



Lakeland Housing Authority Agency Plan 2023

**The Housing Authority of the City of Lakeland
Request for Board Action**

1. Describe Board Action Requested and why it is necessary:

Re: Resolution # (22-1518)

The Board of Commissioners is requested to approve the above-referenced resolution in order to satisfy a United States Department of Housing and Urban Development regulation.

2. Who is making request:

A. Entity: LHA

B. Project: Approval of the LHA 2023 Agency Plan including but not limited to the Capital Funds Plans and Budgets, Administrative Plan for the Housing Choice Voucher, the ACOP for the Public Housing Program, Limited English Proficiency Plan (LEP/LAP), Analysis of Impediments, Family Self Sufficiency Plan, Flat Rents Schedule, ADA 504 policy, Mold Policy, New Salary Ranges Schedule, Maintenance Policy, Preventative Maintenance policy, Procurement policy, Organizational Chart, Housing Choice Voucher (Section 8) Homeownership Plan and signing the *PHA Certification of Compliance with the PHA Plans and Related Regulations*, forms 50075-ST (ST Performance Agency) and 50077's.

C. Originator: Carlos R. Pizarro An

3. Cost Estimate:

Nominal cost of submittal to the Department of Housing and Urban Development

Narrative:

Annually, the Board of Commissioners of a Public Housing Agency is required to have its Chair (or other authorized official sign) the Department of Housing and Urban Development's *PHA Certification of Compliance with the PHA Plans (Agency Annual Plan, Capital Fund Plans and Budgets, Administrative Plan for the HCV Program, the ACOP for the Public Housing Program, Limited English Proficiency (LEP/LAP Plan), Analysis of Impediments, Family Self Sufficiency Plan, Flat Rents Schedule, ADA 504 policy, Mold Policy, New Salary Ranges Schedule, Maintenance Policy, Preventative Maintenance*

policy, Voluntary Conversion, demolition and development activities, Procurement policy, Organizational Chart, Housing Choice Voucher (Section 8) Homeownership Plan and Related Regulations, forms 50075-ST and 50077's, and have staff submit the form to the Department of Housing and Urban Development.

This resolution is to authorize the Chair of the Board of Commissioners of the Housing Authority of the City of Lakeland to sign forms 50075-ST and 50077's and to direct the Executive Director of the Housing Authority of the City of Lakeland to submit the signed form to the Department of Housing and Urban Development.

Attachment:

- *2023 Agency Plan, PHA Certification of Compliance with the PHA Plans (Agency Annual Plan, Capital Fund Plans and Budgets, Administrative Plan for the HCV Program, the ACOP for the Public Housing Program, Limited English Proficiency (LEP/LAP Plan), Analysis of Impediments, Family Self Sufficiency Plan, Flat Rents Schedule, ADA 504 policy, Mold Policy, New Salary Ranges Schedule, Maintenance Policy, Preventative Maintenance policy, Voluntary Conversion, demolition and development activities, Procurement policy, Organizational Chart, Housing Choice Voucher (Section 8) Homeownership Plan and Related Regulations, forms 50075-HP and 50077 CR and SL, etc.*

2023 Agency Plan

A PHA Plan is a comprehensive guide to public housing agency (PHA) policies, programs, operations, and strategies for meeting local housing needs and goals. There are two parts to the PHA Plan: The Annual Plan--which each PHA submits to the Department of Housing and Urban Development once a year based on the PHA fiscal year, which is submitted to the Department of Housing and Urban Development every year. It is through the Annual Plan that a PHA receives capital funding.

A PHA Plan also serves as the annual application for grants to support improvements to public housing buildings (Capital Fund Program) as well as safety in public housing.

Any local, regional, or State agency that receives funds to operate Federal public housing or Section 8 tenant-based assistance (vouchers) programs must submit a PHA Plan.

To ensure public participation in the process, LHA staff provided a copy of the plan to the LHA Board of Commissioners and the City Wide Resident Organization, which serves as the Resident Advisory Board of the Housing Authority of the City of Lakeland (RAB). Copies were also made available at various LHA sites as well as the City of Lakeland Community Redevelopment Agency.

LHA's senior staff scheduled a series of meetings with the RAB to involve the residents in the PHA Plan process.

One of the requirements of the Agency Plan is to schedule public meetings for community review and a *question and answer* period. The Public Forum and meetings for this year's Plan were held at the LHA Administration building.

The process to develop LHA's 2023 PHA plan spanned nearly three months and involved the collaboration of LHA staff, Public Housing residents, participants in the Housing Choice Voucher Program, stakeholders in the community, the City of Lakeland and, of course, LHA Board of Commissioners.

RESOLUTION NO. 22-1518

APPROVING THE 2023 AGENCY PLAN AND POLICIES

WHEREAS Public Housing Agencies are under the regulations set forth in Public and Indian Housing Notice 99-51 and 2001-26 requiring the submittal of Public Housing Agency Plans and related certifications; and

WHEREAS, the United States Department of Housing and Urban Development requires that all Public Housing Agencies submit the *PHA Certification of Compliance with the PHA Plans and Related Regulations*, form 50075-ST; and

WHEREAS, the Housing Authority of the City of Lakeland made modifications to its *Agency Plan, PHA Certification of Compliance with the PHA Plans (Agency Annual Plan, Capital Fund Plans and Budgets, Administrative Plan for the HCV Program, the ACOP for the Public Housing Program, Limited English Proficiency (LEP/LAP Plan), Analysis of Impediments, Family Self Sufficiency Plan, Flat Rents Schedule, ADA 504 policy, Mold Policy, New Salary Ranges Schedule, Maintenance Policy, Preventative Maintenance policy, Voluntary Conversion, demolition and development activities, Procurement policy, Organizational Chart, Housing Choice Voucher (Section 8) Homeownership Plan and Related Regulations, forms 50075-HP and 50077, etc.* collectively referred to as the *Agency Plan and policies*; and

WHEREAS, the Housing Authority of the City of Lakeland circulated the 2023 *Agency Plan* to its public housing residents, its Housing Choice Voucher participants, the Resident Advisory Board of the Housing Authority of the City of Lakeland, and other interested parties: and

WHEREAS, the Housing Authority of the City of Lakeland conducted public meetings to obtain the public's input and comments on its one-year 2023 Agency Plan;

NOW THEREFORE, be it resolved by the Board of Commissioners of the Housing Authority of the City of Lakeland that the Board Chairman is authorized to sign the *PHA Certification of Compliance with the PHA Plans and Related Regulations*, forms 50075-ST and 50077 (attached hereto), which the Executive Director will afterwards submit to the Department of Housing and Urban Development.

CERTIFICATE OF COMPLIANCE

This is to certify that the Board of Commissioners of the Housing Authority of the City of Lakeland has approved and adopted the Resolution No. 22-1518, dated September 19, 2022.

Attested by:

Benjamin Stevenson, Secretary

Don Brown, Chairman

NOTICE OF PUBLIC MEETINGS AND PUBLIC HEARING

Lakeland Housing Authority

FY 2023 Agency Plan

The Lakeland Housing Authority (LHA) has scheduled two public meetings on its FY 2023 Agency Plan with the Resident Advisory Board and the general public at 9:00 a.m. on July 14, 2022, and July 28, 2022, at 8:30 am, the meeting (s) will be conducted inside the Lakeland Housing Authority Conference Room. The plan will be posted at www.lakelandhousing.org for forty-five (45) days starting June 17, 2022. You can also send your comments in writing to 430 Hartsell Avenue, Lakeland Florida 33815, attention “Agency Plan 2022”.

The Public Hearing is scheduled for August 4, 2022, at 8:30 a.m.

LHA has developed its Agency Plan in accordance with the Quality Housing and Work Responsibility Act of 1998 including, but not limited to, additional updates received from the Department of Housing and Urban Development.

The Agency Plan, Capital Funds budgets, policies and addendums are available for review at the above address between the hours of 8:00 a.m. and 5:00 p.m., Monday through Thursday, beginning on June 17, 2022, and ending on August 1, 2022. The plan will be posted for 45 days. Inquiries and comments may be directed to Carlos Pizarro, Senior-Vice-president of Housing, at cpizarro@lakelandhousing.org and/or Valerie Brown, Vice-president of Administration, at vbrown@lakelandhousing.org and/or Florida Relay services at 711 and/or by visiting: www.LakelandHousing.org.

Copies of the Agency Plan will be also available for review at the following locations:

- City of Lakeland Community Redevelopment Agency--228 South Massachusetts Avenue, Lakeland, FL 33801
- All the properties and locations within the Lakeland Housing Authority portfolio.

The Housing Authority of the City of Lakeland dated June 17, 2022.

L2023 06/17; 2022-Public and Legal Notice



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

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD 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.

A. PHA Information.						
A.1	<p>PHA Name: <u>The Housing Authority of the City of Lakeland</u> PHA Code: <u>FL011</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/01/2023 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>255</u> Number of Housing Choice Vouchers (HCVs) Total Combined Units/Vouchers <u>1686</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Annual PHA Plan will be available at the following locations:</p> <p>Housing Authority of the City of Lakeland 430 Hartsell Avenue Lakeland, FL 33815</p> <p>All the properties and locations within the Housing Authority of the City of Lakeland portfolio.</p> <p>Housing Authority of the City of Lakeland's website: https://lakelandhousing.org/</p> <p>City of Lakeland Community Redevelopment Agency 228 South Massachusetts Avenue Lakeland, FL 33801</p> <p>City of Lakeland - Public Library Larry R. Johnson Branch Library 1700 North Florida Avenue Lakeland, FL 33805</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) Not applicable.</p>					
Participating PHAs		PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
Lead PHA:					PH	HCV

B.	Plan Elements					
B.0 Financial Resources: Planned Sources and uses						
This section lists the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Revision: Updated table of financial sources and uses below.						
Sources		Planned \$		Planned Uses		
1. Federal Grants (FY2022 grants)						
a)	Public Housing Operating Fund	\$1,341,596		PH Development/Modernization/ Job Readiness		
b)	Available Public Housing Capital Fund	\$5,605,422 minus any obligated funds		Modernization and Development		
c)	Annual Contributions for Section 8 Tenant-Based Assistance	\$12,416,179		Voucher, VASH, M5, TP, FY, etc....		
d)	Resident Opportunity and Self-Sufficiency Grants	\$198,000		3 Year grant		
Other Federal Grants (list below)						
	Low Income Housing Tax Credits (SAIL)	\$0.00				
2. Prior Year Federal Grants (unobligated funds only) (list below)						
	CFP 2023 (Estimated)	<u>\$889,780</u>		Modernization and PH Development		
	CFP 2022	\$889,780		Modernization and PH Development		
	CFP 2021	\$1,085,963		Modernization and PH Development		
	CFP 2020	\$1,115,701		Modernization and PH Development		
	CFP 2019	\$971,182		Modernization and PH Development		
	CFP 2018	\$934,727		Modernization and PH Development		
	CFP 2017	\$608,069		Modernization and PH Development		
	URP/HOPE VI	\$0.00		Modernization/ PH Development		
	DOL Youth Build	\$1,500,000		Youth Build Program		
	FSS Grant (Sec.8 HCV and Public Housing combined)	\$135,000		Resident Services		
3. Public Housing Dwelling Rental Income		\$699,444		PH		
4. Other income (list below)						
	Investment Income	\$2,600,000 Unaudited		PH		
Total resources		\$24,495,641				

B.1 Revision of Existing PHA Plan Elements.

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

Y N

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

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

Criteria for Substantial Deviation and Significant Amendments

24 CFR Part 903.7 (r) (2)

Significant Amendment or Modification to the Five-Year Plan and/or Annual Plan:

A Significant Amendment or Modification to the Annual Plan is a change in policy pertaining to the operation of the Housing Authority (HA). The HA will consider the following actions as a Significant Amendment or Modification to the Five-Year Plan and/or Annual Plan:

Amendment to the ACOP-Public Housing

The Lakeland Housing Authority is amending its PHA Annual Plan and ACOP. Implementing the following: the PHA will give the over-income family (*Two years after the family becomes over-income) at least thirty days' notice to vacate the unit when the unit is needed for rental to an eligible family. We are incorporating this amendment as part of our statement of deconcentration and other policies that govern eligibility, selection, and admissions.

Amendment to HCV Administrative Plan

Lakeland Housing Authority

The Lakeland Housing Authority is amending its PHA Annual Plan to include new activity related to the issuance of Project-Based Vouchers to the project known as Twin Lake Estates, Phase III. If using Project-Based Vouchers (PBVs), the PHA Plan Template HUD-50075-ST requires the PHA to provide the projected number of project-based units and general locations and describe how project basing would be consistent with the PHA Plan.

- a) Projected number of project-based units: 80
- b) Location: Twin Lakes Estates, Phase III, 501 Hartsell Avenue, Lakeland, Polk County, FL 33815
- c) Twin Lakes Estates, Phase III complies with the PHA goals to deconcentrate poverty and expand housing and economic opportunities and is consistent with Site and Neighborhood Standards for new construction.

Project Overview

Twin Lakes Estates, Phase III ("Phase III") is the last phase of a master plan to redevelop West Lake Apartments, a 120-unit obsolete public housing complex built in the 1940s. Combined, the three phases of the West Lake Apartments redevelopment will return 318 affordable units to the community (24 ACC, 80 senior PBV, 80 replacement family PBV, and 134 LIHTC). Phases I and II were completed in 2018 and 2020 respectively and are fully occupied.

Phase III redevelopment plan will consist of 86 affordable family housing units distributed in four four-story buildings on a 3.17-acre lot. To deconcentrated poverty, 77 will be LIHTC affordable housing units for households at sixty percent (60%) of Area Median Income (AMI) and nine units will be LIHTC affordable housing units for households at forty percent (40%) of AMI. In addition, Phase III will be expanding housing and economic opportunities by building 86 units where, previously, there were only 32 units. The neighborhood is not in a qualified census tract and is not an area of minority concentration. In addition, the site has access to public transportation, and services and community amenities like those of market rate units.

The new units will replace West Lake Apartments public housing units demolished in phases II and III and receive Project-Based Voucher assistance. The former residents will receive priority preference for return to the redeveloped property if they choose to return.

The ownership structure for the proposed project includes LHA as the lessor of a 65-year ground lease. In addition, affiliate entities of the LHA and HTG formed a Limited Partnership named Twin Lakes III, Ltd. to own and operate the project.

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The new units will replace West Lake Apartments public housing units demolished in phases II and III and receive Project-Based Voucher assistance. The former residents will receive priority preference for return to the redeveloped property if they choose to return.

The LHA entered into a Master Development Agreement with the Housing Trust Group (HTG) for the redevelopment project. The ownership structure for the proposed project includes LHA as the lessor of a 65-year ground lease. In addition, affiliate entities of the LHA and HTG formed a Limited Partnership named Twin Lakes III, Ltd. to own and operate the project.

B.2 New Activities.

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

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

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

Section B.2 - HUD-50075: New Activities

LHA goal is to transform its entire public housing portfolio into mixed-income communities over the next 2 to 40 years, in an effort to reposition the agencies’ public housing assets into better performing developments that are competitive in the marketplace as well as improve their physical and social conditions.

For over twenty-five years LHA’s Development Department has been responsible for creating economic development opportunities in the City of Lakeland as well as redeveloping challenged neighborhoods that have not been invested in and neglected for some time. LHA and/or its subsidiary entity(s) plans to either partner with other developers or self-develop its properties using HUD’s mixed- finance approach.

LHA envisions a range of options that will be employed to achieve its goal to transform its portfolio which may include but not be limited to: modernization of existing public housing units; demolition of selected units and construction of new units; introduction of market rate and for-sale units; Rental Assistance Demonstration (RAD) Program: acquisition and development of new units in, around and outside of LHA properties; and wholesale redevelopment of its public housing communities. LHA plans to convert all Public Housing ACC Faircloth units to RAD Project Based Vouchers.

LHA was granted Low Income Housing Tax Credits to developed and built a 100-unit’s community (Phase 1) the community is currently fully operational and occupied; this community has replaced approximately 25 units of existing Public Housing units located within the West Lake Apartments community (AMP-1). Additionally, LHA was granted additional Low-Income Housing Tax Credits (LIHTC) for Phase 2 to develop 132 units, the community is currently fully operational and occupied, 64 existing Public Housing units were disposed and demolished. The Agency is currently working on Phase 3 to replace the remaining 34 Public Housing units located within the West Lake Apartments community, all 34 units will be disposed and demolished and replaced with 84 LIHTC units, 80 of those units will be HCV Project Based Vouchers. More specifically LHA plans to submit applications for the next rounds of the Florida Housing Finance Corporation LIHTC application season, for our Public Housing Developments in the coming year(s).

To expedite the closure of its 10 plus year old HOPE VI Grant, LHA requested HUD to amend the Revitalization Plan and associated budget revisions as required. LHA is working with its auditing and finance firms on the following options for closeout of the grant:

- Micro-Cottages: The authority has developed and built a 48 affordable housing units’ community and a community building with a combination of RHF funds from FY 2009 – 2014 and/or HOPE VI funds. The community is fully operational and 100% occupied.
- Cecil Gober, Renaissance and Carrington Place Modernization: These three communities must go through a modernization process. The GPNA and PNA that was performed for the sites supports modernization of the sites. As part of the modernization, LHA is seeking to correct deficiencies outlined by the GPNA and a most recent PNA as well as reconfigure the units. The agency has secured a HUD approved loan to start the remedial modernization process for Renaissance.
- Renaissance 15 lots: LHA is working to build additional Low-Income Housing to help with the demand for affordable housing.

	<ul style="list-style-type: none"> West Lake Apartments (Third Phase): LHA will be submitting a mixed-finance application/proposal to HUD and will pursue the construction of new Public Housing/Mixed Financed units using Low Income Housing Tax Credits and Public Housing funds earmarked for the development of Affordable Housing. The First and Second Phases are fully operational and occupied. <p>Any balance of remaining CFP funds received to date, along with future CFP grant funding, will be accumulated and used for the potential redevelopment of LHA's other public housing communities and/or for other projects under the mixed-finance development approach. Additional acquisitions of vacant land or other existing rental properties, adjacent to current public housing sites may also be initiated, subject to submission and approval by HUD of the appropriate development proposals. Note that "Forced Labor" will be our first choice when performing any construction, repairs and/or replacement of systems.</p> <p>Other mixed-finance transactions (via acquisition or new construction or both) may be proposed later in the Plan commensurate with the LHA Strategic Plan. Financing may include use of regular Capital Funds and/or HUD's Capital Fund Financing Program (CFFP) and/or private financing and/or any other available financing or loan program. CFFP/RAD involves borrowing against future flow of annual Capital Funds.</p> <p>LHA plans to pursue public housing/mixed financed/market development activities and will utilize its Development Department and/or other subsidiary entities for development, financing, and the formation of a variety of ownership structures as well as utilize its management entity for the operation of public and non-public housing programs.</p> <p>The Authority intends to use Capital Funds and other public and private funds to redevelop existing or new family and/or elderly developments. LHA will either self-develop or partner with a master developer for Westlake Apartments and/or other (s) site (s) and conduct a community engagement process to arrive at a master plan for redevelopment.</p> <p>LHA will continue to self-develop and operate affordable housing. Some of the proposed self-developing project will either be located on the 10.56-acre site located on W. 10th Street (120 affordable condos or townhomes will be built for sale or for rent depending on the type of financing), the 4 acres site within the downtown area of the city of Lakeland, and other sites that are currently under review for future development. The Housing Authority obtained SAC HUD Approval to sell the 17.06-acre site at Hunter field PUD (Arbor Manor), sale closed on June 17, 2022. The HA is researching building additional affordable housing for sale or rent at the John Wright Homes or Washington Ridge 15 vacant lots or any other available site. LHA also intends to use Capital Funds and other funds to acquire and redevelop properties in and around its public housing communities. LHA may also use Capital Funds to purchase affordable housing within the Polk County Area.</p>
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Demolition and/or Disposition and/or Development/Projects (New and existing)

This section describes whether HUD-approved applications by LHA to demolish or dispose (sell) public housing projects owned by LHA and subject to Annual Contributions Contracts (ACCs), or pending applications for demolition or disposition, have changed during the current plan year.

In such cases, LHA would be required to describe the housing and the number of affected units for which it will apply or has pending for demolition or disposition; and provide a projected timetable for the demolition or disposition. Information on planned and pending demolition and/or disposition efforts is provided in the following tables.

LHA has been working with residents and the City of Lakeland to define a strategy for the Cecil Gober rehabilitation project, Arbor Manor sale, the West Lake Apartments disposition, the Section 8 Homeownership program, the 10th Street project, the Renaissance at Washington Ridge rehabilitation project, the Dakota rehabilitation project, (other future projects) and the Section 32 Public Housing Homeownership program. The Section 32 disposition plan for the 12 houses at Hampton Hills was approved by the Special Application Center in November 2013. The implementing agreement was executed in March 2014. LHA will amend the agreement as needed to implement the strategy. Individual houses within the Hampton Hills community may be sold to qualified residents, retained as public housing, or sold to third parties in accordance with the strategy and HUD regulations. Note: All the houses within the Hampton Hills community were sold, the project is considered closed.

LHA will include the vacant lots in this process as well. Specifically, LHA sold the 17.3-acre tract within the Hunter field and plans to develop the land located on the 10.56-acre site on W. 10th Street in house. The sales or cash proceeds from both properties will be used to develop, acquire, or modernize affordable housing units at other properties owned and/or controlled by LHA or its affiliates.

Table #1 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: Hampton Hills Houses
 - 1b. Development (project) number: FL01100004
 - 2. Activity type: Disposition
 - 3. Application status (select one)
 Approved
 Submitted, pending approval
 Planned application
 - 4. Date application approved, submitted, or planned for submission: 11/14/2014
 - 5. Number of units affected: 12 (Sold 12)
 - 6. Coverage of action (select one)
 Part of the development
 Total development:
 - 7. Timeline for activity: 48 months
a. Actual or projected start date of activity: 7/1/2012 b. Projected end date of activity: 05/31/2022: **Project is closed.**
- Note*: Section 32 Approved Disposition

Table #2 Demolition/Disposition/Modernization Activity Description

- 1a. Development name: West Lake Apartments (Phase 1 completed) (Phase 2 completed) (Phase 3 relocation completed)
- 1b. Development (project) number: FL01100001
- 2. Activity type: Demolition
Disposition:
- 3. Application status (select one) Approved
 Submitted, (**pending approval for Phase 3**)
 Planned application
- 4. Date application **approved, submitted, or planned for submission: Phase one- 4/2017, Phase two- 04/2018, Phase three- 2019**

5. Number of units affected: 120
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 1/01/2011
b. Projected end date of activity: 12/31/2024
Note*: SAIL LIHTC Approved Phase 1 and 2, we are planning on using up to 80 HCV Project Based Vouchers for Phase 3.

Table #3 Modernization Activity Description

1a. Development name: Cecil Gober Villas
1b. Development (project) number: FL01100001
2. Activity type: Modernization: X
3. Application status (select one) Approved
Submitted, pending approval.
Planned application: X
4. Date application approved, submitted, or planned for submission: 12/1/2015
5. Number of units affected: 37
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 12/01/2015
b. Projected end date of activity: 12/31/2023
Note*: Capital Funds will be used.

Table #4 Demolition/Disposition/Modernization Activity Description

1a. Development name: Arbor Manor (Hunter field PUD)
1b. Development (project) number: FL01100001
2. Activity type: Disposition: X
3. Application status (select one) Approved Submitted, pending approval: X Planned application
4. Date application approved, submitted, or **planned for submission**: 2020-2023
5. Number of units affected: 0
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 2020
b. Projected end date of activity: 06/17/2022
Note*: **Land sold**. Funds received from the sale will be used to develop or purchase additional "Affordable Housing".

Table #5 Demolition/Disposition/Modernization Activity Description

1a. Development name: 10th Street in front of Colton Meadow Apartments, Lakeland, Polk County, Florida
1b. Development (project) number: FL01100001
2. Activity type: Disposition: X
3. Application status (select one) Approved
Submitted, pending approval.
Planned application: X.
4. Date application approved, submitted, or **planned for submission**: 2020-2024
5. Number of units affected: 0
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 2021
b. Projected end date of activity: 12/31/2022-24
Note*: Planning to build up to 120+ Affordable Condos/Townhomes for sale or rent depending on the funding or loan conditions.

Table #6 Development Activity Description

1a. Development name: 15 Vacant Parcels at Washington Park, FL29P011003, HOPE VI Site
1b. Development (project) number: FL01100003
2. Activity type: Disposition: X
3. Application status (select one) Approved
Submitted, pending approval: X Planned application:
4. Date application approved, submitted, or planned for submission: 11/12/2014
5. Number of units affected: 0
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 2023
b. Projected end date of activity: 12/31/2022-25
Note*: Funding pending

Table #7 Demolition/Disposition/Modernization Activity Description

1a. Development name: Vacant Parcels at John Wright Homes
1b. Development (project) number: FL01100001
2. Activity type: Disposition: X
3. Application status (select one) Approved
Submitted, pending approval: **X Planned application:**
4. Date application approved, submitted, or planned for submission: 2023
5. Number of units affected: 0
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 2023
b. Projected end date of activity: 12/31/2025
Note*: Funding pending

Table #8 Demolition/Disposition/Modernization Activity Description

1a. Development name: Dakota Park Apartments
1b. Development (project) number: FL01100002
2. Activity type: Demolition-Disposition: X
3. Application status (select one) Approved
Submitted, pending approval: **X Planned application:**
4. Date application approved, submitted, or planned for submission: 2023
5. Number of units affected: 20 or 40 depending on funding or financing type.
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 2022
b. Projected end date of activity: 12/31/2024
Note*: Funding pending, considering RAD conversion.

Table #9 Demolition/Disposition/Modernization Activity Description

1a. Development name: Renaissance at Washington Ridge
1b. Development (project) number: FL01100003
2. Activity type: Demolition-Disposition: X
3. Application status (select one) Approved
Submitted, pending approval: **X Planned application:**
4. Date application approved, submitted, or planned for submission: 2021
5. Number of units affected: 108 or 196 depending on funding or financing type.
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 2021
b. Projected end date of activity: 12/31/2023
Note*: Funding pending, considering RAD conversion

Table #10 Demolition/Disposition/Modernization Activity Description

1a. Development name: 4 Acres Downtown
1b. Development (project) number: FL01100001
2. Activity type: Demolition-Disposition: X
3. Application status (select one) Approved
Submitted, pending approval: **X Planned application:**
4. Date application approved, submitted, or planned for submission: 2022
5. Number of units affected: 100 to 120 depending on funding or financing type.
6. Coverage of action (select one)
Part of the development
Total development: X
7. Timeline for activity:
a. Actual or projected start date of activity: 2021
b. Projected end date of activity: 12/31/2023
Note*: Funding pending

Table #11 Demolition/Disposition/Modernization Activity Description

1a. Development name: City of Mulberry Project- Park Ridge
1b. Development (project) number: FL01100001
2. Activity type: Demolition-Disposition: X
3. Application status (select one) Approved
Submitted, pending approval: **X Planned application:**
4. Date application approved, submitted, or planned for submission: 2022
5. Number of units affected: 92 to 96 with up to 20 Project Based Vouchers and LIHTC.
6. Coverage of action (select one)
Part of the development

Total development: X

7. Timeline for activity:

a. Actual or projected start date of activity: 2022

b. Projected end date of activity: 12/31/2023

Note*: Funding pending

Project-Based Vouchers

This section describes the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

A PHA can use up to 20 percent (20 percent of the total number of vouchers, note that any project based vouchers used within a 62 and over senior community are excluded from the mandatory 20 percent pursuant HUD rules and regulations) of its authorized voucher units to project-base units in a specific project if the owner agrees to either rehabilitate or construct the units, or the owner agrees to set-aside a portion of the units in an existing development. In certain cases, the PHA may use an additional 10 percent of its authorized voucher units for PBV assistance if units serving homeless; veterans; providing supportive housing for elderly or disabled; or located in areas where vouchers are difficult to use.

When funding becomes available, the Authority plans to use some of its vouchers under the Project Based Vouchers (PBV) option, as described at 24 CFR Part 983. This may be done in one of two ways.

First, LHA may issue a Request for Proposals from owners wishing to participate in the program. The criteria and procedures for such selections will be described in the RFP and in the LHA's Section 8 Administrative Plan.

Second, LHA may make non-competitive selections of owners whose projects included a competitive selection of proposals, such as housing assisted under a federal, state, or local government housing assistance, community development, or supportive services program.

The Authority may also submit a proposal under an RFP for units in its public housing portfolio or a property it may acquire under its —redevelopment authority for this purpose. The use of PBV is consistent with the overall PHA Plan, which is encouraging the development of affordable mixed-use, mixed-income housing particularly in consort with broader neighborhood revitalization efforts such as the Westlake project and other sites.

LHA's PBV criteria and procedures will propose the use of these resources in ways that facilitate achievement of its overall housing goals in general and the mobilization of potential relocation resources, to address the housing needs of LHA families at developments slated to be redeveloped, including, but not limited to, the Cecil Gober Villas, Dakota Park (Carrington Place) and Westlake Apartments projects and/or other similar communities and situations.

Under the HUD Asset Management Model, some of LHA's developments are not financially sustainable because insufficient Annual Contract Contribution (ACC) subsidy is received from HUD to support their operations. LHA is currently evaluating options for restructuring the properties; possibly seeking to convert these properties to Project-based Section 8 communities through RAD.

LHA may project-base units or convert all of LHA's communities to RAD including but not limited to Carrington Place, John Wright, Cecil Gober, Twin Lakes Estates, any new development and Renaissance at Washington Ridge Development project (s). LHA is also planning on utilizing the full available Faircloth allowable maximum number of units to convert or develop new affordable units.

LHA utilized 80 project-based vouchers within the final phase of the West Lake Apartments Low Income Housing Tax Credit project and 99 for the Manor at West Bartow this 179 PBV units are exempted from the total number of units calculated using the maximum 20% of the PHA Consolidated Annual Contract pursuant HUD rules and regulations as these units are set aside for Elderly and Disabled families. 18 PBV are being utilized at Villas of Lake Bonnet for families. The PHA Consolidated Annual Contract counts with 1656 Section 8 units, the PHA can convert up to 20% (330 Vouchers) of these units into PBV. Additionally, another 10% (165) can be converted following the below requirements. Based on the before mentioned Project Based Vouchers numbers the PHA vouchers conversion availability is 298.

Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21] The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories if the total number of units does not exceed the 10 percent cap.

Units qualify under this exception if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless.
- Are specifically made available to house families that are comprised of or include a veteran. - Veteran means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent Census.

Notice PIH 2015–05 (Project-Based Voucher (PBV) Guidance):

a. "Section I – Timely Reporting of the Family Report (form HUD-50058 and form HUD 50058 MTW) into the Inventory Management System/Public Indian Housing Information Center (IMS/PIC) and Timely Submission into the Voucher Management System (VMS) for Project Based Vouchers" is adopted with updates to VMS reporting per page 6 of 67 VMS User's Manual release 8.9.0.0 (April 2016). (Appendix III)

b. "Section II – Maximum Amount of PBV Assistance (20 Percent Limit) in the PBV Program and PHA Submission requirements under 24 CFR 983.6(d)" is superseded by HOTMA, under which a PHA may project base up to 20 percent of its Consolidated Annual Contributions Contract authorized units, instead of 20 percent of its voucher budget authority. This notice revises the requirements for PHA notification to HUD of the intent to project-base.

Notice PIH 2015–10 (Project-Basing HUD-Veterans Affairs Supportive Housing (VASH) Vouchers. HOTMA authorizes PHAs to project-base Family Unification Program (FUP) and HUD-Veterans Affairs Supportive Housing (VASH) vouchers without requiring additional HUD approval. Prior to HOTMA, PHAs were prohibited from project-basing vouchers awarded for FUP. HUD-VASH vouchers could be project-based but required HUD review and approval in accordance with Notice PIH 2015–10 (this applied to HUDVASH vouchers the PHA chose to project-base and not to HUD-VASH units awarded under a HUD-VASH PBV allocation as described in Attachment F of this notice). HOTMA authorizes a PHA to attach PBV assistance to not more than 20 percent of its ACC authorized units instead of 20 percent of its voucher budget authority. For purposes of this provision, the term "authorized units" means the number of units under the PHA's current ACC.

B.3

Progress Report.

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

The Housing Authority of the City of Lakeland is meeting its Mission to provide quality, affordable housing, and self-sufficiency opportunities in an effective and professional manner by passing every HUD inspection/audit and staying in compliance with HUD, State and Local rules and regulations. Additionally, we are actively working on meeting our goals as follow:

Goal #1: Increase the number of affordable housing units by at least 50%. We were able to build 100 Senior units for PHASE 1 of the Twin Lakes Development and PHASE 2 with 132 units of affordable housing. PHASE 3 is seeking funding to add another 78 to 82 units. The Williamstown Community added 48 Public Housing) was approved, built, and is now fully occupied. The agency is planning to develop 120 condos or townhomes for sale or rent on the 10th Street site and is selling the mixed-use land at the Arbor Manor site, the proceeds will be used to continue developing more affordable housing. We are in the planning stages of developing other communities that will be named soon. Develop and/or purchase another 1000 home units of affordable housing.

Goal #2: Maintain and/or obtain the "High Performer" status in Public Housing and Section 8. We were designated a Standard Performer Agency for Public Housing and High Performer Agency for the Housing Choice Voucher Program on the most recent evaluation.

Maintain a public housing vacancy rate of 5% or less. LHA has been able to maintain the vacancy at or below 3%. Maintain an average work order response time of less than three days. Collect at least 95% of the rent and other charges excluding fraud recovery and major tenant abuse due to LHA. Reduce utility usage (including water) by 25% by December 31, 2027.

Maintain a Section 8 lease-up rate of at least 98% while not exceeding HUD limitations. Continue and improve task tracking / management by objectives. Enhance internal operations to reduce costs, improve efficiencies, and become even more effective and professional.

Goal #3: Maintain and improve our public image through enhanced communication, coordination, and accountability with outside entities, among the staff and with residents.

Goal #4: Be the premier innovative and effective affordable housing provider in Florida.

Apply for additional housing choice vouchers as they become available.

Seek out new funding opportunities as they become available including but not limited to LIHTC. Develop, rehab and/or build new communities in all LHA owned land or parcels and re-develop the West Lake Apartments community, John Wright Homes, Carrington Place, Renaissance at Washington Ridge and other future projects to be name in the near future.

Implement and run a successful Section 8 Homeownership program.

Incorporate non-traditional entrepreneurial methods and practices that positively impact affordable housing in LHA's jurisdiction. Incorporate financially feasible Green and Sustainability Best Practices in all future developments. Obtain at least \$10 million in grants and/or leveraging from all sources by December 31, 2023.

Goal #5: Increase and encourage the self-sufficiency efforts of all residents. (On-going)

Increase the usage of LHA educational and computer literacy programs by 25% by December 31, 2023. Substantially increase the number of LHA seniors and people with disabilities using LHA sponsored programs by December 31, 2023.

Goal #6: Maintain a high level of employee relations and morale. (On-going)

Enhance lines of communications through staff meetings and other necessary internal communications to provide updates and progress reports about agency activities.

Continue to reward performance through the timely implementation of a performance management system and the incentive pay program. Continue to operate as a management and realty company incentivizing the staff (s) through bonuses, commissions, and other forms of profit sharing.

Encourage and support staff partaking in training and continuing education opportunities to the greatest degree possible within funding constraints.

Conduct an annual employee satisfaction survey and update the salary charts.

The Housing Authority of the City of Lakeland continues to comply with the Violence Against Women Act ("VAWA") which protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation. The Housing Authority of the City of Lakeland applies the VAWA policy to all programs funded by the U.S. Department of Housing and Urban Development.

<p>B.4</p>	<p>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.</p> <p>The 5-year action plan for 2018 to 2022 was approved by HUD on 06/20/2019. The new 5-year 2023 to 2027 plan will be entered into EPIC for HUD approval. The “Forced account” method will be used as a way of saving funds while servicing the communities and making the necessary maintenance repairs and/or modernization work including but not limited to capital items, replacement of systems, etc....</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p>C.5</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>

D.	Affirmatively Furthering Fair Housing (AFFH).		
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="180 459 1451 997"> <tr> <td data-bbox="180 459 1451 499">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="180 499 1451 997"> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>The HACL is committed to affirmatively furthering fair housing by:</p> <ul style="list-style-type: none"> ● Conducting an analysis to identify impediments to fair housing choice; ● Taking appropriate actions to overcome the effects of any impediments identified through this analysis; and ● Maintaining records reflecting the analysis and actions taken. The objectives of this process are broad, including ● Analyzing and eliminating housing discrimination in the jurisdiction; ● Promoting fair housing choice for all persons; ● Providing opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability or national origin; ● Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and ● Fostering compliance with the nondiscrimination provisions of the federal Fair Housing Act. </td> </tr> </table>	Fair Housing Goal:	<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>The HACL is committed to affirmatively furthering fair housing by:</p> <ul style="list-style-type: none"> ● Conducting an analysis to identify impediments to fair housing choice; ● Taking appropriate actions to overcome the effects of any impediments identified through this analysis; and ● Maintaining records reflecting the analysis and actions taken. The objectives of this process are broad, including ● Analyzing and eliminating housing discrimination in the jurisdiction; ● Promoting fair housing choice for all persons; ● Providing opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability or national origin; ● Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and ● Fostering compliance with the nondiscrimination provisions of the federal Fair Housing Act.
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<p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>The HACL is committed to affirmatively furthering fair housing by:</p> <ul style="list-style-type: none"> ● Conducting an analysis to identify impediments to fair housing choice; ● Taking appropriate actions to overcome the effects of any impediments identified through this analysis; and ● Maintaining records reflecting the analysis and actions taken. The objectives of this process are broad, including ● Analyzing and eliminating housing discrimination in the jurisdiction; ● Promoting fair housing choice for all persons; ● Providing opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability or national origin; ● Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and ● Fostering compliance with the nondiscrimination provisions of the federal Fair Housing Act. 			

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(l)). 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(l))

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 §903.23(b))

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

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

Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

Mixed Finance Modernization or Development. 1) A description of any housing (including 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 units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (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 a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7.](#) (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03.](#) (24 CFR §903.7(c))

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

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

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

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

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

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved.

PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

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

C. Other Document and/or Certification Requirements.

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

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

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

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

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.

Civil Rights Certification
(Qualified PHAs)

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

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning January 1, 2022 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintains records reflecting these analyses and actions.

Lakeland Housing Authority
PHA Name

FL011
PHA Number/HA Code

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

Name of Executive Director: Benjamin Stevenson		Name of Board Chairperson: Don Brown	
Signature	Date	Signature	Date

The United States Department of Housing and Urban Development is authorized to collect 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. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 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.

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Carlos R. Pizarro An, the Senior Vice-President of Housing

Official's Name

Official's Title

certify that the 5-Year PHA Plan for fiscal years 2023 and/or Annual PHA Plan for fiscal year 2023 of the Housing Authority of the City of Lakeland is consistent with the

PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

Polk County/City of Lakeland

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

1. Inclusive community and housing, 2. Capital Improvements, 3. Attractive and environmentally friendly communities, 4. Develop housing that is safe and affordable for all residents including but not limited to seniors, young professionals, and families.
5. To encourage greater mix of income in neighborhoods and to assist in fair housing efforts, the City will continue to support the Lakeland Housing Authority's applications for additional funding for its Section 8, subsidized housing program
6. Assist the City of Lakeland with their Analysis of impediments to fair housing choices, it will be reviewed every five years in conjunction with the update of the City's Consolidated Plan and Strategy for expenditure of federal funding. Plans will be developed and implemented on an ongoing basis to remove identified impediments to fair housing choice to the greatest extent possible.

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

Name of Executive Director: Benjamin Stevenson

Name Board Chairperson: Don Brown

Signature

Date

Signature

Date

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

The Housing Authority of the City of Lakeland Request for Board Action

1. Describe Board Action Requested and why it is necessary:

Re: Resolution # 22-1515

The Board of Commissioners is requested to authorize the Executive Director to submit a Significant Amendment and/or Modification of the 2022 LHA Annual Plan to the U.S. Department of Housing and Urban Development.

2. Who is making request:

- A. Entity: The Housing Authority of the City of Lakeland
- B. Project: Significant Amendment and/or Modification of the LHA Annual Plan
- C. Originator: Carlos Pizarro

3. Cost Estimate:

N/A

Narrative:

Significant Amendment and/or Modification to the Five-Year Plan and/or Annual Plan:

A Significant Amendment and/or Modification to the Annual Plan is a change in policy pertaining to the operation of the Housing Authority (HA). The HA will consider the following actions as a Significant Amendment and/or Modification to the Five-Year Plan and/or Annual Plan:

Amendment to HCV Administrative Plan
Lakeland Housing Authority

The Lakeland Housing Authority is amending its PHA Annual Plan to include new activity related to the issuance of Project-Based Vouchers to the project known as Twin Lake Estates Phase III. If the project will be using Project-Based Vouchers (PBV), the PHA Plan Template HUD-50075-ST requires the PHA to provide the projected number of project-based units and general locations and describe how adding PBV would be consistent with the PHA Plan.

- a) Projected number of project-based units: 80
- b) Location: Twin Lakes Estates, Phase III, 501 Hartsell Avenue, Lakeland, Polk County, Florida 33815
- c) Twin Lakes Estates Phase III complies with the PHA goals to deconcentrate poverty and expand housing and economic opportunities and is consistent with Site and Neighborhood Standards for new construction.

Project Overview

Twin Lakes Estates, Phase III ("Phase III") is the last phase of a master plan to redevelop West Lake Apartments, a 120-unit obsolete public housing complex built in the 1940s. Combined, the three phases of the West Lake Apartments redevelopment will return 318 affordable units to the community (24 ACC, 80 senior PBV, 80 replacement family PBV, and 134 LIHTC). Phases I and II were completed in 2018 and 2020, respectively, and are fully occupied.

Phase III redevelopment plan will consist of 86 multi-family affordable housing units distributed in four four-story buildings on a 3.17-acre lot. To deconcentrated poverty, 77 will be LIHTC affordable housing units for households at sixty percent (60%) of Area Median Income (AMI) and nine units will be LIHTC affordable housing units for households at forty percent (40%) of AMI. In addition, Phase III will be expanding housing and economic opportunities by building 86 units where, previously, there were only 32 units. The neighborhood is not in a qualified census tract and is not an area of minority concentration. In addition, the site has access to public transportation, and services and community amenities like those of market rate units.

The new units will replace West Lake Apartments public housing units demolished in Phases II and III and receive Project-Based Voucher assistance. The former residents will receive priority preference for return to the redeveloped property if they desire to return.

The ownership structure for the proposed project includes LHA as the lessor of a 65-year ground lease. In addition, affiliate entities of the LHA and HTG formed a Limited Partnership named Twin Lakes III, Ltd. to own and operate the project.

We will attach the new policy to the 2022 Approved Agency Plan as required.

RESOLUTION NO. 22-1515

THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF LAKELAND APPROVES AND AUTHORIZES THE EXECUTIVE DIRECTOR TO SUBMIT A SIGNIFICANT AMENDMENT AND/OR MODIFICATION TO THE 2022 PHA ANNUAL PLAN

WHEREAS, the U.S. Department of Housing and Urban Development requires that any significant amendment to the Agency Plan be approved by the Board of Commissioners; and

WHEREAS, The Housing Authority of the City of Lakeland is amending its PHA 2022 Annual Plan to include new activity related to the issuance of Project-Based Vouchers to the project known as Twin Lake Estates Phase III. If using Project-Based Vouchers (PBV), the PHA Plan Template HUD-50075-ST requires the PHA to provide the projected number of project-based units and general locations and describe how project basing would be consistent with the PHA Plan. a) Projected number of project-based units: 80, b) Location: Twin Lakes Estates, Phase III, 501 Hartsell Avenue, Lakeland, Polk County, Florida 33815, c) Twin Lakes Estates Phase III complies with the PHA goals to deconcentrate poverty and expand housing and economic opportunities and is consistent with Site and Neighborhood Standards for new construction; and

WHEREAS, the Lakeland Housing Authority is eligible to project based 80 units; and

WHEREAS, the Lakeland Housing Authority will be expanding housing and economic opportunities by building 86 units where, previously, there were only 32 units.; and

WHEREAS, the Lakeland Housing Authority is in compliance with U.S. Department of Housing and Urban Development rules and regulations; and

NOW, THEREFORE, BE IT RESOLVED, the Board of Commissioners of the Housing Authority of the City of Lakeland, hereby, authorize the Executive Director to proceed with the amendment and/or modification to the 2022 Agency Plan.

CERTIFICATE OF COMPLIANCE

This is to certify that the Board of Commissioners of the Housing Authority of the City of Lakeland has approved and adopted Resolution No. 22-1515, dated July 18, 2022.

Attested by:



Benjamin Stevenson, Executive Director



(For:)
Don Brown, Chairman

Annual Plan Attachment No. 1-2022

Criteria for Substantial Deviation and Significant Amendments

24 CFR Part 903.7 (r) (2)

Significant Amendment or Modification to the Five-Year Plan and/or Annual Plan:

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minority concentration. In addition, the site has access to public transportation, and services and community amenities like those of market rate units.

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We will attach the new policy to the 2022 Approved Agency Plan as required.



Signature of the Executive Director

7/10/2022
Date


Signature of Chairman-Board of Commissioners

7/18/2022
Date

NOTICE OF PUBLIC MEETINGS AND PUBLIC HEARING
Lakeland Housing Authority
FY 2022 Agency Plan Significant Amendment

The Lakeland Housing Authority (LHA) has scheduled one public meeting to discuss a Significant Amendment to the FY 2022 Agency Plan specifically the Housing Choice Voucher Administrative Plan with the general public at 9:00 a.m. on May 20th, 2022, at the LHA Administrative Offices, 430 Hartsell Avenue, Lakeland.

The Public Hearing is scheduled for May 20th, 2022, at 9:00 a.m.

LHA has developed its Agency Plan in accordance with the Quality Housing and Work Responsibility Act of 1998 including, but not limited to, additional updates received from the Department of Housing and Urban Development.

The Significant Amendment for the Housing Choice Voucher Program is available for review at the above address between the hours of 8:00 a.m. and 5:00 p.m., Monday through Thursday, beginning on May 9, 2022. The Significant Amendment to the Agency Plan will be posted for 45 days or until June 24th, 2022. Inquiries and comments may be directed to Carlos Pizarro, Senior Vice-president of Housing, at cpizarro@lakelandhousing.org and/or Sendia Garcia, at Sgarcia@lakelandhousing.org and/or Florida Relay services at 711 and/or by visiting: www.LakelandHousing.org.

Copies of the Significant Amendment to the Agency Plan will only be available for review at the at the main LHA office:

430 Hartsell Avenue, Lakeland, Florida 33815

The Housing Authority of the City of Lakeland dated May 9, 2022.

L2022 05/09-2022-Public and Legal Notice





2023 PROCUREMENT POLICY

The Procurement Policy hereinafter set forth must function within the limits set forth by Federal Statutes, the Annual Contributions Contract with HUD, and the laws of the State of Florida. Any and all applicable changes in the law or contract or judicial decision of interpretation or constitutionality will automatically supersede this policy. Such changes will be reflected in a policy revision as appropriate.

I. **GENERAL:** The purpose of this Statement of Procurement Policy is to assure that goods, services, and construction are procured, and surplus goods are disposed of at the most favorable prices to the Housing Authority of the City of Lakeland, Florida ("LHA") and its Instrumentalities and Partnerships but not limited to any current or future endeavor in full compliance with the applicable HUD regulations and State and local laws.

II. PROCUREMENT AUTHORITY AND ADMINISTRATION

A. The Executive Director shall administer the procurement policy or other individuals authorized by him/her. The Executive Director shall be responsible for developing procedures to implement this procurement policy. The Executive Director or his/her designee shall be the depository of all related records.

B. It is the Executive Director's responsibility to ascertain that (1) the yearly procurements are adequately and timely planned, (2) the procurement documents clearly specify the desired products, construction, and services, as well as the methods of award, (3) the solicitation procedures are conducted in full compliance with the Federal regulations (or state and local laws whichever are more stringent), (4) the awards are made to the responsive and responsible bidders offering the lowest prices, and (5) there are sufficient unencumbered funds for each procurement to defray the costs of the contracts.

C. The Executive Director shall establish written procedures to monitor the procurement actions ensuring compliance with this Statement of Procurement Policy and to prevent fraud and abuse.

D. This policy and any changes thereto shall be submitted to the Board of Commissioners ("Board") for approval and if/when requested the HUD Field Office shall be furnished with a copy of each.

III. PROCUREMENT METHODS

Purchases and contracts for equipment, materials, supplies, or services, shall be made in the following manner.

A. Small Purchase Procedure.

1. The Housing Authority of the City of Lakeland has streamlined its policy to include HUD's policies:
 - An increase in the small purchase threshold in accordance with revisions to HUD Rules and Regulations;
 - The establishment of a micro-purchase threshold (Threshold as determined by HUD), requiring only one reasonable quote (consistent with the Federal Acquisition Regulations);
 - The use of "incorporation by reference" of mandatory contract clauses into bid specifications and contracts;
 - The elimination of any required forms for small purchases, with the exception of applicable maintenance and construction contracts exceeding the minimum/maximum as determined by HUD may be set lower by State statute;
 - The use of a simplified contract for construction work that does not exceed any updated minimum/maximum amount as determined/published by HUD may be set lower by State statute;
 - The elimination of the requirement to conduct a separate cost/price analysis when obtaining products or services of a commercial nature.
2. Petty Cash Purchases. Expenditures may be made from the Petty Cash Fund providing for small purchases only and not to exceed \$600 for any one purchase, and no more than one purchase of any item may be made in one month. The basis for petty cash purchases shall be for minor emergency items or a third-party meeting refreshment (s) only as determined by the Executive Director or his/her designee.
3. (Micro) purchases amount will always be in line with the minimum/maximum allowed under the direction of the Department of Housing and Urban Development effective on the date the new limits are published. (Micro Purchases) or may be set lower by applicable State statute. The Executive Director may delegate to the appropriate staff personnel, the authority to make purchases and contracts, not to exceed the maximum/minimum amount as approved and published by HUD, in the open market after such inquiry as they deem necessary to ensure that the prices obtained are the most advantageous to LHA. Contract requirements shall not be artificially divided so as to constitute a small purchase under this section. (See HUD Guidelines for limits)
4. Small purchases amount will be determined and in line with the

minimum/maximum allowed under the direction of the Department of Housing and Urban Development effective on the date the new limits are published or may be set lower by applicable State statute. For purchases and contracts under the small purchase threshold, the Executive Director may delegate to the appropriate staff personnel of LHA to solicit bids by mail, in-person, email or orally (recorded by LHA in writing) or by telephone (recorded by LHA in writing), from at least three (3) suppliers, if so, many are available, covering identical material specifications. They shall document both the solicitation made and the quotations received by requiring written, emailed, or faxed follow-up documentation from the vendors to substantiate quotations given and by maintaining a file of such documents. (See HUD Guidelines for limits)

5. Competitive proposals may be solicited in accordance with paragraphs (A) 2, (A) 3 and (A) 4. The procurement criteria will be documented.

B. Sealed Bidding.

1. Conditions For Use, purchases over the minimum/maximum amounts as approved and published by HUD. Contracts shall be awarded based on competitive sealed bidding if the following conditions are present: a complete, adequate, realistic specification or purchase description is available; two or more responsible bidders are willing and able to compete effectively for the work; the procurement lends itself to a firm fixed price contract; and the selection of the successful bidder can be made principally on the basis of price.
2. Solicitation and Receipt of Bids. An invitation for bids shall be issued including specifications and contractual terms and conditions applicable to the procurement, including a statement that the award will be made to the lowest responsible and responsive bidder whose bid meets the requirements of the invitation for bids. The invitation for bid will be advertised in, at least, two newspapers of general circulation and, if advantageous, by making invitations to bid to all known and available bidders. The invitation for bid shall state the time and place for both the receipt of bids and the public bid opening. All bids received shall be time stamped but not opened and shall be stored at a secure place until bid opening. A bidder may withdraw its bid at any time prior to bid opening.
3. Bid Opening and Award. Bids shall be opened publicly and in the presence of, at least, one witness. An abstract of bids shall be recorded, and the bids shall be made available for public inspection in accordance with State law. Awards shall be made as provided in the invitation for bids by written notice to the successful bidder. If equal low bids are received from responsible bidders, drawing lots or similar random

method shall make award, unless otherwise provided in the invitation for bids. If only one responsive bid is received from a responsible bidder, award shall not be made unless a cost or price analysis verifies the reasonableness of the price.

4. Consistent with the requirements of 2 CFR Part 200 and in order to promote efficiency and competition in procurement of goods and services, LHA may enter into relationships with other governmental agencies, public housing authorities, and regional or national intergovernmental purchasing networks or associations. The purpose of a cooperative intergovernmental relationship is to take advantage of a competitive selection process already conducted by a governmental agency or public housing authority and thus save LHA the time and expense of conducting its own selection process. In evaluating the use of a cooperative intergovernmental relationship, LHA shall review for reasonableness the standards in the competitive selection process conducted by the governmental agency or public housing authority.
5. Mistakes in Bids. (A) Correction or withdrawal of inadvertently erroneous bids may be permitted, where appropriate, before bid opening by written or telegraphic notice received in the office designated in the invitation for bids prior to the time set for bid opening. After bid opening, corrections in bids shall be permitted only if the bidder can show by clear and convincing evidence that a mistake of a nonjudgmental character was made, the nature of the mistake, and the bid price actually intended. A low bidder alleging a nonjudgmental mistake may be permitted to withdraw its bid if the mistake is clearly evident on the face of the bid document, but the intended bid is unclear, or the bidder submits convincing evidence that a mistake was made. (B) All decisions to allow correction or withdrawal of bid mistakes shall be supported by a written determination signed by the contracting officer. After bid opening, no changes in bid prices or other provisions of bids prejudicial to the interest of LHA or fair competition shall be permitted.
6. Purchases under Federal, State, and Local Governmental Contracts. LHA may enter into any available governmental agreement to procure under (Federal, State, County, or City) contracts. The agreement shall stipulate that LHA is authorized to procure through such governmental agreement and can be in letterform.

C. Competitive Proposals.

1. Conditions for Use. Competitive proposals (including turnkey proposals for development) may be used if there is an adequate method of evaluating technical proposals and where LHA determines that conditions are not appropriate for the use of sealed bids. An adequate number of qualified sources shall be solicited. Indefinite delivery

contracts will be solicited by competitive proposal.

2. Solicitation. A Request for Proposals is a written solicitation for sealed proposals and giving a designated public opening date. The request for proposals shall clearly identify the evaluation factors and their relative importance and shall be published. A mechanism for fairly and thoroughly evaluating the technical and price proposal shall be established before the solicitation is issued. The proposals shall be evaluated, and the responsible firm whose qualifications, price and other factors considered, are the most advantageous to LHA, shall be awarded the contract.
3. Mandatory Forms/Contract Provisions. The following forms, which contain all mandatory contract provisions, must be included with the solicitation/bid package. (Note: the forms listed below assume that competitive proposals are used for procuring non-construction services. Only under limited circumstances would construction services be procured by competitive proposals.)
 - a. Form HUD-5369-B, *Instructions to Offerors–Non-Construction*.
 - b. Form HUD-5369-C, *Certifications and Representations of Offerors –Non-Construction Contract*.
 - c. Form HUD-5370-C, *General Conditions for Non-Construction Contracts*.
4. Negotiations. Unless there is no need for negotiations with any of the offerors, negotiations shall be conducted with offerors who submit proposals determined to have a reasonable chance of being selected for award, based on evaluation against the technical and price factors as specified in the request for proposals. Such offerors shall be accorded fair and equal treatment with respect to any opportunity for negotiation and revision of proposals. The purpose of negotiations shall be to seek clarification with regard to and advise offerors of the deficiencies in both the technical and price aspects of their proposals so as to assure a full understanding of and conformance to the solicitation's requirements. No offeror shall be provided information about any other offeror's proposal, and no offeror shall be assisted in bringing its proposal up to the level of any other proposal. Offeror shall not be directed to reduce their proposed prices to a specific amount in order to be considered for award. A common deadline shall be established for receipt of proposal revisions based on negotiations.
5. Award. The award shall be made to the responsive offeror whose proposal is determined to be the most advantageous to LHA, taking into consideration price and the other evaluation criteria set forth in the

Request for Proposals.

D. Architect/Engineer Procurement.

1. Procurement of professional services within the scope of the practice of architecture, professional engineering, landscape architecture, or registered surveying and mapping shall be procured in accordance with Florida Statute Section 287.055 known as the "Consultants Competitive Negotiation Act."
2. LHA will publicly announce when the agency will procure professional services and solicit qualified firms or individuals to submit proposals for the work.
3. Once the proposals are received the agency will rank order the top three firms based on the announced and published criteria for evaluation. In determining whether the firm is qualified the agency shall consider such factors as the ability of the professional personnel, whether the firm is a certified minority business enterprise, past performance, willingness to meet time and budget requirements, location, recent, and current and projected workloads of the firms and the volume of work previously awarded to each firm by the agency with the object of effecting an equitable distribution of contracts among qualified firms.
4. Once the firms are rank ordered LHA will competitively negotiate a contract. LHA will negotiate with the topped ranked firm. If LHA is unable to reach a satisfactory contract with the firm considered to be most qualified at a price LHA deems to be fair, competitive, and reasonable, negotiations with that firm will be formerly terminated and the agency will then undertake negotiations with the second most qualified firm. Failing to reach an agreement with the second most qualified firm, those negotiations will then be terminated, and LHA will negotiate with the third qualified firm. If LHA is unable to reach a satisfactory contract with any of the top three ranked firms, it may select additional firms in the order of their competence and qualification and continue negotiations until an agreement is reached.

E. Non-Competitive Proposals.

1. Conditions for Use. Procurements shall be conducted competitively to the maximum extent possible. Procurement by noncompetitive proposals may be used only when the award of a contract is not feasible using small purchase procedures, sealed bids, or competitive proposals and one of the following applies:
 - a. The item is available only from a single source, based on a good faith review of available sources;

b. An emergency exists that seriously threatens the public health, welfare, or safety, or endangers property, or would otherwise cause serious injury to LHA, as may arise by reason of a flood, earthquake, epidemic, riot, equipment failure, or similar event. In such cases, there must be an immediate and serious need for supplies, services, or construction such that the need cannot be met through any other procurement methods, and the emergency procurement shall be limited to those supplies, services, or construction necessary to meet the emergency;

c. HUD authorizes the use of noncompetitive proposals; or

d. After solicitation of a number of sources, competition is determined to be inadequate.

2. Justification. Each procurement based on noncompetitive proposals shall be supported by a written justification for using such procedures. The Executive Director or his/her designee shall approve the justification in writing.

3. Price Reasonableness. The reasonableness of the price for all procurements based on noncompetitive proposals shall be determined by performing a cost analysis as described in paragraph III F.

4. Determination of Emergency. The following procedures will be used in determining if an emergency situation exists:

a. The appropriate Manager or Supervisor shall verbally notify the Executive Director or his/her designee of the complete circumstances of the situation as far as he/she knows them and request that an emergency be declared. A written follow-up by the appropriate Manager or Supervisor should be submitted to the Executive Director or his/her designee as soon after the emergency as possible.

b. Once the Executive Director verifies the emergency situation, he/she will advise LHA's Chairman of the Board or the Chairman's designee as to the circumstances surrounding the situation.

c). The Executive Director will inform the entire Board of the emergency situation as soon as feasibly possible or at, the very latest, the next regular meeting.

F. Cost and Price Analysis

1. General. A cost or price analysis shall be performed for all procurement actions except those under paragraphs III A. (1), (2), and (3), including contract modifications. The method of analysis

shall be determined as follows. The degree of analysis shall depend on the facts surrounding each procurement.

2. **Submission of Cost or Pricing Information.** If the procurement is based on noncompetitive proposals or when only one offer is received or for other procurements as deemed necessary by LHA, the offeror shall be required to submit:
 - a. a cost breakdown showing projected cost and profits;
 - b. commercial pricing and sales information, enough to enable LHA to verify the reasonableness of the proposed price as a catalog or market price of a commercial product sold in substantial quantities to the general public; or
 - c. documentation showing that law or regulation sets the offered price.
3. **Cost Analysis.** Cost analysis shall be performed if an offeror/contractor is required to submit a cost breakdown as part of its proposal. When a cost breakdown is submitted: A cost analysis shall be performed of the individual cost elements; LHA shall have the right to audit the contractor's books and records pertinent to such costs; and profit shall be analyzed separately. Costs shall be allowed only to the extent that they are consistent with applicable federal cost principles (for commercial firms, Subpart 31.2 of the Federal Acquisition Regulation, 48 CFR, Chapter 1). In establishing profit, LHA shall consider factors such as the complexity and risk of the work involved, the contractor's investment and productivity, the amount of subcontracting, the quality of past performance, and industry profit rates in the area for similar work.
4. **Price Analysis.** A comparison of prices shall be used in all cases other than those described in paragraph III. F.1. above.

G. Contractor Qualifications

1. **Contractor Responsibility.** LHA shall not award any contract until the prospective contractor, i.e., low responsive bidder or successful offeror, has been determined to be responsible. A responsible bidder/offeror must:
 - a. Have adequate financial resources to perform the contract or the ability to obtain them;

- b. Be able to comply with the required or proposed delivery or performance schedule, taking into consideration all the bidder's/offeror's existing commercial and governmental business commitments;
- c. Have a satisfactory performance record;
- d. Have a satisfactory record of integrity and business ethics;
- e. Have the necessary organization, experience, accounting and operational controls, and technical skills or the ability to obtain them;
- f. Have the necessary production, construction, and technical equipment and facilities or the ability to obtain them; and,
- g. Be otherwise qualified and eligible to receive an award under applicable laws and regulations including not be suspended, debarred or under a HUD-imposed Limited Denials of Participation.

If a prospective contractor is found to be non-responsible, a written determination of non-responsibility shall be prepared and included in the official contract file, and the prospective contractor shall be advised of the reasons for the determination.

- 2. **Suspension and Debarment.** Contracts shall not be awarded to debarred, suspended, or ineligible contractors. Contractors may be suspended, debarred, or determined to be ineligible by HUD in accordance with HUD regulations or by other State or Federal agencies, e.g., Dept. of Labor for violation of labor regulations.
- 3. **Vendor Lists.** All interested businesses shall be given the opportunity to be included on vendor mailing lists. Any lists of persons, firms, or products which are used in the purchase of supplies and services (including construction) shall be kept current and include enough sources to ensure competition.

H. Assistance to Small and Minority Business Enterprises/Woman Business Enterprises (MBE/WBE)

- 1. Consistent with Presidential Executive Orders 11625, 12138, and 12432 and Section 3 of the HUD Act of 1968, all feasible efforts shall be made to ensure that small and minority-owned businesses, women's business enterprises, and other individuals or firms located in or owned in substantial part by persons residing in the area of the LHA project are used when possible. Such efforts shall include, but shall not be limited to:

- a. Including such firms, when qualified, on solicitation mailing lists;
- b. Encouraging their participation through direct solicitation of bids or proposals whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such firms;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by such firms;
- e. Using the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce;
- f. Including in contracts, to the greatest extent feasible, a clause requiring contractors, to provide opportunities for training and employment for lower income residents of the project area and to award subcontracts for work in connection with the project to business concerns which provide opportunities to low-income residents, as described in **24 CFR Part 135** (so-called Section 3 businesses); and
- g. Requiring prime contractors, when subcontracting is anticipated, to take the positive steps listed above.
- h. Goals shall be established periodically for participation by small businesses, minority-owned businesses, women-owned business enterprises, labor surplus area businesses, and Section 3 business concerns in LHA prime contracts and subcontracting opportunities.

2. Definitions

- a. A **small business** is defined as a business that is: independently owned; not dominant in its field of operation; and not an affiliate or subsidiary of a business dominant in its field of operation. The size standards in **13 CFR Part 121** should be used to determine business size.
- b. A **minority-owned business** is defined as a business which is, at least, 51% owned by one or more minority group members or, in the case of a publicly owned business, one in which, at least, 51% of its voting stock is owned by one or more minority group members, and whose management and daily business operations are controlled by one or more such individuals. Minority group members include, but are not limited to Black Americans, Hispanic Americans, Native

Americans, Asian Pacific Americans, Asian Indian Americans, and Hasidic Jewish Americans.

- c. A **women's business enterprise** is defined as a business that is, at least, 51% owned by a woman or women who are U.S. citizens and who control and operate the business.
- d. "**Section 3 business concern**" is as defined under **24 CFR Part 135**.

I. General

1. With respect to the purchases and contracts specified in paragraph III. A. above, the appropriate staff shall make the purchase from or award the contract to the lowest responsible bidder as to price--who meets the requirements. Price shall be considered for these purposes to include delivery charges and discounts including any discounts for prompt payment.
2. No purchases or contracts specified in paragraph III. A. (2), A. (3), and A (4) shall be made without certification of an official designated by the Executive Director that the expenditure is duly budgeted and that the funds are available, except in case of an emergency. Circumstances of such exception due to emergency shall be documented in a formal report submitted to the Board together with a certification or statement justifying the purchase or contract under the circumstances.
3. All procurement of equipment, materials, supplies, and repairs of service shall be documented. Expenditures in excess of the small purchase maximum limits as set by HUD shall be made by formal contract, except that those purchases made under Federal, State, or local governmental agency contract, if such are in effect, may be made by purchase order regardless of the amount.
4. All contracts shall be reviewed and signed by the Executive Director or designee.
5. The Executive Director or his/her designee shall serve as the Contracting Officer of LHA
6. All *Specifications* or *Statement/Scope of Work* shall describe the work or services required. They shall be written as to not restrict competition to one vendor. A *specification* is a detailed description of materials, supplies, equipment, pre-cuts, or construction work to indicate to prospective contractors precisely what LHA desires to purchase. A *statement* or *scope of work* (SOW) is normally used for contracts for services, such as accounting or payroll services, energy audits, consultant, legal or A/E services, well as non-professional services such

as maintenance and grounds keeping. The primary purpose of a SOW is to provide a basis for mutual understanding between LHA and the offeror and subsequent contractor of LHA's requirements.

7. Termination for Cause and for Convenience (contracts of \$10,000 or more).

LHA shall incorporate the following clauses in contracts of \$10,000 or more:

- a. LHA may terminate any contract in whole or from, time to time, in part, for LHA's convenience or the failure of the Contractor to fulfill the contract obligations (cause/default). LHA shall terminate by delivering to the Contractor a written Notice of Termination specifying the nature, extent, and effective date of the termination. Upon receipt of the notice, the Contractor shall: (1) immediately discontinue all services affected (unless the notice directs otherwise) and (2) deliver to LHA all information, reports, papers, and other materials accumulated or generated in performing the contract, whether completed or in process.
- b. If the termination is for the convenience of LHA, LHA shall be liable only for payment for services rendered before the effective date of the termination.
- c. If the termination is due to the failure of the Contractor to fulfill its obligations under the contract (cause/default), LHA may (1) require the Contractor to deliver to it, in the manner and to the extent directed by LHA, any work described in the Notice of Termination; (2) take over the work and prosecute the same to completion by contract or otherwise, and the Contractor shall be liable for any additional cost incurred by LHA; and (3) withhold any payments to the Contractor for the purpose of set-off or partial payment, as the case may be, of amounts owned by LHA by the Contractor. In the event of termination for cause/default, LHA shall be liable to the Contractor for reasonable costs incurred by the Contractor before the effective date of the termination. Any dispute shall be decided by LHA's Executive Director or designee.

8. All contracts shall contain the following forms as applicable:

- a. HUD Table 5.1, *Mandatory Contract Clauses for Small Purchases other than Construction*;

- b. HUD-5370, *General Conditions for Construction Contracts—Public and Indian Housing Programs*;
 - c. HUD-5370-C, *General Conditions for Construction Contracts, Section I* (with or without Maintenance Work);
 - d. HUD-5370-C, *General Conditions for Construction Contracts, Section II* (with Maintenance Work);
 - e. HUD-5370-EZ, *General Conditions for Small Construction/Development Contracts*;
 - f. HUD-51915, *Model Form of Agreement Between Owner & Design Professional*; and
 - g. the mandatory Section 3 contract clause found at 24 CFR 135.38.
9. Record Retention. LHA shall retain all significant and material documentation and records concerning all procurements it conducts. These records will be retained for a period of three years after final payment and all matters pertaining to the contracts are closed. If any claims or litigation are involved, the records shall be retained until all issues are satisfactorily resolved.
10. Prohibited Contract Types— *cost-plus-a-percentage-of-costs* and *percentage-of-construction-cost method* contracts shall not be used.

J. Bonding Requirements

The standards under this section apply to construction contracts that exceed the minimum threshold amount as determined and published by HUD for purchases above the Small Purchase threshold. There are no bonding requirements for small purchases or for competitive proposals. LHA may require bonds in these latter circumstances when deemed appropriate; however, non-construction contracts should generally not require bid bonds.

- 1. Bid Bonds: For construction contracts exceeding the minimum threshold amount as determined and published by HUD for purchases above the Small Purchase threshold, offerors shall be required to submit a bid guarantee from each bidder equivalent to 5% of the bid price.
- 2. Payment Bonds: For construction contracts exceeding the minimum threshold amount as determined and published by HUD for purchases above the Small Purchase threshold, the successful bidder shall furnish an assurance of completion. This assurance may be any one of the

following four, unless state or local laws or regulations require a higher level of guarantee, in which case such higher level shall apply:

- a. A performance and payment bond in a penal sum of 100% of the contract price; or
 - b. Separate performance and payment bonds, each for 50% or more of the contract price; or
 - c. A 20% cash escrow; or
 - d. A 25% irrevocable letter of credit.
3. These bonds must be obtained from guarantee or surety companies acceptable to the U. S. Government and authorized to do business in the State where the work is to be performed. Individual sureties shall not be considered. U. S. Treasury Circular Number 570 lists companies approved to act as sureties on bonds securing Government contracts; the maximum underwriting limits on each contract bonded; and the states in which the company is licensed to do business. Use of companies on this circular is mandatory.

K. Insurance Requirements

Unless waived by LHA's Executive Director or designee and prior to signing any contract/agreement, the vendor must provide a current certificate(s) of General Liability insurance and Vehicular Liability insurance of, at least, \$1,000,000 per occurrence with LHA named as an *additional insured* as well as a current certificate of Workers Compensation insurance for entire staff to be employed by the vendor on the site of this project. If federal, state or local rules or regulations require higher insurance coverage, then such higher coverage requirement shall apply. The successful respondent shall maintain these insurances in force during the term of the contract.

V. DISPOSITION OF EXCESS PROPERTY

Property no longer necessary for the LHA's purposes (non-real property) shall be transferred, sold, or disposed of in accordance with applicable Federal, state, and local laws and regulations.

VI. AFFIRMATIVE ACTION PLAN

Positive efforts shall be made by the Executive Director to use small, minority-owned and women-owned businesses, and labor surplus area firms for supplies and services. Such efforts shall include, but shall not be limited to:

1. developing a bidder's mailing list for these sources, and encouraging

them in the form of direct invitation to compete for contracts; and

2. assuring them that their participation in the bidding procedures is solicited whenever they are potential sources.

VII. APPEALS AND REMEDIES

The restoration of disputes arising from the solicitation and award of procurement contracts, bid protests, and contract performance claims shall be conducted in full compliance with the applicable HUD, Federal and State regulations. Efforts shall be made to resolve all disputes at LHA level.

VIII. CODE OF CONDUCT

- A. No employee, officer, or agent of LHA shall participate in the selection or in the award or administration of any contract if a conflict--real, apparent, or implied--would be involved. Such conflict would arise when financial or other interest in a firm selected for award is held by:
 1. an employee, officer, or agent involved in making the award;
 2. any member of his/her immediate family;
 3. his/her partner; or
 4. an organization that employs or is about to employ any of the above.
- B. LHA officers, employees, or agents shall not solicit or accept gratuities, favors, or anything of monetary value from vendors, contractors, or parties to subcontracts.

Amendment to HCV Administrative Plan

Lakeland Housing Authority

The Lakeland Housing Authority is amending its Housing Choice Voucher Administrative Plan to include the term “Project” in the Plan’s glossary and new policy to Chapter 17, Project Based Vouchers, in connection with the Authority’s intent to attach PBV assistance to the project known as Twin Lake Estates, Phase III.

Glossary:

The term “**project**” means a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land.

Chapter 17 describes HUD regulations and PHA policies related to the project-based voucher (PBV) program in nine parts. The following parts are amended.

Part I, General Requirements, Units not Subject to the PBV Program Limitations [FR Notice 1/18/17] (Page 17-4)

Current Provisions:

PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them. In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after April 18, 2017.

Part II.F, Cap on Number of PBV Units in Each PBV Project, Projects not Subject to a Project Cap [FR Notice 1/18/17; Notice PIH 2017-21] (Page 17-17)

Current Provisions:

PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV assistance

New Provisions in Addition to Current Provisions:

PBV assistance provided to these units does not count against the 20 percent program cap and may be used to project-base up to 100 percent of the units in the project.

PIH 2017-21 (HA) and HOTMA, Sec. 106(a)(2) provides that certain units do not count toward the PBV percentage limitation (Program Cap) and are exempt from the income-mixing requirement (Project Cap) when PBV assistance is attached to them.

New PHA Policy:

The PHA intends to project-base up to 80 units not subject to the Program Cap and Project Cap at the Twin Lakes Estates, Phase III project.

Project Overview

Twin Lakes Estates, Phase III (“Phase III”) is the last phase of a master plan to redevelop West Lake Apartments, a 120-unit obsolete public housing complex built in the 1940s. Combined, the three phases

of the West Lake Apartments redevelopment will return 318 affordable units to the community (24 ACC, 80 senior PBV, 80 replacement family PBV, and 134 LIHTC). Phases I and II were completed in 2018 and 2020 respectively and are fully occupied.

Phase III redevelopment plan will consist of 86 affordable family housing units distributed in four four-story buildings on a 3.17-acre lot. Of the total units, 77 will be LIHTC affordable housing units for households at sixty percent (60%) of Area Median Income (AMI) and nine units will be LIHTC affordable housing units for households at forty percent (40%) of AMI. The new units will replace West Lake Apartments units demolished in phases II and III and receive Project-Based Voucher assistance. The former residents will receive priority preference for return to the redeveloped property if they choose to return.

The LHA entered into a Master Development Agreement with the Housing Trust Group (HTG) for the redevelopment project. The ownership structure for the proposed project includes LHA as the lessor of a 65-year ground lease. In addition, affiliate entities of the LHA and HTG formed a Limited Partnership named Twin Lakes III, Ltd. to own and operate the project.

Phase III complies with PHA goals to deconcentrate poverty and expand housing and economic opportunities and is consistent with Site and Neighborhood Standards for new construction.

Exemption Criteria

The proposed PBV units at Phase III are exempt from both Program and Project Caps because they will replace West Lake Apartments units, Phases II and III, meeting the required criteria as stated below:

- a. The West Lake Apartment Units were Public Housing units receiving Capital and Operating funds under Section 9 (Colton/Bonnei, FL011000001)
- b. The units received HUD assistance no more than 5 years from the written notice of owner selection/AHAP contract. HUD issued inventory removal approvals for 66 units in April 2019 and 32 units in July 2020. The signing of the AHAP contract is expected for the second quarter of 2022.
- c. The proposed PBV units at Phase III will be located on the same site as the units they are replacing. Phase III and Phase II are adjacent sites meeting the definition of "same site".
- d. The primary purpose of Phase III is to replace the public housing units that previously existed at the original project, consisting of West Lake II (66 units) and West Lake III (32 units). Consequently, the former residents of the original project will be provided with a selection preference that provides the residents with the right of first occupancy at Phase III, including PBV and non-PBV units.
- e. The number of proposed PBV units (80) is less than the number of units in the original project (98). *
- f. LHA has structured the bedroom distribution at the Twin Lakes States project to address the needs of the community and households on the LHA waiting list and the overall community need for affordable housing
- g. The proposed PBV units at Twin Lakes States III is consistent with the PHA Plan, the goals of deconcentrating poverty and expanding housing and economic opportunities, site selection, and civil right requirements.

Phase	Inventory Removal Approval	Removed PH units
Phase I (West Lake I)	2015	22
Phase II (Lake Beulah) **	4/3/2019	66
Phase III (Twin Lakes Estates) ***	7/14/2020	32
Total		120

New Units			
Non-ACC	ACC	PBV	Total
10	10	80	100
118	14	0	132
6	0	80	86
134	24	160	318

*, **, *** Phase II and III are adjoining parcels constituting the original project subject to the intent to attach PBV to Twin Lakes Estates, Phase III. The total number of proposed rent-assisted units (94), including 14 ACC in Phase III and the 80 PBV units in Phase III, is less than the number of units in the original project (98). Phase I was carved out from the site more than five years ago; therefore, it is excluded from the number of Phase III PBV units subject to the project cap calculation.

Part II, PBV Owner Proposals, Units Selected Non-Competitively [FR Notice 1/18/17; Notice PIH 2017-21; 24 CFR 983.51(b)] (Page 17-8)

Current Provisions:

For certain public housing projects where the PHA has an ownership interest or control, the PHA may attach PBV assistance non-competitively without following one of the two processes above. This exception applies when the PHA is engaged in an initiative to improve, develop, or replace a public housing property or site. The public housing units may either currently be in the public housing inventory or may have been removed from the public housing inventory within five years of the date on which the PHA entered into the AHAP or HAP. If the PHA is planning rehabilitation or new construction on the project, a minimum threshold of \$25,000 per unit in hard costs must be expended. If the PHA plans to replace public housing by attaching PBV assistance to existing housing in which the PHA has an ownership interest or control, then the \$25,000 per unit minimum threshold does not apply as long as the existing housing substantially complies with HQS. The PHA must include in the administrative plan what work it plans to do on the property or site and how many PBV units will be added to the site.

New Provisions in Addition to Current Provisions:

HOTMA Sec. 106 (a)(9)) overrides the regulatory requirements for selection of PBV proposals at 24 CFR 983.51(b) and allows a PHA to attach PBV assistance to units in a project in which the PHA has an ownership interest or over which the PHA has control without following a competitive process.

For purposes of this authority, a PHA ownership interest also includes a scenario in which the PHA is the lessor of the ground lease for the land upon which the PBV project to improve, develop, or replace the public housing property is located or will be constructed (PHI 2017-21 (HA))

New PHA Policy:

LHA intends to attach up to 80 PBVs to the Twin Lakes Estates project, as described above (Project Overview). The proposed project does not require a competitive process because the PHA will have an interest ownership in it.

The Lakeland Housing Authority is partnering with Housing Trust Group (HTG), under a Master Development Agreement, to redevelop the site known as West Lake Apartments, formerly a 120-unit public housing site approved for demolition and disposition under Section 18 by HUD. The Twin Lakes Estates, Phase III project will replace units from West Lake Apartments Phases II and III, which HUD approved for demolition and disposition on April 3, 2019, and July 7, 2020 respectively. The execution of an AHAP contract is anticipated for the second quarter of 2022.

The ownership structure for the proposed project includes LHA as the lessor of a 65-year ground lease. In addition, LHA, through a subsidiary, will be the Sole General Partner.

Twin Lakes Estates will consist of 86 units of which 80 will be West Lake Apartments, Phases I and II, replacement units and six units will be LIHTC. Twin Lakes Estates will be in a portion of the former West Lake Apartments site designated as Phase III. The replacement units will be new construction exceeding the minimum threshold of \$25,000 in hard cost per-unit and substantially comply with HUD's housing quality standards as described in LHA's Administrative Plan.

Amendment to HCV Administrative Plan

Lakeland Housing Authority

The Lakeland Housing Authority is amending its PHA Annual Plan to include new activity related to the issuance of Project-Based Vouchers to the project known as Twin Lake Estates, Phase III.

If using Project-Based Vouchers (PBVs), the PHA Plan Template HUD-50075-ST requires the PHA to provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

- a. Projected number of project-based units: 80
- b. Location: Twin Lakes Estates, Phase III, 501 Hartsell Avenue, Lakeland, Polk County, FL 33815
- c. Twin Lakes Estates, Phase III complies with the PHA goals to deconcentrate poverty and expand housing and economic opportunities and is consistent with Site and Neighborhood Standards for new construction.

Project Overview

Twin Lakes Estates, Phase III (“Phase III”) is the last phase of a master plan to redevelop West Lake Apartments, a 120-unit obsolete public housing complex built in the 1940s. Combined, the three phases of the West Lake Apartments redevelopment will return 318 affordable units to the community (24 ACC, 80 senior PBV, 80 replacement family PBV, and 134 LIHTC). Phases I and II were completed in 2018 and 2020 respectively and are fully occupied.

Phase III redevelopment plan will consist of 86 affordable family housing units distributed in four four-story buildings on a 3.17-acre lot. To deconcentrated poverty, 77 will be LIHTC affordable housing units for households at sixty percent (60%) of Area Median Income (AMI) and nine units will be LIHTC affordable housing units for households at forty percent (40%) of AMI. In addition, Phase III will be expanding housing and economic opportunities by building 86 units where, previously, there were only 32 units. The neighborhood is not in a qualified census tract and is not an area of minority concentration. In addition, the site has access to public transportation, and services and community amenities like those of market rate units.

The new units will replace West Lake Apartments public housing units demolished in phases II and III and receive Project-Based Voucher assistance. The former residents will receive priority preference for return to the redeveloped property if they choose to return.

The LHA entered into a Master Development Agreement with the Housing Trust Group (HTG) for the redevelopment project. The ownership structure for the proposed project includes LHA as the lessor of a 65-year ground lease. In addition, affiliate entities of the LHA and HTG formed a Limited Partnership named Twin Lakes III, Ltd. to own and operate the project.



Analysis of Impediments to Fair Housing Choice

Housing Authority of the City of Lakeland

Annual Agency Plan 2023

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1. Introduction/Executive Summary

The mission of the Housing Authority of the City of Lakeland (HACL), FL-011, is to provide quality, affordable housing, and self-sufficiency opportunities in an effective and professional manner, in the City of Lakeland and Polk County, Florida.

The HACL receives federal funds annually from the U.S. Department of Housing and Urban Development (HUD). Under this relationship, HUD requires all Public Housing Authorities (PHA) to prepare Agency Plans, including an Annual Plan. These Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families. The HACL's current Annual Plan covers the time period of January 1, 2023, through December 31, 2023. As part of the PHA Plan, the HACL consults with the City of Lakeland, and other stakeholders regarding any identified impediments to housing choice and to develop a plan to address those impediments.

The Fair Housing Act of 1968 required that all HUD programs be administered in a manner that affirmatively furthers fair housing. The HACL is committed to affirmatively furthering fair housing by:

- Conducting an analysis to identify impediments to fair housing choice;
- Taking appropriate actions to overcome the effects of any impediments identified through this analysis; and
- Maintaining records reflecting the analysis and actions taken.

The objectives of this process are broad, including

- Analyzing and eliminating housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability or national origin;
- Promoting housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the federal Fair Housing Act.

By undertaking this review, the Analysis of Impediments document establishes measures for the HACL and serves as:

- A comprehensive review of the HACL's administrative policies, procedures and practices with regard to fair housing opportunities;

- An assessment of how those laws, regulations, policies, and procedures affect the location, availability, and accessibility of housing; and
- An assessment of public and private sector conditions affecting fair housing choice.

The HACL is committed to furthering fair housing choice throughout its public housing communities and all administered programs.

2. Jurisdictional Background Data

The HACL was created by the State of Florida in 1939 pursuant to Florida Statute 421. The HACL manages affordable housing programs that offer many diverse housing and self-sufficiency opportunities to families and individuals residing in the city of Lakeland within Polk County, Florida

Housing Profile

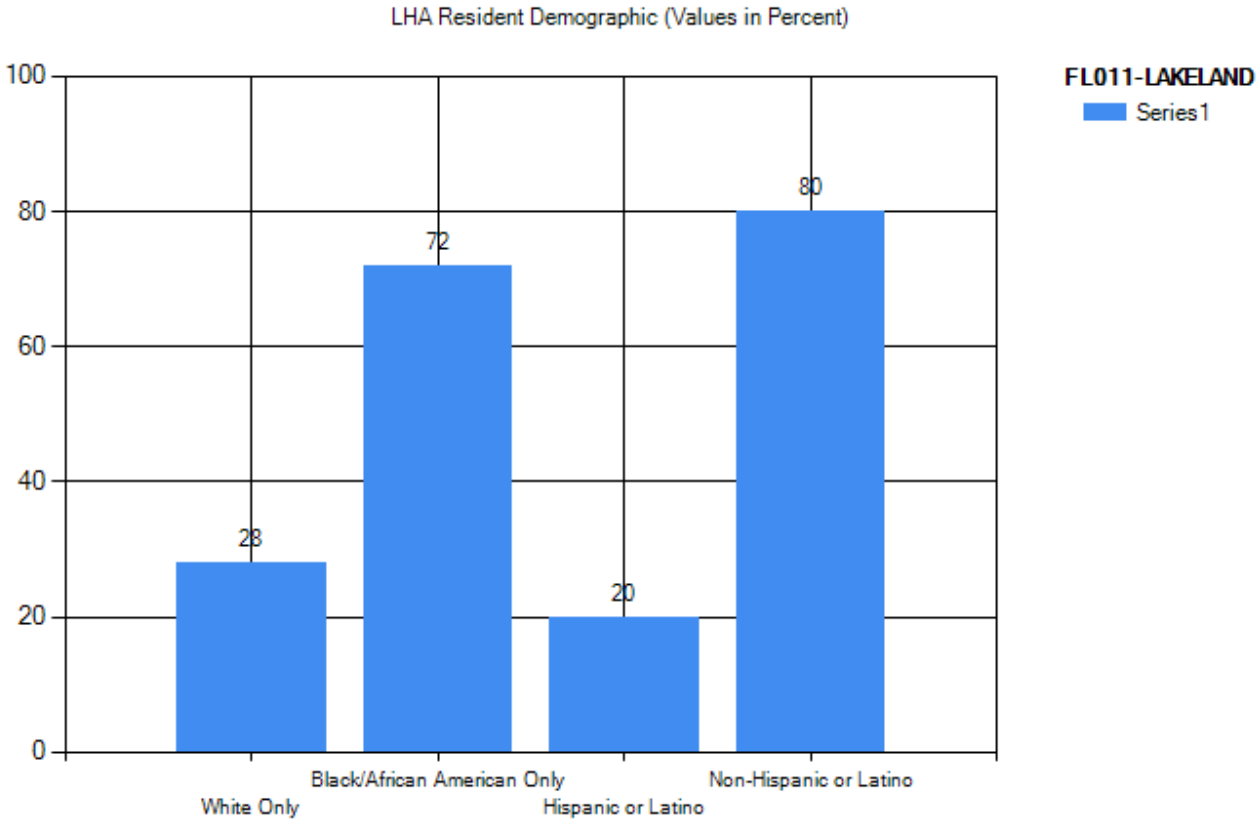
The HACL affordable housing programs include conventional public housing, Section 8 and the mixed income affordable housing opportunities. The HACL Section 8 Program includes 1,585 Housing Choice Vouchers (HCVs) and the agency self-manages all of its communities including the following public housing and mixed income developments:

Public Housing Program		
Community	# Units	Type
John Wright Homes	20	Multi-Family
Cecil Gober Villas	37	Senior
Williamstown	48	Senior
Total	105	

Mixed Income Communities			
Community	#Units	Type	Unit Mix
Dakota Park	40	Multi-Family	20 LIHTC, 20 Public Housing/LIHTC
Washington Renaissance	78	Elderly	48 LIHTC, 30 Public Housing/LIHTC
Washington Renaissance	118	Multi-Family	39 LIHTC, 79 Public Housing/LIHTC
Colton Meadow	72	Multi-Family	LIHTC
Villas at Lake Bonnet Homes	75	Multi-Family	LIHTC with 18 Project based Section 8
The Manor at West Bartow	100	Elderly	LIHTC, 99 Project based Section 8
Twin Lakes Phase 1	100	Elderly	90 LIHTC with 80 PBV and 10 PH/LIHTC
Twin Lakes Phase 2	132	Multi-Family	Under construction715
Twin Lakes Phase 3	84	Multi-Family	Pre-Development
Total	793		

Demographic Data

Demographics for the HACL are reflected below:



Demographics of Public Housing Residents		
	Number of Residents	Comments
Race:		
• Black/African American	528	
• Native Hawaiian/Other Pacific Islander	0	
• White	175	
• American Indian/Alaska Native	0	
• Other	0	
Ethnicity:		
• Hispanic	147	
• Non-Hispanic	556	
Disabled Persons	124	
Head of Household:		
• Male	41	
• Female	239	

Demographics of Section 8 Participants		
	Number of Residents	Comments
Race:		
• Black/African American	2096	
• Native Hawaiian/Other Pacific Islander	1	
• White	1014	
• American Indian/Alaska Native	3	
• Other	4	
Ethnicity:		
• Hispanic	734	
• Non-Hispanic	2384	
Disabled Persons	717	
Head of Household:		
• Male	177	
• Female	1017	

Integration and Segregation

The chart below reflects demographics by HACL's housing communities.

Income Data

The HACL's average household income ranges from a low of \$0.00 to a high of \$50,000.00 with an overall average of \$15,004.00.

3. Evaluation of Jurisdiction's Current Fair Housing Legal Status

There have been no fair housing complaints or fair housing reviews in the last five years. Also, no fair housing discrimination suits have been filed against the HACL.

The Fair Housing Act and the state civil right laws recognize the following seven protected classes as: race, religion, color, sex, familial status, national origin and disability. If, however, a person feels they were discriminated against based on the perception of the person's sexual orientation or gender identity, a claim may be filed under the Fair Housing Act.

4. Considerations for Analysis of Impediments to Fair Housing Choice

As part of the Analysis of Impediments, a questionnaire was completed for programs administered by the HACL. The results are provided in Appendices 1 and 2. In addition, the HACL identified impediments to Fair Housing Choice.

Identified and Potential Impediments

Impediment #1: Isolation due to affordability issues

Section 8 Voucher Program recipients may not seek to live in areas with higher quality housing since landlords may not be willing to rent to lower income individuals. As a result, they may choose housing in specific areas with lower quality housing.

Impediment #2: Ability of low-income households interested in becoming homeowners

Due to low income and credit worthiness, families below the poverty level often find it difficult to purchase homes.

Impediment #3: Public awareness

Individuals may not know how to recognize discrimination and sometimes lack knowledge of Fair Housing Choice, specifically regarding their rights and responsibilities on housing issues.

Impediment #4: Physical accessibility

There is a shortage of inventory and a lack of knowledge regarding rights of those needing physical accessibility accommodations that are reasonable under the fair housing laws.

Impediment #5: Discrimination due to race, ethnicity, gender, disability

The HACL recognizes that there is the potential for discrimination based on race, ethnicity gender and disability. As such, we have identified discrimination as an impediment.

5. Conclusions and Recommended Actions

Impediment #1: Isolation due to affordability issues

Section 8 Voucher Program recipients may not seek to live in areas with higher quality housing since landlords may not be willing to rent to lower income individuals. As a result, they may choose housing in specific areas with lower quality housing.

- Action 1 – Continue to assist Section 8 Voucher Program recipients in efforts to locate higher quality housing.
- Action 2 – Educate and work with landlords to increase the availability of Section 8 properties throughout the city of Lakeland
- Action 3 – When working with developers, encourage mixed income, universal design developments and utilizing the Uniform Federal Accessibility Standards (UFAS).

Impediment #2: Ability of low-income households to purchase housing

Due to low income and credit worthiness, families below the poverty level often find it difficult to purchase homes.

- Action 1 – Encourage and market financial and credit counseling services offered through other entities through the City of Lakeland and Polk County, Florida.
- Action 3 – Continue work with families who have expressed an interest in homeownership.
- Action 4 – Discuss hosting a Housing Fair with banks, social service agencies that assist with financial and credit services and education to aid with housing empowerment.

Impediment #3: Public awareness

Individuals may not know how to recognize discrimination and sometimes lack knowledge of Fair Housing, specifically regarding their rights and responsibilities on housing issues.

- Action 1 – Post information on the HACL's website and facilitate fair housing education.
- Action 3 – Inform/educate landlords through outreach efforts including trainings, meetings, literature and other methods.
- Action 4 – Support consumer education programs, such as homebuyer counseling and education.
- Action 5 – Participate in Fair Housing education efforts.
- Action 7 – Promote Fair Housing month.

Impediment #4: Physical accessibility

There is a shortage of inventory and a lack of knowledge regarding rights of those needing physical accessibility accommodations that are reasonable under the fair housing laws.

- Action 1 – Educate landlords and residents on reasonable accommodations requirements.

- Action 2 – Use of available resources to for necessary accessibility modifications.
- Action 3 – When undergoing substantial rehab of units, use universal design, where possible, to allow individuals to age in place and accessibility.
- Action 4 – When working with developers, encourage mixed income, universal design developments and utilization of the Uniform Federal Accessibility Standards (UFAS).

Impediment #5: Discrimination due to race, ethnicity, gender, disability

- Action 1 – Continue relationship with City of Lakeland and other organizations to promote fair housing.
- Action 2 – Educate staff on recognizing discrimination.
- Action 3 – Educate Staff by attendance in fair housing training.

7. Statement

The Housing Authority City of Lakeland as a recipient of federal funding and in order to comply with Affirmatively Further Fair Housing (AFFH) requirements has conducted an Analysis of Impediments to Fair Housing Choice and affirms that the Housing Authority will support the activities to assure nondiscrimination in the provision of housing.

APPENDICES

Appendix 1

Section 8 Program		
Question	Response	Comments
Has the Section 8 Program been found in noncompliance with any civil rights laws or regulations?	No	
Are there any court suits involving tenant application, selection and assignment policies/procedures?	No	
What is the pattern, by location and family type, of minority and non-minority voucher holders who rent your units?	No	
Are minorities located primarily in minority neighborhoods?	Yes	
What steps does Agency take to promote housing choice across all neighborhoods?	<p>To facilitate tenants moving outside of concentrated minority areas, Agency offered security deposit to persons who choose a unit outside</p> <p>Regular outreach to promote the program to landlords in all areas of jurisdiction. New applicants attend a briefing session prior to Voucher issuance which includes information on choosing a unit including a map of all neighborhoods served</p>	
Assist voucher holders who received their vouchers from Agencies in other jurisdictions?	Yes – if they choose their portability option In instances of portability	
Assist voucher holders with disabilities by providing assistance in locating available accessible housing?	Yes. All families receive the same information Offer a list at orientation of all known rental complexes in Kenton County. Handicapped accessible locations are marked.	

Section 8 Program

Question	Response	Comments
<p>Does the LHA provide up-to-date information about facilities and services available in all neighborhoods in which housing suitable to the needs of the voucher holder is available (locations of schools, day care, health and welfare and other social service agencies)?</p>	<p>Yes. This list is located in the orientation packet that is provided upon request.</p>	
<p>Does the Agency encourage voucher holders, particularly minorities, to look for housing in neighborhoods that are not traditional residential areas for the holder in question?</p>	<p>All families receive the same information.</p> <p>All participants are given neighborhood maps when they come in for the initial briefing. We also maintain a list of available units with landlord contact information, and this is available to all persons with a Voucher. These units typically include a wide variety of neighborhoods.</p>	
<p>Has Agency completed a self-evaluation of its policies, procedures and practices to determine whether they may adversely impact persons with disabilities during the application or tenanting process? If so, have all deficiencies been addressed?</p>	<p>Our policies and procedures are continuously evaluated to ensure we do not adversely impact applicants or tenants.</p> <p>No adverse impact identified</p>	
<p>Has Agency conducted a needs assessment to identify need for accessible units and does it have a transition plan to assure access?</p>	<p>To best serve applicants and tenants, we constantly review our participating units, policies and procedures.</p>	
<p>What steps has the Agency taken to assure that persons with disabilities have access to the same range of housing choices and types as are offered to persons without disabilities?</p>	<p>All applicants and tenants are treated in a fair and consistent manner</p> <p>Information is available to tenants who require special accommodations, and we do our best to ensure their needs are met.</p>	

Appendix 2

Public Housing Questionnaire		
Questions	Response	Comments
Has the PHA been found in noncompliance with civil rights laws or regulations?	No	
Are there any court suits involving tenant application, selection, assignment policies and procedures?	No	
Are there concentrations of racial or ethnic groups in one or more public housing site?	<p>Yes</p> <p>Applications accepted from all persons.</p> <p>The PHA is undertaking a 5-year plan to address redevelopment, modernization and sustainability of all sites.</p> <p>The plan also addresses educational opportunities designed to improve the quality of life and economic position of residents.</p>	
Does the PHA policy permit applicants to state a preference for one or more projects?	<p>Yes</p> <p>All applicants may apply to multiple developments</p>	
Are transfers permitted by current tenants?	<p>Yes</p> <p>Current policy allows for transfers for special accommodations</p>	
Does the PHA permit applicants to reject several units offers without losing their place on the waiting list?	<p>Yes; 2 rejections for good cause, Applicant may remain on list but their application is refiled as of the date of the rejection</p>	

Public Housing Questionnaire

Questions	Response	Comments
What are the PHA's policies for admitting persons with mental or nonphysical disabilities?	Persons are accepted as with any disability	
Has the PHA completed is Section 504 (of the Rehabilitation Act of 1973) assessments of need?	Yes	
Has the PHA completed a self-evaluation of its policies/procedures/practices to determine if they adversely impact persons with disabilities during application or tenanting process?	Yes; completed annually. Not all deficiencies are corrected due to age of properties and loss of Capital Funds	
Has the PHA completed a needs assessment to identify need for accessible units?	Yes	

AFFIRMATIVELY FURTHERING FAIR HOUSING POLICY

It is the policy of the Housing Authority City of Lakeland Housing (HACL) to provide services without regard to race, color, religion, national origin, ancestry, age, sex, familial status, physical handicap or disability.

I hereby certify that the HACL complies with all Fair Housing laws, statutes, regulations and executive orders as enumerated in 24CFR and Section 808 (e)(5) of the Fair Housing Act.

The HACL has examined its programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.

It is the policy of the HACL to comply fully with all Federal, State, and local non-discrimination laws including; the Americans with Disabilities Act; and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the HACL housing programs.

To further its commitment to full compliance with applicable Civil Rights laws, the HACL will provide Federal/State/local information to applicants for and participants in the Section 8 Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the HACL. In addition, all appropriate written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The HACL will assist any family that believes they have suffered illegal discrimination by providing them copies of the Housing Discrimination Form. The HACL will also assist them in completing the form, if requested, and will provide them with the address of the nearest HUD Office of Fair Housing and Equal Opportunity.

The HACL will publicize the availability and nature of the Section 8 Program for extremely low-income, very low and low-income families in a newspaper of general circulation, minority media, and by other suitable means.

The HACL will communicate the status of program availability to other service providers in the community and advise them of housing eligibility factors and guidelines so that they can make proper referral of their clients to the program.

The HACL will hold briefings for landlords and property owners who participate in or who are seeking information about the Section 8 Program. The briefing is intended to:

- Explain how the program works;
- Explain how the program benefits landlords and property owners;
- Explain landlords and property owners' responsibilities under the program. Emphasis is placed on quality screening and ways the HACL helps landlords and property owners do better screening; and
- Provide an opportunity for landlords and property owners to ask questions, obtain written materials, and meet HACL staff.

The HACL will particularly encourage landlords and property owners of suitable housing units located outside of low-income or minority concentration to attend. Targeted mailing lists will be developed, and announcements mailed.

The HACL will post, in each of its offices in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, the following information:

- The Section 8 Administrative Plan;
- Notice of the status of the waiting list (opened or closed);
- Address of all HACL offices, office hours, telephone numbers, TDD numbers, and hours of operation;
- Income Limits for Admission;
- Informal Review and Informal Hearing Procedures;
- Fair Housing Poster; and
- Equal Opportunity in Employment Poster

The HACL will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and regulations pursuant thereto (Title 24 CFR part I), which state that no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance, and will immediately take any measures necessary to effectuate this

agreement. With reference to the real property and structure(s) thereon which are provided or improved with the aid of Federal financial assistance extended to the applicant, this assurance shall obligate the applicant, or in the case of any transfer, the transferee, for the period during which the real property and structure(s) are used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits.

The HACL will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and with implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status or national origin.

The HACL will comply with Executive Order 11063 on Equal Opportunity in Housing and with implementing regulations at 24 CFR Part 107 which prohibit discrimination because of race, color, creed, sex or national origin in housing and related facilities provided with Federal financial assistance.

The HACL will comply with Executive Order 11246 and all regulations pursuant thereto (41 CFR Chapter 601), which state that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in all phases of employment during the performance of Federal contracts and shall take affirmative action to ensure equal employment opportunity. The applicant will incorporate, or cause to be incorporated, into any contract for construction work as defined in Section 130.5 of HUD regulations the equal opportunity clause required by Section 130.15(b) of the HUD regulations.

The HACL will comply with Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701(u)), and regulations pursuant thereto (24 CFR Part 135), which require that to the greatest extent feasible opportunities for training and employment be given to lower-income residents of the project and contracts for work in connection with the project be awarded in substantial part to persons residing in the area of the project.

The HACL will comply with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and with implementing regulations at 24 CFR Part 8, which prohibit discrimination based on disability in Federally-assisted and conducted programs and activities.

The HACL will comply with the Age Discrimination Act of 1975 (42 U.S.C. 6101-07), as amended, and implementing regulations at 24 CFR Part 146, which prohibit discrimination because of age in projects and activities receiving Federal financial assistance.

The HACL will comply with Executive Orders 11625, 12432, and 12138, which state that program

participants shall take affirmative action to encourage participation by businesses owned and operated by members of minority groups and women.

If persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for assistance are unlikely to be reached, the HACL will establish additional procedures to ensure that interested persons can obtain information concerning the assistance.

The HACL will comply with the reasonable modification and accommodation requirements and, as appropriate, the accessibility requirements of the Fair Housing Act and section 504 of the Rehabilitation Act of 1973, as amended.

The HACL is working with the City of Lakeland to eliminate the City of Lakeland's impediments to Fair Housing. The City of Lakeland's actions to correct impediments to fair housing are as follows:

Discrimination Based on Race/National Origin or Disability

The City of Lakeland will ensure that any complaints that are received are forwarded to HUD for investigation. In addition, the City of Lakeland will take the following actions to raise public awareness on this issue.

- Proclaim February of each year Fair Housing Month. Display fair housing posters in all public buildings (ongoing).
- Print and distribute (in English/Spanish) fair housing bookmarkers in their library.
- Provide HUD's Fair Housing Complaint forms at City of Lakeland offices and the library.
- Contact the Board of Realtors and the apartment managers' association to volunteer to participate in fair housing training at their meetings, symposiums, and housing events.
- Continue the practice of providing Fair Housing information at a "both" at public events and symposiums. (ongoing)

Affordable Housing

The City of Lakeland will continue to provide education and outreach to landlords, property owners, realtors, developers, banks and non-profit organizations who provide or develop affordable housing. In addition, the City of Lakeland will continue to seek ways to assist developers and all of those involved in affordable housing in locating land, providing waivers of fees, grants and low interest loans and technical assistance to encourage the development of affordable housing and compliance with fair housing laws. Any agreements executed with affordable housing providers will incorporate the requirements of the equal

opportunity and fair housing laws.

Financial Plan for Accomplishment

The City of Lakeland will continue to set aside funds each year from its entitlement grant to fund Fair Housing activities on an annual basis.

Mechanism for Updates

The Housing Program Office is the lead contact agency, and as such maintains up to date information on all changes of federal, state and local rules. This office will maintain and keep track of changes in legislation and any required applicable actions to ensure compliance with HUD goals and rules.

Commitment from Local Officials

The City of Lakeland City Commission through both its proclamation and funding will provide proof of its commitment to fair housing.



PIH

OFFICE OF PUBLIC & INDIAN HOUSING

Frequently Asked Questions: Implementing the Housing Opportunity Through Modernization Act's (HOTMA) Public Housing Income Limit

January 28, 2022

Overview

These Frequently Asked Questions (FAQs) are related to the implementation of the Housing Opportunity Through Modernization Act's (HOTMA) public housing income limit requirements. HUD is continuing work to complete a final rule for implementation of several HOTMA provisions and expects to publish a final rule in the latter half of 2022. In the absence of the final rule, PHAs have inquired about how to administer the over-income requirements made effective through the 2018 *Federal Register* Notice that implemented section 103 of HOTMA.

The FAQs address the questions HUD has received about the potential for PHAs, on or after January 1, 2022, to terminate over-income public housing families who have been over income for two consecutive years, as required by section 103 of HOTMA. HUD will not enforce the termination requirement until such time that HUD publishes the final rule, and it takes legal effect, so that PHAs and families can make an informed choice related to alternative rent options.

The primary takeaways from the FAQs are as follows:

- 1) HUD will not enforce the 2018 HOTMA Public Housing Income Limit Notice ("2018 Notice") that may under some circumstances require PHAs to terminate families who have been over income for two consecutive years.
- 2) PHAs *may* terminate such families under the Admission and Continued Occupancy Policy (ACOP) formulated in accordance with the 2018 Notice but currently *may not* charge such families an alternative rent while they remain in

the public housing unit. Instead, the families will continue to be considered public housing families and must be offered the option of paying an income-based rent or a flat rent at their next annual reexamination.

- 3) Future implementation of the HOTMA rule will require PHAs to either terminate families who have been over-income for two consecutive years or charge such families an alternative rent, in accordance with a PHA's ACOP.
- 4) HUD will issue separate guidance on the over-income CARES Act waivers.

Please see the below FAQs for more detailed information about the over-income provisions.

Frequently Asked Questions (FAQs)

Q1. Where is the over-income provision in law and what does it provide?

Response: Section 16(a)(5) of the United States Housing Act of 1937 (1937 Act), as amended by section 103 of HOTMA, requires PHAs to terminate or charge an alternative rent to families whose income exceeds the program maximum income limit for two consecutive years. HUD partially implemented section 16(a)(5) through a 2018 *Federal Register* Notice, Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, [83 Fed. Reg. 35,490](#) (July 26, 2018)). The Notice requires PHAs to update their over-income policies (through the ACOP) and to begin enforcement of the section 16(a)(5) over-income limit requirements. However, pursuant to section 16(a)(5)(A)(i)(II), HUD must publish regulations in order for PHAs to charge over-income families who exceed the two consecutive year "grace period" an alternative rent.

HUD published a proposed rule implementing section 16(a)(5), including the alternative rent options in section 16(a)(5)(A)(i), on September 17, 2019, but HUD has not yet published a final rule. Thus, PHAs have not been provided the statutorily mandated choice to offer families the opportunity to remain in their public housing unit and pay the alternative rent. Without the ability to charge over-income families alternative rent, PHAs arguably must, per the 2018 Notice and section 16(a)(5)(A)(ii), terminate all over-income families who exceed the over-income limit for two consecutive years. As a result of this dilemma, HUD is choosing to utilize its inherent administrative authority and discretion to not take any action to enforce termination compliance with the 2018 Notice on PHAs.

Q2. What options does my PHA have as it relates to over-income families?

Response: PHAs may elect to terminate over-income families who exceed the over-income limit for two consecutive years, but they are not required to do so. If a PHA elects not to terminate such over-income families who exceed the over-income limit for two consecutive years, then PHAs must continue to treat such families as public housing families and offer the families the

option of paying an income-based rent or a flat rent at their next annual reexamination. PHAs that elect not to terminate over-income families cannot charge the family Fair Market Rent (FMR) or any other alternative rent.

Once the final HOTMA rule implementing section 16(a)(5)(A)(i) alternative rent options takes legal effect, all over-income families who have exceeded the over-income limit for at least two consecutive years must be either terminated or charged an alternative rent in accordance with the PHA's ACOP.

HUD will issue separate guidance on Navigating the Expiration of the CARES Act Waivers in the area of over-income families.

Q3. Since there is no final alternative rent option, what will HUD do if I choose not to terminate families?

Response: Because HUD has not yet published a final rule effectuating the alternative rent options of section 16(a)(5)(A)(i), HUD is exercising its discretion to not enforce against any PHA any 2018 Notice and section 16(a)(5)(A)(ii) requirement to terminate over-income families who exceed the over-income limit for two consecutive years. HUD will not enforce the termination requirement until such time that HUD publishes the final rule, and it takes legal effect, so that PHAs and families can make an informed choice related to alternative rent options.



**HOUSING AUTHORITY
OF THE CITY OF LAKELAND, FLORIDA**

FAMILY SELF SUFFICIENCY

ACTION PLAN

2022-2023

Housing Authority of Lakeland, Florida
430 Hartsell Avenue, Post Office 1009
Lakeland, Florida 33802
(863) 687-2911
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HOUSING AUTHORITY OF THE CITY OF LAKELAND, FLORIDA

FAMILY SELF SUFFICIENCY PROGRAM

INTRODUCTION

The Housing Authority of the City of Lakeland, Florida (LHA) is the quasi-government agency created for the oversight of Housing Urban Department (HUD) funding included, but not limited to Public Housing and Housing Choice Voucher Programs (HCV).

The Housing Choice Voucher Program is the major program that the LHA provides in assisting very-low-income families to afford decent, safe, and sanitary housing in the private market. Additionally, LHA offers housing assistance to -- Section 9 – Public Housing, Section 8 – HCV including special purpose vouchers that include: Foster Youth to Independence (FYI), Veteran Administration Supporting Housing (VASH), Emergency Housing Vouchers (EHV), Mainstream, Project Base Vouchers (PBV) and Section 8 – Homeownership Vouchers. Participants can find their own housing, including apartments, townhouses and single-family. The participant is free to choose any private rental housing that meets the requirements of the program. The LHA will provide Section 8 Vouchers to all program participants as outlined, under CFR 984.101 for housing assistance. A family that is issued a Housing Voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. Rental units must meet minimum standards of quality and safety as determined by HUD. A housing subsidy is paid by the Public Housing Authority to the landlord directly on behalf of the family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program based on their income.

LHA CURRENT STATUS - HOUSING CHOICE VOUCHER PROGRAMS

LHA has approximately 255 Public Housing Units located on five (5) housing complexes. LHA's Section 8 Department is responsible for: 1686 HCV, and of which 70 Mainstream Disable Vouchers, 75 VASH, 60 EMV, 25 Foster Youth, 197 Project Base Vouchers are currently being served. Individual being assisted through both the Public Housing and Section 8 HCV programs have been determined eligible to receive housing assistance based on income, family size,

disability or age qualifications and other criteria in accordance with LHA’s Admissions and Continued Occupancy Policy and HCV Administrative Plan.

Currently, the number of mandatory Section 8 slots has been reduced from ninety-90), although HUD allows the mandatory slots to be reduced each time an FSS successfully completes the program. LHA’s has opted to continue using the original number of slots (90). The LHA Board of Commissioners has authorized Fifty (50) Public Housing FSS slots (not a HUD mandate). The Public Housing slots can be increased based on available funding and as exhibited for need. The criteria established for participation in the FSS program will be the same for all participants. In accordance with HUD Guidelines and Regulations 24 CFR 984.101 all HCV Programs voucher holders will be offered the opportunity to enroll into the Family Self Sufficiency Program (FSS).

HOUSING CHOICE VOUCHER PROGRAMS		
LHA Clients Status	Expected Outcome	Clients Receiving Services
Housing Choice Vouchers		
• Mainstream	70	45
• VASH	75	77
• Emergency Housing Voucher	60	56
• Foster Youth	25	6
Project Base Vouchers	197	197
Section 8 Homeownership Vouchers Housing Choice	7	0
FSS PROGRAM CURRENT STATUS	Expected Outcome	Clients With FSS/Contract
Public Housing	50	46
Housing Choice Vouchers	20	104

The LHA will and recruit and market to all Housing Choice Vouchers holders, to include Mainstream, VASH, Emergency Housing Vouchers, Project Based, Section 8 Homeownership Voucher Program, and Public Housing with an estimate number of 250 families.

II. FAMILY SELF SUFFICIENCY PROGRAM

Family Self Sufficiency Program - OBJECTIVE

The objective of the program is to assist families in obtaining employment that will allow them to become self-sufficient, reducing dependency of low-income families on welfare assistance, voucher program assistance, public assistance or any federal, state, or local rental programs.

To meet our objective the LHA will network with existing community services, social service providers, colleges, financial institutions, transportation providers, vocational/technical schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS families the skills and experience to enable them to sustain gainful employment and education.

The FSS Program is an purpose and employment driven program with and savings incentive program for low-income families that have Housing Choice Section Vouchers, to include all special purpose vouchers, such as Public Housing residents. The FSS Program is intended to promote the development of local strategies for coordinating House Choice Vouchers with public and private resources to assist eligible families; the program is open to current families participating in the FSS Program - Housing Choice Voucher and Public Housing tenants who are unemployed or underemployed.

Family Self Sufficiency Program - GOALS

The primary goal of the FSS Program is for participating families to achieve social and economic independence by receiving necessary educational training and that all individuals in the household, who are able become gainfully employed. LHA will give emphasis on the determination of suitable employment, with the agreement of the affected participant, based on the skills, education, and job training and receipt of other benefits of household members, and based on the available job opportunities with their jurisdiction or community served by LHA 24 CFR 984.303. Each family should be free from any dependence on public assistance prior to completing their Contract of Participation. For those FSS participants that desire to become homeowners, community partners are available to assist families with homeownership opportunities.

Family Self Sufficiency Program - PURPOSE

The purpose of the FSS Program is to provide guidance on the personal, social, and economic development of the FSS participants. The FSS participants goals are the focal points and strategies will be implemented to achieve successful completion of the five-5-year program. With the development of local strategies into a program coordinating committee, this will

enable families to receive appropriate activities and supportive services with community partners. In that participants may obtain educational, employment, business, and social skills necessary to achieve self-sufficiency.

Family Self Sufficiency Program - Required Documents

Several documents, which are required by HUD to be maintained on file, identify the screening and program oversight procedures, which assist in creating an environment to actively communicate with each resident to assure every opportunity for the success of reaching goals of economic independence through a record maintenance system, as follows:

- The **Instructions for Executing the Contract of Participation** will set forth the instructions established by HUD Guidelines and Regulations as responsibilities and obligations are identified on the part of the resident and the LHA. **(See Exhibit A).**
- The **Contract of Participation** will set forth the provisions established by HUD and identifies the responsibilities and obligations on the part of the resident and the LHA. **(See Exhibit B - Revised Form HUD-52650).**
- The **Individual Training and Services Plan (ITSP)** includes interim and long-term goals, objectives and a time frame specifically designed for each resident and his/her family. In addition, the ITSP will list the resources and available supportive services for each family member, **(See Exhibit C)**. As changes occur, the ITSP can be modified, if requested by the family.
- The **LHA Family Self-Sufficiency Program FSS Escrow Account Credit Worksheet** (Exhibit D1) used to illustrate the **HUD Family Self-Sufficiency Program FSS Escrow Account Credit Worksheet** calculation process **(See Exhibit D (Revised HUD-52652))**.
- Other supporting documentation of certificate of completions, diplomas, verification of employment, school attendance, job trainings, etc.

Family Self Sufficiency -- FAMILY DEMOGRAPHICS

Initially, 150 families were subsidized under the FSS Program. The LHA Section 8 allocation for the Family Self Sufficiency Program did increase to a maximum program size of 104. Over the years the obligation has reduced/increased, due to participants who have successfully completed the program. As LHA Policy, recruitment efforts are open to all ethnic groups regardless of race, creed, or color. As with the Program type: LHA Public Housing and Section 8 are as follows:

County	White Only	Black/African American Only	American Indian or Alaska Native Only	Asian Only	Native Hawaii/Other Pacific Islander Only	White, American Indian/Alaska Native Only	White, Black/African American Only	White, Asian Only	Any Other Combination
FL11	25	75	0	0	0	0	1	0	0

Distribution by Head of Household's Ethnicity as a % of 50058 Received

County	Hispanic or Latino	Non - Hispanic or Latino
FL	27	73
FL11	18	82
		FL 39
		59
		0

All FSS families enrolled into the FSS Program will received supportive services as needed, in conjunction with their FSS Needs Assessment(s). The supportive services will be coordinated with community partners and FSS Staff, to include those individuals requiring reasonable accommodations as well.

250 Estimated Number of Eligible Families

Estimate Number: HCV Section 8 –100 Clients

Public Housing 50 Clients

VASH, EHV, PBR, FYI and Mainstream - 100

III. FAMILY SELF SUFFICIENCY PROGRAM COMPONENTS

Family Self Sufficiency Program -- ENROLLMENT

Families entering the FSS Program will work with a FSS Program Coordinator/ FSS Staff to develop goals (ITSPs), over a Five-5 Year period, leading to self-sufficiency. Upon meeting the goals and completes the FSS Contract of Participation the family becomes eligible to receive funds deposited in an escrow account on its behalf throughout the family’s participation on the FSS Program and eligible to graduate. The amount credited to the family’s escrow account is based on increases in the family earned income during the term of the FSS contract. After enrollment in the FSS Program, a formal needs assessment, to include educational, employment and supportive services will be conducted by the FSS Coordinator; and make referrals as needed to Program Coordinating Committee and/or other community partners. If previous FSS participants, graduates, as well as those who have exited the FSS Program will be allowed to re-enrolled, if extenuating circumstances caused the exit situation to occur.

LHA will expand eligibility for only Head Household for program enrollment to any adult member of household (Head of FSS Family), as designated by the family.

- One Contract of Participation per family
- Escrow goes to the person who signs the CoP, as referenced by HUD guidelines and regulations (CFR 984.303(a))
- Head of FSS Family means the designated adult family member of the FSS Program, who has signed the Contract of Participation. The head of the FSS Family may but is not required to be the head of household for purposes of determining income eligibility and rent, as referenced in HUD guidelines and regulations (CFR 984.103).

Family Self Sufficiency Program -- OUTREACH and RECRUITMENT

Outreach and Recruitment efforts (24 CFR 984.201) will target equally to the minority and non-minority families to ensure that non-English and limited English-speaking families receive information and can participate in the FSS Program. Additionally, efforts will also be made to serve persons with impaired hearing or vision. Outreach efforts will include distribution of FSS Program flyers to community partners (both public and private), mass mailing of program information to current and incoming FSS Section 8 Housing Choice Voucher Programs or Public Housing participants. Interpreters will be used as needed and clients may contact the FSS Coordinator/staff via telephone or by email. This will include (but not be limited to) distribution of printed materials during orientation, door to door delivery, newsletters, posting at manager's offices and other common reception areas, and Resident Advisory Board meeting. All possible sources for public notification and on-going recruitment will be used.

Outreach informational material will include:

- Program benefits
- Program Information
- Available resources
- Participant responsibilities

It is the policy of the LHA to comply with all Federal, State, and local nondiscrimination laws; the American Disabilities Act; and the HUD regulations governing Fair Housing and Equal Opportunity. No person shall be excluded from participation in, denied the benefits of, or otherwise be subjected under the FSS Program on the ground of race, color, sex, religion, national or origin, family status, source of income, or disability. In addition, FSS staff, upon request, provide reasonable accommodation to persons disabilities to ensure they are provided an opportunity for the services by the FSS Program, in accordance HUD guidelines and regulations.

The FSS Program has two other main components: Case Coordination and Escrow Accounts. Families receive Case Coordination and referral services to identify employment and supportive services programs available in the community to help achieve goals.

LHA Policy will include notifying or advising eligible families about the FSS Program, during Briefing/Orientations, Interims/Recertifications, Transfer/Portability, Lobby or Waiting List. The method of communication will be through flyers, invitational letters, posters, and/or referral forms.

Family Self Sufficiency Program - ESCROW ACCRUALS

Escrow deposits are calculated on increases in earned income as the impact the family's Total Tenant Payment (TTP) at the time of the Contract of Participation is executed. Escrow credit calculations will be whenever the LHA Section 8 Department/Public Housing staff conducts an interim or annual recertification. At least annually, the FSS Coordinator will provide the FSS families with an escrow statement reflecting beginning and ending balances, deposits, withdrawals, and interest accruals, in accordance with the HUD Guidelines and Regulations.

The LHA will establish a single depository escrow account for all FSS families, who have had an increase in earned income, since the effective date of the Contract of Participation (CoP) and are in compliance with all HUD guidelines and regulations. Earned income shall be income from wages, salaries, other employee compensation, and regular or special pay for a member in the armed forces, as well as earnings from self-employment. These funds will be deposited in an interest-bearing HUD approved investment. Investment interest shall be credited monthly and provided an annual statement to each participating family's FSS account.

The escrow credit for low-income families, whose incomes are between fifty-50 and eighty-80 percent of the Area Median Income (AMI) will be based on fifty-50 percent of the Median Income limit. Escrow credit worksheets will be calculated at each LHA Interim or Annual Recertification, where there has been an increase in earned income since the effective date of the Contract of Participation. A Section 8 FSS Family has successfully completed the FSS program, whenever thirty percent (30%) of the family monthly adjusted income equals or exceeds the Fair Market Rent (FMR) for the size of the unit and the area in which it is located. At such time the FSS family may receive escrow if no family member is receiving welfare assistance. A public housing FSS Family has successfully completed the FSS program, whenever thirty percent (30%) of the family's monthly income equals or exceeds the Fair Market Rent (FMR) for the unit the family qualifies for or occupies, and when no family member receives welfare assistance. (HUD defines ceiling rent as "the amount the HA will require for a particular unit size. The HA determines the ceiling rent, which is similar to FMR used in the Section 8 Certificate program"). Families can receive the escrow credit fund if they are independent of welfare assistance at the end of the contract. In addition, the LHA must receive proof of no welfare assistance. The FSS

Coordinator will verify information by telephone or written verification from the Department of Children and Families. The FSS program is graded yearly by the Section 8 Management Assets Program (SEMAP) indicator report from Public Housing Information System (PIC), and the percent of FSS enrollment and escrow account balance fund.

As a general rule LHA, at its sole option, can authorize interim partial release of the escrow funds, during the term of the Contract of Participation: when a minimum of one year of participation has passed, upon recommendation from the FSS Coordinator, when the family has fulfilled certain CoP Interim Goal(s), and needs a portion of the escrow ; and, it is determined that the family needs the funds to successfully complete the contract. Considerations for escrow account expenditures may include credit resolutions, down payment assistance for homeownership, tuition or related training expenses, small business start-up expenses, automobile purchase for work related activities, job training and/or equipment and supplies with supporting documentation. The amount of the request is limited to twenty percent (20%) per year of successful contract completion

Family Self Sufficiency Program -- CASE COORDINATION

LHA will be responsible for FSS Case Coordination through the FSS Coordinator, as outlined under HUD regulations (24 CFR 984.103), with the consideration that at enrollment, the most recent effective rent recertification must be used to establish the baseline, CFR 984.305(b). The FSS Coordinator will help participants to receive the services and support as needed to achieve their goals by contacting organizations that work with participants in the completion of forms, applications, resumes and finally make referrals for supportive counseling such as: career development, credit counseling, schools and when requested, for family services, mental health and/or family counseling in accordance with the HUD guidelines and regulations.

Family Self Sufficiency Program -- SHORT and LONG-TERM GOALS

Initially, an Individual Training and Services Plan (ITSP) will be developed and discussed with each participant at enrollment, which will entail establishing the goals and Five-5 Year FSS Timeline, (See Exhibit E. The additional pages provide a format for recording each interim goal and specific information related to its achievement. The participant and FSS Coordinator or another authorized LHA staff must sign the final page of each participant's plan.

Interim goals must be specified, along with the activities and services needed to accomplish the goals. *For example, a single mother with two children who has an Interim Goal of completing her secondary, might require several different activities and services to achieve that goal. These could include transportation, tutoring, and/or childcare. One of the Interim Goals for families receiving welfare assistance is to become independent of welfare by the end of the contract. Any*

Family that is receiving welfare assistance must have this included as an Interim Goal in the Head of the Family's ITSP.

The final goal listed as indicated on the ITSP of the Head of the Family must include getting and maintaining suitable employment specific to that individual's skills, education, job training, and the available job opportunities in the area.

FSS FAMILY – ANNUAL GOAL TRACKING - TIMETABLE

Years 1-2

- Conduct FSS Needs Assessment
- Develop and establish ITSP Goals
- Review needs for vocational or educational training
- Review needs job training, career development or employment for advancement
- Assess employment status in a realistic field to progress or advance
- Check gainfully employment status; and if needed, career development to advance
- If unemployed, discuss employment strategies and career development to gain employment
- Monitor employment search(es) and follow through with all referrals for employment
- Prepare for credit counseling, financial education

Years 2-3

- Monitor employment with potential for career advancement
- Review vocational or educational training for career development
- Check status of education or vocational training points of completion
- Check employment status during this period
- Review ITSP with FSS Participant and discuss changes as needed to accomplish goals
- Check credit counseling for homebuyer's education, money management, financial and budget planning

Years 3-4

- Check gainfully employed status towards self-sufficiency
- Check job training and completion status
- If indicated, preparation for homeownership counseling
- Must be independent of Federal or State welfare assistance at end of CoP
- Must have completed an Individual Training and Services Plan
- Prepare to graduate, grant extension

Year-5

- Check gainfully employment for FSS Program completion
- Check job training completion status
- If indicated, check status credit counseling and homeownership preparation
- Check status being independently free of Federal or State welfare assistance at end of CoP
- Check status of Individual Training and Services Plan – Goals, as indicated
- Prepare to graduate or review for a grant extension

IV. FSS – CONTRACT OF PARTICIPATION (CoP) and INDIVIDUAL TRAINING and SERVICES PLAN (ITSP)

The **Contract of Participation (CoP)** will define the rights and responsibilities of both the client and LHA under the FSS Program, as outlined in the HUD Guidelines and Regulations. The head of the FSS Family must be the head of household for eligibility and rent determination purposes. The CoP also requires that the family comply with its lease requirements.

Changes to the Contract

- This contract of participation can only be changed to modify the contract term, the Head of the Family, or the Individual Training and Services Plans.
- Any change of the Head of the Family under the contract must be included as an attachment to the contract. The attachment must contain the name of the new designated Head of the Family, the signatures of the new Head of the Family, an LHA representative, and the date signed.
- Any change(s) to an Individual Training and Services Plan must be included as a revision to the Individual Training and Services Plan (attachment) to which the change applies. The revision must include the item changed, signatures of the participant and an LHA representative, and the date signed.
- For extensions to the contract term, see the "Term of Contract" section.
- If, twelve months after the effective date of the contract, a Family in the Section 8 FSS program moves outside of the LHA jurisdiction, under Section 8 portability procedures, the LHA may take one of the following actions.
 - The LHA may permit the Family to continue to participate in its FSS program, if the Family demonstrates to the LHA's satisfaction that it can meet the Family responsibilities of the

contract in the new location. In this case, the existing contract remains in effect with no change. The LHA must transfer the Family's FSS escrow account balance when the receiving Housing Authority absorbs the Family.

- The receiving Housing Authority may permit the Family to participate in its FSS program. If so, the LHA must terminate its contract with the Family. The LHA must also transfer the Family's FSS escrow account balance when the receiving Housing Authority absorbs the Family. The receiving Housing Authority will execute a new contract with the Family.
- In cases where the Family cannot fulfill its Family obligations in the new location, and the receiving Housing Authority does not permit the Family to participate in its FSS program, the contract between the LHA and the Family shall terminate and the Family will lose the funds in its FSS escrow account.

Individual Training and Services Plans

The **Individual Training Service Plan (ITSP)** will be attached to every contract. The program services will be offered and provided to each participating family member as listed. The CoP will be executed no more than 120 days after the household's most recent annual or interim recertification. A new recertification will be completed if more than 120 days have elapsed. The initial term of the CoP is Five-5 Years. The LHA may grant an extension of up to two-2 years, if the family gives a written request for an extension and if the LHA finds that good cause exists for an extension. The FSS family has the right to modify their ITSPs, as suited for their goals; and can graduate before the five-year period of the CoP as long as their goals have been obtained.

- The contract must include an Individual Training and Services Plan (ITSP) for the Head of the Family. Other Family members aged eighteen and older may choose to execute an Individual Training and Services Plan, if agreed to by the LHA.
- The resources and supportive services to be provided to each Family member must be listed in the Individual Training and Services Plans that become attachments to the contract of participation.
- Page one of each participant's Individual Training and Services Plan includes space for the final goal and an area to list the interim goals needed to achieve the final goal. The additional pages provide a format for recording each interim goal and specific information related to its achievement. The participant and LHA representative must sign the final page of each participant's plan.
- Interim goals must be specified along with the activities and services needed to achieve them. For example, a single mother with two children who has an interim goal of completing

her secondary education might require several different activities and services to achieve that goal. These could include transportation, tutoring, and/or childcare.

- All completion dates included in the Individual Training and Services Plan must be on or before the contract of participation expires.
- One of the interim goals for families receiving welfare assistance is to become independent of welfare assistance for at least twelve (12) consecutive months before the end of the contract. Any Family that is receiving welfare assistance must have this included as an interim goal in the Head of the Family's Individual Training and Services Plan.
- The final goal listed on the Individual Training and Services Plan of the Head of the Family must include getting and maintaining suitable employment specific to that individual's skills, education, job training, and the available job opportunities in the area.
- The FSS Coordinator must determine if unavailable services are an integral part of the Family's progress or advancement towards self-sufficiency. If services are not integral to the Family's progress, the FSS Coordinator shall review the Individual Training and Services Plan to delete services and modify the contract to remove any obligations on the Family to accept unavailable services. If unavailable services are an integral component of success, the FSS Coordinator shall declare the contract null and void and reclassify the FSS Family as a non-FSS Family.

Family Self Sufficiency Program – CONTRACT EXTENSION

Extensions will not be granted for loss of employment, due to lack of performance on the part of the FSS participant. All requests for extensions must be submitted in writing prior to expiration of the Contract of Participation. The request letter should include the following components:

- An explanation of why the goals were not completed,
- What goals still need to be completed; and
- The time frame in which the goals will completed.

Participants will be notified in writing of LHA's decision within fourteen-14 business days and may request an informal hearing, if they disagree with the decision (see Hearing Procedures below). During the extension period, the family will continue to be eligible to receive deposits into the FSS Escrow Account. The FSS Head of Household will be required to continue abiding by the CoP and ITSP, as well as keep in regular contact with a FSS Coordinator during the extension period.

The contract is complete, and a family's FSS participation is concluded, when:

- The family has fulfilled all its obligations under the contract on or before expiration of the contract; or
- 30 percent of the monthly adjusted income equals or exceeds the published Fair Market Rents for the family size under the LHA subsidy standards (even if the five-5 years is not up and no family receives state welfare).

The participant will be considered to have completed all its obligations when the family has completed the contract on or before the contract expiration date or extension; as defined HUD regulations (CFR 984.305(c)).

Also, the LHA will expand eligibility for only Head Household for program enrollment to any adult member of household (Head of FSS Family), as designated by the family.

- One Contract of Participation per family
- Escrow goes to the person who signs the CoP, as referenced by HUD guidelines and regulations (CFR 984.303(a))
- Head of FSS Family means the designated adult family member of the FSS Program, who has signed the Contract of Participation. The head of the FSS Family may, but is not required to be the head of household for purposes of determining income eligibility and rent, as referenced in HUD guidelines and regulations (CFR 984.103).

INTERIM DISBURSEMENT of FSS FUNDS

The LHA will allow the family to receive a portion of its escrow funds early under circumstances specified below. Participants in good standing with the LHA Section 8 FSS Program will be allowed to request money from their accounts prior to the completion of the Contract. The early withdrawal of funds must be used for continuing growth and reaching the goals articulated in the ITSP. Withdrawals can only be made once during a twelve (12) month period. All FSS families with an escrow balance are eligible to request a withdrawal.

The FSS Coordinators will determine that the family has fulfilled the established interim goals and requires a portion of the FSS escrow account funds for the purpose consistent with the Contract of Participation. Before agreeing to an early disbursement, the FSS Coordinator will seek other sources for the funds will not be depleted. The FSS staff will discuss the appropriateness of the request during a regularly scheduled meeting. The FSS Program reserves the right to request that the family attend a meeting for clarification of the withdrawal request before a determination is made and/or may require additional documentation prior to making a decision.

The decision to release escrow will be made by consensus of the LHA administrators and the decision will be binding. If the withdrawal request is denied, the FSS family will be given written response outlining the decision. Should the family not complete its FSS contract, the family is not required to repay the amount received as an interim disbursement unless the advance payment was made based on fraudulent information given by the family. Early disbursement of escrow funds may include and may not be limited to the following:

- Completion of college or graduate school (expenses related to education)
- Job training
- Transportation expenses
- Purchasing a home
- Addressing credit resolutions
- Other associated cost for needs

DISBURSEMENT PROCEDURE for WITHDRAWAL

The head of household provide a written request for an interim. The request must include:

- The amount of money requested,
- The reason/need for the money,
- How the funds will be used,
- How will the usage of funds facilitate movement towards self-sufficiency,
- An assessment of their progress on their ITSP goals,
- Alternate funding sources they have tried, and
- Documentation of expenses

All requests for early disbursements of SS funds must be made in writing 30 days prior to state use; no checks will be issued to FSS participant. Checked will be issued to the appropriate entity.

FINAL DISBURSEMENT – CONTRACT COMPLETION

In order, to successfully complete the FSS Contract of Participation and receive any money in the FSS Escrow Account, participants must meet the following criteria:

1. The head of household has obtained a suitable full-time job (as defined above) or has maintained part-time employment for a period of six-6 months.
2. All members of the household have been independent of welfare for at least twelve-12 consecutive months. Welfare is defined as income assistance from Federal or State Welfare Programs and includes only cash maintenance payments designed to meet a

family's ongoing basic needs. It does not include Food Stamps, Social Security, Child Support payments, Medicaid, or similar benefits.

3. All activities listed on the ITSP must be completed within all designated timeframes.
4. The household is in full compliance with the lease, including no monies owed for repayment agreements to LHA or the Section Landlord. Escrow payment is the amount in the family's (participant) account, less any money owed to the LHA Program. Before disbursement of the escrow account funds the FSS Coordinator will verify that the family does not owe a debt.
5. Alternatively, a family may graduate from FSS when 30 percent of the family's monthly adjusted income equals or exceeds the published Fair Market Rent for the family unit size under the LHA subsidy standards (even if the five years is not up), the head of household is employed, and no family member receives State welfare. The participant will be considered to have completed all of its obligation when the family has completed the contract or before the contract date or extension; as defined Family Self Sufficiency regulations 24 CFR 984.305(c).

Full-time employment is defined as:

- For hourly or salaried employees – at least 32 hours per week
- For self-employment – net earnings (after business expense deductions) of at 32 hours per week at minimum wage.

Accommodations for disabled individuals – A person with disabilities may request an accommodation to these employment standards. Request for accommodation must be submitted in writing and supported by written statement from the individuals' medical provider at least 90 days prior to program completion. The statement will include a recommendation from the medical provider as to a specific number of hours that the individual is able to work due to disability. Requests will be considered on a case-by-case bases.

Suitable Employment:

Employment standards as outlined by HUD Regulations (CFR 984.303), as follows

- Employment with an established, legitimate business (the participant is receiving a regular paycheck from which taxes and other required deductions are withheld).
- Self-employment which is verifiable through Federal Income Tax Returns (With Schedule C).

- Contracted commission employment will be considered if it meets the hourly /income requirements, is verifiable, and being declared for tax purposes.
- Informal employment which does not meet the criteria listed above will not be considered (employment where income is not declared for tax purposes).
- Employment must be considered a lawful activity.

FORFEITURE of FSS FUNDS

As in accordance with HUD Guidelines and Regulations, the LHA will establish a process for forfeited funds from the FSS Escrow Accounts to be used for supportive services.

Escrow funds will be forfeited if:

- The Contract of Participation, including and extension, expires and the obligations are unfulfilled by the head of household.
- The FSS family loses their housing assistance due to a violation of the Section HCV family obligations;
- The FSS family is deemed to be non-compliance with the FSS Program and is terminated;
- The FSS family voluntarily terminates their enrollment in the FSS Program.
- LHA will implement a policy change to use forfeited funds for supportive services that assist with job training, educational assistance, materials, supplies, uniforms, transportation (bus passes) and other associated services needs

V. FAMILY SELECTION PROCEDURES

LHA Policy -- Selection of Participants

The FSS staff has the primary responsibility to uphold the LHA Policy regarding the selection procedures that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS Coordinator/Department Manager will review the file to ensure that non-selection is not based on discriminatory factors before the final decision is made. Applicants will be notified in writing of the reason(s) they were not selected for participation and will have an opportunity to appeal the decision (see Hearing Procedures). At all times, the LHA will select families for participation in the FSS Program in accordance with HUD guidelines. LHA will establish policies and procedures to ensure selection without regard to race, color, religion, sex, handicap, familial status, or national origin.

LHA clients who express an interest in the FSS Program may be screened before being enrolled in the program within the following HUD allowable guidelines: mandatory participation in a FSS

program orientation on either group or individual bases. The FSS orientation will include a review of participants expectations, the services offered, and the requirements to complete the FSS Program. Those interested clients who have successfully completed the program orientation and express further interest in enrollment will be chosen for participation based on the following factors:

- Preference given to FSS participants porting to LHA from another Authority FSS Program
- Preference given to related service programs as described above

Participation remains on a voluntary basis; program application forms are outlined in the attached copy of the FSS documents. Acceptance into the program will be based on availability of space and the reality of a resident achieving the determined goals established with the FSS participants and the FSS Coordinator. Priority for participation will be determined on a first come first served basis. Each individual must be in good standing with the Lakeland Housing Authority and, if applicable the Section 8 Landlord. In addition, individuals who are in academic or vocational training, unemployed and/or underemployed will be given priorities for vacant slots.

To be determined active, each participant will be expected to attend resident and FSS Meetings, participate in quarterly meeting to discuss ITSPs goals identifying education progress or employment training outcomes and that may have a contribution to an escrow account, if employed. The head of household will have an ITSP on file and other adults in the household participating in the FSS program. Participants will act whenever possible as mentors for other residents.

The FSS Coordinator/ FSS Staff will give an orientation to each participant and will assist in developing a full ITSP including family barriers to employment. Youth in need of academic remediation, school dropouts, pregnant or parenting teens or any other status which may be causing the resident to have employment barriers will be addressed. The family will be assisted in overcoming those barriers.

LHA at its discretion, may deny participation in the program to a family that previously participated and was terminated from the FSS Program, because the family did not meet their obligations according to the Contract of Participation. Also, LHA, may allow a family that was previously terminated to sign a new contract, if cause for termination was due to circumstances beyond their control, such as a serious illness.

FAMILY SELF SUFFICIENCY -- WAIT LIST

As per HUD guidelines, the LHA FSS Program will maintain a FSS Waiting for the families, in accordance with guidelines as established with the selection process for the FSS Program.

Prospective individuals must be active recipients of the Housing Choice Voucher Programs (HCV) or Public Housing. LHA will utilize a first-come - first-served selection system for the FSS Waiting List using date stamp on letters of interest received from all tenants.

- Date and time stamp
- Preference will be given to tenants porting in from other FSS HCV Programs

In the event that there are no vacant slots for HCV Programs participants, the **FSS Waiting List** will be utilized. By quarterly review, inactive participants will be removed from the FSS Roster and those residents on the FSS Waiting List will be approached about participating in the program at the new date. If there are no vacant slots for Public Housing residents and there are no inactive participants during a review process, additional slots will be requested from the Board in increments of (ten) 10 slots at a time. The Board will determine the reasonableness of the request. The decision about the extra slots will be determined based on funding availability and demand.

Family Self Sufficiency Program -- ORIENTATION SESSIONS

The LHA through the FSS Coordinator/ FSS Staff will hold orientation sessions for all FSS participants and/or other interested family members. Individual and confidential appointment(s) will be scheduled with each participant to discuss and establish their Five-5 Year Plan. Interpreters will be used, as needed and clients may contact the FSS Coordinator/staff via telephone or by email.

The following topics will be discussed:

- Right and responsibilities of both participants and LHA
- Contract of Participation
- Understanding of Participation
- Individual Training Service Plan
- Future individual and confidential meeting to discuss goals

VI. FAMILY SELF SUFFICIENCY -- ACTIVITIES and SUPPORTIVE SERVICES

Assessment of Family Needs

An assessment will be conducted to help program participants establish the goals/needs identification process. The FSS Coordinator/ FSS staff will work with each person in the family, who wishes to develop an Individual Training and Service Plan (ITSP). The assessment addresses common issues faced by participants of self-sufficiency programs including, but not limited to: employment, job search and readiness, abuse issues, budget issues, child care issues, clothing

needs, drug and alcohol abuse issues, educational issues, health/mental health issues, medical coverage issues, parenting skills, support network needs, and transportation issues.

The purpose of the assessment tool is help clients to start thinking about issues of real concern in their lives and the areas of their lives in which they can realistically hope to achieve some improvement. In conjunction with the ITSP, identified goals are then broken down into realistic action steps. Goal progress is tracked with each participant through quarterly contact by letters, phone, or email as well as through quarterly interviews. Goals can be revised during this period but must be approved by the FSS Coordinator. **Goals may not be changed within the last 12 months of the Contract of Participation.** The head of the household is the only person required to have an ITSP, although other adult family members are encouraged to work with the case manager to develop their own.

Comprehensive resources are available to FSS program participants through public and private agencies. In order to protect confidentiality, participants sign a Release of Information that allows FSS staff to coordinate with these agencies for the provision of services. The following is a list of services currently available to eligible FSS participants. LHA will continue to include resource from many places throughout the community, which means that resources and services are in a constant state of change.

METHODS FOR IDENTIFICATION OF FAMILY SUPPORTIVE SERVICE NEEDS

Supportive services needs will be identified by completion of informal needs assessment with FSS Coordinator or Case Manager before completion of the initial Individual Training and Service Plan (ITSP) and signing of the Contract of Participation for all eligible family members. As required by HUD (24 CFR 984.201), the activities, and supportive services as determined by the Lakeland Housing Authority will be coordinated in conjunction with Program Coordinated Committee and community providers to FSS as follows:

FSS ACTIVITIES and SERVICES		
PROGRAM SERVICES	SUPPORTIVE SERVICES	COMMUNITY PROVIDERS
Assessment	Educational Vocational Employability Skills Disability Substance Abuse Mental Health	Adult Basic Education CareerSource Community College Community-based Organizations Health Services
Individual Training and Service Plan (ITSP)	Five -5 Year Plan with goals Establishing: personal, career development, professional development, sustainable	FSS Coordinator and Case Managers

	employment, and financial management	
Education	High School English as a Second Language GED Post-secondary College	High School Adult Education, Community College and Universities, Technical Schools
Training	On-the-Job Skill Trainings Trending Technologies Medical Trainings	CareerSource Community College/University, Community-based Organizations
Transportation	Bus, vehicles and development of personal transportation	Transit Authority, auto financing
Childcare	Infant Care Toddler Care Pre-School Care Afterschool Care Homework Assistance	Childcare Resources Park and Recreation Boys and Girls Club
Job Search Assistance	Resume Preparation Interviewing Skills Dress for Success Employability Skills Workplace Essentials Job Development Job Placement Assistance	CareerSource Community College Vocational Schools Community-based organizations
Health Care	Mental Health Substance Abuse Prevention Crisis Resolution Domestic Violence Senior Care Health Insurance	Obama Care Health Department Community Clinic Individual/ Family Counseling Hospital Care Crisis Team/Management Medicaid/Medicare
Small Business Development	Business Plan Development Mentoring Business Plans Understanding Finances Business Requirements	Vocational Schools Community College FSS-Program Coordinating Committee
Homeownership	Credit Counseling Financial Education Money Management Credit Resolution Debt Management Budgeting and Planning Homebuyer Education Household Management	Community Partners Community-based Organizations Financial Institution Consumer Credit Counseling Financial Bureau Consumer Protection HUD Certified Counselors
Household Management	Self-Care Adult Life Skills	FSS Coordinator/FSS Staff

	Youth Life Skills Personal Development Household Maintenance	Community-based Organizations
Legal Services	Counsel or Advice	Legal Aid

The services needs will vary with each family and the LHA program structure is designed to coordinate program services that may be needed with community -based organizations, as needed for the family.

- Childcare
- Transportation
- Education
- Employment
- Personal Development
- Household Management
- Homeownership
- Financial Empowerment
- Other Services

Incentives to Encourage Participation

The FSS Program offers incentives such as the FSS escrow account, case management and other supportive services that not only encourage participation, but help families achieve self-sufficiency. In addition to encouraging program participants through such incentives, LHA will also conduct outreach to recruit FSS participants from among eligible families.

As with the FSS Program, LHA will offer incentives to encourage participation and enhance the participant’s ability to achieve self-sufficiency. LHA will establish an FSS Escrow Account for each eligible participating family in accordance with HUD Guidelines and Regulations, as a financial incentive for program participation. Additional incentives include, but not limited to enhanced opportunities for education, training, and employment. FSS participants will have access to case management services, financial counseling, credit repair, homeownership workshops and available resources about the home buying process. FSS participants also will have several personal incentives for involvement including structural goal planning, greater opportunity to increase their standard of living, an enhanced support system, increased self-esteem, and etc. Most importantly, the FSS participants will have the right to revise their plan(s) when and if for the betterment of goals.

ADDITIONAL SERVICES – Personal Development

In addition to employment and training programs, FSS participants will be expected to participate in personal growth and development workshops, to include but not be limited to: Self-Care, Personal Development, Life Insurance, Health Care Awareness, Parenting and Family Planning, Household Management, Mental Health (Depression/Anxiety), Decision Making and Life Outcomes, Healthy Relationship, Employability Training, Importance of Drive License/Suspension, Impacts of Criminal Backgrounds, Employment Retention, Workplace Essentials, Asset Building, Budget and Planning, Credit Counseling, Homeownership Opportunities, Conflict Resolution, Citizenship, Voting Responsibilities, and Home Maintenance.

On-Going Service Coordination

Several agencies receive funding from a variety of funding streams to operate programs on public housing properties. Because of the demands placed on working parents by family members, FSS participants are encouraged to enroll dependents in after-school programs for reading and mathematics literacy, character development, homework assistance, study skills, recreation, health, and social issues.

Career Development and Personal Counseling

It is a goal of the FSS program to have each resident achieve social and economic independence by receiving necessary training and that all individuals in the household who are able become gainfully employed. To make the most effective use of funds and time available, each FSS participant will be directed to a compatible career path whenever possible. Through a process of combining local resources with the identified desires of the resident, the FSS Staff will subjectively determine the assessment to be done on each eligible resident. Objective measurements will be conducted when determined necessary to identify academic and vocational skill levels, aptitude and ability for each person entering the workplace.

Job Development, Training and Placement

The Lakeland Housing Authority is represented on the Polk Workforce Development Board by the membership of a Commissioner of the Authority. As part of this effort, LHA is committed to provide job placement and training for all residents including FSS participants. The FSS Coordinators and Resident Services Associates work to access local services to assist all eligible residents in overcoming personal and family barriers to employment.

These barriers may include, but are not limited to the following:

Low Academic Levels:

- In need of GED or HS Equivalency, School Dropout, Reading and Math below 8th grade level.

Non-English Speaking:

- Incapable of reading or performing work related tasks in English

Low Vocational Skills:

- No marketable ability or work history

Physical or Mental Barriers:

- Receiving disability benefits or in the process of being determined eligible for benefits
- Need for supportive services such as transportation, childcare, clothing, etc.

Job Placement Assistance

FSS Staff are referring by non-financial agreement with the Florida Department of Labor to assist FSS participants through the Lakeland Housing Authority in finding meaningful employment. Access to the job bank information available at the CareerSource Polk has been arranged at the Washington Park Housing Complex in the Emma Mae Smith Turner Community Center – Computer Lab.

Transportation

Public transportation and LHA transportation will be provided for FSS participants for training and other FSS related activities sponsor by LHA.

Unavailability of Supportive Services

In accordance with HUD Guidelines, if situations occur, when a FSS participants may not be able to meet work related goals, because of the unavailability of supportive services. If the FSS Coordinator determines with the FSS participant that the need for supportive services is temporary, an extension to the time for completion of the FSS program may be requested. If it is the recommendation of the FSS Coordinator that the client will not be able to complete the FSS Contract, and ITSP goals will be amended as needed to make necessary adjustments for points of completion towards self-sufficiency.

VII. FAMILY SELF SUFFICIENCY -- PORTABILITY

Families selected to participate in the FSS Program must initially live in an assisted unit within the jurisdiction for twelve (12) consecutive months in order to exercise a move under portability provisions. The FSS family must make a commitment to remain in a residence LHA for a minimum period of one (1) year from the date the FSS Contract is signed. If the family chooses to move to a new area after that time, a separate escrow account for the family will be established. All performance expectations are identified in the Contract of Participation. If a family exercises portability after initial occupancy and are at any time during the term of the Contract of Participation unable to fulfill their FSS obligations (either by continuing in the initial program or transferring to the Receiving Public Housing Authority's program), FSS participation and Section 8 assistance may be terminated. If the FSS Contract of Participation is terminated prior to successful completion by the family of all goals, any accrued escrow amount would be forfeited, per the contract's requirements. The family would be offered the opportunity for an informal hearing in the event of either FSS participation or Section 8 termination.

If a Family moves under Section 8 portability procedures and is going to participate in the receiving Housing Authority's FSS program, the effective date of the contract between the Family and the receiving Housing Authority is the first day of the month following the date the contract was signed by the Family and the Housing Authority's Representative. The expiration date of the contract between the receiving Housing Authority and the Family must be the same as the expiration date of the contract between the LHA and the Family, in conjunction with HUD Guidelines and Regulations in term of LHA Recertification and Interim Changes.

VIII. FSS PROGRAM TERMINATION – LHA POLICY

Involuntary Termination:

FSS Participants may be denied or involuntarily terminated from the FSS under the following circumstances:

1. If the FSS participant fails to meet their obligations under the Contract of Participation, the Individual Training and Service Plan and related documentation.

Non-compliance includes:

- Missing scheduled meeting, failure to return phone calls and maintain contact after written notification of non-compliance
- Failure to complete quarterly reviews
- Failure to work on activities and/or goals within the specified time frames

- Failure to participate job related activities (ex. Employment, education, training, workshops, etc.)
- If FSS participants owes money to Section 8 Program
- If the FSS participant has committed fraud in connection with Federal housing assistance program
- If the FSS participant has breached an agreement to pay back amounts owed to the Housing Authority
- If the FSS participants failed to meet any obligation under the lease
- Expiration of the Contract of Participation or any extension of the Contract without completing the criteria for program completion as outlined under the HUD Guidelines and regulation
- If the FSS participant's housing assistance is terminated with cause

FSS Participants who fail to meet obligations under the above circumstances will be given the opportunity to attend a required meeting with the FSS Coordinator or FSS Staff to resolve the issue. During this meeting, a review of the Contract of Participation, Individual Training and service Plan, all related documentation will conduct, and amendments will be made as necessary, in accordance with HUD Guidelines and Regulation that allows for changes in circumstances. Failure to contact the FSS Coordinator to schedule this meeting within fourteen-14 days of a written request for a meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue, may lead to termination from the program. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program. Notification to the family will be made by written notice, stating:

- The specific facts and reasons for termination
- A statement informing the family of their right to request an informal hearing and the date by which this request must be received (See Hearing Procedures)
- A statement informing the family that termination from the FSS Program for the reasons stated will not result in termination of the family housing assistance. Failure to request a hearing in writing by the deadline will result in closing of the family's FSS file and all rights to a hearing will be waived.

Voluntary Termination:

- Mutual consent of both parties; and/or
- The family's withdrawal from the program

If the family withdraws from the FSS Program with the mutual consent of LHA and FSS Head of Household, then the family may rejoin the FSS Program in the future, with the following changes:

- The family signs a new Contract of Participation and Individual Training and Service Plan
- The family is not eligible to receive accrued funds in escrow from their initial withdrawal from FSS
- The family will be eligible to receive future deposits into escrow after rejoining

Hearing Procedures:

All requests for informal hearings must be received by LHA FSS Coordinator fourteen-14 days of the date of termination letter. If a hearing is requested by the FSS Family, notification to the family regarding the date, time, and location of the informal; hearing will be by mail.

Person to be included in the informal hearing shall include, but not limited to:

- FSS Head of Household
- FSS Coordinator; and
- LHA Administrator, other FSS program staff, serving as a Hearing Officer, all participants have the right to obtain legal representation and their witnesses.

The family may request to reschedule for a good cause, or if needed as a reasonable accommodation for a person with disabilities. Good cause is considered, as an unavoidable conflict which seriously affect the health, safety or welfare of the family.

Reasonable Accommodations:

LHA and FSS Program Coordinator/ FSS Staff will make reasonable accommodations to persons with disabilities to ensure that they are able to take full advantage of the services provided under the FSS Program.

IX. ASSURANCE OF NON-INTERFERENCE WITH RIGHTS OF NONPARTICIPATING FAMILIES

In accordance with (24 CFR 984.201(d)(10), a family housing assistance or admission into assisted housing would never depend on whether it is their choice to participate in the FSS Program. the Lakeland Housing Authority (LHA) will make this known as part of the recruitment process. To be clear, at recruitment with assurance the LHA will clearly explain that a family's decision to not participate I the FSS Program will not affect the family's admission to the public

housing or house choice voucher program, nor will it affect the family's right to occupancy in accordance with the lease.

LHA Policy

LHA will advise that participation is strictly voluntary. Public housing residents and housing choice voucher program participants will be notified in all literature and media presentations related to the FSS Program that should they decide not to participate in the FSS Program it will not affect their public housing or HCV housing assistance. This material will also specify that the family will retain the right to occupancy according to their lease and family obligations contract.

X. FAMILY SELF SUFFICIENCY -- PROGRAM COORDINATING COMMITTEE

FSS – Program Coordinating Committee (PCC)

An advisory group composed of local professionals and residents will oversee the activities and resident involvement in the FSS Program. The composition of the advisory group will be representative of resources for the residents in the areas of employment and education barriers, social needs and other potential growth and development phases of economic self-sufficiency. Representatives may include (but will not be limited to) educators, bankers with knowledge of personal credit areas and mortgage loans, community action agency staff, transportation disadvantaged, law enforcement staff, housing authority staff, residents, health care providers, ministers, job training and vocational rehabilitation, childcare providers, vocational rehabilitation and/or private employers.

The committee will assist in assessing potential participants, reviewing individual progress reports, determining successful completion status, and advising staff on potential supportive services and job placements. They will also be asked to make recommendations about potential changes that could enhance the FSS program and its relationship to other LHA programs.

FSS Staffing

The Family Self-Sufficiency Coordinators will oversee the activities of the FSS programs for both PH and HCV Programs. The individuals conducting orientation and re-certification workshops for both Public Housing and Section 8 Housing Choice Voucher Programs will work to recruit new participants and make time available for the appropriate staff person (or participant) to make a presentation about the FSS program.

Community Agencies

As welfare reform has become more of a reality in Florida, the collaborative efforts by several agencies for the success of a family are ongoing. The LHA will include in community outreach efforts to advise public service persons from city, county and local community-based organizations, such as: Department of Children and Families Services, United Way, Jobs and Benefits, VASH, FYI, Polk Work One Stop Center, Vocational Training, Vocational Rehabilitation, WAGES, Head Start, primary, secondary, and post-secondary education or training institutions, financial empowerment organizations, US Armed Forces, to include the Lakeland Housing Authority Resident Advisory Board (RAB), and other programs about the FSS opportunities that are readily available. FSS is a viable component to enhance participation in any of the above-mentioned programs. The Lakeland Housing Authority is represented on the Polk County Workforce Development Board and will continue to be an active participant in Welfare Reform Programs in the area.

Exit Interviews

Exit interviews will be conducted through a survey or personal contact with each out-going participant who successfully completes the program for the purpose of increasing the capabilities of the program. All FSS "Alumni" will be encouraged to volunteer for resident committees and other functions in which they will have invaluable contributions to the success of on-going programs. Miscellaneous recruitment information will be reviewed by the Alumni to help with communication with resident.

XI. CERTIFICATION OF COORDINATION

As required by 24 CFR 984.201, Housing Authority of Lakeland Florida (LHA) certifies that development of the services and activities under this FSS Program has been coordinated with the following programs specified in the regulation: Department of Children and Families Services, United Way, Jobs and Benefits, VASH, FYI, Polk Work One Stop Center, Vocational Training, Vocational Rehabilitation, WAGES, Homeless Coalition of Polk County, Head Start, primary, secondary, and post-secondary education programs or training institutions, financial empowerment organizations, to include the Lakeland Housing Authority Resident Advisory Board (RAB)/ Section 8 HCV Representative, and other programs that support FSS opportunities. And service coordination with community providers will be implemented and continued to be coordinated, in order to avoid duplication of services and activities.

REFERENCES

1. HUD Federal Resources Page
2. Public and Indian Housing – HUD Guidelines
3. J. D’Amelia and Associates, Sample FSS Program Action Plan 2022
4. Code of Federal Regulations (CFR 984
5. Administering an Effective Family Self Sufficiency - FSS Guidebook
6. HUD – Family Self Sufficiency Final Rule May 2022
7. Lakeland Housing Authority Housing Choice Voucher - Administration Plan
8. Housing Choice Voucher Guidebook
9. FSS@pih@hud.gov

EXHIBIT A

Housing Authority Instructions for Executing the FSS Contract of Participation

Each Housing Agency (HA) must enter into a contract of participation with each eligible family that opts to participate in the FSS program. Each HA must consult with local officials to develop an action plan containing descriptions of the size, characteristics, and needs of the population to be served by its proposed FSS program; the services and activities it will provide; how the program will be implemented; the public and private resources through which services and activities will be provided; a timetable for implementation; and other data necessary for HUD to ensure coordinated implementation of program services and activities.

Public reporting burden for this collection of information is estimated to average 1.0 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.

Response to this collection of information is mandatory by law (Section 23 (c) & (g) of the U.S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act (PL 101-625) for participation in the FSS program.

“Privacy Act Statement. This statement is provided pursuant to the Privacy Act of 1974, 5 USC § 552a. The authority for collecting personally identifiable information (PII) in the Regulatory Consistency Communication Board (RCCB) Electronic Feedback Form is based in Section 313 of Public Law 112-95,” to be included on all forms, prior to being submitted for OMB approval.”

The information collected on this form is considered sensitive and is protected by the Privacy Act. The Privacy Act requires that these records be maintained with appropriate administrative, technical, and physical safeguards to ensure their security and confidentiality. In addition, these records should be protected against any anticipated threats to their security or integrity which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom the information is maintained.

HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

HA Instructions for Executing the FSS Contract of Participation

Parties to the Contract/Signatures

The head of the participating family must be the adult member of the family who is the head of the household for income eligibility and rent purposes.

Term of Contract

The effective date is the first day of the month following the date the contract was signed by the family and the HA's representative.

The expiration date is five years from the effective date of the contract.

If the HA decides to extend the term of the contract, the original expiration date listed on page one of the contract must be crossed out and the new expiration date added.

If a family moves under HCV portability procedures and is going to participate in the receiving HA's FSS program, the effective date of the contract between the family and the receiving HA is the first day of the month following the date the contract was signed by the family and the HA's representative. The expiration date of the contract between the receiving HA and the family must be the same as the expiration date of the contract between the initial HA and the family.

FSS Escrow Account

The income and rent numbers to be inserted on page one may be taken from the amounts on the last reexamination or interim determination before the family's initial participation in the FSS program, unless more than 120 days will pass between the effective date of the reexamination and the effective date of the contract of participation. If it has been more than 120 days, the HA must conduct a new reexamination or interim redetermination.

If a family moves under HCV portability procedures and is going to participate in the receiving HA's FSS program, the receiving HA must use the amounts listed for annual income, earned income, and family rent on page one of the contract between the initial HA and the family.

Changes to the Contract

This contract of participation can only be changed to modify the contract term, the head of the family, or the individual training and services plans.

Any change of the head of the family under the contract must be included as an attachment to the contract. The attachment must contain the name of the new designated head of the family, the signatures of the new head of the family and an HA representative, and the date signed.

Any change/s to an individual training and services plan must be included as a revision to the individual training and services plan (attachment) to which the change applies. The revision must include the item changed, signatures of the participant and an HA representative, and the date signed.

For extensions to the contract term, see the "Term of Contract" section.

If, twelve months after the effective date of the contract, a family in the HCV FSS program moves outside of the HA's jurisdiction under HCV portability procedures, an HA may take one of the following actions:

- (1) The initial HA may permit the family to continue to participate in its FSS program, if the family demonstrates to the initial HA's satisfaction that it

can meet the family responsibilities of the contract in the new location. In this case, the existing contract remains in effect with no change. The initial HA must transfer the family's FSS escrow account balance when the family is absorbed by the receiving HA.

- (2) The receiving HA may permit the family to participate in its FSS program. If so, the initial HA must terminate its contract with the family. The initial HA must also transfer the family's FSS escrow account balance when the family is absorbed by the receiving HA. The receiving HA will execute a new contract with the family.
- (3) In cases where the family cannot fulfill its family obligations in the new location, and the receiving HA does not permit the family to participate in its FSS program, the contract between the initial HA and the family shall terminate and the family will lose the funds in its FSS escrow account.

Individual Training and Services Plans

The contract must include an individual training and services plan for the head of the family. Other family members age eighteen and older may choose to execute an individual training and services plan if agreed to by the HA.

The resources and supportive services to be provided to each family member must be listed in the individual training and services plans which are attachments to the contract of participation.

Page one of each participant's individual training and services plan includes space for the final goal and the first interim goal needed to achieve the final goal. The additional pages provide a format for recording each interim goal and specific information related to its achievement. The first page of each participant's plan must be signed by the participant and an HA representative.

Interim goals must be specified along with the activities and services needed to achieve them. For example, a single mother with two children who has an interim goal of completing her secondary education might require several different activities and services to achieve that goal. These could include transportation, tutoring, and child care.

All completion dates included in the individual training and services plans must be on or before the contract of participation expires.

One of the interim goals for families receiving welfare assistance is to become independent of welfare assistance for at least twelve consecutive months before the end of the contract. Any family that is receiving welfare assistance **must** have this included as an interim goal in the head of the family's individual training and services plan.

The final goal listed on the individual training and services plan of the head of the family **must** include getting and maintaining suitable employment specific to that individual's skills, education, job training, and the available job opportunities in the area.

Incentives

If the HA has chosen to offer other incentives in connection with the FSS program, these incentives may be included in the individual training and services plans or as an attachment to this contract.

EXHIBIT B

Contract of Participation

**Family Self-Sufficiency (FSS)
Program Contract of Participation**
Housing Choice Voucher
Public and Indian Housing Programs

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

OMB Approval No. 2577-0178
(exp. 08/31/2020)

This Contract of Participation for the Family Self-Sufficiency (FSS) Program is between _____

_____, Housing Agency (HA), and
_____ head of the FSS family.

The FSS family includes everyone in the household, and is referred to in this contract as "family".

Type of FSS Program.

The family is a participant in the: (Check only one)

- Housing Choice Voucher (HCV) FSS Program
- Public Housing FSS Program
- Indian Housing FSS Program

Purpose of Contract

The purpose of this contract is to state the rights and responsibilities of the family and the HA, the resources and supportive services to be provided to the family, and the activities to be completed by the family.

Term of Contract

This contract will be effective on _____.

This contract will expire on _____.

The HA can extend the term of the contract up to 2 years if the family gives the HA a written request for an extension and the HA finds that *good cause* exists for the extension.

Resources and Supportive Services

During the term of the contract, the HA will try to provide the resources and services listed in the individual training and services plans. If the resources and services are not available, the HA will try to substitute other resources and services. However, the HA has no liability to the family if the resources and services are not provided.

FSS Escrow Account

The HA will establish an FSS escrow account for the family. A portion of the increases in the family's rent because of increases in earned income will be credited to the FSS escrow account in accordance with HUD requirements.

Listed below are the family's annual income, earned income, and family rent when the family begins the FSS program. These amounts will be used to determine the amount credited to the family's FSS escrow account because of future increases in earned income.

Annual Income \$ _____

Earned Income \$ _____

Family Rent (Total Tenant Payment or, for HCV program,

30% of monthly Adjusted Income) \$ _____

The HA will invest the FSS escrow account funds in HUD-approved investments.

The HA will give the family a report on the amount in the family's FSS escrow account at least once a year.

If the family is participating in the HCV program and moves outside the HA's jurisdiction under HCV portability procedures, the HA may transfer the balance of the family's FSS escrow account to another HA.

Withdrawal of Funds from FSS Escrow Account

The HA may permit the family to withdraw funds from the FSS escrow account before completion of the contract if the family has completed specific interim goals, designated by the HA, and needs some of the FSS escrow account funds to complete the contract (example: to pay for school costs).

The HA will pay the head of the family the amount in the family's FSS escrow account, less any amount owed to the HA, when:

- (1) the HA determines that the family has completed this contract, and,
- (2) at the time of contract completion, the head of the family provides written certification to the HA that no member of the family is receiving welfare assistance. Welfare assistance, for the FSS program, means income assistance from Federal or state welfare programs, and includes only cash maintenance payments designed to meet a family's ongoing basic needs.

If the head of the family leaves the assisted unit, the remaining family members may, after consulting the HA, name another family member to receive the FSS escrow account funds.

Loss of FSS Escrow Account

The family will not receive the funds in its FSS escrow account if:

- (1) the contract of participation is terminated,
- (2) the contract of participation is declared null and void; or
- (3) the family has not met its family responsibilities within the times specified as stated in this contract.

Family Responsibilities

The head of the family must:

- o Seek and maintain suitable employment after completion of the job training programs listed in the individual training and services plan. The HA, after consulting with the head of the family, will determine what employment is suitable based on the skills, education, and job training of that individual and available job opportunities in the area.

The head of the family and those family members who have decided, with HA agreement, to execute an individual training and services plan, must:

- o Complete the activities within the dates listed in each individual training and services plan.
- o Provide the HA and HUD with information about the

family's participation in the FSS program in order to help the HA and HUD evaluate the FSS program. This could include information regarding employment, job interviews, training, educational attendance, and other FSS services and activities.

All family members must:

- Comply with the terms of the lease.
- If receiving welfare assistance, become independent of welfare assistance and remain independent of welfare assistance for at least 12 consecutive months before the contract expires.
- If participating in the HCV program, the family must comply with the family obligations under the HCV program and live in the jurisdiction of the HA that enrolled the family in the FSS program at least 12 months from the effective date of this contract, unless the initial PHA has approved the family's request to move outside its jurisdiction under portability.

Corrective Actions for Failure to meet Family Responsibilities

If any member of the family does not meet his or her responsibilities under this contract, the family will not receive the money in its FSS escrow account and the HA may:

- (1) stop supportive services for the family,
- (2) terminate the family's participation in the FSS program, and
- (3) if the family is participating in the HCV program, terminate the assistance, when allowed by HUD requirements.

HA Responsibilities

- Attempt to obtain commitments from public and private sources for supportive services for families.
- Establish an FSS escrow account for the family, invest the escrow account funds, and give the family a report on the amount in the FSS escrow account at least once a year.
- Determine which, if any, interim goals must be completed before any FSS escrow funds may be paid to the family; and pay a portion of the FSS escrow account to the family if the HA determines that the family has met these specific interim goals and needs the funds from the FSS escrow account to complete the contract.
- Determine if the family has completed this contract.
- Pay the family the amount in its FSS escrow account, if the family has completed the contract and the head of the family has provided written certification that no member of the family is receiving welfare assistance.

Completion of the Contract of Participation

Completion of the contract occurs when the HA determines that:

- (1) the family has fulfilled all of its responsibilities under the contract; or
- (2) 30 percent of the family's monthly adjusted income equals or is greater than the Fair Market Rent amount for the unit size for which the family qualifies.

Termination of the Contract of Participation

The HA may terminate this contract if:

- (1) the family and the HA agree to terminate the contract;
- (2) the HA determines that the family has not fulfilled its responsibilities under this contract;
- (3) the family withdraws from the FSS program;
- (4) an act occurs that is inconsistent with the purpose of the FSS program; or
- (5) the HA is permitted in accordance with HUD requirements.

The HA may declare this contract null and void if the resources and services necessary to complete the contract are not available.

The HA must give a notice of termination or nullification to the head of the family. The notice must state the reasons for the HA decision to terminate or nullify the contract.

If the contract is terminated or declared null and void, the family has no right to receive funds from the family's FSS escrow account. The HA must close the family's FSS escrow account and may use the funds for purposes in accordance with HUD requirements.

If the family is participating in the HCV program, the HA will terminate the contract if the family moves outside the HA's jurisdiction under portability procedures and enters the FSS program of another HA.

If the family is participating in the HCV program, this contract is automatically terminated if the family's assistance is terminated in accordance with HUD requirements.

Conflict with the Public or Indian Housing Lease

If part of this contract conflicts with the public or Indian housing lease, the lease will prevail.

Compliance with HUD Regulations and Requirements

The contract of participation must be interpreted and administered in accordance with HUD regulations and requirements. Terms and figures, such as the income and rent amount on page 1, are subject to correction by the HA for compliance with HUD regulations and requirements. The HA must notify the family in writing of any adjustments made to the contract.

Signatures:

Family

Housing Agency

(Signature of Head of Family)

(Name of HA)

(Date Signed)

(Signature of HA Official)

(Official Title)

(Date Signed)

EXHIBIT C

Individual Training and Services Plan (ITSP)

Family Self-Sufficiency Program Individual Training and Services Plan

Attachment _____

Name of Participant _____

Social Security Number _____

Final Goal

Interim Goal Number _____

Date Accomplished _____

Activities/Services

Responsible Parties

Date/s

Comments

Signatures:

Family

(Participant)

(Date Signed)

Housing Agency

(Signature of HA Representative)

(Date Signed)

Previous editions are obsolete

Page 1 of

form HUD-52650 (08/2017)
ref. Handbook 7420.8

Family Self-Sufficiency Program Individual Training and Services Plan

Attachment _____

Name of Participant	Social Security Number
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Interim Goal Number _____

Date Accomplished

Activities/Services	Responsible Parties	Date/s
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Comments

EXHIBIT D

FSS Escrow Account Credit Worksheet

Family Self-Sufficiency Program FSS Escrow Account Credit Worksheet

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

OMB Approval No. 2577-0178
(exp.08/31/2020)

Escrow credit must be determined at each reexamination and interim determination occurring after the effective date of the FSS Contract of Participation while the family is participating in the FSS program.

Head of the FSS family	Date
1. Current Annual Income (Enter amount from line 7i of form HUD-50058.)	1.
2. Applicable Lower-Income Limit (Enter the current lower-income limit for the jurisdiction in which the FSS family is living.)	2.
3. Current Adjusted Income (Enter amount on line 8y of form HUD-50058.) If line 3 is greater than line 2, this family does not qualify for an FSS credit.	3.
4. Earned income included in line 1 (Add up the income items coded B, M, F, HA, and W in column 7f of form HUD-50058.)	4.
5. Earned income included in Annual Income on effective date of the FSS Contract of Participation. (Enter amount from contract of participation.)	5.
6. Increase in earned income since the effective date of the FSS Contract of Participation. (Subtract line 5 from line 4. If negative, enter 0.)	6.
7. Current Annual Income less increase in earned income since the effective date of the FSS Contract of Participation. (Subtract line 6 from line 1.)	7.
8. Thirty percent of current monthly Adjusted Income (Line 3 divided by 40. The calculated amount should equal the amount on line 9f of form HUD-50058.)	8.
9. Current Adjusted Income less increase in earned income since the effective date of the FSS Contract of Participation. (Subtract line 6 from line 3.)	9.
10. 30% of current monthly Adjusted Income less increase in earned income since the effective date of the FSS Contract of Participation. (Line 9 divided by 40)	10.
11. 10% of current monthly Annual Income less increase in earned income since the effective date of the FSS Contract of Participation. (Line 7 divided by 120)	11.
12. If applicable, welfare rent (enter amount on line 9g of form HUD-50058) or public housing ceiling rent (enter amount on line 10c of form HUD-50058)	12.
13. TTP based on current Annual Income less increase in earned income since effective date of the FSS Contract of Participation. (If housing choice vouchers, enter the amount on line 10, otherwise, enter the greater of line 10, 11, or 12.)	13.
14. Difference between 30% of current monthly Adjusted Income and TTP adjusted for increases in earned income. (Subtract line 13 from line 8. Enter 0 if negative.)	14.
15. Current TTP (Enter the amount on line 9j of form HUD-50058 or, in the case of housing choice vouchers, enter the amount on line 8 of this form.)	15.
16. TTP on effective date of the FSS Contract of Participation or, in the case of housing choice vouchers, 30% of monthly Adjusted Income on effective date of the FSS Contract of Participation. (Enter amount from contract of participation.)	16.
17. Difference between current TTP and TTP on effective date of the FSS Contract of Participation. (Subtract line 16 from line 15. Enter 0 if negative.)	17.
18. Enter the lesser of line 14 or line 17.	18.
19. Applicable Very Low-Income Limit (Enter the current very low-income limit for the jurisdiction in which the FSS family is living.)	19.
20. Amount by which Adjusted Income exceeds the Very Low-Income Limit (Subtract line 19 from line 3.)	20.
21. 30% of the amount by which Adjusted Income exceeds the Very Low-Income Limit (Line 20 divided by 40)	21.
22. Escrow credit (Subtract line 21 from line 18.)	22.

This HUD form is optional and is used here to illustrate the process. PHAs may develop their own FSS Worksheet.

Previous Editions are Obsolete

form HUD-52652 (08/17)
ref. Handbook 7420.8

Each Housing Agency (HA) must enter into a contract of participation with each eligible family that opts to participate in the FSS program. Each HA must consult with local officials to develop an action plan containing descriptions of the size, characteristics, and needs of the population to be served by its proposed FSS program; the services and activities it will provide; how the program will be implemented; the public and private resources through which services and activities will be provided; a time-table for implementation; and other data necessary for HUD to ensure coordinated implementation of program services and activities.

Public reporting burden for this collection of information is estimated to average 1.0 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. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Reports Management Officer, Paperwork Reduction Project (2577-0178), Office of Information Technology, U.S. Department of Housing and Urban Development, Washington, D.C. 20410-3600.

Do not send this form to the above address.

Response to this collection of information is mandatory by law (Section 23 (c) & (g)) of the U.S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act (PL 101-625) for participation in the FSS program.

"Privacy Act Statement. This statement is provided pursuant to the Privacy Act of 1974, 5 USC § 552a. The authority for collecting personally identifiable information (PII) in the Regulatory Consistency Communication Board (RCCB) Electronic Feedback Form is based in Section 313 of Public Law 112-95," to be included on all forms, prior to being submitted for OMB approval." The information collected on this form is considered sensitive and is protected by the Privacy Act. The Privacy Act requires that these records be maintained with appropriate administrative, technical, and physical safeguards to ensure their security and confidentiality. In addition, these records should be protected against any anticipated threats to, their security or integrity which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom the information is maintained.

HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Instructions for Completing the FSS Escrow Account Credit Worksheet

1. An escrow credit must be determined at each reexamination and interim determination occurring after the effective date of the FSS contract of participation while the family is participating in the FSS program.
2. The amount of the escrow credit can be calculated using Form HUD-52652, or another document which incorporates the procedures in Form HUD-52652.
3. The amount of the escrow credit will vary depending on the income level of each FSS family and is based on increases of **earned income** since the effective date of the contract of participation. If the family's adjusted income exceeds the lower-income limit in the jurisdiction in which the FSS family is living (the amount on line 3 is greater than the amount on line 2), the family does not qualify for an escrow credit. In such cases, line 4 – line 22 of Form HUD 52652 will not be completed.

Previous Editions are Obsolete

form HUD 52652 (08/2017)
ref. Handbook 7420.8



HUD-934.3 (1-80)

**THE HOUSING AUTHORITY OF THE
CITY OF LAKELAND
ADA & SECTION 504
POLICY AND REGULATIONS
2023**

ADA & SECTION 504 REGULATIONS

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ADA & SECTION 504 REGULATIONS

504 REGULATIONS/RELAY CENTERS

The 504 Regulations of the 1973 Rehabilitation Act require equal communication access for handicapped individuals. To enable hearing-impaired applicants and/or residents to communicate with your property, you could use one of the following methods: engage an interpreter, write a letter, use a telecommunication device for deaf persons (TDD) or use a relay center.

The relay centers are basically a third party who translates your vocal message into a typed one for the hearing-impaired. Conversely, the typed message from the hearing-impaired will be relayed verbally to you by the relay center. It is, in essence, a three-way conversation with the relay center as the neutral link between the hearing-impaired person with their TDD and the hearing person. If you have any questions about how the relay center operates in your state, please call them directly.

The way the relay centers generally operate is described in the example below:

1. The hearing-impaired resident and/or applicant, using a telecommunication device (TDD), calls the relay center and types in a message like, "Hi, I need to call an apartment complex at the following telephone number."
2. The relay center receives the message on their TDD, calls the property, identifies themselves and relays the information verbally to the property staff person answering the phone.
3. The property staff person verbally gives the required information to the relay center.
4. The relay center, using TDD, types in and sends the information to the hearing-impaired person.
5. This procedure continues until the parties finish their conversation and hang up.

ADA & SECTION 504 REGULATIONS

Remember: The relay center is a neutral, non-involved party, merely relaying information and aiding you in communicating with a hearing-impaired person. Because most relay centers are open 7 days a week, 24 hours a day, after-hours maintenance emergencies, i.e., plumbing backups, etc., can be handled using the relay center. If the hearing-impaired person has a TDD, they could call the relay center, ask the center to contact the after-hours number and report the problem to Management. Then, simply follow your regular procedure for handling emergency calls once they are reported. Do not use the relay center for any reason other than to communicate with hearing-impaired individuals if needed. You can still communicate through an interpreter for meetings in your office or by sending a letter to the hearing-impaired applicant and/or resident.

If the State of Florida has a relay center, inform all hearing-impaired residents and/or applicants of the service and telephone numbers. They can use the relay center to communicate with you by telephone to ask a question or to report a maintenance emergency or request. Of course, you can still communicate through an interpreter for meetings in your office or by sending a letter. Pay special attention to the Limited English Proficiency rules and requirements.

ADA & SECTION 504 REGULATIONS

504 REGULATIONS/RELAY CENTER NUMBERS

Instead of a TDD, we are using the relay system set up in our state. Included is a sample of what needs to be posted. Post this in a conspicuous place where all applicants, visiting residents, etc. can see it.

The Housing Manager must contact the Vice-President and discuss adding this number to any item that shows your office number, i.e., your letterhead, signage, brochure, resident handbooks, promotional materials, etc.

Listed below is the telephone numbers for the relay centers.

1. Florida 1-800-955-8771 (TTY Only) 1-800-955-8770 (Voice)

ADA & SECTION 504 REGULATIONS

504 REGULATIONS/SUBSIDIZED PROPERTIES

A. Accessibility

We are required by the 504 Handicap Regulations to operate our subsidized housing programs so that they are readily accessible and usable by individuals with handicaps.

All properties must have the following:

1. Curb-cuts for wheelchair access to common areas.
2. Designated parking spaces near the Rental Office marked with the universal symbol for handicapped individuals.
3. An effective system to communicate with hearing-impaired individuals, i.e., relay centers. **(Do not purchase a TDD.)** Use the relay center located in our state.

Housing Managers must obtain approval from the Vice-President before scheduling any work, making an accommodation or purchasing any equipment or item to comply with these regulations.

B. Reasonable Accommodations

We are required to make, upon request, reasonable accommodations for individuals who are handicapped or disabled.

Listed below are examples of accommodations to be considered for use on-site upon request:

1. Lighted smoke detectors for the hearing-impaired. These visual alarm systems are available from many of your providers.

SPECIAL NOTE: landlords are required to provide to residents who are deaf or hearing-impaired a special smoke detector which, when activated, will provide a signal that is sufficient to warn a deaf or hearing-impaired occupant.

2. Adjust peephole in doors.
3. Audible alarm system in common areas and units for visually impaired individuals.
4. Information should be available in a variety of formats, both visual and audible, i.e., information read aloud, larger print, etc.

ADA & SECTION 504 REGULATIONS

5. Auxiliary aids for persons with impaired vision include individual readers, brailled material, audio recordings, etc.

Leases can be obtained in braille from:

The Bower Hill Brailist Foundation

70 Moffot Street

Pittsburgh, Pennsylvania 15241

Phone: 412/561-8635

*The Foundation charges per brailled page plus the cost of binding.

6. Auxiliary aids for persons with impaired hearing include telephone handset amplifiers, arrangements for interpreters during application processing, resident meetings, etc., note takers, written material, etc. We are not required to provide TDD's or telephone handset amplifiers for the individual's personal use.
7. Allocate and mark additional parking spaces near building entrances with the universal handicapped symbol. Assign parking spaces close to unit.
8. Install an electrical outlet adjacent to phone hookup to accommodate a telecommunications device.
9. Install an apartment door light system in the unit to announce visitors for the hearing-impaired.
10. Place tactile signage in common areas and on entry doors.
11. Provide alternate space for interviews, i.e., home visits.
12. Add or redesign equipment or furnishings in common areas.
13. Referral to sources of programs or services in accessible facilities.
14. Install rails, ramps, grab bars, etc.
15. Transfers, we may be required to pay for these expenses.

We must take any actions to accommodate individuals with disabilities unless the action poses an undue financial and administrative burden.

ADA & SECTION 504 REGULATIONS

REMEMBER:

1. Regulations require property owners to make reasonable modifications of existing premises to accommodate the handicaps of their residents or applicants. The cost is a project expense. Housing Managers must discuss with the one of the Vice-Presidents all proposed accommodations and obtain approval prior to making any modification. All alterations to common areas and/or interior units must be reviewed by the 504 Coordinator prior to scheduling work.
2. Do not deny any resident or applicant's request for accommodation without obtaining approval from the 504 Coordinator, Carlos R. Pizarro, Senior Vice-President. Forward those accommodation requests to the 504 Coordinator for review. Use the form included in this Manual to submit a request for denial of an alteration. This form is also available on request.
3. If you are denying an applicant's or resident's request for accommodations for their handicap, you must have approval from the 504 Coordinator.

In addition to the specific resident or applicant accommodation requests, you must contact the 504 Coordinator to determine the impact of the 504 requirements if you are planning any alterations to common areas (i.e., laundry rooms, activity areas, community room, lobby, office, etc.) and/or unit interiors (i.e., rehabilitation). Remember to contact the 504 Coordinator prior to scheduling the alterations.

4. Accommodations are handicap/disability specific; therefore, decisions must be made on a case-by-case basis.
5. Housing discrimination against the mentally and physically handicapped is prohibited by law.
6. The 504 Coordinator is at the Main Office is Carlos R. Pizarro.

NOTE: This Policy applies to subsidized properties only and/or properties receiving HOME funds and/or Federal funds.

If any required work will place an undue administrative burden or financial burden on the property, contact the 504 Coordinator for a final decision in writing, note it directly on the request for denial of an alteration form, attach backup documentation, bids, owner correspondence, etc. This means that the Executive Director will make the final decision whether or not the required work will place an undue financial or administrative burden on the property.

ADA & SECTION 504 REGULATIONS

CORRESPONDENCE WITH THE PUBLIC

HUD has mandated that all correspondence with the public contain a notification that the property does not discriminate on the basis of handicapped status. This disclaimer must appear on all written correspondence without exception.

RENTAL OFFICE ACCESSIBILITY

All properties with rental offices that are not handicap accessible must post a sign which reads as follows:

“Any individual with disabilities who requires assistance in order to access the Rental Office may contact the office by dialing (fill in with office telephone number) or (fill in with TDD Relay number for your state).”

Then you must develop a plan that allows you to meet the individual in an alternative accessible location (i.e., Community Room or community space on site, home visit, or a community space at a local library, etc.).

Post this sign in a conspicuous place where all applicants, visitors, etc., can see it. Call the 504 Coordinator if you have any questions.

ADA & SECTION 504 REGULATIONS

HANDICAP ACCESSIBLE UNITS **SUBSIDIZED/HOME PROPERTIES**

We are required by the 504 Handicap Regulations to maximize the use of handicap accessible units by eligible individuals whose disability requires the unit's accessibility features. Therefore, before offering an accessible vacant unit to a non-handicapped applicant, the unit must be offered:

First, to a current resident household whose family member has a handicap or disability requiring the accessibility features.

Second, to the next eligible qualified applicant on the waiting list whose family member has handicaps or disabilities requiring the accessibility features of the unit.

The HUD makes clear that when an applicant requests an accessible unit for the handicapped, inquiries may be made to determine whether an applicant is qualified for the dwelling or qualified for a priority. However, it is unlawful to make an inquiry to determine whether an applicant is handicapped for eligibility purposes.

UNIT TRANSFERS AS A REASONABLE ACCOMODATION **SUBSIDIZED/HOME PROPERTIES**

If the resident requests a transfer as a part of a reasonable accommodation request or if a transfer is necessary to grant a reasonable accommodation request, we are obligated to transfer the resident. Furthermore, unless the transfer places an undue financial or administrative burden on the owner, the cost of the transfer shall be paid by the owner.

ADA & SECTION 504 REGULATIONS

HANDICAP REGULATIONS/CONVENTIONAL/SECTION 8 LANDLORDS PROPERTIES

Regulations require that property owners allow handicapped residents and/or approved applicants, at their own expense, to make reasonable modifications of existing premises to accommodate their handicaps.

In addition, the resident will be required to restore the interior of the premises, where it is reasonable to do so, to the condition that existed before the modification, reasonable wear and tear excepted.

Forward all alteration requests to the Lakeland Housing Authority Main Office. Use the form titled "Request for Alterations" which is part of this Manual. The form is also available on the LHA Intranet. The requests will be reviewed by the 504 Coordinator. Do not agree to any alteration without prior approval.

Housing discrimination against the mentally and physically handicapped is prohibited by law.

Conventional properties must comply with the requirement of Americans with Disability Act (ADA), not Section 504. Residents may make modification to their unit at their own expense with the Vice- President's approval.

ADA & SECTION 504 REGULATIONS

REQUESTING A REASONABLE ACCOMMODATION

(Send this letter whenever a resident requests a reasonable accommodation and attach the Resident's Reasonable Accommodation Request Form.)

[Name of Property] is an equal housing opportunity provider and does not discriminate against our residents with disabilities. It is our policy to provide reasonable accommodations to our residents who are disabled and because of that disability need a change or exception to our usual rules or policies to be able to fully use and enjoy this community. It is necessary, therefore, to obtain documentation of the need for the requested accommodation. If you are requesting an exception to our prohibition against pets on the property, we will need you to provide the following information and forms:

1. Fill out and return to the leasing office the Reasonable Accommodations Request Form.
2. Sign the Verification Form and return it to the leasing office with the Request Form.
3. Upon receipt of the Verification Form management will mail the form to the verifier.
4. When it is returned, management will notify you in writing of the determination concerning your request.
5. If you are requesting an assist or service animal, you will need to sign the lease addendum form that describes your responsibilities concerning the animal.
6. If the resident receives project based federal subsidy, the cost of any unit transfers will be the responsibility of the Owner unless said transfer cost would be undue financial and administrative burden.

If you need assistance in this process, please contact the Housing Manager.

Sincerely,

Housing Manager

Date

ADA & SECTION 504 REGULATIONS

RESIDENT'S REASONABLE ACCOMMODATION REQUEST FORM

[Name of property] is committed to the letter and spirit of the Fair Housing Act, which, among other things, prohibits discrimination against persons with disabilities. In accordance with our statutory responsibilities and management policies, we will make reasonable accommodations in our rules, policies, practices, or services, when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy their housing communities. If you are requesting such an accommodation, please fill out this form and return it to the Manager.

Resident's Name: _____

Address: _____

Date of Request: _____

Please describe the accommodation (exception to our usual rule or policy) that you are requesting:

Do you consider yourself to be disabled? YES NO

*The Fair Housing Act defines disability as a physical or mental impairment that **substantially** limits one or more major life activities. The Supreme Court has determined that to meet this definition a person must have **an impairment that prevents or severely restricts the person from doing activities that are of central importance in most peoples' daily lives.***

Is the requested accommodation necessary for your use and enjoyment of your apartment community?
 YES NO

Please provide the contact information for a third-party verifier to whom we will send the attached form:

Name: _____

Position: _____

Address: _____

Telephone: _____

ADA & SECTION 504 REGULATIONS

REASONABLE ACCOMMODATIONS VERIFICATION FORM

[Apartment complex name] provides reasonable accommodations to our residents with disabilities who have verifiable need for the reasonable accommodation. A reasonable accommodation is an exception made to the usual rules or policies *made necessary because of a disability* for the resident to use and enjoy an apartment community. The resident has authorized you to provide the information requested on this form. Please answer the following questions:

Name of Resident (print): _____

Request for Reasonable Accommodation: _____

Signature of Resident: _____

This signature authorizes the verifier to provide answers to the questions below to the best of his/her knowledge of this resident.

1. Is this resident disabled? YES NO I DON'T KNOW

*The Fair Housing Act defines disability as a physical or mental impairment that **substantially** limits one or more major life activities. The Supreme Court has determined that to meet this definition a person must have **an impairment that prevents or severely restricts the person from doing activities that are of central importance in most peoples' daily lives.***

2. Please describe in what manner this disability restricts the resident in activities that of central importance to his or her daily life:

3. Does this resident need the accommodation requested above to be able to live in his/her apartment community? YES NO

4. If yes, please describe how this accommodation will enable the resident to use or enjoy this apartment community.

5. If necessary, will you be willing to testify in a court of law concerning the information provided in this form? YES NO

Signature of Verifier _____ Date _____

ADA & SECTION 504 REGULATIONS

REQUEST FOR ALTERATION

Property Name: _____

Landlord Name: _____

Date: _____

Alteration Requested (include pertinent details, attach all proposals, names of contractors, etc.):

Approximate Cost:

Initial Cost: \$ _____

Restoration Cost: \$ _____

Resident Name: _____

Address: _____

Phone Number: _____

HCV Case Manager's Signature

HCV Manager's Signature

Approved Disapproved by Landlord: _____

Approved Disapproved by Section 504 Coordinator: _____

REMEMBER: The owner of the property will make the final decision on whether or not the alteration will place an undue financial burden on the property. When submitting to the Section 504 Coordinator, make sure you attach all pertinent documentation, including: Resident's Reasonable Accommodation Request form, Reasonable Accommodations Verification Form, drawings, specifications, bids, etc.

ADA & SECTION 504 REGULATIONS

NOTIFICATION OF DENIAL OF A REQUESTED ALTERATION OR CHANGE IN POLICY OR PROCEDURE

When your request for denial of a requested alteration has been approved by the Executive Director or the 504 Coordinator, use the following letter to tell applicants or residents that you are denying their request for a reasonable accommodation.

Date: _____

RE: Your Request for a Reasonable Accommodation

Dear _____:

You requested the following alteration or change in our policies or procedures. Attached is a copy your request form. We have denied your request because:

Check at least one box

_____ You do not meet the federal definition of an individual with disabilities.

_____ You do not need the requested change in order to enjoy or participate equally in our housing program.

_____ Your request is not reasonable because complying with it will create an “undue administrative and financial burden” (e.g., it would take an unreasonable amount of time or the cost would be too much).

_____ Your request is not reasonable because it will fundamentally change our housing program by requiring us to provide services that are not included in the program.

We relied on the following facts to deny your request:

We did the following to determine if we should approve your request:

If you disagree with our decision, you may request a meeting to discuss it with us. To arrange a meeting, please call our office at ____-____ or stop by the office.

Very truly yours,

Community Manager

ADA & SECTION 504 REGULATIONS

ASSIST ANIMAL POLICIES

While most of our properties prohibit pets, assist animals that are needed by persons with disabilities to use and enjoy the community are not considered pets. Upon a resident’s request and management’s receipts of proper verification, assist animals will be permitted as a reasonable accommodation.

ASSIST ANIMAL REQUEST PROCEDURE

1.	Obtain written request from the resident.	
2.	Provide the resident with an information sheet describing the steps.	
3.	Send out a verification form for completion by the verifier.	
4.	Follow up with the resident if the verification form is not received with two weeks.	
5.	If the returned verification form adequately justifies the animal, provide the resident with a letter granting permission to have animal if the resident agrees to execute the Animal Agreement and the Information Form.	
6.	Require that the resident sign an Assist Animal Agreement that becomes part of the resident’s lease. The Agreement lists the resident’s responsibilities for the care and management of the animal. Require that the resident also complete the Animal Information.	
7.	If the verification form does not justify animal, send the resident a letter denying permission for the animal.	

REMEMBER:

- 1. Obtain the request in writing and provide the information sheet prior to contacting supervisors.**
- 2. Send it to your 504 Coordinator for review and approval.**
- 3. Supervisors should regularly review residents’ files where a request for an animal was made to determine that the on-site staff used the proper forms and followed the appropriate process.**

Most reasonable accommodation requests should follow a nearly identical process. Use these forms for all requests.

ADA & SECTION 504 REGULATIONS

ASSIST ANIMAL AGREEMENT

THIS AGREEMENT entered into this ____ day of _____, by and between _____,
Owner/Agent and _____, Resident,

In consideration of their mutual promises, agree as follows:

1. Resident has requested permission from the owner to keep an animal as a reasonable accommodation due to a disability.
2. Management has confirmed that the Resident or a household member has a disability and has verified with a third-party professional that the animal is necessary for the Resident's or household member's use and enjoyment of the property.
3. The animal needed to provide the accommodation is described below:

4. Resident will supply landlord with a photograph of the animal by _____ (date).
5. Management agrees not to charge a pet deposit for the animal described above.
6. Resident will not acquire additional or different animals without permission of Management.
7. Resident is responsible for the animal and shall comply with all health and safety codes, and other applicable governmental laws and regulations, including, but not limited to licensing, vaccination, and leash and nuisance laws.
8. Resident agrees to maintain the animal in good health including maintaining proper annual vaccinations.
9. Resident represents that the animal is quiet and housebroken and will not cause any damage or unreasonably annoy other residents.
10. Resident agrees to always keeping the animal in his/her control and when it is necessary to take the animal outside, the animal will be always kept on a leash.
11. Resident is responsible to remove and properly dispose of any waste discharged upon the premises.
12. Animals are allowed in the common areas only to the extent that they allow the Resident equal access and enjoyment to the common area facilities.
13. Should the animal become a direct threat to the health and safety of members of management, other Residents or their guests, permission to keep the animal shall be revoked and the animal shall be removed from the premises within 24 hours.

ADA & SECTION 504 REGULATIONS

- 14. Any animal left unattended for 12 hours or more, or whose health is jeopardized by the Resident's neglect, mistreatment, or failure to care for the animal, shall be reported to the SPCA or other appropriate authority. Such circumstances shall be deemed an emergency for the purposes of the Owner/Agents right to enter the Resident's unit to allow such authority to remove the animal from the premises. The Owner/Agent accepts no responsibility for any animal so removed.
- 15. Resident agrees to indemnify, defend, and hold Owner/Agent harmless from and against any and all claims, actions, suits, judgments, and demands brought by any other party on account of or in connection with any activity or damage caused by the Resident's animal.
- 16. Resident will reimburse Management for any damage to the unit caused by or resulting from the animal, including replacement of the pad and carpeting, if necessary.
- 17. This Addendum is incorporated into the Lease Agreement and Resident agrees to abide by each and all such rules. Failure to comply may allow Owner/Agent to terminate the Lease Agreement as provided by the state landlord/tenant law.
- 18. Resident has read this Agreement and the Assist Animal information attachment and agrees to comply with the terms of the Agreement and such rules and regulations as may be reasonably adopted from time to time by Owner/Agent.

_____	_____	_____
Resident	Unit No.	Date

The above named resident(s) has read and signed this Agreement in my presence.

_____	_____	_____
Owner/Agent	Authorized Representative	Date

Attachment

ADA & SECTION 504 REGULATIONS

ASSIST ANIMAL INFORMATION
Attachment to the Assist Animal Agreement

Resident's Name: _____ Unit #: _____

Animal's Name: _____

Age: _____ Animal's Gender _____ License # _____

Description: _____

Veterinarian's Name: _____ Phone # _____

HEALTH RECORD

Last Vet Exam	Weight	Rabies	Distemper	Other	Spayed/Neutered

EMERGENCY CONTACT PERSON

Please designate below a person or agency that should be contacted in the event that your animal is left alone for over 12 hours, or in the event of an emergency. We will call the person or agency in order that they may attend to your animal.

NOTE: Management will not assume any responsibility or obligation for the care of your animal. If we are unable to reach the person or agency you designate, or if they are unwilling to accept responsibility for the animal, we will contact the local animal control agency to remove the animal from the premises.

Comments & Warnings

Resident's Signature

Date

ADA & SECTION 504 REGULATIONS

DENIAL OF ASSIST ANIMAL REQUEST

Dear Resident:

Upon full consideration, we find we must refuse your request for an animal as an exception to our no-pet policy. The basis for this decision is that the information provided in the Reasonable Accommodations Request form and the Verification form does not support making an exception to our policy. We do not believe this request is a reasonable accommodation necessary to your use and enjoyment of this community. While we certainly understand that pets are desirable for many persons, our policy is based upon our determination that our residents and community will benefit from prohibiting pets on this property.

Should you desire to discuss this matter further, please contact me and we can arrange a convenient time. If you have addition requests for reasonable accommodations, please obtain and complete a Reasonable Accommodations Request form.

Sincerely,

Community Manager

Date

ADA & SECTION 504 REGULATIONS

RULES FOR PET OWNERSHIP

**(In accordance with 24 Codified Federal Regulations (C.F.R.) Part 960)
Use with Vice- President approval only**

Residents, under certain conditions, may be permitted to own and keep common household pets in their dwelling units, in accordance with these Rules for Pet Ownership. Animals that are used to assist persons with disabilities are excluded from these Rules for Pet Ownership, provided that the disability status of the resident(s) is verified and the resident's need for an animal is verified by a third party professional as being essential to the resident's ability to live in the facility.

1. These Pet Rules will be incorporated by reference into all existing and future with agreements.
2. Pets are restricted to small-domesticated animals, such as dogs, cats, birds, fish, or turtles that are traditionally kept in the home for pleasure rather than for commercial purposes.
3. Fish tanks are limited to 20-gallon tanks. Any water damage is the pet owner's responsibility.
4. Dogs and cats must be registered with the Management Office prior to move-in. The information must be updated at least annually. The registration must include:
 - a. A certificate of inoculation from a licensed veterinarian;
 - b. Information sufficient to identify the pet and to demonstrate that it is a common household pet;
 - c. Proof of yearly licensing;
 - d. Name, address and phone number of one or more responsible parties who will care for pet if pet owner dies, is incapacitated, or is otherwise unable to care for the pet; and
 - e. A statement for pet owner to sign indicating that he or she has read the Pet Rules and agrees to comply with them.
5. Registration of a pet may be refused if:
 - a. The pet is not a common household pet;
 - b. The keeping of the pet would violate any applicable house rules;
 - c. The pet owner fails to provide complete pet registration information or fails to update the pet registration annually; or
 - d. A determination is made, based on the pet owner's habits and practices, that the pet owner will be unable to keep the pet in compliance with the Pet Rules and other lease obligations.

The pet's temperament may be considered as a factor in this determination. Registration will not be refused because of a determination that the pet owner is financially unable to care for the pet or that the pet is inappropriate based on the therapeutic value to the pet owner or the interests of the property or existing residents.

6. If registration of a pet is denied, notice of such refusal will be given to the pet owner. The notice will state the basis for the refusal and will be served according to the service of notice provision given in Pet Rule 28.c. Notice of refusal to register may also be combined with a notice of pet violation as provided for by Pet Rule 29.

ADA & SECTION 504 REGULATIONS

7. Dog and cat owners must pay an additional refundable \$300 pet security deposit for all properties. The deposit may be paid in installments, with the initial required payment not to be less than \$25 when the pet is brought onto the premises and subsequently required monthly payments not to be less than \$10 per month until the amount of the deposit is reached. The resident may pay more than these required amounts if he or she so desires, until the full amount of the \$300 pet deposit is reached.
8. The balance in the resident's pet deposit account will be refunded to the resident in a reasonable amount of time after the following conditions have been met:
 - a. The resident no longer has a pet; *or*
 - b. The resident no longer resides at this address; and
 - c. The apartment in which the pet was housed has been inspected for damage caused by the presence of the pet; and
 - d. All pet-related fines and reasonable expenses, which are directly attributable to the presence of the pet, have been paid.
9. Inspections of pet owner's apartment, after reasonable notice to the pet owner and during reasonable hours, are allowed. Such inspections will only be permitted if a signed written complaint is received, or if reasonable grounds are present to believe that the conduct or condition of a pet in the apartment constitutes, under applicable state or local law, a nuisance or threat to the health or safety of the other residents or other persons in the community.
10. Only one four-legged, warm-blooded pet, such as a cat or dog, is allowed per apartment.
11. Rottweillers and Pit-Bull breed dogs are not allowed.
12. The height of any warm-blooded pet, such as a cat or dog, must not exceed 15 inches tall at the shoulders and the weight of the pet must not exceed 20 pounds at maturity; owners must provide proof of such weight.
13. Cats and dogs must be spayed or neutered prior to occupancy. Verification is required.
14. Dogs and cats must have their nails clipped regularly.
15. Pets are not allowed in public areas of the building, including but not limited to, corridors, lobbies, elevators, etc., except while being carried.
16. Pets must be carried or walked on a leash on the grounds of the building, and walked in designated areas only.
17. No dogs shall be left unattended for longer than six hours. No other pets shall be left unattended for longer than twelve hours.
18. Pet owners must control the noise and odor caused by their pets.
19. Dogs must be housebroken and cats must be trained to a litter box.
20. Pets must be removed from the building and grounds to permit the pet to exercise or deposit waste.
21. Pet owners must pick up and properly dispose of all pet waste by bagging, tying tightly, and taking to the dumpster or dropping down the trash chute. Toilets may not be used.
22. Pet waste must be cleaned from cat litter boxes daily, and cat litter must be changed every week. Soiled litter must be disposed of by bagging, tying tightly, and taking to the dumpster or dropping down the trash chute.
23. A separate pet waste removal charge of \$5 per occurrence will be imposed on pet owners who fail to remove pet waste in accordance with the prescribed Pet Rules.

ADA & SECTION 504 REGULATIONS

24. Apartments occupied by cats and dogs must be fumigated at the pet owner's expense upon vacating, or upon any evidence of fleas.
25. Pet owners shall assume liability for any injury sustained by residents, guests or staff members that is caused by the owner's pet.
26. If the health or safety of a pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet, Management may contact the responsible party or parties listed in the pet registration required under Pet Rule 4.d. If the responsible party is unwilling or unable to care for the pet, or reasonable efforts to contact the responsible party have failed, the appropriate state or local authority may be requested to remove the pet. If no state or local authority is authorized to remove the pet, Management may enter the pet owner's apartment to remove the pet and to place the pet in a facility that will provide care and shelter until the pet owner or a representative of the pet owner is able to assume responsibility for the pet, but no longer than 30 days. The cost of the animal care facility provided shall be borne by the pet owner. If the pet owner or the pet owner's estate is unable or unwilling to pay, the cost of the animal care facility may be paid from the pet deposit.
27. If the pet becomes vicious, displays symptoms of severe illness, or demonstrates other behavior that constitutes an immediate threat to the health or safety of other residents, and the pet owner refuses to remove the pet or Management is unable to contact the pet owner, Management may request the state or local authority to remove the pet. If no state or local authority is authorized to remove the pet, Management may enter the premises, remove the pet, and place it in a facility that will provide care and shelter until the pet owner or a representative of the pet owner is able to assume responsibility for the pet, but no longer than 30 days. The cost of the animal care facility provided shall be borne by the pet owner. If the pet owner is unable or unwilling to pay, the cost of the animal care facility may be paid from the pet deposit.
28. Amendment of these Pet Rules may be made at any time by following the procedure given in this rule.
 - a. Notice of the proposed changes in the Pet Rules shall be served on each resident permitted to own a pet as provided in Pet Rule 28.c. The notice shall include the text of the proposed changes in the rules, state that the resident or resident's representative may submit written comments on the rules, and state that all comments must be submitted no later than 30 days from the effective date of the notice of the proposed changes in the rules. The notice may also announce the date, time, and place of a meeting to discuss the proposed changes in the rules.
 - b. The resident or resident's representative may submit written comments on the proposed changes in the Pet Rules by the date specified in the notice. One or more meetings with affected residents during the comment period may be convened to discuss the proposed changes in the rules, and residents' representatives may make oral comments on the proposed changes at these meetings. These comments made at the meetings will be considered only if they are summarized, reduced to writing, and submitted before the end of the comment period. The final changes in the Pet Rules will be developed after reviewing the resident's and residents' representatives' written comments and

ADA & SECTION 504 REGULATIONS

- written summaries of any resident-owner meetings. Attempts will be made to resolve the issues raised by the comments. The content of the final changes in the Pet Rules is within the sole discretion of the property owner, subject to the above provisions. Notice of the final Pet Rules will be served on each resident as provided in Pet Rule 28. This notice must include the text of the final Rules and specify the effective date of the final Rules.
- c. Notice as required under these Pet Rules must be made by:
 - i. Sending a letter by first class mail properly stamped and addressed to the resident at his or her apartment, with a proper return address; or
 - ii. Serving a copy of the notice on any adult answering the door at the resident's apartment, or if no adult responds, by placing the notice through the door, if possible, or else by attaching the notice to the door; or
 - iii. For service of notice to residents of a high-rise building, posting this notice in at least three conspicuous places within the building and maintaining the posted notices intact and in legible form for 30 days.
 - d. For purposes of computing time periods following service of the notice, service is effective on the day that all notices are delivered or mailed, or in the case of service by posting, on the day that all notices are initially posted.
29. The following procedures will be undertaken if these Pet Rules are violated:
- a. A written notice of pet rule violation must be served on the pet owner in accordance with the procedure outlined in Pet Rule 28;
 - b. The notice of the pet rule violation must:
 - i. Contain a brief statement of the factual basis for the determination and the pet rule or rules alleged to be violated;
 - ii. State that the pet owner has 10 days from the effective date of the notice to correct the violation (including, in appropriate circumstances, removal of the pet) or to make a written request for a meeting to discuss the violation;
 - iii. State that the pet owner is entitled to be accompanied by another person of his or her choice at the meeting, and;
 - iv. State that the pet owner's failure to correct the violation, to request a meeting, or to appear at a requested meeting, may result in initiation of procedures to terminate the pet owner's tenancy.
 - c. If the pet owner makes a timely request for a meeting to discuss an alleged pet rule violation, a mutually agreeable time and place for the meeting shall be established, but no later than 15 days from the effective date of the service of the notice of pet rule violation, unless all parties agree to a later date. At the pet rule violation meeting, the pet owner and Management shall discuss any alleged pet rule violation and attempt to correct it. As a result of this meeting, the pet owner may be given additional time to correct the violation.
 - d. If the pet owner and Management are unable to resolve the pet rule violation at the pet rule violation meeting, or if Management determines that the pet owner has failed to correct the pet rule violation within any additional time provided for this purpose, written notice may be served on the pet owner in accordance with Pet Rule 28, or at the meeting, if appropriate, requiring the pet owner to remove the pet.
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ADA & SECTION 504 REGULATIONS

- e. The notice for pet removal must:
 - i. Contain a brief statement of the factual basis for the determination and the pet rule or rules that have been violated;
 - ii. State that the pet owner must remove the pet within 10 days of the effective date of the notice of the pet removal, or of the date meeting if notice is served at the meeting; and
 - iii. State that the failure to remove the pet may result in initiation of procedures to terminate the pet owner's tenancy.
- f. Steps may not be initiated to terminate a pet owner's tenancy based on a pet rule violation, unless:
 - i. The pet owner has failed to remove the pet or correct a Pet Rule violation within the acceptable time periods specified in this Pet Rule, including any additional time permitted the pet owner; and
 - ii. The pet rule violation is sufficient to begin procedures to terminate the pet owner's tenancy under the terms of the lease and applicable regulations.
- g. Procedures to remove a pet in accordance with provisions of applicable state or local law may be initiated at any time if the pet's conduct or condition is duly determined to constitute a nuisance or a threat to the health or safety of other occupants of the project or of other persons of the community where the property is located.



**AN AMENDMENT TO THE
ADMINISTRATIVE PLAN
FOR THE INCLUSION OF A
HCV HOMEOWNERSHIP PROGRAM**

**Housing Authority of the
City of Lakeland**

Effective January 1, 2023

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GENERAL PROVISIONS

The Public Housing Reform Act of 1998 includes language that allows the United States Department of Housing and Urban Development (HUD) to assist Section 8 Housing Choice Voucher Program (HCVP) recipients to purchase a home. HUD published the Section 8 Homeownership Program Final Rule that implemented this option under Section 8(y) of the U.S. Housing Act of 1937 that authorized a public housing agency (PHA) to provide tenant-based assistance for an eligible family that purchases a home. The rule became effective on October 12, 2000. Title 24 Code of Federal Regulations (CFR) 982.625(c)(1)(i) enables the Housing Authority of the City of Lakeland (LHA) to provide monthly homeownership assistance payments to eligible families.

The Housing Choice Voucher (HCV) Homeownership Program (HP) allows qualified participants the option to purchase a home and use the HCV Housing Assistance Payment (HAP) towards mortgage payments and other allowable housing costs.

The purpose of the HCV HP Administrative Plan is to establish policies for carrying out the program in a manner consistent with HUD requirements and local objectives. The Plan covers both admission and participation in the program. The LHA is responsible for complying with all changes in HUD regulations pertaining to these programs. If such changes conflict with this Plan, HUD regulations will have precedence.

The LHA's policies and practices are designed to provide assurances that all persons with disabilities will be provided reasonable accommodations so that they may fully access the housing program. Persons requiring special accommodations due to a disability must notify the LHA, in writing, of their needs. The reasonable accommodation request will be verified via a Licensed Professional and then reviewed by the LHA. The LHA will provide written notification of either the approval or denial of the reasonable accommodation request. In matters where the LHA has discretion, waivers to existing policy shall be determined by the Executive Director or his designee.

A. FAMILY ELIGIBILITY REQUIREMENTS

The HCV HP of the LHA is available to qualified Housing Choice Voucher participants. Participation in the HCV HP is voluntary. Applicants must meet the following criteria to be considered for the HCV HP.

1. First-Time Homeowner

An eligible Section 8 HCVP family must be defined as a first-time home buyer. A first-time home buyer means that no member of the household has had any interest or ownership in any residence during the three years prior to applying for homeownership assistance or at the commencement of participation in the homeownership program. The purchaser will be required to sign a sworn statement attesting that they have not owned a home or have been included on a home loan. In addition, copies of the previous three years federal tax returns are required and will be reviewed to ascertain that no mortgage interest or real estate tax deductions have been claimed.

Single parents or displaced homemakers who owned a home while married or resided in a home owned by a spouse also may qualify as first time homebuyers, provided that three years have passed since the homeownership ended.

2. Minimum Income Requirements

Calculation of income eligibility for the purpose of admission to the HCV HP will be conducted under the guidelines for HCV rental assistance, as noted in this Administrative Plan.

The head of household, spouse and/or other adult member(s) of the household that will hold title to the home must have a combined annual gross income of not less than 50% of the Area Median Income (AMI) adjusted for the family size.

A family whose income does not meet the 50% AMI requirement, but does meet all other HP requirements, may request admission provided the family can demonstrate that the annual income is not less than the HUD minimum requirement established below:

- a. In the case of a disabled family, the monthly Federal Supplemental Security Income (SSI) benefit for an individual living alone (or paying his or her share of food and housing costs) multiplied by twelve; or
- b. In the case of other families, the Federal minimum wage multiplied by 2,000.

In addition, a family that meets the applicable HUD minimum income requirement described above, but not the LHA minimum income limit of 50% AMI, shall be considered to satisfy the minimum income requirement only if:

- a. The family demonstrates that it has been pre-qualified or pre-approved for financing;
- b. The pre-qualified or pre-approved financing meets any LHA established requirements under 24 CFR 982.632 for financing the purchase of the home (including qualifications of lenders and terms of financing); and
- c. The pre-qualified or pre-approved financing amount is sufficient to purchase housing that meets Housing Quality Standards (HQS) within the LHA's jurisdiction.

Welfare assistance may not be included in the minimum gross annual income above, except for elderly or disabled families. Welfare assistance includes payments from Carrer Source/TANF (Cash Aid for needy families), Supplementary Security Income (SSI) that is subject to an income eligibility test, food stamps, general assistance (GA); or other welfare assistance as specified by HUD.

3. Minimum Employment Requirements

One or more adult members of the household that will hold title to the home must be currently employed and working not less than an average of 30 hours per week and has been continuously employed for at least one year prior to execution of the sales agreement.

Once escrow has closed, employment by the adult member of the household that holds title to the home must continue at least 30 hours per week. Should an event arise that the homeowner loses employment, upon request, a 90 day grace period will be granted for them to regain fulltime employment.

Employment requirements do not apply to elderly or disabled families that otherwise qualify for the HP. A family with a member with disabilities may request an exemption from the work requirements, if needed as a reasonable accommodation for the disabled family member. LHA and HUD minimum income requirements still apply.

The LHA's Executive Director and/or his designee may also consider whether, and to what extent, an employment interruption is considered permissible in satisfying the employment requirement. The Executive Director and/or his designee may also consider successive employment during the one-year period and self-employment in a business.

The family must still meet the overall minimum income requirements outlined in Section 2.

4. Minimum Down Payment Requirements

- a. The family must demonstrate the ability to provide a minimum of three percent (3%) as down payment on the home purchase. Exemptions will be made if the buyer is receiving first time homebuyer's assistance such as any down payment loans or assistance received from Polk County, City of Lakeland, LHA or any other approved entity may be counted towards this down payment requirement.
- b. The buyer must contribute a minimum of \$2,000 dollars from the family's personal resources of their own money towards a down payment on the home.
- c. Family Self-Sufficiency (FSS) participants may use FSS escrow funds towards this requirement.

Families with an Individual Development Account (IDA) may also count these funds towards the minimum down payment. An IDA is considered to be a special family saving account.

5. Other Program Requirements

- a. The family must be receiving HCV rental assistance in Polk County for the most recent 12 consecutive months prior to applying for HCV Homeownership.
- b. The family must have completed an initial HCV lease term and completed the family's first annual recertification in the HCV Program. The family must terminate a current lease agreement in compliance with the lease when transitioning into homeownership.
- c. The family must verify that no family member has previously defaulted on a mortgage loan assisted under the HCV HP.

- d. All families will be required to complete a HUD certified homeownership program through an approved program and provide verification of program completion. Working families
- will be required to open an IDA Program Saving Account so they may earn a interests. The approved homeownership program should, at a minimum, include the following:
 - First Time Home Buyers Information
 - Lenders Language and Procedures
 - Home Safety: Fire and Earthquake
 - Selecting a Realtor and the Right Home
 - Basic Repair & Maintenance
 - Budgeting
 - Balancing Your Checkbook
 - Understanding Credit & Credit Cards
 - Credit Repair
 - Debt Management
 - Financial Planning
 - Borrowing Basics (basic concepts of loans)
- e. The head of household and any adult member that will hold title to the home must successfully complete 8 hours with a HUD approved homeownership and housing counseling program. At a minimum, the counseling will cover the following:
- Home Maintenance
 - Budgeting and money management
 - Credit Counseling
 - Financing
 - Locating a home
 - Fair housing, predatory lending
 - Truth in lending and RESPA
- f. Family members may not owe any debt to the LHA or other Housing Authority. Enterprise Income Verification (EIV) will be run to determine if the family has/had owed any debts to any Housing Authority. If it is found that the family owes money to any Housing Authority, they will be disqualified from utilizing this program.
- g. The family must maintain good tenant standing with its landlord and the LHA. The family must provide a letter from their landlord when entering this program. The letter must certify that the family has paid rent on time for the past 12 months, is current up to date with rent and has kept the rental unit in good repair (i.e., no damage beyond normal wear and tear).
- h. The designated Head of Household must actively participate in the Family Self-Sufficiency (FSS) program with homeownership as one of the established goals.
- i. The family must also:
- Comply with HUD Family Obligations under the HCV Program. If the LHA has mailed out one or more pre-termination appointments within the past 3 years for either failing to provide and/or other program violations, the family will be disqualified from utilizing the homeownership program until such time that this requirement is met;
 - Adhere to the requirements of their lease agreement;
 - Not have outstanding debts to the landlord or to any utility company;
 - Report all household income;
 - Pass the most recent Housing Quality Standards (HQS) inspection with no tenant-caused failure items.

6. Other Program Requirements After Admission

- a. The family must supply any information, certification, release or other documentation required by the LHA. For homeownership families, this requirement specifically includes information about any mortgages and/or defaults, and sale or transfer of the home, and refinance.

- b. The family must comply with the HCV Administrative Plan, Administrative Plan for the Homeownership Program and Obligations of Participant set forth in 24 CFR 982.551. For purposes of interpreting 24 CFR 982.551 in connection with the HP, all references to the “owner” are replaced with “lender.” The family must also comply with any other requirements by the LHA, such as any requirements to attend and complete ongoing and post-purchase homeownership and housing counseling.

B. Eligible Units

HCV Homeownership assistance may be used to purchase homeownership units within the jurisdiction of the LHA that are under construction or already existing at the time the family is approved for homeownership. The family homeownership unit size will be determined using the same formula used in the Housing Choice Voucher rental program.

1. Unit Types

- a. One unit property (single family residence).
- b. A single dwelling unit in a cooperative, condominium or planned use development.
- c. A manufactured home with a permanent foundation, if the family has the right to occupy the same site for a period of at least forty (40) years.
- d. The unit must be seller occupied or vacant for at least ninety (90) days; an exception is where the tenants are purchasing the unit in which they have been residing such as with a lease purchase program.
- e. The unit must pass a HQS inspection.

Depending on the unit size selected by the family, the LHA may approve the purchase of a unit up to one bedroom size larger than the authorized payment standard the family qualifies for and the unit must be deemed affordable (the family’s portion cannot be higher than 50% of gross income).

2. HCV Housing Quality Standards

The homeownership unit must be inspected by the LHA and satisfy the HQS for the HCV Program before HP assistance can begin. The HQS inspection will be completed prior to the independent inspection to prevent the family from the added expense of an inspection in the event the home has major damage or necessary repairs that the seller will not agree to repair and/or the buyer is made aware of the repairs and no longer wishes to purchase the home.

The LHA will conduct a HQS inspection on an annual basis and reserves the right to inspect the unit more often if the subject property receives a public complaint after escrow closes or is visibly in disrepair. If the unit passes HQS inspection at the first visit by LHA staff (i.e., did not fail inspection at a prior visit that year) the unit may be inspected once every other year (biannually).

3. Independent Inspection

The unit must be inspected by a certified independent inspector designated and paid by the family, and pre-approved by the LHA. The inspector must be a member of the Florida Real Estate Inspectors Association, the American Society of Home Inspectors, or the International Conference of Building Officials. This inspection must cover, at a minimum, all major building systems and components including:

- Foundation and structure
- Housing interior and exterior
- Roofing
- Plumbing
- Electrical systems
- Heating systems

LHA must receive and approve a copy of the inspection report before HP assistance will commence. The LHA may disapprove a unit for assistance under the HP because of information obtained through the inspection report, even if the unit passes the HQS inspection. If the LHA or a third party (such as entity providing down payment assistance) calls out additional repairs, the buyer will be required to pay a re-inspection fee to the certified inspector who completed the original home inspection.

4. Other Requirements for Eligible Units

The seller of the home may not be on the HUD list of debarred and suspended contractors, or subject to a limited denial of participation under 24 CFR 24.1.

C. Homeownership Confirmation Letter

Once approved for participation in the HCV HP, the family purchasing the home will be issued a confirmation letter subject to the following requirements:

- The family must execute a statement in which the family agrees to comply with all family obligations under the Homeownership Option.
- The family will be given **90 calendar days** to locate a home to purchase (“Selection Period”). Within two weeks prior to the end of the selection period, if the family has not yet selected a home, the family may submit a written request to the LHA for **one 30 day extension**. The extension request must include the reason for the extension and outline the family’s search efforts. The extension request will be reviewed and verified by the LHA and if an extension is granted, the family will receive a revised confirmation letter with the new Selection Period expiration date. Any extension granted is at the discretion of the LHA and the availability of funds to provide monthly mortgage assistance.
- After a home is chosen during the 90 day Selection Period, the family will be given **90 calendar days to open and close escrow**. The opening of an escrow account must occur no later than the last day of the Selection Period.
- It is the family’s responsibility to find a home that meets the criteria for voucher homeownership assistance.
- The LHA may require families unable to locate a suitable unit during the Selection Period to wait for a period of one (1) year to re-apply for the HP.
- The family must report its progress towards locating and purchasing a unit if requested by the LHA.

If the family is unable to locate an acceptable unit for purchase during the Selection Period, the LHA may, at its discretion, allow the family to remain leased up under the HCV rental voucher.

If the family submits a purchase contract to the LHA that is not approved due to reasons other than the family’s lack of compliance, the family may request an extension using the process

outlined above in this paragraph relating to the Selection Period.

D. Purchase Agreement

Prior to execution of the offer to purchase, or the purchase agreement, the financing terms must be provided by the family to the LHA for approval.

The purchase agreement must include the following:

- Specify the price and other terms of the sale by the seller to the purchaser;
- Specify the purchaser will arrange for a certified inspection of the unit by an independent certified inspector selected by the purchaser;
- State the purchaser is not obligated to purchase the unit unless such inspections are satisfactory to both the LHA and purchaser;
- State or confirm the purchaser is not obligated to pay for any necessary repairs;
- State or confirm the purchaser is not obligated to purchase if the mortgage financing terms, or any other terms, are not approved by the LHA; and
- Contain a seller certification from the LHA that the seller has not been debarred, suspended, or subject to a limited denial of participation in accordance with 24 CFR 24.1.

E. Affordability

The purchase price of the home must be affordable to the family, as determined by the LHA and the lender. The price shall be considered affordable if the monthly homeownership expenses payable by the family do not exceed fifty percent (50%) of the family's total monthly gross income.

F. Financing

1. The family shall allow the LHA to review the terms of the mortgage secured to purchase the property before close of the escrow account. The LHA may disapprove proposed financing, refinancing or other debt, in its reasonable discretion, if the LHA determines that the debt is unaffordable to the family or if the LHA determines that the lender or the loan terms do not meet LHA or HUD qualifications. The family must locate and qualify for a mortgage that satisfies the following minimum requirements:
 - a. The mortgage must be determined to be affordable by the LHA. The LHA may take into account expenses such as interest, taxes and insurance when determining affordability. The family's portion of the monthly homeownership expenses may not exceed (50%) of the family's total monthly gross income.
 - b. Short-term mortgages with large final "balloon payment" will not be allowed.
 - c. Interest only mortgages will not be allowed.
 - d. Only fully amortized, fixed rate mortgages will be allowed.
 - e. The family may not obtain private first mortgage financing from a family member or any other private source.
 - f. The mortgage must be provided, insured, or guaranteed by the state or federal government and comply with secondary mortgage market underwriting requirements.

2. Refinancing

In addition to the requirements stated above in Section F,1. Financing, the family shall also satisfy the following requirements in connection with a request for a refinance or home equity loan:

- a. The refinanced loan cannot exceed the original purchase price of the home.
- b. There must be a minimum of a 1% reduction in the interest rate.
- c. If the family has additional loans on the home such as a second and/or third mortgage, they are required to contact the lender to review the subordination guidelines. The family must submit a written documentation from that lender that states what the subordination guidelines are to the LHA upon submission of the refinancing documents.
- d. The family does have the option to pay the second and/or the third loan off in full upon refinancing. This pay off option must be specified in the refinance documents.
- e. Provide principal, interest, taxes and insurance (PITI) and mortgage insurance/private mortgage insurance (MI/PMI), if applicable, on initial mortgage debt and any refinancing of such debt.
- f. Real estate taxes may not exceed 2%.
- g. A Home Equity loan may be considered by the LHA as long as the funds are used only for major home repairs. The amount of the home equity loan along with the first loan cannot exceed the original purchase price of the home. In addition the family's portion of both loans cannot exceed 50% of the family's total monthly gross income. The LHA must ensure that this will be a third loan and will not interfere with the first and/or second loan(s).

G. Calculation of Homeownership Assistance Payment

Calculation of income for the purpose of determining income eligibility for admission to the program and/or determining the family's total tenant payment will be conducted under the guidelines for the HCV rental assistance program, except as otherwise noted in this section.

1. Occupancy of Home

The HAP will only be paid while the family resides in the home. If the family moves out of the home, the LHA will discontinue payment of the HAP commencing with the month after the family moves out.

- a. Amount of monthly homeownership assistance payment. While the family is residing in the home, the LHA shall pay a monthly homeownership assistance payment on behalf of the family that is equal to the lower of the payment standard minus the total tenant payment; or the family's monthly homeownership expenses minus the total tenant payment.
- b. Initial Payment Standard. The initial payment standard for a family is the lower of the payment standard for the family unit size (Voucher size); or the payment standard for the size of the home.
- c. Payment Standard for subsequent reexaminations. Reexaminations (interims and annual reexaminations) will use a payment standard that is the greater of the HCV payment standard as determined in accordance with the initial payment standard at the commencement of homeownership assistance; or the payment standard in effect at the time of the reexamination as determined using the requirements of Section G (1) (b) (Initial Payment Standard). At no time will the LHA use a payment standard less than the initial payment standard at the close of escrow.
- d. The LHA will use the same payment standard schedule, payment standard

- amounts, and subsidy standards for the HP as for the rental voucher program.
- e. Exception rent areas. If the home is located in an exception payment standard area, the LHA must use the appropriate payment standard for the exception payment standard area.
 - f. Affordability of housing costs. Total monthly homeownership expenses payable by the family, as defined in (G)(1)(g) below, must be less than (50%) of the family's total gross income.
 - g. Homeownership expenses. The LHA will use the following expenses to determine the total homeownership expense for calculation of the HAP:
 - Principal, interest, taxes and insurance (PITI) and mortgage insurance/private mortgage insurance (Mi/PMI), if applicable on initial mortgage debt and any refinancing of such debt;
 - Real estate taxes may not exceed 2%; and
 - Utility allowance for the home as determined by the LHA.
 - h. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, provided LHA has first determined that allowance of such costs as homeownership expenses are needed as a reasonable accommodation for the disabled family.

2. Cooperative and Condominiums

For cooperative members only (owners of condos) the following cooperative charges will also be used toward the homeownership expense:

- a. Charges included in the cooperative occupancy agreement including payment for real estate taxes and public assessments on the home; and
- b. Cooperative or condominium operating charges or maintenance fees assessed by the condominium or cooperative homeowner association.

3. HAP Payment

- a. The LHA will pay the HAP according to the terms established in the agreement the LHA and the lender have entered into. If the assistance payment exceeds the amount due to the lender, the excess will be paid directly to the family.
- b. The LHA will provide the lender with notice of the amount of the HAP and amount of the family's portion of the total homeownership expenses prior to close of escrow.
- c. Procedure for termination of homeownership assistance.
 - The family shall be entitled to the same termination notice and informal hearing procedures set forth in the Administrative Plan for participants in the HCV rental assistance program.
- d. Automatic termination of HAP.
 - Homeownership assistance for a family terminates automatically 180 calendar days after the last HAP paid on behalf of the family. The LHA has the discretion to grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family.

4. Income Changes

a. Changes in income must be reported in writing within 10 days of the occurrence. Changes for income *decreases* will be processed if they are anticipated to continue for sixty (60) or more days and is a monthly decrease of \$100 or more. Changes for income *increases* will be processed if the increase of income is \$100 monthly or more. Once these changes have been verified, the LHA will process an interim to be applied, the first of the following month the change was reported for decreases and the first of the next month for increases (giving a 30-day notice of the increase).

H. Maximum Term of Homeownership Assistance

The time limits below apply to all family members having an ownership interest in the unit during the time that homeownership payments are made and the spouse of any member of the household who has an ownership interest in the unit during the time that homeownership payment are made. Except in the case of a family that qualifies as an elderly or disabled family, all families, including families that become elderly during the term of the homeownership assistance, are subject to the following maximum terms:

- Initial mortgage term of twenty (20) years or longer. Pursuant to 24 CFR 982.634 (Homeownership option: Maximum Term of Homeownership assistance) the maximum term of homeownership assistance will be fifteen (15) years. In all other cases, the maximum term of homeownership assistance will be ten (10) years.

If, during the course of homeownership assistance, the family ceases to qualify as elderly or disabled, the maximum term as defined in 24 CFR 982.634(c) will become applicable from the date homeownership assistance commenced. The LHA will provide a family at least six (6) months of homeownership assistance after the maximum term becomes applicable provided the family is otherwise eligible to receive homeownership assistance in accordance with 24 CFR 982.634.

The initial maximum term limit applies if the family receives assistance for more than one home purchase, even if received from another housing authority.

In accordance with PIH 2012-3 (HA), issued January 27, 2012, the value of the home will not be counted as an asset for the first 10 years after the purchase date of the home. After 10 years the value will be counted as an asset. The methodology the LHA will use is as follows: $\text{Equity} - \text{Expenses to Convert to Cash} = \text{Net Cash Value}$ or incorporating the equity formula from above; $\text{Market Value} - \text{Loan (Mortgage)} - \text{Expenses to Convert to Cash} = \text{Net Cash Value}$. If the Net Cash Value is a negative number, the LHA should not make an adjustment to new family assets for this asset.

I. Portability

The LHA will permit portability of the homeownership assistance (the LHA's portion) to another jurisdiction, provided the receiving jurisdiction operates a similar homeownership program for which the applicant qualifies and for which the receiving PHA is accepting new homeownership families.

1. Incoming Portable Families

- a. May purchase a unit within the jurisdiction of the LHA, provided the LHA is accepting new homeownership families at the time of the purchase.
- b. Must be under HCV rental assistance in Riverside County for the most recent 12 consecutive months prior to application for HCV Homeownership.
- c. Must meet the homebuyer education, counseling, and all other HP requirements of the LHA.
- d. Must be certified by initiating Housing Authority that the family is in good standing with that Housing Authority and landlord.

The LHA must promptly notify the initial Housing Authority if the family has purchased an eligible unit under the program, or if the family is unable to purchase a home within the maximum time established by the LHA.

2. Outgoing Portable Families

Outgoing portable families shall adhere to the following:

- a. Purchase a unit within the receiving jurisdiction, provided they operate a homeownership program and they are accepting new homeownership families at the time of the purchase.
- b. Shall meet the education, counseling, and all other HP requirements of the receiving Housing Authority.
- c. Shall be certified by the initiating LHA that the family is in good standing with the Housing Authority and landlord.

The LHA must notify the Housing Authority, if the family has purchased an eligible unit under the program, or if the family is unable to purchase a home within the maximum time established by the Housing Authority.

J. Move with Continued Tenant-Based Assistance

A family receiving LHA homeownership assistance may purchase and move to a new unit with continued voucher homeownership assistance as long as no family member owns any title or other interest in the prior home. A family receiving homeownership assistance may move to a new unit with continued voucher homeownership assistance no more than once every five (5) years and the total of such assistance terms is subject to the maximum term described in this Section J.

1. Purchase of a new unit

A family receiving homeownership assistance may purchase and move to a new unit with continued assistance, provided that the family fulfills all requirements of the HP at the time of the purchase of the new unit. The following applies to a family purchasing a new unit under the HP:

- a. The family will not be eligible to move with continued assistance for a period of five (5) years after the initial purchase.
- b. The LHA may, at its discretion, require the family to complete a new housing counseling program or receive additional counseling prior to close of the escrow account.
- c. The requirement that the family must be a first-time homebuyer is not applicable.
- d. The LHA may deny permission to move with continued assistance in the case of lack of funding or if the LHA has denied or terminated assistance to the family under section K below.

2. Sale of Original HP Unit and Return to Tenant-Based Rental Assistance

The LHA may, at its discretion, allow a family to return to tenant-based rental assistance. The following applies to a family returning to tenant-based rental assistance:

- a. The LHA may deny permission to move with continued assistance in the case of lack of funding or if the LHA has denied or terminated assistance to the family as defined under Section K of this plan.
- b. The LHA will not commence continued tenant-based assistance for occupancy of a rental unit so long as any family member owns any title or other interest in the home previously assisted through the HP. In addition, eighteen (18) months must have passed since the family's receipt of the down-payment assistance grant.

K. Denial or Termination of Assistance

The LHA shall deny or terminate homeownership assistance for the family in the event any of the following occurs:

- Failure to report all household income;
- Failure to comply with the program requirements of the LHA HCV HP;
- Failure to comply with any HUD defined family obligations;
- Failure to comply with the requirements LHA Policy on Prohibited Criminal Activity; or
- The family defaults on the mortgage(s).

L. Recapture

The LHA will not recapture any Homeownership Voucher payments unless the family or any member of its household commits an act of fraud or misrepresentation of material facts in order to obtain a benefit. The HCV HP recapture provision does not apply to any other program funds that may be used in the transaction.

M. Program Size and Waiver or Modification of Homeownership Policies

The Executive Director (ED) of the LHA, or his designee, shall have the discretion to waive or modify any provision of the Homeownership Program or policies not governed by statute or regulation for good cause or to comply with changes in HUD regulations or directives. The ED, or his designee, may limit homeownership assistance to families pursuant to 24 CFR 982.626 (b).

For fiscal year 2020-2023, the LHA has established a homeownership assistance limit of no more than 120 families.

Housing Authority City of Lakeland Limited English Proficiency (LEP) Plan

2023

It is the policy of Housing Authority City of Lakeland (LHA) to ensure that persons with Limited English Proficiency (LEP) are not discriminated against nor denied meaningful access to and participation in the programs and services provided by the Housing Authority. In order to ensure meaningful access and participation for LEP persons, LHA will notify such persons that language services are available to them at no cost and will take reasonable steps to see that language services are provided according to the provisions of LHA's Plan as described below.

The LEP Plan and Policies that follow will apply to all of Housing Authority City of Lakeland's programs, services and facilities.

It is the intent of Housing Authority City of Lakeland, in providing language services to LEP persons, to achieve a balance that ensures meaningful access to programs and services while not incurring undue burdens on LHA resources.

LHA has designated Carlos Pizarro as the LEP Coordinator. This employee will provide oversight for the implementation of the LEP Plan and Policies, coordinate and facilitate delivery of LEP language services, ensure that staff receives appropriate training on LEP Policies and Procedures, and direct the ongoing monitoring and periodic assessment of the LEP Plan and Policy's effectiveness.

Definitions

Limited English Proficiency Person. Any person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. Such person or persons will be entitled to language assistance at no cost to themselves with respect to a particular type of service, benefit, or encounter.

Vital Document. Any document that contains information that is critical for obtaining or maintaining the services or benefits that are supported by Federal funds, or that are required by law. Such documents may include, but are not limited to, applications, consent forms, notices of participant rights and responsibilities, disciplinary notices, letters or notices that require a response from the participant or beneficiary, legal notices, and notices advising LEP persons of the availability of free language services

Interpretation. The act of listening to spoken words in one language (the source) or orally translating it into another language (the target).

Translation. The replacement of a written text from one language into an equivalent written text in another language. It is noted that some LEP persons cannot read in their own language and back up oral interpretation services may be needed for written documents.

Four-Factor Assessment. This is an assessment tool used by the Recipient of federal funding to determine the extent of its obligation to provide LEP services. These four factors are: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided the program to people's lives; and (4) the resources available to the grantee / recipient and costs.

Who is Covered? HUD's regulations, 24CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development – Effectuation of Title VI of the Civil Rights Act of 1964," requires all recipients of federal financing assistance from HUD to provide meaningful access to LEP persons. Title VI of the Civil Right Act of 1964 prohibits discrimination on the basis of race, color or national origin. Because language, like culture, is so closely linked to national origin, HUD's final LEP guidance points out that "failure to ensure that LEP persons can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination."

Pursuant to Executive Order 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the LEP Guidance of the Federal Register (FR-4878-N-01) are to additionally apply to programs and activities of federal agencies, including HUD. Federal financial assistance includes grants, training, and use of equipment, donations of surplus property, and other assistance.

Federal assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should: (1) conduct the four-factor assessment; (2) develop a language access plan (LAP); and provide appropriate language assistance. Recipients of HUD assistance include Public Housing Authorities.

Coverage under Title VI, Executive Order 13166, and HUD's regulations extends to a recipient's entire program or activity, (i.e., to all parts of a recipient's operations). This is true – even if only one part of the recipient receives the federal assistance.

Identification of LEP Persons Who Need Language Services Assistance

The LHA will use the following methodology and data sources to identify and determine the number of LEP persons currently using the Housing Authority's services, the number of LEP persons in the Housing Authority's area of operations who may be eligible for programs and services and the particular languages used by both parties.

1. The LHA will use various methods to identify LEP persons with whom they have contact.

These will include:

- Current and past experiences with LEP persons encountered by staff. The number and type of such encounters will be periodically tabulated and analyzed to determine the breadth and scope of the language services required. In this analysis, consideration will be given to minority language populations that are eligible but may have been underserved because of existing language barriers. To facilitate these encounters, notices will be posted in the lobby of the main office. The posted notice will be in commonly encountered languages and should encourage LEP persons needing language assistance to self-identify.
- Self-Identification through the application form. The Housing Authority will document within the application form that the applicant has been informed of their right to language services at no cost, identify their primary language, and whether or not they would like an interpreter or prefer to receive documents translated into their primary language.
- The LHA is located in Polk County, FL. Based on data maintained by Polk County 21.1% of the people in Polk County, FL speak a non-English language. Spanish is the most common foreign language in Polk County and within the City of Lakeland.
- The LHA will continue to review data analyzed by Polk County. Data will also be reviewed from the Modern Language Association (www.mla.org) regarding languages spoken in Polk County and the City of Lakeland as well as the ability to speak English “well” or “very well” as self-identified by speakers of various languages within the County. The Housing Authority may also utilize the Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance available at www.lep.gov/selfassesstool.htm.

As part of the implementation of its LEP Plan the LHA will utilize information provided by applicants and current program participants on application and review documents and recorded in LHA electronic records to determine the types of languages used and the levels of proficiency with English for each household. In addition, LHA will utilize data obtained during staff encounters at initial screening of applicants and at each annual review.

This information will be reviewed periodically to ensure that the LEP Plan addresses the language needs of persons served by the LHA.

Frequency of Contact with LEP Persons

The LHA will also provide language services in the conduct of its outreach efforts, which are intended to make the general public aware of its programs and services. In this manner, LEP persons who are a part of the population in the Housing Authority’s area of operations will have an equal opportunity to learn about the Housing Authority’s programs and services and to access and participate in them.

Nature and Importance of the Program or Services

The LHA recognizes that, within the range of programs and services it provides, some programs and services are more important than others. While it is LHA's intent to provide meaningful access to all participants and eligible persons, the availability of resources may limit the provision of language services in some instances.

Activities such as outreach intake forms, leases, rules of occupancy, legal actions, life and safety notes, and the like have a high priority. Information about and an understanding of these activities such as recreation programs, social activities, optional meetings, and related areas are of a lesser importance and hence a lower priority. The LHA will develop a listing of all activities related to its programs and services and a matrix showing the relative importance of each. Based upon this analysis, LHA will determine how language services to LEP persons will be delivered for each activity.

Types of Language Services to Be Provided

Based upon the number or proportion of LEP persons of various language groups served or encountered in the eligible population, the LHA will provide language services as indicated.

The LHA will provide language services to LEP persons by a variety of methods based upon the relative numbers of such persons and the frequency of contacts or anticipated contacts. Reasonable steps will be taken to accomplish this, but at a point at which costs approach or exceed the benefits, alternative methods of delivery of language services will be evaluated and appropriate changes made.

Based upon the number or proportion of LEP persons of various language groups served or encountered in the eligible population the LHA will provide language services as indicated below:

Provision of Written Language	Language Groups	Determination
Translate Vital Documents	Spanish	There is more than 5% of the eligible population or beneficiaries within the Housing Authority's jurisdiction.
Translated Written Notice of Right to Receive Free Oral Interpretation of Documents	Spanish	Based upon the Housing Authority's past experience with LEP persons encountered by LHA staff, this is the most common language for which interpretation is requested.
No Written Translation Required	All others	While no written translation is required for other languages under the LEP Plan, the Housing Authority will continue its practice of providing oral interpretation when requested by applicants / participants of its program

Procurement of Interpretation and Translation Services for LEP Persons

The following methods of providing interpretation and translation services will be considered and used based upon the assessment of need for the Housing Authority:

1. Contracting with qualified interpreters and translators, either individually or through an organization which provides such persons when other Housing Authority employees are not available or not skilled (when accuracy and details are important or critical).
2. Centralizing language services and / or sharing language services with other Housing Authorities if / when available (useful to minimize costs).
3. Using telephone interpreter services (useful when prompt delivery of interpretation services is required.)
4. Pooling resources and / or standardization of documents and forms (useful to minimize costs).
5. Use of and / or hiring or training bilingual staff who handle the majority of the verbal and written translation duties for the Housing Authority (essential in the daily operations).
6. Using family members or friends (useful when language service needs are least important or informal).

The LHA will explore the most cost-effective means of delivering competent language services before limiting services due to resource limitations or concerns. In the process of deciding which services will be provided, the Housing Authority will thoroughly document the process used in arriving at the determination of which services are to be provided to which groups. This documentation will be maintained in Housing Authority records to demonstrate compliance with the LEP Guidance issued by HUD.

Quality and Competency of Language Services

The Housing Authority will make every reasonable effort to assure that the language services it provides to LEP persons are of the highest quality and that the competency of interpreters and translators is appropriate to the situation. This would, generally, be used outside of the use of internal bilingual employees.

1. Interpreters (outside the use of internal bilingual employees). Oral interpretation of encounters, interviews, meetings and the like require a certain level of competency and professionalism on the part of the interpreter. These characteristics do not necessarily exist in a person who is simply bilingual. Likewise, formal certification, while helpful, may not always be required. Often the importance of the encounter or the consequences will direct the level of professionalism needed. For example, a grievance hearing or court hearing regarding a lease termination may require an interpreter while a meeting at a resident's home about a minor neighborhood complaint may not.

When using an interpreter, the Housing Authority will use the following general criteria to ensure effective communications with LEP persons:

- a. Demonstrated proficiency in and ability to communicate information accurately in both English and in the other language, and able to identify and employ the appropriate mode of interpreting (consecutive, simultaneous, summarization, or sight translation).
- b. Knowledge in both languages of any specialized terms or concepts peculiar to the Housing Authority's program or services and of any particularized vocabulary and phraseology used by the LEP person.
- c. An understanding of and ability to follow confidentiality and impartiality rules to the same extent that the Housing Authority employee for whom they are interpreting or to the extent that their position requires or both.
- d. Understanding of and adherence to their role as interpreter without deviating into a role as a counselor, legal advisor, or other role.
- e. Awareness of regionalisms (dialects) used by the LEP persons for whom they are interpreting.
- f. Certification of interpreters' skills and abilities when individual rights depend upon precise interpretation.

When interpretation is necessary and reasonable it will be provided in a timely manner and in an appropriate place so as to avoid the effective denial of a benefit or service. The importance of the benefit or service to meaningful access to programs and services will dictate the urgency of providing the language service may be reasonably delayed.

- 2. Translators (outside the use of internal bilingual employees). When selecting translators, the list of criteria applied to determine competency and professionalism for interpreters above will be applied to the extent that those criteria are appropriate. Translation skills can be very different from those of interpretation. When vital documents are involved, the Housing Authority will use professional translators or translation associations.

Documents Used by the Housing Authority

The LHA will conduct an initial review of its written documents that are generally available to and used by the general public, applicants and residents for the purpose of assessing the importance of those documents to its clientele, including LEP persons. This analysis will be based upon HUD's "Four Factor Assessment" that is found in the notice regarding guidance on LEP persons. The four factors are:

- 1) The number or proportion of LEP persons encountered or eligible to be served
- 2) The frequency of contact
- 3) The nature of importance of the program or activity
- 4) The resources available to the LHA and the costs.

Based upon this analysis, a determination will be made as which documents will be translated and into

which languages. This may range from word for word translation of legal notices to the simple inclusion on other less important documents of a notice in various languages that translations or interpretations may be available upon reasonable request.

At a minimum, LHA will provide written translation of vital documents for LEP language groups that constitute 5% or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be encountered by the Housing Authority.

Translation of vital documents into other languages that do not meet this criterion may be provided orally if, and when, needed. If there are fewer than 50 persons in a language group that meets the 5% level, the LHA will not translate documents, but will instead provide a written notice in the appropriate language of the LEP group of the right to receive competent oral interpretation of the written materials free of cost.

Type and Frequency of Notice to LEP Persons

The LHA will provide appropriate notice to LEP persons of the availability of free language services that ensure meaningful access to programs and services provided by the Housing Authority. Based upon the results of research into the language groups that are encountered in the LHA's area of operations, notices in those appropriate languages informing LEP persons and groups will be posted in common areas, offices and anywhere that applications are taken. These notices will explain how to receive language services.

Notices will be distributed to grass roots and other community-based organizations informing LEP persons of the Housing Authority's programs and services and of the availability of free language services needed.

Telephone answering messages and voice mail menus will include brief notices in the most commonly used languages.

Training of Staff Persons

The LHA will provide training to its staff in its LEP Plan and Policies. A determination of the frequency of staff encounters with LEP persons will dictate the level of detail of this training. Staff having the greatest contact will be trained to effectively implement the Plan and Policies through the use of standardized procedures. Those staff having the least amount of contact with LEP persons will, at a minimum, be trained to be fully aware of the Plan and Policies so that they may reinforce its importance and ensure implementation by other staff.

Monitoring, Compliance, Assessing Performance and Revisions

The LHA will monitor implementation of the LEP Plan and Policies on an ongoing basis, making revisions to policies and procedures as may be required periodically. The LHA will also review on a periodic basis the overall effectiveness of its LEP Plan and Policy. This review will consider information from the following sources and criteria as well as other factors as may be appropriate:

1. Changes in demographics, including new language groups and changes in the proportion of existing language groups, types of services, and other needs.
2. Frequency of encounters with LEP persons.
3. Whether existing language services are meeting needs of LEP persons.
4. Availability of new resources, including technology.
5. Whether identified sources for assistance are still available and viable.
6. How well staff understand and have implemented the LEP Plan and Policies.
7. Feedback from the community at large and from minority language groups and persons.

Bases upon findings of the periodic review, the LHA will revise the LEP Plan and Policies to ensure its effectiveness in meeting the access and participation needs of LEP groups and persons.

Staff will document revisions to the LEP Plan and Policies as they are necessary and the reasons therefore.

Consistent with federal law, HUD and LHA policies “ no person will be discriminated against on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual’s income is derived from any public assistance program. This policy will continue to be communicated in English and languages appropriate to residents, applicants, staff and the public.

Maintenance Plan and Policy

1. Overview

This Policy covers the requirements and expectations for the general maintenance of all LHA and WL MGMT properties. Good planning and organization are essential to the proper care and upkeep of the property.

2. Personnel and Staffing Plan

In accordance with the annual budget, each property is to be staffed at an appropriate level.

This staffing plan will differ from one property to the next based on differing circumstances. It is the responsibility of the Housing Manager to assure that this staffing plan meets the needs of the site. In most cases, a property's staff will consist of one Maintenance Team * and several other technicians or Porters. In terms of reporting relationships, the Housing Manager supervises the Maintenance Team *.

It is expected that the staffing plan be adequate for the routine needs of the property. It is also expected that the maintenance staff shall be responsible for carrying out all functions provided under their job descriptions. However, there may be times that the Housing Manager will need to supplement existing staff due to:

- seasonal work;
- sudden or unanticipated work;
- work requiring skilled trades.

To meet seasonal or unplanned work, the Housing Manager (With the approval of the Executive Director and/or Vice-President of Housing) can hire temporary staff, contract labor, or use overtime hours and regular staff, given the circumstances and in keeping with the property's operating budget. It is the responsibility of the Housing Manager to determine when to supplement staff to meet the needs of the site. Depending upon the situation, it can be more economical to hire an outside contractor.

All Maintenance Staffs are required to take a written test as part of the hiring process. Applicant testing for the rest of the maintenance staff is left to the discretion of the Housing Manager, Maintenance Team *, and Executive Director and/or the VP of Housing.

The maintenance staff should be general mechanics, trained in all phases of maintenance and repair. To be most effective, the staff should be able to go through every apartment, service facility, etc., with a checklist and perform all preventive maintenance work necessary. If the work is beyond the scope of preventive maintenance, needed repairs should be reported for scheduling at a later date. Each staff member, when possible, will work independently of the other, as it is rarely necessary to have more than one person working on a typical project. Most Agency properties will be staffed with a full Maintenance Team * who has mechanical aptitude and previous experience. The Housing Manager will provide training for the Maintenance Team * in the project's operating statements/budgets and will meet daily with the Maintenance Staff to review pending work orders, maintenance projects, and rent ready unit availability.

Job descriptions for all maintenance staff are available on the shared H: drive.

The Housing Manager is responsible for the training and supervision of all maintenance staff. Each staff member should be trained, if possible, to do every routine or scheduled maintenance task at the property. After the training period has been completed, the Maintenance Team * determines which employees do certain jobs most effectively and assign jobs according to performance. In some instances, specific licensing or certification will require third party training. WL MGMT encourages

maintenance personnel to attend training classes or seminars sponsored by approved vendors or applicable trade groups.

In addition to maintenance and general operations training, each employee should be well indoctrinated in maintenance record keeping, cost control, and workplace safety.

3. Customer Relations and Appearance

The importance of public relations training for the Housing Manager and maintenance staff cannot be overlooked. It is important to understand the relationship between maintenance personnel and property residents. Maintenance personnel provide a service to our customers – the property residents.

Maintenance personnel can be the best public relations members of the site staff since, once a resident has moved in, most of their contact is often with the maintenance personnel.

Most residents care about their home and the surrounding environment. Therefore, the attitude of the maintenance staff toward the residents and the manner in which they respond to service requests is very important. Remember, the maintenance staff's job is to serve the resident, as well as the owner, by properly maintaining the property. Maintenance personnel should look upon service requests as the source of their livelihood, and not as a burden. It is, after all, one of the services for which the resident is paying rent.

Appearance of the maintenance staff is also important, as a clean and professional appearance conveys to residents, guests, and vendors that site personnel will perform maintenance tasks in a professional manner.

Acceptable attire and appearance standards are covered in the Employee Handbook.

The standard to which the property is maintained as well as the staff's attitude towards residents is both a direct reflection of the Agency's philosophy as well as their own pride in the job that they perform. Keep in mind the following:

- Never promise anything to a resident that cannot be delivered or is beyond staff's authority to deliver.
- If a promise is made, be sure to keep it.
- If unable to comply with a promise or if an appointment with a resident is missed, it is imperative that the reason be explained to the resident as promptly as possible.
- All residents are to be treated with courtesy.
- Answer all service requests with prompt attention to the problem.
- Perform the work needed and leave the resident promptly. Be polite, but do not linger, socialize, or look for more problems. If the resident brings up additional maintenance issues, attempt to take care of them only if they are minor and you have needed tools and/or supplies in your possession. Otherwise ask the resident to report the problem to the office so that a new service request can be made.
- Wipe your feet or consider wearing disposable "booties" when working in occupied apartments.
- Wear coveralls and latex gloves while painting or performing other potentially messy jobs. If you are pulled away to do another job, you will look much more presentable and professional.
- Remove all old parts, wrapping materials, etc., when a project is completed. Never use the resident's trash can.

4. Work Order Procedures

All maintenance work, exclusive of general cleaning and porter service, shall be captured on a work order, as described below.

The prompt, courteous and effective handling of work orders is critical to the success of WL MGMT apartment communities. After moving in, the majority of contact with site staff involves interaction with maintenance personnel during the work order process. Therefore, it is essential to make the work order process a positive experience and to handle all maintenance requests similarly – regardless of

their magnitude. Resetting the breaker on a garbage disposal or putting a closet door back on track may seem trivial to you but may be very important to the resident.

Maintenance requests should all be addressed and, if possible, completed within 24 hours of being submitted. If you are unable to address a maintenance request within 24 hours, the resident must be called and given an update as to when the request will be addressed. If a work order request cannot be completed during the initial visit (due to unavailable parts, required specialty services, etc.), arrangements to complete the work order must be made as soon as possible and the resident kept informed of any progress.

Residents are informed at move-in, and throughout their occupancy, that ALL maintenance requests must be made to **management office personnel**. The purpose for handling work orders in this manner is to eliminate interruptions created by answering calls for service requests, to provide a control to ensure that all maintenance work services are handled, and to ensure that adequate records are kept for all repairs. If a resident asks you to perform a repair that has not been reported to the site office, politely ask them to call the work order into the office at their earliest convenience. Only legal residents are allowed to request work to be done in an apartment.

Once the office staff member has received a call for service, they will attempt to obtain as much information as possible about the problem so a work order can be prepared. The person talking the work order will make sure to complete the following:

- Who wrote the work order? This is important if the maintenance staff has any questions about the work order.
- When was the work order taken? This is important in tracking how long it takes to handle work order requests.
- The apartment number and name of the resident that called in the order.
- Get a phone number. This is very important if the maintenance department has questions about the work order or if the need to change the scheduled appointment. (This is a good time to make sure that the office has the correct resident contact information.)
- Remember, the work order “permission to enter” is good for 48 hours. If more than 48 hours pass in completing the repair, the resident must be contacted to obtain a new “permission to enter.”

Upon initiating the work request, the maintenance staff will fill out the following information on the work order:

- Complete the “unit entry” section. Make sure the date, time entered, and time departed sections are accurately filled out.
- Who performed the work.
- What is the status of the repair and, if the repair is not complete, when will it be completed? If additional work is required, office personnel will need to contact the resident for permission to reenter the unit.
- Once the work is satisfactorily completed, fill out the appropriate section. Include cost for labor and materials, especially if cost is to be billed back to the resident.
- Make detailed notes of work performed and materials used. If work is not completed, make note of why. Also, detail any needed parts or supplies.
- In all cases, when arriving at an apartment to initiate a work order, a door tag must be hung on the outside of the unit door. When leaving the apartment, whether the work order has been completed or not, the outer side of the door tags must be completed and hung on the inside of the entry door. Completing the door tag is especially important in cases where a return visit is necessary since the paperwork order is removed and the resident has no idea what work was performed or the status of work remaining.

Work Order Forms

Work orders are printed on two copies forms:

- The original copy from YARDI is the control copy. It remains with the Housing Manager or clerk as the work order is assigned to maintenance, then is filed when completed. Make sure the resident signs the original copy.

The second copy is left with the resident after the work is done (or left in the unit if the resident is not at home).

Work Order Intake

Resident maintenance requests shall only be taken in the management office or the Central WL MGMT (COCC) office, by phone or in person.

Requests should never be taken outside the office or in the field. Instead, residents should be directed to call or visit the office so they may receive a work order number. After entering the work request into the system, the resident will be given a work order number for reference purposes.

Personnel receiving work order requests for maintenance should strive to isolate the exact nature and extent of the work required. Fully understanding the nature and source of the complaint will greatly assist the maintenance staff in, for example, determining which tools should be taken to the unit.

Work Priorities

The Maintenance Team * must work with the Housing Manager to determine work order priority. Prioritizing work orders based on time received is not always the most efficient or effective way to proceed.

Work orders shall be prioritized according to the following:

1. **Emergencies.** Refers to a response to conditions that pose an immediate threat to life, facilities, health and/or safety of residents and/or Agency property. Emergency conditions must be responded to immediately (Within two hours) and corrected or abated within 24 hours. Samples of emergency work orders include: fire of any nature; gas leaks; oil spills; missing or inoperable smoke detectors; broken water supply line(s); electrical fault with visible sparks or overheating; dangerous structural hazard; complete loss of electrical power; loss of air conditioning in elderly buildings; sewer back up; main entrance door release not operable (high-rise); elevators not operating properly; flooding; clogged toilet (units with one full bathroom); and entrance door not operable.

In the rare situation when an emergency cannot be repaired in 24 hours, it can be abated by moving the resident out of the unit temporarily.

2. **Urgent.** Urgent work orders include items that, if not repaired, pose potential threat to life, facilities, health and/or safety of residents. Urgent items must be corrected/abated within 24 hours of notification. Samples include refrigerator not working or broken window.

3. **Unit Preparation.** Work having to do with making a unit ready for occupancy.

4. **Routine.** Most of the work that is not classified as emergency, urgent, or preventive. Includes: repair screen door, paint occupied unit, change air conditioning filter, general maintenance in unit, unscheduled PM.

5. **Preventive Maintenance (PM).** This includes all work conducted as part of the property's annual PM program.

6. **Other.** Work orders that do not fall into the five noted categories above.

Work orders may be generated by the same source (see below) but have different priorities. For example, based on a unit inspection, work orders may be created for a missing tile (routine) as well as replacement of the smoke detector (emergency). It is important that work orders are prioritized properly for HUD or Florida Housing Corporation reporting purposes since WL MGMT is measured on their timeliness in responding to different priority of work orders.

Source of Work Order

Work orders shall be classified according to their source, as follows:

1. **On Demand (Resident Requested):** This is work that is requested by the resident.
2. **UPCS Inspection:** This is work that is the result of UPCS inspections.
3. **Preventive Maintenance:** This is work that is the result of PM inspections.
4. **Other:** This is work that is generated by sources other than the three noted above.

Tracking work orders by their source is critically important for both HUD reporting purposes and for future planning.

Assignment

Unless otherwise directed by the Housing Manager, the Maintenance Team * is responsible for assigning and completing work orders. The Maintenance Team * should periodically retrieve the work orders from the management office and assign them to the maintenance staff in accordance with the priorities established and the skills of the respective staff. When assigning the work, the Maintenance Team * shall make sure that the worker is provided with the anticipated tools/materials and also that the worker has access to the units. If the worker must make more than one visit, the work order remains open until the work is completed.

Also, if the work is beyond the capabilities of the on-site staff, the Maintenance Team * is responsible for assuring that the work is done by a qualified crew, if any or under contract to a qualified vendor. The work order remains open until all work is completed.

Completion

Upon arriving at a resident's apartment, the worker shall knock on the door to see if the resident is home.

If the resident is home, the worker shall exchange greetings and identify him/herself as an Agency maintenance employee and show the employee badge. Then, the worker shall ask permission to enter. If the resident is not home or does not answer the door (and there is either an emergency or there has been prior permission to enter), maintenance staff shall enter the apartment by (1) knocking on the front door and calling loudly and identifying himself as a maintenance worker: "This is [name of worker] from the maintenance department. Is anybody home?" If you hear no response, wait approximately one minute; (2) knock again, announce oneself, and wait another minute; and (3) if no one responds again, knock a third time and, while unlocking the door, announce loudly again that you are entering the unit.

Any maintenance employee or outside contractor working in a resident's apartment must hang a maintenance sign on the exterior doorknob of the apartment. This policy is to ensure that the resident does not find someone in their apartment unexpectedly and is for the benefit of the employee as well as the resident.

Upon completion, each work order shall be signed by both the worker and the resident. If the resident is not home, the worker shall leave a completed copy of the form in the apartment. All information on the work order form should be completely filled out (description of work completed, hours worked, materials used, etc.). In addition, the worker shall leave a sign on the outside of the door indicating that maintenance had been in the unit. **On each work order the worker shall, where appropriate, mark the presence of bad housekeeping.** The worker shall also recommend any charges for damages.

The maintenance worker should always clean up after the work is completed, avoid contact with resident's personal belongings, accomplish tasks as quickly as possible, remain courteous, and avoid all contact of a personal nature.

If the work cannot be completed at that time, such as might be the case if parts must be ordered, the worker should offer residents a realistic completion date. If the worker is not sure when the work can be completed, it will be necessary for the maintenance staff to phone or visit the resident once the information is known.

Close Out

All completed work orders should be delivered to the Housing Manager for approval, who must sign them before they are closed out. Completed work orders should be closed out (a task performed by the

administrative staff at the property) within 24 hours after completion. The Housing Manager is responsible for authorizing and posting all charges.

The Housing Manager is responsible for monitoring on a daily and weekly basis the status of outstanding work orders to determine the cause of any delay and to take appropriate action.

5. Unit Turnover

Pre-move-out Inspection

The Maintenance Team * and the Housing Manager will perform a pre-move-out inspection and complete the inspection form for all units on notice to move-out. The purpose of this inspection is to get an idea of the work that will be needed upon move-out to return the unit to rent ready condition. The inspection form should be completed as soon as possible after receiving written notice to vacate or no later than the 25th of the month allowing sufficient time to order any parts, supplies, or schedule vendors needed for unit turnover. Ordering parts and supplies, and scheduling vendors ahead of time, will ensure that turns are completed in a timely manner and will reduce vacancy loss. On or before the 15th of each month, the Maintenance Team * will obtain a list of all units on notice for that month from the Housing Manager. Using this list, the Maintenance Team * will work with the office staff to schedule a date or send out a 48-hour notice to enter to all units on notice.

Once pre-move-out inspections are complete, supplies are ordered, and vendors scheduled, the Maintenance Team * should provide the Housing Manager with projected rent ready dates for all units.

Move-out Inspection

The Maintenance Team * and the Housing Manager will perform all move-out inspections on the day of the move-out. If the move-out is scheduled on the Staff's day off, then the inspection will be performed the next business day. The Maintenance Team * will have the pre-move-out form and note any additional repairs that may be found.

All move-out charges should be taken from the list of Agency charges to ensure that all residents are treated fairly and that charges are consistent.

All move-out charges should be documented, and **photos taken**. The completed list of move-out charges and photos will then be given to the Housing Manager for use in completing the move-out inspection form.

Make-Ready

Once a unit has become vacant and the pre-move-out and move-out inspections have been completed, the Maintenance Team * should then assign the unit to a maintenance staff member for turnover. A copy of the Unit Make Ready Checklist will be completed for each unit turned, and permanently filed in the maintenance file once the turnover is completed. The Maintenance Team * and the Housing Manager must both inspect and sign off on the checklist before the unit is to be shown to prospective residents.

The Maintenance Team * will also be responsible for scheduling all contracted work for the units following the budget. All contracted work should be scheduled and approved by WL MGMT after the pre-inspection is completed to ensure that vendors are available when needed. Trying to schedule vendors at the beginning of the month can be very difficult and slow the process of unit turnovers. All unit turnovers should be completed and signed off by the Maintenance Team * and the Housing Manager no later than **five days after move-out**, although a three-day turnover is preferred. If a unit is not going to be ready by the 5th day, or is in need of extensive work, the Director of Housing should be notified immediately and provided with a detailed list of the repairs needed. During unit turnover, all preventive maintenance items should be performed and noted in the unit's maintenance file. (At all sites, a separate file will be maintained on each unit for work orders and information regarding repairs and replacements, which will, among other benefits, save time during annual inspections and enable staff to prolong the life of the unit.)

6. Preventive Maintenance

Each property is to have a formal Preventative Maintenance (PM) program. PM is the systematic planning, scheduling, completion, and documentation of work tasks that are conducted to ensure the continued life of all facilities, mechanical systems, and equipment. There is often a fine line between work that is defined as PM and work that actually falls within the category of seasonal or planned maintenance activities. Examples of the latter might include cycle touch-up painting or spring and fall fertilization programs. For the purposes here, PM includes these seasonal and planned activities as well.

When PM is properly implemented, it will minimize unexpected or premature failure of equipment, property, and systems. It will also reduce the number of on-demand maintenance requests and, as such, improve customer satisfaction.

All daily maintenance and repair work should be approached with PM in mind. For example, any cracking asphalt, chipped paint, leaky gutters, etc., should be noted during daily property inspections and action taken before the problem worsens.

Each year, the Housing Manager in conjunction with the Maintenance Team * shall prepare an updated PM schedule and have it reviewed/approved by the Executive Director and/or the Director of Housing as part of the annual budgeting process. Included with that PM program shall be an annual landscaping plan.

The Maintenance Team * will provide the completed PM report to the Housing Manager on the 25th of each month, detailing the work completed in the prior month on the PM plan.

The PM program for each site should include but is not limited to cycle painting, apartment rehab, and appliance replacement. The following represents minimum standards for PM at each site.

Unit Interiors

Unit interiors will be inspected for needed maintenance and repairs a minimum of once per year, generally after Annual Unit Inspections have been completed. Items found needing repair during the annual inspection will be documented, work orders will be generated, and repairs completed as soon as possible.

During the unit interiors inspection, the Maintenance Staff should check for the proper operation of all heating/cooling systems, mechanical systems, electrical systems, appliances, plumbing fixtures and drains. All walls, ceilings, doors, countertops, cabinets, hardware, windows, and floors will also be inspected for any sign of problems or wear and tear that may require repair or replacement.

A copy of the annual unit inspection form should be used for the purpose of doing unit interior inspections.

The forms provide a list of items that are required to be inspected, cleaned, or replaced upon every inspection. It will also provide a guide for the maintenance staff member performing the inspection, in order to ensure that nothing is overlooked. The form chosen depends on whether or not all units are being inspected at one time, or units are inspected annually at income recertification.

Common Areas, Grounds, and Building Systems

The Agency considers proper landscaping and maintenance for the grounds and common areas critical to a successful project. Curb appeal is also one of the measurements used by owners to determine if a management team is performing well. Regardless of who is assigned the tasks of maintaining the landscaping and grounds, the Maintenance Staff is responsible for making sure the grounds present a well-kept and orderly appearance at all times.

The PM of all common areas should be performed on a continuous basis, so nothing goes unchecked for extended periods of time. Staff members should always be looking for any problems when walking or driving through the property. If problems are found, work orders should be written, and repairs should be made.

Common areas require janitorial services daily. Entranceways, hallways, and stairways require day-by-day monitoring for trash and other discarded materials and dirt. Floors must be mopped or vacuumed daily, or more frequently as needed in bad weather.

Periodically, walls must be washed or painted, and floors professionally cleaned. All loose or damaged flooring must be repaired or replaced when observed. As with landscaping, clean and well-maintained common areas help to raise the success level of the apartment community and the satisfaction of the resident.

Once a week, the Maintenance Team * and Housing manager will walk the property and inspect all common areas and grounds, noting any repairs that are needed. When the repairs have been made, a copy of the checklist will be given to the Housing Manager for recordkeeping and budget purposes. The inspections of building systems will be performed at a minimum on a monthly basis, using the Annual Property Inspection Form. Many items will need to be inspected by an outside contractor for insurance, liability, and/or safety purposes (Elevators).

Some items may need to be inspected more frequently than annually. For example:

- Air conditioners will be inspected and serviced at least once annually during the early spring months. Repairs and inspections may be done by in-house staff if staff includes a qualified air conditioner repair person, or in combination with an air conditioner contractor.
- Roofs, gutters, and downspouts should be inspected approximately every three months or after a heavy rain or windstorm. In most if not all cases roof inspection will have to be performed by an outside contractor due to liability issues.

7. Working Hours

Generally, the maintenance staff shall work during the hours of 8:00 a.m. to 5:00 p.m. Each property should also assure adequate weekend coverage. If the Housing Manager determines that there should be any change in working hours to improve maintenance responsiveness, approval will be needed from the Executive Director and/or the VP of Housing.

Uniforms

The Housing Manager shall see to it that all Maintenance staff report to work in proper attire. Such attire is to include:

- Shoes with safety toes;
- Agency-issued uniforms that are clean and well-kept, with the name of the employee embroidered on the front of the shirt; and
- Badge/identification card prominently displayed during the entire workday.

Proper attire is beneficial to the Agency for reasons of morale, safety, professionalism, and customer service.

9. Inventory and Materials Management

The Maintenance Staff should strive to maintain a level of inventory at the site that balances the need for a ready supply of materials with the need to reduce the costs of carrying such an inventory. Generally, this will mean maintaining a two-week supply of the most commonly used items. It should be kept in mind that even this supply level will be determined according to the speed by which parts/supplies can be obtained and the rate of usage. In this regard, it is critical for the Maintenance Team * with help from the Clerk and the Housing Manager to regularly anticipate and plan for upcoming material needs, particularly in conjunction with the annual and monthly work plans. The Maintenance Team * and Clerk are ultimately responsible for maintaining a proper inventory of supplies and have the responsibility of overseeing the control of that inventory.

Location

Supplies, tools, and equipment should be kept in a secure location, locked up when not in use. Equipment and tools should be engraved with the property or WL MGMT identification number and telephone number. The size of the stockroom(s) will be based on the unique needs of the property. However, the Maintenance Staff should strive for economy of storage. With proper materials planning, the need for stockroom/Maintenance Shop space can be greatly minimized. Additionally, the smaller the space and the smaller the inventory, the easier it is to control that inventory.

All stockrooms/Maint. Shop should be well-lit, clean, and organized to allow for easy inspection and proper planning. Material should be stored on shelves and not on the floor. Remember that an annual inventory must be conducted.

Inventory Log

Your community should have an extensive Inventory Log in the binder listing all capitalized equipment and property at the site, the model number, make, date of purchase (if available) and the dollar amount. As additional items are bought or replaced, the log should be updated. Copy will be kept at the Clerk office.

Appliance Control

All appliances are capitalized and shall have serial numbers. The Housing Manager maintains a log of appliances that tracks whenever appliances are transferred out of a unit. This log should be up-dated whenever changes or replacements are made. These serial numbers should be verified on the annual unit inspection and any changes made at that time. Additionally, each property shall maintain at least one reconditioned refrigerator in good working order at all times, which can be loaned to residents on a temporary basis and stored at the development when not in use.

Periodic Stockroom Inventories

Each property will conduct periodic inventories of their stockrooms/Maintenance Shop. The Maintenance Staff should then adjust quantities appropriately.

Tool Equipment Issue and Control

The Maintenance Staff is responsible for maintaining proper control over tools and equipment. Properties will have different power equipment needs. For example, while all properties should have a key machine, not all properties will need a sit-down mower. The Housing Manager is responsible for assuring that the property is adequately equipped and that the resources needed for that equipment are planned for in the annual budget process (for example, blowers, drain machines, key machines, etc.). The Maintenance Team * must maintain inventory records on all property tools and equipment. Tools and equipment listings should be provided to the Housing Manager whenever there has been a staff change, new tools or equipment are purchased, or upon request by the Executive Director and/or the VP of Housing

Items that need to be removed from the Inventory List because of break down, failure, or for any other reason must be approved and signed off by the Housing Manager. Any and all items on the Inventory List must be accounted for by the Maintenance Staff or Clerk.

Tool Storage

Equipment should be stored in a secured area. Preferably, shadow boards should be used to identify the exact storage location of each tool and whether it is missing or on loan. Tools and equipment should not be brought home by employees and should be returned to the shop at the end of the day.

Equipment Repair Histories

Any motorized equipment should be serviced in accordance with manufacturer's recommendations. Records of this maintenance should be kept on file. All equipment instructions/manuals should be kept in the Clerk office.

10. Shop Organization

The Maintenance Team * is responsible for ensuring that all maintenance shops, garages, storage units, and maintenance offices are well kept. All maintenance areas should be clean, organized, and fully accessible at all times to ensure a safe and decent work environment for all staff members. The Maintenance Team and the Housing Manager should inspect all maintenance areas daily for general upkeep purposes to ensure safety.

Doors should open completely and freely.

- Floors should be clean and free of obstructions so as to allow access to all areas.
- All parts/supplies should be organized and on shelves or in bin boxes.
- Shop tools such as Key Machines and Bench Grinders should be securely mounted to a workbench or other solid surface.
- All other tools should be hung on the wall, in a tool rack, or stored so as not to limit movement or access to any part of the shop.
- Large or heavy parts should be kept on lower shelves or stored in a safe manner.
- Old or broken parts should be stripped of usable parts and disposed of properly.
- All flammable or caustic materials such as oil-based paint, thinners, or acids should be stored in an approved location and container.

The Maintenance Team */Housing Manager is also responsible for acquiring and keeping up-to-date property plans and drawings (as built) if available. A copy of the On-Site Procedures Manual will be kept in the office. The maps with the Emergency Procedures Manual showing the locations of all electrical, water, and gas shutoffs will prove invaluable during emergencies. As -built drawings and accurate property applications will also assist in obtaining accurate bids for major repairs.

11. Purchasing

The Maintenance Team *, with approval from the Housing Manager, will coordinate the purchase of all parts and materials needed for the maintenance program. The Maintenance Team * should obtain a current copy of the property budget that covers maintenance parts, supplies, and contracts from the Housing Manager. All expenditures for parts and supplies must stay within budget parameters and be approved by the Housing Manager. All contracts, major purchases, or purchases that exceed the budget limit must be authorized by the Housing Manager and approved by the Executive Director and/or the VP of Housing. A spending limit of \$600 to \$2000 has been imposed on all purchases depending on the purchase. Purchases over this limit must be approved by the Executive Director and/or the VP of Housing.

Except for emergency purchases, the Maintenance Staff should attempt to purchase supplies on a weekly basis, although monthly purchasing is preferred. The Maintenance Staff is required to keep track of all supplies used during the course of the maintenance program, and to anticipate the number of replacement items that will be needed during any given period based on past use. Supplies and contracted work needed for unit turnover should be ordered or scheduled in advance of the unit becoming vacant. The pre-move out inspection will determine what work or parts are needed in each unit to return it to rent ready status. By keeping accurate records, the Housing Manager and the Maintenance Staff can ensure that enough parts are kept inventoried and available for timely repairs. Conversely, the Housing Manager and the Maintenance Staff will also be sure that supplies are not overstocked.

12. After-Hours Procedures

Routine work requests will only be accepted during regular hours of operation.

To report a maintenance emergency after-hours, on weekends, or during holidays, a resident shall call the twenty-four-hour answering service for the Agency/Property. The answering service is provided with the Agency's policy on what constitutes an emergency and the need for a call-back. If the situation calls for it, the answering service will immediately contact the first name on the duty roster for the Agency/Property, which will go to the location to contain or fix the situation. If the emergency situation cannot be immediately resolved, the technician will contact the development's Maintenance Team * for further instruction.

Each on-duty Maintenance Specialist will report all activity from the previous night during the first two hours of the next business day on the After-Hours Work Form.

When an emergency work order has been sufficiently abated, but the problem is not fully corrected, the emergency work order will be closed and, in its place, another work order will be submitted as a non-emergency work order for either urgent or routine response.

The Housing Manager, Maintenance Team *, and/or on-call staff member will all carry cellular phones at all times whether on or off the property. When on vacation, or other leaves of absence, the duties of the Housing Manager or Maintenance Team * will be assigned by the individual's staff to a designated replacement for the duration of the absence. The on-call staff member must respond to all after-hours calls or pages within ten (10) minutes.

13. Maintenance Quality Inspection

The Maintenance Team * and the Housing Manager must, from time to time, inspect a small sample of completed work order to check work quality and talk to the resident about the service he/she received. Provide the resident with 48- hours' notice of the intent to enter the unit.

14. Vehicles

In accordance with the approved operating budget, some properties might be assigned maintenance vehicles (usually, a pick-up truck, scooter, or golf cart). Where properties are provided with such vehicles, the Housing Manager/Maintenance Team * shall make sure that:

- Assigned parking spaces are available for all Agency vehicles
- Vehicles are left in a secured location after-hours
- Vehicles are not used for personal use
- Vehicles are locked when unattended
- Vehicles are clean
- Vehicles are maintained in operating order
- PM is performed as per manufacturer requirements
- The vehicles are operated only by appropriate Agency personnel and that drivers use safe driving practices, such as always wearing seat belts, having valid drivers licenses, carrying proof of up-to date insurance, etc.

- Keys are never left in the vehicle.

Each day, the driver assigned to the vehicle should check:

- Tires (wear, pressure, etc.);
- Frame and suspension (loose bolts, cracks, etc.);
- Parking brakes;
- Safety lights;
- Fluid levels;
- Starter safety switch;
- Transmission shift indicator;
- Instrument gauges; and
- Spare tire and jack.

Any damage to the vehicle should be reported immediately and an accident/injury report filed.

Maintenance vehicles may only be operated or ridden by authorized employees. Employees who allow residents, guests, or other persons to operate or ride on maintenance vehicles or equipment will be subject to disciplinary action up to or including termination of employment.

15. Reporting Problems

The Maintenance Staff shall notify the Housing Manager, who in turn shall notify the VP of Housing, if any of the following occur at the property:

- Property damage;
- Vandalism;
- Accidents (vehicle or personal);
- Health problem; and/or
- Safety problem.

These incidents shall be reported on the Incident Report form. A copy of that form should be faxed immediately to Legal so that they may determine if additional action is required.

16. Dumpsters

The Housing Manager and the Maintenance Team * should ensure that there is appropriate dumpster service, taking into consideration size, placement, frequency of pick-up, and time of pick-up. In addition, the area around the dumpsters should always be swept clean and dumpster interiors should be sprayed with disinfectant at a scheduled time.

As per health department regulations, all drain holes at the bottom of dumpsters must be closed or covered to prevent entry by rodents.

Finally, the condition of dumpsters shall be monitored. It is impossible to prevent the infestation of dumpsters that are rusted out.

17. Grounds Maintenance

Each Maintenance Team * should work with the Housing Manager and Executive Director and/or the VP of Housing to establish a grounds maintenance program for their particular development. This program should address such items as: fertilization, irrigation, frequency of cuts, flowers and plantings, mulching, shrub care, pruning, aeration, etc. In most cases, these services will be performed by a qualified contractor. The Housing Manager and Maintenance Staff should routinely review the work of this contractor.

Guidelines for annual grounds/landscaping program will be on the “shared” H: drive.

18. Warranties

The Housing Manager, WL MGMT Clerk and Maintenance Team * maintain all warranties in a file. The site should identify items protected by warranties and items that are not warranty protected. Generally, the roof, heating and air-conditioning equipment, pumps, water heating, and apartment appliances are covered by warranties.

Warranties provide service coverage for an item that may need repair or replacement. If service is not performed by the manufacturer or a manufacturer-designated contractor, the warranty may be voided. The maintenance staff is to be informed of warranties and service coverage prior to conducting any maintenance on the systems.

19. Graffiti

All graffiti should be removed from the property within 24 hours after initial detection. Properties that experience a significant graffiti problem must invest in efficient graffiti-removal equipment.

20. Service Contracts

Work not performed by maintenance staff is considered contracted work, and falls into one of three categories: ongoing maintenance contracts, standard vendor services, and capital projects. Approval and termination of all contracts must be authorized by the Executive Director or a designee.

In accordance with the Annual Budget, the Housing Manager is responsible for ensuring that all appropriate services are delivered to the property and decides which services will be provided in-house and which services will be contracted out with the approval of the VP of Housing.

Regardless of the type of work contracted, all vendors are required to fill out vendor registration paperwork.

Ongoing Maintenance Contracts

Ongoing maintenance contracts are typically for set monthly amounts and are in place for up to a 12-month period. Examples include: landscaping contracts, security service contracts, fire and security alarm monitoring, etc. A copy of all current maintenance contracts is kept at the property and WL MGMT Clerk office.

Ongoing maintenance contracts should be reviewed prior to renewal by both the site staff and the VP of Housing. Contracts are typically re-bid prior to expiration in order to ensure the best service at the lowest cost. When reviewing bids, be careful to pay attention to the specifics within the contract to

make sure that everything is equal. Are all the bidders for landscaping services including fertilization? Or is that extra?

One way to ensure that all bids are truly comparable is to provide detailed scopes of work.

It is the responsibility of the Maintenance Team * and the Housing Manager to make sure that contracted vendor's complete ongoing maintenance as specified in the contract. If, for example, the landscape maintenance company is not performing weed control as specified in the contract, it is the Maintenance Team *'s responsibility to bring it to the contractor's attention and, if the problem persists, to inform the Housing Manager.

Standard Vendor Services

A great deal of work contracted at the site is done by outside vendors through simple Purchase Orders. Work of this type includes carpet cleaning, unit painting, apartment cleaning, etc.

Even though formal contracts are not required for small jobs, it is important to follow all rules for vendor registration and pricing (3 Bids process). As with ongoing maintenance contracts, it is important to compare quotes from other vendors regularly to ensure that the property is receiving the best available pricing.

Capital Projects

Larger, non-routine contracts fall into this category. Exterior painting, a new trash compactor, or re-carpeting the office is all examples of capital projects. All work falling into this category will be coordinated through the Maintenance Team *, the Housing Manager, and the Executive Director and/or the VP of Housing.

Typically, major capital projects are funded by the Agency's Capital Fund rather than the operating budget. For LIHTC sites the replacement reserve escrow maybe used.

21. Inspections

A primary goal of maintenance personnel is to keep the property in good physical condition. Ongoing inspections are imperative to catch potential problems before they worsen. It is the responsibility of maintenance staff to tour the property daily and note areas of concern. Has siding fallen off the building? Are some of the gutters clogged? Are some of the curbs crumbling? These are all issues that should be discovered and dealt with on a day-to-day basis through regular daily property inspections. In addition to these daily inspections more detailed inspections are done on an annual or as-needed basis, including:

- Annual Unit Inspections. This inspection is to be done at least on an annual basis to locate any potential maintenance issues as well as to determine the general condition of a property's unit interiors.
- Pre-Move-out and Move-Out Inspections.
- Move-in Inspections.
- Annual Property Inspections/Detailed Common Area Inspections.
- REAC/HUD/LIHTC/HOME/Other Inspections. On a periodic basis, HUD's Real Estate Assessment Center (REAC) or Florida Housing Corporation (LIHTC, HOME, Etc...) contracts with third-party contractors to inspect all properties. At least 3 months (if possible) prior to a REAC/LIHTC inspection, site maintenance staff and the Housing Manager shall inspect all unit interiors as well as the entire property for obvious maintenance or repair issues and remedy all problems that are discovered. Common deficiencies noted during REAC/LIHTC inspections include: vegetation overgrowth, missing downspouts, water leaks, damaged doors, missing siding, trees or shrubs coming in contact with buildings, graffiti on buildings, ponding water, exposed wiring, outdated fire extinguisher inspections, inoperable smoke detectors, potholes in parking lots or roadways and neglected play areas.

22. Salvage/Disposition of Materials

Outdated and worn-out equipment and materials are to be disposed of if the materials are obsolete, must follow WL MGMT policy.

23. Fire Code Violations

Through the use of the daily property inspection, the Housing Manager/Maintenance Team * should assure that the property is free of fire code violations. A file of fire code violations must be maintained containing copies of completed work orders or service tickets to demonstrate their correction.

24. Emergency Hurricane Plan

The Housing Manager under WL MGMT supervision (WL MGMT already has one) is responsible for developing an Emergency Plan. This plan should be clearly posted on the bulletin board in each lobby. When residents move in, they are also to be given a copy of the Emergency Plan.

25. Domestic Hot Water

The acceptable and energy saving temperature for domestic hot water is 115 degrees F.

26. Weekend and Holiday Coverage

The Maintenance Staff should plan for holiday and weekend coverage as necessary.

The Housing Manager shall request employees to submit desired vacation days in order to make sure that the site is never left shorthanded.



1/1/2023

Mold Policy

and Procedures

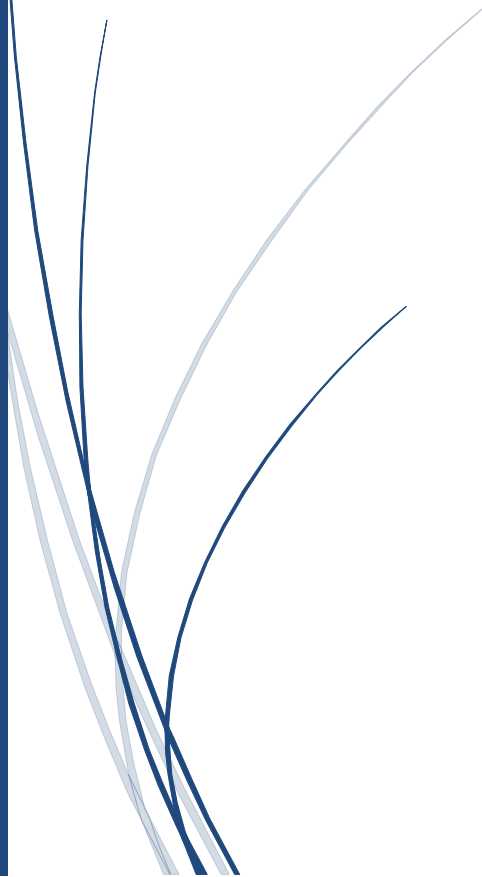


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I. GENERAL INFORMATION

Concern about mold in both the residential and occupational setting is escalating. While there are many unanswered questions about potential health effects of mold, it is prudent for property owners/managers to (1) repair any known conditions involving excessive moisture that could, under the right conditions, lead to mold growth and (2) clean and remove any mold growth when it occurs. In order to accomplish this objective, it is important to establish a partnership between the property's management staff and residents so that conditions that require attention are identified and dealt with promptly.

Some companies have begun to include specific lease language that informs residents of their obligation to prevent mold through routine housekeeping and to report the presence of moisture/mold in their apartment home to the management staff.

Note: The National Apartment Association lease contains a mold lease addendum.

In addition, companies have found it useful to provide their residents with educational information about mold and how to prevent mold growth in apartments. This information could be provided to residents as part of their move-in package. A "Tip Sheet on Mold" is found at **Attachment A**. Alternately, if you wish to provide residents with a publication that has been prepared by a state or federal entity or other groups about mold and indoor air quality in general, please see:

Consumer Federation of America (in conjunction with the EPA): How Healthy is the Air in Your Home? A Room-by-Room Checklist for Your Home's Indoor Air <http://www.consumerfed.org/healthair.pdf>

U.S. Environmental Protection Agency: A Brief Guide to Mold, Moisture, and Your Home <http://www.epa.gov/iaq/molds>

II. TRAINING

There are no specific training requirements currently mandated by state and federal law for workers who may remediate mold as part of their responsibilities. **On-site staff should receive** training necessary to carry out their responsibilities with respect to communicating with residents; cleaning, removing and restoring damaged surfaces, and documenting all remediation efforts.

Although there are no established Permissible Exposure Levels (PELs) or Threshold Limit Values (TLVs) for mold, as part of the required training under OSHA's Hazard Communication Standard (29CFR 1910.1200), workers must be informed about safe work practices for using various chemicals, including disinfectants, and personal protective equipment, which may be a part of a mold response. Workers who may be involved in cleanup of extensive mold should be supplied with appropriate respirators, which may involve compliance with OSHA's Respiratory Protection Standard (29 CFR 1910.134). Additional information on these regulations is available at www.osha-slc.gov/dts/osta/oshasoft/hazexp.html and http://www.osha-slc.gov/SLTC/respiratory_advisor/mainpage.html respectively.

On-site staff should be familiar with procedures to deal with water intrusion/excessive moisture and appropriate remediation techniques for water-damaged surfaces. Workers should also review any company-specific policies and procedures and be familiar with the appropriate corporate/management contact person, should decisions need to be made concerning testing or activities beyond their scope of training or responsibility.

III. ROUTINE MAINTENANCE

Routine maintenance and turnover activities provide on-site staff with the opportunity to monitor and correct any conditions involving moisture that could lead to the growth of mold. Treatment of mold should be incorporated into general property management activities. **Staff should perform** an inspection for mold as part of unit turnover inspection. Any visual mold growth should be immediately and properly remediated as part of the requirements of the turnover process. A sample monitoring checklist is found on page 4.

On-site staff should also be encouraged to monitor the property for signs of moisture, water damage or situations that may lead to conditions favorable for mold growth (e.g., leaking faucets, broken sprinkler heads) when conducting other maintenance activities. Also, be aware of situations such as carpet-cleaning techniques, which may leave carpets too damp and run the risk of creating conditions favorable for mold growth.

Inspection

A visual inspection is the first step in identifying the extent of moisture damage, which may create conditions favorable for mold growth. To the maximum extent possible ceiling tiles, gypsum wallboard, cardboard, duct liner, wood, carpet, paper, and other cellulose surfaces should be given careful attention during a visual inspection. Kitchens, bathrooms, windows, and HVAC systems should also be scrutinized.

An earthy or musty odor may also indicate that mold is present. The use of a moisture meter, to measure the saturation in building materials, is useful in evaluating the extent of water damage and determining when the appropriate moisture level has been restored. Under further investigation, it may be necessary to look inside of wall

cavities or filter areas to determine the extent of any water damage or mold growth.

Once mold growth is observed, the extent of any damaged area should be evaluated in order to determine appropriate remedial strategies based on EPA guidance. Consult Attachment B for a list of materials and equipment that are needed to deal with water intrusion/mold remediation.

EPA's Tips for Maintenance Personnel¹

- Fix leaky plumbing and leaks in the building envelope as soon as possible.
- Watch for condensation and wet spots. Fix source(s) of moisture intrusion as soon as possible.
- Prevent moisture due to condensation by increasing surface temperature or reducing the moisture level in air (humidity). To increase surface temperature, insulate or increase air circulation. To reduce the moisture level in air, repair leaks, increase ventilation (if outside air is cold and dry), or dehumidify (if outdoor air is warm and humid).
- Keep heating, ventilation, and air conditioning (HVAC) drip pans clean, flowing properly, and unobstructed.
- Vent moisture-generating appliances, such as dryers, to the outside where possible.
- Maintain low indoor humidity, below 60% relative humidity (RH), ideally 30-50%, if possible.
- Perform regular building/HVAC inspections and maintenance as scheduled.
- Clean and dry wet or damp spots within 48 hours.
- Don't let foundations stay wet. Provide drainage and slope the ground away from the foundation.

Proper HVAC Maintenance

Improperly cycling HVAC systems or improper use by the residents, can result in conditions of excessive humidity, which could lead to mold growth. Develop maintenance guidelines based on manufacturer's specifications for HVAC ventilation equipment (including appropriate settings, filter changes, and cleaning).

¹ Source: EPA, "Mold Remediation in Schools and Commercial Buildings" at p. 3 (March 2001, Updated June 2001).

Sample Checklist

On-site staff **should be encouraged** to monitor the property for signs of water damage/mold growth or situations which could result in water damage (e.g., broken sprinkler head). Each unit should be surveyed for signs of water damage/mold at unit turnover. Inspection for water damage/mold should be incorporated into a community's turnover checklist. A complete unit turnover checklist can be found in other NAA CAMT materials.

Check boxes for **Clean** (areas are clean, equipment is properly functioning, no work required) or **Corrected** (deficiencies repaired). File completed checklist in unit maintenance file.

Unit exterior (signs of holding water or missing building components)	clean/corrected	Kitchen (note any signs of current or past signs of moisture)	clean/corrected	Bedroom (s) Indicate Locations	clean/corrected
Check Roof		Check Inside all Cabinets		Check Windows	
Check Gutters/Downspouts		Check Sink		Check Sliding Doors	
Check Stairs		Check Faucets		Check Walls and Ceilings	
Check Landscape		Check Flooring		Check Carpet	
Check Exterior Utility Closet		Check Walls and Ceilings		Check Carpet Tack Strip in Corners	
Check Irrigation System		Check Doors		Check Closet(s)	
Interior Entry (note any signs of current or past signs of moisture)	clean/corrected	Check Windows		Closets (note any signs of current or past signs of moisture)	clean/corrected
Check Door surfaces		Check Refrigerator		Check Shelving	
Check Inside of Closet		Check Ice Maker (connections)		Check Walls and Ceilings	
Check Windows		Check Dishwasher (underneath)		HVAC	clean/corrected
Check all Baseboards		Check Waste disposal		Check Operation	
Check Walls and Ceilings		Check Washing Machine		Check Air Circulation	
Check Flooring		Check Hoses		Check Thermostat	
Check Carpet		Check Dryer		Check Evaporator Coil	
Check Carpet Tack Strip in Corners		Check Dryer Vent		Check Condensate Pan	
Living Room	clean/corrected	Bathroom (s) Indicate Location	clean/corrected	Check Condenser Coil	
Check Inside of Closet		Check Lavatory Sinks		Check Condenser Fan Motor	
Check Doors		Check Bathtubs/Showers		Check Furnace	
Check Windows		Check Toilets		Check Baseboard Heaters	
Check all Baseboards		Check Inside all Cabinets		Check all Vents	
Check Walls and Ceilings		Check Shelving		Change Filters	
Check Flooring		Check Flooring			
Check Carpet		Check Walls and Ceilings			
Check Carpet Tack Strip in Corners		Check Interior Doors			
Check Fireplace		Check Windows			
		Check Bathroom Exhaust Fans			
Patio/Balcony (note any signs of current or past signs of moisture)	clean/corrected	Hallways (note any signs of current or past signs of moisture)	clean/corrected		
Check Roof		Check Walls and Ceilings			
Check Exterior Doors		Check Interior Doors			
Check Deck Surface		Check Windows			
Check Water Heater (all fittings)		Check Carpet			
Check Storage Closet		Check Carpet Tack Strip in Corners			
Check Exterior Paint					

IV. GUIDELINES FOR PROCESSING A MAINTENANCE SERVICE REQUEST

At the Office

1. Fill out a service request form and in doing so; record the observations of the resident regarding the presence of conditions that may be favorable to mold growth, or whether the resident believes mold growth is present. If a health concern is expressed or property damage is reported, immediately contact [insert name of appropriate corporate/management contact person] and submit an Incident Report.

Note: If the resident has had the mold tested, send a copy of the test results to [insert name of appropriate corporate/management contact person].

2. Treat the service request as a priority.
3. Complete the **Incident Tracking Log** (sample found at the end of this chapter). Maintain the Log in the management office.

At the Service Location

1. Determine the nature and extent of conditions favorable for mold growth, or mold, if any. Determine the source of any water infiltration or excessive moisture – interior and exterior.
2. If a source of water or excessive moisture is found: Stop the leak or cause of excessive moisture and dry all affected areas completely immediately, or within 24 hours of notification. Consult the procedures for drying out surfaces found in **Chapter V, Table 1**.
3. If no mold is found: Send **Resident Follow-up Letter** (sample found at the end of this chapter) indicating results of investigation.
4. If mold is found: Clean up the mold following the procedures outlined in **Chapter V, Table 2**.
5. Use the service ticket (**or Resident Follow-up Letter**) to inform the resident of the corrective action completed and additional steps to be taken, if any.

Back at the Office

1. Before determining that the remediation will require the use of outside professionals or that a unit be vacated, consult [insert name of appropriate corporate/management contact person] for guidance.
2. Complete the **Incident Tracking Log** to reflect what action was taken.

Within 7 – 10 Days

1. Send a **Resident Follow-up Letter**.
2. Log the follow-up action on the **Incident Tracking Log**.

**** COMPLETE EVERY STEP OF THESE GUIDELINES WHEN POSSIBLE****

**(Sample)
Incident Tracking Log**

Apt. #	Reported by:	Date	Condition Reported	Action Taken	Follow-Up Date	Follow Up Action
A1	Mr. Jones, Resident	Date	Smells musty	Inspected the apartment, repaired and dried out leak in the bathroom	Date	Sent follow-up letter to resident
B2	Maintenance	Date	Visible mold on window sill	Cleaned area with disinfectant	Date	Sent follow-up letter to resident

V. PROCEDURES FOR MOLD REMEDIATION

Once mold is identified, it is essential to identify and correct the underlying source of water intrusion. Otherwise, mold growth will recur. Generally speaking, if mold is either seen or smelled, it should be remediated. Thus, a visual inspection is the first step to assessing a mold service request (See Chapter III, page 2). According to the previously mentioned EPA guidelines, it is not essential to identify the types of mold (i.e., test) to remediate the situation. Under certain circumstances, however, it may be important to have building materials/air tested to determine the type of mold present. Consult with [insert name of appropriate corporate/management contact person] before proceeding with any testing.

If extensive (i.e., the total surface area of visible mold is greater than 100 square feet or the potential for increased resident or remediator exposure during remediation is estimated to be significant), it is important to consult an experienced professional with specific experience in mold projects to develop a remediation plan.

Sampling and Testing

Sampling and testing are to proceed only upon the approval of [insert name of appropriate corporate/management contact person]. A reputable Indoor Environmental Quality professional (preferably a Certified Industrial Hygienist) should conduct the sampling. The American Industrial Hygiene Association (AIHA) (www.aiha.org/) and the American Society of Cleaning Restorers (ASCR) (www.ascr.org) may provide leads. There are advantages to identifying a professional contact before you have a problem. A lab, accredited by AIHA's Environmental Microbiological Laboratory Accreditation Program (EMLAP), should perform all testing analysis.

Testing may involve bulk and/or air sampling.

1) Bulk Sampling

- Bulk or surface sampling involves taking a sample of material and performing laboratory analysis. Sampling and testing are not a prerequisite to remediation.

2) Air Sampling

- Air sampling may be utilized if the presence of mold is suspected (e.g., musty odors) but cannot be identified through a visual inspection.
- Any air sampling must also include an exterior air sample as a baseline sample for the ambient environmental level of mold.

- If air sampling is conducted, personnel conducting the sampling must be trained in proper air sampling methods.

Remediation

In all situations, the underlying cause of water accumulation must be fixed or the problem may recur. A prompt response (within 24 to 48 hours) and thorough clean up, drying and/or removal of water-damaged materials will prevent or limit mold growth.

EPA has delineated three levels of remediation, based on the total area of material affected by visible mold growth. (See Table 1 at the end of this Chapter.) EPA's guidelines and suggested work practices include the use of Personal Protective Equipment ("PPE") and containment systems based on the total surface area affected. Adapt or modify these guidelines to fit your situation and contact [insert name of appropriate corporate/management contact person] with any questions regarding retaining outside consultants.

In some circumstances, the property owner/manager may retain an environmental restoration consultant to deal with a water intrusion/mold problem. In other cases, it may be useful to obtain a written protocol prepared by an industrial hygienist or other qualified indoor air quality professional to be used as a guide for on-site staff to follow in conducting the remediation. Under certain circumstances, written confirmation from the contractor, which states that remediation has been performed and the property is habitable, should be obtained.

Table 1: Water Damage – Cleanup and Mold Prevention	
<i>Guidelines for Response to Clean Water Damage within 24-48 Hours to Prevent Mold Growth</i>	
Water-Damaged Material	Actions
Books and papers	<ul style="list-style-type: none"> • For non-valuable items, discard books and papers. • Photocopy valuable/important items, discard originals. • Freeze (in frost-free freezer or meat locker) or freeze-dry.
Carpet and backing – dry within 24-48 hours	<ul style="list-style-type: none"> • Remove water with water extraction vacuum. • Reduce ambient humidity levels with dehumidifier. • Accelerate drying process with fans.
Ceiling tiles	<ul style="list-style-type: none"> • Discard and replace.
Cellulose insulation	<ul style="list-style-type: none"> • Discard and replace.
Concrete or cinder block surfaces	<ul style="list-style-type: none"> • Remove water with water extraction vacuum. • Accelerate drying process with dehumidifiers, fans, and/or heaters.
Fiberglass insulation	<ul style="list-style-type: none"> • Discard and replace.
Hard surface, porous flooring* (Linoleum, ceramic tile, vinyl)	<ul style="list-style-type: none"> • Vacuum or damp wipe with water and mild detergent and allow to dry; scrub if necessary. • Check to make sure underflooring is dry; dry underflooring if necessary.
Non-porous, hard surfaces (Plastics, metals)	<ul style="list-style-type: none"> • Vacuum or damp wipe with water and mild detergent and allow to dry; scrub if necessary.
Upholstered furniture	<ul style="list-style-type: none"> • Remove water with water extraction vacuum. • Accelerate drying process with dehumidifiers, fans, and/or heaters. • May be difficult to completely dry within 48 hours. If the piece is valuable, you may wish to consult a restoration/water damage professional who specializes in furniture.
Wallboard (Drywall and gypsum board)	<ul style="list-style-type: none"> • May be dried in place if there is no obvious swelling and the seams are intact. If not, remove, discard, and replace. • Ventilate the wall cavity, if possible.
Window drapes	<ul style="list-style-type: none"> • Follow laundering or cleaning instructions recommended by the manufacturer.
Wood surfaces	<ul style="list-style-type: none"> • Remove moisture immediately and use dehumidifiers, gentle heat, and fans for drying. (Use caution when applying heat to hardwood floors.) • Treated or finished wood surfaces may be cleaned with mild detergent and clean water and allowed to dry. • Wet paneling should be pried away from wall for drying.

Source: U.S. EPA, "Mold Remediation in Schools and Commercial Buildings" (March 2001, Updated June 2001).

*The subfloor under the carpet or other flooring material must also be cleaned and dried. See the appropriate section of this table for recommended actions depending on the composition of the subfloor.

Table 2: U.S. EPA Guidelines for Remediating Building Materials with Mold Growth Caused by Clean Water*			
Material or Furnishing Affected	Cleanup Methods†	Personal Protective Equipment	Containment
SMALL - Total Surface Area Affected Less Than 10 square feet (ft²)			
Books and papers	3	Minimum N-95 respirator, gloves, and goggles	None required
Carpet and backing	1, 3		
Concrete or cinder block	1, 3		
Hard surface, porous flooring (linoleum, ceramic tile, vinyl)	1, 2, 3		
Non-porous, hard surfaces (plastics, metals)	1, 2, 3		
Upholstered furniture & drapes	1, 3		
Wallboard (drywall and gypsum board)	3		
Wood surfaces	1, 2, 3		
MEDIUM - Total Surface Area Affected Between 10 and 100 (ft²)			
Books and papers	3	Limited or Full Use professional judgment, consider potential for remediator exposure and size of contaminated area	Limited Use professional judgment, consider potential for remediator/occupant exposure and size of contaminated area
Carpet and backing	1,3,4		
Concrete or cinder block	1,3		
Hard surface, porous flooring (linoleum, ceramic tile, vinyl)	1,2,3		
Non-porous, hard surfaces (plastics, metals)	1,2,3		
Upholstered furniture & drapes	1,3,4		
Wallboard (drywall and gypsum board)	3,4		
Wood surfaces	1,2,3		
LARGE - Total Surface Area Affected Greater Than 100 (ft²) or Potential for Increased Occupant or Remediator Exposure During Remediation Estimated to be Significant			
Books and papers	3	Full Use professional judgment, consider potential for remediator/occupant exposure and size of contaminated area	Full Use professional judgment, consider potential for remediator exposure and size of contaminated area
Carpet and backing	1,3,4		
Concrete or cinder block	1,3		
Hard surface, porous flooring (linoleum, ceramic tile, vinyl)	1,2,3,4		
Non-porous, hard surfaces (plastics, metals)	1,2,3		
Upholstered furniture & drapes	1,2,4		
Wallboard (drywall and gypsum board)	3,4		
Wood surfaces	1,2,3,4		

Table 2 continued

*Use professional judgment to determine prudent levels of Personal Protective Equipment (PPE) and containment for each situation, particularly as the remediation site size increases and the potential for exposure and health effects rises. Assess the need for increased Personal Protective Equipment, if, during the remediation, more extensive contamination is encountered than was expected. Consult Table 1 if materials have been wet for less than 48 hours, and mold growth is not apparent. These guidelines are for damage caused by clean water. If you know or suspect that the water source is contaminated with sewage, or chemical or biological pollutants, then the Occupational Safety and Health Administration (OSHA) requires PPE and containment. An experienced professional should be consulted if you and/or your remediators do not have expertise in remediating contaminated water situations.

†Select method most appropriate to situation. Since molds gradually destroy the things they grow on, if mold growth is not addressed promptly, some items may be damaged such that cleaning will not restore their original appearance. If mold growth is heavy and items are valuable or important, you may wish to consult a restoration/water damage/remediation expert. **Please note that these are guidelines; other cleaning methods may be preferred by some professionals.**

Cleanup Methods

- **Method 1:** Wet vacuum (in the case of porous materials, some mold spores/fragments will remain in the material but will not grow if the material is completely dried). Steam cleaning maybe an alternative for carpets and some upholstered furniture.
- **Method 2:** Damp-wipe surfaces with plain water or with water and detergent solution (except wood —use wood floor cleaner); scrub as needed.
- **Method 3:** High-efficiency particulate air (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.
- **Method 4:** Discard _remove water-damaged materials and seal in plastic bags while inside of containment, if present. Dispose of as normal waste. HEPA vacuum area after it is dried.

Personal Protective Equipment (PPE)

- Minimum: Gloves, N-95 respirator, goggles/eye protection
- Limited: Gloves, N-95 respirator or half-face respirator with HEPA filter, disposable overalls, goggles/eye protection
- Full: Gloves, disposable full body clothing, head gear, foot coverings, full-face respirator with HEPA filter

Containment

- Limited: Use polyethylene sheeting ceiling to floor around affected area with a slit entry and covering flap; maintain area under negative pressure with HEPA filtered fan unit. Block supply and return air vents within containment area.
- Full: Use two layers of fire-retardant polyethylene sheeting with one airlock chamber. Maintain area under negative pressure with HEPA filtered fan exhausted outside of building. Block supply and return air vents within containment area.

VI. RESIDENT FOLLOW-UP LETTER

Enter Community Name
Address
Phone Number

Date: ENTER DATE

To: ENTER RESIDENT(S) NAME

From: ENTER COMMUNITY Manager's NAME

Re: Follow-Up

Apt # _____

Dear Resident(s),

It has been (insert appropriate time) days since we inspected (and/or treated) your apartment. We hope that all of your concerns have been addressed (and/or remedied) to your satisfaction.

Please refer to the attached information, which contains useful tips for preventing mold growth in your apartment home.

If you notice any evidence of mold growth in your apartment, please immediately notify the management office.

Attachment

(Attachment can be any of the publications described under Chapter I such as the Tip Sheet on Mold; EPA's anticipated brochure on preventing mold in the home; CA brochure, *Mold in My Home*; or Consumer Federation publication.)

TIP SHEET ON MOLD

It is our goal to maintain the highest quality living environment for our residents. To help achieve this goal, it is important to work together to minimize the potential for conditions that could lead to the growth of naturally occurring mold.

Tips for residents

Residents can help minimize mold growth in their apartment homes by taking the following actions:

- Open windows. Proper ventilation is essential. If it is not possible to open windows, run the fan on the apartment air-handling unit to circulate fresh air throughout your apartment.
- In damp or rainy weather conditions, keep windows and doors closed.
- If possible, maintain a temperature of between 50° and 80° Fahrenheit within your apartment at all times.
- Clean and dust your apartment on a regular basis as required by your lease. Regular vacuuming, mopping, and use of environmentally safe household cleaners is important to remove household dirt and debris that contribute to mold growth.
- Periodically clean and dry the walls and floors around the sink, bathtub, shower, toilets, windows and patio doors using a common household disinfecting cleaner.
- On a regular basis, wipe down and dry areas where moisture sometimes accumulates, like countertops, windows, and windowsills.
- Use the pre-installed bathroom fan or alternative ventilation when bathing or showering and allow the fan to run until all excess moisture has vented from the bathroom.
- Use the exhaust fans in your kitchen when cooking or while the dishwasher is running and allow the fan to run until all excess moisture has vented from the kitchen.
- Use care when watering houseplants. If spills occur, dry up excess water immediately.

- Ensure that your clothes dryer vent is operating properly, and clean the lint screen after every use.
- When washing clothes in warm or hot water, watch to make sure condensation does not build up within the washer and dryer closet, if condensation does accumulate, dry with a fan or towel.
- Thoroughly dry any spills or pet urine on carpeting.
- Do not overfill closets or storage areas. Ventilation is important in these spaces.
- Do not allow damp or moist stacks of clothes or other cloth materials to lie in piles for an extended period of time.
- Immediately report to the management office any evidence of a water leak or excessive moisture in your apartment, storage room, garage, or any common area.
- Immediately report to the management office any evidence of mold growth that cannot be removed by simply applying a common household cleaner and wiping the area. Also report any area of mold that reappears despite regular cleaning.
- Immediately report to the management office any failure or malfunction with your heating, ventilation, air-conditioning system, or laundry system. As your lease provides, do not block or cover any of the heating, ventilation, or air-conditioning ducts in your apartment.
- Immediately report to the management office any inoperable windows or doors.
- Immediately report to the management office any musty odors that you notice in your apartment.

Attachment B

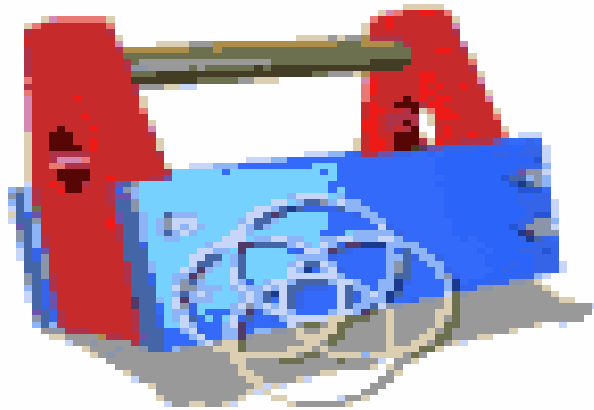
Equipment List

The following equipment is available at most supply stores and is useful to have on site to deal with water intrusion and/or mold remediation.

1. Moisture meter
2. High efficiency particulate air (HEPA) filtered vacuum cleaner
3. Disinfectant or bleach and standard cleaning detergent
4. Wet vacuum
5. Blowers (have on site or know where to rent)
6. Dehumidifiers (have on site or know where to rent)
7. Localized containment bag (2-glove bags)
8. Disposable clothing (1 box)
9. N-95 Disposable Respirators (5 pack)
10. 6-mil disposable bags (1 box)
11. 6-mil Polyethylene sheeting (2 rolls)
12. Yellow caution tape (3 rolls)
13. Plastic spray cleaning bottles
14. Disposable scrub brush, sponges, and cloths



Preventative Maintenance Book



Preventative Maintenance Book

Dear Maintenance Staff and Housing Manager:

As you are aware a resident selects his/her apartment based on five (5) primary criteria:

- Location
- Curb appeal
- Unit size
- Upkeep and maintenance of the units
- Cost.

Two of which are the most vital to the survival of the community directly involves the maintenance department. Curb appeal and the general upkeep and preventative maintenance of the community as a whole.

In a continuing effort to deliver high quality housing services to our residents, we have created this Preventative Maintenance Book as a guide to ensure that the community functions at the highest possible level, remember you **MUST** add activities depending on your site monthly needs.

This Handbook is designed to serve as a guide for “working together” as a team and it, outlines LHA/WLM Management’s policies that apply to all Communities. Please read this Handbook carefully and use it as you need. It is with the understanding that the terms outlined in this Handbook are subject to change, and that this Handbook is not intended to create and does not create an employment contract in any way to modify your employment at will status. If you have any questions or would like to discuss any aspect of the Handbook in greater detail, please contact your Housing Manager, or speak with the LHA Vice-President of Housing.

HANDBOOK USE AND PURPOSE

This Handbook is to support individual performance, development and to provide the information necessary for all of us to make good decisions as we go about our daily work. This means that this Handbook should be used only as a guide, it cannot create binding obligations to be followed in a particular situation; nor can it limit the discretion of your Staff to make decisions at the workplace, or with respect to your employment by the apartment community.

This employee Handbook supersedes any prior employee manuals, policy statements, memoranda, or documents concerning your employment. This Handbook is provided for informational purposes only. Most importantly, this Handbook is not intended to create, nor does it create a contract between any employee and his or her employer, or between you and LHA.

Each apartment community managed by LHA retains the right to change any work condition, whether described in this Handbook or not, without the requirement of consulting or obtaining agreement from any staff member.

All apartment communities managed by LHA follow the policy of employment "at will" and this Handbook reaffirms that principle. This means that your employer retains the right to terminate your employment without cause or reason, just as you are free to end employment without cause or reason.

Each employee is responsible for knowing the contents of this Handbook and should use it as a guide. Please feel free to speak with the Housing Manager or the VP of Housing at LHA if you have any questions about the policies outlined in this Handbook.

January Preventative Maintenance

Property: _____

1. Inspection and do repairs in all storage rooms, buildings exteriors and common areas. (Use the interior inspection report)
2. Company vehicle maintenance oil change, and any other repairs as needed
3. Change Units A.C. Filters
4. Updated and submit inventory (typed) sheet of all shop equipment to include hand and power tools, and office equipment. (Please EMAIL with monthly report).
5. Final check on the operational of all equipment and trucks.
6. Inspect property for leaf removal. If needed review the landscaping contract and schedule the contractor.
7. Clean storm drains of excess leaves and trash
8. Perform the weekly light (both interior and exterior) inspection.

NOTE

Housing Manager _____ Date _____

Maintenance Staff _____ Date _____

February Preventative Maintenance

Property: _____

1. Email a list of any outstanding repairs of all areas, storage rooms, buildings exteriors and common areas that are not yet complete, along with an estimated timeline for completion.
 - a. If there are no outstanding repairs then continue with the inspection of all areas, storage rooms, buildings exteriors and common areas, hallways, laundry rooms, etc. (Use the interior inspection report)
2. Inspection on the HVAC, pipes, and pumps. Oil all pumps and motors. Perform repairs as needed.
3. Inspect and mark out areas on the parking-lots, sidewalks, and curbs for repairs
4. Perform service and repairs on equipment
5. Call your landscape contractor for a schedule of work for the property

Housing Manager

Date

Maintenance Staff

Date

March Preventative Maintenance

Property: _____

1. Email a list of any outstanding repairs of all areas, storage rooms, buildings exteriors and common areas that are not yet complete, along with an estimated timeline for completion.
 - a. If there are no outstanding repairs then continue with the inspection of all areas, storage rooms, buildings exteriors and common areas, hallways, laundry rooms, etc. (Use the interior inspection report)
2. Review the month's schedule of the Landscaping crew or contractor and submit it to the Director of Housing for review. Also, during the first month the landscaper should be scheduled to apply pre-emergent, edging plant beds, tree tings and install the spring mulch, and install early spring pansies (during the first week).
3. Do a walk-through inspection of the property with the landscaper (Contractor of in-house employees) to check for erosion areas, dead trees, and shrubs. Get bids for seeding and plant replacement.
4. For properties with "8" or "6" mains and storm drains (have property drawings accessible is needed) please submit 3 bids for jetting the areas. All other locations please call the county/City to have them jet the mains, upon completion please notify the VP of Housing in writing or by the middle of the month if the process has not been completed by the city.
5. Inspect and repair (replacing where necessary) all playground equipment.
6. Start cleaning A.C. Coils and condensers, and any property owned and maintained window units (at locations that apply).

Housing Manager

Date

Maintenance Staff

Date

April Preventative Maintenance

Property: _____

1. EMAIL a list of any outstanding repairs of all areas, storage rooms, buildings exteriors and common areas that are not yet complete, along with an estimated timeline for completion. If there are no outstanding repairs then continue with the inspection of all areas, storage rooms, buildings exteriors and common areas, hallways, laundry rooms, etc. (Use the interior inspection report)
2. Inspect, and repair all gutters and down spouts. Also check the installation of the splash blocks and fall of the extension pipes
3. Check your property signage, paint, and repairs
4. Check oil, and routine maintenance of company vehicle (repairs as needed)
5. Follow-up on the jetting of storm drains, for properties with "8" mains and storm drains please send a copy of the procedure and the schedule to the director of maintenance.
6. Complete the cleaning of the A.C. coils, "A" Coils; change the A.C. filters throughout the entire property.
7. Service all power washers for use which consist of:
 - a. Oil change
 - b. Spark plugs
 - c. Spray heads and inspect ion of hose and couplings
 - d. Ensure that all staff operating the equipment is familiar with its use.

Housing Manager

Date

Maintenance Staff

Date

Spring and or Summer Cleaning Overview

Below are the tasks that must be completed over the months of April and May and August and September. On or before April 30th please submit a progress report of what is completed (reminder most public schools start closing towards the end of May) Please review your budgets to ensure that if work needs to be contracted out there is enough funding to do so or monies for any additional hours needed by staff to complete the task at hand.

Property _____

Date submitted _____

<i>Total number of Buildings _____ Task to complete</i>	<i>April completion (specific date)</i>	<i>May completion (specific date)</i>	<i>Still not complete (estimated date of completion)</i>
Power Wash			
Stairs			
Dumpster pads /replacement of slates in the areas			
Building list 1. through 2. through 3. through			
Play-ground equipment			
awnings			
Total number of Buildings _____ Task to complete	<i>April completion (specific date)</i>	<i>May completion (specific date)</i>	<i>Still not complete (estimated date of completion)</i>
Painting-Touch ups			
Interior and exterior handrails			
Benches			
Black trash cans and post holders			
All signposts			
Removal of any graffiti from mailboxes (and paint if needed)			
Paint the common area doors (i.e. office, laundry-rooms, shop, etc.)			
Total number of Buildings _____ Task to complete	<i>April completion (specific date)</i>	<i>May completion (specific date)</i>	<i>Still not complete (estimated date of completion)</i>
Hallways			
Repair all drywall			
Clean walls and doors			
Repair and clean light fixtures			
Secure and paint all handrails			
Repairs and patching of concrete steps and landings			

Property _____

Date submitted _____

<i>Total number of Buildings _____ Task to complete</i>	<i>April completion (specific date)</i>	<i>May completion (specific date)</i>	<i>Still not complete (estimated date of completion)</i>
Landscaping			
Walkthrough with the landscaping contractor <i>(note: all bids must be submitted no later than April 30th)</i> *plants and scrubber comments: *erosion area comments *flowers to be planted comments			
Rake out the property (clear location of cigarette butts, glass etc.)			
Contact the irrigation contractor			
<i>Total number of Buildings _____ Task to complete</i>	<i>April completion (specific date)</i>	<i>May completion (specific date)</i>	<i>Still not complete (estimated date of completion)</i>
Parking Lost			
Clean			
<i>Total number of Buildings _____ Task to complete</i>	<i>April completion (specific date)</i>	<i>May completion (specific date)</i>	<i>Still not complete (estimated date of completion)</i>
HVAC			

May Preventative Maintenance

Property: _____

1. Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and commons areas (use the interior inspection report)
2. Complete any outstanding matters from the April PM report.
3. Schedule any concrete and asphalt contractors to start work within the month
(All final schedules subject to final review by LHA/WLM)
4. All locations with irrigation systems need to test and inspect the irrigation system and make a list of location of damaged heads, prior to the sprinkle contractor comes out to do the monthly repairs. Complete the repair list prior to the first week of May.
5. Continue power washing the hallways, awnings, sidewalks, dumpster pads, etc.
(Please EMAIL a list of completed buildings to the VP of Housing before the end of the month)
6. After asphalt repairs are completed, contact the VP of Housing to schedule additional sealing, coating and stripping.
7. Schedule landscape contractor for the installation of summer flower

Housing Manager

Date

Maintenance Staff

Date

June Preventative Maintenance

Property: _____

1. Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and commons areas (use the interior inspection report)
2. Inspect, and repair gutters and down spouts. Also check the installation of the splash blocks and fall of the extension pipes.
3. Inspect, (and repair as needed) the hot water tanks and Air handlers for leaks and temperature settings. Also clean the hot water tank by removing any settlement that might be on the bottom of the tanks.
4. For locations that may need hot water heater repaired, please obtain and submit 3-bids of contractors along with the June PM report.
5. Inspect (and repair as needed) the hallways for wear on the stair threads and loose floor tiles.
6. By the first week of the month all locations with irrigation systems need to test and inspect the sprinkler system and make a list of location of damaged heads, prior to the sprinkle contractor coming to the property.
7. Continue power washing the hallways, awnings, sidewalks, dumpster pads, etc.
8. Inspect all storm drains to ensure that they are free of any loose debris and trash

Housing Manager

Date

Maintenance Staff

Date

July Preventative Maintenance

Property: _____

1. Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and commons areas (use the interior inspection report)
2. Inspect, and clean A.C. units and change the A.C. filters
3. Update the properties inventory, i.e., office and maintenance equipment (submit the inventory list with the monthly PM report)
4. Inspect the roofs, awnings, gutters and porch overhangs.
5. By the first week of the month, all locations with irrigation systems need to test and inspect the sprinkler system
6. Continue power washing the hallways, awnings, sidewalks, dumpster pads, etc.
7. Inspect the exterior and repair (as needed) condensation lines.
8. Take the property truck for a routine maintenance check (i.e. oil change, and any other needed repairs)

Housing Manager

Date

Maintenance Staff

Date

August Preventative Maintenance

Property: _____

1. Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and common areas (use the interior inspection report)
2. Continue the power washing of the property
3. Inspect dumpsters and other enclosures (i.e. paint, install the dumpster slats)
4. By the first week of the month (before the service date), all locations with irrigation systems need to test and inspect the sprinkler system
5. Request and update schedule from the landscape contractor (submit with the monthly PM report)

Housing Manager

Date

Maintenance Staff

Date

September Preventative Maintenance

Property: _____

1. Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and commons areas (use the interior inspection report)
2. Schedule the landscaping contractor or in-house crew for the fall mulch and flowers
3. Inspect the parking lots and sidewalks for any needed repairs and incorporate them into the Plan for the following fiscal year.
4. Continue power washing the various needed areas throughout the community
5. By the first week of the month (before the service date), all locations with irrigation systems need to test and inspect the sprinkler system
6. Change the time on the time clock

Housing Manager

Date

Maintenance Staff

Date

October Preventative Maintenance

Preparing For the Fall Season

Property: _____

Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and commons areas (use the interior inspection report)

Company vehicle maintenance should be ready to include all of the following repairs

- change various fluid
- oil change
- tire rotation
- and any other repairs as needed

Prepare all A.C. heating systems by changing filters and ensuring that any HVAC materials and replacement parts are in stock.

Housing Manager

Date

Maintenance Staff

Date

November Preventative Maintenance

Property: _____

1. Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and commons areas (use the interior inspection report)
2. Clean out gutters and down spouts
3. Schedule an appointment with the landscaping crew to do the first level removal.
4. Call sprinkler contractor to check the sprinkler system (this only applies to properties with sprinkler systems)
5. Inspect, service and activate all heating systems

Housing Manager

Date

Maintenance Staff

Date

December Preventative Maintenance

Property: _____

1. Inspection and perform any repairs in all areas, storage rooms, buildings exteriors and commons areas (use the interior inspection report)
2. Inspect hot water tanks for temperature setting and leaks.
3. Schedule an appointment with the landscaping crew to do the second level removal and winter pruning.
4. Schedule a 2nd cleaning of the gutters prior to the landscaper starting the last level of removal.

Housing Manager

Date

Maintenance Staff

Date

LAKELAND HOUSING AUTHORITY AGENCY PLAN MEETING SIGN-IN SHEET

Project: Agency Plan 2023- Public Hearing-All

Meeting Date: 07/28/2022 8:30 AM

Facilitator: C. Pizarro An

Place/Room: LHA Conference Room

Name	Title	Site/Agency	Phone	Signature	E-Mail
Carlos Pizarro	SVP	LHA	863-797-9370		cpizarro@lakelandhousing.org
Edgardo U.	CFM	West Lake	863-687-2911		eduardo@lakelandhousing.org
Alfredo Machuca		West Lake	787-610-9399		
Walter Torres		West Lake	939-219-3914		
Pamela Rivera		West Lake	813-333-5675		
Rose Harte		West Lake	282-215-2442		
Jaime Velazquez		West Lake			
Alberto Spanna		West Lake	8130	ES	
Natalie Cruz			863-377-6083		
Alondra Baez		LHA			abaez@lakelandhousing.org
Billy Morris		Lha	(863) 308-9435		
Sheba Parker	HeV space	Central	863-687-2911 ext 146		sparker@lakelandhousing.org
Emili M. Delgado	HeV	Center	863-687-2911		emilym@lakelandhousing.org
Christel Candel	Asist manager.	Section 8	863-687-2911		10casio@lakelandhousing.org
MARICELI CARRETERO	inspector	LHA	787-714-7861		
Suzan McIntyre	FSPC	LHA-SS	x1017		smcintyre@lakelandhousing.org
Elexis Hunt	HeV	LHA-SEC 8	863-689-2911 ex. 1007		ehunt@lakelandhousing.org

LAKELAND HOUSING AUTHORITY AGENCY PLAN MEETING SIGN-IN SHEET

Project: Agency Plan 2023- Public Hearing-All

Meeting Date: 08/04/2022 8:30 AM

Facilitator: C. Pizarro An

Place/Room: LHA Conference Room

Name	Title	Site/Agency	Phone	Signature	E-Mail
Carlos Pizarro	SVP	LHA	863-797-9370		cpizarro@lakelandhousing.org
Emili Delgado	HCV	LHA	863-687-2911	<i>Emili Delgado</i>	emilym@lakelandhousing.org
Elexio Hurt	HCV	LHA	863-687-2911 Ex. 1007	<i>E. Hurt</i>	ehurt@lakelandhousing.org
Moraima Cabrera	HCV	LHA	863-687-2911 x1068	<i>M. Cabrera</i>	mcabrera@lakelandhousing.org
Suzan McIntyre	HCV	LHA	863-687-2911 x1017	<i>Suzan McIntyre</i>	smcintyre@lakelandhousing.org
Alondra Bacc	HCV	LHA	863-687-2911	<i>Alondra Bacc</i>	abacc@lakelandhousing.org
Sheba Parker	HCV	LHA	863-687-2911	<i>Sheba Parker</i>	sparker@lakelandhousing.org
Sendia Garcia	HCV	LHA		<i>Sendia Garcia</i>	sgarcia@lakelandhousing.org
Breisha Guzman	HCV	LHA	863-687-2911	<i>Breisha Guzman</i>	bguzman@lakelandhousing.org

Standard Operating Procedures 2022-23

I. Policy Statement

This policy defines the responsibilities of anyone who handles Housing Authority currency, cash equivalents, or checks (“Cash”). Departments or Properties that receive Cash or checks must have appropriate internal controls and follow documented procedures to ensure the good stewardship of these Housing Authority assets. In addition to preventing financial loss, these controls promote security and accurate financial reporting. Appropriate internal controls include the segregation of duties, safekeeping of Cash and Checks, prompt deposit of all Cash, checks and money orders receipts, and accurate recording of revenue into Housing Authority financial systems.

II. Who is Affected by this Policy

Anyone who handles Housing Authority Cash, checks and/or money orders (Credit Cards too). The **Director of Finance** is the policy contact person, and he/she is directly responsible for enforcing these rules.

III. Definitions

Automated Clearing House (ACH) Payment

The electronic transfer of money between checking or savings accounts via a communications network that uses the Federal Reserve banking system (Automated Clearing House).

Access to Banking information online

Access to online banking information is not permitted unless authorized by the Vice-President of Administration and/or the Executive Director.

Cash

Currency, cash equivalents or checks.

Cash Box

A locking box or container designed with compartments to secure coins and bills of different denominations.

Cash Equivalent

Money taking the form of a money order, travelers’ check, cashier check, or certified check.

Cash Handling Department

Any department that handles cash, cash equivalents, or checks.

Cash Management and Operations

Management of all Housing Authority cash flows by the Finance Department to accelerate the collection of receivables and manage cash flow and ensure availability of cash for operations.

Check

A negotiable demand draft on a bank to pay to the named party the indicated sum of money on a stated date or thereafter.

Currency

Ready money in the form of coin and bills.

Departmental Cash Handling Procedure

A documented cash handling plan that establishes, at a minimum, the internal controls named in this policy and its related procedures.

Electronic Funds Transfer (EFT)

The electronic exchange or transfer of money from one account to another through computer-based systems, either within a single financial institution or across multiple institutions.

Safe

A receptacle for the protected storage of currency, cash equivalents, or checks that has a combination or dual lock. In certain cases, a safe will have an alarm that is connected to the Housing Authority system.

Segregation of Duties

Process of safeguarding assets by assigning the acceptance of Cash receipts, recording, and reconciling of transactions to different individuals.

Wire Transfer

Electronic transfer of funds that typically settles the same day.

IV. Policy

Anyone who handles Housing Authority Cash has the responsibility to receive and process it according to this policy and its related procedures. In order to minimize Cash handling, the acceptance of debit cards is encouraged where technically feasible; and electronic funds transfers (ACH and wire transfers) should be used whenever possible for all non-point-of-sale and non-point-of-service payments to the Housing Authority.

Responsibility of Departments That Accept Cash

Any department that accepts Cash has a responsibility to:

- establish and document a Cash Handling Procedure that meets the minimum standards of this policy and its related procedures. However, departments may elect to be more specific or restrictive, as is appropriate for that departmental need.

- collect and record any transactions.
- be prepared to provide a receipt upon request. Or, if required within a specific Cash handling procedure, routinely provide a receipt.
- safeguard Cash assets against loss, theft, or misappropriation. **Leaving cash, checks or money orders in the open or on top of your desk or any surface will be considered a company violation.**
- deposit Cash promptly (Same day deposits are a must).

Departments or individuals are not authorized to receive gifts to the Housing Authority in the form of cash.

Internal Controls for Cash Handling Procedures

Establishing appropriate internal controls and documenting Cash handling procedures ensure the good stewardship of Cash assets and minimize the risk of loss. Before undertaking any new Cash handling operation or activity, approval for the activity must be received from the Vice-President of Administration or the Executive Director.

The set of basic Cash handling procedures supporting this policy is outlined below. These procedures define roles and responsibilities, explain how the operation or activity is accounted for, and instruct how deposits are made. For activities that extend beyond basic Cash handling procedures, departments should consult with the Director of Finance.

Minimum Procedural Requirements

Unless more restrictive controls are available, follow these minimum procedural requirements to promote security, appropriate stewardship of assets, and accurate financial reporting:

Segregation of Duties

To minimize the potential for mistakes or misappropriation of Cash, the segregation of Cash handling duties is required in departments handling Cash. The duties of collecting Cash, maintaining documentation, preparing deposits, and reconciling records should be distributed between two or more individuals.

In departments where the segregation of duties is not feasible, alternative and compensating controls may be implemented to achieve the desired objectives. Please contact the Director of Finance on how to establish appropriate controls for your area. Establishing clear accountability for the handling of Cash ensures that receipt is properly accounted for, the revenue is secured, and the revenue is traceable to specific handlers.

Securing Cash

Departments handling Cash are responsible for the safekeeping of these Housing Authority assets. Department Managers and Finance Coordinators should review the Cash receipt process, and **physical security** should be emphasized to every employee handling Cash.

The following measures promote a safe work environment and ensure secure handling of Cash.

- Restrict access to Cash to as few people as possible.

- **Lock Cash** (Checks) in a secure location that is appropriate for the amount of Cash on hand. Provide combinations and passwords only to authorized personnel.

Use this chart to provide the appropriate level of security for the amounts of currency on hand.

- Change combinations and passwords annually, and with any turnover of related personnel.
- Count Cash in a non-public, secure area that is **not easily visible** to others.
- Do not photocopy or scan checks, unless the Vice-President of Administration authorizes the procedures.
- This practice will enhance the security of private banking information.
- Please see Cash Collection, Deposits & Reconciliation for more information.

Prompt Deposit of Cash

Cash must be deposited promptly. If daily deposit of Cash is not practical, cash and checks must be placed inside a locked drawer or safe. For departments or properties that have specific

Compliance with this Policy

Failure to comply with the Housing Authority Cash and Check Handling Policy, and its related procedures, may result in disciplinary action and **possible involuntary termination**. Please see the Office of Human Resources Policies and Regulations for more on termination policies.