

**LAKELAND HOUSING AUTHORITY  
LAKELAND, FL (FL011)**

**MOVING TO WORK (MTW):  
COHORT # 4: ASSET BUILDING  
DRAFT PLAN**

**Please Submit Comments and Questions to:**

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**Released By:**

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**Issued: June 28, 2022**

**LAKELAND HOUSING AUTHORITY**

Moving to Work, Cohort # 4: Asset Building

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## LAKELAND HOUSING AUTHORITY

### Moving to Work (MTW) Cohort # 4: Asset Building

#### EXECUTIVE SUMMARY

Lakeland Housing Authority (LHA) is applying for MTW Cohort # 4: Asset Building Status. The LHA is remarkably well qualified to apply for MTW Cohort # 4: Asset Building. The LHA has invested heavily in its relationship with its residents over the years, including Family Self-Sufficiency (FSS), the ROSS Service Coordinator Program, and many other initiatives in support of residents.

MTW Cohort # 4: Asset Building provides Lakeland Housing Authority the opportunity to further build on its relationship with residents and support them in achieving financial independence. This Asset Building Cohort allows the LHA to benefit residents very directly: Selected residents from the Federal Conventional Public Housing Program (Section 9) will have the opportunity to have their monthly rent payments reported to between one and three of the National Credit Bureaus, unless they opt out, in order to build their credit profile for such things as home and car purchases (This is designated as Option # 2 in MTW Cohort # 4).

In applying for MTW, Cohort # 4: Asset Building Status, the LHA is simultaneously seeking the opportunity to participate in HUD's MTW Program. There are about 3,500 PHA's in the country. By the end of this round of selections, there will be about 140 PHA's officially designated as MTW agencies. These agencies are national leaders in using the Status to foment change and new opportunities. MTW agencies are freed up from many regulatory restrictions within the Section 8 and Section 9 Program, and they are provided flexibility in merging their financial accounts, such that they can do new and creative things locally, such as resident services and housing development. In return, HUD hopes to learn new ideas and efficiencies that it can then apply to all of the other Housing Authorities operating in the country.

Lakeland Housing Authority is very excited to be applying for this opportunity and for the possibility of further benefiting its residents while being a leader in housing.

#### INTRODUCTION

##### **a. MTW Opportunity**

In April of 2022, HUD published PIH Notice 2022-11 seeking applications for the Asset Building Cohort of the MTW Expansion. This cohort will test asset building initiatives, which for this cohort are defined as activities that encourage the growth of savings accounts and/or aim to build credit for assisted households. PHAs must submit completed applications by July 28, 2022.

##### **b. Background Information: Lakeland Housing Authority (LHA)**

###### **Agency Overview**

(To be added)

## **Lakeland Housing Authority Board of Commissioners**

- Don Brown, Chairman
- Shelly Asbury, Vice-Chairman
- Heena Gandhi
- Dewey Chancey
- Judy Mas
- David Samples
- Lorenzo Robinson
- Rev. Richard Richardson, Commissioner Emeritus

## **Resident Services**

The LHA provides both FSS and ROSS Service Coordinator Program services. They provide information, including newsletters, events, frequently asked questions, and more, for LHA residents and those who receive rental assistance from the Lakeland Housing Authority. Services offered by the LHA are designed to increase individual and family self-sufficiency, and to assist residents in becoming better educated. The LHA works to boost residents' self-image, and create stability through job training and placement, and enjoyable, educational programs.

## **LHA Public Housing Programs**

The Lakeland Housing Authority has the following Federal Conventional Public Housing Developments that will be included in the MTW Cohort # 4 Program:

- John Wright Homes
- West Lake Apartments
- Cecil Gober Villas
- Micro-Cottages at Williamstown
- Twin Lakes Estates Phase II

### **c. HUD and the Moving to Work Demonstration Program**

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW allows PHAs exemptions from many existing public housing and voucher rules and provides funding flexibility with how they use their Federal funds. PHAs in the MTW demonstration have pioneered a number of innovative policy interventions that have been proven to be successful at the local level, and subsequently rolled out to the rest of the country's PHAs. Currently, there are 109 MTW PHAs nationwide and HUD plans to expand the program to an additional 30 PHAs by 2022.

### **d. MTW Expansion and Cohort #4**

Over the past four years, HUD has added Housing Authorities to the MTW Program in the following three Cohorts: 1. MTW Flexibility for Smaller PHAs Cohort # 1; 2. Stepped and Tiered Rent Cohort # 2;

and 3. Landlord Incentives Cohort # 3. As indicated previously, in this round, HUD is adding additional Housing Authorities in Cohort # 4: Asset Building. Discussion of the four Cohorts follows:

- [MTW Flexibility for Smaller PHAs Cohort](#)

In October 2018, PHAs were [invited to submit letters of interest for this cohort](#), to evaluate the overall impact of MTW flexibilities on PHAs with less than 1,000 units. On August 28, 2020, HUD invited 33 of the PHAs that submitted letters of interest to submit full applications, after going through a robust public process. These eligible PHAs were selected through a geographic-based lottery. On January 7, 2021, HUD announced the selectees, which will formally be designated as MTW agencies once the agency signs and HUD executes their MTW Amendment to the Annual Contributions Contract (MTW ACC Amendment).

- [Stepped and Tiered Rent Cohort](#)

In March 2019, PHAs were [invited to submit letters of interest for this cohort](#), to study stepped and tiered rent alternatives. On August 28, 2020, HUD published [PIH Notice 2020-21](#) which invited 36 eligible PHAs that submitted letters of interest to work with their residents and communities to submit full applications by January 8, 2021. These applications were competitively reviewed, and in May 2021 HUD announced that 10 PHAs were selected.

- [Landlord Incentives Cohort](#)

In January 2021, HUD published [PIH Notice 2021-03](#) to invite PHAs to submit applications for this cohort, to evaluate landlord incentives and their effect on landlord participation in the HCV program. PHAs in this cohort of the MTW Expansion must implement at least two MTW landlord incentive activities from a provided list of MTW landlord incentive activities. In January of 2022, [HUD announced the 29 PHAs](#) that were selected through this cohort.

- [Asset Building Cohort](#)

In April of 2022, HUD published [PIH Notice 2022-11](#) seeking applications for the Asset Building Cohort of the MTW Expansion. This cohort will test asset building initiatives, which for this cohort are defined as activities that encourage the growth of savings accounts and/or aim to build credit for assisted households. PHAs must submit completed applications by July 28, 2022.

With reference to the expansion of the MTW Program starting 6 years ago, HUD stated that it was thrilled to announce that the first forty-one (41) agencies, representing communities across the nation, had been selected for the expansion of the MTW Demonstration Program.

HUD understands the importance of thinking outside the box, focusing on best practices and providing creative housing solutions for those serving the most vulnerable by allowing agencies to merge their funding streams and design creative policies. The most important lesson HUD has learned from MTW is that local agencies and their stakeholders are in the best position to assess the needs and challenges of their communities and rental markets. It is important that local leaders have the flexibility to utilize and leverage their strengths, resources and partnerships in a way that best serves their communities.

The key principles for the expansion are to: simplify, learn, and apply. The vision for the MTW expansion is to learn from MTW interventions in order to improve the delivery of federally assisted housing and promote self-sufficiency for low-income families across the nation. In order to do this, HUD has

developed a program delivery model that simplifies and streamlines HUD oversight and provides flexibility to high-performing PHAs in the delivery of housing services.

#### **MTW Cohort # 4: Asset Building**

MTW Cohort # 4: Asset Building is an exceedingly important matter for study for HUD and housing in the United States. For HCV and Public Housing residents to have options beyond subsidized housing, they need savings accounts and good credit references. This is the point of Cohort # 4: Asset Building.

Within Cohort # 4, there are three Option from which Applicants must select:

1. **Opt-Out Savings Accounts Option:** Under this option, the PHA would create an “opt-out” savings program to deposit a set amount of funds from HCV Housing Assistance Payment (HAP) or Operating Fund funding each month into an escrow account for the benefit of an assisted household. PHAs may also choose to supplement the savings program with other private and/or public funding sources. After one year, the assisted household would then have access to these funds.
2. **Credit Building Option:** Under this option, the PHA would report the public housing rent payments of public housing households that enroll in the program through an informed consent process to one or more credit bureaus with the goal of building credit for those households.
3. **PHA-Designed Asset Building Option:** As stated earlier, for purposes of this Notice, Asset Building Initiatives are defined as activities that encourage the growth of savings accounts and/or aim to build credit for assisted households. Under this option, the PHA would design a local asset building program to further one, or both, of these goals. PHAs should tie the PHA-Designed Asset Building Option to one or more of the following: activities requiring MTW statutory or regulatory flexibility, MTW funding flexibility, and/or building credit. If a PHA seeks to implement both the Opt-Out Savings Account Option described in Section 3(A) of this Notice and the Credit Building Option described in Section 3(B) of this Notice, it should apply under this PHA-Designed Asset Building Option.

#### **Lakeland Housing Authority and MTW Cohort # 4: Asset Building**

In implementing MTW Cohort # 4: Asset Building, Lakeland Housing Authority will apply HUD’s key principles for the expansion to: simplify, learn, and apply. As with all other PHAs, LHA has had to operate in an environment where intervening and having the resources to work effectively with residents has been nebulous. Working with HUD, its MTW advisers and with HUD’s assigned Technical Assistance experts, the LHA will establish an ideal environment in encouraging and supporting residents to partner with the LHA for a great housing and financial experience.

Lakeland Housing Authority brings a unique and comprehensive perspective to the table. The LHA has worked hard on its relationships with its residents who live in leased housing, its residents who live in Conventional Federal Public Housing, and with its applicants.

The LHA intends to use this MTW Application Process and the opportunity to function as an MTW agency to further support its residents in their efforts at Asset Building.

#### **MTW Cohort # 4: Asset Building Selection Process**

PHAs interested in the fourth cohort of the MTW Expansion are required to submit an MTW Plan and application package to HUD under this Notice by the submission deadline of July 28, 2022. HUD will screen each MTW Plan and application package received to verify eligibility according to the date and requirements in this Notice. HUD will then assess all eligible MTW Plan and application packages for completeness.

A lottery of all eligible and complete MTW Plan and application packages will be conducted to determine which PHAs will be selected and offered MTW designation under the fourth cohort of the MTW Expansion. Following the lottery process, HUD will notify all applicants about the outcome of the lottery. After HUD has made selections, if a selected applicant PHA declines to participate in the fourth cohort of the MTW Expansion, HUD may randomly select another eligible and complete MTW Plan and application package.

Selection does not constitute formal entry into the MTW Demonstration Program. Selected PHAs may not flexibly use Section 8 and Section 9 funding or invoke any MTW flexibility before formal entry into the MTW Demonstration Program. This will not occur until an MTW Amendment to the Annual Contributions Contract (ACC) detailing MTW participation is executed by both HUD and the PHA and any other requirements of the MTW Operations Notice are met.

## LAKELAND HOUSING AUTHORITY

### Moving to Work, Cohort # 4

#### Part I: MTW PLAN

##### a. Vision for the Local MTW Program

The LHA seeks to establish and constantly explores new opportunities to partner with other communities and agencies to expand additional affordable housing opportunities.

The LHA will use the additional resources and regulatory and budget flexibility that comes with MTW status to further improve the LHA's Housing Programs, including both HCV's and Conventional Federal Public Housing. Along with further developing resident services, the LHA will continue its efforts to develop much-needed housing for low income, elderly, non-elderly disabled, homeless, veteran and family populations.

Lakeland Housing Authority seeks to manage and operate an effective Housing Choice Voucher Program that provides the benefit of better housing options to its qualified HCV residents. In order to accomplish this, Lakeland Housing Authority is always making substantial efforts to improve technology, customer service and communication with its residents to enhance opportunities.

In support of this, Lakeland Housing Authority is applying to HUD for selection as a MTW Cohort # 4: Asset Building. Lakeland Housing Authority is uniquely positioned to work very effectively with HUD in this endeavor.

As a MTW Cohort # 4: Asset Building Housing Authority, Lakeland Housing Authority will continue to enact policies and procedures that will build strong relationships with residents and resident organizations, provide housing choice for qualifying HCV tenants, and support tenants and their families in achieving self-sufficiency.

##### Lakeland Housing Authority, Housing Team

As already indicated, Lakeland Housing Authority has assembled an outstanding team perfectly suited to working with HUD on the MTW Cohort # 4: Asset Building Program.

##### b. Plan for Future Community/Resident Engagement

###### RESIDENT ENGAGEMENT

Lakeland Housing Authority will continue to engage assisted households in its low- income and affordable housing programs, as well as the broader community and stakeholders, in the implementation and development of its local MTW program. The LHA works closely with its Resident Advisory Board (RAB) regarding all needs and concerns pertaining to LHA residents. As indicated previously, the LHA operates an effective FSS Program and a ROSS Service Coordinator Program.

As Lakeland Housing Authority does in all of its programs, as a MTW Cohort # 4 designee, Lakeland Housing Authority will continue with its entire engagement efforts with the local community,



including outreach to racial and ethnic minorities, persons with limited English proficiency, persons with disabilities, families with children and groups representing such persons.

The LHA will work closely with its Resident Advisory Board in the implementation of MTW generally, and with respect to the Cohort # 4 requirements, to make sure all needs and concerns pertaining to LHA residents are addressed.

### **COMMUNITY ENGAGEMENT**

The LHA works closely with a broad array of community organizations in support of its residents. Referrals for training and services are often made to community-based agencies with specialized skills and experience.

#### **c. Plan for Local MTW Program**

Lakeland Housing Authority's MTW Cohort # 4: Asset Building planning has taken place in the context of what the Housing Authority has systematically done over the years to make things work effectively with residents.

In operating MTW Cohort # 4, the LHA will set up all of the communications and systems necessary for it to operate effectively. LHA will work closely with HUD in all actions and communications.

To facilitate technological solutions, better customer service and better communications, Lakeland Housing Authority is working at implementing effective strategies, including the necessary additions to the LHA's computer management systems.

Specific initiatives to be implemented include:

- Ensuring a housing software system that supports the program and the MTW Cohort # 4: Asset Building initiative
- System to provide highly accurate information to the credit bureaus on a timely basis.

The LHA is fully compatible with HUD's Fair Housing and Civil Rights Initiatives

#### **d. Proposed Use of MTW Funds**

Lakeland Housing Authority will use all resources and where appropriate, fungibility to enhance housing and program opportunities for its residents and will use the MTW Cohort # 4: Asset Building status as a way to provide top level housing resources in coordination with an expanded and satisfied array of landlords.

As necessary, Lakeland Housing Authority will work with HUD identified Technical Assistance contractors to determine the best strategy with reference to Waivers and Safe Harbors. Along with the Waivers required in tandem with the Activities Lakeland Housing Authority ends up selecting,

## LAKELAND HOUSING AUTHORITY

### Moving to Work, Cohort # 4

#### Part II: MTW PLAN

**a. MTW Cohort # 4: Asset Building Activities selected by the LHA**

The LHA will use its participation and designation as an MTW agency to provide leadership and new ideas concerning local management and use of resources. MTW Cohort # 4: Asset Building provides Lakeland Housing Authority the opportunity to further build on its relationship with residents and support them in achieving financial independence. This Asset Building Cohort allows the LHA to benefit residents from the Federal Conventional Public Housing Program (Section 9) the opportunity to have their monthly rent payments reported to between one and three of the National Credit Bureaus, unless they opt out, in order to build their credit profile for such things as home and car purchases. (This is designated as Option # 2 in MTW Cohort # 4).

In applying for MTW, Cohort # 4: Asset Building Status, the LHA is simultaneously seeking the opportunity to participate in HUD's MTW Program. There are about 3,500 PHA's in the country. By the end of this round of selections, there will be about 140 PHA's officially designated as MTW agencies. These agencies are national leaders in using the Status to foment change and new opportunities. MTW agencies are freed up from many regulatory restrictions within the Section 8 and Section 9 Program, and they are provided flexibility in merging their financial accounts, such that they can do new and creative things locally, such as resident services and housing development. In return, HUD hopes to learn new ideas and efficiencies that it can then apply to all of the other Housing Authorities operating in the country.

**b. Other Resident Initiatives to be Considered by the LHA**

Working in close coordination with HUD and the contractors assigned to this Cohort, the LHA will seek to develop additional resident initiatives to be implemented in coordination with this effort.