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

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

Definitions.

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

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| A. | PHA Information. |
| A.1 | <p> PHA Name: <u>Lorain Metropolitan Housing Authority</u> PHA Code: <u>OH012</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2019</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1438</u> Number of Housing Choice Vouchers (HCVs) <u>3129</u> Total Combined Units/Vouchers <u>4567</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> LMHA posts the Annual PHA plan, the Five Year Plan, and the 5-Year Action Plan elements on its website at www.lmha.org. Plans are also available at the LMHA Main Office, 1600 Kansas Avenue, Lorain, OH 44052 and at all administrative and property management offices: </p> <ul style="list-style-type: none"> o LMHA Procurement Office 1604 Kansas Avenue, Lorain o Leavitt Homes 2153 Lorain Drive, Lorain o Kennedy Plaza 1730 Broadway, Lorain o Lakeview Plaza 310 W. 7th Street, Lorain o Southside Gardens 3010 Vine Ave., Lorain o Albright Terrace 129 Milan Ave., Amherst o John Frederick Oberlin Homes 138 South Main St., Oberlin o Wilkes Villa 104 Loudon Court, Elyria o Riverview Plaza 310 East Ave., Elyria o Harr Plaza 15 Chestnut Street, Elyria o International Plaza 1825 Homewood Drive, Lorain <p> LMHA provides the Plans to each of its resident councils. </p> <p> To obtain additional information on the policies contained in the Annual Plan, visit http://www.lmha.org/about-lmha/ and select either "Annual Reports and Audits" or "LMHA Policies". For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750. </p> |

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

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

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

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

Y N

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

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

Each of the PHA Plan Elements listed in B.1(a) above is addressed in the following pages.

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 2018, more than 88% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 86% of public housing residents, 88% of multifamily residents, and 78% of participants in HCVP are ELI. For comparison, approximately 15% of families in Lorain County are ELI¹. More than 19% of the public housing households (268) have zero annual income. Nearly 400 (more than 20%) public housing adults must perform Community Service. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County.

Approximately 15% 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 (39% 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 13% of the heads of household are elderly.

LMHA processed more than 600 requests for Reasonable Accommodations annually for all housing programs in calendar year 2018.

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

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

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

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

In the past few years, LMHA has become aware of a greater need for accessible units with 3, 4 or 5 bedrooms. To address this need, LMHA's Master Plans for Wilkes Villa and Southside Gardens include designs for approximately 10% of the units to be fully mobility accessible and for all units to be visitable, i.e., constructed utilizing principles of universal design. The prototype building at Southside Gardens, 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.

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

B.1b

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

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

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

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

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

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

The provision of affordable housing is LMHA's mission and specialty. Creation of quality, affordable accessible housing by LMHA has increased in the past 10 years. LMHA's long range plans for redevelopment include almost all units being visitable (i.e., constructed with universal design principles) and creation of additional accessible housing. LMHA's public housing properties are general population and not specifically designed for the elderly or disabled. Yet, universally designed properties are intended to meet the needs of the general population, the elderly, and persons with disabilities. Of LMHA's applicants for housing, 10% of the PH families and 11% of the HCVP families are elderly; 20% of PH and 19% of HCVP families are families with disabilities. In Lorain County, 13% of PH families and 16% of HCVP families housed in Lorain county are elderly; 35% of PH and 43% of HCVP households are families with disabilities. As LMHA redevelops or substantially renovates properties, more accessible and universally designed units will be available to serve the needs of low-income persons described in Elyria's Plan.

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

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

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

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

In Lorain County, 37% of PH families and 52% of HCVP applicant families are self-declared as Black/African American, demonstrating that LMHA's housing programs are meeting the needs of the disproportionately impacted groups described by the City of Elyria. For families housed in Lorain County, the rates are 39% of HCVP families and 42% of PH families. In other words, while 13% of Elyria's population is Black/African American, approximately 40% of LMHA's PH and HCVP families are Black/African American.

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

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

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

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

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

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

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

On page 57, Lorain's Plan summarizes:

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

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

B.1b

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

| Housing Needs of Housing Choice Voucher Program (HCVP) APPLICANTS on Waiting List³ | | | Statistics for Lorain County Households ^{1,2} |
|--|----------------------|----------------------------|--|
| NOTE: LMHA is <i>not</i> currently accepting HCVP applications. | # of Families | % of Total Families | |
| Totals as of December 27, 2018 | 238 | 100% | 118,594 |
| Extremely low income (<=30% AMI) | 200 | 84.0% | 10.2% |
| Very low income (>30% but <=50%AMI) | 32 | 13.5% | 9.7% |
| Low Income (>50% but <80% AMI) | 6 | 2.5% | 14.0% |
| Families with children ⁴ | 168 | 70.6% | 32.77% |
| Elderly families | 24 | 10.1% | 27.42% |
| Families with Disabilities | 32 | 13.5% | 15.3 |
| Hispanic | 67 | 28.2% | 9.52% |
| White | 95 | 39.9% | 85.24% |
| Black/African American | 119 | 50.0% | 8.42% |
| American Indian/Alaska Native | 0 | 0.0% | 0.31% |
| Asian | 0 | 0.0% | 1.01% |
| Native Hawaiian/other Pacific Islander | 2 | 0.8% | 0.04% |
| Multi-racial | 9 | 3.7% | 3.77% |
| Not reported | 13 | 5.4% | - |

Housing Needs of HOUSING CHOICE VOUCHER PROGRAM APPLICANTS not yet processed for eligibility⁵

| | | |
|--|-----|-------|
| Totals as of December 27, 2018 | 160 | 100% |
| Hispanic | 48 | 20.0% |
| White | 59 | 24.6% |
| Black/African American | 145 | 60.4% |
| American Indian/Alaska Native | 1 | 0.4% |
| Asian | 1 | 0.4% |
| Native Hawaiian/other Pacific Islander | 1 | 0.4% |
| Multi-racial | 8 | 3.3% |
| Not reported | 25 | 10.5% |

¹Source for Lorain County statistics: 2013-2017 American Community Survey 5-Year Estimates http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

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

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

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

⁵These persons have submitted an online pre-application only and have not been interviewed to determine eligibility.

B.1b

| Housing Needs of PUBLIC HOUSING (PH) APPLICANTS on Waiting List³ | | | Statistics for Lorain County Households ^{1,2} |
|--|---------------|---------------------|--|
| NOTE: LMHA is currently accepting PH applications. | # of Families | % of Total Families | |
| Totals as of December 27, 2018 | 316 | 100% | 118,594 |
| Extremely low income (<=30% AMI) | 274 | 86.7% | 10.2% |
| Very low income (>30% but <=50% AMI) | 34 | 10.8% | 9.7% |
| Low Income (>50% but <80% AMI) | 8 | 2.5% | 14.0% |
| Families with children ⁴ | 232 | 73.4% | 32.77% |
| Elderly families | 31 | 9.8% | 27.42% |
| Families with Disabilities | 71 | 22.5% | 15.3 |
| Hispanic | 90 | 28.8% | 9.52% |
| White | 143 | 45.3% | 85.24% |
| Black/African American | 139 | 44.0% | 8.42% |
| American Indian/Alaska Native | 1 | 0.3% | 0.31% |
| Asian | 0 | 0.0% | 1.01% |
| Native Hawaiian/other Pacific Islander | 3 | 1.0% | 0.04% |
| Multi-racial | 16 | 5.1% | 3.77% |

Housing Needs of PUBLIC HOUSING (PH) APPLICANTS not yet processed for eligibility⁵

| | | |
|--|------|-------|
| Totals as of December 27, 2018 | 3996 | 100% |
| Hispanic | 939 | 23.5% |
| White | 1535 | 38.4% |
| Black/African American | 1800 | 45.0% |
| American Indian/Alaska Native | 30 | 0.8% |
| Asian | 8 | 0.2% |
| Native Hawaiian/other Pacific Islander | 48 | 1.2% |
| Multi-racial | 168 | 4.2% |
| Not reported | 407 | 10.2% |

¹Source for Lorain County statistics: 2013-2017 American Community Survey 5-Year Estimates http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

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

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

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

⁵These persons have submitted an online pre-application only and have not been interviewed to determine eligibility.

B.1b

| Housing Needs of MULTIFAMILY HOUSING (Harr/International Plazas) APPLICANTS ³ | | | Statistics for Lorain County Households ^{1,2} |
|--|---------------|---------------------|--|
| NOTE: LMHA is currently accepting MF applications. | # of Families | % of Total Families | |
| Totals as of December 27, 2018 | 172 | 100% | 118,594 |
| Extremely low income (<=30% AMI) | 167 | 97.1% | 10.2% |
| Very low income (>30% but <=50% AMI) | 4 | 2.3% | 9.7% |
| Low Income (>50% but <80% AMI) | 1 | 0.6% | 14.0% |
| Elderly/Near Elderly families | 59 | 34.3% | 27.42% |
| Families with Disabilities | 85 | 49.4% | 15.3 |
| Hispanic | 33 | 19.2% | 9.52% |
| White | 77 | 44.8% | 85.24% |
| Black/African American | 71 | 41.3% | 8.42% |
| American Indian/Alaska Native | 1 | 0.6% | 0.31% |
| Asian | 1 | 0.6% | 1.01% |
| Native Hawaiian/other Pacific Islander | 4 | 2.3% | 0.04% |
| Multi-racial | 3 | 1.7% | 3.77% |
| Not reported | 15 | 8.7% | - |

Housing Needs of MULTIFAMILY HOUSING APPLICANTS not yet processed for eligibility⁴

| | | |
|--|-----|-------|
| Totals as of December 27, 2018 | 556 | 100% |
| Hispanic | 112 | 20.1% |
| White | 239 | 43.0% |
| Black/African American | 232 | 41.7% |
| American Indian/Alaska Native | 5 | 0.9% |
| Asian | 2 | 0.4% |
| Native Hawaiian/other Pacific Islander | 7 | 1.3% |
| Multi-racial | 14 | 2.5% |
| Not reported | 57 | 10.2% |

¹Source for Lorain County statistics: 2013-2017 American Community Survey 5-Year Estimates http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

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

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

⁴These persons have submitted an online pre-application only and have not been interviewed to determine eligibility.

B.1b

Housing statistics of current LMHA families

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|---|----------|--------|
| Total HCVP Families (12/27/2018) | 3086 | 100.0% |
| Disabled HOH | 1263 | 40.9% |
| Elderly HOH | 493 | 16.0% |
| Hispanic | 785 | 25.4% |
| Non-Hispanic | 2301 | 74.6% |
| Female HOH | 2579 | 83.6% |
| Male HOH | 507 | 16.4% |
| White | 1688 | 54.7% |
| Black/African American | 1297 | 42.0% |
| American Indian/Alaskan Native | 27 | 0.9% |
| Native Hawaiian/Other Pacific Islander | 24 | 0.8% |
| Asian | 0 | 0.0% |
| Multi-Racial | 50 | 1.6% |
| Extremely low income (ELI) | 2399 | 77.7% |
| Very low income (VLI) | 516 | 16.7% |
| Low Income (LI) | 97 | 3.1% |
| High Income | 11 | .4% |
| Average Household Income | \$12,626 | |

| | | |
|---|-----------|--------|
| Total Public Housing Families (12/27/2018) | 1403 | 100.0% |
| Disabled HOH | 508 | 36.2% |
| Elderly HOH | 185 | 13.2% |
| Hispanic | 393 | 28.0% |
| Non-Hispanic | 1045 | 74.4% |
| Female HOH | 1028 | 73.3% |
| Male HOH | 375 | 26.7% |
| White | 827 | 59.0% |
| Black/African American | 520 | 37.0% |
| American Indian/Alaskan Native | 10 | 0.7% |
| Native Hawaiian/Other Pacific Islander | 15 | 1.0% |
| Asian | 1 | 0.1% |
| Multi-Racial | 30 | 2.2% |
| Extremely low income (ELI) | 1206 | 86.0% |
| Very low income (VLI) | 159 | 11.3% |
| Low Income (LI) | 30 | 2.1% |
| High Income | 8 | 0.6% |
| Average Household Income | \$9240.19 | |

| | | |
|--|----------|--------|
| Total Multifamily Housing Families (Harr and International Plazas) (12/27/18) | 199 | 100.0% |
| Disabled HOH | 179 | 90.0% |
| Elderly HOH | 77 | 38.7% |
| Hispanic | 38 | 19.1% |
| Non-Hispanic | 161 | 80.9% |
| Female HOH | 101 | 50.8% |
| Male HOH | 98 | 49.2% |
| White | 138 | 69.4% |
| Black/African American | 55 | 27.6% |
| American Indian/Alaskan Native | 1 | 0.5% |
| Native Hawaiian/Other Pacific Islander | 1 | 0.5% |
| Asian | 1 | 0.5% |
| Multi-Racial | 3 | 1.5% |
| Extremely low income (ELI) | 176 | 88.4% |
| Very low income (VLI) | 20 | 10.1% |
| Low Income (LI) | 3 | 1.5% |
| High Income | 0 | 0.0% |
| Average Household Income | \$10,497 | |

B.1b

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

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

LMHA’s Deconcentration Policy, included in this document in Section B.1(c) will not change. 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 86% of the public housing households being Extremely Low Income (ELI), 19.1% 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 91% (1097) of the 1206 public housing families that are ELI have annual household incomes below ELI for a single person (i.e., family of one).

The LMHA conducts an annual deconcentration of poverty and income mixing analysis in accordance with 24 CFR Part 903 Subpart A and records the information in B.1(c).

Summary of policies governing eligibility, selection and admission

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 generated online at www.lmha.org. The Placement Department processes all applications following eligibility and tenant selection procedures defined in the respective program’s policies: PH follows the Admissions and Continued Occupancy Policy (ACOP); HCVF follows the HCVF 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.

Pre-applications are accepted at www.lmha.org. LMHA’s software automatically time and date stamps online pre-applications upon completion. Family composition will be determined by the information provided by the applicant when the online pre-application is submitted. Bedroom size shall be based upon family composition, reasonable accommodations, and LMHA occupancy standards. No preferences are used. Waiting lists for PH are based on bedroom size. LMHA does not maintain site based waiting lists.

Applicants are notified by mail of an eligibility interview to complete the application when their application reaches the top of the list and there is a need for applicants for that program and/or bedroom size. Should an applicant miss their original appointment, a second and final appointment will be scheduled. 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 and cause for removal from the waiting list.

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 applications will be removed from the waiting list. Applicants are given a deadline of ten (10) business days to respond, however files are not removed from the waiting list until thirty (30) days have elapsed since the HA’s request. 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:

Applicants shall be selected in sequence by applicant date and time of application for appropriate size units. Should two (2) or more eligible applicants have identical date and time of application, placement on waiting list shall be determined by any relevant state or federal regulation. The applicant must accept the vacancy offered within three (3) business days of the date the offer is communicated by phone, voicemail, or email, or text message, if technologically possible. If the applicant cannot be reached by phone or email contact information listed on the application within this time frame, then LMHA will offer the unit to next applicant on waiting list.

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

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.

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, the application will be removed from the waiting list.

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 6/30/2018 | |
|---|--|
| 1 | Federal Grants - Current |
| | Public Housing Operating Fund \$6,749,616.00 |
| | Public Housing Capital Fund \$2,797,030.00 |
| | HOPE VI Revitalization \$0.00 |
| | HOPE VI Demolition \$0.00 |
| | Annual Contributions for Section 8 Tenant Based Assistance \$21,735,510.00 |
| | Resident Opportunity and Self-Sufficiency Grants \$280,950.00 |
| | 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) \$715,489.00 |
| 3 | Public Housing Dwelling Rental Income \$2,070,562.00 |
| | <u>\$34,349,157.00</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 Project Based Section 8 rents in accordance with respective HUD regulations defined in 24 CFR Part 5 Subpart F, 24 CFR Part 960, Public Housing Occupancy Guidebook, HUD notices, the LMHA Public Housing ACOP (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. The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's rent will change as a result of the increase, and families who are currently on a minimum rent hardship. 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 are 100% of the FMRs.

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

Flat Rents

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

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

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

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

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

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

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

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

B.1b

Flat Rent Policies – How to comply on an annual basis

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Mixed Families

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

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

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

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

B.1b

Operations and Management

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

LMHA operates and manages public housing properties, a Low Income Housing Tax Credit property, multifamily housing/project-based properties (funded under the Section 8 New Construction program), and the Housing Choice Voucher Program.

LMHA is governed by a Board of Commissioners which contracts with three employees to lead the Housing Authority: Executive Director, Assistant Director, and Finance Director. The Authority is comprised of various departments administer its programs: executive management, accounting, contract administration/procurement, admissions, work orders, resident services, building receptionists, Housing Choice Voucher Program, and public/multifamily housing property management. Property management is comprised of 5 public housing AMPs and 5 management/maintenance teams, one of which is responsible for the multifamily properties.

LMHA's rules, standards, and policies for governing the management and maintenance of public housing and LIHTC properties are contained in LMHA's Public Housing Admissions and Continued Occupancy Policy (ACOP).

LMHA's rules, standards, and policies for governing the management and maintenance of multifamily housing properties are contained the Harr and International Plaza Tenant Selection Plan.

LMHA's rules, standards, and policies for governing the management of the Housing Choice Voucher Program are contained in LMHA's HCVP Administrative Plan.

These documents are posted at www.lmha.org/about-lmha/lmha-policies/

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

LMHA's Public Housing ACOP, HCVP Administrative Plan, and the Tenant Selection Plan incorporate a variety of rules, standards, policies, and procedures which govern the management, operation and maintenance of the Public Housing, Multifamily Housing, and the Housing Choice Voucher programs. Some policies may not apply to all programs. Some documents are stand alone and are not in the Policy or Plans. The list of rules, standards, policies, and procedures include, but are not limited to:

- Air Conditioner Surcharge Policy
- Applicant Screening Process
- Appointment of Personal Designee Policy
- Biohazard Cleanup Procedure
- Canvassing Policy
- Community Room Policy
- Community Service Policy
- Confidentiality Policy
- Deconcentration Policy
- Drug Free Safety Program
- EIV Usage & Security Policy
- Elevator Entrapment Procedure
- Emergency Evacuation Procedures
- Ethics/Conflict of Interest Policy
- Eviction Policy
- Excess Water Consumption Surcharge Policy
- Fair Housing Plan
- Flat Rent Policy
- Flood Cleanup Procedure
- Hazard Communication Program
- House Inspection Policy
- Housekeeping Policy
- Housekeeping Referral Program

B.1b

ID Policy for entrance into High Rises
Identity Theft Prevention Policy
Integrated Pest Management Extermination & Bed Bug Policy
Key Usage Policy
Key Usage Policy
Language Access Plan (Limited English Proficiency (LEP))
Minimum Rent Policy
One Strike Policy
Personal Information Policy
Pet Policy/Assistance Animal Policy
Procurement Policy
Public Records Request Policy
Reasonable Accommodations Procedure Manual
Records Retention Policy
Satellite Dish Installation Procedure
Scattered Site Eligibility Criteria
Self-Employment/Small Business Income Policy
Smoke Detector Policy
Smoke Free Policy
Social Media Policy
Take Possession Policy
Transfer Policy
Unreported Income Repayment Policy
Vacancy Management Safeguards
VAWA Policy/Emergency VAWA Transfer Policy
Work Order Procedures

Extermination Policies

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

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

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

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

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

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

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, 2019.

Page 3-12 3-I.M. LIVE-IN AIDE

PHA Policy

CURRENT:

A family's request for a live-in aide may be made either orally or in writing. The PHA will verify the need for a live-in aide with a reliable, knowledgeable professional as provided by the family, such as a doctor, social worker, or case worker. For continued approval, the family must submit a new, written request—subject to PHA verification—at each annual reexamination.

PROPOSED CHANGE:

A family's request for a live-in aide may be made either orally or in writing. The PHA will verify the need for a live-in aide, if necessary, with a reliable, knowledgeable professional as provided by the family, such as a doctor, social worker, or case worker. For continued approval, the family may be required to submit a new, written request—subject to PHA verification—at each annual reexamination.

Page 3-13 3-II.A. Types of Low-Income Families [24 CFR 5.603(b)]

PROPOSED ADDITION:

Final Paragraph added: HUD also publishes over-income limits annually, but these are not used at admission. Over-income limits will be discussed in Chapter 13.

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

If any household member is currently engaged in, has engaged in any of the following criminal activities, has been released from detention/incarceration, or has been released from probation/parole within the past three years, the family will be proposed for denial of ~~denied~~ admission.

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

Criminal Activity [24 CFR 960.203(c)]

PHA Policy

CURRENT:

Paragraph 7: Evidence of such 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. 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.

PROPOSED CHANGE:

Evidence of such 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.

Page 3-23 3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

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

Page 3-33, Part III: DENIAL OF ADMISSION

3-III.G. NOTICE OF ELIGIBILITY OR DENIAL

CURRENT:

If, based on a criminal record or sex offender registration information an applicant family appears to be ineligible, the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 10 business day period, the PHA will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal hearing process.

PROPOSED CHANGE:

If, based on a criminal record or sex offender registration information an applicant family appears to be ineligible, the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information via email, mail, or a scheduled phone call. If the family does not contact the PHA to dispute the information within that 10 business day period, the PHA will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal hearing process. A family that disputes the accuracy or relevancy of the record will receive a determination via email whenever possible.

ADMISSIONS AND CONTINUED OCCPANCY POLICY (ACOP) Changes (continued)

Page 4-12, PART 4-II.F. INFORMAL UPDATING THE WAITING LIST

Purging the Waiting List

PHA Policy

CURRENT:

Paragraph 1: The waiting list will be updated as needed to ensure that all applicant information is current and timely.

Paragraph 3: The family's response must be in writing and may be delivered in person, by mail, by fax, by Tenant Portal when available, or by email to Admissions@lmha.org. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter.

PROPOSED CHANGE:

Paragraph 1: 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.

Paragraph 3: The family's response must be in writing and may be delivered in person, by mail, by fax, by email to Admissions@lmha.org, or by other means communicated on the letter. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter.

Page 4-22 4-III.C. NOTIFICATION OF SELECTION

PHA Policy

CURRENT:

Requirement that the offered unit's utilities, if applicable, must be transferred into the applicant's name within five business days and prior to leasing in order to meet final eligibility requirements. Applicants who are unable to transfer utilities will be deemed ineligible.

PROPOSED CHANGE:

Requirement that the offered unit's utilities, if applicable, must be transferred into the applicant's name within five business days of unit acceptance and prior to leasing in order to meet final eligibility requirements. Applicants who are unable to transfer utilities will be deemed ineligible.

Page 5-3 DETERMINING UNIT SIZE

Increase the occupancy limit from 1 to 2 persons for efficiency apartments

Page 5-6, Part II: UNIT OFFERS

5-II.D. REFUSALS OF UNIT OFFERS

CURRENT:

Applicants may refuse to accept a unit offer for "good cause." Good cause includes 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 not related to considerations of the applicant's race, color, national origin, etc. [PH Occ GB, p. 104]. Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to the PHA's satisfaction that 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 out of day care or an educational program for children with disabilities.

PROPOSED CHANGE:

Applicants may refuse to accept a unit offer for "good cause." Good cause includes 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 not related to considerations of the applicant's race, color, national origin, etc. [PH Occ GB, p. 104]. Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to the PHA's satisfaction that 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.

Page 6-54 6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

Long Term Hardships

PHA Policy

CURRENT:

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

PROPOSED CHANGE:

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent or the family qualifies for Earned Income Disallowance .
- (2) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

B.1b

ADMISSIONS AND CONTINUED OCCPANCY POLICY (ACOP) Changes (continued)

Page 6-59 6-III.E. Phasing In Flat Rents [Notice PIH 2017-23; 24 CFR 960.253(b)]

PROPOSED CHANGE:

PIH Notice number updated from 2015-13 to 2017-23 in heading and second paragraph.

Pages 7-1 thru 7-8 VERIFICATION

PROPOSED CHANGE:

PIH Notice number updated from 2010-19 to 2017-12 in chapter heading, p 7-1 2nd paragraph, p 7-2 1st subheading, p 7-3 last paragraph, p 7-5 2nd paragraph, p 7-6 subheading, p 707 2nd subheading, and p 7-8 1st subheading.

Page 8-2 8-I.B. LEASE ORIENTATION Agenda

CURRENT:

A copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19

PROPOSED CHANGE:

A copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12

Page 8-18 & 8-19 Exhibit 8-1 Smoke-Free Policy

CURRENT:

First Offense: Staff will send the resident a reminder of the Smoke-Free Policy to include a copy of the Smoke-Free Lease Addendum signed by the resident household, linkage to cessation services and their resident services representative.

Second Offense: Staff will send the resident a written letter of the findings of their inspection and second reminder of the Smoke-Free policy including a copy of the Smoke-Free Lease Addendum signed by the resident household, linkage to cessation services and their resident services representative.

PROPOSED CHANGE:

First Offense: Staff will send the resident a reminder of the Smoke-Free Policy to include a copy of the Smoke-Free Lease Addendum, linkage to cessation services and their resident services representative.

Second Offense: Staff will send the resident a written letter of the findings of their inspection and second reminder of the Smoke-Free policy including a copy of the Smoke-Free Lease Addendum, linkage to cessation services and their resident services representative.

Page 9-4 9-I.B STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 960.257]

PROPOSED ADDITION:

Added final paragraph: Two streamlining options are available, depending upon the percentage of the family's income that is received from fixed sources. If at least 90 percent of the family's income is from fixed sources, the PHA may streamline the verification of fixed income and may choose whether to verify non-fixed income amounts in years where no fixed-income review is required. If the family receives less than 90 percent of its income from fixed sources, the PHA may streamline the verification of fixed income and must verify non-fixed income annually.

Page 9-16 9-III.C Required Reporting

PHA Policy

CURRENT:

Third paragraph: The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID). In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

PROPOSED CHANGE:

Added second paragraph: Families who are on a minimum rent hardship are required to report all increases in any income within 10 business days of the date the change takes effect. Failure to report required income increases within 10 business days will result in an interim being conducted in accordance with page 9-17.

Change to third paragraph: The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID) and families who are currently on a minimum rent hardship. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

Page 10-9 10-II.C STANDARDS FOR PETS [24 CFR 5.318; 960.707(b)]

PROPOSED ADDITION:

Added two paragraphs: PHAs may not require pet owners to obtain or carry liability insurance. PHAs may not require that cats be declawed.

B.1b

ADMISSIONS AND CONTINUED OCCPANCY POLICY (ACOP) Changes (continued)

Page 10-23 Exhibit 10-2 ASSISTANCE ANIMAL ADDENDUM

PROPOSED ADDITION:

RULES

Added final paragraph i: Entry of Unit by LMHA Personnel LMHA Personnel will not enter a unit inhabited by a animal without a member of the household being present to restrain the animal, unless LMHA determines a animal has been left unattended or neglected and must be removed immediately. If a unit is to be inspected or a repair is required and the resident is unable to be home, the animal must be restrained in a cage in order for LMHA personnel to perform the necessary work. Dogs shall not be kept in a locked room within the unit. LMHA shall not be responsible if any animal escapes from its residence due to its maintenance, inspections or other activities. Each LMHA leased unit housing an animal will be issued a sticker which must be placed on the door or window of the unit, indicating an animal is present in the unit.

Page 11-6 11-1B COMMUNITY SERVICE REQUIREMENT- Notification Requirements

PHA Policy

CURRENT:

Paragraph 2: On an annual basis, at the time of lease renewal, the PHA will notify the family in writing of the family members who are subject to the community service requirement and the family members who are exempt. If the family includes nonexempt individuals the notice will include a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which they may record the activities they perform and the number of hours contributed. The form will also have a place for a signature by an appropriate official, who will certify to the activities and hours completed.

PROPOSED CHANGE:

Paragraph 2: Paragraph 2: On an annual basis, at the time of lease renewal, the PHA will notify the family in writing of the family members who are subject to the community service requirement.

Page 11-11 11-1D Documentation and Verification of Exemption Status

PROPOSED DELETION:

PHA Policy

Removed Paragraph 1: All family members who claim they are exempt from the community service requirement will be required to sign the community service exemption certification form found in Exhibit 11-3. Upon request, the PHA will provide a completed copy to the family and will keep a copy in the tenant file.

Page 12-9 12-III.B. TYPES OF RESIDENT REQUESTED TRANSFERS

CURRENT:

PHA Policy

The types of requests for transfers that the PHA will consider are limited to requests for transfers due to reasonable accommodation and transfers to a location closer to employment. No other transfer requests will be considered by the PHA.

PROPOSED CHANGE:

PHA Policy

The types of requests for transfers that the PHA will consider are limited to requests for transfers due to reasonable accommodation, transfers to a location closer to employment, and transfers due to family composition. No other transfer requests will be considered by the PHA.

Page 12-15. 12-IV.G. SECURITY DEPOSITS

PHA Policy

PROPOSED ADDITION:

When a family transfers from one unit to another, the PHA will transfer their security deposit to the new unit. The tenant will be billed for any maintenance or others charges due for the "old" unit.

Page 14-3, Part I: INFORMAL HEARINGS FOR PUBLIC HOUSING APPLICANTS

Scheduling an Informal Hearing

CURRENT:

When the PHA proposes denial of admission, the letter will include the date and time of a scheduled hearing. Should an applicant fail to attend or call to reschedule within 10 business days, the PHA will reschedule a hearing one time. Should the applicant fail to attend a second scheduled hearing, the PHA's decision to deny will be upheld.

PROPOSED CHANGE:

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.

Page 14-3, Part I: INFORMAL HEARINGS FOR PUBLIC HOUSING APPLICANTS

Conducting an Informal Hearing

PROPOSED ADDITION:

Added Paragraph 4: In cases of misrepresentation only, when charges or citations are past our look-back period and are not charges that may threaten the health, safety, or welfare of other tenants, applicants may be offered a meeting to review the findings and sign the Fraud Affidavit in lieu of a hearing.

B.1b

ADMISSIONS AND CONTINUED OCCPANCY POLICY (ACOP) Changes (continued)

Page 14-11 14-III.C. APPLICABILITY [24 CFR 966.51]

CURRENT:

PHA Policy

The PHA is located in a HUD-declared due process state. Therefore, the PHA will not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA, or for violent or drug-related criminal activity on or off the premises.

PROPOSED CHANGE:

Added third bullet: Any criminal activity that resulted in felony conviction of a household member

PHA Policy

The PHA is located in a HUD-declared due process state. Therefore, the PHA will not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA, for violent or drug-related criminal activity on or off the premises, or any criminal activity that resulted in felony conviction of a household member.

PROPOSED ADDITION:

Page 14-14 Expedited Grievance Procedure [24 CFR 966.52(a)]

Added third bullet: Any criminal activity that resulted in felony conviction of a household member

Page 15-3 15-IA Preventing Errors and Program Abuse

PHA Policy

CURRENT:

Fourth paragraph: The PHA will provide each applicant and resident with a copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19.

PROPOSED CHANGE:

The PHA will provide each applicant and resident with a copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12.

Page 16-1 Program Administration

CURRENT:

Part VI: Reporting and Record Keeping for Children with Environmental Intervention Blood Lead Level. This part describes the PHA's reporting responsibilities related to children with environmental intervention blood lead levels that are living in public housing.

PROPOSED CHANGE:

Part VI: Reporting and Record Keeping for Children with Elevated Blood Lead Level. This part describes the PHA's reporting responsibilities related to children with elevated blood lead levels that are living in public housing.

Page 16-4 16-IB. Utility Allowances – Air Conditioning

PROPOSED ADDITION:

Final Paragraphs 2-11 added: The PHA has installed air-conditioning in high rises (Kennedy Plaza, Lakeview Plaza, Riverview Plaza, John Frederick Oberlin Homes, Albright Terrace, and Westgate). The resident has the option to choose to use the air conditioning. If the resident chooses to use the air conditioning, the resident will be assessed a surcharge. If the resident chooses to not use the air conditioning they may request in writing that their a/c unit be disabled prior to the beginning of the cooling season. Written request must be submitted to the Manager who will in turn generate a work order. In these cases, the resident will not be surcharged for the use of the a/c nor will they be charged for the a/c to be disabled.

In instances where LMHA does not provide air conditioning in the units, namely the family developments of Leavitt Homes, Westview Terrace, Wilkes Villa, Southside Gardens, and various Scattered Sites, then tenants may be permitted to have their own window air conditioner installed, provided certain criteria are met.

LMHA restricts the size of tenant-owned window air conditioners to 6,000 BTUs and will permit a maximum of two (2) air conditioners per floor. It is the responsibility of the tenant to maintain their air conditioners in good working order.

It is necessary for LMHA maintenance to install the tenant-provided air conditioner to ensure that air conditioners are properly installed for safety, in compliance with regulations, and to avoid damage to the window.

Tenants in the family developments must call in a work order for their air conditioner to be installed. The tenant pays for this installation. This fee includes the actual cost of labor and materials. According to HUD regulations (Uniform Physical Conditions Standards (UPCS)) and fire safety standards, if there is only one window in a room, an air conditioner cannot be installed in that window because it blocks the emergency exit.

Tenants who install an A/C without authorization will be issued a 24-hour notice that LMHA will enter the unit to confirm safe, compliant, and proper installation. If an A/C is installed in a room with only one window, LMHA will remove it. If an A/C is left in a window past the deadline in the Fall, LMHA will remove it.

Residents will be surcharged for the cost of electricity for each air conditioner installed in their unit. This annual surcharge will be on the July rent statement in addition to rent, maintenance charges, etc. Failure to pay the surcharge is grounds for termination of lease.

This fee will be prorated for persons moving in after June 1 but before September 15, and for residents who have paid the surcharge but move out before September 15.

B.1b

ADMISSIONS AND CONTINUED OCCPANCY POLICY (ACOP) Changes (continued)

Fees will be reviewed annually and may be modified based upon utility rates. Every three (3) years, the degree-day portion of the surcharge calculation will be reviewed and adjusted, if necessary, based upon historical temperatures.

Residents will be advised of the surcharges every year when LMHA distributes the utility allowances. Property-specific notices will also be sent out in March or April to all residents. The surcharges will be posted at all LMHA Public Housing Administrative Offices and published on the LMHA website at www.lmha.org.

Page 16-7 16-II.B. FLAT RENTS [24 CFR 960.253(b) and Notice PIH 2015-13]

CURRENT:

Bullet 5: Age of the property

Bullet 9: Utilities provided by the PHA

PROPOSED CHANGE:

Updated PIH Notice number from 2015-13 to 2017-23 in heading.

Bullet 5: Age of the unit

Bullet 9: Utilities provided by the PHA and/or landlord for (comparable units in the market study)

Added: The PHA must provide a corresponding key explaining the calculations used for determining the valuation of each factor.

Page 16-9 16-II.B. FLAT RENTS [24 CFR 960.253(b) and Notice PIH 2015-13]

Establishing Flat Rents

CURRENT:

PHAs must receive written HUD approval before implementing exception flat rents. PHAs that use exception flat rents must conduct a new market analysis, and obtain HUD approval, annually.

PHAs are now required to apply a utility allowance to flat rents. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.

PROPOSED CHANGE:

PHAs must receive written HUD approval before implementing exception flat rents. PHAs with a previously approved flat rent exception request may submit a written request to extend the approved flat rents for up to two additional years, provided local market conditions remain unchanged. Detailed information on how to request exception flat rents can be found in Notice PIH 2017-23.

PHAs are now required to apply a utility allowance to flat rents as necessary. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.

Page 16-10 Payment Thresholds and Page 16-12 Repayment Agreements Involving Improper Payments

PROPOSED CHANGE:

Updated PIH Notice number from 2010-19 to 2017-12

CURRENT:

Page 16-21 PART VI: REPORTING REQUIREMENTS FOR CHILDREN WITH ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVEL

16-VI.A. REPORTING REQUIREMENTS [24 CFR 35.1130(e)]

The PHA has certain responsibilities relative to children with environmental intervention blood lead levels that are living in public housing.

The PHA must report the name and address of a child identified as having an environmental intervention blood lead level to the public health department within 5 business days of being so notified by any other medical health care professional. The PHA must also report each known case of a child with an environmental intervention blood lead level to the HUD field office.

PHA Policy

The PHA will provide the public health department written notice of the name and address of any child identified as having an environmental intervention blood lead level.

The PHA will provide written notice of each known case of a child with an environmental intervention blood level to the HUD field office within 5 business days of receiving the information.

PROPOSED CHANGE:

Page 16-21 PART VI: REPORTING REQUIREMENTS FOR CHILDREN WITH ELEVATED BLOOD LEAD LEVEL

16-VI.A. REPORTING REQUIREMENTS [24 CFR 35.1130(e); Notice PIH 2017-13]

The PHA has certain responsibilities relative to children with elevated blood lead levels that are living in public housing.

The PHA must report the name and address of a child identified as having an elevated blood lead level (EBLL) to the public health department within five business days of being so notified by any other medical health care professional. The PHA must also report each known case of a child with an EBLL to the HUD field office.

PHA Policy

The PHA will provide the public health department written notice of the name and address of any child identified as having an elevated blood lead level.

The PHA will provide written notice of each known case of a child with an EBLL to the HUD field office, and to HUD's Office of Lead Hazard Control (OLHCHH), within five business days of receiving the information.

B.1b

ADMISSIONS AND CONTINUED OCCPANCY POLICY (ACOP) Changes (continued)

Page 16-26 16-VII.C. Notification to Applicants and Tenants [24 CFR 5.2005(a)(1)]

CURRENT:

PHA Policy

Paragraph 3: The PHA will provide all tenants with information about VAWA at the time of admission (see section 8-I.B) and at annual reexamination. The PHA will also include such information in all lease termination notices (see section 13-IV.D).

PROPOSED CHANGE:

PHA Policy

Paragraph 3: The PHA will provide all tenants with information about VAWA at the time of admission (see section 8-I.B). The PHA will also include such information in all lease termination notices (see section 13-IV.D).

PROPOSED ADDITION:

Page 16-47 PART X: Minimum Heating Standards [PIH 2018-19]

Section 111 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) (Public Law 114-201, 130 Stat.782) made changes to Section 9 of the United States Housing Act of 1937 (42 U.S.C. 1437g). Section 9 was amended to added Subsection (o), Public Housing Heating Guidelines, which states, "The Secretary shall publish model guidelines for minimum heating requirements for public housing dwelling units operated by public housing agencies receiving assistance under this section."

PHAs in states, territories, or localities with existing minimum heating standards shall utilize their respective local standards for public housing dwelling units. In instances where no such guidelines exist, HUD has established minimum heating requirements for public housing dwelling units. For a PHA where state or local minimum heating standards do not exist, the PHA shall use the following minimum heating requirements for public housing dwelling units in order to comply with Section 111 of HOTMA:

- ***Minimum Temperature:***
 - o If PHA-controlled, the minimum temperature in each unit must be at least 68 degrees Fahrenheit.
 - o If tenant-controlled, then the heating equipment must have the capability of heating to at least 68 degrees Fahrenheit.
- ***Minimum Temperature Capability:***
 - o PHAs are allowed flexibility in maintenance of the indoor temperature when the outdoor temperature approaches the design day temperature. At no point should indoor temperatures in occupied space drop below 55 degrees Fahrenheit. This flexibility applies when at least one of the below criteria are met:
 - The outside temperature reaches or drops below the design day temperature, or
 - The outside temperature is within five degrees Fahrenheit of the design day temperature for more than two continuous days.
- ***Measurement:*** Temperature measurements must be taken three feet above the floor and two feet from an exterior wall in a habitable room.

PHA Policy

A review of local minimum heating standards indicates 1 locality has no established minimum heating standard and 3 localities established their minimum heating standards at 68 degrees.

Therefore, the PHA will shall utilize 68 degrees as the minimum heating standard.

B.1b

Housing Choice Voucher Program Administrative Policy Changes

Following are the proposed changes to the LMHA HCVP Administrative Policy to go into effect July 1, 2019.

LMHA has adopted the Nan McKay template.

PROPOSED ADDITION:

Page 3-6

In order to qualify as a remaining member, the member must have been living with the family for at least 12 months. The exception is death or permanently confined to medical facility.

CURRENT:

Page 70 Ch. 6, Section C. Visitors

Any adult not included on the HUD 50058, who has been in the unit more than 14 consecutive days or a total of 90 days in a 12-month period, will be considered to be living in the unit as an unauthorized household member.

PROPOSED CHANGE:

Page 3-8 3-I.J. GUESTS

PHA Policy

A guest can remain in the assisted unit no longer than 30 consecutive days or a total of 90 cumulative calendar days during any 12-month period.

CURRENT:

Page 66 Ch. 6, Section C. Definition of Temporarily/Permanently Absent

“Temporarily absent” is defined as away from the unit for more than 90 days.

PROPOSED CHANGE:

Page 3-9 3-I.L. ABSENT FAMILY MEMBERS

PHA Policy

Generally an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family members. Generally an individual who is or is expected to be absent from the assistant unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

PROPOSED ADDITION:

Page 3-23

A veteran is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

PROPOSED ADDITION:

Page 3-27

The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.

PROPOSED ADDITION:

Page 5-5, Add additional Items to Be Included in the Briefing Packet

PHA Policy

The form HUD-5380 domestic violence certification form and the form HUD-5382 notice of occupancy rights, which contains information on VAWA protections for victims of domestic violence, dating violence, sexual assault, and stalking;

“Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse;

“What You Should Know about EIV”, a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19.

CURRENT:

Page 25, Ch 2, Section C

A low-income family that is continuously assisted under the 1937 Housing Act. An applicant is continuously assisted if the family has received assistance under any 1937 Housing Act program within [30] days of voucher issuance. Programs include any housing federally assisted under the 1937 Housing Act.

PROPOSED CHANGE:

The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA’s waiting list.

B.1b

Housing Choice Voucher Program Administrative Plan Changes (continued)

CURRENT:

Page 68 Ch 6, Section C. Absence of Any Member

Any member of the household will be considered permanently absent if s/he is away from the unit for 90 consecutive days except as otherwise provided in this Chapter. Incarceration of more than 30 days is cause for termination; not to exceed 180 days without prior notice to the PHA for charges other than alcohol/drug related activity and/or violent criminal activity. Such charges are an automatic termination.

PROPOSED CHANGE:

Page 3-10 Absent Head, Spouse or Co-head

PHA Policy

An employed head, spouse, or co-head absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Any member of the household will be considered permanently absent if s/he is away from the unit for 180 consecutive days except as otherwise provided in this Chapter. Incarceration of more than 30 days is cause for termination; not to exceed 180 days without prior notice to the PHA for charges other than drug-related activity and/or violent criminal activity.

CURRENT:

Page 68 Ch. 6, Section C. Absence due to Medical Reasons

Absence due to Medical Reasons

If any family member leaves the household to enter a facility such as a hospital, nursing home, or rehabilitation center, the PHA will seek advice from a reliable qualified source as to the likelihood and timing of their return. If the verification indicates that the family member will be permanently confined to a nursing home, the family member will be considered permanently absent. If the verification indicates that the family member will return in less than 90 consecutive days, the family member will not be considered permanently absent.

If the person who is determined to be permanently absent is the sole member of the household, assistance will be terminated in accordance with the PHA's "Absence of Entire Family" policy.

If the person with medical reasons (not drug-related) is absent for more than 90 days and terminated from the program, they may submit a written request to be reinstated to the program within one year of the date they became absent from their unit, should they be able to participate in the program again. An informal review will be held, and if it is established they would qualify for assistance, the person will be placed at the top of the waiting list and receive a Voucher when funding is available.

PROPOSED CHANGE:

Page 3-10 Family Members Permanently Confined for Medical Reasons

The PHA will request verification of the family member's permanent absence from a responsible medical professional. If the responsible medical professional cannot provide a determination, the person will be considered temporarily absent. If the family certifies that the family member is confined on a permanent basis, they may present, and the PHA will consider, any additional documentation or evidence.

If verification indicates that the family member will return in less than 180 consecutive days, the family member will not be considered permanently absent.

If the person who is determined to be permanently absent is the sole member of the household, assistance will be terminated in accordance with the PHA's policy.

CURRENT:

Page 25, Ch 2 Section 6 Income Limits

A low-income family that is continuously assisted under the 1937 Housing Act. An applicant is continuously assisted if the family has received assistance under any 1937 Housing Act program within [30] days of voucher issuance. Programs include any housing federally assisted under the 1937 Housing Act.

PROPOSED CHANGE:

Page 3-13 Using Income Limits for Eligibility

PHA Policy

The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list.

CURRENT:

Page 164, Ch 15 Section A Grounds for Denial or Termination of Assistance

Any member of the household has ever been evicted from public housing within the last three (3) years.

PROPOSED CHANGE:

Page 3-26 3-III.B. MANDATORY DENIAL OF ASSISTANCE

The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.

Page 3-27 3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE

If any household member is currently engaged in, has engaged in any of the following criminal activities, been released from detention/incarceration, or released from probation/parole within the past three years, the family will be proposed denial of ~~denied~~ admission.

B.1b

Housing Choice Voucher Program Administrative Plan Changes (continued)

Page 4-16 4-III.C. SELECTION METHOD

Correct an incomplete sentence to read: "Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable."

Page 4-15 4-III.C. SELECTION METHOD

LMHA will correct the Administrative Plan to read "Applicants who fail to attend two scheduled interviews without PHA approval will be sent a letter advising the family they have been removed from the waiting list. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore, no informal hearing is required."

PROPOSED ADDITION:

Page 5-8

Subleasing includes receiving payment to cover rent and utility costs by a person living the unit who is not listed as a family member.

CURRENT:

Page 54, Ch 5, Section A

GUIDELINES FOR DETERMINING VOUCHER SIZE

| Voucher Size | Persons in Household (Minimum #) |
|--------------|-------------------------------------|
| 0 Bedroom | 1 |
| 1 Bedroom | 1 |
| 2 Bedrooms | 1 |
| 3 Bedrooms | 3 |
| 4 Bedrooms | 5 |
| 5 Bedrooms | 7 |
| 6 Bedrooms | 9 |

PROPOSED CHANGE:

Page 5-12

| Voucher Size | Persons in Household (Minimum – Maximum) |
|--------------|---|
| 1 Bedroom | 1-2 |
| 2 Bedrooms | 2-4 |
| 3 Bedrooms | 3-6 |
| 4 Bedrooms | 4-8 |
| 5 Bedrooms | 6-10 |

CURRENT:

Page 109, CH 8 Section F Extensions

A family may request an extension of the Voucher time period up to a maximum of 120 days. All requests for extensions must be received prior to the expiration date of the Voucher. Extensions are permissible at the discretion of the PHA primarily for these reasons:

Extenuating circumstances such as hospitalization or a family emergency, for an extended period of time, which has affected the family's ability to find a unit within the initial sixty-day period. Verification is required.

The PHA is satisfied that the family has made a reasonable effort to locate a unit, including seeking the assistance of the PHA, throughout the initial sixty-day period. A completed search record may be required.

The family was prevented from finding a unit due to disability accessibility requirements or large size (4-5 bedrooms) unit requirement. The search record may be part of the required verification.

PROPOSED CHANGE:

Page 5-16

The PHA will automatically approve one 30-day extension upon written request from the family.

The PHA will approve additional extensions only in the following circumstances:

It is necessary as a reasonable accommodation for a person with disabilities.

It is necessary due to reasons beyond the family's control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:

Serious illness or death in the family

Other family emergency

Obstacles due to employment

Whether the family has already submitted requests for tenancy approval that were not approved by the PHA

Whether family size or other special circumstances make it difficult to find a suitable unit

Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.

All requests for extensions to the voucher term must be made in writing and submitted to the PHA prior to the expiration date of the voucher (or extended term of the voucher).

The PHA will decide whether to approve or deny an extension request within 10 business days of the date the request is received, and will immediately provide the family written notice of its decision.

B.1b

Housing Choice Voucher Program Administrative Plan Changes (continued)

Page 6-5 6-LB. HOUSEHOLD COMPOSITION AND INCOME

Joint Custody of Dependents

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50-~~51~~ percent or more of the time.

CURRENT:

Page 144, CH 12, Section B

The PHA will follow the verification procedures and guidelines described in this Plan. Verifications for reexaminations must be less than 120 days old.

PROPOSED CHANGE:

Page 6-8

When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the PHA requested date for any initial occupancy and up to 90 days of the PHA requested date for all other changes.

PROPOSED ADDITION:

Page 6-21

PHA Policy

If an asset is owned by more than one person and any family member has unrestricted access to the asset, the PHA will count the full value of the asset unless the family presents evidence that the asset is not effectively owned by the family member. A family member has unrestricted access to an asset when he or she can legally dispose of the asset without the consent of any of the other owners. An asset is not effectively owned by a family member when (1) the asset and any income it earns accrue to the benefit of someone else who is not a member of the family and (2) that other person is responsible for income taxes incurred on income generated by the asset.

If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the PHA will prorate the asset according to the percentage of ownership. If no percentage is specified or provided for by state or local law, the PHA will prorate the asset evenly among all owners.

PROPOSED ADDITION:

Page 6-23

In determining the value of checking and savings accounts, the PHA will use the current balance.

PROPOSED ADDITION:

Page 7-7

The family must provide written third-party verifications through the Department of Job and Family Services and Child Support websites. The PHA will not send third-party verification forms to the Department of Job and Family Services or Child Support as these agencies have notified us that they will not completed and return verification forms.

PROPOSED ADDITION:

Page 7-8

If the family cannot provide original documents, the PHA will pay the service charge required to obtain third-party verifications, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets and expenses is not an unreasonable cost.

PROPOSED ADDITION:

Page 7-31

Expenses Incurred in Past Years

PHA Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:

The anticipated repayment schedule

The amounts paid in the past, and

Whether the amounts to be repaid have been deducted from the family's annual income in past years

PROPOSED ADDITION:

Page 8-3

PHA Policy

Any owner that intends to negotiate a restoration agreement or require an escrow account must submit the agreement(s) to the PHA for review.

Housing Choice Voucher Program Administrative Plan Changes (continued)**PROPOSED ADDITION:****Page 8-6 & 8-7****PHA Policy**

The following are considered life-threatening conditions:

Any condition that jeopardizes the security of the unit

Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling

Natural or LP gas or fuel oil leaks

A fuel storage vessel, fluid line, valve, or connection that supplies fuel to a HVAC unit is leaking or a strong odor is detected with potential for explosion or fire or that results in a health risk if inhaled

Any electrical problem or condition that could result in shock or fire

A cover is missing from any electrical device box, panel box, switch gear box, control panel, etc., and there are exposed electrical connections

Any nicks, abrasions, or fraying of the insulation that exposes conducting wire

Water leaking or ponding near any electrical device

Any condition that poses a serious risk of electrocution or fire and poses an immediate life-threatening condition

Non-working heating system when outside temperature is below 50 degrees Fahrenheit.

Utilities not in service, including no running hot water

Conditions that present the imminent possibility of injury

Obstacles that prevent safe entrance or exit from the unit

Any components that affect the function of the fire escape are missing or damaged

Stored items or other barriers restrict or prevent the use of the fire escape in the event of an emergency

The building's emergency exit is blocked or impeded, thus limiting the ability of occupants to exit in a fire or other emergency

No functioning toilet in the unit

Gas/oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting

A fuel-fired space heater is not properly vented or lacks available combustion air

A non-vented space heater is present

Safety devices on a fuel-fired space heater are missing or damaged

If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the HQS in accordance with HUD requirements. See 8-II-G.

If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H.

PROPOSED ADDITION:**Page 8-10****Owner and Family Inspection Attendance**

HUD permits the PHA to set policy regarding family and owner presence at the time of inspection [HCV GB p. 10-27].

PHA Policy

When a family occupies the unit at the time of inspection an adult family member or adult designated by the family must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.

At initial inspection of a vacant unit, the PHA will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted, but is not required.

CURRENT:**Page 130, Ch 10, Section H Termination of Contract**

If the owner is responsible for repairs, and fails to correct all the deficiencies cited prior to the end of the abatement period, the owner will be sent a notice of impending HAP Contract termination. Prior to the effective date of the termination, the abatement will remain in effect.

If repairs are completed before the effective termination date, the termination will be rescinded by the PHA if the tenant chooses to remain in the unit. Only one Housing Quality Standards inspection will be conducted after the termination notice is issued.

If repairs are completed after the effective termination date and the tenant wishes to remain in the unit, the PHA will require a new lease and contract with an initial inspection.

PROPOSED CHANGE:**Page 8-16****HAP Contract Termination**

The PHA must decide how long any abatement period will continue before the HAP contract will be terminated. The PHA should not terminate the contract until the family finds another unit, provided the family does so in a reasonable time [HCV GB p. 10-29] and must give the owner reasonable notice of the termination. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

PHA Policy

The maximum length of time that HAP may be abated is 60 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the PHA is 30 days.

B.1b

Housing Choice Voucher Program Administrative Plan Changes (continued)

Page 8-18, 8-III.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED

Add last sentence to clarify what happens if unit is in abatement: All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later. A unit that is in abatement is not eligible for an increase in contract rent.

CURRENT:

Page 159, Ch 13, Section F Requests for Approval of Tenancy

When the Family submits a Request for Tenancy Approval, it will be processed using the PHA's policies. If the Family does not submit a Request for Tenancy Approval or does not execute a lease, the Initial PHA will be notified within 10 business days by the PHA.

If the Family leases up successfully, the PHA will notify the Initial PHA within 10 business days, and the billing process will commence.

The PHA will notify the initial PHA if the family fails to submit a request for approval of tenancy for an eligible unit within the term of the Voucher.

If the PHA denies assistance to the family, the PHA will notify the Initial PHA within 10 business days and the family will be offered a review or hearing.

The PHA will notify the Family of its responsibility to contact the Initial PHA if the Family wishes to move outside the PHA's jurisdiction under continued portability.

PROPOSED CHANGE:

Page 9-4

PHA Policy

The RTA must be signed by both the family and the owner.

The owner may submit the RTA on behalf of the family.

Completed RTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, by mail, email or by fax.

The family may not submit, and the PHA will not process, more than one (1) RTA at a time.

When the family submits the RTA the PHA will review the RTA for completeness.

If the RTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RTA, the PHA will notify the family and the owner of the deficiencies.

Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, or by fax. The PHA will not accept missing information over the phone.

When the family submits the RTA and proposed lease, the PHA will also review the terms of the RTA for consistency with the terms of the proposed lease.

If the terms of the RTA are not consistent with the terms of the proposed lease, the PHA will notify the family and the owner of the discrepancies.

Corrections to the terms of the RTA and/or the proposed lease will only be accepted as hard copies, in-person, by mail or by fax. The PHA will not accept corrections by phone.

Because of the time sensitive nature of the tenancy approval process, the PHA will attempt to communicate with the owner and family by phone, fax, or email. The PHA will use mail when the parties cannot be reached by phone, fax, or email.

PROPOSED ADDITION:

Page 9-5

PHA-Owned Units [24 CFR 982.352(b)]

Otherwise eligible units that are owned or substantially controlled by the PHA issuing the voucher may also be leased in the voucher program. In order for a PHA-owned unit to be leased under the voucher program, the unit must not be ineligible housing and the PHA must inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease and that the family is free to select a PHA-owned unit without any pressure or steering by the PHA.

PHA Policy

The PHA has eligible PHA-owned units available for leasing under the voucher program.

The PHA will inform the family of this housing at the time of the briefing. The PHA will also inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease and that the family is free to select a PHA-owned unit without any pressure or steering by the PHA.

PROPOSED ADDITION:

Page 11-6

Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].

PHA Policy

At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. The PHA will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.

B.1b

Housing Choice Voucher Program Administrative Plan Changes (continued)

CURRENT:

Page 141, CH 12, Section B

Completion of Annual Recertification

The PHA will have all recertifications for families completed before the anniversary date. This includes making every reasonable effort to notify the family of any changes in rent at least 10 days before the scheduled date of the change in family rent.

PROPOSED CHANGE:

Page 11-9

The PHA must establish policies concerning the effective date of changes that result from an annual reexamination [24 CFR 982.516].

PHA Policy

In general, an increase in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance.

If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.

If a family moves to a new unit, the increase will take effect on the effective date of the new lease and HAP contract, and no 30-day notice is required.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA, but will always allow for the 30-day notice period.

If the family causes a delay in processing the annual reexamination, increases in the family share of the rent will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

In general, a decrease in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date.

If a family moves to a new unit, the decrease will take effect on the effective date of the new lease and HAP contract.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA.

If the family causes a delay in processing the annual reexamination, decreases in the family share of the rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the PHA by the date specified, and this delay prevents the PHA from completing the reexamination as scheduled.

PROPOSED ADDITION:

Page 11-14 11-IL.C. CHANGES AFFECTING INCOME OR EXPENSES

PHA Policy

The PHA will conduct interim reexaminations in each of the following instances:

For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and conclusion of the 24-month eligibility period.

If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.

If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.

The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.

PROPOSED ADDITION:

Page 11-15

PHA Policy

If a family reports a change that it was not required to report and that would result in an increase in the family share of the 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 family share of rent, the PHA will conduct an interim reexamination. See Section 11-IL.D. for effective dates.

Families may report changes in income or expenses at any time.

B.1b

Housing Choice Voucher Program Administrative Plan Changes (continued)

PROPOSED ADDITION:

Page 14-3

PHA Policy

To ensure that the PHA's HCV program is administered according to the highest ethical and legal standards, the PHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.

The PHA will discuss program compliance and integrity issues during the voucher briefing sessions described in Chapter 5.

The PHA will provide each applicant and participant with a copy of "Is Fraud Worth It?" (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse.

The PHA will provide each applicant and participant with a copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19. In addition, the PHA will require the head of each household to acknowledge receipt of the guide by signing a copy for retention in the family file.

The PHA will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key PHA forms and form letters that request information from a family or owner.

PHA staff will be required to review and explain the contents of all HUD- and PHA-required forms prior to requesting family member signatures.

At every regular reexamination, PHA staff will explain any changes in HUD regulations or PHA policy that affect program participants.

The PHA will require first-time owners (or their agents) to participate in a briefing session on HAP contract requirements.

The PHA will provide owners with ongoing information about the program, with an emphasis on actions and situations to avoid.

The PHA will provide each PHA employee with the necessary training on program rules and the organization's standards of conduct and ethics.

For purposes of this chapter the term error refers to an unintentional error or omission. Program abuse or fraud refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.

PROPOSED ADDITION:

Page 14-4

Quality Control and Analysis of Data

Under the Section 8 Management Assessment Program (SEMAP), HUD requires the PHA to review a random sample of tenant records annually to determine if the records conform to program requirements and to conduct quality control inspections of a sample of units to ensure HQS compliance [24 CFR, Part 985]. (See Chapter 16 for additional information about SEMAP requirements).

PHA Policy

In addition to the SEMAP quality control requirements, the PHA will employ a variety of methods to detect errors and program abuse.

The PHA routinely will use HUD and other non-HUD sources of up-front income verification. This includes The Work Number and any other private or public databases available to the PHA.

At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.

The PHA will compare family-reported income and expenditures to detect possible unreported income.

PROPOSED ADDITION:

Page 15-20 15-VIL.C. SELECTION OF FAMILIES

PHA Policy

The PHA will administer up to 20 new homeownership units per year. The PHA may exceed the number of units planned per year if it is necessary as a reasonable accommodation for a person with a disability. If this occurs, the PHA may reduce the number of homeownership units offered in subsequent years.

Families who have been participating in the PHA's Family Self-Sufficiency program for at least six months, or have graduated from such a program, will be given preference over other families. Elderly and disabled families will automatically be given this preference.

Within preference and non-preference categories, families will be selected according to the date and time their application for participation in the homeownership option is submitted to the PHA.

All families must meet eligibility requirements as defined in Section 15-VII.B. of this plan.

PROPOSED ADDITION:

Page 15-24

PHA Policy

If required by the PHA, families must attend and complete post-purchase ongoing homeownership counseling.

B.1b

Grievance Procedures

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

LMHA's Grievance Procedures comply with 24 CFR Subpart B, §966.50-57 and are contained in the Public Housing ACOP Chapter 14 and HCVP Administrative Plan Chapter 18.

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

Homeownership Programs

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

LMHA's Housing Choice Voucher Home Ownership Program has 83 active participants and has assisted 171 participants in purchasing homes since the program's inception. Twelve (12) participants became new homeowners in 2018, exceeding the goal of seven (7). LMHA has a goal of seven (7) new homeowners in 2019.

Community Service and Self Sufficiency Programs

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

Community Service

LMHA follows HUD guidance in its implementation of the Community Service and Self Sufficiency Requirements (CSSR). LMHA's CSSR policy is Chapter 11 in the ACOP. LMHA complies with the CSSR by notifying each family of the compliance requirements, tracking each adult resident, determining exempt status, and tracking compliance of those who are not exempt.

LMHA provides each family with a copy of the Community Service Policy at lease-up, when a new adult is added to the household, when a family member turns 18, and at any time upon the family's request.

On an annual basis, at the time of lease renewal, the PHA will notify the family in writing of the family members who are subject to the community service requirement.

At least 60 days prior to lease renewal, LMHA will review and verify the exemption status of all adult family members. This verification will only be done on an annual basis unless the family reports a change or LMHA has reason to believe that an individual's exemption status has changed. For individuals who are exempt because they are 62 years of age and older, verification of exemption status will be done only at the initial examination or upon the resident reaching 62 years of age. Upon completion of the verification process, LMHA will notify the family of its determination.

Approximately 90 days prior to the end of the lease term, LMHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit the LMHA-required documentation form(s).

If the family fails to submit the required documentation within the required timeframe, or LMHA-approved extension, the subject family members will be considered noncompliant with community service requirements, and notices of noncompliance will be issued.

LMHA changed the CSSR policy July 1, 2018 by increasing the number of hours per week as the minimum number of hours needed to qualify for a work activity exemption from 10 to 20.

As of December 31, 2018, approximately 20% of public housing households included at least one household member who was required to perform community service.

Family Self Sufficiency

LMHA offers the Family Self-Sufficiency Program, a voluntary program which provides one-on-one case management to participants wishing to increase their earned income. Participants have the opportunity to earn an interest-building escrow account, just by working and paying their rent. Any increases in rent due to an increase in earned income during participation in the program result in a credit to the escrow account. Successful graduates are eligible to be awarded the total amount of their escrow balances.

The LMHA FSS Program will strive to promote and encourage the coordination of public and private resources to enable families to achieve independence and self-sufficiency, the incentive behind this promotion being the establishment of an FSS escrow account.

FSS Participants are referred to various sites in the community if they should have need for Adult Basic Education or GED preparation. The Lorain County Joint Vocational School (JVS) offers job placement and counseling services, plus many vocational studies to help students to pursue non-traditional careers, remedial training, and concentrated training in a variety of office positions. JVS provides financial assistance through Pell grants, OIG assistance, and Single Parent Financial Assistance Program. Lorain County Community College (LCCC) offers a continuing education program through the Partnership Program, on-site childcare, financial aid, and groups designated to assist students in specific fields educationally and culturally.

B.1b

LMHA's Public Housing FSS program statistics for January 1, 2018 thru December 31, 2018:

- 72 current PH FSS Participants
- 51 are currently employed at least part time
- 33 new participants were added
- 9 graduated from the program with final disbursements totaling: \$44,416.67
- 33 have positive escrow accounts totaling \$78,182.94
- 13 started new escrow accounts
- 17 restarted or had an increase in their monthly escrow deposit amounts
- 18 started new jobs
- 15 received a promotion/increase wages
- 42 took part in job prep activities
- 22 have a degree and or professional certificates
- 12 are pursuing their Associate's degrees or Bachelor's degree
- 69% of PH FSS of participants were employed on average in 2018
- Highest Disbursement check total \$11,690.67
- 102 PH FSS Participants received case management in 2018

LMHA's Housing Choice Voucher FSS program statistics for January 1, 2018 thru December 31, 2018:

- 46 current HCVFSS participants
- 20 new participants added
- 11 graduated with final escrow disbursements totaling \$48,213.93
- 5 have gone totally off assistance
- 24 have positive escrow accounts totaling \$65,166.91
- 5 new accounts established this year
- 10 increased their escrow deposits due to higher earned income
- 31 are employed
- 16 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 4 continues to work on her General Education Diploma (GED)
- 9 are enrolled in college
- 6 have Associate's Degrees
- 1 has a Master's Degree
- Highest Disbursement check total \$15,533.49

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 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, and an LMHA Resident.

LMHA complies with the Section 3 requirements by encouraging new families to express interest in being on the list for Section 3 employment opportunities. These lists 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 67% of the Service Coordinator's open rent exemption cases that were closed in 2018 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 35 individuals participated in 2018 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.
- 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.
- Volunteer Income Tax Assistance (VITA) assists over 1,800 families in filing income tax returns and provides information about EITC program, Lorain County Free Tax Coalition has processed over 2 million dollars in refunds. In 2018, 184 tax returns were completed at Kennedy Plaza and 134 tax returns were completed at Riverview Plaza.

B.1b

Resident Services Coordination, continued

- Project Warm, in conjunction with Lorain County Community Action Agency, provides new winter coats to 136 children
- Presentations provided by various speakers to discuss Medicare, Medicaid, the Affordable Care Act, Smoking Cessation, housekeeping, budgeting, home health care, medical equipment and supplies, home delivered meal programs, home delivered medication services, etc.
- LMHA is a Certified Credit Counseling agency
- LMHA conducts Homebuyer's Education Classes which fulfills HUD Approved Pre-Purchase Housing Counseling
- Food pantry is established at Westview Terrace the 4th Friday of every month in collaboration with Vine of Hope
- Boys and Girls Club: On site at Westview Terrace provides childcare for 40 children, 35 of whom reside with the Housing Authority
- Boys and Girls Club: On-site at Southside Gardens provides childcare for 60 children, 31 of whom reside with the Housing Authority
- Junior Olympics in collaboration with the Boys and Girls Club of Lorain County
- Domestic Violence Awareness task force in collaboration with the Genesis House
- LMHA served as 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, 2018 there were 37 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
- LMHA hosts the annual HUD Strong Families initiative public housing properties, which focuses on both the parents and the guardians to connect families to resources that will aid in improving the families' outcomes and unify the family and providing parents and guardians available resource information from different community organizations who also attend the event. In 2017 the event was held at Southside Garden, in 2018 at Wilkes Villa, in 2019 it is anticipated to be held at Leavitt Homes/Westview Terrace. 236 residents attended the Wilkes Villa event.
- Publishes a quarterly newspaper 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
- Through collaboration with the Lorain County Bridges Out of Poverty, and a transportation shuttle provided by Horizon Day Care, LMHA was able to provide available community resources information such as HEAP, Safe Summer Youth Program, and literacy initiatives for the children and families from Wilkes Villa, Leavitt Homes, Westview Terrace, and throughout the community
- Available community resource information was provided to residents at public housing high-rises through Farmer's Market and Resource Fairs
- Residents at various LMHA properties are offered bi-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
- LMHA has partnered up with the Child Care Resource Center to promote and give information about Parent Café's that are held all through Lorain County. A parent café was hosted at the Horizon Day Care facility at Wilkes Villas this past fall. Parent Cafés are proven to reduce child abuse and give awareness and education to parents about child development, parent resiliency, concrete supports in times of need, social and emotional competence of children, and social connections.
- Lorain Public Library: Bookmobile at Westview Terrace and Kennedy Plaza
- Lorain County General Health District collaborative: Smoking cessation
- Lorain County Homeless Task Force
- Lorain County Goodwill: Job Club
- United Way: Job Fairs
- Ohio Means Jobs: Employment Opportunities
- Lorain County Board of Education
- Catholic Charities: Resources
- Lorain County Harvest for Hunger: Food distribution
- 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
- Over 100 individuals, including 62 veterans, were served at the Lorain County Homeless Stand Down, where LMHA representatives were on site equipped with computers to assisted 22 homeless individuals with applying for housing
- High rise residents were served food boxes through a partnership with Salvation Army at Riverview and Harr Plaza
- As part of the Little Free Library Initiative, 4 LMHA Public Housing properties have Little Free Libraries on site stocked with books to promote literacy and the love of reading
- Second Harvest provided Housing Authority 115 individuals at Riverview, Kennedy, International, and Harr Plazas with monthly Senior Food Boxes
- Invest Elyria assisted with providing 557 Housing Authority residents, including 224 children, were served in 2018 by the Mobile Market Food Pantries at Wilkes Villa, Riverview, and Harr Plaza
- 25 hams and 25 turkeys were provided to the residents at Wilkes Villa by Buckeye Healthcare
- LMHA is a Counselor assisted and Self Serve Ohio Benefit Bank site to enable residents to apply for benefits online, apply for the FAFSA, as well as file taxes.

B.1b

Safety and Crime Prevention

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

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

- i. Due to the incidence of drug-related and criminal activity in the areas surrounding, adjacent to, or within some of LMHA's properties, LMHA sees a need for measures to ensure the safety of its residents. Though crime rates are lower in LMHA properties when compared to any comparable geographical size or population in which they are located, residents might be fearful for the safety of their families. Additionally, some people on the waiting list are reluctant to move into one or more developments due to perceived and/or actual levels of minor and/or drug-related crime. Statistics from the Lorain Police Department show that of all the police reports and criminal violations in the city of Lorain, 356, or 5%, of the 7023 cases occurred among the 948 housing units in Lorain. (In 2017, these numbers were 729, or 10%, of 7287 reports.) Statistics from the Elyria Police Department show that of all the police reports and criminal violations in the city of Elyria, 160, or 3% of the 5421 cases occurred among the 452 housing units in Elyria. (In 2017, these numbers were 126, or 2.25%, of 5594 reports.)
- ii. LMHA contracts with off-duty police officers to provide above-baseline services by patrolling various properties. The Lorain Police Department (LPD) and LMHA have implemented a Community Policing Team at Leavitt Homes, Westview Terrace and Southside Gardens. LPD believes that they best serve when they understand the needs and expectations of the people, develop effective partnerships, and ultimately provide comprehensive service by building ties and working closely with the community. A CPT substation was established at 2139 West 24th Street to improve accessibility to residents of the Lorain public housing family developments.

LMHA resident volunteers are trained to participate in the Resident Assistance Watch (RAW) program where they provide an internal neighborhood watch program within the high rise properties. LMHA's Criminal Investigator works with law enforcement agencies and the city-wide neighborhood watch programs. LMHA has contracted a police officer with a K-9 Drug Dog to perform random patrols at LMHA owned and managed properties. This patrol is performed upon request or as needed based upon reported drug activity.

Residents are provided Hot Spot cards to facilitate anonymous reporting of suspicious and criminal activity. In 2018, there were 32 Hot Spot cards submitted, but hundreds of reports were received by personal letters, emails, voice mail messages, and the "Fraud Complaint" hotline on the LMHA website. Eleven (11) households were evicted from public housing in calendar year 2018 due to criminal or drug related activities.

LMHA was awarded a \$250,000 Emergency Safety and Security Grant (ESSG) for improvements for safety and security measures at Lakeview Plaza. The project will include one or more of the following:

- Cameras – interior and exterior to view and record activities where the criminal activities occur most frequently: parking lots, stairwells, laundry rooms, hallways,
- Digital Video Recording systems for the camera systems, capable of 30-days of storage with the ability to download for evidence
- Internet connections adequate to ensure remote viewing by LMHA's Criminal Investigator and Executive Administration
- Lighting – interior and exterior to improve camera viewing and recording ability and to deter loitering at night
- Installation of entry systems in north and south foyers to connect with each apartment and the management office, to include doorbell, intercoms, remote unlocking of entry doors
- Consider methods of enabling each apartment to view 1-8 video cameras (as selected by management) via closed circuit channel, Wi-Fi, mobile phone app, or other means

In calendar year 2019, LMHA intends to apply for the ESSG for Riverview Plaza with similar needs.

- iii. LMHA's Criminal Investigator meets with the local police departments and the county sheriff's department at least once per week to discuss results of patrols in LMHA properties. Lorain Police Department automatically notifies the 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 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.

B.1b

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

LMHA has adopted an Emergency VAWA Transfer Plan. LMHA is a member of the Domestic Violence Awareness Task Force. LMHA collaborates with local community agencies providing services and programs related to domestic violence, dating violence, sexual assault, or stalking to ensure that current information and all informational community programs are available to applicants, residents and staff. The following local organizations offer assistance to victims:

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

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

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

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

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

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

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

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

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

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

B.1b

Pet Policy

Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))
The LMHA Pet Policy is Chapter 10 in the ACOP.
LMHA proposes the following changes to the PH Pet Policy: PHAs may not require pet owners to obtain or carry liability insurance. PHAs may not require that cats be declawed.

Asset Management

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

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

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

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

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

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

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

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

Substantial Deviation

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

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

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

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

Significant Amendment/Modification

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

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

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

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

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

Deconcentration Policy of Lorain Metropolitan Housing Authority

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

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

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

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

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

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

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

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

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

Revised July 2015; April 1, 2016; July 2016

Board resolution 8402-99; 6-16-99

Deconcentration Statistics

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

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

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

In calendar year 2016, the EIR range was \$7962 to \$10,772 with the average 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. With only 12 units, the averages are easily skewed by only a few families.

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

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.

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 87% of the public housing households being ELI, nearly 20% having zero income, and none of the public housing properties being above the high end of the EIR, there are no opportunities to transfer higher income residents to lower income properties.

B.2 New Activities.

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

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

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

CHOICE NEIGHBORHOODS

1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals.

LMHA intends to submit an application for a Choice Neighborhoods Planning Grant for redevelopment planning for Southside Gardens (OH012-13 and OH012-14) for approximately 105 units. The planning grant is likely to have an application deadline in May-June 2019.

Mixed Finance Modernization or Development

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

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

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

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

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

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

The units approved for disposition are:

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

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

B.2b

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 30th 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.

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

B.2b

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

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

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

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

LMHA applied for a Choice Neighborhood Planning Grant in August 2014 which, if it had been awarded, would have been used to create a Transformation Plan for the redevelopment of the neighborhood of South Lorain, including Southside Gardens. LMHA would then apply for a Choice Neighborhood Implementation Grant to assist with financing the redevelopment of Southside Gardens. LMHA intends to apply for future Choice Neighborhood Planning Grants, most likely in calendar year 2019.

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

LMHA may consider applying for Low Income Housing Tax Credits through the Ohio Housing Finance Agency for the 2019 Qualified Allocation Plan (QAP) for redevelopment of Wilkes Villa (OH012-003) and/or Southside Gardens (OH012-013/014)

NON-SMOKING POLICIES

The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects.

LMHA implemented smoke-free policies at all of its owned and managed properties effective May 1, 2018.

The Smoke Free policy is being amended by removing "signed by the resident household" in first offense and second offense (noted in *bold italics*).

First Offense: Staff will send the resident a reminder of the Smoke-Free Policy to include a copy of the Smoke-Free Lease Addendum *signed by the resident household*, linkage to cessation services and their resident services representative.

Second Offense: Staff will send the resident a written letter of the findings of their inspection and second reminder of the Smoke-Free policy including a copy of the Smoke-Free Lease Addendum *signed by the resident household*, linkage to cessation services and their resident services representative.

PROJECT BASED VOUCHERS

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

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 may 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. LMHA has tentatively determined that up to 300 vouchers could be project-based in the Plan year.

The project based vouchers would be used to convert two existing public housing developments to project based section 8 to preserve affordable housing in the Cities of 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.

The Authority proposes to apply for 2019-2020 Low Income Housing Tax Credit funding 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.

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."

LMHA has proposed to utilize project-based vouchers to convert two existing public housing developments that are located in Lorain and Elyria. LMHA includes language in the Administrative Plan regarding deconcentration efforts and general locations other than Lorain and Elyria.

B.2b

Demolition and/or Disposition

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 at Wilkes Villa (OH012-003 in AMP 3 OH012000003) which remain after the construction of the Master Plan Prototype units. None of these units have accessible features. The units designated for demolition are:

Wilkes Villa OH012-003**24 buildings, 174 units;****Construction Date: 8/31/1971**

| Bldg nos. | PIC Bldg No. | Location | Building Type | No. BR |
|------------------|---------------------|------------------------|----------------------|---------------|
| 1 | 003001 | 304 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 1 | 003001 | 306 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 1 | 003001 | 308 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 1 | 003001 | 310 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 1 | 003001 | 312 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 1 | 003001 | 314 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 1 | 003001 | 316 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 1 | 003001 | 318 FULLER ST. ELYRIA | Row or Townhouse | 2 |
| 2 | 003003 | 102 WHITE CT. ELYRIA | Row or Townhouse | 6 |
| 2 | 003003 | 104 WHITE CT. ELYRIA | Row or Townhouse | 3 |
| 2 | 003003 | 106 WHITE CT. ELYRIA | Row or Townhouse | 3 |
| 2 | 003003 | 108 WHITE CT. ELYRIA | Row or Townhouse | 3 |
| 2 | 003003 | 110 WHITE CT. ELYRIA | Row or Townhouse | 3 |
| 2 | 003003 | 112 WHITE CT. ELYRIA | Row or Townhouse | 3 |
| 2 | 003003 | 114 WHITE CT. ELYRIA | Row or Townhouse | 3 |
| 2 | 003003 | 116 WHITE CT. ELYRIA | Non-Dwelling Unit | 6 - B&G club |
| 3 | 003004 | 161 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 3 | 003004 | 163 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 3 | 003004 | 165 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 3 | 003004 | 167 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 3 | 003004 | 169 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 3 | 003004 | 171 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 3 | 003004 | 173 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 3 | 003004 | 175 PRATT BLVD. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 119 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 121 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 123 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 125 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 127 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 129 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 131 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 4 | 003005 | 133 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 136 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 138 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 140 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 142 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 144 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 146 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 148 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 5 | 003006 | 150 PORTIA 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 |
|-----------|--------------|-----------------------|------------------|--------|
| 6 | 003007 | 103 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 6 | 003007 | 105 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 6 | 003007 | 107 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 6 | 003007 | 109 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 6 | 003007 | 111 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 6 | 003007 | 113 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 6 | 003007 | 115 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 6 | 003007 | 117 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 120 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 122 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 124 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 126 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 128 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 130 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 132 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 7 | 003008 | 134 PORTIA CT. ELYRIA | Row or Townhouse | 2 |
| 8 | 003009 | 104 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 8 | 003009 | 106 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 8 | 003009 | 108 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 8 | 003009 | 110 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 8 | 003009 | 112 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 8 | 003009 | 114 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 8 | 003009 | 116 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 8 | 003009 | 118 PORTIA CT. ELYRIA | Row or Townhouse | 4 |
| 10 | 003011 | 103 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 10 | 003011 | 105 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 10 | 003011 | 107 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 10 | 003011 | 109 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 10 | 003011 | 111 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 10 | 003011 | 113 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 10 | 003011 | 115 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 10 | 003011 | 117 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 119 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 120 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 121 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 122 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 123 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 124 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 125 HODGE CT. ELYRIA | Row or Townhouse | 2 |
| 11 | 003012 | 126 HODGE CT. ELYRIA | Row or Townhouse | 2 |

B.2b

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

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

B.2b

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

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

| B.2b Wilkes Villa OH012-003 units designated for demolition (continued) | | | | | |
|--|---------------------|-------------------------|----------------------|---------------|--|
| Bldg nos. | PIC Bldg No. | Location | Building Type | No. BR | |
| 22 | 003024 | 144 BOHANNON CT. ELYRIA | Row or Townhouse | 3 | |
| 22 | 003024 | 146 BOHANNON CT. ELYRIA | Row or Townhouse | 3 | |
| 22 | 003024 | 148 BOHANNON CT. ELYRIA | Row or Townhouse | 3 | |
| 22 | 003024 | 150 BOHANNON CT. ELYRIA | Row or Townhouse | 3 | |
| 22 | 003024 | 152 BOHANNON CT. ELYRIA | Row or Townhouse | 3 | |
| 22 | 003024 | 154 BOHANNON CT. ELYRIA | Row or Townhouse | 3 | |
| 23 | 003025 | 116 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 23 | 003025 | 118 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 23 | 003025 | 120 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 23 | 003025 | 122 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 23 | 003025 | 124 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 23 | 003025 | 126 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 24 | 003026 | 128 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 24 | 003026 | 130 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 24 | 003026 | 132 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 24 | 003026 | 134 BOHANNON CT. ELYRIA | Row or Townhouse | 4 | |
| 25 | 003027 | 102 PRATT BLVD. ELYRIA | Row or Townhouse | 5 | |
| 25 | 003027 | 104 PRATT BLVD. ELYRIA | Row or Townhouse | 5 | |
| 25 | 003027 | 106 PRATT BLVD. ELYRIA | Row or Townhouse | 5 | |
| 25 | 003027 | 108 PRATT BLVD. ELYRIA | Row or Townhouse | 5 | |
| 25 | 003027 | 110 PRATT BLVD. ELYRIA | Row or Townhouse | 5 | |
| 25 | 003027 | 112 PRATT BLVD. ELYRIA | Row or Townhouse | 5 - COPS UNIT | |

| B.2b | | | | | |
|---|---------------------|-------------------------|------------------------|---------------|--|
| 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: | | | | | |
| Southside Gardens OH012-13; 20 buildings, 50 units; Construction Date: 1/31/1972 | | | | | |
| 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 | |

B.2b

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

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

B.2b

Southside Gardens OH012-014; 28 buildings, 58 units

Construction Date: 8/31/1973

Units designated for demolition

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

B.2b

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

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

Demolition/Disposition Timetable

The Demolition Applications for Wilkes Villa and Southside Gardens will be submitted to SAC in Fiscal Year 2020. The timetable for actual demolition will depend upon the approval of the demolition application; the approval of development proposals; the availability of funding; and approval of application for Mixed Finance Development, if necessary. Demolition may occur in phases based upon funding.

B.3 Civil Rights Certification.

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

B.4 Most Recent Fiscal Year Audit.

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

Y N

(b) If yes, please describe: N/A

| | |
|------------|--|
| B.5 | <p>Progress Report. Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>LMHA’s 5-year Action Plan, including CFP 2018, is comprised of projects and activities from the Physical Needs Assessment (GPNA). Input has also been sought from public housing residents, the Resident Advisory Board (RAB), the public and LMHA employees. All the work listed in the 5-year Action Plan totals nearly \$80 million.</p> <p>Since LMHA’s annual allotment of capital funds totals just over \$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.</p> <p>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.</p> <p>In calendar year 2018, LMHA invested \$862,014 in capital improvement projects agency wide.</p> <p>The Housing Authority has also determined to address the accessible needs of the community by implementing visitability and universal design concepts in its projects. LMHA has prudently and assertively worked towards attaining its Section 504 goals.</p> <p>LMHA will continually review its AMP structures to best serve the Housing Authority’s efficiencies of operations.</p> <p>The Authority shall continue its implementation and utilization of technologies to improve the productivity of staff, such as new software to gain insights from housing data, conference calling to reduce employee travel to meetings, and steps towards paperless technologies for applicants, tenants, participants, and employees.</p> <p>Many of LMHA’s goals are not just capital improvements listed in the PHA 5-Year Action Plan. LMHA established many goals and programs, often in collaboration with other social service agencies, governmental authorities, non-profit groups, and private entities, to enhance and improve the living environment and self-sufficiency of residents. An impressive collection of goals and success stories is posted online at http://www.lmha.org/about-lmha/annual-reports/. The reader is encouraged to review the successes of the Lorain Metropolitan Housing Authority that extend beyond the provision of quality affordable housing.</p> <p>For a listing of completed capital fund projects and costs, go to http://www.lmha.org/about-lmha/annual-reports/. Click on documents labeled “50075.1” for a particular year of interest.</p> |
| B.6 | <p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> |
| B.7 | <p>Certification by State or Local Officials. Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> |
| B.8 | <p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p> |
| C. | <p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> |
| C.1 | <p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD on September 6, 2018 in EPIC.</p> |

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**RESIDENT ADVISORY BOARD (RAB)
COMMENTS ON THE
LORAIN METROPOLITAN HOUSING AUTHORITY
2019 (FY20) ANNUAL PLAN and 5-YEAR ACTION PLAN
January 22, 2019**

The Lorain Metropolitan Housing Authority (LMHA) met with the Resident Advisory Board (RAB) on January 22, 2019 to discuss the proposed changes to the 2019 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 participated in the meeting. LMHA was represented by seven (7) employees.

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LMHA sent drafts of the Annual Plan to the RAB members on January 4, 2019 in January so they had an opportunity to review them prior to the meeting and share them with their Tenant Councils and residents of the project. LMHA discussed with the RAB each of the documents and encouraged meeting participants to ask questions or make comments at any time throughout the discussion. The summary of questions and comments and LMHA's response and actions follow.

REVIEW OF ANNUAL PLAN PAGES 1-15 and 31-49

No comments or questions.

REVIEW OF CHANGES TO ACOP, PAGES 16-22 IN ANNUAL PLAN

ACOP Page 8-18 & 8-19 Smoke-Free Policy
8-18 & 8-19

RAB Q: What is the policy/procedure for the smoke-free initiative? What do I do when I find someone smoking or can tell that they are smoking?

LMHA A: We will email you a copy of the policy. It starts with a complaint. After we receive the first complaint, we send a letter, same as any other lease violation. When we receive another complaint we follow the steps per the policy.

ACOP PAGE 14-3 Applicant screening

RAB Q: What if they are charged with a misdemeanor assault? How does that impact housing?

LMHA A: It depends on whether the incident occurred on or off our property, was it a misdemeanor or felony, is it going to impact health and safety of our other residents. We described different ways to report criminal activity. I.e. hot spots, Jim Long, police or directly to the manager. During the investigation, LMHA Investigator will work with LMHA attorney and decide how to proceed. There was a discussion about some specific situations and how they were handled. However, the vice president asked that they speak with their manager about their concern.

ACOP Page 16-47 Minimum Heating Standards [PIH 2018-19]

RAB Q: Who controls the heat in each unit?

LMHA A: There are thermostats in the apartments.

RAB Q: Who controls the heat at Lakeview?

LMHA A: Each resident controls the heat in their own unit.

REVIEW OF CHANGES TO HCVP ADMINISTRATIVE PLAN, PAGES 23-30 IN ANNUAL PLAN

RAB Q: There's no time limit now?

LMHA A: There is. It's 60 days to find housing. This comment is regarding continuously assisted.

68-6 Sec C

RAB Q: You'll terminate assistance even if they let you know they're in jail and it's for child support?

LMHA A: Yes, if it's over 180 days, we'd propose Termination of Assistance if they are the only remaining member of the household.

109 Ch 8

RAB Q: Is the 60 days for moving to a new unit, too?

LMHA A: That process is different because you're already assisted. It starts with 60 days but can be extended. You have to let your landlord know and follow the procedures.

6-8

RAB Q: I have 90 days to get verifications to you?

LMHA A: No you have to get them to us within the timeframe on the letter we send, for instance 2 weeks. The actual verification can't be older than 90 days from when we ask for it.

8-10

RAB Q: I have to be home for inspections?

LMHA A: If you are on Section 8, not Public Housing. HCVP participants must either be home, have someone age 18 or older or their landlord or representative there.

159 Ch 13

RAB Q: Was mine ok?

LMHA A: I don't know because I don't have it right in front of me. This was regarding the RFTA.

9-5

RAB Q: Are those the ones on Colorado?

LMHA A: No, that's public housing. You can't use Section 8 at a Public Housing property. Other properties LMHA owns that aren't public housing and can be leased by someone with a voucher. The PHA-owned properties are on Albany and Veranda Rose.

RAB Q: Are you doing inspections every 2 years?

LMHA A: Not yet. We have some things we need to do first but we can when we're ready because we put that in our plan last year.

RAB Q: Do you do a move-out inspection?

LMHA A: No, the landlord does that.

11-9

RAB Q: You won't count my income if I start working?

LMHA A: Not until your annual if it's reported on time, within 10 business days.

REVIEW OF PROGRESS IN LMHA'S 2017-2018 CAPITAL FUND PROGRAM (CFP) BUDGET AND PROPOSED 2019 CFP BUDGET AND 5-YEAR ACTION PLAN

RAB Q: Albright would rather have new refrigerators than new ACs.

LMHA A: I'll note that; it is in the 2019 CFP. Page 3 of 5 lists plan to replace 50 refrigerators at Albright.

RAB Q: Harr & International are always forgotten.

LMHA A: They are a different funding source that does not receive capital funds. However, they recently replaced electrical boxes. International is complete and the Harr project will be done mid-February.

RAB Q: The electrical project at International was sloppy.

LMHA A: I'll check on that. It may not look pretty but it's within safety codes. There were some changes with installation on the different floors due to structural differences.

RAB Q: International's parking lot needs restriped and sealed.

LMHA A: I will note that for both Harr and International.

RAB Q: What about the Lakeview safety grant timeline?

LMHA A: It has to be obligated by September 2019. We are hiring an engineer to review the number of cameras, DVR, etc. The cost for the engineer will not be paid out of the grant. We are looking at applying for the safety grant for other buildings for upcoming years.