

<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

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

**Definitions.**

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

<b>A.</b>	<b>PHA Information.</b>
A.1	<p>PHA Name: <u>Lorain Metropolitan Housing Authority</u> PHA Code: <u>OH012</u>  PHA Type: <input checked="" type="checkbox"/> High Performer  PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/22</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>3,141</u>  Total Combined <u>4,579</u>  PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>LMHA posts the Annual PHA plan, the Five-Year Plan, and the Capital Fund Program 5-Year Action Plan elements on its website at <a href="http://www.lmha.org">www.lmha.org</a>. Plans are also available at the LMHA Main Office, 1600 Kansas Avenue, Lorain, OH 44052 and at all administrative and property management offices:</p> <ul style="list-style-type: none"> <li>o LMHA (formerly LMHA’s procurement office) 1604 Kansas Avenue, Lorain, OH 44052</li> <li>o Leavitt Homes 2153 Lorain Drive, Lorain, OH 44052</li> <li>o Kennedy Plaza 1730 Broadway, Lorain, OH 44052</li> <li>o Lakeview Plaza 310 W. 7<sup>th</sup> Street, Lorain, OH 44052</li> <li>o Southside Gardens 3010 Vine Ave., Lorain, OH 44055</li> <li>o Albright Terrace 129 Milan Ave., Amherst, OH 44001</li> <li>o John Frederick Oberlin Homes 138 South Main St., Oberlin, OH 44074</li> <li>o Wilkes Villa 104 Loudon Court, Elyria, OH 44035</li> <li>o Riverview Plaza 310 East Ave., Elyria, OH 44035</li> <li>o Harr Plaza 15 Chestnut Street, Elyria, OH 44035</li> <li>o International Plaza 1825 Homewood Drive, Lorain, OH 44055</li> </ul> <p>LMHA provides the Plans to its resident councils.</p> <p>To obtain additional information on the policies contained in the Annual Plan, visit <a href="http://www.lmha.org/about-lmha/">http://www.lmha.org/about-lmha/</a> and select either “Annual Reports and Audits” or “LMHA Policies”. For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750.</p>

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

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

**B. Plan Elements**

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

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

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

**B. 1a 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))

Since the last Annual Plan submission, LMHA was awarded 42 Emergency Housing Vouchers to assist families who were homeless or at risk of being homeless during the COVID-19 pandemic. This award enabled LMHA to engage further with the CoC to address the needs of families that are homeless or at risk of being homeless. LMHA is working with the CoC to link families with necessary support and working on outreach and engagement with Lorain County landlords to increase housing choice for voucher holders. LMHA continues to review how to best serve the need for targeted resources to meet the needs of these individuals and families.

At the end of calendar year 2021, nearly 75% of applicants for LMHA’s housing programs were at or below the Extremely Low Income (ELI) level. Approximately 86% of public housing residents, 95% of multifamily residents, and 79% of participants in HCVP are ELI. For comparison, approximately 15% of families in Lorain County are ELI. Approximately 21% of the public housing households (290) have zero annual income. This demonstrates that LMHA housing programs are providing housing for the neediest residents of Lorain County. <sup>1</sup>Source for Lorain County statistics: <https://data.census.gov/cedsci/table?q=Lorain%20County,%20Ohio&t=Income%20and%20Poverty%3APoverty&tid=ACST1Y2019.S1701>

Approximately 38% of LMHA applicants for PH, Multifamily, and HCVP are elderly families or families with disabilities. In public housing, if an accessible unit is vacant, that unit will be offered to the first family that needs the features of the unit, even if the family is not at the top of the waiting list. If an applicant or current family does not need the accessibility, LMHA contacts agencies who serve persons with disabilities to advise them of the availability of such units.

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

LMHA responds to requests for reasonable accommodations for modifications to units or transfers to appropriate units to ensure that the household member has full access to live in the apartment without limitations. LMHA processed more than 611 requests for Reasonable Accommodations annually for all housing programs in calendar year 2021.

LMHA administers 175 vouchers for persons who are Non-Elderly Disabled (NED), 117 Veterans Affairs Supportive Housing (VASH) vouchers and are housing 9 persons via the Foster Youth to Independence (FYI) initiative. LMHA had 13 referrals in 2021.

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.

LMHA continues to see a greater need for accessible units in all bedroom sizes. To address this need, LMHA's intends to pursue redevelopment for Wilkes Villa and Southside Gardens include designs for approximately 10% of the units to be fully mobility accessible and for all units to be visitable, i.e., constructed utilizing principles of universal design. A prototype of this design was completed and leased up in 2017 at Southside Gardens. The building consists of 3 units: 3-bedroom accessible flat; 2-bedroom townhouse; 5-bedroom townhouse with the first floor being accessible.

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

The City of Elyria Consolidated Plan identifies housing issues, homelessness, and other special needs as priorities.

The plan is available at: <https://www.cityofelyria.org/wp-content/uploads/2021/03/HUD-Consolidated-Plan-5-Year-Strategic.pdf>; the current 2021-2022 Action Plan, currently available only in draft form, is available at: <https://www.dropbox.com/s/hu1oufo8hkxq1ks/City%20of%20Elyria%20Draft%202022%20AAP.pdf?dl=0>

LMHA's Annual and Capital Fund Program 5-Year Action Plans are consistent with the City's identified goals and objectives as to support housing issues, homeless, and other special needs as follows:

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

Goal/Strategy:

Housing Rehabilitation: Rehabilitate the existing owner-occupied and rental housing stock in the city. LMHA is proposing to rehabilitate units as needed, including, but not limited to the following: bath/plumbing, appliances, furnace replacement, electrical, light replacement, doors, windows, and radon testing.

Housing Construction: Increase the supply of affordable, decent, safe, accessible, and sanitary housing through new construction. LMHA is proposing to construct new housing units at Wilkes Villa which will include multiple bedroom units. The design will also integrate full mobile accessibility for approximately 10% of the units and for all units to be visitable.

Home Ownership: Assist low- and moderate-income households to become homeowners through credit counseling, housing counseling and financial incentives. LMHA provides homeowner counseling services. The Authority maintains a Housing Choice Voucher Program. LMHA also continues to work with current households to raise their incomes.

*Homeless Priority: There is a need for housing opportunities and services for homeless persons and persons at-risk of becoming homeless.*

Goal/Strategy:

Housing Support: Support local agencies efforts to provide emergency shelter, transitional housing, and permanent supportive housing. LMHA provides affordable housing to families/individuals at the extremely low-income range. LMHA continues to work with community partners to identify specific target populations to be served through project-based vouchers. The Authority will also issue project-based vouchers to eligible developer(s) who assist homeless persons or who have more disabling conditions that complicate a person's ability to find and maintain housing.

Housing Development: Support the development of housing for the homeless and disabled by nonprofit organizations and governmental agencies. LMHA provides affordable housing to those at risk for becoming homeless. LMHA is proposing to increase the number of units that are handicap accessible with a goal of establishing at least 72 mobility accessible public housing units. Further, LMHA has exceeded its goal of having 2%, or 29, units for persons with sensory impairments. LMHA has 396 (28%) of its public housing units accessible for persons with sensory (hearing) impairments.

*Other Special Needs Priority: There is a need for housing opportunities, services, and facilities for persons with special needs.*

Goal/Strategy:

LMHA is proposing to increase the number of units to those with special needs in the 5-year plan. In addition, LMHA's Project based Voucher Program is supporting the development of additional supportive housing.

Housing: Increase the supply of decent, safe, accessible, and sanitary housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation, new construction, and reasonable accommodation. LMHA will continue its efforts to rehabilitate construct and provide reasonable accommodations, as provided throughout the plan.

*Public Service Priority: There is a need to support social services, programs, and facilities for the elderly, persons with disabilities, the homeless and persons with other special needs.*

Goal/Strategy:

Public Service: Support programs for the elderly and disabled, social service programs, emergency shelter, transitional housing, and permanent supportive housing. LMHA will enhance the provision of services to residents, applicants, and the public.

LMHA's Annual and Capital Fund Program 5-Year Action Plans also consistent with the City of Lorain's Consolidated Plan goals to improve the availability and accessibility of affordable housing for persons of low and moderate income in Lorain and to reduce homelessness.

Plan is located at: <https://www.cityoflorain.org/DocumentCenter/View/3132/Five-Year-Consolidated-Plan-20202021-20242025-and-Annual-Action-Plan-Program-Year-2020-2021>

LMHA's mission and specialty is the provision of safe, decent, affordable housing for persons of low-income in Lorain County. Lorain's primary housing problem is affordability, and LMHA's housing programs are tailored to that problem for general populations, elderly persons, and persons with disabilities.

LMHA is reviewing its portfolio and exploring collaborations with the City of Lorain to redevelop Southside Gardens (Lorain) and the City of Elyria to develop Wilkes Villa (Elyria). Redevelopment 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 and the City of Elyria in regard to proposed projects and LMHA policies.

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

<b>Housing Needs of PUBLIC HOUSING (PH) APPLICANTS ACTIVE on Waiting List<sup>3</sup></b>			Statistics for Lorain County Households <sup>1,2</sup>
<b>NOTE: LMHA is currently accepting PH applications for bedroom sizes 0, 1, 2, 3, 4, 5, and 6.</b>	# of Families	% of Total Families	
<b>Totals as of December 31, 2021</b>	155	100%	300,670
Extremely low income (<=30% AMI)	117	75%	
Very low income (>30% but <=50%AMI)	26	17%	7%
Low Income (>50% but <80% AMI)	13	8%	
Families with children <sup>4</sup>	90	58%	42%
Elderly families	7	5%	26%
Families with Disabilities	29	19%	15%
Female HOH	133	86%	51%
Hispanic	63	41%	11%
White	79	51%	86%
Black/African American	57	37%	7%
American Indian/Alaska Native	4	3%	0%
Asian	0	0%	0%
Native Hawaiian/other Pacific Islander	1	1%	0%
Multi-racial	5	3%	4%

**Housing Needs of PUBLIC HOUSING (PH) APPLICANTS not yet processed for eligibility<sup>5</sup>**

<b>Totals as of December 31, 2021</b>	163	100%
Female HOH	116	71%
Hispanic	43	26%
White	80	49%
Black/African American	61	37%
American Indian/Alaska Native	2	1%
Asian	0	0%
Native Hawaiian/other Pacific Islander	1	1%
Multi-racial	4	2%
Not reported	15	9%

**Housing Choice Voucher / Waiting List Statistics**

Totals 12/31/2021	# of Families	% of Families	Statistics for Lorain County Households
Totals	94	100%	120,299
Extremely low income	68	72%	9.4%
Very Low Income	23	24%	16.1%
Low Income	2	2%	14.05%
Families with children	55	59%	69%
Elderly families	6	6%	29%
Families with disabilities	18	19%	13.3%
Female HOH	86	91%	13%
Hispanic	36	38%	14%
White	52	55%	86%
Black/African American	34	36%	9%
American Indian/Alaska Native	0	0%	0.4%
Asian	0	0%	1.4%
Native Hawaiian/other Pacific Islander	1	1%	0.10%
Multi-racial	5	5%	3.4%
Not reported	2	2%	0%

**Housing Needs of MULTIFAMILY HOUSING (Harr/International Plazas) APPLICANTS ACTIVE on Waiting List<sup>3</sup>**

NOTE:	# of Families	% of Total Families	Statistics for Lorain County Households <sup>1,2</sup>
<b>Totals as of December 31, 2021</b>	25	100%	300,670
Extremely low income (<=30% AMI)	22	88%	
Very low income (>30% but <=50%AMI)	2	8%	7%
Low Income (>50% but <80% AMI)	1	4%	
Elderly/Near Elderly families	22	88%	26%
Families with Disabilities	21	84%	15%
Female HOH	18	72%	51%
Hispanic	7	28%	11%
White	12	48%	86%
Black/African American	10	40%	7%
American Indian/Alaska Native	1	4%	0%
Asian	0	0%	0%
Native Hawaiian/other Pacific Islander	0	0%	0%
Multi-racial	0	0%	4%
Not reported	2	8%	4%

**Housing Needs of MULTIFAMILY HOUSING APPLICANTS not yet processed for eligibility<sup>4</sup>**

<b>Totals as of December 31, 2021</b>	39	100%
Female HOH	17	44%
Hispanic	11	28%
White	23	59%
Black/African American	12	31%
American Indian/Alaska Native	2	5%
Asian	0	0%
Native Hawaiian/other Pacific Islander	0	0%
Multi-racial	0	0%
Not reported	2	5%

**Housing statistics of current LMHA families**

<b>Total Public Housing Families (12/31/2021)</b>	1413	100.0%
Disabled HOH	516	37%
Elderly HOH	196	14%
Hispanic	416	29%
Non-Hispanic	997	71%
Female HOH	1022	72%
Male HOH	391	28%
White	821	58%
Black/African American	538	38%
American Indian/Alaska Native	13	1%
Native Hawaiian/Other Pacific Islander	7	0%
Asian	1	0%
Multi-Racial	33	2%
Extremely low income (ELI)	1211	86%
Very low income (VLI)	142	10%
Low Income (LI)	49	3%
High Income	11	1%
Average Household Income	\$12,312.19	

**Housing Choice Voucher Active**

<b>Total HCVP Families (12/31/2021)</b>	3,526	100%
Disabled HOH	1,306	37%
Elderly HOH	631	18%
Hispanic	1,004	28%
Female HOH	2,987	85%
Male HOH	545	15%
American Indian / Alaska Native	27	1%
Asian	1	0%

Black / African American	1,548	44%
Multi-Racial	37	1%
Native Hawaiian / Other Pacific Islander	63	2%
White	1,851	52%
Extremely Low Income (ELI)	2,780	79%
Very Low Income (VLI)	454	13%
Low Income (LI)	76	2%
High Income	8	0%
Income Level Undefined	214	6%
Average Household Income	\$12,378.64	

Total Multifamily Housing Families (Harr and International Plazas) (12/31/19)		
	199	100.0%
Disabled HOH	180	90%
Elderly HOH	76	38%
Hispanic	41	21%
Non-Hispanic	158	79%
Female HOH	94	47%
Male HOH	105	53%
White	137	69%
Black/African American	57	29%
American Indian/Alaska Native	2	1%
Native Hawaiian/Other Pacific Islander	1	1%
Asian	0	0%
Multi-Racial	2	1%
Extremely low income (ELI)	190	95%
Very low income (VLI)	9	5%
Low Income (LI)	0	0%
High Income	0	0%
Average Household Income	\$11,369.64	

B. 1b

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

**Deconcentration Policy of Lorain Metropolitan Housing Authority**

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

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

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

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

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

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

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

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

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

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

Board resolution 8402-99; 6-16-99

#### **Deconcentration Analysis and Statistics**

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

#### **Historical Data**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## Current Data – Calendar Year 2021

In calendar year 2021, the EIR range was \$11,547.97 to \$15,623.73 with the average family income PHA wide of \$13,585.85.

There were 4 properties with average family incomes below EIR:

- Lakeview (1,236.41 below EIR) with 36 households (17.5%) having zero income
- Leavitt Homes (239.51 below EIR) with 38 households (19.2%) having zero income
- Westview Terrace (1,266.71 below EIR) with 32 households (23.4%) having zero income
- Wilkes Villa (2,320.97 below EIR) with 49 households (28.5%) having zero income

LMHA is developing strategies to target these properties for investment and capital improvement. As Wilkes Villa has the greatest need for capital improvement it is being prioritized for such revitalization. LMHA is investing in security improvements in 2022. Other strategies for these properties may include LIHTC, RAD, and revitalization through other potential funding sources such as Choice Neighborhoods or local funds. Wilkes Viall, as well as Leavitt, Westview, and Lakeview. LMHA is engaged with the City of Elyria and recently met with Mayor Whitfield to discuss planning and community impact. The City of Elyria is reviewing the potential for being a lead applicant in a Choice Neighborhoods Initiative Program application.

No properties were above EIR

In 2021 80.12% of applicants for public housing were ELI; 17.64% 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 83.36% of the public housing households being ELI, 17.64% 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.

## Strategies to Increase Household Income

LMHA will reexamine existing obstacles preventing our families from increasing household income. LMHA has reengaged with United Way and other Lorain County agencies and nonprofits to address core issues affecting income and employment. A key area of focus is the lack of public transportation in the county. LMHA is reorganizing its Resident Services program to increase engagement and resident events across its family sites, especially Wilkes Villa. Enhancing resident engagement opportunities will not only allow us to gain insight into these barriers, but it will also allow us to link our families with resources needed to surpass present economic circumstances. Partnering with our local workforce development agency, educational institutions, and transportation services, in addition to collaborating with our neighboring, non-profit, charitable organizations, will allow us to address barriers by connecting our residents to the empowering programming needed to grow household income. LMHA will further improve family access to equitable opportunities for success by continuing to offer HUD programming such as FSS, Housing Counseling and Homeownership programs.

## Summary of Policies Governing Eligibility, Selection, and Admission

### Waiting List Procedures

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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.

**Operation and Management**

The guiding documents for LMHA’s rules, standards, and policies for the maintenance and management of housing owned, assisted, or operated by LMHA are the ACOP and Admin Plan.

**Grievance Procedures**

LMHA Grievance procedures are set out in Chapter 14 of the ACOP. There are no changes.

**Community Service and Self-Sufficiency Programs**

LMHA operates the HUD Family Self-Sufficiency (FSS) program in an effort to empower residents toward self-sufficiency. Each program has specific goals and requirements but are all designed to provide access to supportive services and necessary resources to assist residents in increasing their economic position. LMHA is updating its FSS Policy to comply with new regulations. It will be presented to the Board for approval in September 2022. LMHA will apply for a ROSS (Resident Opportunity and Self Sufficiency Coordinator) grant in 2022.

**Asset Management**

The total 2022 ACC unit count is 1,438 for the Public Housing program. LMHA is not seeking RAD approval.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

B.1c

**Financial Resources**

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

Financial Resources - Expended on eligible purposes.	
1	Federal Grants - Current
	Public Housing Operating Fund \$7,855,947.00
	Public Housing Capital Fund \$3,484,216.00
	HOPE VI Revitalization \$0.00
	HOPE VI Demolition \$0.00
	Annual Contributions for Section 8 Tenant Based Assistance \$24,252,291.00
	Resident Opportunity and Self-Sufficiency Grants \$138,131.00
	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) \$6,062,661.00
3	Public Housing Dwelling Rental Income \$2,219,422.00
	<u>\$44,012,668.00</u>

Financial Resources have increased to include Emergency Housing Voucher (EHV) funding. LMHA began receiving EHV funding in 2021. The Financial Resources have been revised to include current levels of EHV Funding.

**B.1.d**

**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 has not made any changes to Rent Determination.

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

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

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

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

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

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

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

### **Minimum Rents**

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

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

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

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

Payment standards are set at 95% of the FMR.

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

### **Flat Rents**

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

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

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

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

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

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

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

### **Flat Rent Policies – How to comply on an annual basis**

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

1. Compare the current flat rent amount to the applicable FMR and SAFMR/unadjusted rent. If the PHA is in compliance with this the law, no further steps are necessary:
  - a) If the flat rent is at least equal to the lower of:
    - a. 80 percent of the FMR, or

b. 80 percent of the SAFMR (or if no SAFMR is available, 80 percent of unadjusted rent).

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **Mixed Families**

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

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

The 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

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

There are no changes to LMHA's Admissions and Continued Occupancy Policy.

**HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE POLICY CHANGES**

There are no changes to LMHA’s Housing Choice Voucher Program Administrative Policy.

**B.1.e**

**Homeownership Programs**

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

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

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

In order to maintain our HUD approved status, LMHA must have 30 clients participating in housing counseling and education classes each year. In 2021, the program had:

- 123 families participate in counseling and education activities
- 71 complete pre-purchase homebuyer / financial literacy education workshop
- 39 receive one-on-one counseling for pre-purchase/home buying
- 12 receive one-on-one counseling for home maintenance and financial management for homeowners
- 1 receive one-on-one counseling for resolving or preventing mortgage delinquency or default

**B.1.f.**

**Safety and Crime Prevention**

Safety and Crime Prevention Since the LMHA’s last Annual submission, LMHA has reorganized and streamlined its Safety and Crime Prevention procedures. Through reorganization, LMHA created a Security Director position and transitioned to in-house security positions. LMHA hired both full time and part time security guards. Assignments are reviewed continually to maximize security services as needed. COVID-19 has impacted hiring for all positions and LMHA continues to advertise and interview for security positions.

The Elyria Police Department (EPD) received a \$25,000 for the 2021 Project Safe Neighborhood grant enabling them to increase presence at LMHA sites and develop resident engagement. LMHA coordinates resident meetings with the EPD. The number of meetings and engagement has been affected by COVID-19 restrictions and infections in both EPD and LMHA staff throughout 2021.

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, **388, or 6.23%, of the 6,231 cases** occurred among the 948 housing units in Lorain. (In 2020, there were 182, or 5.91%, of the 3,082 reports. In 2019, there were 452, or 6.8%, of 6,626 reports. In 2018, there were 356, or 5%, of 7,023 reports.) Statistics from the Elyria Police Department show that of all the police calls for service in the city of Elyria, **4,781, or 14.14%, of the 33,792 calls** for service occurred among the 452 housing units in Elyria. (In 2020, 57, or 3.7%, of the 1,521 calls. In 2019, there were 988, or 2.7%, of the 36,409 calls. In 2018, there were 160, or 3%, of 5,421 calls. In 2018, these statistics did not include all calls for service as accounted for in 2019 and 2020, but only police reports and criminal violations were counted.)

**Safety and Crime Prevention (VAWA)**

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 aid victims:

El Centro de Servicios Sociales Inc. 2800 Pearl Avenue Lorain, Ohio 44055 440.277.8235	Genesis House (Lorain County Safe Harbor) PO Box 718 Lorain, OH 44052 24-hour Hotline: 440.244.1853; 440.323.3400	Pathways Counseling & Growth Center 312 Third Street Elyria, OH 44035 440.323.5707
Mental Health, Addiction and Recovery Services (MHARS) Board of Lorain County 1173 North Ridge Road, East Lorain, OH 44055 440.233.2020 24/7 Emergency/Crisis Hotline: 800.888.6161	Nord Center 6140 South Broadway Avenue Lorain, OH 44053 24/7 Emergency/Crisis Hotline: 800.888.6161 Sexual Assault Services Hotline: 440.204.4359	Far West Center/Amherst 510 N. Leavitt Road Amherst, OH 44001 440.988.4900

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

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

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

#### **Pet Policy**

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

The pet policy is intended to establish clear guidelines for ownership of pets in Public Housing and to ensure that no applicant or resident is discriminated against regarding admission or continued occupancy because of ownership of pets. Individuals with disabilities may request to have an animal by submitting a Reasonable Accommodation as detailed within the ACOP.

LMHA Pet Policy is set out in Chapter 10 of the ACOP. It describes the type and number of pets allowed in LMHA's public housing units. Dogs and cats must be registered. Residents are also required to provide documentation signed by a licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration must be renewed annually and will be coordinated with the annual reexamination date. Two pet sponsors (named on the Pet Application) must be designated. These individuals agree to remove the pet from the premises should the resident become incapable of caring for the pet.

Only common household pets are permitted. LMHA has number and weight restrictions. There are no breed restrictions, however, Animals that pose a serious risk of harm are permitted.

There are no changes to LMHA's pet policy.

#### **B.1.e Statement of Substantial Deviation/Significant Amendment**

LMHA is requesting approval of changes to its Statement of Substantial Deviation/Significant Amendment. LMHA's previous Statement of Substantial Deviation/Significant Amendment required LMHA to go through public hearing process for changes above the cost threshold in the Capital Fund Program. The requested change is line with HUD's policy for that process to apply to proposed demolition, disposition, designation of housing, homeownership programs, development, or mixed-finance proposal.

#### **LMHA proposes to use the following as Statement of Substantial Deviation/Significant Amendment:**

The Lorain Metropolitan Housing Authority (LMHA) considers any of the following to be a substantial deviation from the Agency's Five-Year Plan and a significant amendment or modification to the Agency's Annual Plan. If any of the criteria are met, LMHA will submit a revised Plan that satisfies all public process requirements. Changes made to comply with new or revised HUD rules do not constitute significant deviation or modification from the Plans presently submitted. Revisions made to work items and activities contained in the Plan, to accommodate the loss of PFS subsidy or capital funds received from HUD as a result of inadequate appropriations, shall not be considered substantial deviation or significant modification from the present Plan.

#### **Agency Five Year Plan**

- Additions or deletions of strategic goals
- Revisions to the LMHA mission statement that deviates from the present commitments

#### **Agency Annual Plan and Capital Fund Program (CFP) Five-Year Action Plan**

- Any change to rent or admission policies or organization of waiting lists
- Any change, for purposes of the CFP, to a proposed demolition, disposition, designation of housing, homeownership programs, development, or mixed-finance proposal.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements since such changes are not considered significant.

This criterion does not supersede the requirements of OMB Circular No. A-87 (Cost Principal for State, Local, and Indian Tribal Governments) and 25 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements), as well as federal, state, or local regulations or statutes.

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

**B.2 New Activities.**

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

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Conversion of Public Housing to Tenant Based Assistance.
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Project Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

**Hope VI or Choice Neighborhoods, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion to Tenant-Based Assistance, Conversion of Public Housing to Project-Based Assistance Under RAD**

LMHA intends to conduct a Physical Needs Assessment in 2022 and is considering procurement of a Repositioning/Development consultant and Master Co-developer to assist in the consideration of strategies to best preserve its housing stock and pursue the creation of new housing resources for low-income families.

LMHA plans to consider all strategies noted in HUD's Repositioning of Assets Initiative, including, Choice Neighborhoods Initiative, demolition and/or disposition under Section 18, conversion of public housing to tenant-based assistance, RAD, and any combination of recapitalization strategies that should be considered to preserve hard units for the low-income families LMHA serves. LMHA is not seeking approval of RAD at this time.

LMHA has been in discussion with the City of Lorain regarding application for a Choice Neighborhood Planning Grant. LMHA and the City will make application for a Choice Neighborhood Planning Grant this year. The Grant was submitted on July 28, 2022.

**Project Based Vouchers**

LMHA issued an RFP for Project Based Vouchers in 2021. LMHA intends to award up to 200 PBVs through this RFP. LMHA will use PBVs as a strategy to deconcentrate poverty and provide program participants with access to units in neighborhoods of opportunity.

**Other Capital Grant Projects**

LMHA will pursue any additional grant opportunities for Other Capital Projects made available by HUD in the coming year.

**Public Housing ACOP**

LMHA will continue its review and updating of its public housing Admission and Continued Occupancy Policy (ACOP) in the coming year. In particular, LMHA will consider changes to its public housing lease.

**Administrative Plan for the Housing Choice Voucher Program**

LMHA will continue its review and updating of its Administrative Plan that governs the operation of the Housing Choice Voucher Program. LMHA intends to work with the Balance of State Continuum of Care and Lorain County Task Force for the Homeless to assess the need and impact of instituting a homeless preference for LMHA's HCV program. LMHA may pursue management of other housing choice voucher programs if opportunities become available.

**Units with Approved Vacancy for Modernization**

LMHA intends to request approval to renovate units in need of comprehensive renovations as they become vacant utilizing Capital Funds, which will result in units being placed in "Approved Vacancy for Modernization" status.



**B.3****Progress Report.**

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

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

LMHA intends to conduct a Physical Needs Assessment in 2022 with the goal of evaluating its portfolio for redevelopment of Southside Gardens and Wilkes Villa. During 2021 the City of Lorain engaged a consultant to pursue a Choice Neighborhood Initiative Planning Grant. Due to the multiple challenges of COVID-19, it was determined to defer the application. LMHA continues to engage with the both the City of Lorain and Elyria in discussions on CNI grant opportunities.

In calendar year 2021, LMHA completed \$465,785 in capital improvement projects agency wide. The COVID-19 pandemic affected all levels of capital planning and contracting. LMHA is focusing on addressing critical capital needs and expects expend significant capital funds in the next fiscal year.

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

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

The Authority shall continue its implementation and utilization of technologies to improve the productivity of staff, such as new software to gain insights from housing data, conference calling to reduce employee travel to meetings, and steps towards paperless technologies for applicants, tenants, participants, and employees.

Many of LMHA's goals are not just capital improvements listed in the PHA 5-Year Action Plan. LMHA established many goals and programs, often in collaboration with other social service agencies, governmental authorities, non-profit groups, and private entities, to enhance and improve the living environment and self-sufficiency of residents.

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

- LMHA awarded 64 Project Based Vouchers to EDEN, Inc. for a permanent supportive housing property being constructed in Elyria, Ohio; progress on the project known as Bridge Pointe Commons continues with the PBVS expected to be online by June 1, 2022
- LMHA housed 9 individuals via the Foster Youth to Independence (FYI) initiative. The FYI program targets housing assistance to young people aging out of foster care and who are at extreme risk of experiencing homelessness. The initiative offers housing vouchers to local PHAs to prevent or end homelessness among young adults under the age of 25 who are, or have recently left, the foster care system without a home to go to. There were 12 referrals in 2021. LMHA partners with Lorain County Children Services and Lorain County Continuum of Care to End Homelessness. For supportive services, LMHA partners with Catholic Charities, New Sunrise Properties for NSP tenants, Nord Center and LMHA's Family Self-Sufficiency program.
- LMHA will continue its collaboration with Lorain County in implementation of Tenant Based Rental Assistance (TBRA). In 2021, LMHA disbursed \$1,500 to assist 4 families with first month's rent or security deposits for voucher program participants residing outside the cities of Lorain and Elyria.

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

- LMHA awarded 64 Project Based Vouchers to EDEN, Inc. for a permanent supportive housing property being constructed in Elyria, Ohio. Progress on the project known as Bridge Pointe Commons continues with the PBVs expected to be online by June 1, 2022
- LMHA issued an RFP for Project Based Vouchers seeking to award up to 200 PBVs to support development of supportive and affordable housing
- LMHA completed \$ 465,785 in capital improvements for public housing properties; capital projects were delayed due to COVID-19 restrictions
- LMHA new executive administration engaged property management staff to review past planning and capital needs; information gathered from staff as well as current HQS and REAC inspections informed LMHA's 2022 Annual Plan, 2022 Five Year, and 2022 Five Year Action Plan
- LMHA completed 17,593 tenant requested work orders with an average completion time of 5.6 days

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

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

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

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

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

- Family Self Sufficiency (FSS) programming for LMHA public housing and HCVP residents
- HCVP Home Ownership Option Program
- Resident Service Coordinator on staff to connect the residents with social service agencies to address their needs
- Public Housing residents were assisted by the Service Coordinator via referrals, surveys, and hardship rent exemptions.
- The Resident Service Coordinator assisted by LMHA's Resident Services staff worked with Lorain County agencies and non-profits to connect residents and participants with Emergency Rental Assistance Funds
- The Resident Service Coordinator assisted by LMHA's Resident Services staff worked with Lorain County agencies, non-profits, State of Ohio Department of Aging, and other state agencies to provide COVID-19 vaccination opportunities to all its residents
- Resident Service Coordinator assists in mediation between Project Managers and residents to address matters of rent payment delinquency, community service, housekeeping, lease violations & minimum rent exemption applications
- The Resident Services Coordinator assisted by Executive and Resident Services staff review Resident Council organizational documents and procedures and determined that additional review and training for resident engagement and participation is needed; a Resident Council Training Program will be implemented in 2022 with the goal of fully trained and compliant resident councils and RAB operating under updated By-laws and MOUs
- Resident Services Department helps to establish and maintain Resident Councils in LMHA public housing properties and Resident Advisory Board consisting of public housing residents and HCVP participants
- Green Thumb flower and garden program has inspired residents to take an interest in the beautification of their homes and gardens and encourage planting of annual and perennial flowers plus urban vegetable gardens. More than 33 individuals participated in 2020 agency wide. Families also cared for community gardens located at Westview, Wilkes, and Southside.
- Computer labs are available at several LMHA public housing high rises giving residents computer and internet access to look for employment, complete online applications, send/receive emails, etc. Computer kiosks are also available in the LMHA main office lobby. However, due to the COVID-19 pandemic, access to the labs has been restricted since April 2020. LMHA is evaluating reopening based upon COVID-19 metrics.
- Resident Assistance Watch (RAW) programs to engage public housing residents in monitoring their properties. Residents can earn community service hours while participating. RAW membership is active at various LMHA high rises. Due to the COVID-19 pandemic, the program was suspended through May 2021 due to COVID-19. Beginning in May 2021 LMHA reopened its community rooms and recruitment and roll out of this program has been implemented.
- Presentations were provided by various speakers to discuss Medicare, Medicaid, and Fraud Awareness at dedicated senior engagement events.
- LMHA is a Certified Credit Counseling agency
- LMHA conducts Homebuyer's Education Classes which fulfills HUD Approved Pre-Purchase Housing Counseling
- Boys and Girls Club: On site at Westview Terrace provides childcare for children residing with the Housing Authority
- Boys and Girls Club: On-site at Southside Gardens provided childcare for 40 children, 1 of whom reside with the Housing Authority; services at Southside Gardens were suspended during 2021 related to COVID-19 challenges. Services were available to Southside Residents at a nearby agency.
- Domestic Violence Awareness task force in collaboration with the Genesis House
- Referrals made to a Mary Lee Tucker application center to provide clothing for families
- Lorain County Health and Dentistry operates a medical and dental center in Wilkes Villa for residents and the general public
- Horizon Day Care facility in Wilkes Villa provides day care to residents and employment opportunities. As of December 31, 2021, there were 42 children who reside at Wilkes Villa served by/enrolled at Horizon.
- In partnership with Horizon Education Center and the Boys and Girls Club of Lorain County, and other Lorain County non-profit providers the USDA Summer Food Program provides children with breakfast and lunch at Wilkes Villa, Leavitt Homes, Westview Terrace, and Southside Gardens.
- Offer Financial Assistance for Education to assist residents to improve work skills and achieve individual and educational goals
- Publishes a bi-monthly newsletter to keep public housing residents informed on available housing and community programs
- Binders with community resource information are accessible to public housing residents through each development's Management office
- Residents at various LMHA properties are offered twice-monthly shuttle services to local supportive service agencies and shopping locations
- In collaboration with local supportive and faith-based organizations, holiday meals were provided to residents throughout LMHA properties
- LMHA participated in the Tenant Based Rental Assistance (TBRA) program for HCVP participants to assist with security deposits & utilities distributing \$13,500 to assist 26 families
- Lorain County Homeless Task Force
- Lorain County Goodwill: Job Club
- Ohio Means Jobs: Employment Opportunities
- Catholic Charities: Resources
- Lorain County Health and Dentistry is on-site at Wilkes Villa and also located close to Lakeview Plaza, Kennedy Plaza, and John Frederick Oberlin Homes
- High rise residents were served holiday food boxes through a partnership with Salvation Army at Riverview and Harr Plaza
- As part of the Little Free Library Initiative, 4 LMHA Public Housing properties have Little Free Libraries on site stocked with books to promote literacy and the love of reading
- Second Harvest provided Housing Authority tenants at Riverview, Kennedy, International, and Harr Plazas with monthly Senior Food Boxes
- During the summer of 2021, Our F.A.M.I.L.Y. distributed over 2,700 meals and snacks to Wilkes Villa residents.
- Invest Elyria assists families, individuals, senior citizens through the food pantry that is located at Wilkes Villa; as supplies are available Invest Elyria also offers necessity items through there pantry
- LMHA distributed backpacks stuffed with school supplies at Leavitt Homes, Westview Terrace, Wilkes Villa, Southside, & Oberlin Homes.
- LMHA collaborated with the Lorain Public Library to distribute tablets and hot spots to help children attend their online virtual schooling.
- LMHA collaborated LCCAA to distribute coats to children at Leavitt Homes, Westview Terrace, Wilkes Villa, Southside Gardens, and Oberlin Homes

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

- Retrofit units with desired accessible features for residents who request accommodations

- LMHA reviewed 611 requests for reasonable accommodations in 2021

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

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

LMHA's Public Housing FSS program statistics for January 1, 2021, thru December 31, 2021:

- 69 current PH FSS participants
- 14 new participants added
- 9 graduated with final escrow disbursements totaling \$48,255.51
- 57 have positive escrow accounts totaling \$114,060.34
- 11 new escrow accounts established this year
- 10 increased their escrow deposits due to higher earned income
- 61 are employed
- 33 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 3 continue to work on General Education Diploma (GED)
- 16 are enrolled in college
- 27 have earned a degree or certification
- 1 earned their LPN
- Highest Disbursement check total \$16,859.54

LMHA's Housing Choice Voucher FSS program statistics for January 1, 2021, thru December 31, 2021:

- 71 current HCV FSS participants
- 24 new participants added
- 16 graduated with final escrow disbursements totaling \$72,602.57
- 34 have positive escrow accounts totaling \$80,513.83
- 21 new accounts established this year
- 9 increased their escrow deposits due to higher earned income
- 52 are employed
- 27 have been employed more than a year
- 0 participants receive Temporary Assistance to Needy Families (TANF) Cash Assistance
- 3 continue to work on their General Education Diploma (GED) (2 in 2021)
- 12 are enrolled in college
- 15 have associate degrees (2 earned in 2021)
- 1 has a bachelor's degree
- Highest Disbursement check total \$29,189.16

**Homeownership Programs**

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

LMHA's Housing Choice Voucher Home Ownership Program has 89 active participants and has assisted 193 participants to purchase homes since the program's inception in 2002. Eight (8) participants became new homeowners in 2021. LMHA has a goal of seven (7) new homeowners in 2022.

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

In order to maintain our HUD approved status, LMHA must have 30 clients participating in housing counseling and education classes each year. In 2021, the program had:

- 123 families participate in counseling and education activities
- 71 complete pre-purchase homebuyer / financial literacy education workshop
- 39 receive one-on-one counseling for pre-purchase/home buying
- 12 receive one-on-one counseling for home maintenance and financial management for homeowners
- 1 receive one-on-one counseling for resolving or preventing mortgage delinquency or default

**Outcomes for Housing Counseling**

- 49 Households that received one-on-one counseling that also received group education services.
- 49 Households that received information on fair housing, fair lending and/or accessibility rights.
- 52 Households for whom counselor developed a sustainable household budget through the provision of financial management and /or budget services

	<ul style="list-style-type: none"> <li>• 32 Households that improved their financial capacity (e.g., increased discretionary income, decreased debt load, increased savings, increased credit score) after receiving Housing Counseling Services.</li> <li>• 8 Household that gained access to resources to help them improve their housing situation (e.g., down payment assistance, rental assistance, utility assistance, etc.) after receiving Housing Counseling Services.</li> <li>• 7 Households that received pre-purchase /home buying counseling and purchased housing after receiving Housing Counseling Services</li> </ul> <p><b><u>Goal #6: Promote and market LMHA’s owned and managed affordable housing in Lorain County, to include Public Housing, Multifamily housing, and the Housing Choice Voucher Program</u></b></p> <ul style="list-style-type: none"> <li>• LMHA advertised through a variety of diverse daily and monthly publications and media, such as traditional newspapers, radio advertisements, ethnic publications, and coupon programs to ensure residents of Lorain County are aware of the availability of affordable housing without discrimination</li> <li>• LMHA expanded its of social media outlets (Facebook, text message blasts, email blasts, message boards, website) to better communicate agency news and events to residents and the community</li> <li>• LMHA printed and emailed newsletters for its residents and participants</li> <li>• LMHA improved engagement with local government entities and community partners to improve access to all LMHA programs</li> </ul> <p><b><u>Goal #7: Enhance the safety of the living environment for public housing residents</u></b></p> <ul style="list-style-type: none"> <li>• Continue to provide protective services at various properties as funds are available</li> <li>• Transitioned from vendor security services to in-house staff</li> <li>• Provide above baseline police protection services at public housing properties and multifamily properties as funds are available</li> <li>• Engaged with the Lorain Police Department and the Elyria Police Department in planning for security camera capital projects at all LMHA sited</li> <li>• Continue to encourage residents to report suspicious or criminal activity observed at their properties</li> <li>• Implement alternative methods of reporting criminal or suspicious activity, such as text messaging, emailing, voicemail, or online reporting capabilities</li> <li>• Coordinated resident engagement at Wilkes Villa with the Elyria Police Department (EPD) under the Project Safe Neighborhood grant; the number of meetings and engagement has been affected by COVID-19 restrictions and infections in both EPD and LMHA staff throughout 2021.</li> </ul> <p><b><u>Goal #8: Explore and Implement Green Initiatives</u></b></p> <ul style="list-style-type: none"> <li>• Continued review and implementation of lighting improvements throughout LMHA</li> <li>• Reduced the amount of paper consumed through use of TenDocs digital files, DocuSign, Adobe sign and email of documents</li> <li>• Made progress in implementing electronic applicant files</li> <li>• Continuing purchase of only Energy Star appliances (refrigerators and air conditioners at several properties)</li> <li>• Utilized low/no-VOC paints and sealants</li> <li>• Because of the COVID-19 pandemic, meetings and hearings were held via Zoom and conference calls</li> <li>• Planned upgrades to virtual connection to community rooms to maximize resident engagement during COVID-19 and to facilitate future engagement for all residents and participants</li> </ul> <p><b><u>Goal #9: Ensure Equal Opportunity and Affirmatively Further Fair Housing</u></b></p> <ul style="list-style-type: none"> <li>• Developed annual Fair Housing Training and Reasonable Accommodation training plan for all employees, with some being tailored to specific personnel, such as maintenance staff, receptionists, management, inspectors, case workers, etc.</li> <li>• Conducted annual training in Reasonable Accommodations.</li> </ul> <p><b><u>Goal #10: Promote deconcentration</u></b></p> <ul style="list-style-type: none"> <li>• During orientations, promote benefits of living in areas of Lorain County outside of the areas of high poverty by highlighting housing opportunities, services, employment opportunities and amenities</li> <li>• Increase affordable housing choices by assessing low poverty areas and modifying voucher payment standards</li> <li>• Supported portability by allowing families the opportunity to move outside of areas of poverty</li> <li>• Encouraged the use of <a href="http://www.gosection8.com">www.gosection8.com</a> where families may seek housing via the internet</li> <li>• LMHA executive staff planned for in person HCV Landlord engagement events dependent on COVID-19 restrictions or trends; first in-person event is planned for September, 2022.</li> </ul>
<b>B.4.</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. See <b>Capital Fund 2022-2026 5 Year Action Plan in EPIC approved by HUD on August 25, 2022</b></p>
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y   N  <input type="checkbox"/> <input checked="" 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>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD-50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
<b>C.3</b>	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><a href="#">Form 50077-ST-HCV-HP</a>, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y   N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>	
<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>	
<b>D.1</b>	<p><b>Affirmatively Furthering Fair Housing.</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="180 1402 1451 1837"> <tr> <td data-bbox="180 1402 1451 1837"> <p><b>Fair Housing Goal:</b></p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHAs are not required to submit an Assessment of Fair Housing following HUD’s suspension of its Affirmatively Furthering Fair Housing (AFFH) rule in 2018. LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> <li>• Promote lower rates of crime through engagement with local police departments efforts on community policing</li> <li>• Support and promote affordable and accessible housing</li> <li>• Annual training for staff on Fair Housing and Reasonable Accommodation Law</li> <li>• Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action</li> </ul> </td> </tr> </table>	<p><b>Fair Housing Goal:</b></p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>PHAs are not required to submit an Assessment of Fair Housing following HUD’s suspension of its Affirmatively Furthering Fair Housing (AFFH) rule in 2018. LMHA continues to focus on the following goals:</p> <ul style="list-style-type: none"> <li>• Promote lower rates of crime through engagement with local police departments efforts on community policing</li> <li>• Support and promote affordable and accessible housing</li> <li>• Annual training for staff on Fair Housing and Reasonable Accommodation Law</li> <li>• Updated LMHA procedure for tabulating and tracking all requests for accommodations to insure prompt review and action</li> </ul>
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	<b>Fair Housing Goal:</b>
	<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>

	<b>Fair Housing Goal:</b>
	<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>

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

## A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

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

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

## B. Plan Elements.

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

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

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income, and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

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

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

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

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

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

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

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

- **Significant Amendment/Modification.** PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

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

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

**HOPE VI.** 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6) . ([Notice PIH 2011-47](#))

**Mixed Finance Modernization or Development.** 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD’s website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). ([24 CFR §903.7\(h\)](#))

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

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

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

**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).

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

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7 \(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

## C. Other Document and/or Certification Requirements

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

**C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and



contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

#### **D. Affirmatively Furthering Fair Housing.**

##### **D.1 Affirmatively Furthering Fair Housing.**

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks, as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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

Public reporting burden for this information collection is estimated to average 7.02 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.

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

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

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 2022-2026 5-Year and/or 2022 Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 7/2022, in connection with the submission of the Plan and implementation thereof:*

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



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

Lorain Metropolitan Housing Authority

OH012

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2022

5-Year PHA Plan for Fiscal Years 2022- 2026

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

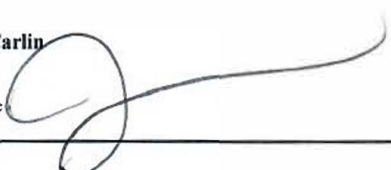
Name of Executive Director

Name Board Chairman

Judith Carlin

Evelyn C. France

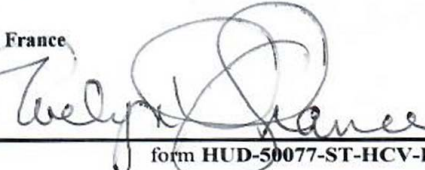
Signature



Date

4-27-22

Signature



Date

4-27-22

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The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.