

## **IMPLEMENTATION OF DECONCENTRATION POLICY AS REQUIRED BY THE QUALITY HOUSING AND WORK RESPONSIBILITY ACT OF 1998 (QHWRA)**

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

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

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

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

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

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

If a PHA property has an average family income outside the high or low ranges of the Established Income Range (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 Established Income Range to encourage applicant families whose income is above the Established Income Range to accept units in those developments.

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

## 2016 Lorain Metropolitan Housing Authority Deconcentration Analysis

ALBRIGHT TERRACE 0/1 BEDROOM \$661,532 TOTAL INCOME 50 COUNT \$13,230.64 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	0/1 BR AVG OKAY

KENNEDY 0/1 BEDROOM \$1,508,121 TOTAL INCOME 171 COUNT \$8,819.42 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	0/1 BR AVG OKAY

LAKEVIEW PLAZA 0/1 BEDROOM \$1,637,894 TOTAL INCOME 199 COUNT \$8,230.62 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	0/1 BR AVG OKAY

LEAVITT HOMES FAMILY 1,344,058 TOTAL INCOME 196 COUNT \$6,857.44 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE LOW	FAMILY LOW
	AMOUNT BELOW EIR =	\$1,104.44

JF OBERLIN HOMES 0/1 BEDROOM \$514,208 TOTAL INCOME 52 COUNT \$9,888.62 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	0/1 BR AVG OKAY

LMHA OBERLIN HOMES FAMILY 740,152 TOTAL INCOME 49 COUNT \$15,105.14 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	FAMILY OKAY

RIVERVIEW PLAZA 0/1 BEDROOM \$1,459,236 TOTAL INCOME 175 COUNT \$8,338.49 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	0/1 BR AVG OKAY

SOUTHSIDE GARDENS 12-13 FAMILY 396,346 TOTAL INCOME 36 COUNT \$11,009.61 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	FAMILY OKAY

SOUTHSIDE GARDENS 12-14 FAMILY 451,819 TOTAL INCOME 42 COUNT \$10,757.60 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	FAMILY OKAY

SCATTERED SITES FAMILY 1,127,406 TOTAL INCOME 77 COUNT \$14,641.64 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	FAMILY OKAY

WESTVIEW TERRACE FAMILY 1,227,524 TOTAL INCOME 135 COUNT \$9,092.77 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE OKAY	FAMILY OKAY

WESTGATE APARTMENTS 0/1 BEDROOM \$44,748 TOTAL INCOME 11 COUNT \$4,068.00 AVERAGE HOUSEHOLD INCOME	COMPARED TO	
	PHA AVERAGE LOW	0/1 BR AVG LOW

AMOUNT BELOW EIR =

\$3,893.88

\$3,457.65

<b>WILKES VILLA</b> <b>FAMILY</b> <b>1,635,328 TOTAL INCOME</b> <b>168 COUNT</b> <b>\$9,734.10 AVERAGE HOUSEHOLD INCOME</b>	<b>COMPARED TO</b>	
	<b>PHA AVERAGE</b>	<b>FAMILY</b>
	<b>OKAY</b>	<b>OKAY</b>

<b>257 Total number zero income Households</b> <b>18.88% Percent of total households</b>
---

**COMPARISON CRITERIA**

LMHA PUBLIC HOUSING TOTALS			
TOTAL UNITS		TOTAL ANNUAL INCOME	PHA AVG HOUSEHOLD INCOME
1,361		\$12,748,372.00	\$9,366.92
		85% OF PHA AVG	\$7,961.88
		115% PHA AVG	\$10,771.95
			\$24,300
If 115% of the PHA average is less than the ELI income limit for a family of 4, use the income limit for comparisons			

LMHA 0 & 1 bedroom developments			
JFO, Kennedy, Lakeview, Riverview, Westgate, Albright			
TOTAL UNITS		TOTAL ANNUAL INCOME	AVG FAMILY INCOME for 0- & 1-BR
658		5,825,739	\$8,853.71
		85% of 0&1 BR AVG	\$7,525.65
		115% of 0&1 BR AVG	\$10,181.76
			\$14,000
If 115% of the 0/1 BR average is less than the ELI income limit for a family of 2, use the income limit for comparisons			

LMHA family developments			
Leavitt, Westview, Wilkes, LMHA Oberlin Homes, Southside, Scattered Sites			
TOTAL UNITS		TOTAL ANNUAL INCOME	AVG FAMILY INCOME for FAMILY DEVELOPMNT
703		\$6,922,633.00	\$9,847.27
		85% of FAMILY AVG	\$8,370.18
		115% of FAMILY AVG	\$11,324.36
			\$24,300
If 115% of the FAMILY average is less than the ELI income limit for a family of 4, use the income limit for comparisons			

2016 income limits						
	1	2	3	4	5	6
VLI 50%	23,350	26,650	30,000	<b>33,300</b>	36,000	38,650
ELI 30%	<b>14,000</b>	16,020	20,160	<b>24,300</b>	28,440	32,580
LI 80%	37,350	42,650	48,000	<b>53,300</b>	57,600	61,850

SUMMARY OF COMPARISONS			
vs Fam or HR avgs		vs PHA wide avg	
LOW	HIGH	LOW	HIGH
LEAVITT HOMES		LEAVITT HOMES	
WESTGATE		WESTGATE	