

LAKELAND HOUSING AUTHORITY

ADMISSIONS AND CONTINUED OCCUPANCY POLICY

PUBLIC HOUSING • HOTMA • NSPIRE • RAD • MOVING TO WORK

Policy Item	Board-Ready Information
Organization	Housing Authority of the City of Lakeland d/b/a Lakeland Housing Authority
Office	430 Hartsell Avenue, Lakeland, Florida 33815
Board Resolution	Resolution No. 26-1575
Board Meeting / Effective Date	September 21, 2026
Board Chairman	David Samples
Executive Director	Benjamin Stevenson
Policy Status	2026-2027 Final Comprehensive Operations Edition
Programs	Public Housing, MTW Expansion, Asset Building Cohort, FSS, ROSS, RAD-related public housing transition obligations

CONTROLLING AUTHORITY. Federal statutes, final regulations, HUD notices, the ACC, approved MTW waivers and safe harbors, court orders, state law, and Board-approved policies control over inconsistent text. Proposed rules are monitored but are not treated as final requirements.

BOARD ADOPTION AND CERTIFICATION

The Board of Commissioners adopts this Admissions and Continued Occupancy Policy under Resolution No. 26-1575, effective September 21, 2026. The Executive Director or designee is authorized to administer the policy, issue consistent procedures and forms, and make non-substantive technical corrections required by controlling authority. Substantive discretionary changes remain subject to applicable resident consultation, public notice, PHA Plan, MTW Supplement and Board processes.

Approval	Signature / Date	
Board Chairman	David Samples Signature: 	Date: 09/21/2026
Executive Director	Benjamin Stevenson Signature: 	Date: 09/21/2026

EXECUTIVE SUMMARY

This ACOP governs the full public housing lifecycle from outreach and waiting-list placement through eligibility, unit offer, leasing, rent, reexamination, inspections, transfers, grievance procedures, lease enforcement and move-out. It integrates LHA's local operating rules, HOTMA requirements, current MTW policies, NSPIRE procedures, VAWA, civil rights, resident participation and internal controls.

Operating area	Key LHA rule
Waiting list	Site-based waiting lists; annual update/purge; 10-business-day change reporting; selection by aggregate preference points and application date/time.
Preferences	VAWA survivor 45; Veteran 30; Person with disability 25; Working family 5; Elderly 5.
Income targeting	At least 40% of annual public housing admissions from the waiting list are extremely low-income, monitored throughout the fiscal year.
Occupancy	Two persons per bedroom with published minimum/maximum occupancy ranges and individualized reasonable-accommodation exceptions.
Minimum rent	\$130 MTW public housing minimum rent; elderly/disabled families exempt; written hardship and grievance protections.
Reexaminations	Annual for income-based rent; family composition/CSSR annually for flat-rent families; full income review at least every three years for flat-rent families.
Inspections	Move-in, move-out, annual/risk-based property inspections, complaint, emergency, quality-control and NSPIRE/REAC readiness.
MTW	Implement only approved waivers and safe harbors with hardship protections, impact review, public process, systems controls and reporting.

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RAD controlling authority and PHA Plan amendment

- LHA will administer a public housing RAD conversion under the current RAD Notice, Revision 4, as amended by Supplemental Notices 4B and 4C, the RAD Fair Housing, Civil Rights and Relocation Notice, the RAD Conversion Commitment, closing documents, and project-specific HUD approvals.
- Because LHA is an Expansion MTW agency, RAD transactions are processed through the RAD amendment to the PHA Plan in the same manner applicable to non-MTW PHAs unless HUD issues controlling project-specific direction. An Initial MTW Attachment A amendment is not substituted for the required RAD PHA Plan process.
- The RAD amendment and resident-engagement file will identify the project, conversion type, proposed PBV or PBRA assistance, transfer of assistance if any, rehabilitation or redevelopment scope, relocation impacts, resident protections, accessibility impacts, capital needs, financing and public comments.
- No activity may proceed merely because it appears in this ACOP. LHA must obtain each required HUD approval, environmental clearance, financing approval, relocation clearance, FHEO/accessibility review, Board action and closing authorization.

Mandatory RAD construction. Existing residents are not new applicants. A RAD conversion will not be used to require an existing resident to reapply or satisfy new-admission screening criteria as a condition of maintaining assistance or returning after temporary relocation.

Resident notice, engagement and consultation

- LHA will provide written RAD notices and conduct the resident meetings required by the current RAD Notice at the application, financing-plan, relocation and material-change stages. Notices will describe the proposed conversion, resident rights, expected work, relocation, accessibility, rent, lease, grievance, choice-mobility and contact information.
- LHA will provide meaningful access for persons with limited English proficiency and effective communication for persons with disabilities, including translated vital information, interpreters, accessible documents, alternative meeting methods and reasonable accommodations when required.
- Resident comments, questions and objections will be logged, evaluated and answered. Material changes in conversion type, transfer of assistance, relocation, unit mix, ownership/control, work scope or resident impact will be communicated and processed under the current notice.
- Resident organizations retain the right to organize. LHA and the post-conversion owner will recognize resident-organizing and resident-participation rights and provide required resident-organization funding under the applicable RAD PBV or PBRA provisions.

No displacement, continued assistance and right to return

- No resident may lose rental assistance as a result of the RAD conversion. A resident who is temporarily relocated for construction has a guaranteed right to return to an assisted unit at the converted property or, for a HUD-approved transfer of assistance, to an assisted unit at the approved receiving property.
- A resident may not be permanently displaced against the resident's will solely because of RAD. If the proposed unit configuration or development plan cannot accommodate the returning household, LHA will offer permissible alternatives, obtain resident input, and revise the plan when required to preserve the right to return.
- The right to return is not conditioned on new screening for income, credit, criminal history, landlord history, housekeeping, suitability or other criteria used for new applicants. Existing lease-compliance matters remain subject to ordinary notice, grievance, VAWA, disability and due-process protections and may not be manufactured or accelerated to defeat RAD rights.
- Any election to relinquish the right to return or accept another permanent housing option must be voluntary, informed, documented in writing, free from coercion, and executed only after the household receives a clear explanation of the available assisted-housing options and consequences.
- LHA will maintain a confidential return roster, household-size and accessibility-needs profile, temporary address and contact log, communication history, unit-matching record, offer/election form and final reoccupancy certification.

Relocation planning, notices and assistance

- Before relocation begins, LHA will complete the project-specific relocation plan, resident survey, phasing plan, relocation budget, comparable-unit analysis, accessibility analysis, moving-cost method, advisory-services plan and FHEO Accessibility and Relocation Checklist required by HUD.
- Relocation will not begin before issuance of the applicable RAD Conversion Commitment and delivery of the required written relocation notice. Residents will receive at least the notice period required by RAD, the URA and the controlling project approval, including 30-day or 90-day notice when applicable.
- Temporary relocation will be planned to minimize moves, school and employment disruption, health-care interruption, disability-service interruption, transportation burden and separation from community supports. Temporary housing must be decent, safe, sanitary, affordable and accessible as required.
- LHA or the project owner will pay reasonable and necessary moving and related expenses and will provide advisory services, packing or mobility assistance, utility transfer support, accessible transportation, reasonable accommodations and other required benefits.
- URA, section 104(d), 49 CFR part 24, 24 CFR part 42, RAD-specific alternative requirements and project funding requirements will be applied based on the project and person. The file must state which authority governs each notice, payment, appeal and eligibility determination.
- LHA will not direct a resident to move early or sign a release to facilitate construction without required notices, counseling and payment protection. A resident may voluntarily move earlier only under a documented, informed and noncoercive arrangement permitted by HUD.

RAD no-rescreening and re-occupancy standards

Topic	Required RAD treatment
Income eligibility	Do not deny continued assistance or return because an existing resident would not satisfy an income limit applicable to a new applicant. Apply post-conversion rent and recertification rules.
Criminal/suitability screening	Do not require new-applicant criminal, credit, landlord, housekeeping or suitability screening as a condition of conversion or return.
Household composition	Use the assisted household of record, approved changes, occupancy standards, accessibility needs and unit availability. Do not use a redevelopment-driven unit mix to defeat the right to return.
Lease compliance	Address actual lease violations through ordinary documented procedures, notices, grievance rights, VAWA, reasonable accommodation and judicial process where applicable.
Accessible unit	Match households needing accessibility features before assigning accessible units to households not needing them; coordinate approved reasonable accommodations and effective communication.
LIHTC layering	Reconcile tax-credit rules with RAD resident protections. Existing RAD residents are not treated as new applicants for purposes that would unlawfully defeat continued assistance or return. Escalate conflicts for legal/HUD review.

Post-conversion rent, deposits, lease and phase-in

- Following conversion, tenant rent is calculated under the applicable RAD PBV or PBRA rules. Residents ordinarily continue to pay an affordable income-based rent, subject to utility allowance, minimum rent, hardship and other applicable provisions.
- When conversion from a public housing flat rent or another circumstance causes the resident's tenant rent and utilities to increase solely because of conversion by more than the greater of 10 percent or \$25, LHA or the owner will apply the HUD-authorized three-year or five-year phase-in selected for the project and disclosed in writing at conversion.
- The selected phase-in methodology will be uniformly administered and will not be modified after conversion except as HUD expressly permits. Annual recalculations, hardship, utility allowance and interim changes are processed under the applicable Section 8 rules and RAD Notice.
- Each resident will receive the applicable Section 8 lease and RAD-required attachments. The lease may be terminated or not renewed only for good cause and in accordance with the applicable RAD, PBV/PBRA, VAWA and state-law requirements.
- A resident will not be charged a new security deposit solely because of conversion if prohibited by the applicable RAD rules. Existing public housing deposits will be transferred, credited or accounted for as required by the conversion documents and applicable law.

Procedural rights, grievance and termination

- Residents will receive the procedural rights required for the selected RAD conversion type. Notices must state the specific facts, effective date, legal/lease basis, evidence-review rights, accommodation/LEP contact, VAWA protections and deadline/method to request a grievance, informal hearing or other review.
- For RAD PBV, LHA will provide the grievance and informal-hearing protections required by the RAD Notice and 24 CFR part 983, including an opportunity for an informal hearing before eviction where the RAD requirements so provide.
- For RAD PBRA, the owner and contract administrator will provide the procedural, termination and hearing rights required by the RAD Notice, the Section 8 lease and applicable multifamily requirements.
- No resident will be evicted, terminated, pressured to move, or denied return for exercising RAD consultation, complaint, organizing, relocation, fair housing, VAWA, language-access, disability or grievance rights. Retaliation is prohibited.

Choice mobility, resident services and self-sufficiency

- After conversion, eligible residents will receive the choice-mobility rights applicable to the project's PBV or PBRA form of assistance, subject to the waiting period, voucher availability, turnover limits, exemptions and good-cause provisions in the current RAD Notice.

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- LHA will maintain a written choice-mobility request, tracking and priority process and will disclose waiting periods and any HUD-approved exemption. Requests for reasonable accommodation and VAWA emergency moves are evaluated independently of ordinary choice-mobility limits.
- Residents participating in FSS, ROSS or another eligible resident-services program will receive continuation, transition or comparable protections required by the current RAD Notice and approved project documents. Escrow, grant, service-coordinator and data responsibilities will be assigned before closing.
- Section 3, resident employment and contracting opportunities will be administered under the requirements triggered by the project's funding, work and conversion structure.

One-for-one replacement, ownership/control and long-term affordability

- LHA will preserve the number of assisted units required by the RAD statute and Notice, subject only to HUD-authorized de minimis reductions, transfer-of-assistance arrangements or other approved exceptions.
- The converted property will remain under the required long-term Section 8 assistance contract and use agreement. Ownership or control by a public or nonprofit entity will be maintained as required by RAD, subject to HUD-approved structures and creditor remedies.
- Project documents will preserve affordability, renewal, use restrictions, reserve requirements, capital-needs completion, reporting and enforcement rights. LHA will monitor post-closing compliance for the period assigned in the RAD documents.
- Disposition proceeds, replacement reserves, operating reserves, developer fees, seller take-back financing and other project sources and uses will be administered under HUD approval, governing documents, procurement and conflict-of-interest requirements.

Environmental, accessibility, VAWA and civil-rights controls

- No choice-limiting action may occur before completion of the applicable HUD environmental review and authorization. Environmental mitigation conditions will be incorporated into closing, construction and operations documents.
- LHA will complete accessibility due diligence, identify UFAS/Section 504/ADA/Fair Housing Act obligations, preserve accessible-unit distribution, correct barriers as required, and integrate approved reasonable accommodations into relocation and design.
- Relocation and return communications will be accessible and language appropriate. VAWA emergency-transfer and confidentiality protections continue during relocation and after conversion.
- Resident demographics and disability information used for relocation planning are confidential and shared only with authorized personnel who need the information to provide a benefit, accommodation, communication aid or safe unit match.

RAD compliance file and internal approvals

File component	Minimum documentation
PHA Plan / public process	RAD amendment, public notice, hearing, RAB consultation, comments/responses, Board action and HUD approval
Resident engagement	Notices, meeting materials, attendance, accessibility/LEP services, questions, responses and material-change notices
Relocation	Resident survey, confidential roster, notices, advisory log, offers, payments, accommodations, temporary housing, right-to-return and reoccupancy records
Civil rights / FHEO	Accessibility and Relocation Checklist, site/accessibility analysis, fair-housing review, reasonable-accommodation and language-access records
Conversion	CHAP, concept-call record, financing plan, RAD Conversion Commitment, environmental clearance, closing checklist and executed documents
Post-closing	HAP contract, use agreement, resident leases, rent phase-in, choice-mobility tracking, resident services, reserves, capital completion and reporting
Quality control	Legal/compliance review, executive certification, open-issue register, due dates and validation of

corrective action

- 27. Program Integrity, Investigations and Fraud Response
- 28. Debts, Repayment Agreements and Collections
- 29. Records, Privacy, Cybersecurity and Retention
- 30. Grievance, Due Process, Termination and Eviction
- 31. Performance Management, Training and Regulatory Change
- Appendix A. Local Preference Verification Matrix
- Appendix B. Occupancy Standards
- Appendix C. HOTMA and MTW Policy Matrix
- Appendix D. Operating Calendar and Required Forms
- Appendix E. RAD Resident Protection and Relocation Matrix

1. Governance, Legal Authority and MTW Administration

LHA operates public housing under the United States Housing Act, the ACC, 24 CFR parts 5, 8, 35, 75, 902, 903, 960, 964, 965, 966, 970, 972 and 984, the approved PHA Plan and MTW documents.

Document control and delegation

- Maintain a signed master, revision log, source register, implementation calendar, controlled forms and staff acknowledgments.
- The Executive Director may delegate functions in writing; delegations identify scope, limitations, review level and effective date.
- Mandatory changes may be issued through a technical bulletin. Discretionary changes receive legal, resident-consultation, public-process, Board and HUD review as applicable.

MTW implementation gate

- LHA was selected as an MTW Expansion agency through the Asset Building Cohort. An activity may operate only after inclusion in an approved MTW Supplement and approval of any required safe-harbor or agency-specific waiver.
- Each activity file must contain authority, population, exclusions, impact analysis, hardship policy, statutory objective, public process, training, forms, system testing, financial controls, metrics and discontinuation criteria.
- Non-waivable civil rights, VAWA, environmental, labor, procurement, audit and other federal requirements remain applicable.

2. Civil Rights, Accessibility, Reasonable Accommodation and LEP

LHA administers application, selection, leasing, rent, services, maintenance, transfers, grievances and termination without unlawful discrimination.

Accommodation workflow

- Accept oral or written requests without requiring special terminology. Date-stamp, acknowledge, identify the requested policy or physical change, seek only necessary verification when need is not obvious, analyze alternatives and issue a written decision.
- Urgent requests affecting homelessness, unit accessibility, imminent action or safety receive priority. Denials explain the basis, alternatives considered and grievance/complaint rights.

Effective communication and LEP

- Provide interpreters, auxiliary aids, accessible documents, large print, electronic accessibility, ASL or other effective communication when required.
- Maintain a four-factor LEP analysis, vital-document list and language-assistance log. Do not use minor children as interpreters except during a genuine emergency.

3. VAWA, Emergency Transfers and Confidentiality

LHA protects applicants, tenants and affiliated individuals affected by domestic violence, dating violence, sexual assault or stalking.

Notice and documentation

- Provide HUD-5380 and HUD-5382 at admission, denial and termination/eviction stages as required. Written requests generally allow 14 business days; conflicting evidence may trigger the permitted 30-calendar-day third-party documentation period.
- Accept self-certification or other permissible documentation. Do not demand third-party evidence unless permitted by VAWA.

Emergency transfer

- Accept HUD-5383 or an equivalent request; determine eligibility, imminent harm or qualifying sexual assault, confidentiality requirements, internal unit availability, external referral needs and reasonable accommodation.
- VAWA transfers rank behind immediate physical-hazard emergencies but ahead of ordinary admissions and nonemergency transfers. Keep addresses and communications restricted.

4. Outreach, Resident Relations and Application Access

Outreach is designed to reach eligible families, populations least likely to apply and residents needing accessible application methods.

Operational outreach

- Use the LHA website, social media, newspapers, minority media, public agencies, schools, faith-based organizations, disability organizations, veterans groups, shelters and community partners.
- Opening notices state program, developments or unit sizes, opening/closing times, methods, preferences, selection process, income limits, accessibility/LEP contacts and equal housing information.
- Ask applicants how they learned of the opening and evaluate response by source and underserved group.

5. Site-Based Waiting Lists and Preference Point System

LHA uses site-based waiting lists and selects applicants using verified aggregate preference points, date/time, income targeting, deconcentration and unit suitability.

Opening, closing and organization

- Publicize the opening and closing through equivalent methods. LHA may open all or selected site/bedroom lists and may close when the list is sufficient for expected needs.
- The database records head, household, bedroom need, date/time, claimed preferences, accessibility need, income-targeting category and site choices. Public housing and voucher lists remain separate.

Updates and removal

- Update and purge at least annually. Applicants must report contact, income, household, preference and site-choice changes within 10 business days.
- Provide 10 days to respond to an update; if returned with a forwarding address, resend and allow 10 business days. Apply reasonable accommodation and VAWA exceptions before removal.
- Removal notices explain the reason and review rights. LHA does not maintain an interest list while closed.

Preference point schedule

Preference	Points	Operational verification
VAWA survivor	45	HUD-5382, permitted third-party record, law-enforcement/court record, or other accepted evidence; preserve confidentiality
Veteran	30	DD-214, military service record, VA or other reliable proof
Person with disability	25	Verification of disability status without unnecessary medical detail
Working family	5	Employment, offer of employment, full-time education or job-training verification under adopted definition
Elderly	5	Proof that qualifying head, spouse, co-head or sole member is at least 62
Tie breaker	N/A	Earliest original application date and time

Selection

- Rank by total verified points. Resolve equal points by earliest application date/time. Applicants without a preference follow preference applicants by date/time, subject to targeting, deconcentration, accessible-unit and designated-housing rules.
- Preference is claimed at application and verified before unit offer. If denied, provide a written basis and 10-business-day review request period.

6. Applications, Eligibility Interviews and File Completion

Applications move from preapplication to full eligibility review through documented and accessible workflows.

Application procedures

- Accept applications only while the applicable list is open, online and in person as announced, with mail, telephone or another accommodation where needed. Date/time stamp complete submissions.
- When selected, send the full packet and at least 10 calendar days' appointment notice. Require the head and adults 18 or older to attend unless an accommodation or alternative method is approved.
- After two missed appointments without good cause, place the application inactive/remove after written notice and review rights.

File checklist

- Application and household declarations
- Citizenship/eligible status and SSN documents
- Income, assets and deductions
- Preference verification
- Criminal, sex-offender, prior tenancy and debt screening
- Reasonable accommodation/VAWA documentation in restricted files
- Eligibility calculation, supervisor review and written decision

7. Eligibility: Family, Household, Income, Citizenship, SSNs and Assets

Admission requires an eligible family, income within the applicable limit, eligible status under Section 214, SSN compliance, satisfaction of asset restrictions when effective and successful screening.

Family and household

- Family includes permitted single persons and groups. Household includes live-in aides, foster adults and foster children, who affect unit size but are excluded from family income/assets as required.
- Approve a live-in aide only when essential to care, not obligated for support and would not otherwise reside. Screen the named aide and verify need if not obvious.

Citizenship, SSN and assets

- Obtain declarations and SAVE verification for eligible noncitizens; prorate mixed-family assistance under current final rules.
- Obtain SSNs or applicable certifications and resolve identity mismatches. A child under six added near admission may receive the authorized 90-day period and one qualifying extension.
- At admission, enforce the current HUD-published net-asset limitation and suitable-real-property test, including statutory exceptions. LHA does not enforce the asset limitation at reexamination under its present discretionary policy.

8. Screening, Criminal History and Denial of Admission

Screening is individualized, evidence-based and connected to tenancy obligations.

Mandatory and local standards

- Mandatory denials include lifetime sex-offender registration, methamphetamine production on federally assisted premises, qualifying prior drug-related eviction and current illegal drug use or alcohol abuse threatening safety.
- LHA's reasonable lookback for other criminal activity is generally three years from the most recent conviction. A pattern is at least two drug/alcohol-related offenses within three years. Current illegal drug use is activity within 180 days of discovery under the adopted rule.
- An arrest alone is not proof. Use reliable underlying evidence and a preponderance standard. Provide the record subject and applicant an opportunity to dispute criminal information before denial.

Mitigating factors

- Consider seriousness, recency, pattern, age at conduct, rehabilitation, disability-related circumstances, VAWA, culpability, effect on nonculpable members and removal of the offending member when permitted.

9. HOTMA Income, Assets, Deductions and Hardship Policies

HOTMA policies are applied according to currently enforceable requirements and LHA's MTW implementation status.

Income and assets

- Use anticipated income at admission/interim and the required prior-year/current-income methodology at regular review. Count actual asset income and impute only when required using HUD's published passbook rate.
- Maintain an annual desk guide for inflation-adjusted asset limits, self-certification threshold, dependent deduction, elderly/disabled deduction and student/adoption exclusions.
- Accept asset self-certification at or below the current threshold when authorized and obtain full third-party verification at least every three years.

Deductions and hardship

- Apply childcare, health/medical and disability-assistance deductions under current requirements. General medical/DAE hardship uses the authorized 5% threshold for up to 90 days with one additional 90-day extension, and further case-by-case review.
- Childcare hardship may continue the deduction for 90 days with one additional 90-day extension and further case-specific review. Issue decisions within 10 calendar days and provide 30 days' notice of a rent increase.

MTW minimum rent

- Public housing minimum rent is \$130 under approved MTW authority. Elderly and disabled families are exempt. Suspend minimum rent while evaluating a written hardship request. A temporary hardship lasts less than 90 days; a long-term hardship exceeds 90 days and remains exempt while qualifying conditions continue.

10. Verification, EIV, SAVE and Quality Control

Verification follows HUD's hierarchy and protects privacy.

Hierarchy and timing

- Use EIV/UIV first for participants, followed by tenant-provided written third-party documents, direct written verification, oral verification and self-certification as authorized.
- Verification is generally current if received within 120 days unless a program-specific rule provides otherwise. Document attempts and reasons for moving down the hierarchy.
- Give families 10 business days to provide requested information. Resolve EIV identity, deceased, multiple subsidy, existing tenant, former tenant and debt reports.

Quality control

- Files include calculation worksheets, verification summary, HUD-50058/HIP evidence, notices and approvals. Supervisory review is required for overrides, retroactive adjustments, zero income, hardship, repayment, admission denial and termination.

11. Notification, Orientation and Applicant Rights

Eligible and ineligible applicants receive prompt written decisions and a structured preoccupancy orientation.

Notices and reviews

- Issue ineligibility notices within 10 working days after determination, stating facts, policy basis and the 10-calendar-day review request period. Immigration-status reviews follow specialized hearing and appeal rules.
- Eligible applicants receive an approximate occupancy projection without a guarantee.

Orientation

- Give at least 10 business days' notice. Head and all adult household members attend unless an accommodation is approved. Cover lease, rent choice, \$130 minimum rent, utilities, reporting, maintenance, emergencies, NSPIRE, housekeeping, transfers, VAWA, fair housing, CSSR, grievances and program integrity.

12. Developments, Designated Housing and Accessible Units

Unit assignment respects development type, accessibility, designated-housing approvals and applicant choice.

Development matching

- Offer accessible units first to families needing the features. A family not needing the features may occupy temporarily only with a lease requirement to transfer when needed.
- Apply elderly/disabled preferences in mixed-population developments and any HUD-approved designated-housing plan. Do not exclude families with children from nondesignated developments.

13. Occupancy Standards and Unit-Size Determinations

Occupancy standards use two persons per bedroom, with individualized exceptions.

Standards

Bedrooms	Minimum persons	Maximum persons
0	1	1
1	1	3
2	2	5
3	3	7
4	5	9
5	7	11

Exceptions

- A separate bedroom may be approved for verified age, health, disability, medical equipment, live-in aide, foster placement or other accommodation need.
- A single head is not required to share with children. Guests do not generate bedroom entitlement.
- Over-housed and under-housed families are placed on the transfer list; mandatory transfers precede voluntary requests.

14. Unit Offers, Deconcentration and Leasing

LHA offers the appropriate ready-to-rent unit to the highest-ranked eligible applicant.

Offer procedure

- Offer by telephone or preferred contact and confirm in writing. Allow three days to accept or refuse. Maintain a unit-offer log with development, unit, date, response and good-cause determination.
- Good cause includes temporary medical incapacity, unsafe or inaccessible unit, verified threat, incompatible accessibility features, or serious employment/education/disability-service disruption. Location preference alone is not good cause.
- A refusal without good cause results in removal or other consequence stated in the current adopted offer policy and notice, with applicable review rights.

Deconcentration

- Monitor average income by development and comply with deconcentration and income-mixing. Track extremely low-income admissions to ensure at least 40% of waiting-list admissions annually.

15. Use, Occupancy, Guests and Absence

The unit is the family's sole residence and only approved household members may reside there.

Guests and absence

- Guests may remain up to 14 cumulative days in a 12-month period unless an approved exception applies. Unapproved occupants, subleasing, boarders and assignment are prohibited.
- Report an entire-family absence within 10 calendar days. Absent periods over 60 consecutive days require written approval; the unit may not cease to be the primary residence.
- Report foster care, hospitalization, nursing home, military, school and caregiver changes within 10 business days. Apply VAWA and reasonable-accommodation exceptions.

16. Choice of Rent, Flat Rent and Income-Based Rent

Families choose annually between income-based and flat rent, except where an over-income policy controls.

Flat rent

- Set no lower than the applicable statutory percentage of FMR/SAFMR or approved exception, less utility allowance for tenant-paid utilities. Review within 90 days after new FMRs.
- If an updated flat rent increases the family's payment by more than 35%, apply the required phase-in. Families paying flat rent receive annual composition/CSSR review and full income review at least every three years.

Income-based rent

- TTP is the greatest applicable amount: 30% of monthly adjusted income, 10% of monthly gross income, welfare rent where applicable, or LHA's approved minimum rent. Tenant rent equals TTP less utility allowance, subject to utility reimbursement.

17. Tenant Rent, Minimum Rent, Charges and Payment Controls

Rent and charges are administered under the lease and approved schedules.

Payment rules

- Tenant rent is due by the 5th and delinquent after close of business on the 10th, adjusted for weekends/holidays. A \$25 late fee is assessed when unpaid after the adopted delinquency date.
- No cash. Accept money order, cashier's check and personal check until more than one NSF check. The NSF charge is \$35 and future payments may be restricted to guaranteed funds.
- Other charges include resident-caused damage beyond normal wear, excess utilities, approved pet deposits, court-awarded costs and scheduled charges. Provide an invoice/work order and grievance notice.

Minimum rent

- Apply the \$130 MTW public housing minimum rent to covered non-elderly, non-disabled families. Suspend during hardship review and apply temporary or long-term relief and grievance rights.

18. Security Deposits and Move-Out Accounting

Security deposits protect against unpaid amounts and resident-caused damage.

Operations

- Collect the published deposit before move-in. Current schedule is \$300 for one-, two- and three-bedroom units unless updated by Board-approved schedule and state law.
- Maintain deposit accounting; do not apply during occupancy. At move-out compare signed move-in/move-out inspections, unpaid rent and charges, keys and unit condition. Provide refund/itemization under Florida law.
- The pet deposit schedule is \$500; service/assistance animals are not pets and are not charged a pet deposit.

19. Utilities, Allowances, Surcharges and Reimbursements

Utility allowances represent reasonable consumption for an energy-conservative household.

Allowance administration

- Maintain schedules by utility, fuel, unit type and size. Review annually and revise when rate changes require, including the adopted 10% trigger.
- Provide required resident notice and comment opportunity for allowance/surcharge changes. Approve individualized relief as a reasonable accommodation.

Utility reimbursement

- Pay utility reimbursement directly to the family. When the monthly amount is \$45 or less, LHA may issue prospective quarterly payments under the adopted schedule and reconcile at move-out.

20. Dwelling Lease, House Rules and Lease Changes

The dwelling lease states all parties, approved household members, unit, term, rent, utilities, obligations, maintenance, entry, VAWA, grievance and termination provisions.

Lease administration

- Initial term is 12 months and automatically renews for the same term, except as permitted for CSSR noncompliance or other controlling rule.
- Give at least 30 days' resident/resident-organization notice and comment for lease-policy revisions when required.
- Provide lead disclosures and records for covered pre-1978 housing and retain acknowledgments.

21. Reexaminations and Interim Changes

Reexaminations determine continued eligibility, household, unit size, rent, CSSR and applicable over-income status.

Regular schedule

- Income-based families receive a full review at least every 12 months. Flat-rent families receive annual household/CSSR review and full income review at least every three years. Begin the process about 120 days before the effective date.
- Schedule between 9 a.m. and 5 p.m. on business days, require the head and adults unless an alternate method is approved, and allow one rescheduled appointment for good cause.

Interim changes

- Families report required income, deduction and household changes within 10 business days. Process required household additions/removals under PIH 2026-09 even if adjusted income does not change, subject to any valid final-three-month policy.
- Process qualifying adjusted-income decreases under the current HUD threshold and required increases under the 10% rule, considering earned-income exceptions. Complete within 30 days when practicable.
- Timely decreases are effective under HOTMA rules, including retroactive application when required. Increases receive at least 30 days' notice.

22. CSSR, FSS, ROSS and Resident Self-Sufficiency

LHA connects residents to self-sufficiency while administering CSSR fairly.

CSSR

- Nonexempt adults complete eight hours monthly or 96 hours annually of community service, self-sufficiency activity or a combination. Verify exemptions and compliance annually.
- Exemptions include elderly persons, qualifying persons with disabilities/caretakers, adults engaged in qualifying work activity, qualifying welfare-program exemptions/participation and non-public-housing over-income family members. LHA uses 30 hours per week as the work-activity standard.
- Noncompliance leads to notice and a work-out agreement; lease nonrenewal may follow failure to cure.

FSS/ROSS/Asset Building

- Coordinate FSS contracts, escrow, ITSP goals, ROSS referrals and MTW Asset Building Cohort activities. Participation remains voluntary unless an approved authority provides otherwise. Protect privacy and explain interactions with rent and benefits.

23. Zero-Income Families and Special Reviews

Zero-income review tests whether reported income is complete while avoiding assumptions.

Operations

- Schedule special review every 120 days while income cannot be reasonably projected. Use a zero-income questionnaire, EIV/IVT, expense review and adult certifications.
- Request evidence of how food, utilities, transportation and other necessities are paid. Count regular monetary or in-kind contributions unless excluded; do not assign value to excluded nonmonetary donations.
- Advise families of minimum-rent hardship and do not treat household poverty alone as fraud.

24. Public Housing Over-Income Families

HOTMA Section 103 limits continued occupancy of public housing over-income families.

Determination and notices

- Compare annual income to 2.4 times the applicable very-low-income limit. Issue initial, 12-month and 24-month notices within 30 days of each determination and track the 24-consecutive-month period.
- LHA's adopted policy is to terminate tenancy after the family remains over-income for 24 consecutive months. Current policy calls for termination 30 days after the third/final notice, subject to state law, grievance and controlling HUD requirements.
- Update over-income limits within 60 days after HUD publishes annual income limits and complete annual reporting.

25. NSPIRE Inspections, Maintenance and Life-Safety Response

Public housing inspections follow NSPIRE, REAC and LHA preventive-maintenance controls.

Inspection types and access

- Complete move-in and move-out inspections with the family when available; annual or risk-based property inspections; emergency, complaint, housekeeping, preventive maintenance and quality-control inspections.
- Give at least two days' notice for routine entry. Emergency entry may occur without advance notice. Allow one reschedule with 24-hour prior notice unless good cause warrants more.

NSPIRE response

- Inspect unit, inside and outside areas and classify deficiencies as life-threatening, severe, moderate or low. Correct life-threatening conditions within 24 hours and other deficiencies within applicable HUD timeframes.
- Although specified affirmative deficiencies are not scored until October 1, 2026, they remain citable and must be corrected. Maintain readiness for fire-labeled doors, GFCI/AFCI, guardrails, HVAC, interior lighting and minimum electrical/lighting requirements.
- If family-caused housekeeping/damage items fail, provide 10 business days to correct and reinspect. Offer voluntary housekeeping training; repeated failure may constitute lease violation after due process.

26. Transfers, RAD Conversion, Resident Protections and Relocation

Transfers are managed through a centralized list and priority hierarchy.

Priority order

- First: immediate physical-hazard emergencies. Then Category 1: VAWA, other emergencies, demolition/disposition/revitalization/rehabilitation, court order and capital work. Then Category 2: occupancy standards, reasonable accommodation and incentive transfers. Admissions follow, then Category 3 resident-initiated and split-family transfers.
- Within a category, order by date the complete verified request is received. Mandatory transfers take priority over new admissions as specified.

Relocation controls

- For RAD, Section 18, modernization or major rehabilitation, coordinate relocation plan, notices, advisory services, accessible units, moving costs, temporary housing, right to return where applicable, records and FHEO/HUD approvals.
- LHA pays reasonable transfer costs for PHA-initiated physical hazard, major program work and approved reasonable accommodation transfers.

27. Program Integrity, Investigations and Fraud Response

Program-integrity reviews distinguish error, noncompliance and intentional misrepresentation.

Investigation

- Log referrals; require independently verifiable facts; conduct file/EIV review; obtain relevant employer, agency, public-record and witness evidence; preserve confidentiality and chain of custody.
- Provide a tenant conference before serious action, disclose relied-upon evidence as required and allow 10 business days for mitigating evidence.
- Determine violation, intent, period, amount owed, corrective action and eligibility. Refer potential criminal matters to appropriate authorities and HUD OIG when warranted.

28. Debts, Repayment Agreements and Collections

Debts are calculated, noticed and collected under affordable, documented terms.

Repayment agreement

- State debt basis, period, calculation, lump sum, monthly installment, due dates, default and rights. Rent plus repayment should generally not exceed 40% of monthly adjusted income.
- Do not maintain multiple active agreements. New debt during an agreement is due within 30 days under the adopted policy. LHA does not offer an agreement for debt over \$5,000 under the current rule and may use collection/legal remedies.
- Report qualifying debt and termination information to EIV and maintain required records.

29. Records, Privacy, Cybersecurity and Retention

Records are accurate, accessible, confidential and protected.

Controls

- Use role-based access for EIV, SAVE, criminal, disability, VAWA, banking and PII. Do not place protected data in unrestricted email or shared drives.
- Retain HUD-50058 and supporting records for at least three years and longer when another authority, audit, litigation hold, grant or state schedule requires.
- Destroy criminal records after their authorized purpose and challenge/litigation period, while retaining only permitted screening metadata.
- Report privacy/cyber incidents immediately and preserve evidence.

30. Grievance, Due Process, Termination and Eviction

Residents receive due process for covered disputes.

Grievance operations

- Accept oral or written grievances at central or property offices. Conduct informal settlement and issue a written summary generally within 10 business days.
- A hearing request is due within 10 calendar days after the summary. Use an impartial hearing officer not involved in or subordinate to the original decision.
- Provide document access, representation, private hearing unless public requested, evidence presentation, confrontation and cross-examination, reasonable accommodation, LEP and an evidence-based written decision, generally within 10 business days.

Termination

- Notices state specific facts, lease/policy basis, effective date, evidence rights, grievance rights and accessibility contact. Apply VAWA, disability, mitigating circumstances and effect on nonculpable members before discretionary action. Judicial eviction follows Florida law and applicable federal notice.

31. Performance Management, Training and Regulatory Change

LHA maintains continuous quality assurance, staff capability and regulatory readiness.

Management system

- Maintain monthly vacancy, turnaround, rent collection, work order and lease-enforcement dashboards; quarterly admission, preference, targeting, transfer, reexamination and quality-control reviews; and annual utility, flat-rent, income-limit, NSPIRE and policy updates.
- Train staff on HOTMA, MTW, NSPIRE, VAWA, fair housing, EIV/SAVE, screening, grievance, cybersecurity, rent and waiting-list procedures.
- Use risk-based file sampling and corrective-action tracking with owner, due date, root cause, dollar impact and validation.

APPENDIX A. LOCAL PREFERENCE VERIFICATION MATRIX

Preference	Points	Verification / control
VAWA survivor	45	Use permitted VAWA documentation; confidential restricted file
Veteran	30	DD-214, military/VA record or reliable proof
Person with disability	25	Verify qualifying status without unnecessary diagnosis
Working family	5	Employment, employment offer, education or job training under adopted definition
Elderly	5	Age 62+ for qualifying head, spouse, co-head or sole member
Selection tie	N/A	Earliest original application date/time
Change reporting	N/A	Within 10 business days; retain original date/time

APPENDIX B. OCCUPANCY STANDARDS

Bedrooms	Minimum	Maximum
0	1	1
1	1	3
2	2	5
3	3	7
4	5	9
5	7	11

APPENDIX C. HOTMA AND MTW POLICY MATRIX

Policy	LHA operational choice
Asset limitation at reexamination	Not enforced at reexamination under current discretionary policy; enforced at admission when applicable.
Asset self-certification	Permitted at/below HUD threshold; full verification at least every 3 years.
Interim household change	Process addition/removal regardless of income effect under PIH 2026-09, subject to any valid final-3-month policy.
Public housing minimum rent	\$130 for covered non-elderly, non-disabled families; hardship required.
HOTMA full compliance timing	MTW agency implementation follows HUD's MTW system-readiness schedule; already-effective provisions remain implemented.
Asset Building Cohort	Operate only approved intervention, evaluation, hardship, privacy and reporting terms.
MTW work requirement	No work requirement is adopted in this ACOP.

APPENDIX D. OPERATING CALENDAR AND REQUIRED FORMS

Frequency	Controls
Daily	Date-stamp applications, changes, accommodation/VAWA requests, complaints, inspections and grievances.
Monthly	Vacancy/turnaround, rents, delinquencies, work orders, EIV exceptions, transfer and admissions tracking.
Quarterly	Quality-control files, MTW metrics, regulatory review, access review and corrective actions.
Annual	Waiting-list update/purge, utility schedule, flat rents, income limits, over-income limits, outreach, training and policy crosswalk.
Every 3 years	Full income review for flat-rent families; full asset verification when applicable; site-based testing/review as required.
At admission	Eligibility, preference, screening, orientation, move-in inspection, lease and deposit.
At adverse action	Fact-specific notice, evidence review, VAWA/accommodation analysis and grievance rights.

Core forms

- Preapplication and full application
- Waiting-list opening/closing, update, removal and preference decision notices
- Reasonable accommodation request/decision and LEP assistance record
- HUD-5380, HUD-5382, HUD-5383 and Emergency Transfer Plan
- Eligibility, criminal-record dispute and denial notice
- Income, asset, real-property, deduction and hardship certifications
- Orientation acknowledgment, lease, house rules and move-in/out inspection
- Reexamination, interim change, CSSR, zero-income and over-income notices
- NSPIRE inspection and corrective-action notices
- Transfer request, priority decision and relocation records
- Debt calculation, repayment agreement, grievance request and decision

APPENDIX E. RAD RESIDENT PROTECTION AND RELOCATION MATRIX

Protection	LHA control
Notice and meetings	Provide RAD notices, required meetings, accessible communication, language access and responses to comments.
No displacement	No resident loses assistance or is permanently displaced against the resident's will solely because of RAD.
Right to return	Guarantee an assisted unit at the converted or approved transfer-of-assistance property after temporary relocation.
No rescreening	No new-admission income, criminal, credit, landlord, housekeeping or suitability screening for existing residents.
Relocation assistance	Provide required notices, advisory services, temporary housing, moving payments, accommodations and URA/RAD protections.
Rent protection	Apply income-based rent and HUD-authorized phase-in when conversion causes a qualifying rent/utility increase.
Lease and good cause	Provide applicable Section 8 lease; termination/nonrenewal only for good cause and with procedural protections.
Grievance / hearing	Provide RAD PBV or PBRA procedural rights, evidence access, accommodation, language access and nonretaliation.
Choice mobility	Track and process requests under applicable RAD PBV/PBRA timing, availability, exemptions and priorities.
Resident organization	Recognize organizing rights and provide required participation funding.
FSS / ROSS	Preserve or transition eligible resident-services participation and assigned program responsibilities.
Accessibility / LEP / VAWA	Integrate accessibility, effective communication, reasonable accommodation, language access, emergency transfer and confidentiality.
One-for-one / affordability	Preserve required assisted units, public/nonprofit ownership or control, long-term HAP and use restrictions.

Required RAD forms and project exhibits

- RAD Information Notice and General Information Notice, when applicable.
- Resident meeting notices, presentation, questions and written responses.
- Project-specific relocation plan, resident survey and confidential roster.
- Right-to-return, no-rescreening and voluntary-election forms.
- URA/RAD notices, advisory-services log, moving-cost documentation and claim/appeal forms.
- Reasonable accommodation, accessibility, effective communication and language-access forms.
- Temporary-unit inspection, lease/license, payment and reoccupancy records.
- Rent phase-in disclosure and calculation, post-conversion lease and resident-rights notices.
- Choice-mobility request and tracking record.
- FHEO Accessibility and Relocation Checklist and supporting exhibits.
- Resident-services transition plan, FSS/ROSS records and Section 3 documentation when applicable.
- Post-closing compliance calendar and capital completion/reserve records.