside Gardens would require approximately 105 vouchers and Wilkes Villa 150.</p> <p>The Authority may apply for Low Income Housing Tax Credit funding in the fiscal year to preserve affordable housing. In addition to these projects, the Authority will issue project based vouchers for projects that create affordable housing in areas of lower concentration of poverty in Lorain County, which would be consistent with the deconcentration policy of the LMHA Annual Plan.</p> <p>LMHA includes language in the Administrative Plan regarding deconcentration efforts and general locations other than Lorain and Elyria.</p> <p>The Authority may issue project based vouchers to developer(s) who assist homeless persons or who have one or more disabling conditions that complicate their ability to find and maintain housing, and for Permanent Supportive Housing.</p> <p><b>CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED ASSISTANCE UNDER RAD</b> The public housing properties with greatest need of redevelopment are Southside Gardens in Lorain and Wilkes Villa in Elyria. Because of the challenges in financing the demolition and reconstruction of functionally obsolete properties, LMHA is considering all possible avenues to finance the projects. Therefore, LMHA is considering applying for the Rental Assistance Demonstration (RAD) program to assist in funding these projects.</p>
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B.2b

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

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

B.2b

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

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

B.2b

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

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

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

B.2b

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

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

B.2b

Southside Gardens OH012-014; 28 buildings, 58 units

Construction Date: 8/31/1973

## Units designated for demolition

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

B.2b

**Southside Gardens OH012-14 units designated for demolition (continued)**

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

**Demolition/Disposition Timetable**

The Demolition Applications for Wilkes Villa and Southside Gardens might be submitted to SAC in Fiscal Year 2021. The timetable for actual demolition will depend upon the approval of the demolition application; the approval of development proposals; the availability of funding; and approval of application for Mixed Finance Development, if necessary. Demolition may occur in phases based upon funding.

## Progress Report

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

LMHA's 5-Year Action Plan, including CFP 2020, is comprised of projects and activities from the Physical Needs Assessment (GPNA). Input has also been sought from public housing residents, the Resident Advisory Board (RAB), the public and LMHA employees. All the work listed in the 5-Year Action Plan totals nearly \$80 million.

Since LMHA's annual allotment of capital funds totals just over \$3 million, it is not fiscally possible to complete all high-priority capital improvement projects at all properties, so the priorities must be refined even further. This ensures that projects which impact health and safety issues, integrity of critical building systems, and long-term viability of structures are performed first. These decisions are based not only on the GPNA but also upon results of UPCS inspections and input from COCC administrators, site management, site staff, resident surveys and public meetings. Use of Operating Reserves in accordance with HUD regulations had been part of the capital improvement process; however, such use is no longer permitted. If HUD ends this restriction, LMHA may consider the use of operating reserves for capital improvements if necessary and available.

LMHA is intent upon implementing its Master Plans for Redevelopment of Southside Gardens and Wilkes Villa. It is likely to take years to overcome the challenge of financing multi-million dollar projects. It is necessary to maintain the properties to ensure they remain safe, sanitary and decent. In calendar years 2015, 2016, and 2017 LMHA invested over \$1 million in interior improvements, basement repairs, water infiltration control, and roof repairs and replacement at Southside Gardens. This work will sustain the viability of the property for a number of years as financing is sought and the project is approved for construction.

In calendar year 2020, LMHA completed \$2,622,634 in capital improvement projects agency wide.

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 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 steps towards paperless technologies for applicants, tenants, participants, and employees.

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.

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.

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

- LMHA awarded 64 Project Based Vouchers to EDEN, Inc. for a permanent supportive housing property being constructed in Elyria, Ohio.
- LMHA housed 8 individuals via the Foster Youth to Independence (FYI) initiative. The FYI program targets housing assistance to young people aging out of foster care and who are at extreme risk of experiencing homelessness. The initiative offers housing vouchers to local PHAs to prevent or end homelessness among young adults under the age of 25 who are, or have recently left, the foster care system without a home to go to. There were 15 referrals in 2020, the first one on January 17, 2020. In the program, LMHA partners with Lorain County Children Services and Lorain County Continuum of Care to End Homelessness. For supportive services, LMHA partners with Catholic Charities, New Sunrise Properties for NSP tenants, Nord Center and LMHA's Family Self-Sufficiency program.
- LMHA will continue its collaboration with Lorain County in implementation of Tenant Based Rental Assistance (TBRA). In 2020, LMHA disbursed \$13,500 to assist 26 families with first month's rent or security deposits for voucher program participants residing outside the cities of Lorain and Elyria.

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

- LMHA awarded 64 Project Based Vouchers to EDEN, Inc. for a permanent supportive housing property being constructed in Elyria, Ohio.
- LMHA completed \$2,622,634 in capital improvements for public housing properties, and \$405,426 for roof replacement at International Plaza.
- LMHA completed 5048 tenant requested non-emergency work orders with an average completion time of 6.17 days in calendar year 2020. There were 1724 resident generated emergency work orders with an average completion time of 19.7 hours, and 866 management generated emergency work orders with an average completion time of 5.8 hours.

B.3

**Progress on Goal #3: Enhance the provision of services to residents, applicants, and the public through Resident Services Coordination**

Through a grant from HUD, LMHA is able to provide enhanced direct one-on-one services utilizing the service coordination grant. Ohio Department of Jobs and Family Services assists TANF recipients in pursuing higher education, provide grant and loan information, career counseling and GED classes. LMHA has partnered with Ohio Means Jobs Lorain County to provide a one-stop location for self-help seminars, training programs, a computer lab and information about employment opportunities.

The FSS and Service Coordinator Program Coordinating Committee is composed of representatives from Lorain County whose mission is to assist in the proper implementation of the program. Persons and agencies involved are Ohio Means Jobs Lorain County, El Centro, Lorain County Community College, Department of Veteran Affairs, The Child Care Resource Center, Lorain County JVS, Goodwill, Passages, Inc. Connecting Fathers and Families, and an LMHA Resident.

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

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

- Family Self Sufficiency (FSS) programming for LMHA public housing and HCVP residents
- HCVP Home Ownership Option Program
- Resident Service Coordinator on staff to connect the residents with social service agencies to address their needs
- Public Housing residents were assisted by the Service Coordinator via referrals, surveys, and hardship rent exemptions.
- Nearly 71% of the Service Coordinator's open rent exemption cases that were closed in 2020 were closed due to an increase in resident's income
- Resident Service Coordinator assists in mediation between Project Managers and residents to address matters of rent payment delinquency, community service, housekeeping, lease violations & minimum rent exemption applications
- Resident Services Department helps to establish and maintain Resident Councils in LMHA public housing properties and Resident Advisory Board consisting of public housing residents and HCVP participants
- Green Thumb flower and garden program has inspired residents to take an interest in the beautification of their homes and gardens, and encourage planting of annual and perennial flowers plus urban vegetable gardens. More than 33 individuals participated in 2020 agency wide. Families also cared for community gardens located at Westview, Wilkes, and Southside.
- Computer labs are available at several LMHA public housing high rises giving residents computer and internet access to look for employment, complete online applications, send/receive emails, etc. Computer kiosks are also available in the LMHA main office lobby. However, due to the COVID-19 pandemic, access to the labs has been restricted since April 2020.
- Resident Assistance Watch (RAW) programs to engage public housing residents in monitoring their properties. Residents can earn community service hours while participating. RAW membership is active at various LMHA high rises. Due to the COVID-19 pandemic, this program has been put on hold until safe practices can be created and training modified.
- Presentations provided by various speakers to discuss Medicare, Medicaid, and Fraud Awareness.
- LMHA is a Certified Credit Counseling agency
- LMHA conducts Homebuyer's Education Classes which fulfills HUD Approved Pre-Purchase Housing Counseling
- Boys and Girls Club: On site at Westview Terrace provided virtual learning and care center for 23 students, 3 of whom reside at the property
- Boys and Girls Club: On-site at Southside Gardens provides childcare for 40 children, 1 of whom reside with the Housing Authority
- Domestic Violence Awareness task force in collaboration with the Genesis House
- Referrals made to a Mary Lee Tucker application center to provide clothing for families
- Lorain County Health and Dentistry operates a medical and dental center in Wilkes Villa for residents and the general public
- Horizon Day Care facility in Wilkes Villa provides day care to residents and employment opportunities. As of December 31, 2020 there were 42 children who reside at Wilkes Villa served by/enrolled at Horizon.
- In partnership with Horizon Education Center and the Boys and Girls Club of Lorain County, the USDA Summer Food Program provides children with breakfast and lunch at Wilkes Villa, Leavitt Homes, Westview Terrace and Southside Gardens
- Offer Financial Assistance for Education to assist residents to improve work skills and achieve individual and educational goals
- Publishes a bi-monthly newsletter to keep public housing residents informed on available housing and community programs
- Binders with community resource information are accessible to public housing residents through each development's Management office
- Residents at various LMHA properties are offered twice-monthly shuttle services to local supportive service agencies and shopping locations
- In collaboration with local supportive and faith-based organizations, holiday meals were provided to residents throughout LMHA properties
- LMHA participated in an eviction prevention program in collaboration with United Way and their UCAN Collaborative to assist Public Housing residents who were recently unemployed or under-employed
- LMHA participated in the Tenant Based Rental Assistance (TBRA) program for HCVP participants to assist with security deposits & utilities distributing \$13,500 to assist 26 families
- Lorain County Homeless Task Force
- Lorain County Goodwill: Job Club
- Ohio Means Jobs: Employment Opportunities
- Catholic Charities: Resources
- Lorain County Health and Dentistry is on-site at Wilkes Villa and also located close to Lakeview Plaza, Kennedy Plaza, and John Frederick Oberlin Homes
- High rise residents were served holiday food boxes through a partnership with Salvation Army at Riverview and Harr Plaza
- In 2020, the group Love Elyria supported restaurant owners in Elyria, Ohio. During this time, Love Elyria donated 200 hot meals to Harr Plaza, 200 hot meals to Riverview, and 100 pizzas to Wilkes Villa.
- As part of the Little Free Library Initiative, 4 LMHA Public Housing properties have Little Free Libraries on site stocked with books to promote literacy and the love of reading
- Second Harvest provided Housing Authority 91 individuals at Riverview, Kennedy, International, and Harr Plazas with monthly Senior Food Boxes
- During the summer on 2020, Our F.A.M.I.L.Y. distributed 2,769 meals and snacks to Wilkes Villa residents.

B.3

- Invest Elyria assisted a total of 486 families, or 1,905 individuals, which included 119 senior citizens, 859 adults, and 927 children with the food pantry that is located at Wilkes Villa.
- LMHA partnered with the Urban League to collect information for Census at Wilkes Villa, Riverview, Southside Gardens, & Westview
- LMHA distributed backpacks stuffed with school supplies at Leavitt Homes, Westview Terrace, Wilkes Villa, Southside, & Oberlin Homes.
- LMHA collaborated with the Lorain Public Library to distribute tablets and hot spots to help children attend their online virtual schooling.
- LMHA collaborated LCCAA to distribute 195 winter coats to children at throughout LMHA's public housing communities.
- Through a collaboration with Good Knights, nearly 100 children at Wilkes Villa received new beds and bedding.

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

- Retrofit units with desired accessible features for residents who request accommodations
- LMHA reviewed 466 requests for reasonable accommodations in 2020

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

Through effective implementation of Family Self Sufficiency and Home Ownership programs, utilization of resources in the Resident Services Department, and collaboration with other agencies throughout Lorain County, LMHA aims to empower and equip families to improve their quality of life, achieve economic stability, and reduce their need for government assistance.

LMHA's Public Housing FSS program statistics for January 1, 2020 thru December 31, 2020:

- 65 current PH FSS Participants
  - 50 are currently employed at least part time
  - 18 new participants were added
  - 10 graduated from the program with final disbursements totaling: \$ 34, 856.92
  - 48 have positive escrow accounts totaling \$ 105,889.11
  - 16 started new escrow accounts
  - 13 restarted or had an increase in their monthly escrow deposit amounts
  - 11 started new jobs
  - 7 received a promotion/increase wages
  - 6 took part in job prep activities\*
  - 26 have a degree and or professional certificates
  - 12 are pursuing their Associate's degrees or Bachelor's degree
  - 77% of PH FSS of participants were employed on average in 2020
  - Highest Disbursement check total \$ 9,510.17
  - 84 PH FSS Participants received case management in 2020
- \*Many Services from outside agencies unavailable due to COVID-19*

LMHA's Housing Choice Voucher FSS program statistics for January 1, 2020 thru December 31, 2020:

- 67 current HCV FSS participants
- 19 new participants added
- 7 graduated with final escrow disbursements totaling \$24,205.16
- 1 has gone over-income and is not receiving any HAP
- 28 have positive escrow accounts totaling \$79,681.11
- 7 new accounts established this year
- 20 increased their escrow deposits due to higher earned income
- 43 are employed
- 21 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 6 continue to work on their General Education Diploma (GED) (1 earned in 2020)
- 10 are enrolled in college
- 11 have Associate's Degrees (2 earned in 2020)
- 1 has a Bachelor's Degree
- Highest Disbursement check total \$10,187.76

LMHA's Housing Choice Voucher Home Ownership Program has 89 active participants and has assisted 185 participants to purchase homes since the program's inception in 2002. Seven (7) participants became new homeowners in 2020, exceeding the goal of seven (7). LMHA has a goal of seven (7) new homeowners in 2021.

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

In order to maintain our HUD approved status, LMHA must have 30 clients participating in housing counseling and education classes each year. In 2020, the program had:

- 90 families participate in counseling and education activities
- 29 complete financial literacy workshop
- 16 complete pre-purchase homebuyer education workshop
- 31 receive one-on-one counseling for pre-purchase/home buying
- 12 receive one-on-one counseling for home maintenance and financial management for homeowners
- 2 receive one-on-one counseling for resolving or preventing mortgage delinquency or default

B.3

**Goal #6: Promote and market LMHA's owned and managed affordable housing in Lorain County, to include Public Housing, Multifamily housing and the Housing Choice Voucher Program**

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

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

- Continue to provide protective services at various properties as funds are available
- Provide above baseline police protection services at public housing properties as funds are available
- Installed 107 cameras, recorders, and LED lighting at Riverview Plaza
- Hired Building Monitors to control access to buildings
- Continue to encourage residents to report suspicious or criminal activity observed at their properties
- Implement alternative methods of reporting criminal or suspicious activity, such as text messaging, emailing, voicemail, or online reporting capabilities

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

- LMHA replaced incandescent and fluorescent lighting with LED at the COCC and Riverview Plaza
- Reduced the amount of paper consumed through use of TenDocs digital files, DocuSign, and email of documents
- Made progress in implementing electronic applicant files
- Purchased only Energy Star appliances (refrigerators and air conditioners at several properties)
- Utilized low/no-VOC paints and sealants
- Because of the COVID-19 pandemic, meetings and hearings were held via Zoom and conference calls

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

- Continue random Fair Housing testing utilizing third party Fair Housing Testers or "mystery shoppers"
- Conducted annual Fair Housing Training for all employees, with some being tailored to specific personnel, such as maintenance staff, receptionists, management, inspectors, case workers, etc.
- Assist local jurisdictions and the County by providing statistics, information and comments as they conduct their respective Analysis of Impediments (AI)
- Conducted annual training in Reasonable Accommodations

**Goal #10: Promote deconcentration**

- During orientations, promote benefits of living in areas of Lorain County outside of the areas of high poverty by highlighting housing opportunities, services, employment opportunities and amenities
- Increase affordable housing choices by assessing low poverty areas and modifying voucher payment standards
- Supported portability by allowing families the opportunity to move outside of areas of poverty
- Encouraged the use of [www.gosection8.com](http://www.gosection8.com) where families may seek housing via the internet

<b>B.4.</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p>Form 50077-ST-HCV-HP, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.2</b>	<p><b>Civil Rights Certification.</b></p> <p>Form 50077-ST-HCV-HP, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.3</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/> <b>RAB comments are attached as Exhibit C.</b></p> <p>If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<b>C.4</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>D Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).	
<b>D.1</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See LMHA's 2020 5-Year Action Plan HUD Form 50075.2 approved by HUD on September 3, 2020 in EPIC.</p>

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

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

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

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

## B. Annual Plan.

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(1\)](#)) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#)) and 24 CFR §903.12(b).

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.** Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. ([24 CFR §903.7\(b\)](#)) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. ([24 CFR §903.7\(b\)](#)) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. ([24 CFR §903.7\(b\)](#))

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

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

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

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

**Pet Policy.** Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

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

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

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

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

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

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

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

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

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

**Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

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

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

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

### C. Other Document and/or Certification Requirements

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

**C.2 Civil Rights Certification.** Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

**C.3 Resident Advisory Board (RAB) comments.** If the RAB provided comments to the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

**C.4 Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)

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

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

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 16.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

**LORAIN METROPOLITAN HOUSING AUTHORITY**  
**Summary of Changes to**  
**Admissions and Continued Occupancy Policy (FY 2022)**  
**Effective July 1, 2021**

Changing 10 business days to 14 business days throughout plan for time-frame on returning documentation

**Page 3-20 3-III.B. REQUIRED DENIAL OF ADMISSION**

**CURRENT:**

LMHA Policy paragraph 1 & 3

Currently engaged in is defined as any use of illegal drugs during the previous six months.

A record of arrest(s) will not be used as the basis for the proposed denial or proof that the applicant engaged in disqualifying criminal activity.

**PROPOSED:**

LMHA Policy paragraph 1 & 3

Currently engaged in is defined as any use of illegal drugs during the previous three months.

A record or records of arrest(s) will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity.

**Page 3-21 3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION**

**CURRENT:**

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.

**PROPOSED:**

The look-back period for other misdemeanors which may reasonably impact community safety is ONE (1) year. The look-back periods apply from the date of the criminal offense.

**Page 3-23 Previous Behavior LMHA Policy**

Remove: Has a pattern of eviction from housing or termination from federally assisted housing programs within the past three years (considering relevant mitigating circumstances)

**CURRENT:**

Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program

Has been barred from LMHA property

**PROPOSED:**

Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program **in the last three years.**

Is currently barred from LMHA property

**Page 6-13 6-I.E. CALCULATION OF DISALLOWANCE**

**Remove 7 paragraphs**

While qualification for the disallowance is the same for all families, calculation of the disallowance will differ depending on when the family member qualified for the EID. Residents qualifying prior to May 9, 2016 will have the disallowance calculated under the "Original Calculation Method" described below, which requires a maximum lifetime disallowance period of up to 48 consecutive months. Residents qualifying on or after May 9, 2016 will be subject to the "Revised Calculation Method," which shortens the lifetime disallowance period to 24 consecutive months.

Under both the original and new methods, the EID eligibility criteria, the benefit amount, the single lifetime eligibility requirement and the ability of the applicable family member to stop and restart employment during the eligibility period are the same.

Original Calculation Method

Initial 12-Month Exclusion

During the initial 12-month exclusion period, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded. The 12 months are cumulative and need not be consecutive.

PHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion and Phase-In

## ***Exhibit A***

During the second 12-month exclusion period, the exclusion is reduced to half (50 percent) of any increase in income attributable to employment or increased earnings. The 12 months are cumulative and need not be consecutive.

### **Lifetime Limitation**

The EID has a four-year (48-month) lifetime maximum. The four-year eligibility period begins at the same time that the initial exclusion period begins and ends 48 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and Section 8 assistance, or if there are breaks in assistance.

### **PHA Policy**

During the 48-month eligibility period, the PHA will conduct an interim reexamination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g., when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

## **Page 6-41 6-IL.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION Payments to Family Members**

### **CURRENT:**

No disability expenses may be deducted for payments to a member of a tenant family [23 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the tenant family may be deducted if they are reimbursed by an outside source.

### **PROPOSED:**

No disability expenses may be deducted for payments to a member of a tenant family [23 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the tenant family may be deducted if they are **not** reimbursed by an outside source.

*Exhibit B*

**LORAIN METROPOLITAN HOUSING AUTHORITY**  
**Summary of Changes to**  
**HCVP Administrative Plan (FY 2022)**  
**Effective July 1, 2021**

Updated the Table of Contents

Corrected grammatical errors throughout policy

Updated or removed expired Notices, Federal Registers and Guidance from HUD

Changing 10 business days to 14 business days throughout plan for time-frame on returning documentation

**CURRENT:**

**Page 3-29**

Change language to modify the definition of the look-back period. It currently reads “The look-back period for misdemeanors which may not reasonably impact community safety is ONE (1) year. The look-back periods apply from the dates of conviction, release from detention/incarceration, or completion of probation/parole, whichever is more recent, to the date of screening.”

**PROPOSED**

**Page 3-29**

The look-back period for misdemeanors which may reasonably impact community safety is ONE (1) year. The look back periods apply from the date of the criminal offense. The look-back periods apply from the date of the criminal offense.

**PROPOSED:**

**Page 4-7**

Add language in accordance with Notice PIH 2020-28 which states PHAs must place youth referred and determined eligible for FYI vouchers onto their HCV waiting list.

The LMHA waiting list will remain open for Foster Youth to Independence (FYI) initiative vouchers, even when the waiting list for all other vouchers is closed. This is because LMHA must place eligible youth from referrals on the LMHA waiting list in accordance with Notice PIH 2020-28.

**PROPOSED:**

**Page 6-5, second paragraph**

Nan McKay suggested revision. This has been a general practice of LMHA but not specified in the Admin Plan.

Add “school records” to read “When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim dependents. If there is a dispute about which family should claim them, the LMHA will make the determination based on available documents such as court orders, **school records**, or an IRS return showing which family has claimed the child for income tax purposes.

**PROPOSED:**

**Page 6-14 Calculation of the Disallowance**

Delete entire Original Calculation Method subsection, along with the Initial-12 Month Exclusion LMHA Policy, and under Lifetime Limitation LMHA Policy. HUD no longer allows this as the EID is 24 cumulative months.

**Page 6-15**

Remove “Revised” in front of Calculation Method.

**CURRENT:**

Page 6-23 Equity in Real Property or Other Capital Investments

Add “**minus the balance**” to read “The PHA must also deduct from equity the reasonable costs for converting the asset to cash. Using the formula for calculating equity specified above, the net cash value of real property is the market value **minus the balance** of the loan (mortgage) minus the expenses to convert to cash”.

**CURRENT:**

**Page 6-48 Necessary and Reasonable Costs**

To establish the reasonableness of child care costs, the LMHA will use the schedule of child care costs from **the local welfare agency**.

## ***Exhibit B***

### **PROPOSED:**

#### **Page 6-48 Necessary and Reasonable Costs**

Modify existing language and remove “the local welfare agency” to read “To establish the reasonableness of child care costs, the LMHA will use the schedule of child care costs from a **qualified local entity that either subsidizes child care costs or licenses child care providers.**”

### **PROPOSED:**

#### **Page 7-6 LMHA Policy**

We typically request 60 days of paystubs to use with EIV print-outs. There are times when we need additional pay stubs due to the family’s circumstances.

Add text to the last paragraph to read “At the PHA’s discretion, if additional paystubs are needed due to the family’s circumstances (e.g., sporadic income, fluctuating schedule, etc), the LMHA may request additional paystubs or a payroll record.

### **PROPOSED:**

#### **Page 7-27 7-III.J. STUDENT FINANCIAL ASSISTANCE**

Add “[Notice PIH 2015-21] to heading

Add “fees and other required charges” in the first sentence to read “Any financial assistance, in excess of amounts received for tuition, **fees and other required charges**, that a person attending an institution of higher education receives under the Higher Education Act of 1965, from private sources, or from an institution of higher education must be considered income unless the student is over the age of 23 with dependent children or is residing with parents who are seeking or receiving HCV assistance”.

Added “fees and other required charges” under LMHA Policy to read “In addition, the LMHA will request written verification of the student’s tuition, **fees and other required charges**”.

### **PROPOSED:**

#### **Page 8-13 8-II.D. SPECIAL INSPECTIONS**

Add “biennial” in LMHA Policy. LMHA is conducting biennial inspections at this time. It will read “If the annual/biennial inspection has been scheduled or is due within 30 days of the date the inspection is scheduled, the LMHA may elect to conduct a full annual/biennial inspection”. Or I could simply remove the words “annual/biennial”.

### **PROPOSED:**

#### **Page 11-10 New Family and Household Members Requiring Approval**

Add language to prohibit the addition of boyfriend or girlfriend of minor child(ren) to read “The LMHA will not approve the addition of the boyfriend or girlfriend of minor children”. This was a recommendation several years ago. This has been a practice but not specified in the Admin Plan.

### **PROPOSED:**

#### **Page 12-7 Other Authorized Reasons for Termination of Assistance**

Remove the following sentence under LMHA Policy: “Any LMHA has ever terminated assistance under the program for any member of the family”.

### **PROPOSED:**

#### **Page 12-21 Other Good Cause**

Nan McKay suggests adding this language to the section under “After the initial term, the owner may give the family notice at any time, in accordance with the terms of the lease”.

Add “If a property is subject to foreclosure, during the term of the lease, the new owner of the property does not have good cause to terminate the tenant’s lease, unless the new owner will occupy the unit as their primary residence and has provided the tenant with at least a 90-day notice. In that case, the lease may be terminated effective on the date of sale, although the tenant is still entitled to a 90-day notice to vacate. See Section 13-II.G for a discussion of PHA policies relating to units in foreclosure.”

*Exhibit C*

**RESIDENT ADVISORY BOARD (RAB)  
COMMENTS ON THE  
LORAIN METROPOLITAN HOUSING AUTHORITY  
2021 (FY22) ANNUAL PLAN and CAPITAL FUND PROGRAM 5-YEAR ACTION PLAN  
February 9, 2021**

The Lorain Metropolitan Housing Authority (LMHA) met with LMHA's Resident Advisory Board (RAB), the Lorain Association of Residents Countywide (LARC) on February 9, 2021 to discuss the proposed changes to the 2021 Annual Plan and Capital Fund Program Five-Year Action Plan. Fifteen (15) RAB members representing Public Housing, Housing Choice Voucher Program, and Section 8 New Construction (Multifamily housing) participated in the meeting either in person or via Zoom.

LMHA was represented by the Board Chairperson, the LMHA Executive Director, and 12 employees.

The summary of questions and comments on the Plans and LMHA's response and actions follow.

**RAB Question:** Exterminators are coming in without LMHA maintenance. Isn't there something in the lease that states they have to be accompanied by LMHA personnel?

**LMHA Response:** The lease agreement does not state that. LMHA explained the relationship and contract between service providers and LMHA. We will review with staff and consider the concerns, but contractors and their employees are insured, bonded, and are subject to background checks.

**RAB Question:** We need new washers and dryers. They are broken down or are old. They blow lint around.

**LMHA Response:** LMHA has issued a solicitation for the purchase of new washers and dryers, to include a maintenance agreement. Bids are due by March 6, 2021.

**RAB Question:** At Harr Plaza, security guards are needed. Many people come in who do not belong, even people who are banned. Skunk weed and methamphetamines can be smelled in the building occasionally.

**LMHA Response:** Security is one of the most expensive services to provide. LMHA has contracted with a new security firm. Their services begin on Monday, February 15, 2021.

**RAB Question:** There are police officers who patrol Kennedy Plaza. One of them does not like me, he's there just to harass me. Can you do something about that? Can we resume the RAW Patrols?

**LMHA Response:** We will follow up with the police department on your complaint. We have been discussing the RAW program and it is under review by the Executive Director.

**RAB Question:** When the community kitchens are upgraded at Lakeview and Kennedy Plazas, can you provide training to residents so we know how to use the equipment and we can comply with COVID-19 protocols?

**LMHA Response:** Yes, LMHA will ensure that training is provided.

**RAB Question:** Riverview Plaza has a community kitchen, too, which we are not allowed to use. Can it be used?

**LMHA Response:** The kitchen cannot be used until equipment is inspected and safety equipment is tested. Commercial kitchens are subject to a strict schedule for inspections and testing. Since the kitchens were not being used, LMHA stopped the testing due to the expense. LMHA will review the 5-Year Action Plan to ensure the Riverview Plaza community kitchen upgrade is included.

**RAB Question:** New stoves were installed at Kennedy. On my stove, one eye is inoperable. The stoves are too small. The old ones were better.

**LMHA Response:** If your stove is not functioning properly, please call in a work order. This way we can track the problem and determine if it is isolated to one unit or if it is a systemic problem that needs to be addressed by the manufacturer.

## *Exhibit C*

### **RAB Question:**

- Parking at Lakeview is limited. There are too many visitors or abandoned cars. How can this be monitored and improved for residents?
- Parking is a problem at International, also. The parking lot needs repaved. Signs for visitor and tenant parking need to be relocated where they can be seen. Some residents don't move their cars for a long time. You need to require people to move their cars every so many days, or tow them.
- Why not assign a parking space to every apartment?

**LMHA Response:** Parking is a challenge at every property. We cannot assign one space to every apartment because there is not a 1 to 1 ratio of spaces to units. For example, at Riverview, there are 180 apartments but only about 61 spaces. So, LMHA has purchased nearby parcels over the years to expand parking opportunities at many properties.

In July 2019, the Ohio Revised Code was modified in regards to abandoned vehicles and towing. Law enforcement agencies are required to determine if a vehicle is abandoned and whether it may be towed. LMHA cannot require a tenant to move their safe and functioning vehicle just because it has been in the same parking space for a long time.

**RAB Question:** There are issues at the Albright Terrace parking lot, also.

- Tree branches are covering the parking signs, head in parking signs, etc.
- Can a mirror be placed on the corner of Albright parking lots by A building and D building? People speed through the parking lot as a shortcut to avoid the school buses; please add speed limit signs and "No Cut-Thru" signs
- there are not enough handicapped parking spaces: only 8 out of 50 spaces are for handicapped

**LMHA Response:** LMHA will review these maintenance requests to improve the safety of the parking area.

**RAB Question:** The new roof at International Plaza is leaking on the 5<sup>th</sup> floor.

**LMHA Response:** LMHA will contact the roofing contractor to address the problem. [Note: there is no roof leak.]

**RAB Question:** At Harr Plaza, is the hillside eroding into the river like it was at Riverview? Can the patio on the back of the building be used? Some trees on the hillside are losing limbs and need trimmed or removed.

**LMHA Response:** No, the hillside is not eroding into the river at Harr Plaza. Years ago, the patio on the back of the building shifted away from the building, so LMHA closed it off. It appears to not have moved in some time. If we wish to reopen it, we'll need to evaluate to ensure it is safe. Also, the railing needs replaced due to storm damage.

**RAB Question:** People who were arrested and have a TPO against them were not evicted. Instead, you transferred them to another building! They were barred from our building, but they still come back even with the TPO in place.

**LMHA Response:** Some actions that LMHA takes with one resident cannot be discussed with others, so do not have all the facts of this case. Our relationship is a partnership – if you see someone who is barred from a building, please call the police asap.

**RAB Question:** Can a person's mental health be evaluated prior to admission to LMHA housing?

**LMHA Response:** No, mental health cannot be assessed prior to admission to any housing program.

**RAB Question:** Do we have to disclose our stimulus money? Will it increase the rent amount?

**LMHA Response:** Stimulus money must be reported, all income must be reported, but it does not increase rent amount.

**RAB Question:** Regarding EID, please clarify the rule, the changes in the 24 and 48 months, the difference between PH and HCVP, and if a tenant can use it more than once during their tenancy.

**LMHA Response:** LMHA explained the rule, difference in eligibility between PH and HCVP, when it drops off and how it is used. A resident is eligible to use the EID only once during the extent of their tenancies.

**RAB Question:** How is LMHA conducting HQS inspections during COVID? I just had a physical inspection a few months ago.

## **Exhibit C**

**LMHA Response:** All in-person inspections were cancelled December 10, 2020. LMHA has been conducting virtual inspections using Google Duo for new or initial inspections, delayed annual/biennial inspections. We address deficiencies with the use of pictures, inspections from other agencies, video and certifications. LMHA requires certifications from landlords that there are no life-threatening deficiencies in the unit. LMHA will conduct some in-person special inspections.

**RAB Question:** Have you considered sending a checklist of everything LMHA looks for during an inspection to all HCVP tenants? Is LMHA still abating rent?

**LMHA Response:** No, we have not done that. We are still evaluating the procedures. For the abatement process: repairs are due in 30 days for non-life threatening and we start abatement on the 31<sup>st</sup> day. Abatement is for 60 days and we terminate contract and issue voucher to family to locate suitable housing.

**RAB Question:** I have problems with the debit card LMHA issues for URPs. It's for US Bank and the only physical location around is in Walmart! Why would LMHA select some obscure bank and not some larger bank?!

**LMHA Response:** There is an 800 number on the card that you can call for set up and access problems. You can also create an online account to review balances. [The HCVP Manager met with this individual after the meeting to discuss the problem further.]

**RAB Question:** Is LMHA giving a cost of living rent increase to landlords? I read something about that. Does the foreclosure policy apply to owners selling their property?

**LMHA Response:** No, what you read was a notice on the payment standards. Landlords are not getting a cost of living increase. The foreclosure policy only applies to foreclosures.

### **RAB Comments:**

International Plaza

- new floors were promised
- we wanted the pop machines moved but the COCC said "No!"
- when HUD comes to inspect, 5 guys come by to prepare, then leave

Harr Plaza

- the first floor gets fixed up, not the upper floors
- Walls need refreshed
- Outside lights in the parking lot flicker on and off; don't just change the bulb, fix the problem

**LMHA Response:** We will take your comments into consideration and will address maintenance issues.