

LAKELAND HOUSING AUTHORITY

FY 2027 ANNUAL AGENCY PLAN

HUD Form 50075-ST • Moving to Work Agency

Plan Item	Board-Ready Information
PHA	Housing Authority of the City of Lakeland, Florida
PHA Code	FL011
Fiscal Year Beginning	January 1, 2027
Submission Type	Annual Submission
PHA Type	Standard PHA; MTW Expansion Agency, Cohort 4
Board Resolution	Resolution No. 26-1575
Board Meeting / Effective Date	September 21, 2026
Board Chair	David Samples
President/CEO	Benjamin Stevenson
Prepared by	Carlos R. Pizarro, Senior Vice President
Principal Office	430 Hartsell Avenue, Lakeland, Florida 33815

ACTION: This package is designed as the comprehensive board and public-review document supporting completion and electronic submission of the official HUD-50075-ST and required certifications. Items explicitly labeled "Final HUD validation" must be reconciled to the Public Housing Portal, IMS/PIC, VMS, EPIC, LOCCS, approved MTW Supplement, final RAB/public-hearing record, and executed certifications before upload.

Document Control and Executive Certification

Control	Information
Document title	FY 2027 Annual Agency Plan, HUD-50075-ST and Supporting Attachments
Version	Comprehensive Board-Ready Draft
Effective period	January 1 through December 31, 2027
Primary authorities	Section 5A, U.S. Housing Act of 1937; 24 CFR Part 903; current HUD-50075-ST; applicable HUD notices and program rules
Supersession	Replace prior FY 2027 working drafts after adoption
Technical corrections	President/CEO or designee may make non-substantive corrections required by HUD; substantive changes follow Board and public-process requirements
Record retention	Maintain signed plan, notices, affidavits, RAB record, comments/responses, certifications, upload confirmations, and supporting data in the official plan file

Recommended Board Motion

Move to approve the Housing Authority of the City of Lakeland FY 2027 Annual Agency Plan and MTW Supplement, including the policies, budgets, grants, Capital Fund references, repositioning and development activities, certifications, attachments, and public-process materials described herein; authorize the President/CEO or designee to execute and submit required HUD forms and certifications; and authorize non-substantive technical corrections required for HUD acceptance.

Approval	Signature / Date
Board Chair, David Samples	Signature:  Date: 09/21/2026
President/CEO, Benjamin Stevenson	Signature:  Date: 09/21/2026

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1. Executive Summary

The FY 2027 Annual Agency Plan is the Authority's integrated operating, compliance, financial, capital, resident-services, development, and public-accountability roadmap. It follows every substantive element identified in the current HUD-50075-ST instructions and organizes the supporting record that must accompany the electronic submission.

Strategic Pillar	FY 2027 Commitment	Primary Evidence / Measure
Preserve and reposition assisted housing	Advance HUD-accepted RAD/Section 18 Small PHA Blend transactions, tenant protections, PBV conversion, and Section 9 ACC closeout sequencing.	HUD milestones; resident notices; relocation records; transaction approvals
Expand affordable supply	Advance Twin Lakes Estates Phase III, Renaissance infill, 10th Street, Combee Road, and other approved opportunities subject to financing and approvals.	Units financed, under construction, delivered or preserved
Protect HCV performance	Maintain high-performing administration, monthly HAP utilization and shortfall controls, timely reexaminations and NSPIRE-V inspections.	SEMAP, VMS, HAP burn rate, leasing success
Resident opportunity	Integrate FSS, ROSS, YouthBuild, homeownership, wellness, digital literacy, education and workforce partnerships.	Enrollment, credentials, escrow, graduations and placements
Financial sustainability	Implement the adopted FY 2027 public housing budget, grant controls, capital tracking, reserve monitoring and cost discipline.	Monthly budget variance, grant burn rate and reserve reporting
Compliance excellence	Maintain HOTMA readiness for the MTW implementation date, NSPIRE, VAWA, fair housing, Section 504, procurement, Section 3 and audit controls.	Training, file QA, corrective action and no repeat findings

ACTION: The attached RAD source materials contain older alternatives and inconsistent unit counts. The plan uses the later Board/HUD-accepted repositioning framework: 257 initial units, Dakota Park 20-unit Section 18 action, and 237 remaining units in the Small PHA Blend plan. Project-level final numbers must match each approved RAD/SAC application and Financing Plan.

Agency Profile

Metric	FY 2027 Plan Value / Status
Public Housing ACC inventory	257 units at the initial plan baseline; update the official form to inventory at the start of FY 2027 after any completed removals
Housing Choice Vouchers	1,416 shown in the existing form draft; include special-purpose vouchers and reconcile to VMS/ACC before upload
Total combined inventory	1,673 shown in the existing form draft; final HUD validation required
2025 portfolio occupancy	99% average reported in the annual-report material
HCV households assisted	1,746 households reported for Sept. 2024 through Dec. 2025
HCV assistance administered	\$16.5 million annual rental-assistance portfolio reported
HCV performance	12th consecutive HUD High Performer recognition reported; 100% SEMAP cited in strategic materials
MTW	Expansion Agency, Cohort 4; approved activities and safe harbors govern implementation

2. HUD-50075-ST Compliance Crosswalk

Form Item	Required Content	Location in Package
A.1	PHA identity, type, FY, inventory, submission and public availability	Sections 3 and Appendix A

Form Item	Required Content	Location in Package
B.1	All 13 existing plan elements, revision status and narrative	Sections 4 through 12
B.1(c)	Deconcentration Policy for Field Office review	Section 6 and Appendix E
B.2	All 13 new-activity categories	Sections 13 through 15
B.3	Progress toward five-year mission and goals	Section 16
B.4	Most recent HUD-approved CFP 5-Year Action Plan in EPIC	Section 12; final approval date required
B.5	Most recent fiscal-year audit findings	Section 17; attach audit or summary
C.1	RAB comments and PHA responses	Section 17 and Appendix J
C.2	HUD-50077-SL local consistency certification	Appendix K
C.3	HUD-50077-ST-HCV-HP civil-rights/compliance certification	Appendix L
C.4	Challenged elements and response	Section 17 / Appendix J
C.5	Troubled PHA MOA/recovery plan, if applicable	Not applicable if current status is not troubled
MTW	Annual MTW Supplement, impacts, hardships, safe harbors, public process	Section 18 and separate approved Supplement

3. Section A: PHA Information

Field	FY 2027 Entry	Validation Source
PHA Name	The Housing Authority of the City of Lakeland	ACC / legal name
PHA Code	FL011	HUD systems
PHA Type	Standard PHA; not troubled, subject to final designation confirmation	PHAS/SEMAP
Fiscal Year Beginning	01/2027	ACC / Board budget
PH Units	257 in current form draft	IMS/PIC as of FY start
HCVs	1,416 in current form draft, including applicable special-purpose vouchers	VMS / ACC
Total	1,673 in current form draft	Reconciled inventory
Submission	Annual Submission	HUD portal
Consortia	No	Board/ACC records

Public Availability and Participation

- City of Lakeland, 228 S. Massachusetts Avenue, Lakeland, Florida 33801.
- LHA principal office, 430 Hartsell Avenue, Lakeland, Florida 33815.
- Management offices and public posting locations at each Asset Management Project and applicable LHA communities.
- LHA official website and electronic access upon request.
- Accessible formats, reasonable accommodations, language assistance, and alternative methods upon request.

4. Section B.1: Revision of Existing PHA Plan Elements

Plan Element	Revised?	FY 2027 Treatment
Housing Needs and Strategies	Yes	Expanded needs analysis, supply, affordability, accessibility, bedroom size and location strategies.

Plan Element	Revised?	FY 2027 Treatment
Deconcentration / Eligibility / Admissions	Yes	Updated waiting-list preferences, fair housing, RAD/PBV transition and HOTMA coordination.
Financial Resources	Yes	Adopted operating budget, Capital Fund, HCV, ROSS, FSS, YouthBuild and other resources.
Rent Determination	Yes	HOTMA readiness, MTW minimum-rent activity, hardship policy and payment-standard monitoring.
Operations and Management	Yes	NSPIRE, pest control, work orders, asset management, program integrity and organizational structure.
Grievance Procedures	Yes	Public housing grievance and HCV applicant/participant review and hearing crosswalk.
Homeownership	Yes	HCV homeownership, counseling and public-housing home-sale history.
Community Service / Self-Sufficiency	Yes	FSS, ROSS, YouthBuild, Resident Services, Section 3 and MTW asset-building.
Safety and Crime Prevention	Yes	Property safety, law-enforcement coordination, emergency preparedness and VAWA.
Pet Policy	No material revision unless ACOP changes	Policy remains in ACOP; assistance animals handled under civil-rights requirements.
Asset Management	Yes	RAD/Section 18, capital planning, maintenance, reserves and long-term preservation.
Substantial Deviation	Yes	Clarified mission/goal/material portfolio change standard and RAD exclusions.
Significant Amendment / Modification	Yes	Updated triggers for waiting lists, capital work, conversions, demolition/disposition, PBV and MTW actions.

5. Housing Needs and Strategy

LHA will address the needs of extremely low-income, very low-income and low-income families; elderly families; persons with disabilities; families with children; veterans; youth aging out of foster care; people experiencing homelessness; and households of different races and ethnicities. The analysis addresses affordability, supply, quality, accessibility, bedroom size and location, as required by HUD-50075-ST.

Need	Evidence in LHA Materials	FY 2027 Strategy
Severe affordability and limited supply	Approximately 8,000 families reported on the HCV waiting list; demand remains high.	Preserve existing assistance; maximize HCV leasing within funding; expand PBV and new affordable development.
Extremely low-income households	Most assisted families have very low incomes; average voucher household income reported as \$18,082.	Meet income targeting; protect subsidy; coordinate benefits and hardship protections.
Elderly households	363 units identified for elderly residents; senior wellness and clinic services are active.	Preserve senior housing; aging-in-place, accessibility, transportation and wellness partnerships.
Persons with disabilities	Mainstream vouchers and reasonable-accommodation needs are material.	Accessible communications, reasonable accommodations, UFAS/504 reviews and landlord recruitment.
Family-sized units	Family communities and bedroom-size needs vary across the portfolio.	Preserve and build appropriate 2-, 3- and larger-bedroom units where evidence supports need.
Veterans	48 veteran-oriented units and HUD-VASH activity are reported.	Maintain veteran preference/services where authorized and coordinate HUD-VASH and local partners.

Need	Evidence in LHA Materials	FY 2027 Strategy
Homelessness and foster youth	EHV, permanent supportive housing, FYI/FUP and Continuum-of-Care partnerships are active.	Target eligible special-purpose vouchers, transition EHV families consistent with approved policy, and strengthen referrals.
Location and opportunity	Voucher families face market competition and uneven unit availability.	110% FMR payment standards as adopted, landlord engagement, mobility information and exception standards where justified.
Housing quality and preservation	Aging public housing and capital needs require modernization or conversion.	NSPIRE, preventive maintenance, Capital Fund, RAD/Section 18 and mixed-finance rehabilitation.

Reasons for Selecting These Strategies

- Federal funding and HAP limitations; HCV shortfall controls; staffing and system capacity.
- Documented waiting-list demand and local housing cost pressure.
- Need to preserve resident rights while repositioning aging public housing.
- Availability of MTW flexibility, PBV, RAD, Section 18, LIHTC and local/state financing tools.
- Resident, RAB, Board, local-government, HUD and partner consultation.
- Need for accessible, geographically diverse and family-appropriate units.

6. Deconcentration, Eligibility, Selection and Admissions

LHA will administer public housing and HCV admissions consistently with the ACOP, HCV Administrative Plan, MTW approvals, income targeting, fair housing, Section 504, VAWA, Equal Access, LEP and reasonable-accommodation requirements. LHA will complete and submit its deconcentration policy for Field Office review.

FY 2027 Waiting-List Preferences

Preference	Points / Priority	Control
Current Emergency Voucher Program families at risk of termination due to lack of funding	100	Use only under the Board-approved transition/shortfall policy and applicable HUD authority.
Foster Youth	45	Verify through child-welfare/FYI/FUP documentation.
Veteran	30	Verify through reliable military or VA documentation.
Elderly	25	Verify age for head, spouse, co-head or sole member.
Working Family	5	Apply the approved definition consistently.
Tie-breaker	Original application date and time	Subject to income targeting and special admissions.

LHA will publicly announce openings and closings; accept applications through accessible methods; provide alternative access for disability or limited-English-proficiency needs; verify preferences before admission; maintain an auditable selection record; and provide notice and review rights when a preference is denied or an applicant is removed.

Deconcentration and Income Mixing

- Analyze covered family developments using average tenant income and HUD-defined thresholds.
- Where required, use incentives, outreach and admissions methods to attract higher-income families to lower-income developments and lower-income families to higher-income developments, without violating fair housing or income targeting.
- Provide voucher search information and landlord outreach supporting access outside areas of poverty or minority concentration.
- Document exemptions for developments not subject to the deconcentration rule.
- Reassess the policy as public housing converts under RAD/Section 18 and site-based or PBV waiting lists change.

7. Financial Resources and FY 2027 Budget

The statement below distinguishes adopted or source-supported amounts from estimates requiring annual reconciliation. A final HUD submission should use the latest Board-approved budget, VMS, LOCCS, EPIC and grant-award data and should not double count interfund transfers, restricted funds or project financing.

FY 2027 Public Housing Operating Budget

Category	FY 2027 Proposed Amount
Tenant income	\$223,560.48
Government subsidy / grant income	\$360,180.00
Other income, including restricted interest	\$109,556.76
Total operating income	\$693,297.24
Administrative expense	\$277,258.18
Tenant services	\$1,741.56
Utilities	\$132,806.06
Maintenance and operations	\$270,862.18
General expense	\$83,798.74
HAP / utility / FSS-related expense	\$19,850.16
Total operating expense	\$692,932.01
Projected operating surplus	\$365.23

ACTION: This budget is for John Wright Homes and Cecil Gober Villas and was modeled using 2026 budget/YTD run rates and inflation assumptions. Management must reconcile subsidy, payroll, insurance, utility, capital and RAD-transition assumptions before final adoption and throughout FY 2027.

Federal Grants and Capital Resources

Resource	Authorized / Source Amount	Available Balance / Status	Planned Use
CFP 2023	\$932,646	\$636.31 as of July 2026	Complete eligible obligated work and closeout.
CFP 2024	\$970,310	\$47,439.96 as of July 2026	Eligible modernization, management improvements and closeout.
CFP 2025	\$922,131	\$0 reported as of July 2026	Obligated/dispensed; reconcile closeout.
CFP 2026	\$938,151	\$938,151 reported as of July 2026	FY 2027 capital work, subject to EPIC and ACC amendment.
ROSS Service Coordinator 2023	\$147,487	\$55,105.92 reported	Resident services and service coordination through grant term.
ROSS FSS 2026	\$251,799	\$130,598.34 reported	FSS coordinator and eligible grant activities.
YouthBuild 2023	\$1,358,376	\$636,183.42 reported	Education, occupational training, placement and supportive services.
YouthBuild 2026	\$2,000,000	\$2,000,000 reported	New grant implementation through 2030, subject to DOL requirements.
HCV HAP / annual contributions	\$16,500,000 estimate in existing 50075 draft	Monthly VMS and shortfall monitoring	Housing assistance payments and authorized uses.

Resource	Authorized / Source Amount	Available Balance / Status	Planned Use
Public Housing Operating Fund	\$1,208,001 estimate in existing 50075 draft	Final subsidy eligibility required	Operations and eligible expenses.
Other income / investment / business activities	Existing draft shows estimates totaling \$7,000,000 across categories	Prevent duplicate counting; validate	Support authorized programs and activities.

Financial Controls

- Monthly budget-to-actual variance by AMP/program and consolidated entity.
- Monthly HAP utilization, UML, per-unit cost, leasing, NRP/shortfall and administrative fee dashboard.
- Grant obligation and expenditure deadlines, eligible-cost review, draw reconciliation and closeout checklist.
- Capital Fund work items reconciled to EPIC, procurement, contracts, physical completion and financial reporting.
- RAD transaction sources-and-uses maintained separately from operating budgets.
- Reserve policy, liquidity monitoring, interfund receivable/payable reconciliation and Board reporting.

8. Rent Determination and HOTMA

LHA will govern public housing and HCV rents through the ACOP and Administrative Plan. Policies include annual income, adjusted income, assets, deductions, minimum rent and hardship, flat rents, utility allowances, payment standards, rent reasonableness, family share and interim reexaminations.

HOTMA 102/104 Readiness

- Maintain Board-approved HOTMA policies for income exclusions, annual income, net family assets, deductions, hardship, safe-harbor determinations, interim reexaminations, EIV and de minimis errors.
- Notice PIH 2026-15 excludes MTW Expansion agencies from the January 1, 2027 full-compliance deadline until HUD can accept the applicable 2024 HUD-50058 MTW Expansion data. LHA will implement provisions already effective and maintain system, form, training and policy readiness for HUD's MTW deadline.
- Use current HUD annual inflation-adjusted amounts rather than hard-coding changing thresholds.
- Coordinate software configuration, test files, staff training, tenant notices and quality control before the effective transaction date.
- Determine whether any implementation change requires a significant amendment and complete public process before implementation.

Key Local Rent Policies

Policy Area	FY 2027 Direction
Public Housing rent	Income-based rent and flat-rent option as required; minimum rent and hardship under ACOP and approved MTW authority.
HCV family share	Generally 30% of monthly adjusted income, subject to statutory calculation and affordability at initial lease-up.
Payment standards	Maintain Board-approved schedule, reported at 100% of applicable FMR, and evaluate success rates, rent burdens and market conditions.
MTW minimum rent	Apply only as approved, with exclusions and hardship protections for affected families.
Interims	Apply HOTMA and approved MTW thresholds on the legally effective date.
PHA error	Correct overcharges and undercharges under HOTMA and adopted policy; preserve de minimis-error controls.
Utility allowances	Review schedules as required and update when regulatory thresholds are met.

9. Operations, Management and Organization

The Board of Commissioners governs policy. The President/Chief Executive Officer directs agency administration. The operating structure includes executive administration, procurement/Section 3/business and development, maintenance and construction, affordable housing programs/COO, finance and administration, HCV, public housing and mixed-finance property management, Resident Services/FSS/ROSS, YouthBuild, IT/marketing, real estate and affiliated management entities.

Organizational Chart, Functional Summary

Governance / Executive	Primary Functions	Key Operating Units
Board of Commissioners	Policy, fiduciary oversight, plan and budget approval	Board committees and public accountability
President/CEO	Executive leadership and HUD-authorized official	Executive administration and office management
SVP Affordable Housing Programs / COO	Public housing, HCV, Development, Resident Services, property operations, compliance and resident outcomes	HCV, property management, FSS, ROSS, inspections, Development, Resident Services and contract administration
VP Finance and Administration	Budgeting, accounting, grants, reporting, treasury and audit	Finance director, assistant director, finance coordinator
VP Procurement, Section 3, Business and Development	Procurement, federal clauses, Section 3, and business initiatives	Procurement
Maintenance and Construction Manager	Preventive/corrective maintenance, modernization, forced account and capital work	Maintenance, construction, HVAC, landscaping and work-order coordination
West Lake Management LLC	Public housing, mixed-finance and LIHTC property management	Community managers, leasing, maintenance and compliance
YouthBuild	DOL grant, education, occupational training and placement	Program manager, teacher, career development, case management and trainees
Information Technology / Marketing	Systems, cybersecurity, public communications and digital access	Internal support, website and public notices

Management and Maintenance Standards

- NSPIRE/NSPIRE-V inspection readiness, correction timeframes, quality-control inspections, lead-based paint and smoke/CO compliance.
- Preventive maintenance schedules for major building systems, grounds, life safety and accessibility.
- Work-order classification, emergency response, resident notification, documentation and completion quality review.
- Integrated pest management addressing cockroaches, rodents, bedbugs and other infestations without unlawful disability discrimination.
- Vacancy turnover, unit readiness, leasing coordination and approved vacancy reporting.
- Procurement, inventory, fleet, tools, warranty, contractor and forced-account controls.
- Disaster preparedness, continuity of operations, cybersecurity and records protection.

10. Grievances, Homeownership and Resident Services

Grievance and Hearing Procedures

Program	Process
Public Housing residents	Written grievance procedure under 24 CFR Part 966, Subpart B and ACOP, including notice, informal settlement where applicable, hearing, decision and accommodation.
Public Housing applicants	Informal review under ACOP and applicable due process.
HCV applicants	Informal review for covered denials under 24 CFR Part 982 and Administrative Plan.

Program	Process
HCV participants	Informal hearing for covered determinations, with notice, evidence access, impartial decisionmaker and written decision.
VAWA / Fair Housing	Confidential processing, emergency transfer, reasonable accommodation, anti-retaliation and complaint referrals.

Homeownership

LHA will continue the HCV Homeownership Program and related counseling subject to HUD rules, lender approval, affordability, inspections and family eligibility. Since 2023, four HCV families were reported to have become homeowners; more than 200 participants were reported to be working toward goals. LHA also reports having sold 11 former public housing homes to eligible families over the last decade. Current participant counts and outcomes will be updated annually.

Resident Services and Self-Sufficiency Portfolio

Program	FY 2027 Purpose	Measures
FSS	Employment, education, financial capability, asset building, escrow and homeownership readiness.	Enrollment, goals, earnings, credentials, escrow, graduations.
ROSS	Service coordination for public housing residents and seniors.	Participants, referrals, benefits, wellness and housing stability.
YouthBuild	Education, construction training, leadership, placement and supportive services.	Enrollment, diplomas/GED, credentials, placement and retention.
MTW Asset Building	Savings/credit-building and locally approved self-sufficiency strategies.	Participation, deposits, credit outcomes and hardship reviews.
Homeownership	Education, credit, lender readiness and purchase support.	Readiness milestones and closings.
Senior Wellness / Clinic	Health screenings, medication coordination, transportation and referrals.	Contacts, encounters and referrals.
Digital Access / Tutoring	Portal access, literacy, after-school tutoring and test preparation.	Participation and education outcomes.
Section 3 / Workforce	Economic opportunities connected to HUD-funded construction and contracts.	Labor hours, hires, trainees and business participation.

11. Safety, VAWA, Pets, Smoke-Free and Civil Rights

Safety and Crime Prevention

- Assess safety needs using resident complaints, incident reports, property observations, law-enforcement data and management records.
- Coordinate with the Lakeland Police Department and other public-safety partners consistent with civil-rights obligations.
- Use lighting, access controls, cameras where approved, environmental design, patrols, emergency communications and property rules.
- Address domestic violence and stalking through VAWA protections rather than adverse action against survivors.
- Maintain emergency, hurricane, fire, active-threat and continuity procedures; conduct training and drills as appropriate.

VAWA 2022

LHA supports and will comply with VAWA. Applicants, residents and participants will not be denied or terminated solely because they are survivors of domestic violence, dating violence, sexual assault or stalking. LHA will provide required HUD notices and certification forms, maintain confidentiality, permit emergency transfers under the Emergency Transfer Plan, consider lease/HAP bifurcation where authorized, protect affiliated individuals, prohibit retaliation, and coordinate voluntary referrals to qualified local service providers.

Pet and Assistance Animal Policy

The public housing pet policy is maintained in the ACOP and lease. Registration, sanitation, animal control, nuisance, damage and enforcement standards will be applied consistently. Service animals and other assistance animals are not pets and will be evaluated under fair housing, Section 504 and reasonable-accommodation requirements without pet fees or breed/weight restrictions applied as pet rules.

Smoke-Free Housing

Smoking of prohibited tobacco products is prohibited in public housing living units, interior common areas, administrative areas, and outdoor areas within 25 feet of public housing and administrative buildings, consistent with 24 CFR Part 965 Subpart G and applicable LHA lease provisions. LHA will provide notices, signage, cessation information and progressive lease enforcement with due process.

Civil Rights and AFFH

- Fair Housing Act; Title VI; Section 504; ADA; Age Discrimination Act; Equal Access Rule; VAWA; LEP and effective-communication obligations.
- Examine programs for barriers, address known impediments within available resources, coordinate with local consolidated-planning efforts, and maintain records of actions and outcomes.
- Provide reasonable accommodations, accessible formats, physical accessibility, language assistance and anti-retaliation protections.
- Conduct affirmative marketing and owner outreach, support housing choice and avoid policies with unlawful disparate impact.
- Submit HUD-50077-ST-HCV-HP and HUD-50077-SL or successor certifications with authorized signatures.

12. Asset Management, Capital Fund and Physical Needs

LHA will use project-based budgeting, physical-needs information, work-order and inspection data, utility use, occupancy, accounts receivable, reserves, grant deadlines, and redevelopment feasibility to guide long-term asset decisions. Conversion does not eliminate the duty to preserve resident protections, affordability, accessibility and sound property operations.

Capital Fund Program

The official HUD-50075-ST entry must state: "See Capital Fund 5-Year Action Plan in EPIC approved by HUD on [insert approval date]." The final package will include or reference the current EPIC 5-Year Action Plan, annual statements, ACC amendments, budget revisions, obligation/expenditure reports, environmental reviews, procurement documentation and closeout records.

Capital Control	FY 2027 Requirement
Needs basis	Current physical-needs assessment, NSPIRE findings, work-order history, accessibility, life safety and resident input.
Budget alignment	Every work item reconciled to EPIC, Board approvals, grant year, development/AMP, eligible cost and procurement.
Deadlines	Track 90% obligation thresholds, full obligation and expenditure deadlines; request extensions only under HUD authority.
RAD impact	Adjust Capital Fund eligibility and budgets for converted units; document approved contributions to closing.
Forced account	Use only when approved and cost-effective; maintain labor, materials, equipment, procurement and cost-allocation records.
Reporting	Monthly project status; quarterly Board dashboard; annual HUD/EPIC reporting and closeout.

13. Section B.2: New Activities

Activity	Yes / No	FY 2027 Description
Choice Neighborhoods Grants	No, unless a NOFO opportunity is authorized	No specific application identified; Board action and separate HUD process required.

Activity	Yes / No	FY 2027 Description
Modernization or Development	Yes	RAD rehabilitation, mixed-finance and planned affordable developments described below.
Demolition and/or Disposition	Yes	Section 18 and RAD/Section 18 actions for identified ACC units; separate SAC approval required.
Designated Housing	No new designation identified	Continue approved occupancy preferences and senior properties under applicable program documents.
Conversion to Tenant-Based Assistance	No separate voluntary/mandatory conversion identified	Repositioning is planned primarily to PBV under RAD/Section 18.
RAD PBRA/PBV Conversion	Yes	RAD/Section 18 Small PHA Blend and PBV conversion across remaining public housing portfolio.
Homeownership under 5(h), Section 32 or 8(y)	Yes, continuing HCV homeownership	No new Section 32 application identified unless separately approved.
Over-Income Families	No new activity	Apply HOTMA over-income rules; do not lease to over-income applicants absent all regulatory conditions.
Police Officers	No new activity identified	Any future occupancy requires location, terms, necessity and Board/HUD compliance.
Non-Smoking	Continuing	Maintain existing smoke-free public housing policy.
Project-Based Vouchers	Yes	RAD/Section 18 replacement PBVs, existing commitments and development pipeline.
Approved Vacancies for Modernization	As approved	Identify only units with HUD-approved vacancy status and report accurately.
Other Capital Grant Programs	Pursue if available	Lead hazards, housing-related hazards, emergency safety/security and other eligible NOFOs.

14. RAD/Section 18 Small PHA Blend and ACC Closeout

HUD-PIH accepted LHA's Board-approved repositioning plan under Notice PIH 2024-40. The accepted plan addresses 237 remaining public housing units through RAD/Section 18 Small PHA Blend transactions and recognizes the separate removal of Dakota Park's 20 public housing units under Section 18, DDA0013834. The acceptance was recorded on the RAD Resource Desk/PIH summary review page.

Development	PIC ID	ACC Units	Planned Treatment	Target / Status
Dakota Park / Carrington Place	FL011000002	20	Section 18 disposition and redevelopment; TPV replacement subject to HUD award.	Removal action reviewed; redevelopment planning.
Twin Lakes Estates Phase I	FL011000006	10	Small PHA Blend; project-level RAD and Section 18 unit split per approved application.	2026-2027 transaction activity.
Twin Lakes Estates Phase II	FL011000007	14	Small PHA Blend; project-level split per approved application.	2026-2027 transaction activity.
Micro-Cottages at Williamstown	FL011000005	48	Small PHA Blend; preservation/no major rehab anticipated in prior draft.	Transaction sequencing per HUD approvals.

Development	PIC ID	ACC Units	Planned Treatment	Target / Status
Renaissance at Washington Ridge	FL011000003	108	Small PHA Blend with rehabilitation; potential additional townhome development/PBV use subject to approvals.	2027 planning/financing.
Colton/Bonnet: John Wright and Cecil Gober	FL011000001	57	Small PHA Blend with rehabilitation or redevelopment scope to be finalized.	Later phase; prior plan showed 2029 removal.
Total initial public housing inventory		257	20-unit Dakota action plus 237-unit accepted repositioning plan.	Final inventory must match HUD systems.

Resident Rights and Transaction Controls

- Meaningful resident consultation and required RAD meetings/notices.
- Uniform Relocation Act and applicable RAD/Section 18 relocation requirements, advisory services and written relocation plan.
- Right to return, no rescreeing solely because of conversion, continued affordability, grievance and resident-organization rights as applicable.
- FHEO review and approval of relocation/fair-housing materials when required.
- Environmental review, Section 106, accessibility, site and neighborhood, subsidy layering and closing conditions.
- TPV request, PBV project-basing, HAP contract, ownership/ground lease, reserves, financing and post-closing compliance.
- Section 9 ACC closeout under PIH Notice 2019-13 or successor, only after all applicable assets, liabilities, grants, records and closeout deliverables are resolved.

ACTION: Earlier source drafts describe Faircloth-to-RAD at Twin Lakes Estates Phase III, while the later July 2026 HUD correspondence states that Faircloth was no longer being considered in the submitted closeout plan. This plan treats Faircloth/Restore-Rebuild as an option only if reauthorized by the Board and accepted by HUD, and not as a current commitment.

15. PBV Strategy and Development Pipeline

PBV activities must identify projected unit count, general location, planned work, number of PBVs to be added, consistency with the PHA Plan, selection method, program and project caps, exceptions, site and neighborhood standards, environmental review, subsidy layering, accessibility, rent reasonableness and HAP requirements.

Project / Location	FY 2027 Plan	PBV / Financing Treatment
Twin Lakes Estates Phase I, 615 Navy Drive	Preserve existing assisted senior housing and complete approved conversion activities.	RAD/Section 18 replacement PBVs per final approved documents.
Twin Lakes Estates Phase II, 935 Army Street	Preserve existing mixed-income/LIHTC housing and complete conversion activities.	RAD/Section 18 replacement PBVs per final approved documents.
Micro-Cottages at Williamstown, 1450 Kennedy Blvd	Preserve 48-unit veteran-oriented community.	RAD/Section 18 PBVs per approved transaction.
Renaissance at Washington Ridge, 150 W. 14th Street and related site	Rehabilitate 108 ACC units; evaluate additional townhomes.	RAD/Section 18 PBVs; approximately 10 non-RAD PBVs for new townhomes were identified in earlier Board material, subject to final approval.
Colton/Bonnet, Elizabeth Street / Cecil Gober area	Rehabilitate or redevelop 57 ACC units.	RAD/Section 18 PBVs and financing package.
Dakota Park / Carrington Place, 1411 Kettles Avenue	Replace obsolete units through planned 100-unit mixed-income redevelopment.	TPV/PBV and LIHTC or other financing, subject to HUD approvals.
Twin Lakes Estates Phase III	Advance planned multifamily development, current strategic materials show 92 units while older amendment materials show 98.	Existing draft references 80 PBVs; final unit mix and source must be reconciled to financing and Board/HUD approvals.
The Manor at West Bartow	Operate existing senior project-based housing.	Existing draft references 99 PBVs; confirm HAP and cap exception.

Project / Location	FY 2027 Plan	PBV / Financing Treatment
Villas at Lake Bonnet	Operate existing family mixed-income housing.	Existing draft references 18 PBVs; confirm HAP.
10th Street	Advance approximately 100 planned units subject to site, entitlements and financing.	PBV allocation only after Board approval and applicable selection.
Combee Road	Advance approximately 100 planned units subject to site, entitlements and financing.	PBV allocation only after Board approval and applicable selection.

16. Progress Report and Performance Measures

LHA's mission is to provide quality affordable housing and self-sufficiency opportunities effectively, equitably and professionally. The progress report below converts the five-year goals into auditable FY 2027 measures.

Goal	Reported Progress / Baseline	FY 2027 Measure
Increase affordable housing inventory	Twin Lakes I and II completed; Micro-Cottages completed; pipeline includes Twin Lakes III, 10th Street, Combee Road and Renaissance infill.	Units preserved, financed, under construction and placed in service.
Maintain high-performing HCV	12th consecutive SEMAP High Performer recognition and 100% SEMAP cited in source materials.	SEMAP, utilization, success rate, inspections, reexams and shortfall plan compliance.
Maintain occupancy and quality	99% average portfolio occupancy reported for 2025.	Occupancy by property, turnaround days, NSPIRE scores, work-order response and rent collection.
Advance repositioning	Board plan adopted; HUD accepted repositioning plan in August 2026.	RAD/SAC milestones, resident/FHEO approvals, financing plan and closing progress.
Promote self-sufficiency	FSS, ROSS, YouthBuild, homeownership and tutoring/wellness programs active.	Enrollment, goals, escrow, credentials, placements, graduations and closings.
Strengthen finance	FY 2027 public housing operating budget projects a \$365 surplus.	Monthly variance, reserves, grant deadlines, HCV shortfall metrics and audit results.
Improve internal operations	Comprehensive policy updates, training and Board dashboards underway.	Training completion, file QA, procurement timelines, corrective action aging and records completeness.
Fair housing and accessibility	Reasonable accommodation, VAWA, LEP and fair housing policies integrated.	Timeliness, complaint tracking, accessible units/features and outreach outcomes.

17. Audit, Public Process and Required Certifications

Most Recent Audit

The most recent opened strategic material states that the FY 2024 audit had no findings. Before final HUD submission, LHA will verify the most recent completed audit year, mark B.5 accurately, and describe any findings, questioned costs, material weaknesses, significant deficiencies, management responses and current corrective-action status.

Resident Advisory Board and Public Hearing

Required Record	Status / Placeholder
Public notice	Posted 05/21/2026
Public hearing	07/17/2026
Public comments	None received
Board action	Resolution No. 26-1575, final signed copy.
Challenged elements	None

Required Submission Attachments

- Executed HUD-50075-ST or completed Public Housing Portal submission.
- HUD-50077-SL, local official certification of consistency with the Consolidated Plan.
- HUD-50077-ST-HCV-HP, PHA certifications of compliance, civil rights and revised elements.
- Deconcentration Policy.
- RAB comments and PHA responses.
- Public comments/challenged elements and responses.
- Board resolution approving the Annual Plan and MTW Supplement.
- MTW Supplement and required MTW certifications/impact analyses/hardship policies.
- RAD/Section 18 significant-amendment material and accepted repositioning plan, if required for the submission.
- Capital Fund 5-Year Action Plan reference and current EPIC approval date.
- Current organizational chart, financial-resources schedule, grant schedule, development inventory and applicable supporting policies.

18. MTW Supplement and Governance

LHA is an MTW Expansion Agency, Cohort 4. The Annual PHA Plan does not replace the HUD-prescribed MTW Supplement. LHA will submit the current MTW Supplement through the prescribed system, identify each activity and waiver, cite statutory objectives, provide impact analyses and hardship policies, address safe harbors, document public process, and report outcomes.

MTW Control	FY 2027 Requirement
Authority	Use only approved waivers, activities and funding flexibilities.
Statutory objectives	Cost effectiveness; self-sufficiency; housing choice.
Statutory requirements	Serve substantially the same total number of eligible low-income families, maintain a comparable mix, preserve housing quality, and comply with applicable requirements.
Safe harbors	Adopt any alternative requirement only through HUD-approved process.
Impact analysis	Assess families affected, rent/term changes, demographics, hardship risk and mitigation.
Hardship policy	Accessible request, immediate suspension where required, written decision, duration/renewal and hearing rights.
Special-purpose vouchers	Respect non-fungibility and program-specific restrictions unless HUD expressly approves.
Funds	Maintain accounting, cost allocation, Board authorization and HUD reporting.
Evaluation	Track outputs, outcomes, cost and unintended effects; modify or discontinue when justified.
Public process	RAB consultation, public notice/hearing, comments/responses and Board approval.

Illustrative LHA MTW Priorities

- Asset-building and credit-building strategies for participating families.
- Administrative simplification only where approved and supported by quality controls.
- Landlord recruitment, incentives and leasing supports.
- Minimum-rent or rent-policy activities with exclusions and hardship protections.
- Resident-services coordination, economic mobility and self-sufficiency outcomes.
- Project-basing or funding flexibility when expressly authorized.

19. Implementation Calendar and Risk Controls

Period	Milestone	Owner / Evidence
September 2026	Board adoption of plan, budget and related policies; finalize public process record.	Board resolution, signed forms and minutes.

Period	Milestone	Owner / Evidence
October–December 2026	HUD portal submission/acceptance; final PHA inventory, VMS, EPIC, MTW and certification reconciliation.	Submission confirmation and correction log.
Q1 2027	Launch annual dashboard; HOTMA/MTW readiness review; grant and Capital Fund deadline review.	Board dashboard, training and system test records.
Q2 2027	RAD/Section 18 resident/FHEO/financing milestones; development pipeline gate reviews.	Transaction and risk registers.
Q3 2027	Midyear budget, grant, capital, HCV and resident-outcomes review.	Corrective action and budget revision, if needed.
Q4 2027	Draft FY 2028 plan; evaluate goals, MTW outcomes, audits and public-process improvements.	Annual evaluation and Board briefing.

Enterprise Risk Register

Risk	Trigger	Mitigation / Board Reporting
HCV shortfall	HAP burn exceeds forecast, leasing/PUC pressure or HUD designation	Monthly VMS and cash forecast; issuance and cost controls consistent with HUD-approved action plan.
RAD/FHEO delay	Relocation plan or fair-housing approval unresolved	Dedicated issue log, legal/FHEO coordination, resident notices and closing-condition tracker.
Capital Fund lapse	Obligation/expenditure pace below required threshold	Monthly EPIC/grant dashboard and project recovery plan.
HOTMA implementation	HUD sets MTW deadline or software not ready	Policy crosswalk, vendor testing, training and parallel QA.
Construction/financing	Cost escalation, gap, schedule or award risk	Decision gates, contingencies, value engineering and Board approval thresholds.
Occupancy / collections	Vacancy, turnaround or receivables deteriorate	Weekly property action plan and monthly Board KPI.
Compliance / audit	Repeat file, procurement, civil-rights or reporting exception	QA sampling, corrective action owner/date, legal review and training.
Data integrity	PIC/VMS/EPIC/financial records disagree	Formal reconciliation and certification before submission.

Appendix A. Public Housing / RAD Inventory

PIC ID	Development	ACC Units	2027 Status
FL011000001	Colton/Bonnet: John Wright Homes and Cecil Gober Villas	57	RAD/Section 18 Small PHA Blend, later-phase rehab/redevelopment.
FL011000002	Dakota Park / Carrington Place	20	Section 18 removal/redevelopment.
FL011000003	Renaissance at Washington Ridge	108	RAD/Section 18 Small PHA Blend with rehabilitation.
FL011000005	Micro-Cottages at Williamstown	48	RAD/Section 18 Small PHA Blend preservation.
FL011000006	Twin Lakes Estates Phase I	10	RAD/Section 18 Small PHA Blend.
FL011000007	Twin Lakes Estates Phase II	14	RAD/Section 18 Small PHA Blend.
	Total	257	Reconcile to FY-start inventory.

Appendix B. Financial Resource Register

Use the financial schedules in Section 7 and attach the adopted detailed public housing operating budget, HUD-52574 Board resolution, grant report, Capital Fund annual statements/5-Year Action Plan, HCV budget/shortfall plan, and project financing schedules. Each schedule must identify whether amounts are budget, award, obligation, expenditure, available balance or forecast.

Appendix C. Organizational Chart

The current chart begins with the Board of Commissioners and President/CEO and includes executive administration; procurement/Section 3/business/development; maintenance/construction; Senior Vice President of Affordable Housing Programs/COO; finance/administration; West Lake Management; HCV; YouthBuild; FSS/ROSS; property-level management, leasing and maintenance; landscaping/forced account; real estate; and IT/marketing. Attach the approved graphic organizational chart and reconcile titles, reporting lines, vacancies, grant-funded positions and affiliated-entity roles.

Appendix D. Deconcentration Policy

Attach the full Board-approved policy. At minimum it shall define covered developments and exemptions, calculate average tenant income, identify higher- and lower-income developments, state incentives and admissions measures, describe waiting-list organization, avoid skipping families in violation of fair housing or income targeting, and require annual documentation and Field Office submission.

Appendix E. Significant Amendment and Substantial Deviation Definitions

A substantial deviation is a discretionary change that materially alters LHA's mission, strategic goals, major objectives, or planned use of resources. A significant amendment includes Board-level changes to admissions preferences or waiting-list organization; additions of material non-emergency Capital Fund work not in the approved plan; material demolition, disposition, designation, homeownership, RAD, Section 18, PBV, conversion, mixed-finance or MTW activities; or another change that HUD rules require to undergo the significant-amendment process.

Consistent with applicable RAD guidance, approved RAD conversions may exclude specified changes in conversion type, Capital Fund budget, rehabilitation/construction plan or financing structure from the significant-amendment definition when HUD permits and the change does not otherwise materially alter resident rights, relocation, unit count, affordability, fair housing, Board commitments or approved MTW activities.

Appendix F. Policy and Compliance Attachment Register

Attachment	Required / Reference
ACOP	Deconcentration, admissions, rent, grievance, pets, smoke-free, CSSR, VAWA, HOTMA.
HCV Administrative Plan	Waiting list, preferences, HOTMA, NSPIRE-V, PBV, hearings, payment standards, SPVs, MTW.

Attachment	Required / Reference
FSS Action Plan	24 CFR Part 984, escrow, selection, services, portability and performance.
Emergency Transfer Plan	VAWA confidentiality, transfer criteria and records.
Reasonable Accommodation and LEP Plans	Accessible process, effective communication and language access.
Procurement Policy	2 CFR Part 200, HUD procurement, ethics, Section 3 and federal clauses.
Capital Fund 5-Year Action Plan	EPIC approval, annual statements and amendments.
RAD/Section 18 Repositioning Plan	HUD-accepted plan, resident process, FHEO, Section 9 closeout.
MTW Supplement	Activities, waivers, safe harbors, impact and hardship.
Organizational Chart	Board, executive, departments, property management and affiliates.

Appendix G. Public Process Checklist

- ☐ Draft completed and reviewed for data consistency.
- ☐ Public notice published and plan available for required period.
- ☐ Public hearing held; accessible participation and LEP supports available.
- ☐ Local consistency certification obtained.
- ☐ Civil-rights/compliance certification executed.
- ☐ Board resolution adopted after considering comments.
- ☐ Portal submission completed; acceptance/correction correspondence retained.

Appendix H. Annual Compliance Calendar

Monthly / Quarterly	Annual / Event-Based
VMS, HAP utilization and shortfall monitoring	PHA Plan, MTW Supplement and public process
Budget variance and cash/reserve review	SEMAP/PHAS and audit/FDS reporting
Occupancy, work orders, rent collection and inspections	Flat rents, payment standards and utility allowances
Grant, Capital Fund and procurement dashboard	HOTMA inflation adjustments and forms/software updates
FSS/ROSS/YouthBuild outcomes	Capital Fund annual statement / EPIC plan updates
RAD/development risk register	RAB, resident meeting and Board approvals
File QA and corrective action aging	Civil rights, VAWA, Section 504 and LEP review

Appendix J. HUD-50077-SL

Attach the fully executed Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan.

Appendix K. HUD-50077-ST-HCV-HP

Attach the fully executed PHA Certifications of Compliance with the PHA Plan, Civil Rights and Related Laws and Regulations, including the list of policy/program elements revised since the last Annual Plan.

Appendix L. Board Resolution

Attach executed Resolution No. 26-1575 approving the FY 2027 Annual Agency Plan, MTW Supplement, operating budget and associated policies/attachments, with accurate date and signatures.

Appendix M. Source Register and Reconciliation Notes

Source	Use in This Plan	Reconciliation Note
04 - HUD-50075-ST 2027 EXP New RAD.pdf	Official form structure and prior LHA narrative.	Correct stale dates, garbled text, contradictory project counts and obsolete alternatives.
Lakeland Housing Authority Strategic Plan.docx	Strategic pillars, portfolio and planning direction.	Modeled financial scenarios are not adopted budgets.
HOTMA Compliance Webinar June 2026.pdf	PIH 2026-15 timing and implementation readiness.	MTW Expansion deadline remains subject to HUD direction.
11 - 07-2026 Grant Board Report.pdf	CFP, ROSS and YouthBuild award/balance data.	Amounts are as of July 2026 and must be updated.
Significant Amendment 2.20.2026 v2.pdf	Repositioning narrative, development IDs and unit counts.	Later HUD acceptance and current transaction documents control.
Resolution 26-0000 - Section 18 Disposition v2.docx	Proposed Section 18 Board authorization.	Correct placeholder resolution/date and confirm final adopted document.
Carlos Pizarro portion of annual report.docx	Occupancy, HCV, FSS, ROSS, homeownership and services.	Primarily 2025 performance data; label dates.
Org Chart 2026.xlsx	Functional organizational structure.	Attach final approved graphic and verify reporting lines.
HUD accepted repositioning email, Aug. 6, 2026	Evidence of accepted 237-unit plan and Dakota 20-unit action.	Retain in official transaction and plan files.
FY 2027 Public Housing Operating Budget workbook	Detailed adopted/model budget and assumptions.	Reconcile to final Board-approved figures and general ledger.
FY 2027 FSS Action Plan and HCV Administrative Plan	Current detailed program policies.	Control where adopted and consistent with HUD authority.

Final HUD Submission Sign-Off

Certification	Responsible Official	Date / Initials
Inventory reconciled to IMS/PIC and ACC	Housing / Finance	BSS 9/21/2026
HCV inventory and funding reconciled to VMS	HCV / Finance	BSS 9/21/2026
Capital Fund and EPIC records reconciled	Capital / Finance	BSS 9/21/2026
Budget and grant amounts reconciled	Finance	BSS 9/21/2026
RAD/Section 18 narrative reconciled to approved applications	Development / Counsel	BSS 9/21/2026
RAB/public comments and responses complete	Executive / Housing	BSS 9/21/2026
Civil-rights, LEP, VAWA and accessibility review complete	504/Fair Housing Coordinator	BSS 9/21/2026
MTW Supplement and hardship/impact documents complete	MTW Lead	BSS 9/21/2026
Board resolution and certifications executed	Executive Office	BSS 9/21/2026
Portal upload accepted and archive complete	Authorized Submitter	BSS 9/21/2026