

# PHA Name : Housing Authority Of The City Of Lakeland

**PHA Code :** FL011

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 1/1/2024

**PHA Program Type:** Combined

**MTW Cohort Number:** Asset Building

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

LHA plans to help participants build and leverage their positive financial capacity and increase the impact of financial decisions for their futures. As described below, the Lakeland Housing Authority's overall vision for its Moving to Work (MTW) program focuses on the three statutory objectives of the MTW Demonstration Program – cost effectiveness, self-sufficiency and housing choice.

1. Cost Effectiveness: In our first year as an MTW Agency, the Lakeland Housing Authority's (LHA) vision is to build successful collaborations with community partners that will assist our program participants in moving towards economic self-sufficiency; building and strengthening their household assets, providing greater financial security, having better housing options, or achieving home ownership. This is at the core of activities we will undertake as part of the Asset Building cohort including but not limited to helping families with increasing their credit scores by reporting their rent payment to the credit bureau! The LHA will also focus efforts on the many benefits of the MTW Program which will deliver a reduction in the administrative burden experienced by our customers and our staff. This includes alternative every three years recertification schedules and rent simplification initiatives for our households, such as raising the minimum rent from \$50 to \$130, allowing self-certification up to \$50,000 and capturing new income types.

With high demand for affordable housing in Polk and Highland County and long waiting lists for HUD programs, it is important to LHA to serve as many unassisted households as possible. MTW funding flexibility will serve to enhance our existing practices. MHA will explore flexibility in the implementation of its FSS program with activities tied to the asset building focus of our MTW plan, credit reporting, three-year alternative reexamination schedule for households, and MTW funding flexibility. These flexibilities will allow LHA to assist more households to become self-sufficient and, in so doing, we will be able to serve more unassisted households each year. LHA will seek to increase assisted households' access to banking resources.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Plan to Implement in the Submission Year
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Plan to Implement in the Submission Year
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Plan to Implement in the Submission Year
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
p. Imputed Income (PH)	Plan to Implement in the Submission Year
q. Imputed Income (HCV)	Plan to Implement in the Submission Year
r. Elimination of Deduction(s) (PH)	Plan to Implement in the Submission Year
s. Elimination of Deduction(s) (HCV)	Plan to Implement in the Submission Year
t. Standard Deductions (PH)	Plan to Implement in the Submission Year
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Plan to Implement in the Submission Year
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Plan to Implement in the Submission Year
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Plan to Implement in the Submission Year
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
d. Alternative PBV Selection Process (HCV)	Plan to Implement in the Submission Year
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Plan to Implement in the Submission Year
f. Increase PBV HAP Contract Length (HCV)	Plan to Implement in the Submission Year
g. Increase PBV Rent to Owner (HCV)	Plan to Implement in the Submission Year
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Plan to Implement in the Submission Year
a.HCV Alternative Family Selection Procedures (HCV)	Plan to Implement in the Submission Year
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Plan to Implement in the Submission Year
b. Work Requirement (HCV)	Plan to Implement in the Submission Year
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Plan to Implement in the Submission Year
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Plan to Implement in the Submission Year
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Plan to Implement in the Submission Year
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Plan to Implement in the Submission Year
b. Service Provision	Plan to Implement in the Submission Year

**C. MTW Activities Plan that Housing Authority Of The City Of Lakeland Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.e. - Minimum Rent (PH)</b>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>Establishing a minimum rent should encourage families to seek training and employment helping them on becoming self-sufficient. To be implemented in the MTW Supplement submission year, LHA plans to increase its minimum rent from \$50 to \$130 across both the LHA's Housing Choice Voucher and Low-Income Public Housing programs. Raising the minimum rent to \$130 is more in line with current market conditions and expectations. The raise in minimum rent for non-disabled, non-elderly, typically working households is expected to be offset by working households not needing to declare any income increases between reexaminations. Families with an elderly or disabled head-of-household will be excluded from the minimum rent policy. All other households will be required to pay the minimum rent unless they request consideration under the hardship policy.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Self-sufficiency</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased revenue</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>Implementation is scheduled for 2024 starting in January 1.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b></p> <p>1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 1.e. - Minimum Rent (PH); 1.f. - Minimum Rent (HCV); 1.g. - Total Tenant Payment as a Percentage of Gross Income (PH); 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV); 1.p. - Imputed Income (PH); 1.q. - Imputed Income (HCV); 1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 2.b. - Payment Standards- Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV); 7.a. - Term-Limited Assistance (PH); 7.b. - Term-Limited Assistance (HCV); 12.a. - Work Requirement (PH); 12.b. - Work Requirement (HCV)</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p>

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**How much is the minimum rent or minimum Total Tenant Payment (TTP)?**

\$130.00

**1.f. - Minimum Rent (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Establishing a minimum rent should help our residents and participants on becoming self-sufficient. LHA plans to increase its minimum rent from \$50 to \$130 across both the LHA's Housing Choice Voucher and Low-Income Public Housing programs. Raising the minimum rent to \$130 is more in line with current market conditions and expectations. The raise in minimum rent for non-disabled, non-elderly, typically working households is expected to be offset by working households not needing to declare any income increases between reexaminations. Families with an elderly or disabled head-of-household will be excluded from the minimum rent policy. All other households will be required to pay the minimum rent unless they request consideration under the hardship policy.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

1.c. - Stepped Rent (PH); 1.d. - Stepped Rent (HCV); 1.e. - Minimum Rent (PH); 1.f. - Minimum Rent (HCV); 1.g. - Total Tenant Payment as a Percentage of Gross Income (PH); 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV); 1.p. - Imputed Income (PH); 1.q. - Imputed Income (HCV); 1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 2.b. - Payment Standards- Fair Market Rents (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV); 7.a. - Term-Limited Assistance (PH); 7.b. - Term-Limited Assistance (HCV); 12.a. - Work Requirement (PH); 12.b. - Work Requirement (HCV)

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**How much is the minimum rent or minimum Total Tenant Payment (TTP)?**

\$130.00

**1.g. - Total Tenant Payment as a Percentage of Gross Income (PH)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

This activity should streamline the recertification process.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>No</p> <p>No document is attached.</p>
<p><b>What percentage of income will equal the Total Tenant Payment (TTP)?</b></p> <p>30.00%</p>
<p><b>What is the income basis for calculating Total Tenant Payment?</b></p> <p>This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs)</p>

<p><b>1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>This initiative should improve the recertification progress.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>2024</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>No</p> <p>No document is attached.</p>
<p><b>What percentage of income will equal the Total Tenant Payment (TTP)?</b></p> <p>30.00%</p>

**What is the income basis for calculating Total Tenant Payment?**

This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs)

**1.o. - Initial Rent Burden (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Rent burden is set at 50% and should help participant find better housing opportunities in this hard rental market.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?**

50.00%

**1.p. - Imputed Income (PH)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Imputed income will only be used on those families refusing to work or to seek employment.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies to all assisted households
<b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b> 2024
<b>Does this MTW activity require a hardship policy?</b> Provided Already
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Does the MTW activity require an impact analysis?</b> No  No document is attached.
<b>Does the imputed income policy assume a set number of hours worked per individual or per household?</b> Per individual
<b>How many hours per week are assumed?</b> 30
<b>What is the assumed wage rate?</b> \$12
<b>How many households are currently subject to this policy?</b> 0

<b>1.q. - Imputed Income (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> None for HCV
<b>Does the imputed income policy assume a set number of hours worked per individual or per household?</b> Per individual
<b>How many hours per week are assumed?</b> 30
<b>What is the assumed wage rate?</b> \$12

**How many households are currently subject to this policy?**

1,000

**1.r. - Elimination of Deduction(s) (PH)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The following deductions will be added to help families on becoming self sufficient: Dependent Care and Unreimbursed child care cost.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**Which deduction(s) will be eliminated, modified, or added?**

Dependent allowance; Unreimbursed childcare costs

**1.s. - Elimination of Deduction(s) (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The HCV Program will be allowing families to deduct childcare cost, this will allow families to pay their rent on time and move toward a better future.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**Which deduction(s) will be eliminated, modified, or added?**

Unreimbursed childcare costs

**1.t. - Standard Deductions (PH)**

**How much will the single standard deduction be in the Fiscal Year?**

\$0

**1.u. - Standard Deductions (HCV)**

**How much will the single standard deduction be in the Fiscal Year?**

\$0

**2.b. - Payment Standards- Fair Market Rents (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The Payment Standard will be set at 120% of the FMR's, this new Payment Standard limit should help families find suitable housing.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**Please explain the payment standards by FMR:**

the PMR will be set at 120%, increasing the PMR will allow families to improve their chances of finding a suitable home.

## **2.c. - Rent Reasonableness – Process (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The LHA Rent Reasonable process will continue to use Affordable Housing Company which provides with the best results.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

We have been using the same system for the past 10 years.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.**

We are using the standard method.

**2.d. - Rent Reasonableness – Third-Party Requirement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The Housing Authority uses a software in order to get accurate Rent Reasonable reports on rents and units.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please explain or upload a description of the quality assurance method.**

In 2024 VHA will add Quality Control Inspections to this activity. 5% of all completed inspections completed each year will be re-inspected by an independent third party as a Quality Control measure.

This MTW activity allows the LHA to have Section 8 HCV department staff perform HQS inspections and determine rent reasonableness for units owned by the LHA or owned by an entity substantially controlled by the LHA such as a tax credit property. This authority creates substantial savings compared to what the LHA was being charged by contracted inspectors. Addition of Quality Control Inspections.

There are no planned changes or modifications to the metrics for this activity during the Plan year.

LHA does not plan to pursue any significant changes to this activity in the Plan year.

This document is attached.

**Please explain or upload a description of the rent reasonableness determination method.**

No document is attached.

**3.a. - Alternative Reexamination Schedule for Households (PH)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The alternative reexamination schedule will be every three years, this initiative will allow the participants to earned and safe money helping them on becoming self sufficient.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

1

**Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**

Any family changes will be addressed with one interim recertification per year.

### **3.b. - Alternative Reexamination Schedule for Households (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The alternative reexamination will allow participants earned and safe their income in order to become more self sufficient.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does this MTW activity require a hardship policy?**

Provided Already

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

No

No document is attached.

**What is the recertification schedule?**

Once every three years

**How many interim recertifications per year may a household request?**

1

**Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.**

Family changes will be processed once a year.

### **3.c. - Self-Certification of Assets (PH)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The HA is allowing families to self certify up to \$50,000.00 in assets in order to streamline the recertification process so families can spend more time seeking employment or working.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

**3.d. - Self-Certification of Assets (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The HA is allowing families to self certify up to \$50,000.00 in assets in order to streamline the recertification process so families can spend more time seeking employment or working.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please state the dollar threshold for the self-certification of assets.**

\$50,000.

**4.a. - Vacancy Loss (HCV-Tenant-based Assistance)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The vacancy loss initiative will allow the housing authority to recruit more landlords.

<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>2024</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)</b></p> <p>To all units</p>
<p><b>What is the maximum payment that can be made to a landlord under this policy?</b></p> <p>2500.00</p>
<p><b>How many payments were issued under this policy in the most recently completed PHA fiscal year?</b></p> <p>0</p>
<p><b>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</b></p> <p>\$0</p>

<p><b>5.a. - Pre-Qualifying Unit Inspections (HCV)</b></p>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>The pre-qualifying unit inspections initiative will allow the housing authority to recruit more landlords, this initiative will allow the landlords to know before hand if their unit will pass inspection and if not they will have plenty of time to bring the property up to quality standards.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p>

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

**5.b. - Reasonable Penalty Payments for Landlords (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

To be determined

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**What is the maximum penalty payment that can be made to a landlord under this policy?**

The maximum penalty payment that can be made to a landlord under this policy is: One month rent

**How many penalty payments were charged under this policy in the most recently completed PHA recent year?**

0 penalty payments were charged under this policy in the most recently completed PHA fiscal year.

**5.c. - Third-Party Requirement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The third party requirements will be met by the in-house inspector, case workers or Property Managers.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Please explain or upload the description of the quality assurance method:**

Following will explain the quality assurance method

HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.

The unit sample must include only units that have been inspected within the preceding 3 months. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.

This document is attached.

### **8 - Increase Elderly Age (PH & HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

N/A

**What is the new definition of elderly?**

62

### **9.a. - Increase PBV Program Cap (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Increasing the PBV cap from 20% to 50% will allow the housing authority to find better housing choices for our families and participant.

<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency; Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Increased revenue</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>2024</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>What percentage of total authorized HCV units will be authorized for project-basing?</b></p> <p>50.00%</p>

**9.b. - Increase PBV Project Cap (HCV)**

<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>Increasing the cap from 20% to 50% will allow the housing authority to secure and find better housing alternative for the families looking for a home.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness; Self-sufficiency; Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>2024</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>

**9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Eliminating the PBV process will allow the Housing Authority to assign more projects to the PBV program, this initiative will increase the number of units available for rent in this hard rental market.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**9.d. - Alternative PBV Selection Process (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

PBVs will only be assigned to LHA's communities and it's Developer Partners.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

PBVs can be issued to Share Housing and Manufactured housing if needed.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?**

25

**How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?**

0

**How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?**

50

**How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?**

0

**9.f. - Increase PBV HAP Contract Length (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

20 years

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of**

**assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**9.g. - Increase PBV Rent to Owner (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

To be determined

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Self-sufficiency; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

2024

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

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

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

**Re: Resolution # (23-1536)**

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

**2. Who is making request:**

A. Entity: LHA

B. Project: Approval of the LHA 2024 Moving to Work Amendment to the Agency Plan and the 2024 Annual Plan including but not limited to the Capital Funds Plans and Budgets, Administrative Plan for the Housing Choice Voucher, the ACOP for the Public Housing Program, Limited English Proficiency Plan (LEP/LAP), Analysis of Impediments, Family Self Sufficiency Plan, Flat Rents Schedule, ADA 504 policy, Mold Policy, Maintenance Policy, Preventative Maintenance policy, Procurement policy, Organizational Chart, Housing Choice Voucher (Section 8) Homeownership Plan and signing the *PHA Certification of Compliance with the PHA Plans and Related Regulations*, forms 50075-ST and 50075-MTW (MTW Agency) and 50077's.

C. Originator: Carlos Pizarro

**3. Cost Estimate:**

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

**Narrative:**

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

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

This resolution seeks permission to authorize the Chair of the Board of Commissioners of the Housing Authority of the City of Lakeland to sign forms 50075-ST, 50075-MTW and 50077's and to direct the Executive Director of the Housing Authority of the City of Lakeland to submit the signed forms to the U.S. Department of Housing and Urban Development.

**Attachment:**

- *2024 Agency Plan, PHA Certification of Compliance with the PHA Plans (Agency Annual Plan, Capital Fund Plans and Budgets, Administrative Plan for the HCV Program, the ACOP for the Public Housing Program, Limited English Proficiency (LEP/LAP Plan), Analysis of Impediments, Family Self Sufficiency Plan, Flat Rents Schedule, ADA 504 policy, Mold Policy, Maintenance Policy, Preventative Maintenance policy, Voluntary Conversion, demolition and development activities, Procurement policy, Organizational Chart, Housing Choice Voucher (Section 8) Homeownership Plan and Related Regulations, forms 50075-ST, 50075-MTW and 50077, etc.*

## ***2024 Agency Plan and MTW Amendment***

A PHA Plan and MTW Amendment are 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 U.S. Department of Housing and Urban Development (HUD) once a year based on the PHA fiscal year, which is submitted to the HUD every year. It is through the Annual Plan that a PHA receives capital funding.

The Moving to Work (MTW) Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, about the MTW Waivers and associated activities that the MTW agency seeks to implement in the coming Fiscal Year and updates the status of MTW activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, compliance with MTW statutory requirements, and evaluations. The MTW Supplement does not replace the PHA Plan. MTW agencies must continue to submit the applicable PHA Plan. MTW agencies that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA) must submit the MTW Supplement annually.

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

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

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

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

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

The process to develop LHA's 2024 PHA plan spanned nearly three months and involved the collaboration of LHA staff, Public Housing residents, participants in the Housing Choice Voucher Program, stakeholders in the community, the City of Lakeland and, of course, LHA Board of Commissioners.

**RESOLUTION NO. 23-1536**

**APPROVING AND AUTHORIZING THE EXECUTIVE DIRECTOR TO EXECUTE AND SUBMIT THE 2024 AGENCY PLAN, 2024 MOVE TO WORK (MTW) AMENDMENT TO THE AGENCY PLAN, THE 2024 ANNUAL PLAN WHICH INCLUDES THE CAPITAL FUNDS PLANS AND BUDGETS, ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHERS PROGRAM, THE ANNUAL CONTINUED OCCUPANCY PLAN (ACOP) FOR THE PUBLIC HOUSING PROGRAM, AND OTHER RELATED DOCUMENTS TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR APPROVAL.**

**WHEREAS**, Public Housing Agencies are under the regulations set forth in Public and Indian Housing Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 Notice, 99-51 and 2001-26 requiring the submittal of Public Housing Agency Plans and related certifications; and

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

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

**WHEREAS**, the Housing Authority of the City of Lakeland circulated the 2024 *Agency Plan* to its public housing residents, its Housing Choice Voucher participants, the Resident Advisory Board of the Housing Authority of the City of Lakeland, and other interested parties; and

**WHEREAS**, the Housing Authority of the City of Lakeland conducted public meetings to obtain the public's input and comments on its one-year 2024 MTW Amendment to the Agency Plan.

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

**CERTIFICATE OF COMPLIANCE**

This is to certify that the Board of Commissioners of the Housing Authority of the City of Lakeland has approved and adopted Resolution No. 23-1536, dated September 18, 2023.

Attested by:



**Benjamin Stevenson, Secretary**



**Don Brown, Chairman**

**ATTACHMENT I**  
**Moving to Work Certifications of Compliance**

**CERTIFICATIONS OF COMPLIANCE**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**OFFICE OF PUBLIC AND INDIAN HOUSING**

**Certifications of Compliance with HUD and Federal Requirements and Regulations:**  
**Board Resolution to Accompany Application to the Moving to Work Demonstration Program**

Acting on behalf of the Board of Commissioners of the applicant public housing agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the application to the Moving to Work (MTW) Demonstration Program for the PHA and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the application and implementation thereof:

- (1) The PHA will adhere to the MTW Operations Notice or successor notice and all requirements therein.
- (2) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure at least 75% of families assisted are very low-income as defined in Section 3(b)(2) of the 1937 Act throughout the PHA's participation in the MTW Demonstration Program.
- (3) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in establishing a reasonable rent policy that is designed to encourage employment and self-sufficiency.
- (4) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to assist substantially the same total number of eligible low-income families as would have been served absent MTW throughout the PHA's participation in the MTW Demonstration Program.
- (5) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to maintain a comparable mix of families (by family size) as would have been provided had the funds not been used under the MTW Demonstration Program throughout the PHA's participation in the MTW Demonstration Program.
- (6) The PHA will adhere to HUD guidance in the MTW Operations Notice or successor notice in continuing to ensure housing assisted under the MTW Demonstration Program meets housing quality standards established or approved by the Secretary throughout the PHA's participation in the MTW Demonstration Program.
- (7) The PHA published a notice that a hearing would be held, that the application and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the application by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the application and invited public comment.
- (8) The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the application by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the application.

- (9) The PHA certifies that the Board of Commissioners has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (10) The PHA certifies that it will carry out its application in conformity with: Title VI of the Civil Rights Act of 1964 (42 USC 2000d-2000d-4); the Fair Housing Act (42 USC 3601-19); Section 504 of the Rehabilitation Act of 1973 (29 USC 794); Title II of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.); all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and that it will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)).
- (11) The PHA will carry out its plan in conformity with HUD's Equal Access Rule at 24 CFR 5.105(a)(2) and will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (12) The application is consistent with the applicable Comprehensive Plan (or any plan incorporating such provisions of the Comprehensive Plan) for the jurisdiction in which the PHA is located.
- (13) The application certifies that according to the appropriate State or local officials that the application is consistent with the applicable Consolidated Plan.
- (14) The PHA complies with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (15) The PHA complies with the Violence Against Women Act and its implementing regulations at 24 C.F.R. Part 5, Subpart L and Parts 960 and 966.
- (16) The PHA complies with the Architectural Barriers Act of 1968 and its implementing regulations at 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (17) The PHA complies with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.
- (18) The PHA complies with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (19) The PHA complies with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (20) The PHA complies with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (21) The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (22) The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (23) With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (24) The PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (25) The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (26) The PHA will comply with the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards at 2 CFR Part 200.
- (27) The application and all attachments are available at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

**The Housing Authority of the City Of Lakeland**  
**PHA NAME**

FL011  
**PHA NUMBER/HA CODE**

*I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.S. §3729, 3802).*

Don Brown  
**NAME OF AUTHORIZED OFFICIAL\***

Chairperson  
**TITLE**

Don Brown  
**SIGNATURE**

9/18/2023  
**DATE**

**\* Must be signed by either the Chairperson or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

**PHA Board Resolution**  
Approving Operating Budget

**U.S. Department of Housing  
and Urban Development**  
Office of Public and Indian Housing -  
Real Estate Assessment Center (PIH-REAC)

OMB No. 2577-0026  
(exp. 06/30/2022)

**Public reporting burden** for this collection of information is estimated to average **10 minutes 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. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

This information is required by Section 6(c)(4) of the U.S. Housing Act of 1937. The information is the operating budget for the low-income public housing program and provides a summary of the proposed/budgeted receipts and expenditures, approval of budgeted receipts and expenditures, and justification of certain specified amounts. HUD reviews the information to determine if the operating plan adopted by the public housing agency (PHA) and the amounts are reasonable, and that the PHA is in compliance with procedures prescribed by HUD. Responses are required to obtain benefits. This information does not lend itself to confidentiality.

PHA Name: The Housing Authority of the City of Lakeland

PHA Code: FL011

PHA Fiscal Year Beginning: 01/01/2024

Board Resolution Number: 23-1537

Acting on behalf of the Board of Commissioners of the above-named PHA as its Chairperson, I make the following certifications and agreement to the Department of Housing and Urban Development (HUD) regarding the Board's approval of (check one or more as applicable):

	<u>DATE</u>
<input checked="" type="checkbox"/> Operating Budget approved by Board resolution on:	09/18/2023
<input checked="" type="checkbox"/> Operating Budget submitted to HUD, if applicable, on:	09/30/2023
<input checked="" type="checkbox"/> Operating Budget revision approved by Board resolution on:	09/18/2023
<input type="checkbox"/> Operating Budget revision submitted to HUD, if applicable, on:	

I certify on behalf of the above-named PHA that:

1. All statutory and regulatory requirements have been met;
2. The PHA has sufficient operating reserves to meet the working capital needs of its developments;
3. Proposed budget expenditure are necessary in the efficient and economical operation of the housing for the purpose of serving low-income residents;
4. The budget indicates a source of funds adequate to cover all proposed expenditures;
5. The PHA will comply with the wage rate requirement under 24 CFR 968.110(c) and (f); and
6. The PHA will comply with the requirements for access to records and audits under 24 CFR 968.110(i).

I hereby certify that all the information stated within, as well as any information provided in the accompaniment herewith, if applicable, 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 and 3802)

Print Board Chairperson's Name: <b>Don Brown</b>	Signature: 	Date: <b>09/18/2023</b>
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**MTW CERTIFICATIONS OF COMPLIANCE****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

**Lakeland Housing Authority**

**FL011**

*MTW PHA NAME*

*MTW 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).*

**Don Brown**

**Chairman**

*NAME OF AUTHORIZED OFFICIAL*

*TITLE*

**09/18/2023**

*SIGNATURE*

*DATE*

*\* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

**MTW CERTIFICATIONS OF COMPLIANCE****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

The Housing Authority of the City of Lakeland

FL011

**MTW PHA NAME**

**MTW 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).*

Don Brown

Chairperson

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

**SIGNATURE**

09/18/2023

**DATE**

**\* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

**Civil Rights Certification**  
**(Qualified PHAs)**

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

**Civil Rights Certification**

**Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 01/01/2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

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

The Housing Authority of the City of Lakeland

FL011

PHA Name

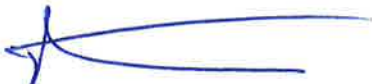
PHA Number/HA Code

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

Name of Executive Director: Benjamin Stevenson

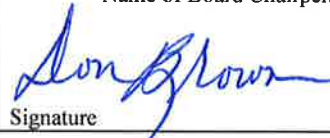
Name of Board Chairperson: Don Brown

Signature



Date 09/18/2023

Signature



Date 09/18/2023

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 *et seq.*, and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

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

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

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

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

I, Carlos R. Pizarro An, the Senior Vice-President of Housing  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2024 and/or Annual PHA Plan for fiscal year 2024 of the Housing Authority of the City of Lakeland is consistent with the  
*PHA Name*

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

Polk County/City of Lakeland

*Local Jurisdiction Name*

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

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

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

Name of Executive Director: Benjamin Stevenson



Signature

Date:09/18/2023

Name Board Chairperson: Don Brown



Signature

Date:09/18/2023

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

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

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

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

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or XX MTW Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 01/01/2024, in connection with the submission of the Plan and implementation thereof:*

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

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

The Housing Authority of the City of Lakeland

FL011

PHA Name

PHA Number/HA Code

Annual MTW PHA Plan for Fiscal Year 2024

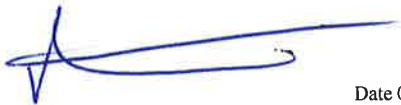
5-Year PHA Plan for Fiscal Years 20\_\_\_\_ - 20\_\_\_\_

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

Name of Executive Director: Benjamin Stevenson

Name Board Chairman: Don Brown

Signature



Date 09/18/2023

Signature



Date 09/18/2023

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

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


## DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known:	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b> Lakeland Housing Authority 430 Hartsell Avenue Lakeland, FL 33815-4502  Congressional District, if known:	
<b>6. Federal Department/Agency:</b> HUD-Department of Housing and Urban Development	<b>7. Federal Program Name/Description:</b> Moving to Work Demonstration-Cohort #4  CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$	
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI): N/A	<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI): N/A	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: Mr. Benjamin Stevenson Title: Executive Director Telephone No.: 863-687-2911 Ext. 1021      Date: 009/18/2023	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

**Certification of Consistency  
with the Consolidated Plan****U.S. Department of Housing  
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: Lakeland Housing AuthorityProject Name: Moving to Work (MTW) Cohort #4Location of the Project: 430 Hartsell Avenue  
Lakeland, FL 33815-4502Name of the Federal  
Program to which the  
applicant is applying: Moving to Work (MTW) Cohort #4Name of  
Certifying Jurisdiction: City of LakelandCertifying Official  
of the Jurisdiction  
Name: Benjamin StevensonTitle: Executive DirectorSignature: Date: 09/18/2023

# Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Lakeland Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Demonstration Project, Cohort #4

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Mr. Benjamin Stevenson

Title

Executive Director

Signature

Date (mm/dd/yyyy)

09/18/2023

**RESOLUTION NO. 23-1537**

**APPROVAL OF THE 2024 PUBLIC HOUSING ANNUAL BUDGET FOR THE  
HOUSING AUTHORITY OF THE CITY OF LAKELAND**

**WHEREAS**, the Board of Commissioners of the Housing Authority of the City of Lakeland has reviewed the proposed 2024 Annual Budgets for the Public Housing program currently administered by the Housing Authority of the City of Lakeland; and

**WHEREAS**, the Board of Commissioners of the Housing Authority of the City of Lakeland has determined that the proposed expenditures are necessary for the efficient and effective operation of the Housing Authority of the City of Lakeland and ensure fulfilment of its mission to provide affordable housing opportunities for very low-, low- and moderate-income families in the City of Lakeland and Polk County, Florida; and

**WHEREAS**, the proposed expenditures will be consistent with the provisions of federal, state and local law and the Annual Contributions Contract between the Housing Authority of the City of Lakeland and the U.S. Department of Housing and Urban Development.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Lakeland hereby approves the 2024 Annual Budget for the Public Housing program (which includes AMP 1 through 7) currently administered by the Housing Authority of the City of Lakeland.

**CERTIFICATE OF COMPLIANCE**

This is to certify that the Board of Commissioners of the Housing Authority of the City of Lakeland has approved and adopted this Resolution No. 23-1537, dated September 18, 2023.

Attested by:



Benjamin Stevenson, Secretary



Don Brown, Chairman

**PHA Board Resolution**  
Approving Operating Budget

**U.S. Department of Housing  
and Urban Development**  
Office of Public and Indian Housing -  
Real Estate Assessment Center (PIH-REAC)

OMB No. 2577-0026  
(exp. 06/30/2022)

Public reporting burden for this collection of information is estimated to average 10 minutes 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. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

This information is required by Section 6(c)(4) of the U.S. Housing Act of 1937. The information is the operating budget for the low-income public housing program and provides a summary of the proposed/budgeted receipts and expenditures, approval of budgeted receipts and expenditures, and justification of certain specified amounts. HUD reviews the information to determine if the operating plan adopted by the public housing agency (PHA) and the amounts are reasonable, and that the PHA is in compliance with procedures prescribed by HUD. Responses are required to obtain benefits. This information does not lend itself to confidentiality.

PHA Name: The Housing Authority of the City of Lakeland

PHA Code: FL011

PHA Fiscal Year Beginning: 01/01/2024

Board Resolution Number: 23-1537

Acting on behalf of the Board of Commissioners of the above-named PHA as its Chairperson, I make the following certifications and agreement to the Department of Housing and Urban Development (HUD) regarding the Board's approval of (check one or more as applicable):

DATE


- |                                     |  |            |
|-------------------------------------|--|------------|
| <input checked="" type="checkbox"/> | Operating Budget approved by Board resolution on:              | 09/18/2023 |
| <input checked="" type="checkbox"/> | Operating Budget submitted to HUD, if applicable, on:          | 09/30/2023 |
| <input checked="" type="checkbox"/> | Operating Budget revision approved by Board resolution on:     | 09/18/2023 |
| <input type="checkbox"/>            | Operating Budget revision submitted to HUD, if applicable, on: |            |

I certify on behalf of the above-named PHA that:

1. All statutory and regulatory requirements have been met;
2. The PHA has sufficient operating reserves to meet the working capital needs of its developments;
3. Proposed budget expenditure are necessary in the efficient and economical operation of the housing for the purpose of serving low-income residents;
4. The budget indicates a source of funds adequate to cover all proposed expenditures;
5. The PHA will comply with the wage rate requirement under 24 CFR 968.110(c) and (f); and
6. The PHA will comply with the requirements for access to records and audits under 24 CFR 968.110(i).

I hereby certify that all the information stated within, as well as any information provided in the accompaniment herewith, if applicable, 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 and 3802)

Print Board Chairperson's Name: Don Brown	Signature: 	Date: 09/18/2023
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AMP 1-LHA Owned (amp1)  
2024 Budget

	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Total
4198-07-000 Telephone	800.00	800.00	800.00	800.00	800.00	800.00	800.00	800.00	800.00	800.00	800.00	800.00	9,600.00
4198-08-000 Postage	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4198-09-000 Computer Software License Fee/Exp	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	2,163.97	25,967.64
4198-10-000 Copiers - Lease & Service	260.00	260.00	260.00	260.00	260.00	260.00	260.00	260.00	260.00	260.00	260.00	260.00	3,120.00
4198-11-000 IT Contract Fees	950.00	950.00	950.00	950.00	950.00	950.00	950.00	950.00	950.00	950.00	950.00	950.00	11,400.00
4198-12-000 Street Office Equipment	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4198-13-000 IT Contract Fees	900.00	900.00	900.00	900.00	900.00	900.00	900.00	900.00	900.00	900.00	900.00	900.00	10,800.00
4198-14-000 Bank Fees - Unreimbursed	85.56	85.56	85.56	85.56	85.56	85.56	85.56	85.56	85.56	85.56	85.56	85.56	1,026.72
4198-15-000 Other Misc Admin Expenses	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	1,800.00
4198-16-000 Other Computer-Permits	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4198-17-000 Office Cleaning and Repairs	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	120.00
4198-18-000 Office Sewer	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	120.00
4198-19-000 Total Miscellaneous Admin Expenses	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	5,604.53	67,254.36
TOTAL ADMINISTRATIVE EXPENSES	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	21,843.74	262,124.91
4200-00-000 TENANT SERVICES													
4200-00-000 Resident Functions	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00	120.00	1,440.00
4200-00-000 Resident Services Exp	75.00	75.00	75.00	75.00	75.00	75.00	75.00	75.00	75.00	75.00	75.00	75.00	900.00
4200-00-000 TOTAL TENANT SERVICES EXPENSES	195.00	195.00	195.00	195.00	195.00	195.00	195.00	195.00	195.00	195.00	195.00	195.00	2,340.00
4300-00-000 UTILITIES													
4310-00-000 Water	969.97	969.97	969.97	969.97	969.97	969.97	969.97	969.97	969.97	969.97	969.97	969.97	11,639.64
4320-00-000 Electricity	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	2,298.10	27,777.20
4340-00-000 Garbage/Trash Removal	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	4,638.55	55,662.60
4390-00-000 Sewer	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	2,086.65	25,039.80
4399-00-000 TOTAL UTILITY EXPENSES	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	9,993.27	119,119.24
4400-00-000 MAINTENANCE AND OPERATIONS													
4400-99-000 General Maint Expense													
4410-00-000 Maintenance Salaries	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	4,270.21	51,242.52
4410-06-000 401K-401A Maintenance	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	2,049.70
4410-07-000 Payroll Taxes Maintenance	341.62	341.62	341.62	341.62	341.62	341.62	341.62	341.62	341.62	341.62	341.62	341.62	4,099.40
4410-08-000 Health/Life Insurance Maint.	760.05	760.05	760.05	760.05	760.05	760.05	760.05	760.05	760.05	760.05	760.05	760.05	9,120.60
4410-09-000 Workers Comp Maintenance	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	170.81	2,049.70
4410-10-000 Payroll Prep Fees Maint.	42.70	42.70	42.70	42.70	42.70	42.70	42.70	42.70	42.70	42.70	42.70	42.70	512.43
4410-11-000 Legal Shield - Maint.	97.78	97.78	97.78	97.78	97.78	97.78	97.78	97.78	97.78	97.78	97.78	97.78	1,173.36
4411-00-000 Maintenance Uniforms	235.22	235.22	235.22	235.22	235.22	235.22	235.22	235.22	235.22	235.22	235.22	235.22	2,822.64
4411-00-000 Vehicle Repairs/Maint. - Gas, Oil, Grease	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	2,400.00
4411-00-000 Total General Maint Expense	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	6,289.20	75,470.35
4420-00-000 Materials													
4420-01-000 Supplies-Grounds	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-02-000 Supplies-Plumbing	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-03-000 Supplies-Printing/Decorating	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-03-100 Window Treatments	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-03-200 Electrical - Supplies/Fixtures	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-04-000 Supplies-Stationery/Shipping	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-05-000 Restos - Materials & Supplies	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	1,800.00
4420-07-000 Supplies-Plumbing	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-08-000 Supplies-Tools Equipment	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-09-100 Security Equipment, Locks, Alarms	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-10-000 Maint. - Miscellaneous Supplies	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	600.00
4420-10-100 Countertops/Cabinets	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	600.00
4420-10-200 Carpet and Flooring Supplies	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4420-11-000 Supplies-HVAC	225.00	225.00	225.00	225.00	225.00	225.00	225.00	225.00	225.00	225.00	225.00	225.00	2,700.00
4420-12-000 Supplies-Painting	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4420-12-000 Total Materials	775.00	775.00	775.00	775.00	775.00	775.00	775.00	775.00	775.00	775.00	775.00	775.00	9,300.00
4430-00-000 Contract Costs													
4430-01-000 Contract-Fire Alarm/Extinguisher	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	600.00
4430-03-000 Contract-Building Repairs - Exterior	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	600.00

AMP 1-LHA Owned (.amp1)  
2024 Budget

	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Total
4430-03-100	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	600.00
4430-03-300	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4430-07-000	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	400.00	4,800.00
4430-11-000	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	300.00
4430-13-000	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	500.00	6,000.00
4430-14-000	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	200.00	2,400.00
4430-15-000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4430-23-000	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	4,500.00	54,000.00
4430-24-000	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	24,000.00
4430-24-300	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	12,000.00
4430-27-000	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	1,110.69	13,328.28
4430-28-000	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	1,200.00
4430-99-000	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	10,010.69	120,128.28
4999-00-000	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	17,074.89	204,894.83
TOTAL MAINTENANCE EXPENSES													
GENERAL EXPENSES													
4510-00-000	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	6,738.31	80,859.72
4510-01-000	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	1,408.05	16,896.60
4599-00-000	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	8,146.36	97,756.32
TOTAL GENERAL EXPENSES													
HOUSING ASSISTANCE PAYMENTS													
4700-00-000													
4715-01-001	80.00	80.00	80.00	80.00	80.00	80.00	80.00	80.00	80.00	80.00	80.00	80.00	960.00
4715-03-000	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	150.00	1,800.00
4799-00-000	230.00	230.00	230.00	230.00	230.00	230.00	230.00	230.00	230.00	230.00	230.00	230.00	2,760.00
TOTAL HOUSING ASSISTANCE PAYMENTS													
NON-OPERATING ITEMS													
5000-00-000	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	99,958.20
5100-01-000	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	8,329.85	99,958.20
5199-00-000													
TOTAL DEPRECIATION/AMORTIZATION													
8000-00-000	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	65,813.11	789,757.30
9000-00-000	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-11,839.54	-144,074.46
NET INCOME	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-3,509.69	-42,116.28
5200-00-001	3509.69	3509.69	3509.69	3509.69	3509.69	3509.69	3509.69	3509.69	3509.69	3509.69	3509.69	3509.69	42,116.28
Capital Funds													
NOI after CPF applied	0.00	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.0015	0.018

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

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

**Re: Resolution # 23-1538**  
 The Board of Commissioners is requested to approve the above-referenced resolution to authorize the Executive Director to establish the Fiscal Year 2024 (2023-2024) Payment Standards for Housing Choice Voucher Program participants effective October 1, 2023.

**2. Who is making request:**

- A. Entity: The Housing Authority of the City of Lakeland
- B. re: 2024 Fair Market Rent rates/Payment Standards
- C. Originador: Carlos R. Pizarro An

**3. Cost Estimate:**

n/a

**Narrative:**

In order to provide its Section 8 residents with numerous housing choices for a larger number of families, the Housing Authority of the City of Lakeland must maintain an adequate pool of available housing units. This inventory of available housing units is maintained and enhanced by paying current and prospective landlords a fair and reasonable rent based on the local market.

The Department of Housing and Urban Development has published Final Fiscal Year 2024 (Effective 10/01/2023) Fair Market Rent rates for the Lakeland-Winter Haven Metropolitan Statistical Area with the option to increase/decrease the rent rates by up to 10% depending on the need. After market analysis, the Housing Authority of the City of Lakeland staff determined that in order to maintain the current pool of housing to attract other housing opportunities; and to serve as many families as possible, should adopt the Department of Housing and Urban Development's final rent rates at 110% of the published Fair Market Rent for the jurisdiction its serves.

Therefore, the Housing Authority of the City of Lakeland staff is recommending the following payment standards for its Section 8 program effective October 1,2023 and/or implementing within 90 days of approval for annual certifications.

PAYMENT STANDARDS BY UNIT BEDROOMS					
	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
<b>HUD Final Fiscal Year 2024 Fair Market Rent as published</b>	1006	1012	1250	1679	2121
<b>Proposed Payment Standard 2024 Effective 10/01/2023 (110% of Fair Market Rent)</b>	<b>1106</b>	<b>1113</b>	<b>1375</b>	<b>1846</b>	<b>2333</b>
<b>Current Payment Standard Effective 2023/2023 Effective 10/01/2022 (110% of 2022/2023 Fair Market Rent)</b>	<b>1023</b>	<b>1028</b>	<b>1272</b>	<b>1721</b>	<b>2168</b>

**RESOLUTION NO. 23-1538**

**APPROVING THE PAYMENT STANDARD FOR FISCAL YEAR 2024  
(Effective 10/01/2023)**

**WHEREAS**, the Housing Authority of the City of Lakeland desires to provide its Section 8 eligible residents a wide range of housing units; and

**WHEREAS**, to accomplish this availability, the Housing Authority of the City of Lakeland desires to establish a rent structure that is not only attractive to the current Housing Authority landlords but will also attract future landlords; and

**WHEREAS**, the Department of Housing and Urban Development yearly publishes a Fair Market Rent rate structure.

**WHEREAS**, the Department of Housing and Urban Development establishes in 24CFR982.503 that the PHA may adopt payment standards for the voucher program by unit size for each FMR area in the PHA jurisdiction and, if applicable, for each PHA-designated part of an FMR area, which do not exceed 110 percent of the current applicable FMR and which are not less than 90 percent of the current FMR (unless a lower percent is approved by HUD).

**WHEREAS**, the Housing Authority of the City of Lakeland staff's evaluation of the published Department of Housing and Urban Development rate structure against local market analysis indicated that it would be in the best interest of the Housing Authority's Section 8 residents to increase the Housing Authority of the City of Lakeland's Payment Standards structure at 110% of the Department of Housing and Urban Development's published rate in order to maintain an adequate number of housing units and to increase the number of families participating in the program (see attached matrix);

**NOW THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Lakeland hereby approves its Fiscal Year 2024 Payment Standards to be 110% of the rate published by the Department of Housing and Urban Development--effective October 1, 2023, and/or implementing within 90 days of approval for annual certifications.

**CERTIFICATE OF COMPLIANCE**

This is to certify that the Board of Commissioners of The Housing Authority of the City of Lakeland has approved and adopted this Resolution 23-1538 dated September 18, 2023.

Attested by:



Benjamin Stevenson, Secretary



Don Brown, Chair



# FY 2024 FAIR MARKET RENT DOCUMENTATION SYSTEM

## The FY 2024 Lakeland-Winter Haven, FL MSA FMRs for All Bedroom Sizes

Final FY 2024 & Final FY 2023 FMRs By Unit Bedrooms					
Year	<a href="#">Efficiency</a>	<a href="#">One-Bedroom</a>	<a href="#">Two-Bedroom</a>	<a href="#">Three-Bedroom</a>	<a href="#">Four-Bedroom</a>
FY 2024 FMR	\$1,006	\$1,012	\$1,250	\$1,679	\$2,121
<a href="#">FY 2023 FMR</a>	\$930	\$935	\$1,157	\$1,565	\$1,971

Polk County, FL is part of the Lakeland-Winter Haven, FL MSA, which consists of the following counties: Polk County, FL. All information here applies to the entirety of the Lakeland-Winter Haven, FL MSA.

### Fair Market Rent Calculation Methodology

[Show/Hide Methodology Narrative](#)

Fair Market Rents for metropolitan areas and non-metropolitan FMR areas are developed as follows:

1. **Calculate the Base Rent:** HUD uses 2017-2021 5-year American Community Survey (ACS) estimates of 2-bedroom adjusted standard quality gross rents calculated for each FMR area as the new basis for FY2024, provided the estimate is statistically reliable. For FY2024, the test for reliability is whether the margin of error for the estimate is less than 50% of the estimate itself and whether the ACS estimate is based on at least 100 survey cases. HUD does not receive the exact number of survey cases, but rather a categorical variable known as the count indicator indicating a range of cases. An estimate based on at least 100 cases corresponds to a count indicator of 4 or higher.

If an area does not have a reliable 2017-2021 5-year estimate, HUD checks whether the area has had at least 2 minimally reliable estimates in the past 3 years, or estimates that meet the 50% margin of error test described above. If so, the FY2024 base rent is the average of the inflated ACS estimates.

If an area has not had a minimally reliable estimate in the past 3 years, HUD uses the estimate for the area's corresponding metropolitan area (if applicable) or State non-metropolitan area as the basis for FY2024.

2. **Calculate the Basis for Recent Mover Adjustment Factor**: HUD calculates a recent mover adjustment factor by comparing an ACS 2021 1-year 40th percentile recent mover 2-bedroom rent to the ACS 2017-2021 5-year 40th percentile adjusted standard quality gross rent. If either the recent mover and non-recent mover rent estimates are not reliable, HUD uses the recent mover adjustment for a larger geography. For metropolitan areas, the order of geographies examined is: FMR Area, Entire Metropolitan Area (for Metropolitan Sub-Areas), State Metropolitan Portion, Entire State, and Entire US; for non-metropolitan areas, the order of geographies examined is: FMR Area, State Non-Metropolitan Portion, Entire State, and Entire US. The recent mover adjustment factor is floored at one.

HUD has traditionally defined recent movers as those who have moved into their residence within the current year or preceding year of the ACS survey. Newly for FY2024, HUD is electing to first examine recent movers who have moved within the current year of the ACS. Upon determining a reliable recent mover estimate, HUD calculates the appropriate recent mover adjustment factor between the 5-year data and the 1-year data.

3. **Adjust for Inflation**: In order to calculate rents that are "as of" 2022, HUD applies a gross rent inflation adjustment factor using data from commercial rent data sources and the Consumer Price Index. HUD uses a local measure of private rent inflation for markets that are covered by at least three of the six available sources of private rent data. HUD combines this local measure of rent inflation with either the local metropolitan area CPI rent of primary residence for the 23 areas where such data exist, or the regional CPI rent in areas without a local index.

Unlike in FY 2023, for areas without at least three of the six private rent data sources available, HUD uses a regional average of private rent inflation factors alongside the regional CPI rent of primary residence. HUD constructs the regional average by taking the rental unit weighted average of the change in rents of each area in a region that does have private rent data coverage. HUD averages the private and CPI shelter rent data with the year-to-year change in the CPI housing fuels and utilities index for the area in order to make the resulting inflation measure reflective of gross rents.

The private and CPI gross rent update factors are then combined using a weighting scheme which controls the national weighted average of the private and CPI gross rent factors to the national change in the ACS recent mover gross rent. The resulting weights assigned are as follows:  $W_{2022} = 0.558$  assigned to the private gross rent factor and  $(1 - W_{2022}) = 0.442$  assigned to the CPI gross rent factor.

4. **Calculate the Trend Factor:** To further inflate rents from CY2022 to FY2024, HUD uses a "trend factor" based on the forecast of CPI gross rent changes through FY2024.
5. **Multiply the Factors:** HUD multiplies the base rent by the recent mover factor, the gross rent inflation factor, and the trend factor to produce a rent that is "as of" the current fiscal year.
6. **Compare to the State minimum:** FY2024 FMRs are then compared to a State minimum rent, and any area whose preliminary FMR falls below this value is raised to the level of the State minimum.
7. **Calculate Bedroom Ratios:** HUD calculates "bedroom ratios" and multiplies these by the two-bedroom rent to produce preliminary FMRs for unit sizes other than two bedrooms.
8. **Compare to Last Year's FMR:** FY2024 FMRs may not be less than 90% of FY2023 FMRs. Therefore, HUD applies "floors" based on the prior year's FMRs.

### **The results of the Fair Market Rent Step-by-Step Process**

1. **Base Rent Calculation**

The following are the 2021 American Community Survey 5-year 2-Bedroom Adjusted Standard Quality Gross Rent estimates and margins of error for Lakeland-Winter Haven, FL MSA.

Area	ACS <sub>2021</sub> 5-Year 2-Bedroom Adjusted Standard Quality Gross Rent	ACS <sub>2021</sub> 5-Year 2-Bedroom Adjusted Standard Quality Gross Rent Margin of Error	Ratio	Sample Size Category	Result

Lakeland-Winter Haven, FL MSA	<u>\$936</u>	\$19	\$19 / \$936=0.02030	6	0.02030 < .5 6 ≥ 4
					Use ACS <sub>2021</sub> 5-Year Lakeland-Winter Haven, FL MSA 2-Bedroom Adjusted Standard Quality Gross Rent

Since the ACS<sub>2021</sub> Margin of Error Ratio is less than .5, HUD uses the ACS<sub>2021</sub> Lakeland-Winter Haven, FL MSA value for the estimate of 2-Bedroom Adjusted Standard Quality Gross Rent (Base Rent).

Area	FY2024 Base Rent
Lakeland-Winter Haven, FL MSA	\$936

2. **Recent Mover Adjustment Factor Calculation**  
 A recent mover adjustment factor is applied based on the smallest area of geography containing Lakeland-Winter Haven, FL MSA that has an ACS<sub>2021</sub> 1-year Adjusted Standard Quality Recent-Mover estimate with a Margin of Error Ratio that is less than .5 and a sufficient number of sample cases.

Area	ACS <sub>2021</sub> 1-Year Adjusted Standard Quality Recent-Mover Gross Rent	ACS <sub>2021</sub> 1-Year Adjusted Standard Quality Recent-Mover Gross Rent Margin of Error	Ratio	Sample Size Category	Result
Lakeland-Winter Haven, FL MSA - ACS 1-year 2 Bedroom	<u>\$99Z</u>	\$205	0.206	1	1 < 4 Do Not Use ACS <sub>2021</sub> 1-Year Lakeland-Winter Haven, FL MSA 2-Bedroom Adjusted Standard Quality Recent-Mover Gross Rent
Lakeland-Winter Haven, FL MSA -	<u>\$1,074</u>	\$87	0.081	3	3 < 4 Do Not Use ACS <sub>2021</sub> 1-Year

Area	ACS <sub>2021</sub> 1-Year Adjusted Standard Quality Recent-Mover Gross Rent	ACS <sub>2021</sub> 1-Year Adjusted Standard Quality Recent-Mover Gross Rent Margin of Error	Ratio	Sample Size Category	Result
ACS 1-year All Bedroom					Lakeland-Winter Haven, FL MSA All Bedroom Adjusted Standard Quality Recent-Mover Gross Rent
Lakeland-Winter Haven, FL MSA -- ACS 2-year 2 Bedroom	<u>\$1,008</u>	\$125	0.124	3	3 < 4 Do Not Use ACS <sub>2021</sub> 1-Year Lakeland-Winter Haven, FL MSA 2 Bedroom Adjusted Standard Quality Recent-Mover Gross Rent
Lakeland-Winter Haven, FL MSA -- ACS 2-year All Bedroom	<u>\$1,047</u>	\$75	0.072	6	0.072 < .5 6 ≥ 4 Use ACS <sub>2021</sub> 1-Year Lakeland-Winter Haven, FL MSA All Bedroom Adjusted Standard Quality Recent-Mover Gross Rent

The calculation of the relevant Recent-Mover Adjustment Factor for Lakeland-Winter Haven, FL MSA is as follows:

ACS <sub>2021</sub> 5-Year Area	ACS <sub>2021</sub> 5-Year 40th Percentile Adjusted Standard Quality Gross Rent	ACS <sub>2021</sub> 1-Year 40th Percentile Adjusted Standard Quality Recent-Mover Gross Rent
Lakeland-Winter Haven, FL MSA -- All Bedroom	<u>\$988</u>	<u>\$1,047</u>

Area	Ratio	Recent-Mover Adjustment Factor
Lakeland-Winter Haven, FL MSA	$\frac{\$1,047}{\$988} = 1.060$	$1.0597 \geq 1.0$ Use calculated Recent-Mover Adjustment Factor of 1.0597

### 3. Inflation Adjustment Factor Calculation

A gross rent inflation adjustment factor is applied based on a weighted average of a private source gross rent inflation factor and a Consumer Price Index gross rent inflation factor. Since Lakeland-Winter Haven, FL MSA is covered by at least 3 private data sources, a local-based private rent factor is applied. Furthermore, since Lakeland-Winter Haven, FL MSA is not covered by a local-CPI rent area, a Region-based CPI gross rent factor is applied.

Components of 2022 Inflation Adjustment Factor for Lakeland-Winter Haven, FL MSA					
	$R_{2022} = \text{Shelter Rent Change, 2021 to 2022}$	$U_{2022} = \text{CPI Annual Utilities Change, 2021 to 2022}$	$C_{2022} = \text{ACS Utility Cost as a Percent of Gross Rent}$	$\text{Gross Rent Inflation Factor Calculation} = (R_{2022} \times (1 - C_{2022}) + U_{2022} \times C_{2022})$	Inflation Factor Type
$P_{2022} = \text{Private Inflation Factor}$	1.15799	1.11945	0.16531	$(1.15799 \times 0.83469) + (1.11945 \times 0.16531) = 1.15162$	Local
$CPI_{2022} = \text{CPI Inflation Factor}$	1.07809	1.11945	0.15146	$(1.07809 \times 0.84854) + (1.11945 \times 0.15146) = 1.08435$	Region

The 2022 Gross Rent Inflation Factor for Lakeland-Winter Haven, FL MSA is computed as follows:

$$= CPI_{2022} \times (1 - W_{2022}) + P_{2022} \times W_{2022}$$

$$= (1.08435 \times 0.442) + (1.15162 \times 0.558)$$

$$= (0.479283) + (0.642604)$$

$$= \mathbf{1.12191}$$

4. **Trend Factor Adjustment**

The calculation of the Trend Factor is as follows: HUD forecasts the change in gross rents from 2022 to 2024 for each CPI area and Census Region. This makes Fair Market Rents "as of" FY2024.

	<b>Trend Factor</b>	<b>Trend Factor Type</b>
Trend Factor	<u>1.12352</u>	Region

5. **Combination of Factors**

The FY 2024 2-Bedroom Fair Market Rent for Lakeland-Winter Haven, FL MSA is calculated as follows:

<b>Area</b>	<b><u>Base Rent</u></b>	<b><u>Recent-Mover Adjustment Factor</u></b>	<b><u>Annual 2021 to 2022 Gross Rent Inflation Adjustment</u></b>	<b><u>Trending 2022 to FY2024</u></b>	<b>FY 2024 2-Bedroom FMR</b>
Lakeland-Winter Haven, FL MSA	\$936 *	1.0597 *	1.12191 *	1.12352 =	\$1,250

6. **State Minimum Comparison**

In keeping with HUD policy, the preliminary FY 2024 FMR is checked to ensure that it does not fall below the state minimum.

<b>Area</b>	<b>Preliminary FY2024 2-Bedroom FMR</b>	<b>FY 2024 Florida State Minimum</b>	<b>Final FY2024 2-Bedroom FMR</b>
Lakeland-Winter Haven, FL MSA	\$1,250	<u>\$905</u>	\$1,250 ≥ \$905 Use Lakeland-Winter Haven, FL MSA FMR of \$1,250

**7. Bedroom Ratios Application**

Bedroom ratios are applied to calculate FMRs for unit sizes other than two bedrooms.

Click on the links in the table to see how the bedroom ratios are calculated.

<b>FY 2024 FMRs By Unit Bedrooms</b>					
	<a href="#">Efficiency</a>	<a href="#">One-Bedroom</a>	<a href="#">Two-Bedroom</a>	<a href="#">Three-Bedroom</a>	<a href="#">Four-Bedroom</a>
FY 2024 FMR	\$1,006	\$1,012	\$1,250	\$1,679	\$2,121

**8. Comparison to Previous Year**

The FY2024 FMRs for each bedroom size must not be below 90% of the FY2023 FMRs.

	<b>Efficiency</b>	<b>One-Bedroom</b>	<b>Two-Bedroom</b>	<b>Three-Bedroom</b>	<b>Four-Bedroom</b>
FY2023 FMR	\$930	\$935	\$1,157	\$1,565	\$1,971
FY2023 floor	\$837	\$842	\$1,042	\$1,409	\$1,774
FY 2024 FMR	\$1,006	\$1,012	\$1,250	\$1,679	\$2,121
Use FY2023 floor for FY2024?	No	No	No	No	No

**Final FY2024 Rents for All Bedroom Sizes for Lakeland-Winter Haven, FL MSA**

<b>Final FY 2024 FMRs By Unit Bedrooms</b>					
	<b>Efficiency</b>	<b>One-Bedroom</b>	<b>Two-Bedroom</b>	<b>Three-Bedroom</b>	<b>Four-Bedroom</b>
Final FY 2024 FMR	\$1,006	\$1,012	\$1,250	\$1,679	\$2,121

The FMRs for unit sizes larger than four bedrooms are calculated by adding 15 percent to the four bedroom FMR, for each extra bedroom. For example, the FMR for a five bedroom unit is 1.15 times the four bedroom FMR, and the FMR for a six bedroom unit is 1.30 times the four bedroom FMR. FMRs for single-room occupancy units are 0.75 times the zero bedroom (efficiency) FMR.

Permanent link to this page: [http://www.huduser.gov/portal/datasets/fmr/fmrs/FY2024\\_code/2024summary.odn?&year=2024&fmrtype=Final&selection\\_type=county&fips=12105999999](http://www.huduser.gov/portal/datasets/fmr/fmrs/FY2024_code/2024summary.odn?&year=2024&fmrtype=Final&selection_type=county&fips=12105999999)

### Select a different area

Press below to select a different county within the same state (same primary state for metropolitan areas):

Alachua County, FL  
Baker County, FL  
Bay County, FL  
Bradford County, FL  
Brevard County, FL

Select a new county

Press below to select a different state:

Select a new state

Select a Final FY 2024 Metropolitan FMR Area:

Lakeland-Winter Haven, FL MSA

Select Metropolitan FMR Area

[HUD Home Page](#) | [HUD User Home](#) | [Data Sets](#) | [Fair Market Rents](#) | [Section 8 Income Limits](#) | [FMR/IL Summary System](#) | [Multifamily Tax Subsidy Project \(MTSP\) Income Limits](#) | [HUD LIHTC Database](#)

Prepared by the [Program Parameters and Research Division](#), HUD. Technical problems or questions? [Contact Us](#).

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

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

**Re: Resolution # 23-1539**

The Board of Commissioners is requested to approve the above-referenced resolution to authorize revisions to the current utility allowance schedule for both the Public Housing and the Housing Choice Voucher participants.

**2. Who is making request:**

A. Entity: The Housing Authority of the City of Lakeland

B. Project: Implement the annual utility allowance schedules for participants in the Public Housing and HCV programs effective October 1, 2023.

C. Originator: Carlos R. Pizarro An

**3. Cost Estimate:**

N/A

**Narrative:**

The U.S. Department of Housing and Urban Development requires the Lakeland Housing Authority to review its utility allowances annually. The review shall include all changes in circumstances involved with completion of modernization and/or other energy conservation measures implemented by the Lakeland Housing Authority which would lead to a change in reasonable consumption requirements and changes in utility rates.

The utility allowance survey method is the preferred method of obtaining current utility rates and charges for the Public Housing and Section 8 Housing Choice Voucher programs. The outcome of this study enables the Lakeland Housing Authority to update the current utility allowance schedule.

*Resident Life Utility Allowances*, a division of The Nelrod Company, was selected as the consulting firm for the utility allowance study. The Nelrod Company has over twenty years of experience in federal, state, and local government consulting services in the following areas:

- Financial Management and Capital Fund Program
- Agency Plans and Policies
- PHAS
- SEMAP

- HQS
- Family Self Sufficiency
- Reasonable Rent Determination
- Utility Allowances
- Energy Audits
- Physical Needs Assessments

Based on previous experience and work history, the Lakeland Housing Authority engaged the *Resident Life Utility Allowances* firm to conduct the utility allowance study for the Public Housing program and Section 8 participants.

#### OBJECTIVE

The objective of the study was to update the utility allowances with current utility supplier rates and charges for electricity, natural gas, water and sewer from the City, County, and other jurisdictions. The methodology used to analyze the current utility allowances included a review of Monthly Consumption Allowances, Rate Information Gathering, Computation of Consumption Costs, submission of Section 8 and Public Housing HUD Forms, gathering Supporting Documentation, and implementing the updated allowances within 90 days of approval.

#### PRESENT SITUATION

The Lakeland Housing Authority has a current utility allowance schedule that will be updated with the new utility allowance schedule (please see attached forms) based on the *Resident Life Utility Allowances* survey. The summary of the complete survey, including a comparison of current allowance with the proposed allowances, is attached to this resolution.

#### ANTICIPATED OUTCOME

By approving this Resolution, the Lakeland Housing Authority will be able to implement the updated utility allowances for its programs and become compliant with the U.S. Department of Housing and Urban Development mandated utility allowance regulation 24 CFR 965.507 (b).

#### WHO BENEFITS

The Public Housing residents and the Section 8 participants being serviced by the Lakeland Housing Authority will directly benefit from the updated utility allowance schedule.

**RESOLUTION NO. 23-1539**

**APPROVAL OF THE REVISED PUBLIC HOUSING AND HOUSING CHOICE VOUCHER UTILITY ALLOWANCE SCHEDULES**

**WHEREAS**, the Housing Authority of the City of Lakeland is required by the United States Department of Housing and Urban Development to ensure that its Public Housing program and its Housing Choice Voucher (Section 8) program review and, if necessary, update the utility allowances for program participants on an annual basis; and

**WHEREAS**, after a study was conducted to review the Housing Authority of the City of Lakeland's utility allowance schedules, and

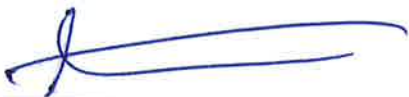
**WHEREAS**, it was determined that it is necessary to make adjustments to the Housing Authority of the City of Lakeland utility allowance schedules.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Lakeland hereby approves the updated Public Housing utility allowance schedules and Housing Choice Voucher (Section 8) utility allowance schedules to become effective on October 1, 2023, and/or implementing effective ninety (90) days from the approval date for annual certifications.

**CERTIFICATE OF COMPLIANCE**

This is to certify that the Board of Commissioners of the Housing Authority of the City of Lakeland has approved and adopted Resolution No. 23-1539, dated September 18, 2023.

Attested by:



Benjamin Stevenson, Secretary



Don Brown, Chairman

# Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval No. 2577-0169  
(exp. 04/30/2026)

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

Locality/PHA <b>Lakeland Housing Authority, FL</b>		Unit Type: <b>Multi-Family (High-Rise/Apartment/ Row House/Townhouse/Semi-Detached/Duplex)</b>				Date (mm/dd/yyyy) 10/01/2023	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heating	Natural Gas	\$11.00	\$14.00	\$14.00	\$14.00	\$16.00	\$16.00
	Bottle Gas	\$46.00	\$57.00	\$57.00	\$57.00	\$62.00	\$62.00
	Electric (avg)	\$8.00	\$9.00	\$10.00	\$11.00	\$12.00	\$12.00
	Electric Heat Pump (avg)	\$6.00	\$7.00	\$9.00	\$10.00	\$11.00	\$12.00
	Fuel Oil						
Cooking	Natural Gas	\$4.00	\$4.00	\$7.00	\$9.00	\$11.00	\$13.00
	Bottle Gas	\$15.00	\$15.00	\$26.00	\$36.00	\$46.00	\$51.00
	Electric (avg)	\$6.00	\$7.00	\$11.00	\$14.00	\$17.00	\$21.00
Other Electric	(avg)	\$24.00	\$28.00	\$39.00	\$50.00	\$61.00	\$71.00
Air Conditioning	(avg)	\$20.00	\$24.00	\$33.00	\$42.00	\$51.00	\$61.00
Water Heating	Natural Gas	\$9.00	\$10.00	\$14.00	\$18.00	\$23.00	\$27.00
	Bottle Gas	\$36.00	\$41.00	\$57.00	\$72.00	\$87.00	\$108.00
	Electric (avg)	\$14.00	\$16.00	\$20.00	\$25.00	\$29.00	\$34.00
	Fuel Oil						
Water	(avg)	\$20.00	\$20.00	\$24.00	\$29.00	\$34.00	\$39.00
Sewer	(avg)	\$40.00	\$41.00	\$47.00	\$54.00	\$60.00	\$65.00
Trash Collection	(avg)	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00
<b>Other specify: Electric Charge \$12.45 (avg)</b>		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
<b>Other specify: Natural Gas Charge \$16.61</b>		\$17.00	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
Range /Microwave		\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00
Refrigerator		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
<b>Actual Family Allowances</b> -May be used by the family to compute allowance while searching for a unit.					Utility/Service/Appliance	Allowance	
Head of Household Name					Heating		
Unit Address					Cooking		
					Other Electric		
					Air Conditioning		
					Water Heating		
Number of Bedrooms					Water		
					Sewer		
					Trash Collection		
					Other		
					Range/Microwave		
					Refrigerator		
					Total		



adapted from form HUD-52667  
(04/2023)

# Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval No. 2577-0169  
(exp. 04/30/2026)

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

Locality/PHA <b>Lakeland Housing Authority, FL</b>		Unit Type <b>Single-Family</b> <b>(Detached House/Mobile Home)</b>				Date (mm/dd/yyyy) 10/01/2023	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heating	Natural Gas	\$17.00	\$20.00	\$20.00	\$21.00	\$21.00	\$23.00
	Bottle Gas	\$67.00	\$77.00	\$77.00	\$82.00	\$82.00	\$87.00
	Electric (avg)	\$12.00	\$14.00	\$15.00	\$16.00	\$17.00	\$18.00
	Electric Heat Pump (avg)	\$9.00	\$11.00	\$13.00	\$14.00	\$16.00	\$17.00
	Fuel Oil						
Cooking	Natural Gas	\$4.00	\$4.00	\$7.00	\$9.00	\$11.00	\$13.00
	Bottle Gas	\$15.00	\$15.00	\$26.00	\$36.00	\$46.00	\$51.00
	Electric (avg)	\$6.00	\$7.00	\$11.00	\$14.00	\$17.00	\$21.00
Other Electric	(avg)	\$35.00	\$41.00	\$57.00	\$73.00	\$89.00	\$105.00
Air Conditioning	(avg)	\$16.00	\$18.00	\$41.00	\$64.00	\$87.00	\$110.00
Water Heating	Natural Gas	\$10.00	\$11.00	\$17.00	\$23.00	\$27.00	\$33.00
	Bottle Gas	\$41.00	\$46.00	\$67.00	\$87.00	\$108.00	\$128.00
	Electric (avg)	\$17.00	\$20.00	\$25.00	\$31.00	\$37.00	\$42.00
	Fuel Oil						
Water	(avg)	\$20.00	\$20.00	\$24.00	\$29.00	\$34.00	\$39.00
Sewer	(avg)	\$40.00	\$41.00	\$47.00	\$54.00	\$60.00	\$65.00
Trash Collection	(avg)	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00
<b>Other specify: Electric Charge \$12.45 (avg)</b>		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
<b>Other specify: Natural Gas Charge \$16.61</b>		\$17.00	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
Range /Microwave		\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00
Refrigerator		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
<b>Actual Family Allowances</b> -May be used by the family to compute allowance while searching for a unit.					Utility/Service/Appliance	Allowance	
Head of Household Name					Heating		
Unit Address					Cooking		
					Other Electric		
					Air Conditioning		
					Water Heating		
Number of Bedrooms					Water		
					Sewer		
					Trash Collection		
					Other		
Number of Bedrooms					Range / Microwave		
					Refrigerator		
					Total		



adapted from form HUD-52667  
(04/2023)

Housing Agency:

Lakeland Housing Authority

### Customization & Energy Efficiency Measures for Base Ekotrope Models

Please check appropriate box(s) for **each development/property** and note if different for other bedroom sizes in property. NOTE: Use separate form if criteria is different for BR sizes or more than one building type per property. **Blue text represents energy efficiency measures/equipment.**

Development Name & No.: Cecil Gober Villas

Building: Year Built: 1981 Structure Type:  Apt  High-Rise  RH  SD  DH

Legend: Apt=Apartment (low-rise/mid-rise), RH=Row House/Townhouse, SD=Semi-Detached/Duplex, DH=Detached House

Resident-Paid Utilities:  Electric  Natural Gas  Water  Sewer  Trash

Agency-Paid Check-Metered Utilities:  Electric  Natural Gas  Water

OR  All Utilities are Master Metered (Paid by the Agency) (Stop here if ALL utilities are Master Metered)

Bedroom Sizes:  0BR/EFF  1BR  2BR  3BR  4BR  5BR  6BR

1 Foundation Type:  Concrete Slab  Pier-Beam (Crawl Space)  Basement

2 Window Type:  Single Pane  Double Pane Low-E  Double Pane/Vinyl  
U-Factor: \_\_\_\_\_ SHGC: \_\_\_\_\_ (Solar Heat Gain Coefficient)

3 # of Stories in Unit:  One or  Two  Building has multiple stories

4 Exterior Veneer/Cladding:  Siding  Brick  Stucco  Other: \_\_\_\_\_

**HVAC**

5a Heating Fuel:  Electric  Natural Gas  Other: \_\_\_\_\_

5b Is Heating Individually Metered?  Yes  No

5c Heating Type:  Electric Baseboard  Forced Air Furnace/Wall unit (80 AFUE)  Central Boiler (radiant)

**Energy Efficiencies Models**  Heat Pump  Forced Air Furnace w/ducts \_\_\_electric or \_\_\_natural gas  
Heat Pump Efficiency Rating: SEER: 15 HSPF: \_\_\_\_\_

Solar Panels Installed  (High Efficiency) Gas Furnace (90 AFUE)  
*(additional information is needed)*

5d Heating Equipment Location:  Conditioned Space  Unconditioned Space (attic/garage)

5e Air Conditioning:  Yes  No Type:  Window Unit  Central Tonnage: 2 1/2

6 Air Ducts:  Yes  No  
If Yes, Location:  Conditioned Space  Unconditioned Space (attic)

7a Water Heater:  Electric (30 gal)  Natural Gas (30 gal)  Oil

40-50 gallon  Elec Tank .90 EF  Gas Tank .58 EF  Solar Water Heating  
*(additional information is needed)*

Elec Tank .95 EF  Gas Tank .62 EF

Elec Tankless  Gas Tankless .80 EF or higher

7b Water Heater Type:  Individual units  Central Boiler

7c Water Htr Location:  Conditioned Space  Unconditioned Space (attic/garage)

8 Stove/Range:  Electric  Natural Gas

**Energy Efficiencies:**

Insulation:  Ceiling (R-20)(min.)  Ceiling (R-38)  Wall (R-13)

Ceiling (R-30)  Ceiling (R-49)  Wall (R-19)

Low Flow Water:  Shower, Faucets, Toilets **Lighting:**  100% CFL  100% LED

10  GeoThermal (HVAC and DHW) COP Rating: \_\_\_\_\_

Notes/Comments: Structure Type: Also Triplex and Fourplex

|

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Housing Agency:

Lakeland Housing Authority

### Customization & Energy Efficiency Measures for Base Ekotrope Models

Please check appropriate box(s) for each development/property and note if different for other bedroom sizes in property. NOTE: Use separate form if criteria is different for BR sizes or more than one building type per property. Blue text represents energy efficiency measures/equipment.

Development Name & No.:

John Wright Home 1 -20

Building: Year Built: 1980 Structure Type:  Apt  High-Rise  RH  SD  DH

Legend: Apt=Apartment (low-rise/mid-rise), RH=Row House/Townhouse, SD=Semi-Detached/Duplex, DH=Detached House

Resident-Paid Utilities:  Electric  Natural Gas  Water  Sewer  Trash

Agency-Paid Check-Metered Utilities:  Electric  Natural Gas  Water

OR  All Utilities are Master Metered (Paid by the Agency) (Stop here if ALL utilities are Master Metered)

Bedroom Sizes:  OBR/EFF  1BR  2BR  3BR  4BR  5BR  6BR

1 Foundation Type:  Concrete Slab  Pier-Beam (Crawl Space)  Basement

2 Window Type:  Single Pane  Double Pane Low-E  Double Pane/Vinyl  
 U-Factor: \_\_\_\_\_ SHGC: \_\_\_\_\_ (Solar Heat Gain Coefficient)

3 # of Stories in Unit:  One or  Two  Building has multiple stories

4 Exterior Veneer/Cladding:  Siding  Brick  Stucco  Other: \_\_\_\_\_

**HVAC**

5a Heating Fuel:  Electric  Natural Gas  Other: \_\_\_\_\_

5b Is Heating Individually Metered?  Yes  No

5c Heating Type:  Electric Baseboard  Forced Air Furnace/Wall unit (80 AFUE)  Central Boiler (radiant)

**Energy Efficiencies Models**  Heat Pump  Forced Air Furnace w/ducts \_\_\_electric or \_\_\_natural gas  
 Heat Pump Efficiency Rating: SEER: 15 HSPF: \_\_\_\_\_

Solar Panels Installed  (High Efficiency) Gas Furnace (90 AFUE)  
(additional information is needed)

5d Heating Equipment Location:  Conditioned Space  Unconditioned Space (attic/garage)

5e Air Conditioning:  Yes  No Type:  Window Unit  Central Tonnage: 3 tons

6 Air Ducts:  Yes  No  
 If Yes, Location:  Conditioned Space  Unconditioned Space (attic)

7a Water Heater:  Electric (30 gal)  Natural Gas (30 gal)  Oil

40-50 gallon  Elec Tank .90 EF  Gas Tank .58 EF  Solar Water Heating  
(additional information is needed)

Elec Tank .95 EF  Gas Tank .62 EF

Elec Tankless  Gas Tankless .80 EF or higher

7b Water Heater Type:  Individual units  Central Boiler

7c Water Htr Location:  Conditioned Space  Unconditioned Space (attic/garage)

8 Stove/Range:  Electric  Natural Gas

9 **Energy Efficiencies:**

**Insulation:**  Ceiling (R-20)(min.)  Ceiling (R-38)  Wall (R-13)  
 Ceiling (R-30)  Ceiling (R-49)  Wall (R-19)

**Low Flow Water:**  Shower, Faucets, Toilets **Lighting:**  100% CFL  100% LED

10  GeoThermal (HVAC and DHW) COP Rating: \_\_\_\_\_

Notes/Comments:

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# LAKELAND HOUSING AUTHORITY MTW AGENCY PLAN MEETING SIGN-IN SHEET

**Project:** MTW Agency Plan 2024

**Meeting Date:** 07/31/2023

**Facilitator:** Carlos Pizarro

**Place/Room:** LHA Conference Room

Name	Title	Site	Phone	Signature	E-Mail
Sendia Garcia	HCV man	Central of.	352 457-4419		sgarcia@lakelandhousing.org
Sheba Parker	HCV Case Mgr. specialist	Central	863-684-2911 ext. 1040 863-689-2911		sparker@lakelandhousing.org
Alexis Hurt	HCV Housing specialist	central	1007		ehurt@lakelandhousing.org
Breisha Guzman	HCV Specialist	Central	863-687-2911 ext 1006		bguzmana@lakelandhousing.org
Suzan McIntyre	FSS PC	Central	1017		smcintyre@lakelandhousing.org
Alondra Baez	Assistant Manager	Central	863-687-2911 Ext 1044		abaez@lakelandhousing.org
Cosme Guzman	HCV housing specialist	Central	(863) 687-2911 ext 1004		cguzmana@lakelandhousing.org
Emili H. Delgado	HCV Housing specialist	Central	863-279-2430		emilyultra@lakelandhousing.org
Delicia Oglesby	Writing list specialist	Central	863-689-2911 ext: 1012		Deliciao@icloud.com
MARICELY CARRETERO	inspector	Central	863-687-2911 Ext: 1005		m-carretero@lakelandhousing.org



**NOTICE OF PUBLIC MEETINGS AND PUBLIC HEARING**  
**Lakeland Housing Authority**  
**FY 2024 Agency Plan and Plan Amendment for the Moving to Work (MTW)**  
**Cohort #4: Asset Building**

The Lakeland Housing Authority (LHA) has scheduled two (2) public meetings on its FY 2024 Moving to Work (MTW) Cohort #4: Asset Building Agency Plan for the general public at 8:30 a.m. on July 31 and August 14, 2023. The meetings will be conducted inside the Lakeland Housing Authority Conference Room. You may also send your comments in writing to **430 Hartsell Avenue, Lakeland, Florida 33815, Attention: MTW.**

**The Public (Meetings) Hearings are scheduled for:**

**July 31 and August 14, 2023, at 8:30 a.m.**

LHA has developed its Moving to Work (MTW) Cohort #4: Asset Building Agency Plan in accordance with U.S. Department of Housing and Urban Development rules and regulations including, but not limited to, additional updates received from the U.S. Department of Housing and Urban Development.

The Moving to Work (MTW) Cohort #4: Asset Building Agency Plan is available for review at the above address between the hours of 8:00 a.m. and 3:00 p.m., Monday through Thursday, beginning on July 14, 2023, and ending on August 30, 2023. A copy of the Plan will be posted in the lobby of LHA and at [www.lakelandhousing.org](http://www.lakelandhousing.org) for forty-five (45) days, starting July 14, 2023. Inquiries and comments may be directed to Carlos Pizarro, Senior Vice-President of Housing, at [cpizarro@lakelandhousing.org](mailto:cpizarro@lakelandhousing.org) and/or Valerie Brown, Vice-President of Administration and Finance, 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 July 14, 2023.  
L2024 07/14; 2023-Public and Legal Notice



## **LAKELAND HOUSING AUTHORITY HARDSHIP POLICY**

### **MTW Activity Alternative Reexamination Schedule and Minimum Rent**

As a Moving to Work (MTW) agency, the LHA has approved this policy for determining when a requirement or provision of an MTW activity constitutes a financial or other hardship for the family. MTW regulations allows for the LHA to use a single hardship policy, as applicable, for multiple MTW waivers according to the Final Operations Notice Part VI: Appendix II, Hardship Policy. This hardship policy is applicable to MTW Activity for Alternative Reexamination Schedule and Minimum Rent for HCV and PH Households.

#### **LHA Policy**

The LHA will review its hardship policy(s) with residents during its intake and recertification processes. The resident must sign and submit consent forms for obtaining information requested by the LHA necessary to consider if a resident qualifies for a hardship exemption.

The LHA will determine if a resident qualifies for a hardship exemption under the following circumstances:

1. At the time of a potential termination of assistance that is due to an MTW activity
2. When a resident request a hardship exemption from a required MTW activity

The LHA will suspend the activity for the household, beginning the next month after the request, until the LHA has determined if the request is warranted. The LHA shall make a determination of whether a financial or other hardship exists within thirty (30) days after the family's request.

#### **Exemption Period**

If the LHA determines that a financial or other hardship exists, the family will receive exemption from the MTW activity as stated below. The MTW activity will resume after expiration of the exemption period.

1. 210 days for loss of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
2. 180 days for temporary reduction of benefits such as, but not limited to, Social Security (SS), SS Disability, SSI, Workman's Compensation, and other income as determined in 24 CFR 5.609(b) and (c) (4)(7)(8).
3. 150 days for loss of income due to death by head, spouse, or co-head
4. 120 days for loss or reduction of employment or earnings for any reason
5. 90 days for increased expenses
6. 60 days for break in employment, new employment, or approval of benefit income
7. 30 days for all other circumstances

If the family fails to meet the hardship standard, the LHA will resume the MTW activity and collect any retroactive rent, if applicable, through a reasonable repayment agreement.

### **Hardship Standard**

The LHA will determine what constitutes financial hardship. A family may request hardship for the following circumstances. The family must experience a decrease in income because of changed circumstances:

1. Loss or reduction of employment
2. Loss of income due to death of the head, spouse, or co-head
3. Reduction in or loss of earnings or other benefit income
4. Awaiting approval for benefit income
5. The family has experienced an increase of 10% or more of the monthly gross income in expenses: medical costs, childcare, transportation, education, or housing cost.
6. Such other situations and factors as determined by the agency to be appropriate, such as eviction, termination of utilities, or wage garnishment.

### **Grievance Procedure**

A family may request for second level review of denied hardship requests. The family must submit a request must be in writing within 30 days of the LHA written notice. Hardship request may be denied for the following reasons:

1. Failure to provide verification for loss or reduction of benefit income
2. Failure to provide verification for eligibility of benefit income
3. Failure to provide verification of increased expenses
4. Family is not subject to eviction, utility shut off, or wage garnishment
5. Failure to submit verification for decrease or loss of employment
8. Failure to provide supporting documentation related to loss of income due to death by head, spouse, or co-head