Annual PHA Plan (Standard PHAs and Troubled PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB No. 2577-0226 Expires: 03/31/2024

DRAFT 1/30/25

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

Definitions.

- (1) High-Performer PHA A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, 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.

Α.	PHA Information.			
A.1	Lorain Metropolitan Housing Authority OH012 PHA Name: PHA Code:			
	PHA Type: Standard PHA Troubled PHA			
	PHA Plan for Fiscal Year Beginning: (MM/YYYY): 7/1/2025			
	PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)			
	Number of Public Housing (PH) Units 1,438 Number of Housing Choice Vouchers (HCVs) 3,171			
	Total Combined Units/Vouchers 4,609			
	PHA Plan Submission Type: ☐ Annual Submission ☐ Revised Annual Submission			
	Availability of Information. 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. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AM and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are a encouraged to provide each resident council a copy of their PHA Plans. LMHA posts the Annual PHA plan, the Five-Year Plan, and the Capital Fund Program 5-Year Action Plan elements on its website at www.lmha.org . Plans are also available at the LMHA Main Office, 1600 Kansas Avenue, Lorain, OH 44052 and at all administrative and property managements.			
	offices:			
	 LMHA (formerly LMHA's procurement office) 1604 Kansas Avenue, Lorain, OH 44052 			
	 Leavitt Homes 2153 Lorain Drive, Lorain, OH 44052 			
	o Kennedy Plaza 1730 Broadway, Lorain, OH 44052			
	o Lakeview Plaza 310 W. 7th Street, Lorain, OH 44052			
	 Southside Gardens 3010 Vine Ave., Lorain, OH 44055 Albright Terrace 129 Milan Ave., Amherst, OH 44001 			
	 Albright Terrace 129 Milan Ave., Amherst, OH 44001 John Frederick Oberlin Homes 138 South Main St., Oberlin, OH 44074 			
	Wilkes Villa 104 Louden Court, Elyria, OH 44035			
	o Riverview Plaza 310 East Ave., Elvria, OH 44035			
	o Harr Plaza 15 Chestnut Street, Elyria, OH 44035			
	o International Plaza 1825 Homewood Drive, Lorain, OH 44055			
	LMHA provides the Plans to its resident councils.			
	To obtain additional information on the policies contained in the Annual Plan, visit http://www.lmha.org/about-lmha/ and select either "Annual Reports and Audits" or "LMHA Policies". For further assistance, call 440.288.1600 or TDD/TTY (800) 750-0750.			

	☐ PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)					
	D C C DWA	DILLA C. I	D (): 4 C	Program(s) not in the	No. of Units i	n Each Program
	Participating PHAs	PHA Code	Program(s) in the Consortia	Consortia	PH	HCV
	Lead PHA:					
В.	Plan Elements					
B.1	Revision of Existing PHA Plan Elements.					
	(a) Have the following PHA Plan elements been revised by the PHA?					
	Y N					
	☐ Operation and Management. ☐ ☐ Grievance Procedures. ☐ ☐ Hamagements Programs					
	☐ ☐ Homeownership Programs. ☐ ☐ Community Service and Self-Sufficiency Programs.					
	□ Safety and Crime Prevention. □ Pet Policy. □ Apart Management					
	 ☐ Asset Management. ☐ Substantial Deviation. ☐ Significant Amendment/Modification 					
			describe the revisions for each revi	ised element(s):		
	b.1	av.	19			
	Attachment A - Statement of Housing Needs and Strategy for Addressing Housing Needs Attachment B -Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions Attachment C - Financial Resources Attachment D - Operation and Management Attachment E - Safety and Crime Prevention					
	b.6 Attachment F - Substan	tial Deviation S	ignificant Amendment/Modificat	tion		
	(c) The PHA must submit its Deconcentration Policy for Field Office review.					
	See Attachment G Deconcentration Policy of the Lorain Metropolitan Housing Authority					

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
	(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.
	See Attachment H New Activities.
B.3	Progress Report.
	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.
	See Attachment I Progress Report
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
	Capital Fund 5-YR 2023–2027 Revision #3, approved by HUD on 11/25/2024
B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N □ ⊠
	(b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?
	Y N
	(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.
	See Attachment J
C.2	Certification by State or Local Officials.
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	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.
C.4	Challenged Elements. 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.
	(a) Did the public challenge any elements of the Plan?
	Y N □ □
	If yes, include Challenged Elements.
C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A □ ⊠ □ (b) If yes, please describe:
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH).
	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.
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal
	PHA is not required to submit.
	•
	Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal
Fair Housing Goal:
Describe fair housing strategies and actions to achieve the goal

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

- A. PHA Information. All PHAs must complete this section. (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)(e))

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

- B. Plan Elements. All PHAs must complete this section.
 - **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." (24 CFR §903.7)

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA 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. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))
Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))
Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))
☑ Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))
Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))
☐ Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))
Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(1)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(1))
Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))
Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))
☐ Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))
Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))
Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. 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 §903.2 (24 CFR §903.23(b))
New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."
MOPE VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:
https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

B.2

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: 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 unit along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 1 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 . (24 CFR §903.7(h))
Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))
Conversion of Public Housing 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 Rental 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.
Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))
Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))
Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR §903.7(e))
Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).
☑ Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).
☑ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.
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))
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.3

- **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.
 - C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

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 in part 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.

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

Public reporting burden for this information collection is estimated to average 7.52 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.

Page 8 of 8

Attachment A

Statement of Housing Needs and Strategy for Addressing Housing Needs

At the end of calendar year 2024, nearly 82% of applicants for LMHA's housing programs were at or below the Extremely Low Income (ELI) level. Approximately 90% of public housing residents, 94% of multifamily residents, and 84% of participants in HCVP are ELI. For comparison, 2023 data shows that approximately 10.6% of families in Lorain County are ELI. Approximately 21% of the public housing households (285) have zero annual income.

Approximately 17% 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 properties 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 92 are elderly; 159 are persons with a disability. In LMHA's public housing, 485/36% of the heads of households are persons with a disability, and 240/18% of the heads of household are elderly.

This demonstrates that LMHA housing programs are providing housing for the needlest residents of Lorain County. Source for Lorain County statistics:

https://data.census.gov/table/ACSST1Y2023.S1701?q=Lorain%20County,%20Ohio&t=Income%20and%2 <u>OPoverty:Poverty</u>

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 281 requests for Reasonable Accommodations annually for all housing programs in calendar year 2024.

LMHA administers 175 vouchers for persons who are Non-Elderly Disabled (NED), 117 Veterans Affairs Supportive Housing (VASH) vouchers and are housing 2 persons via the Foster Youth to Independence (FYI) initiative. LMHA had 2 referrals in 2024 for the FYI initiative. One referral was withdrawn as other housing was secured. One was issued a voucher and is in the process of leasing up.

During projects involving substantial renovations, units will be constructed/renovated utilizing principles of universal design and visit ability. 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.

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 3 times.

LMHA is considering a modernization project to convert efficiencies to 1-bedroom units by combining 3 adjacent efficiencies into 1-bedroom or two-bedroom units. Lakeview Plaza, 310 W 7th Street, Lorain, OH 44052, in which 150 of the 209 units are efficiencies is ideal for this conversion. The project was added to the 2019 5-Year Action Plan and plans have been made to proceed with the project.

Homelessness in Lorain County

LMHA is in the process of adding a homeless preference to its housing programs. This is a Substantial Deviation/Significant Amendment to LMHA's approved plan and all requirements to amend the Annual Plan were followed. LMHA submitted its revised July 1, 2024 Annual Plan to include a homeless preference for its programs on January 31, 2025 and is awaiting HUD approval.

Information provided from Lorain County Homeless Shelters estimates that 178 persons are unsheltered on any given night. COHHIO's PIT count unsheltered figure was 11.

The City of Elyria Consolidated Plan identifies housing issues, homelessness, and other special needs as priorities. The 2020-2024 Consolidated Plan is in effect until September 30, 2025.

The plan is available at: https://www.cityofelyria.org/wp-content/uploads/2021/03/HUD-Consolidated-Plan-5-Year-Strategic.pdf); the 2024 Action Plan, currently available only in draft form, is available at: https://www.cityofelyria.org/wp-content/uploads/2023/10/DRAFT 2024 ANNUAL ACTION PLAN.pdf

LMHA is reviewing its portfolio and exploring collaborations with the City of Elyria to support increased affordable housing development in Elyria. In addition LMHA has a CHAP for the redevelopment of Wilkes Villa (Elyria).

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. LMHA may project base up to the 438 vouchers approved by HUD in February 2019. LMHA has awarded 79 vouchers that are in financing and development stages. These projects will serve seniors, homeless families, and homeless Veterans. Vouchers will be awarded throughout Lorain County either through a competitive RFP process or LIHTC or other competitive processes for supportive services.

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. The City of Lorain Consolidated Plan for 2025 to 2030 is available in draft form at:

https://www.cityoflorain.org/718/Consolidated-Plan-2025---2030

The plan will be finalized after two public hearings to be held on Monday, February 10, 2025 at 5:30 PM and Monday, February 17, 2025 at 5:30 PM.

All City of Lorain Annual Action Plans and the Consolidated Plan are available at:

https://www.cityoflorain.org/397/Permits-Publications

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 was awarded a Choice Neighborhood Planning Grant for the Southside Gateway Community in South Lorain in December 2022. The grant area includes Southside Gardens. The Final Southside Gateway Community Plan was submitted to HUD on December 20, 2024. More information on the Southside Gateway Community Plan is available at: https://www.southsidegateway.com/

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.

Waiting List Statistics

PUBLIC HOUSING (PH) - Reflects both active and in process As of 12/31/2024	# of Families	% of Total Families
Total	7877	100
Extremely low income (<=30% AMI)	6406	81
Very low income (>30% but <=50%AMI)	811	10
Low Income (>50% but <80% AMI)	188	2
Families with children ⁴	2284	30
Elderly families	303	3
Families with Disabilities	1343	17
Female HOH	5659	71
Hispanic		
White	4877	62
Black/African American	3242	41
American Indian/Alaska Native	289	3
Asian	51	0
Native Hawaiian/other Pacific Islander	99	1
Multi-racial	681	1

NOTE: LMHA Public Housing waiting list is currently closed.

Housing Choice Voucher Program Waiting List As of 12/31/2024	# of Families	% of Families
Total	3064	100
Extremely low income	2461	80
Very Low Income	468	15
Low Income	112	4
Families with children	1335	44
Elderly families	132	4
Families with disabilities	476	16
Female HOH	2504	82
Hispanic		
White	1515	49
Black/African American	1618	53
American Indian/Alaska Native	117	3
Asian	13	0
Native Hawaiian/other Pacific Islander	41	1
Multi-racial	240	7

Not reported	0	0
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NOTE: LMHA Housing Choice Voucher waiting list is currently closed.

MULTIFAMILY HOUSING APPLICANTS (Harr and International Plazas) As of 12/31/2024	# of Families	% of Families
Total	559	100
Extremely low income	526	94
Very Low Income	32	16
Low Income	1	0
Families with children	29	5
Elderly families	57	10
Families with disabilities	50	9
Female HOH	311	56
Hispanic	55	10
White	91	16
Black/African American	22	4
American Indian/Alaska Native	0	0
Asian	0	0
Native Hawaiian/other Pacific Islander	0	0
Multi-racial	0	0
Not reported	0	0

HCVP Participant Statistics

Housing Choice Voucher Program Active Participants As of 12/31/2024			
Total	2859	100	
Disabled HOH	1157	40	
Elderly HOH	597	21	
Hispanic	870	30	
Non-Hispanic	1989	70	
Female HOH	2376	83	
Male HOH	483	17	
White	1642	57	
Black/African American	1241	43	
American Indian/Alaska Native	36	1	
Native Hawaiian/Other Pacific Islander	28	1	
Asian	4	0	
Multi-Racial	80	3	
Extremely low income (ELI)	1724	60	
Very low income (VLI)	390	14	
Low Income (LI)	52	2	
High Income	4	0.1	
Average Household Income	14,485.82		

Attachment B

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

LMHA is in the process of adding a homeless preference to its housing programs. This is a Substantial Deviation/Significant Amendment to LMHA's approved plan and all requirements to amend the Annual Plan were followed. LMHA submitted its revised July 1, 2024 Annual Plan to include a homeless preference for its programs on January 31, 2025 and is awaiting HUD approval.

LMHA is updating its ACOP and Administrative Plan to add a policy allowing for opening and closing of public housing and S8 HCV waitlists for certain preferences only. If this policy is implemented, LMHA will clearly state in any public notices announcing the waitlist openings that only those eligible for the preference can apply. Preferences for HCV waitlists or public housing waitlists may be added to the Administrative Plan or ACOP, respectively, to allow for those households impacted by RAD or other rehabilitation and modernization projects undertaken by a project owner that require displacement or temporary relocation to receive preference point priority.

LMHA will also produce Affirmative Fair Housing Marketing Plans and Tenant Selection Plans for the Leavitt/Westgate/Westview Terrace and the Wilkes Villa properties which are to be converted to project-based rental assistance through RAD. Additionally, for any house rules developed by LMHA for these properties, the housing authority will ensure that the house rules are consistent with HUD's requirements for HUD subsidized projects, will be reasonable, and will not infringe on tenants' civil rights.

Attachment C

Lorain Metropolitan Housing Authority Annual Plan

Financial Resources - Expended on eligible purposes.	FFY Beginning July 1, 2025
1 Federal Grants - Current	
Public Housing Operating Fund	\$8,506,558.00
Public Housing Capital Fund	\$2,048,709.00
HOPE VI Revitalization	\$0.00
HOPE VI Demolition Annual Contributions for Section 8 Tenant Based	\$0.00
Assistance	\$27,748,077.13
Resident Opportunity and Self-Sufficiency Grants	\$275,700.00
Community Development Block Grant	\$0.00
HOME	\$0.00
Other Federal Grants	\$0.00
Shelter Plus Care	\$0.00
Prior Year Federal Grants(unobligated funds only)	\$12,106,915.00
3 Public Housing Dwelling Rental Income	\$3,204,646.00
	\$53,890,605.13

Attachment D

Operations and Management

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

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

LMHA is governed by a Board of Commissioners which contracts with three employees to lead the Housing Authority: Chief Executive Office, Chief Operating Officer, and Chief Development and Financial Officer. The Authority is comprised of various departments to administer its programs: executive management, accounting, contract administration/procurement, Human Resources, admissions, work orders, resident services, Housing Choice Voucher Program, and public/multifamily housing property management.

Property management is comprised of 5 public housing AMPs and 5 management/maintenance teams, one of which is responsible for the multifamily properties.

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

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

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

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

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

Air Conditioner Surcharge Policy
Applicant Screening Process
Appointment of Personal Designee Policy
Biohazard Cleanup Procedure
Canvassing Policy
Community Service Policy
Confidentiality Policy
Deconcentration Policy
Drug Free Safety Program

EIV Usage & Security Policy Elevator Entrapment Procedure

Emergency Evacuation Procedures

Ethics/Conflict of Interest Policy

Excess Water Consumption Surcharge Policy

Fair Housing Plan

Flat Rent Policy

Flood Cleanup Procedure

Hazard Communication Program

House Inspection Policy

Housekeeping Policy

Housekeeping Referral Program

ID Policy for entrance into High Rises

Integrated Pest Management Extermination & Bed Bug Policy

Key Usage Policy

Language Access Plan (Limited English Proficiency (LEP))

Minimum Rent Policy

One Strike Policy

Personal Information Policy

Pet Policy/Assistance Animal Policy

Procurement Policy

Public Records Request Policy

Reasonable Accommodations Procedure Manual

Records Retention Policy

Satellite Dish Installation Procedure

Scattered Site Eligibility Criteria

Smoke Detector Policy

Smoke Free Policy

Social Media Policy

Take Possession Policy

Transfer Policy

Unreported Income Repayment Policy

VAWA Policy/Emergency VAWA Transfer Policy

Work Order Procedures

Extermination Policies

LMHA has implemented an Integrated Pest Management (IPM) program which requires a commitment from all LMHA employees, residents, and extermination contractors to prevent and eradicate bed bugs, cockroaches, and other pests and vermin from all LMHA-owned/managed residential units.

Cooperative efforts on the part of the LMHA as well as all residents and guests will increase the likelihood of successful eradication not only with respect to bed bugs, but also regarding future infestations which pose a severe threat of contamination and are adverse to the health, safety, and welfare of LMHA residents.

All tenants must immediately notify the LMHA of the presence of bed bugs or other insects or vermin in or around his or her unit and cooperate with the LMHA extermination services. After the resident makes

the report, LMHA shall schedule an appointment for an inspection of the unit and personal property of the resident. Upon inspection, if the exterminator confirms the presence of roaches, bed bugs, insects, rodents, or animals, the reporting resident's apartment will be scheduled for extermination services. When possible, this extermination service will occur the same day as the inspection.

The resident will be responsible for the preparation of his or her unit for these services. Before the extermination services are started, an appointment letter with a description of all preparation requirements will be provided to the resident. In addition LMHA collaborates

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

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

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

To mitigate the occurrence of heavy infestations, LMHA's extermination contractors conduct quarterly inspections of all LMHA-owned/managed residential units. During these quarterly inspections, monitors are placed in high traffic areas and checked at the next quarterly inspection.

LMHA may implement a Vacancy Reduction Plan to address persistent pest infestations affecting unit leasing and vacancy rates.

LMHA's Bed Bug Heat Treatment Room at Lakeview Plaza will be completed the first quarter of 2025 and will provide additional service so that tenants' possessions can be treated as necessary. LMHA will install a Bed Bug Treatment Room at Kennedy Plaza in 2025.

Attachment E

Safety and Crime Prevention

LMHA's Safety and Service Director continually reviews LMHA's Safety and Crime Prevention procedures.

LMHA Security Department includes the Director, (1) Senior Security Officer and (7) Security Officers that work in the High-Rises in Lorain and Elyria. The security team monitors the buildings and fills out detailed logs for their buildings that provide information so that problems caused by residents or guests can be dealt with proactively. The security team monitors cameras and supports possible infractions or criminal offenses and has helped identify suspects and resolve issues.

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. Some people on the waiting list are reluctant to move into LMHA developments due to perceived and/or actual levels of minor and/or drug-related crime. LMHA's Department of Safety and Security continues to strive to make the residents of LMHA safe and secure in their dwellings.

Our R.A.W. (Residence Assistance Watch) is present 5 of LMHA's 7 High-Rises. The RAW are resident volunteers living in the High-Rises; they patrol their buildings and act as the eyes and ears for identifying potential criminal activity and unsafe conditions. RAW meets with the Safety/Security Director bimonthly to discuss any safety or security concerns. Information obtained shared with building managers.

LMHA's partnership with our local police departments is strong. With the installation of the new security camera system in Wilkes Villa, Elyria Police rely on LMHA for camera footage of crimes that may have taken place on our property. This open communication opens up the door for other dialogue involving EPD and our property. Constant sharing of information between LMHA and EPD is crucial in our efforts to keep LMHA residents informed and safe.

Statistics provided by the Elyria Police Department for our three LMHA properties (Harr Plaza, Riverview Plaza and Wilkes Villa) show no significant change from previous years. Harr Plaza shows a decrease by eight calls, while Riverview shows an increase by nine calls. Wilkes Villa is down by twenty eight calls which is attributed to fewer domestics and less No Offense Calls. No offense calls are when police respond to a call and they find that no offense has been committed.

LMHA also has a strong partnership with the Lorain Police Department (LPD). In addition to the regular sharing of information between LMHA and LPD, LMHA coordinated with LPD to utilize empty family site units at Leavitt Homes and Westview Terrace for K-9 training for drug sniffs and suspect apprehensions. These training events serve as a good Community Policing tool. Sometimes these events draw and crowd giving residents the opportunity to speak with police officers, ask questions, and build relationships.

Statistics provided by the Lorain Police Department include International Plaza, Lakeview Plaza, Kennedy Plaza, Southside Gardens, Leavitt Homes and Westview Terrace. The total number of calls for 2024 was 1347, slightly reduced from the 1368 total calls in 2023. Significant improvements were noted: assaults

were down by 10; property damage that was also down by 10. Unauthorized persons decreased from 104 in 2023 to 77 in 2024. Warrant arrests increased to 20 in 2024 from 9 in 2023.

Total cases for 2023 were 316, a decrease from 421 in 2022. The statistics for actual calls for service shows that LPD responded to Lakeview Plaza more than any other LMHA High-rise while the Leavitt Homes has the highest police response compared to Westview Terrace and South Side Gardens.

Safety and Crime Prevention (VAWA)

LMHA has adopted an Emergency Violence Against Women Act (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://ohl.rainn.org/online/

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

Further, LMHA Resident Service Coordinators and FSS Case Managers facilitate direct connection to domestic abuse resources and shelter for residents who express need for assistance. Each LMHA site community restrooms include the domestic abuse hotline posters that include contact information for the local safe harbor location. Each management office is equipped with informational pamphlets containing domestic abuse resources. Residents are provided with a copy of HUD-5380: Notice of Occupancy Rights under the Violence Against Women Act at each annual recertification, with any notice of lease termination, and with any notice of a grievance hearing. Additionally, Domestic Abuse Awareness projects are displayed in collaboration with the Genesis House Lorain County Safe Harbor in each Public Housing site and LMHA main office annually during Domestic Abuse Awareness month.

Attachment F

FY 2025 Proposed 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.

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, mixed-finance proposal, RAD Conversion or Capital Fund Financing.

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.

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.

The following RAD specific items do not constitute substantial deviation or significant modification from the present Plans.

Substantial Deviation

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion, including whether it incorporates a RAD/Section 18 Blend

Significant Amendment/Modification

a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;

- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion, including whether it incorporates a RAD/Section 18 Blend

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



Attachment G – Deconcentration Policy and Analysis

LMHA is committed to achieving a healthy mix of incomes in its public housing developments by attracting and retaining higher income families and by working toward deconcentration of poverty goals.

Methodology:

- 1. LMHA will determine the average income of all families in all covered developments on an annual basis.
- 2. LMHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.
- 3. LMHA will then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1.
- 4. LMHA with covered developments having average incomes outside the EIR will then determine whether these developments are consistent with its local goals and annual plan.
- 5. For developments outside the EIR LMHA will take the following actions to provide for deconcentration of poverty and income mixing:
 - As an incentive to employed individuals, LMHA will grant a permissive deduction to working families for medical insurance premiums withheld from the employed applicant's/resident's gross pay.
 - LMHA may also target investment and capital improvements toward developments with an average income below the Established Income Range to encourage applicant families whose income is above the Established Income Range to accept units in those developments.
 - For properties with average incomes below EIR, LMHA has chosen a strategy of
 working with current households to raise their incomes rather than adjusting
 admissions policies or criteria. LMHA will target the properties with high
 percentages of zero-income households, and which have an average household
 income below 85% of the LMHA average.
 - LMHA will consider its deconcentration goals when transfer units are offered.

Deconcentration Analysis and Statistics

LMHA conducted the analysis below in accordance with 24 CFR Part 903 Subpart A. It is the policy of the LMHA to calculate the average income for all covered developments and LMHA does not adjust its analysis for unit size when evaluating each covered development.

Average Income for All Covered Units			
Average Income 85% 115% Number of Units			
\$12,443.58	\$10,577.05	\$14,310.12	1438

Average Income in Each Covered Development					
Development Name	Number	Average	% of Average	Below	Above
	of Units	Income	Income of All	85%	115%
			Covered		
			Developments		
Albright Terrace	50	\$15,299.00	123%	No	Yes
John Frederick	53	\$11,724.00	94%	No	No
Oberlin					
Kennedy Plaza	177	\$9,818.00	79%	Yes	No
Lakeview Plaza	209	\$9,880.00	79%	Yes	No
Leavitt Homes	198	\$10,297.00	83%	Yes	No
Oberlin Homes	51	\$20,218.00	162%	No	Yes
Riverview Plaza	180	\$12,031.00	97%	No	No
Scattered Sites	80	\$18,329.00	147%	No	Yes
Southside Gardens	111	\$14,809.00	119%	No	Yes
Westgate	12	\$8,894.00	71%	Yes	No
Westview	143	\$9,669.00	78%	Yes	No
Wilkes Villa	174	\$8,355.00	67%	Yes	No

Strategies to impact the income targeting goals for those below 85%:

LMHA will work with current households to raise their incomes and will target the properties with high percentages of zero-income households, and which have an average household income below 85% of the LMHA average.

Strategies to impact the income targeting goals for those above 115%:

LMHA will consider income targeting goals when selecting applicants from the waiting list for housing offers and when processing transfers between public housing properties.

Attachment H

New Activities

Hope VI or Choice Neighborhoods

Choice Neighborhoods Transformation Grant: LMHA intends to apply for a Choice Neighborhood Implementation Grant for the Southside Gateway Community including Southside Gardens when HUD issues the Notice of Funding Opportunity in 2025.

Mixed Finance Modernization or Development

LMHA is planning to pursue a portfolio wide CHAP to reposition its public housing stock through the RAD program. LMHA may utilize a variety of different options as part of the plan which could include RAD Section 18 blends or straight RAD conversions which may include project-based vouchers. Additionally, LMHA plans to utilize the 4% tax credit program through the Ohio Housing Finance Agency (OHFA) to accomplish this plan along with Capital Funds or LMHA Funds. LMHA intends to submit an application for 4% Tax Credits the 1st quarter 2025.

LMHA also plans to develop new public/affordable housing units. LMHA is exploring the option of developing these units with the Faircloth to RAD program, Low-Income Housing Tax Credits, and other funding/financing resources. LMHA will submit a 9% LIHTC application for a Multifamily tax-credit project on Clinton Avenue between 32nd and 33rd to include 1-to-4-bedroom units.

Demolition and/or Disposition

LMHA's request to dispose of the Central Administrative Office property at 1600 Kansas Avenue, Lorain, OH 44052 via sale was approved by HUD on December 18, 2024.

LMHA also plans to dispose of all scattered site units, listed below, through sale at fair market value.

List of Properties: Attached hereto as Ex. 1

Additionally, LMHA is planning to pursue a portfolio wide CHAP to reposition its public housing stock through the RAD program. LMHA may use a variety of different options as part of the plan, which could include the RAD/Section 18 Blends.

Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD

Lorain Metropolitan Housing Authority (LMHA) was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Lorain Metropolitan Housing Authority will be converting to Project Based Rental Assistance under the guidelines of PIH 2019-23, REV-4, PIH Notice 2023-19, PIH Notice 2025-03 and any successor notices. LMHA is contemplating converting through RAD and Section 18 Construction Blend Strategy. Upon conversion to Project Based Rental Assistance, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.7 of PIH 2019-23, REV-4 (including Supplemental Notices 4B and 4C) and PIH-2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Lorain Metropolitan Housing Authority certifies that it is currently compliant with all fair housing and civil rights requirements, including relocation requirements. LMHA is compliant with all applicable site

selection requirements as set forth in PIH Notice 2016-17, including Section 5.2 relating to PHA's proposed site selection and certification.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing the Lorain Metropolitan Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and the Lorain Metropolitan Housing Authority may also borrow funds to address their capital needs.

Below, please find specific information related to the Public Housing Developments selected for RAD:

Development #1: Leavitt, Westgate, and Westview Terrace

Project Name: Leavitt Homes (Leavitt, Westgate, and Westview Terrace)	PIC Development ID: OH012000001	Conversion Type: PBRA	Transfer of Assistance: No
Total units: 353	Pre-RAD unit type: Family	Post-RAD Unit type: Family	Annual Capital Fund Grant attributable to the Project = \$1,258,981.56
Bedroom type	Number of units pre- conversion	Number of Units post- conversion	Change in number of units per bedroom type, and why (de minimis reduction, transfer of assistance, unit reconfigurations)
Studio/efficiency	0	0	0
One bedroom	28	28	0
Two bedroom	157	157	0
Three bedroom	138	138	0
Four bedroom	30	30	0
Five bedroom	0	0	0
Six bedroom	0	0	0
No transfer of assistance will occur.			

Development #2: Wilkes Villa

Project Name: Wilkes-Villa	PIC Development ID: OH012000003	Conversion Type: PBRA	Transfer of Assistance:
Total units: 174	Pre-RAD unit type: Family	Post-RAD Unit type: Family	Annual Capital Fund Grant attributable to the Project = \$589,839.12
Bedroom type	Number of units pre- conversion	Number of Units post- conversion	Change in number of units per bedroom type, and why (de minimis reduction, transfer of assistance, unit reconfigurations)
Studio/efficiency	0	0	0
One bedroom	6	6	0

Two bedroom	80	80	0	
Three bedroom	54	54	0	
Four bedroom	18	18	0	
Five bedroom	12	16	+4	
Six bedroom 4 0 -4				
No transfer of assistance will occur.				

Resident Rights, Participation, Waiting List and Grievance Procedures

See Ex. 2 : PIH 2019-23, REV-4 (including Supplemental Notices 4B an 4C) Section 1.7.B & Section 1.7.C for provisions relating to PBRA administration; and

See Ex. 3: PIH-2016-17 for civil rights and relocation requirements.

Significant Amendment Definition:

As part of the Rental Assistance Demonstration (RAD), Lorain Metropolitan Housing Authority is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion. Section 18 Demolition and/or Disposition

Project Based Vouchers: In 2019 HUD approved 438 vouchers to be utilized for Project Based Vouchers. LMHA may issue a rolling RFP to offer PBVs to create additional mixed income, deeply affordable, LIHTC, and PBV communities throughout Lorain County . Vouchers will be awarded through a competitive RFP process or based upon a LIHTC or other competitive process award as permitted under LMHA's Administrative Plan. This will include the construction of new designated housing for elderly and/or disabled families and or new family mixed income/workforce PBV communities. This will also include renovating existing housing through the LIHTC program and using PBV's as needed.

Units with Approved Vacancies for Modernization:

LMHA is planning to convert efficiency units at Lakeview Terrace to one or two bedroom ADA Accessible units to meet the needs of LMHA's requested and approved transfer list. LMHA is exploring conversion of efficiency units at Kennedy Plaza to one or two bedroom ADA Accessible units to meet the needs of LMHA's requested and approved transfer list.

LMHA will submit a request for approval by HUD for modernization vacancies as applicable for this purpose and for units requiring extensive renovation.

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

LMHA is planning to apply for other capital grant programs as available. LMHA may apply for Capital Fund Community Facilities Grants or Emergency Safety and Security Grants.

LMHA continually reviews and intends to apply for HUD, other public, and private philanthropic grant opportunities that support development, community initiatives, and programming for residents and participants.

Other New Activities

LMHA may pursue development of a Public Housing Home Ownership Program.

LMHA plans to acquire a property located at 457 Broadway, Lorain, OH for Central Office operations. LMHA will lease and/or partner with other local government, nonprofits, or businesses to lease space in the new building to provide LMHA income and increase service access to the community.

LMHA may implement a Vacancy Reduction Plan to address persistent pest infestations affecting unit leasing and vacancy rates.

LMHA plans to install Bed Bug Heat Treatment rooms at its public housing high-rises: Riverview Plaza and John Frederick Oberlin Homes. LMHA is installing Bed Bug Heat Treatment rooms at Lakeview and at Kennedy Plaza. Lakeview Plaza's heat treatment room will be complete in early 2025 and Kennedy Plaza's in late 2025 or early 2026.

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Attachment I

Goal Progress

Goal #1: Expand the supply of affordable housing

- LMHA's total voucher count reached 3,171
- LMHA now has a total of 117 VASH Vouchers and has been allocated 5 additional vouchers effective 3/1/2025; these are not reflected in our total count.
- LMHA has 175 vouchers for persons who are non-elderly disabled (NED)
- LMHA will continue to partner with Lorain County for funding for Tenant Based Rental Assistance (TBRA) funds to assist HCVP applicants with security deposits, first month's rent and/or utility deposits in areas outside of Lorain, Elyria, and N. Ridgeville.
- LMHA partnered with the City of Elyria for funding for Tenant Based Rental Assistance (TBRA) funds to assist HCVP applicants with security deposits, first month's rent and/or utility deposits in the City of Elyria
- Promoted communities throughout Lorain County to encourage deconcentration of low-income housing from traditional areas of poverty
- Provided 62 project-based vouchers to Bridge Pointe Commons all units are online
- Provided 16 project-based vouchers to Faith House all units are online
- Provided 5 project-based vouchers to Family and Community Services subsidy layering review in progress -units are expected to be online by in 2025/2026
- Provided 8 project-based vouchers to Ridgeville Farms this project was awarded 9% tax credits in May 2023;
- Provided 50 project-based vouchers to Broadway Commons a supportive housing development
 there is no movement on this project completion date unknow
- Provided 8 project-based vouchers to South Lorain Family Apartments there is no movement on this project
 Provided 8 project-based vouchers to Foster Senior Lofts – units are expected to be online

Goal #2: Improve the quality of affordable housing

2025/2026

- LMHA obligated \$ 465,785 in capital improvements for public housing properties;
- LMHA's S| Building Systems and Capital Needs Manager and Senior Maintenance Manager continue to review LMHA systems to identify critical needs, review past planning and forecast capital needs; information gathered from staff as well as current HQS and REAC inspections informed LMHA's 2025 Annual Plan and Five Year Action Plan
- LMHA completed its Physical Needs Assessment and Energy Audit in July 2023.

Goal #3: Enhance the provision of services to residents, applicants, and the public

The LMHA Resident Service Coordinators work one-on-one with residents providing needs assessments and facilitating connections with organizations who have the resources to meet the resident's needs. Resident Service Coordinators are trained to reduce resident barriers and offer resources that help with housing retention and improve the resident's quality of life. From our youth to our senior citizens, the Resident Service Coordinator is equipped with the knowledge needed to resolve challenges the resident is experiencing. The Resident Services Department plan events and functions designed to bring communities together while meeting outside agencies who offer resources useful to the residents.

Residents can also participate in programming and educational classes that promote well-being, healthy eating, financial soundness, and other topics that support the resident's overall quality of life.

Resident Councils give all residents the opportunity for their voice to be heard and to contribute to Resident Council initiatives within their property. They may also run for office or serve on committees whose goal is to listen to the residents' ideas and suggestions and work towards creating environments within their community that enhance the living experience for all.

LMHA offers the Family Self-Sufficiency Program to both the Public Housing residents and HCV participants. LMHA is also a HUD certified Housing Counseling agency. Public Housing residents and HCV participants have the opportunity to attend financial literacy and prepurchase education classes that prepare them for the purchase of their own home. Those who are not ready for homeownership can work with our HUD certified housing counselor on topics like budgeting, credit, debt reduction, savings plans, and other areas that move them closer to mortgage readiness. HCV participants who meet the HCV Homeownership program eligibility criteria, also have the opportunity to purchase their own home with their HCV assistance on the HCV Homeownership program.

Further, LMHA has multiple partnerships with community agencies who offer services designed to increase self-sufficiency and decrease need for public assistance. Many partners offer programming and assistance on site at an LMHA Resource Center in post-secondary education, job search assistance, transportation, childcare, fatherhood support and other topics crucial to self-sufficiency. Our network of providers allows us to offer a consistent stream of opportunities available to our residents. We continue to focus on increasing our partnerships and programming offered to our Public Housing residents year after year.

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 Coordinators 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
- 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 was implemented in 2023 and continues for new resident council officers with
 the goal of fully trained and compliant resident councils and RAB operating under updated Bylaws 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.

- LMHA's Green Thumb flower and garden program continues to inspire 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. 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.
- 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.
- 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 was without a certified housing counselor when the only LMHA Certified Housing Counselor staff member left LMHA on March 27, 2024. LMHA partnered with Urban League, a Certified Credit Counseling Agency, to maintain uninterrupted services to residents and participants. LMHA now has a Certified Housing Counselor on staff and this issue is resolved. LMHA will continue to partner with the Urban League to support offerings to our residents and participants.
- LMHA conducts Group Housing Counseling Homebuyer's Education which fulfills the HCV Homeownership program requirements
- Boys and Girls Club: On site at Westview Terrace provides childcare for children residing with the Housing Authority at Leavitt Homes and Westview Terrace.
- LMHA participates in the Domestic Violence Awareness Task Force in collaboration with the Genesis House Lorain County Safe Harbour
- Referrals were 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, 2024, there were 33 children residing at Wilkes Villa that were 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 and Westview Terrace.
- Offer Financial Assistance for Education to assist residents to improve work skills and achieve individual and educational goals
- Publishes a quarterly 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
- In collaboration with local supportive and faith-based organizations, holiday meals were provided to residents throughout LMHA properties
- LMHA participates in the Lorain County Homeless Task Force
- Coordinates employment assistance with Lorain County Goodwill: Job Club; Ohio Means Jobs:
- Catholic Charities provides resources to LMHA residents upon request
- 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

- 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 (22 families), Kennedy (21 families), International (10 families), and Harr Plazas (23 families) with monthly Senior Food Boxes
- LMHA assisted Wilkes Villa Resident Council distribute backpacks stuffed with school supplies.
- LMHA partnered with Mini-Pioneers football to provide a youth football camp with plans to expand youth programming and opportunities.
- LMHA hosts an annual Senior Resource Fair aimed at connecting our senior population with multiple life-enriching resources.
- LMHA partnered with Catholic Charities to provide tenants at Harr and International Plazas on site assessment behavioral / mental health, counseling (individual, couple, family, and group), substance use counseling, case management, and social hours/engagement.
- LMHA partnered with AXS Performance to provide tenants at Harr and International Plazas with low impact mature exercise routine
- LMHA partnered with Knights beds and delivered 90 beds, linens, and teddy bears to Housing Authority family sites Wilkes Villa, Southside Garden, Leavitt and Westview Terrace
- LMHA partnered with McGregor PACE to provide Harr and International Plazas tenant with an all-inclusive care coordination that includes nursing, rehab, personal care needs, home support, transportation, meals on wheels, home health care, prescription medication management, group activities (day care) physical and occupational therapy
- LMHA in collaboration with Ohio State University extension Lorain County OHIO SNAP –ED
 provide LMHA high rises and family site tenants with workshops that provide recipe samplings,
 kitchen gadgets and conversation on healthy food topics
- LMHA collaborated with Lorain County Urban League/Serving the streets to provide Wilkes Villa, Leavitt and Westview Terrace family sites awareness on the impact of street violence to families and the community, block party to promote unity and community clean up
- LMHA partnered with Elyria Public Library WorkForce and Outreach Center to provide Harr, Riverview, and Wilkes Villa tenants a mobile van outfitted with laptops, printer, Wi-Fi and small seating for small collaboration and assistance
- LMHA collaborated with Lagrange Pharmacy to offer Housing Authority tenants at JFO a vaccine clinic

Goal #4: Increase the supply of accessible housing

- Retrofit units with desired accessible features for residents who request accommodations.
 Common accommodation requests which required retrofitting units are installation of grab bars, installation of walk-in showers, and installation of raised toilets.
- LMHA reviewed 285 requests for reasonable accommodations in 2024

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, 2024, thru December 31, 2024:

63 current PH FSS participants

- 31 new participants added
- 12 graduated with final escrow disbursements totaling \$67,285.22
- 33 have positive escrow accounts totaling \$129,311.31
- 12 new escrow accounts established this year
- 18 increased their escrow deposits due to higher earned income
- 43 are employed
- 19 have been employed more than a year
- 1 participant receives Temporary Assistance to Needy Families (TANF) Cash Assistance
- 7 continue to work on General Education Diploma (GED)
- 9 are enrolled in college or technical school
- 3 have earned a degree or certification
- Highest Disbursement check total \$17361.18

LMHA's Housing Choice Voucher FSS program statistics for January 1, 2024, thru December 31, 2024:

- 72 current HCV FSS participants
- 16 new participants added
- 20 graduated with final escrow disbursements totaling \$132,169.38
- 41 have positive escrow accounts totaling \$155,864.59
- 11 new accounts established this year
- 14 increased their escrow deposits due to higher earned income
- 47 are employed
- 25 have been employed more than a year
- 1 participant receives Temporary Assistance to Needy Families (TANF) Cash Assistance
- 1 continues to work on their General Education Diploma (GED)
- 10 are enrolled in college
- 7 have associate degrees
- 1 has a bachelor's degree
- Highest Disbursement check total \$25,576.06

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 94 active participants and has assisted 221 participants to purchase homes since the program's inception in 2002. Seven (7) participants became new homeowners in 2024. LMHA has a goal of eight (8) new homeowners in 2025.

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 2024, the program had:

- 47 families complete pre-purchase homebuyer / financial literacy education workshop
- 16 families receive one-on-one counseling for pre-purchase/home buying (Through Urban League and El Centro)
- 16 Households improve their financial capacity (e.g., increased discretionary income, decreased debt load, increased savings, increased credit score) after receiving Housing Counseling Services. (Through Urban League and El Centro)
- 7 Households receive pre-purchase /home buying counseling and purchase their own homes after receiving Housing Counseling Service

Goal #6: Promote and market LMHA's owned and managed affordable housing in Lorain County, not only Public Housing and Multifamily properties but also the HCVP Program

- LMHA advertised through a variety of diverse daily and monthly publications and media, such as
 traditional newspapers, radio advertisements, ethnic publications, and coupon programs to
 ensure residents of Lorain County are aware of the availability of affordable housing without
 discrimination
- LMHA expanded its 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
- LMHA printed and emailed newsletters for its residents and participants
- LMHA improved engagement with local government entities and community partners to improve access to all LMHA programs
- LMHA attends local community events to share information on affordable housing throughout Lorain County and Fair Housing resources

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

- Continue to provide protective services at various properties as funds are available LMHA's in house Security Services provide greater flexibility in addressing issues as they arise
- Provide above baseline police protection services at public housing properties and multifamily properties as funds are available
- LMHA has contracted to install security cameras at all family and highrise sites
- Continue to encourage residents to report suspicious or criminal activity observed at their properties
- Residents and participants use multiple alternative methods of reporting criminal or suspicious activity, such as text messaging, emailing, voicemail, or online reporting capabilities
- LMHA publicized an "if you SEE something Say something" campaign. A confidential tip line and web link allows people to report issues or suspicious activity

Goal #8: Explore and Implement Green Initiatives

- Continued review and implementation of lighting improvements throughout LMHA
- Reduced the amount of paper consumed through transition to Yardi Enterprise Software System, DocuSign, Adobe sign and email of documents

- Applicants now can apply electronically for Public Housing and Section 8 through the Applicant Portal
- Continuing purchase of only Energy Star appliances (refrigerators and air conditioners at several properties)
- Utilized low/no-VOC paints and sealants
- Maintain and facilitate virtual connection to site community rooms to maximize resident engagement for all residents and participants

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

 Conducted annual Fair Housing Training and Reasonable Accommodation training for all employees, with some being tailored to specific personnel, such as maintenance staff, receptionists, management, inspectors, case workers, etc.

Goal #10: Promote deconcentration

- During orientations, promote benefits of living in areas of Lorain County outside of the areas of high poverty by highlighting housing opportunities, services, employment opportunities and amenities.
- Increased affordable housing choices by assessing low poverty areas and increasing voucher payment standards.
- LMHA began using Small Area Payment Standards effective 1/1/2025. This allows the families to choose higher market rent areas that may have otherwise been unaffordable, which encourages the deconcentration of poverty.
- Supported portability by allowing families the opportunity to move outside of areas of poverty
- Encouraged the use of www.affordablehousing.com where families may seek housing via the internet.
- LMHA Executive staff and HCV department held an in person HCV Landlord engagement event in January 2024 and October 2024.
- LMHA was awarded a Housing Mobility Planning Grant and is assembling a plan to help HCV families to find housing in less concentrated areas of poverty and areas of opportunity.