



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

Lakeland Housing Authority  
**5-YEAR PHA Plan**  
Fiscal Years 2020-2024

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

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

**Re: Resolution # (19-XXXX)**

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: HOUSING AUTHORITY OF THE CITY OF LAKELAND

B. Project: Approval of the LHA's 5-Year Agency Plan for fiscal year 2020-2024 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, Tenant Selection Plan, Limited English Proficiency Plan (LEP/LAP), Analysis of Impediments, Family Self-Sufficiency Plan, Voluntary Conversion, Demolition and Development activity and signing the *Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, and form 50075-5Y.*

C. Originator: Carlos Pizarro

**3. Cost Estimate:**

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

**Narrative:**

The Board of Commissioners of a Public Housing Agency is required to approve a resolution for the 5-Year PHA Plan and authorizes the Chair to sign forms related to the 5-Year PHA Plan. LHA's 5-Year Agency Plan for fiscal year 2020-2024 includes but is not limited to the Capital Funds Plans and Budgets, Administrative Plan for the Housing Choice Voucher, the ACOP for the Public Housing Program, Tenant Selection Plan, Limited English Proficiency Plan (LEP/LAP), Analysis of Impediments, Family Self-Sufficiency Plan, Voluntary Conversion, Demolition and Development activity and signing the Form HUD 50077-SL, 50077-CR, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, and form 50075-5Y. It also authorizes the Executive Director to have staff submit the form to the U.S. 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 50077-CR and to direct the Executive Director of the Housing Authority of the City of Lakeland to submit the signed forms and completed 5-Year PHA Plan to the U.S. Department of Housing and Urban Development.

**Attachment:**

- *LHA's 5-Year Agency Plan for fiscal year 2020-2024 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, Tenant Selection Plan, Limited English Proficiency Plan (LEP/LAP), Analysis of Impediments, Family Self-Sufficiency Plan, Voluntary Conversion, Demolition and Development activity and signing the Form HUD 50077-SL, 50077-CR, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, and form 50075-5Y.*

## ***5-Year 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 Staff, Board of Commissioners, RAB and the City of Lakeland to involve key stakeholders in the 5-Year PHA Planning 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 will be held at the LHA Administration building.

The process to develop LHA's 5-Year 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.

**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

**A. PHA Information**

A.I PHA Name: Housing Authority of the City of Lakeland PHA Code: FL011

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 12/2019  
 PHA Plan Submission Type:  5-Year Plan Submission  Revised 5-Year Plan Submission

**Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The 5-Year PHA Plan will be available at the following locations:

Housing Authority of the City of Lakeland  
 430 Hartsell Avenue  
 Lakeland, FL 33815

All the properties and locations within the Housing Authority of the City of Lakeland portfolio.

Housing Authority of the City of Lakeland's website: <https://lakelandhousing.org/>

City of Lakeland Community Redevelopment Agency  
 228 South Massachusetts Avenue  
 Lakeland, FL 33801

City of Lakeland – Public Library  
 Larry R. Johnson Branch Library  
 1700 North Florida Avenue  
 Lakeland, FL 33805

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

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

|            |  |
|------------|--|
| <b>B.</b>  | <b>5-Year Plan.</b> Required for all PHAs completing this form.  |
| <b>B.1</b> | <p><b>Mission.</b> State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.</p> <p>The mission of the Housing Authority of the City of Lakeland (HAACL), 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.</p>  |
| <b>B.2</b> | <p><b>Goals and Objectives.</b> Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</p> <p>Goal 1: Increase the number of affordable housing units by at least 30%.</p> <p>Goal 2: Maintain the high performing status in Public Housing and Section 8.</p> <p>Goal 3: Maintain and improve our public image through enhanced communication, coordination, and accountability with outside entities, among the staff and with residents.</p> <p>Goal 4: Be the premier innovative and effective affordable housing provider in Florida.</p> <p>Goal 5: Increase and encourage the self-sufficiency efforts of all residents.</p> <p>Goal 6: Maintain a high level of employee relations and morale.</p> |

**B.3**

**Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

The Housing Authority of the City of Lakeland provides the following progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

**Goal 1:** Increase the number of affordable housing units by at least 30%.

We were awarded LIHTC to begin demolition of 25 Public Housing units and start construction of 100 Senior units. Additionally, the Williamstown Community (48 Public Housing units will be added) was approved and it is under construction.

**Goal 2:** Maintain the high performing status in Public Housing and Section 8.

We were designated a High Performer Agency for Public Housing and Section on the most recent evaluation.

Maintain a public housing vacancy rate of 2% or less. LHA has been able to maintain the vacancy at or below 2%. Maintain an average work order response time of less than three days. Collect at least 97% 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, 2019.

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.

Develop and build 48 Near Elderly (Over 55) Public Housing Units in the Williamstown 3 acres vacant lot using the HOPE VI grant, which allowed LHA to close out the HOPE VI grant by December 30, 2018. 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 and build new communities in all LHA owned land or parcels and re-develop the West Lake Apartments community, John Wright Homes, Carrington Place and Renaissance at Washington Ridge.

Assist at least 7 families into homeownership through the Public Housing Homeownership Program, the HOPE VI Program, or other programs by December 31, 2018.

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 \$100 million in grants and/or leveraging from all sources by December 31, 2019.

**Goal 5:** Increase and encourage the self-sufficiency efforts of all residents.

Increase the usage of LHA educational and computer literacy programs by 25% by December 31, 2019. Substantially increase the number of LHA seniors and people with disabilities using LHA sponsored programs by December 31, 2019.

**Goal 6:** Maintain a high level of employee relations and morale.

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.

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.



### **Section B.3 - HUD-50075-5Y: New Activities Supporting Goals**

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 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; acquisition and development of new units in, around and outside of LHA properties; and wholesale redevelopment of its public housing communities.

LHA was granted Low Income Housing Tax Credits to develop a 100-unit's community (Phase 1) in 2016; this community will replace approximately 25 units of existing Public Housing units located within the West Lake Apartments community (AMP-1). Additionally, LHA applied and was granted additional Low-Income Housing Tax Credits (LIHTC) for Phase 2 to develop 132 units, in order to develop Phase 2, 64 existing units will be disposed and demolished. The Agency is planning to apply for more LIHTC for Phase 3 to replace the remaining units located within the West Lake Apartments community. 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).

In an effort 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 on-call architectural and engineering firms on the following options for closeout of the grant:

**Micro-Cottages:** The authority has developed 48 affordable housing units and a community building with a combination of RHF funds from FY 2009 – 2014 and/or HOPE VI funds.

**Cecil Gober Modernization:** This community consists of 37 near elderly/senior units. The GPNA that was performed for the site supports modernization of the site. As part of the modernization, LHA is seeking to correct deficiencies outlined by the GPNA as well as reconfigure the units so the seniors living within the community can age in place. The agency is fixing the irrigation system.

**Renaissance Tenth Street Lot:** LHA sold and disposed of the 4.33-acres of land at the intersection of N. Florida Avenue and W. Tenth Street to a third-party developer. The sales proceeds will be used to develop, acquire, and/or modernize affordable housing units at properties owned and/or controlled by LHA or its affiliates.

West Lake Apartments (Second and 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. First Phase is under construction.

Any balance of remaining Second Increment RHF funds received to date, along with future RHF 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.

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). CFFP/RAD involves borrowing against future flow of annual Capital Funds.

LHA plans to pursue public housing 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.

The Authority intends to use Capital Funds and other public and private funds to redevelop existing family and elderly developments. LHA will either self-develop or partner with a master developer for Westlake Apartments or other (s) site (s) and conduct a community engagement process to arrive at a master plan for redevelopment.

LHA will also start self-developing and operating affordable housing. Some of the proposed self-developing project will either be located on the 10.56-acre site located on W. 10th Street or at the 17.06-acre site at Hunter field PUD (Arbor Manor) or at the John Wright Homes or Washington Ridge vacant lots. LHA also intends to use Capital Funds and other funds to acquire and redevelop properties in and around its public housing communities.

### **Demolition and/or Disposition**

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, the West Lake Apartments disposition 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.

LHA will include the vacant lots in this process as well. Specifically, LHA plans to submit a disposition application for the 17.3-acre tract within the Hunter field Planned Unit Development and the land located on the 10.56-acre site on W. 10th Street and the John Wright Homes or Washington Ridge vacant lots. The sales 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.

### **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.

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 a 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.

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 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. Furthermore, LHA is considering under the LHA may project-base units within the Carrington Place Development project.

LHA plans to utilize project-based vouchers for up to 80 units within the final phase of the West Lake Apartments Low Income Housing Tax Credit project.

|            |  |
|------------|--|
| <b>B.4</b> | <p><b>Violence Against Women Act (VAWA) Goals.</b> Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>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.5

**Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

In accordance with HUD regulations in 24 CFR 903.7 and 24 CFR 905.3, the Housing Authority of the City of Lakeland defines below the criteria that will be used for determining substantial deviation from its 5-year plan; significant amendment or modification to the 5-year and Annual Plan; and significant amendment or modification to the Capital Fund Program 5-year Action Plan. Prior to implementing changes that meet such criteria, LHA will submit for HUD approval, a revised Plan(s) that meets full public process requirements including Resident Advisory Board review and consultation.

Housing Authority of the City of Lakeland's criteria as defined below, is applicable to all CFP components including Capital Fund grants; Replacement Housing Factor (RHF) grants; Disaster grants; Capital Fund Financing Program (CFFP) allocations; as well as any new or future formula components such as Demolition and Disposition Transitional Funding (DDTF).

Criteria for defining "Substantial Deviation" from the 5-year plan:

- A major change in the direction of Housing Authority of the City of Lakeland pertaining to its mission and goals would constitute a "substantial deviation" from the agency's 5-year plan.
- Examples include undertaking new program activities, development strategies or financing initiatives that do not otherwise further Housing Authority of the City of Lakeland's stated mission and goals as articulated in the 5-year plan

Criteria for defining "Significant Amendment or Modification" to the 5 year and Annual Plan:

- Changes to rent, admission policies, or organizational of the waiting list(s) in the Public Housing Program that will impact more than 10% of applicants and/or households assisted under the program.
- Changes to rent, admission policies, or organizational of the waiting list(s) in the Housing Choice Voucher Program that will impact more than 10% of applicants and/or households assisted under the program.
- Substantial changes to demolition, disposition, designated housing, homeownership, or conversion activities identified in the current HUD-approved Annual or 5-year Plans.

Criteria for defining "Significant Amendment or Modification to the Capital Fund Program (CFP) 5-year Action Plan:

- Proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed finance proposals will be considered significant amendments to the CFP 5-year Action Plan.
- Additions of non-emergency work items not included in the current CFP Annual Statement of CFP 5-Year Action Plan that exceeds the agency procurement threshold amount.

Exceptions:

- Changes under the above definitions that are required due to HUD regulations, federal statutes, state or local laws/ordinances or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment /modification.

|            |   |
|------------|---|
|            | <ul style="list-style-type: none"> <li>Changes under the above definitions which are funded by source other than federal funds will not require Plan amendment or modification.</li> </ul>  |
| <b>B.6</b> | <p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N<br/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> |
| <b>B.7</b> | <p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD 50077-SL</u>, <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>   |

## Instructions for Preparation of Form HUD-50075-5Y 5-Year PHA Plan for All PHAs

### A. PHA Information 24 CFR §903.23(4)(e)

**A.1** Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

### B. 5-Year Plan.

**B.1 Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR §903.6(a)(1))

**B.2 Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR §903.6(b)(1)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

**B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR §903.6(b)(2))

**B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR §903.6(a)(3))

**B.5 Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

#### B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide comments?

(b) If yes, submit 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 §903.17(a), 24 CFR §903.19)

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 PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 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.

**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 2/29/2016

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

I, William "Bill" Mutz, the Mayor  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Housing Authority of the City of Lakeland  
*PHA Name*

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of  
Impediments (AI) to Fair Housing Choice of the

City of Lakeland  
*Local Jurisdiction Name*

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State  
Consolidated Plan and the AI.

The 5-Year PHA Plan outlines ways to create affordable rental housing and homeownership opportunities  
for moderate-, low-, and very low-income families and individuals in a manner that is consistent with the  
goals and objectives of the 2015-2020 Consolidated Plan and the 2015 Analysis of Impediments to Fair  
Housing as well as the efforts of the Affordable Housing Advisory Committee for the City of Lakeland.

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 Authorized Official | Title |
| William "Bill" Mutz         | Mayor |
| Signature                   | Date  |



**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 02/29/2016

**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 Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the 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, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Housing Authority of the City of Lakeland

FL011

\_\_\_\_\_  
PHA Name

\_\_\_\_\_  
PHA Number/HA Code

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 Authorized Official: Michael Pimentel

Title: Chairman

Signature

Date



U. S. Department of Housing and Urban Development  
Jacksonville Field Office  
Charles Bennett Federal Building  
400 West Bay Street  
Suite 1015  
Jacksonville, Florida 32202-4410

April 22, 2019

Mr. Benjamin Stevenson  
Executive Director  
Lakeland Housing Authority  
P.O. Box 1009  
Lakeland, FL 33802-1009

Dear Mr. Stevenson:

We have calculated the Final Score on your Section 8 Management Assessment Program (SEMAP) Certification for the Fiscal Year Ending December 31, 2018. We appreciate your time and attention to the SEMAP assessment process. SEMAP enables HUD to better manage the Section 8 tenant-based program by identifying PHA capabilities and deficiencies related to the administration of the Section 8 program. As a result, HUD will be able to provide more effective program assistance to PHAs.

The Lakeland Housing Authority earned 135 points out of a possible 145 points resulting in an Overall Score of 93%. The following are your scores for each indicator:

|              |                                  |    |
|--------------|----------------------------------|----|
| Indicator 1  | Selection from Waiting List      | 15 |
| Indicator 2  | Reasonable Rent                  | 15 |
| Indicator 3  | Determination of Adjusted Income | 15 |
| Indicator 4  | Utility Allowance Schedule       | 0  |
| Indicator 5  | HQS Quality Control              | 5  |
| Indicator 6  | HQS Enforcement                  | 10 |
| Indicator 7  | Expanding Housing Opportunities  | 5  |
| Indicator 8  | Payment Standards                | 5  |
| Indicator 9  | Timely Annual Reexaminations     | 10 |
| Indicator 10 | Correct Tenant Rent Calculations | 5  |
| Indicator 11 | Pre-Contract HQS Inspections     | 5  |
| Indicator 12 | Annual HQS Inspections           | 10 |
| Indicator 13 | Lease-Up                         | 15 |
| Indicator 14 | Family Self-Sufficiency          | 10 |
| Indicator 15 | Deconcentration Bonus            | 0  |

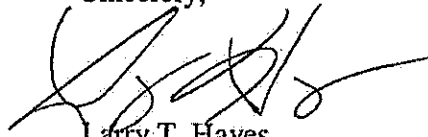
Your overall rating is "High" on your SEMAP certification for FY 2018, and we congratulate you for your outstanding performance.

We have recorded that your PHA has been rated zero on Indicator 4. Please take the necessary corrective actions to ensure compliance with program rules. For the zero rating on this indicator, you must send this Office a written report describing the corrective actions taken within 45 calendar days of the date of this letter or a written corrective action plan may be required.

SEMAP Indicator 4 (Utility Allowance Schedule) requires that the PHA to maintain an up-to-date utility allowance schedule in accordance with 24 CFR 982.517.

Thank you for your cooperation with the SEMAP process. If you have any questions, please contact Chad E. Nabors, at (904) 208-6040, or by e-mail at [Chad.E.Nabors@hud.gov](mailto:Chad.E.Nabors@hud.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Larry T. Hayes", with a long horizontal flourish extending to the right.

Larry T. Hayes

Director

Office of Public Housing



**U.S. Department of Housing and Urban Development**

OFFICE OF PUBLIC AND INDIAN HOUSING  
REAL ESTATE ASSESSMENT CENTER

**Public Housing Assessment System (PHAS) Score Report for Interim Rule**

Report Date: 06/24/2019

|                  |   |
|------------------|---|
| PHA Code:        | FL011                                     |
| PHA Name:        | HOUSING AUTHORITY OF THE CITY OF LAKELAND |
| Fiscal Year End: | 12/31/2018                                |

| PHAS Indicators            | Score                     | Maximum Score |
|----------------------------|---------------------------|---------------|
| Physical                   | 29                        | 40            |
| Financial                  | 25                        | 25            |
| Management                 | 25                        | 25            |
| Capital Fund               | 7                         | 10            |
| Late Penalty Points        | 0                         |               |
| <b>PHAS Total Score</b>    | <b>86</b>                 | <b>100</b>    |
| <b>Designation Status:</b> | <b>Standard Performer</b> |               |
| Published 04/08/2019       | Initial published         | 04/08/2019    |

| Financial Score Details  | Score | Maximum Score |
|--|-------|---------------|
| Unaudited/Single Audit   |       |               |
| 1. FASS Score before deductions                                | 25.00 | 25            |
| 2. Audit Penalties   | 0.00  |               |
| Total Financial Score Unrounded (FASS Score - Audit Penalties) | 25.00 | 25            |

| Capital Fund Score Details                                   | Score | Maximum Score |
|--|-------|---------------|
| Timeliness of Fund Obligation:                               |       |               |
| 1. Timeliness of Fund Obligation %                           | 90.00 |               |
| 2. Timeliness of Fund Obligation Points                      | 5     | 5             |
| Occupancy Rate:  |       |               |
| 3. Occupancy Rate %  | 95.83 |               |
| 4. Occupancy Rate Points                                     | 2     | 5             |
| Total Capital Fund Score (Fund Obligation + Occupancy Rate): | 7     | 10            |

Notes:

1. The scores in this Report are the official PHAS scores of record for your PHA. PHAS scores in other systems are not to be relied upon and are not being used by the Department.
2. Due to rounding, the sum of the PHAS indicator scores may not equal the overall PHAS score.
3. "0" FASS Score indicates a late presumptive failure. See 902.60 and 902.92 of the Interim PHAS rule.
4. "0" Total Capital Fund Score is due to score of "0" for Timeliness of Fund Obligation. See the Capital Fund
5. PHAS Interim Rule website - <http://www.hud.gov/offices/reac/products/prodphasinrule.cfm>



U. S. Department of Housing and Urban Development  
Jacksonville Field Office  
Charles Bennett Federal Building  
400 West Bay Street  
Suite 1015  
Jacksonville, Florida 32202-4410

December 18, 2018

Mr. Benjamin Stevenson  
Executive Director  
Lakeland Housing Authority  
430 Hartsell Avenue  
Lakeland, FL 33815

Dear Mr. Stevenson:

This letter is to inform you that the Lakeland Housing Authority's (LHA's) Annual Agency Plan (Plan) submission for the fiscal year beginning January 1, 2019, is approved. This conditional approval of the Plan does not constitute an endorsement of the strategies and policies outlined in the Plan. In providing assistance to families under programs covered by this Plan, the LHA will comply with the rules, standards, and policies established in its approved Plan, as provided in 24 CFR Part 903 and other applicable regulations. Your approved Plan and all required attachments and documents must be made available for review and inspection at the principal office of the PHA during normal business hours.

Should you have any questions regarding the LHA's Plan or the information in this letter, please contact Georgia Walton, Portfolio Management Specialist, at (904) 208-6006, or Robert Caravello, Facilities Specialist at (904) 208-6081, or via E-mail at [georgia.walton@hud.gov](mailto:georgia.walton@hud.gov) or [robert.caravello@hud.gov](mailto:robert.caravello@hud.gov) respectively.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Uche A. Oluku".

Uche A. Oluku, PhD  
Acting Director  
Office of Public Housing



U. S. Department of Housing and Urban Development  
Jacksonville Field Office  
Charles Bennett Federal Building  
400 West Bay Street  
Suite 1015  
Jacksonville, Florida 32202-4410

April 25, 2019

Mr. Benjamin Stevenson  
Executive Director  
Lakeland Housing Authority  
430 Hartsell Avenue  
Lakeland, FL 33815

Dear Mr. Stevenson:

This is in reference to the Lakeland Housing Authority's (LHA's) Annual Plan Attachment No. 1-2019, Criteria for Substantial Deviation and Significant Amendment, received on April 24, 2019.

Enclosed please find a signed copy of the amendment to include as part of the LHA's Tenant Selection Plan for Twin Lakes Estates – Phase I and II.

Should you have any questions or require additional assistance, please do not hesitate to contact Georgia Walton, Portfolio Management Specialist, at (904) 208-6006 or via E-mail at [georgia.walton@hud.gov](mailto:georgia.walton@hud.gov)

Sincerely yours,

A handwritten signature in black ink, appearing to read "Larry T. Hayes".

Larry T. Hayes  
Director  
Office of Public Housing

**Annual Plan Attachment No. 1-2019**

**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 HA. The HA will consider the following actions as a Significant Amendment or Modification to the Five-Year Plan and/or Annual Plan:

- Tenant Section Plan for **TWIN LAKES ESTATES - PHASE I and II**
- This amendment (s) was/were be posted for 45 days starting on February 1, 2019

We will attached the Tenant Selection Plan for Phase I and II to the 2019 Approved ACOP for Public Housing and the Administrative Plan as required. And the new language is as follow:

Properties that have contracts with HUD Multifamily rental assistance programs and/or PHAs that administer public housing and also have the Florida Housing Link requirement must handle their waiting list to reflect both HUD and Florida Housing requirements. In order to do this, Florida Housing has determined that establishing an owner-adopted preference with a partnering organization is the correct method for complying with Florida Housing and HUD requirements. This is referenced in the RFA under which the property and the extremely low-income units Special Needs units were funded, RFA 2015-112. this RFA states on Page 29 in Section Four, 7.b.(2)(b):

In addition, for properties that have a Housing Assistance Payment Contract and/or an Annual Contributions Contract with HUD, but are not HUD Section 202 or HUD Section 811, the Applicant shall establish an owner-adopted preference in the admission policies for the Development, allowing the Applicant to create a preference or limited preference specifically for individuals or families who are referred by a partnering service agency. The partnering service agency must be a designated Special Needs Household Referral Agency in the county where the Development is located.

This information is also included in the MOU on Page 2, Section 5. Owner's Responsibilities, 5.(b) (c).

**Special Admissions**

Florida Housing Finance Corporation requires a set-aside for X extremely-low income units at Twin Lakes Estates for "Special Needs Households". The Lakeland Housing Authority will work with the Referral Agency Peace Rivers and will admit such families whether or not they are on the waiting list, and, if they are on the waiting list, without

considering the family's position on the waiting list. These families are considered non-waiting list selections. The Lakeland Housing Authority will maintain records showing that such families were admitted with special program funding.

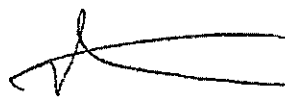
**B. Applying Preferences and Income Targeting Requirements**

**Waiting List Preferences**

**Special Needs** – In order to meet the minimum FHFC requirements, individuals or families referred by a partnering service agency who meet the definition of Persons with a Disabling Condition as stated in Florida Statute 420.0004(7) and meaning a diagnosable substance abuse disorder, serious mental illness, developmental disability, or chronic physical illness or disability, or the co-occurrence of two or more of these conditions, and a determination that the condition is:

- (a) Expected to be of long-continued and indefinite duration; and
- (b) Not expected to impair the ability of the person with a disabling condition.


In filling vacant units, after the FHFC Special Needs requirement is met, Management shall then proceed to follow the standard selection process as described in this Tenant Selection Plan. If a vacancy occurs which results in the total number of occupied Special Needs units falling below the required minimum, Management will then choose the next applicant from the waiting list designated for applicants referred by the partnering service agency. It is understood that the units utilized to meet the Special Needs set-aside requirement will not be predetermined; the units will be floating units. If at the time of vacancy there are no applicants on the Special Needs waiting list and the holding period required for the partnering service agency has been met, Management is then allowed to follow the standard selection process as described in this Tenant Selection Plan. When the next vacant unit becomes available Management will once again attempt to fulfill the Special Needs set-aside. This process will continue until once again the required number of units allocated to the special needs set-aside have been occupied by applicants who meet the Special Needs qualifications.



Signature of the Executive Director

4/24/2019

Date



Signature of Public Housing Director

4/25/2019

Date



**NOTICE OF PUBLIC MEETINGS AND PUBLIC HEARING**  
**Lakeland Housing Authority**  
**FY 2018 Agency Plan Amendment No. 2-2019**  
**Substantial Deviation and Significant Amendments**

The Lakeland Housing Authority (LHA) has scheduled one public meetings on its FY 2018 Agency Plan Substantial Deviation and Significant Amendment No.2-2019 with the Resident Advisory Board and the general public at 9:00 a.m. on each July 3, 2019 at the LHA Administrative Offices, 430 Hartsell Avenue, Lakeland.

**The Public Hearing is scheduled for July 3, 2019 at 9:00 a.m.**

LHA has developed its Agency Plan Substantial Deviation and Significant Amendment 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 Substantial Deviation and Significant Amendments and its attachments are available for review at the Lakeland Housing Authority between the hours of 8:00 a.m. and 5:00 p.m., Monday through Thursday, beginning on June 3, 2019 and ending on July 19, 2019. The plan will be posted for 45 days. Inquiries and comments may be directed to Carlos Pizarro, Vice-president of Housing, at [cpizarro@lakelandhousing.org](mailto:cpizarro@lakelandhousing.org) and/or Valerie Brown, Vice-president of Administration, at [vbrown@lakelandhousing.org](mailto:vbrown@lakelandhousing.org) and/or Florida Relay services at 711 and/or by visiting: [www.LakelandHousing.org](http://www.LakelandHousing.org).

The Housing Authority of the City of Lakeland dated June 3, 2019.

L2018 06/03; 2019-Public and Legal Notice



## Annual Plan Amendment No. 2-2019

### Criteria for Substantial Deviation and Significant Amendments

Section 22 of the United States Housing Act of 1937, (42 U.S.C. 1437t) (the 1937 Act)  
24 CFR Part 972 subpart B

#### **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:

- Streamlined Voluntary Conversion of the Public Housing Portfolio
- This amendment was posted for 45 days starting on June 3, 2019
- Public Meeting and Resident Advisory Board Meeting is scheduled on July 3, 2019 at 9:00 am

#### **Purpose:**

Voluntary conversion allows a Public Housing Authority (PHA) to convert a part or the entire public housing project or projects to Housing Choice Vouchers (HCVs). This allows small PHAs greater flexibility to respond to local needs, allows them to pursue private financing, and provides greater housing choice and mobility to assisted households.

HUD is authorized under Section 22(b)(3) of the "Housing Act" to waive the conversion assessment or require a streamlined conversion assessment for "any public housing project or class of public housing projects." HUD can authorize its authority under Section 22(b)(3) of the 1937 Act to waive the conversion assessment for small PHAs as described at Sections 22(b)(1)(A)-(E) and 24 CFR 972.218(a)-(e). This waiver does not affect other voluntary conversion requirements or procedures under the statute, regulations, directives, or guidance.

#### **Background:**

The Housing Authority of the City of Lakeland's (HACL) mission 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. To ensure the long-term stability of the agency, the Housing Authority must preserve the existing housing structures, rebuild when and where necessary, support the residents of the communities.

HUD and PHAs are committed to providing subsidized rental assistance to the nation's most vulnerable populations, including the elderly, disabled and formerly homeless

families. Meeting this commitment has been challenged due to significant capital backlog, combined with regulatory burdens and limited access to private capital. Voluntary conversion allows PHAs to voluntarily reposition public housing units to a more sustainable funding platforms in order to meet local objectives. HUD is committed to working with PHAs to achieve sustainability of assisted housing in its particular housing market and community, while balancing overall cost-effectiveness for the Federal government.

To achieve HACLs mission, Section 22(c) permits PHAs to convert a Section 9 public housing project (or portion thereof) (i.e., a public housing project or portion thereof receiving Section 9 assistance under the 1937 Act) to Housing Choice Voucher (HCV) assistance if the PHA demonstrates the conversion will:

- 1) is not more expensive than continuing to operate as public housing;
- 2) principally benefits residents, the PHA, and the community; and
- 3) has no adverse effect on the availability of affordable housing in the community.

In accordance with Section 22(b)(1)(A) of the 1937 Act, as amended by Section 553 of the Quality Housing and Work Responsibility Act of 1996 (P.L. 105-276), and HUD's implementing regulations at 24 CFR 972.212 and 972.218, PHAs shall conduct a conversion assessment and provide a timeline identifying PHA actions to convert to HCV assistance. The conversion assessment consists of a cost analysis, market value analysis, rental market analysis, and an impact analysis on the neighborhood.

**Development:**

Preserving and rebuilding the housing portfolio is vital to the HACL's sustainability. It is the intended of the HACL to convert the subsidy of the Public Housing portfolio to Housing Choice Voucher funding. This will ensure that HACLs physical structures are well maintained and safe. As part of the voluntary conversion the Housing Authority is planning redevelopment activities at the sites below.

- West Lake Redevelopment Project phases I-III
- Arbor Manor Redevelopment Project
- Micro-Cottages at Williamstown Redevelopment Project

The developments that will be impacted through the voluntary conversion are listed below.

- Westlake Apartments
- John Wright Homes
- Cecil Gober Villas
- Hampton Hills Homes
- Dakota Park
- Washington Renaissance I
- Washington Renaissance II

- Arbor Manor
- Williamstown

**Resident Involvement:**

The conversion plan will have input and participation from the residents as required by 24 CFR 972.227(c). The Housing Authority will summarize the resident comments from meetings and provide the agency's response to any significant issues raised by the commenters including a description of the action to be taken by the Housing Authority as a result of the comments.

\_\_\_\_\_  
Signature of the President & Chief Executive Officer

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Public Housing Director

\_\_\_\_\_  
Date

**DRAFT**

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

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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 recipients 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](http://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](http://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:

| <b>Provision of Written Language</b>  | <b>Language Groups</b> | <b>Determination</b>  |
|---|------------------------|---|
| 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.

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

**FAMILY SELF SUFFICIENCY**

**ACTION PLAN**

**2019**

**HOUSING AUTHORITY OF THE CITY OF LAKELAND, FLORIDA  
FAMILY SELF SUFFICIENCY  
ACTION PLAN**

**INTRODUCTION**

The Lakeland Housing Authority (LHA) is the quasi-government agency created for the oversight of HUD funding included, but not limited to PH/HCV programs. LHA has approximately 453 public housing units located on eight (7) housing complexes.

LHA's Section 8 is responsible for (1,218 HCV & 25 Mainstream Disable Vouchers). Individuals being assisted through both the Public Housing and Section 8 HCV program 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 & Administrative Plan.

Family Self Sufficiency (FSS) Availability

At the present time the number of mandatory Section 8 slots has been reduced from Eighty-eight (88) 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 (88). The LHA Board of Commissioners has authorized One Hundred (100) Public Housing FSS slots (not HUD mandated). The Public Housing slots can be increased based on available funding and an exhibited need. The criteria established for participation in the FSS program will be the same for all participants. Anyone interested in participating in the FSS program may volunteer to do so.

Goals

The primary goal of the FSS Program is that participating families achieve social and economic independence by receiving necessary training and that all individuals in the household who are able become gainfully employed. Each family should be free from any dependence on public assistance programs. A secondary goal to be discussed with each family is home ownership.

Documents

Several documents, which are required by HUD to be kept 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.

- The **Instructions for Executing the Contract of Participation** will set forth the instructions established by HUD and identifies the responsibilities and obligations on the part of the resident and the LHA. (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. (Exhibit B-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. (Exhibit C)
- 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 (Exhibit D2-form HUD-52652)

#### Family Self-Sufficiency Program Coordinating Committee

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, child care 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.

#### Staffing

The Family Self-Sufficiency Coordinators will oversee the activities of the FSS programs for both PH & HCV. The individuals conducting orientation and re-certification workshops for both Public Housing and Section 8 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.

### **PARTICIPANT RECRUITMENT**

#### Printed Materials

The FSS program is desirable to a variety of individuals receiving housing assistance from the LHA. Residents at various stages of training and/or an employment status have extremely diverse reasons for wanting to participate in the FSS program. All possible sources for public notification and on-going recruitment will be used. These will include (but not be limited to) flyers distributed to residents during orientation, door to door delivery, newsletters, posting at manager's offices and reception areas, utility payments made to residents and resident meetings. In addition, an annual mailing to all housing assistance recipients will be made to reinforce the availability of this program. All public recruitment notices for new residents will also include mention of the FSS Program. Whenever it is possible the local media will be used to recognize successful participants.

### Staff Outreach

Public Housing Managers approach each resident about the FSS program at the time notice is given of any change in status (i.e., return to school, employment opportunities, changes in family composition).

### Other 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 on going. Opportunities to alert caseworkers from the Department of Children and Families, United Way, Jobs and Benefits, Polk Work One Stop Center, Vocational Training, Vocational Rehabilitation, WAGES, Head Start and other programs about the FSS opportunities 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.

## **SCREENING AND SELECTION PROCEDURES**

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 Resident Services Associates 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. Individuals who are college graduates with a marketable skill and who are gainfully employed will not be considered in need of the FSS program.

In the event that there are no vacant slots for Section 8 residents, a waiting list will be established. By quarterly review, inactive participants will be removed from the roster and those residents on the waiting list will be approached about participating in the program at the new date. In the event that 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.

To be determined active, each participant will be expected to attend resident and FSS meetings, mail monthly reports identifying education progress or employment training outcomes and 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 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.

Instruction for Executing the Contract of Participation

See the attached Instruction for Executing the Contract of Participation and the Contract of Participation presently being used for FSS participants. (Exhibit A)

The Contract of Participation

See the attached Instruction for Executing the Contract of Participation and the Contract of Participation presently being used for FSS participants. (Exhibit B)

Individual Training and Services Plan

An ISTP has been designed for each client and will be reviewed with the FSS Coordinator on an annual basis or if the participant makes a request, more frequently. (Exhibit C)

**INTEGRATION OF SERVICES**

The collaborative programs run by the Lakeland Housing Authority including an Office Skills Trainee Program, Traviss Technical Center, Healthy Families, Kid House, Computer Job Search Center are on-site activities that are currently in place. In addition, non financial agreements are in place with the Polk Workforce Development Board, Polk Work One Stop Center, United Way, Florida Department of Labor Jobs and Benefits to provide employment and training services to LHA residents.

**SUPPORTIVE SERVICES**

All FSS participants when enrolled in employment and training activities will be assisted in utilizing local resources for child care, transportation, medical and dental services, clothing and other supportive services. Public Housing residents may be eligible for benefits available through available grants and all LHA residents will be assisted through all potential sources identified by the Resident Services Associates. Welfare reform identifies several transitional services as residents enter the workplace. On site training courses are Computer training, GED, FCAT, Job Search Center, and TABE testing.

## **SPECIAL PROGRAMS**

In addition to employment and training programs, FSS participants will be expected to participate in growth and development training opportunities to include but not be limited to:

- Budget Counseling and Credit
- Parenting and Family Planning
- Health Issues including substance abuse and sexually transmitted disease awareness
- Home Ownership Opportunities
- Decision Making and Conflict Resolution programs
- Citizenship and Volunteer Opportunities
- SHARE Food Program
- Home Maintenance and Repair

### On-Going Programs

Several agencies receive funding from a variety of sources 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 literacy, recreation, health and social issues.

## **CAREER 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 EDSS and HOPE VI 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 8<sup>th</sup> 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 Barrier:  
Receiving disability benefits or in the process of being determined eligible for benefits  
Need for supportive services such as transportation, childcare, clothing, etc.

## **WORK PLACEMENT**

Resident Services Associates are working by non-financial agreement with the Florida Department of Labor to assist all residents in subsidized housing through the Lakeland Housing Authority in finding meaningful employment. Access to the job bank information available at the Jobs and Benefits office has been arranged at the Washington Park Housing Complex in the Emma Mae Smith Turner Community Center. A Job Club is being conducted there on occasion. In addition, the WAGES and JTPA staffs are working with the residents eligible for those activities.

## **SUPPLEMENTARY EDUCATION**

As a result of WAGES, clients who may have once been eligible for JTPA are in some instances being sent into the workplace with very minimal job skills. The Resident Services Associates have been reviewing families enlisting in the FSS, and other grant funded programs to assist in decision making about the appropriate use of available childcare funding and other supportive services which may assist eligible residents in returning to school to upgrade or gain much needed job skills training.

The Lakeland Housing Authority operates an office skills trainee program in conjunction with the WAGES program. Also, an adult education program offering GED preparation is conducted at the Westlake Community Center and Computer Courses.

Courses are available for tuition skills upgrade or academic remediation course that will make a difference in job placement.

## **TRANSPORTATION**

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

## **UNAVAILABILITY OF SUPPORTIVE SERVICES**

In some instances a resident may not be able to meet work related goals as a result of the unavailability of supportive services. If the FSS Coordinator determines with the resident that the need for supportive services is temporary, an extension to the time period 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, the client may be released from the Contract.

## **SHORT AND LONG TERM GOALS**

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. (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 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. 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.

### **General Short and Long Term FSS Family Goals Recommendation**

#### Monthly Reports

The family must submit a monthly report identifying the completion of goals and the employment status. (Exhibit E)

## ESCROW FUNDS ACCOUNT

The Lakeland Housing Authority 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 and are in compliance with all HUD rules 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 periodically, or annually to each participating family's FSS account with annual reports provided to FSS families.

The escrow credit for low-income families, whose incomes are between fifty and eighty percent of the area median income will be based on fifty percent of the median income limit. Escrow credit worksheets will be calculated at each interim or annual re-certification 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 for twelve consecutive months prior to the successful completion of the contract. In addition, the family must sign a statement attesting to this. The FSS Coordinator will verify information by telephone verification 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.

"Welfare assistance" means income assistance from Federal or State welfare programs, and includes only cash maintenance payments designed to meet a family's ongoing basic needs. The definition borrows from the Department of Health and Human Services' TANF definition of "assistance" and excludes nonrecurring short-term benefits designed to address individual crisis situations. For FSS purposes, the following do not constitute welfare assistance: food stamps; emergency rental and utilities assistance; and SSI, SSDI, and Social Security.

As a general rule LHA, at its sole option, can authorize a one time 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 interim Contract goals, 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 homeownership, tuition or related training expenses, small business start up expenses, automobile purchase for work related activities, job training and/or

equipment and supplies. The amount of the request is limited to twenty percent (20%) per year of successful contract completion.

### **FSS PORTABILITY**

An FSS family must make a commitment to remain in a residence in the jurisdiction of the 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.

### **REJECTION OF AN APPLICANT**

An applicant will not be accepted into the FSS program if one or more of the following conditions exist:

1. The applicant's income does not fall under Section 8 or Public Housing guidelines.
2. The applicant refuses to pay money owed to the Housing Agency.
3. The applicant is uncooperative during the interview process and/or behaves in a belligerent, abusive or irresponsible manner. This could include being chronically late for appointments and/or failing to participate in meetings.
4. The applicant appears to or is involved in criminal behavior and shows no indication towards rehabilitation.
5. The supportive services, which may be needed for the successful completion of interim and long-term goals, are not available.
6. The family was previously enrolled in FSS and successfully completed and received their final escrow disbursement or did not complete the contract and failed to be removed from the FSS program with the permission of the appropriate parties.

### **TERMINATIONS**

An FSS participating family may be terminated from the program for any of the following reasons:

1. The participating family fails to comply with the Contract of Participation and/or the Individual Training and Services Plan.
2. The participant voluntarily withdraws from the FSS program for personal reasons.
3. The participant withdraws or is asked to leave by mutual consent of all parties.
4. The Contract of Participation and/or any extensions expire.
5. The participant or family member commits fraud, any criminal activity or a violation of the LHA lease that cannot be corrected.
6. The participating family is deemed to be acting in a manner that is inconsistent with any aspect of the FSS program and the purpose of the program.

### **APPEALS**

The family who is either rejected from participating or terminated from the program has the right to request an appeal through the following process within ten (10) working days of the rejection

or termination. Send a letter to the FSS Coordinator or the Executive Director it will be reviewed by the Program Coordinating Committee. The Program Coordinating Committee will make a final determination. If at any time, the family status changes that the family believes it may be eligible for participation in the FSS program, the family may reapply.

## **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 residents.

## **EXHIBIT A**

### **Instruction for Executing the Contract of Participation**



U.S. Department of Housing and Urban Development  
Section 8, Public Housing and Indian Housing Programs  
**FAMILY SELF-SUFFICIENCY PROGRAM**

Page \_\_\_ of \_\_\_

**Instructions for Executing the 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 LHA Representative
- The expiration day is five years from the effective date of the contract.
- If the LHA 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. Initial all changes.
- 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.

**FSS Escrow Account**

- The income and rent numbers to be inserted in Section V of the Contract 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 LHA must conduct a new reexamination or interim redetermination.
- If a Family moves under Section 8 portability procedures and is going to participate in the receiving Housing Authority's FSS program, the receiving Housing Authority must use the amounts listed for annual income, earned income, and Family rent shown in Section V of the contract between LHA 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, 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.
  1. 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.
  2. 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.
  3. 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.

## **Incentives**

- If a Housing Authority has chosen to offer incentives in connection with the FSS program, these incentives may be included in the Individual Training and Services Plan or as an attachment to the contract.

## **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 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.

## **Short and Long Term FSS Family Goals**

### Years 1-2

- Vocational or education training
- Job training or employment for advancement
- Must be employed in a realistic field to progress or advance
- Must have actively sought employment and be able to verify that sincere efforts have been made to gain employment
- Must follow through with all referrals for employment

### Years 2-3

- Employment with potential for advancement
- Involvement in vocational or educational training for degree
- Must be near completion in education or vocational training
- Must have been employed during some part of this period or actively seeking employment
- Must have completed interim goals in the Individual Training and Services Plan

### Years 4-5

- Employed and working towards self-sufficiency
- Involved and near completing training
- Must actively seek employment and obtain employment upon completion of training
- Must be independent of Federal or State welfare assistance at least twelve (12) consecutive months prior to the contract expiring.
- Must have completed an Individual Training and Services Plan

**EXHIBIT B**  
**The Contract of Participation**

## **EXHIBIT C**

### **Individual Training and Services Plan (ITSP)**

## **EXHIBIT D**

**HUD Family Self-Sufficiency Program  
FSS Escrow Account Credit Worksheet**  
(An illustration of the process. PHA may develop own)

**LHA Family Self-Sufficiency Program  
FSS Escrow Account Credit Worksheet**

# **EXHIBIT E**

## **Monthly Reporting Forms**



## **EXHIBIT F**

### **Miscellaneous Recruitment Information**



# **Analysis of Impediments to Fair Housing Choice**

Housing Authority of the City of Lakeland

## Table of Contents

|  |    |
|--|----|
| 1. Introduction/Executive Summary .....  | 4  |
| 2. Jurisdictional Background Data .....  | 5  |
| 3. Evaluation of Jurisdiction’s Current Fair Housing Legal Status .....                | 8  |
| 4. Considerations for Analysis of Impediments to Fair Housing Choice .....             | 8  |
| Identified and Potential Impediments .....   | 8  |
| Impediment #1: Isolation due to affordability issues .....                             | 8  |
| Impediment #2: Ability of low-income households interested in becoming homeowners..... | 8  |
| Impediment #3: Public awareness .....  | 8  |
| Impediment #4: Physical accessibility .....  | 8  |
| Impediment #5: Discrimination due to race, ethnicity, gender, disability.....          | 9  |
| 5. Conclusions and Recommended Actions .....   | 10 |
| 7. Signature .....   | 10 |

### Appendices

Appendix 1: Section 8 Questionnaire

Appendix 2: Public Housing Questionnaire

## **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, 2018 through December 31, 2018. As part of the PHA Plan, the HACL consults with the City of Lakeland, NAACP-Lakeland Chapter, 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

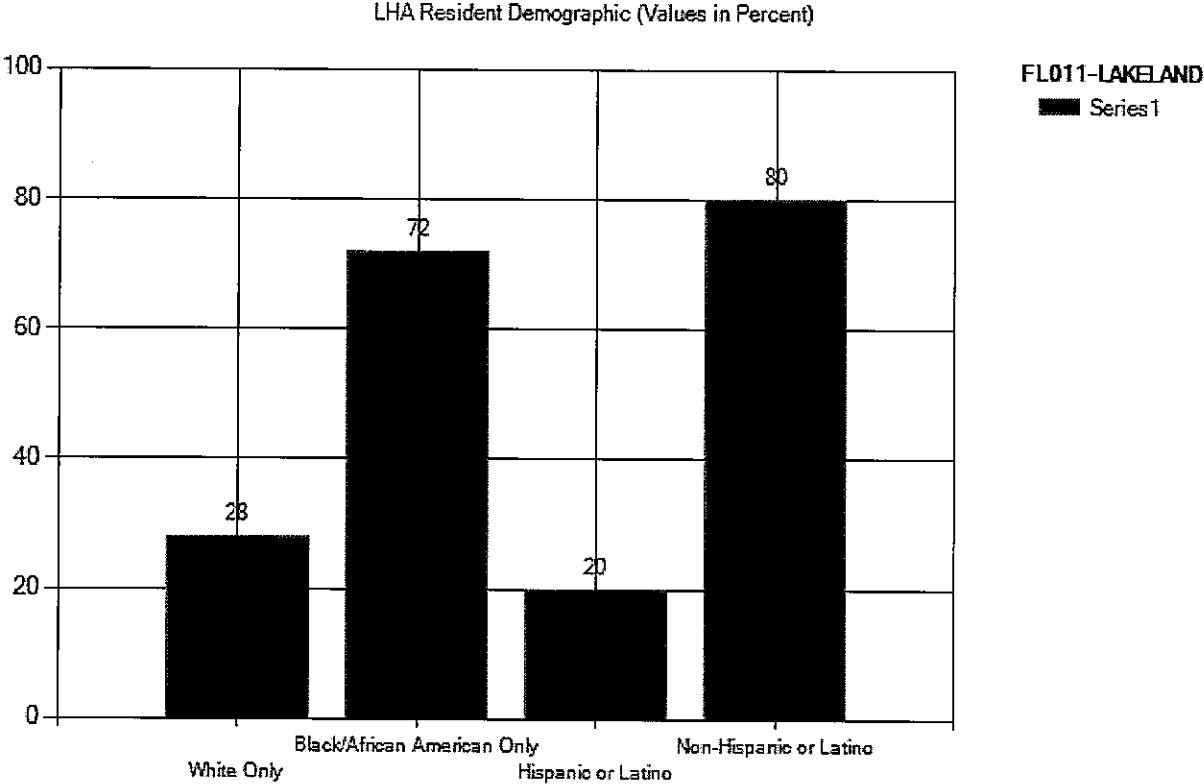
The HACL affordable housing programs include conventional public housing, Section 8 and the mixed income affordable housing opportunities. The HACL Section 8 Program includes 1,540 Housing Choice Vouchers (HCVs) and the agency self-manages all of its communities including the following public housing and mixed income developments:

| Public Housing Program |            |               |
|------------------------|------------|---------------|
| Community              | # Units    | Type          |
| Westlake Apartments    | 120        | Multi-Family  |
| John Wright Homes      | 20         | Multi-Family  |
| Cecil Gober Villas     | 37         | Elderly       |
| Hampton Hills Homes    | 8          | Homeownership |
| <b>Total</b>           | <b>185</b> |               |

| 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     |
| <b>Total</b>                | <b>483</b> |              |                                       |

# 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                |          |

## **Income Data**

The HACL's average household income ranges from a low of \$0.00 to a high of \$49,443.00 with an overall average of \$13,642.00.

### **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 assistance Section 8 Voucher Program recipients in efforts to locate higher quality housing.
  - List available rental units is available in the lobby of the HACL office
- Action 2 – Educate and work with landlords to increase the availability of Section 8 properties throughout the city of Lakeland
  - Host an Information Workshop on the Section 8 Program for new landlords
  - Post a copy of the Section 8 Landlord Packet on the HACL Website for new landlords to download
  - Mail information flyers with updates on the Section 8 program to existing and potential landlords
- Action 3 – When working with developers, encourage mixed income, universal design developments and utilizing the Uniform Federal Accessibility Standards(UFAS).
  - Contracts with developers require designs for new housing units to comply with UFAS and other related HUD requirements

### **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.
  - Contract with a HUD approved and certified homeownership counseling agency to assist potential homebuyers with credit repair and budgeting
- Action 2 – Continue work with families who have expressed an interest in homeownership.
  - Contract with a HUD approved and certified homeownership counseling agency to provide pre- and post-homeownership counseling
  - Develop Homeownership Program that provides homeownership

opportunities for residents of public housing

- Action 3 – 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 Fair Housing information on the HACL’s website and facilitate fair housing education.
- Action 2 – Inform/educate landlords through outreach efforts including trainings, meetings, literature and other methods.
  - Host an Information Workshop on the Section 8 Program for new landlords
  - Mail information flyers with updates on the Section 8 program to existing and potential landlords
- Action 3 – Support consumer education programs, such as homebuyer counseling and education.
  - Contract with a HUD approved and certified homeownership counseling agency to provide pre- and post-homeownership counseling
  - Work with local agency to provide a consumer education and financial counseling workshop on-site
- Action 4 – Participate in Fair Housing education efforts.
  - Work with the City of Lakeland and local partners
- Action 5 – Promote Fair Housing month.
  - Work with the City of Lakeland and local partners
- Action 6 –Review and update Affirmatively Furthering Fair Housing Policy and Analysis to Impediments to Fair Housing Choice documents.
  - Present any updates to the HACL Board of Commissioners
  - Post updated Fair Housing Choice documents on HACL website

### **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 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).
  - HACL will develop a new senior community, Micro-Cottages at Williamstown, that complies with UFAS
  - Contracts with developers require designs for new housing units to comply with UFAS and other related HUD requirements
  - Contracts with developers require mixed income rental housing units that comply with the requirements of Low Income Housing Tax Credit program
- Action 5 – A physically disabled person is a member of the HACL Board of Commissioners
  - Physically disabled HACL commissioner is a member of a State-wide Board that reviews accessibility accommodations and related items
  - Physically disabled HACL commissioner is a member of a NAHRO Diversity Task Force

**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.
  - HACL hosted an agency-wide training for staff conducted by a Fair Housing consultant
- Action 3 – Educate Staff by attendance in fair housing training.
  - HACL hosted an agency-wide training for staff conducted by a Fair Housing consultant

## 7. Signature

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.

\_\_\_\_\_  
Benjamin Stevenson, President/CEO  
Housing Authority City of Lakeland

\_\_\_\_\_  
Date

**APPENDICES**

**Appendix 1**

| <b>Section 8 Program</b>  |  |                 |
|---|--|-----------------|
| <b>Question</b>   | <b>Response</b>  | <b>Comments</b> |
| 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?                                     | Regular outreach to promote the program to landlords in all areas of jurisdiction.<br><br>New applicants attend a briefing session prior to Voucher issuance which includes information on choosing a unit |                 |
| Assist voucher holders who received their vouchers from Agencies in other jurisdictions?                            | Yes – if they choose their portability option<br><br>In instances of portability   |                 |
| Assist voucher holders with disabilities by providing assistance in locating available accessible housing?          | Yes. All families receive the same information.<br><br>Offer a list at orientation of all known rental complexes in the City of Lakeland.  |                 |

**Section 8 Program**

| <b>Question</b>  | <b>Response</b>   | <b>Comments</b> |
|--|---|-----------------|
| <p><b>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)?</b></p> | <p>Yes. This list is located in the orientation packet that is provided upon request.</p>   |                 |
| <p><b>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?</b></p>  | <p>All families receive the same information.</p> <p>All participants are given briefed 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><b>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?</b></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><b>Has Agency conducted a needs assessment to identify need for accessible units and does it have a transition plan to assure access?</b></p>   | <p>To best serve applicants and tenants we constantly review our policies and procedures. Inspections are also conducted.</p>   |                 |
| <p><b>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?</b></p>  | <p>All applicants and tenants are treated in a fair and consistent manner. Information is available to tenants who require special accommodations, and we do our best to ensure their needs are met.</p>  |                 |

| <b>Public Housing Questionnaire</b>  |   |                 |
|--|---|-----------------|
| <b>Questions</b>   | <b>Response</b>   | <b>Comments</b> |
| 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?                      | Applications accepted from all persons.<br><br>The PHA is undertaking a 5-year plan to address redevelopment, modernization and sustainability of all sites.<br><br>The plan also addresses educational opportunities designed to improve the quality of life and economic position of residents. |                 |
| Does the PHA policy permit applicants to state a preference for one or more projects?                        | Yes<br><br>All applicants may apply to multiple developments  |                 |
| Are transfers permitted by current tenants?  | Yes<br><br>Current policy allows for transfers for special accommodations   |                 |
| Does the PHA permit applicants to reject several unit offers without losing their place on the waiting list? | Yes<br><br>There is one rejection for good cause. Applicants may remain on list, but their application is refiled as of the date of the rejection   |                 |
| What are the PHA's policies for admitting persons with mental or nonphysical disabilities?                   | Persons are accepted with any disability  |                 |



**Public Housing Questionnaire**

| <b>Questions</b>   | <b>Response</b>  | <b>Comments</b> |
|--|--|-----------------|
| <b>Has the PHA completed is Section 504 (of the Rehabilitation Act of 1973) assessments of need?</b>   | Yes  |                 |
| <b>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?</b> | Yes<br><br>Not all deficiencies are corrected due to age of properties and loss of Capital Funds |                 |
| <b>Has the PHA completed a needs assessment to identify need for accessible units?</b>   | Yes  |                 |