

LAKELAND HOUSING AUTHORITY**FAMILY SELF-SUFFICIENCY
ACTION PLAN****Fiscal Year 2027***HUD Part 984 • MTW Integration • Performance Standards • Operational Appendices*

Plan Item	Information
PHA	Housing Authority of the City of Lakeland, Florida
PHA Code	FL011
Address	430 Hartsell Avenue, Lakeland, Florida 33815
Prepared for	Board of Commissioners and U.S. Department of Housing and Urban Development
Prepared by	Carlos R. Pizarro, Senior Vice President
Proposed effective date	09/21/2026
Board resolution	Resolution No. 26-1575
HUD status	Revised Action Plan; submit to HUD for approval when required by 24 CFR 984.201(c)(2)
Board Meeting Date	09/21/2026

IMPORTANT ADOPTION NOTE

This comprehensive revision replaces prior LHA FSS Action Plan drafts. Current program counts, mandatory program size, coordinator positions, grant amounts, participant demographics, and voucher totals must be validated against HUD systems, grant records, the current FSS roster, the FY 2027 Agency Plan, and Board records before submission or adoption.

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

Executive Transmittal and Board Action

To	Board of Commissioners, Lakeland Housing Authority
From	Carlos R. Pizarro, Senior Vice President
Subject	FY 2027 Comprehensive Family Self-Sufficiency Action Plan
Requested Action	Approve the revised FSS Action Plan and authorize submission to HUD, implementation, and non-substantive technical corrections required by HUD.
Board Meeting Date	09/21/2026
HUD Submission Date	9.22.24

The FY 2027 FSS Action Plan establishes LHA's policies and procedures for operating Family Self-Sufficiency programs serving eligible Public Housing and Housing Choice Voucher households. It incorporates the current structure of 24 CFR Part 984, integrates LHA's MTW and centralized Resident Services strategies, establishes escrow and case-management controls, and provides measurable performance standards and audit-ready appendices.

Recommended Board Motion

BOARD MOTION

Move to approve the Lakeland Housing Authority FY 2027 Family Self-Sufficiency Action Plan, authorize submission to HUD and implementation upon required approval, authorize the President/CEO or designee to execute required certifications and forms, and authorize staff to make non-substantive technical corrections required by HUD or necessary to maintain regulatory citations and form references.

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1. Executive Summary

The Family Self-Sufficiency Program is a voluntary employment, education, financial capability, and asset-building program that coordinates HUD housing assistance with public and private resources. LHA will operate the program through individualized coaching, a Contract of Participation, Individual Training and Services Plans, supportive services coordination, and FSS escrow accounts for eligible families.

Strategic Area	FY 2027 Direction
Economic mobility	Support employment, wage progression, education, credentials, entrepreneurship, financial capability, and asset building.
Participant choice	Use individualized goals and participant-centered coaching; do not condition housing assistance on FSS participation.
Program integration	Coordinate Public Housing, HCV/PBV, Homeownership, special-purpose vouchers, Resident Services, ROSS, MTW, and community partnerships.
Escrow integrity	Maintain accurate baseline, monthly credit, subsidiary ledger, annual statement, interim disbursement, final disbursement, and forfeiture controls.
MTW alignment	Use only HUD-approved MTW flexibilities and maintain safe harbors, impact analysis, hardship policies, nondiscrimination, and grant restrictions.
Performance management	Track enrollment, engagement, goals, employment, earnings, education, escrow, graduation, partnerships, exits, and participant experience.

2. Authority, Applicability, and Plan Approval

2.1 Governing Authorities

- Section 23 of the United States Housing Act of 1937.
- 24 CFR Part 984, including §§ 984.101 through 984.401.
- Applicable HCV, PBV, Public Housing, HCV Homeownership, and Moderate Rehabilitation rules.
- HUD FSS notices, forms, grant requirements, reporting instructions, accounting guidance, and current FSS training resources.
- LHA's Annual Agency Plan, MTW Supplement, Administrative Plan, ACOP, Resident Services Plan, adopted budgets, and Board resolutions.

2.2 HUD-Approved Action Plan

LHA must maintain a HUD-approved Action Plan before operating a mandatory or voluntary FSS program. This Action Plan is developed in consultation with the applicable local government chief executive, PCC, current and prospective participants, workforce agencies, education and training providers, child care entities, financial empowerment providers, nonprofit service providers, private businesses, and other affected service providers.

After initial HUD approval, LHA will submit revisions to HUD when it proposes policy changes, increases the size of a voluntary program, or HUD requires changes. Administrative updates that do not change policy will be documented through the revision-control process.

2.3 Nonparticipation

VOLUNTARY PARTICIPATION

Admission to Public Housing or Section 8 assistance will not be conditioned on FSS participation. Housing assistance will not be terminated because a family elects not to participate or fails to comply with FSS program requirements. Separate lease or program violations remain subject to the ACOP, Administrative Plan, lease, and applicable due process.

3. Program Purpose, Objectives, and Local Strategy

LHA's objective is to reduce dependency on welfare assistance and housing subsidies by connecting eligible families with education, job training, employment, counseling, financial capability, and other services that support economic independence and self-sufficiency.

- Increase participant access to employment and advancement opportunities.
- Support completion of high school equivalency, postsecondary education, vocational training, credentials, apprenticeships, and digital skills.
- Build financial capability through budgeting, credit, banking, debt management, tax preparation, consumer protection, savings, and homeownership readiness.
- Address transportation, child care, health, disability, language access, legal, technology, and family-stabilization barriers.
- Coordinate public and private resources through the PCC and service partnerships.
- Operate an accurate, transparent, and motivating FSS escrow program.

4. Program Scope and Eligible Families

LHA may serve eligible families receiving Public Housing assistance, tenant-based HCV assistance, PBV assistance, HCV Homeownership assistance, and other programs covered by Part 984, including eligible special-purpose voucher families, subject to program rules and available capacity.

Program	FSS Treatment
Public Housing	Eligible families may enroll in LHA's Public Housing FSS program.
Tenant-Based HCV	Eligible families may enroll; portability is governed by § 984.306.
PBV	Eligible families may enroll; portability/right-to-move issues are coordinated under applicable HCV/PBV rules.
HCV Homeownership	Eligible families may participate where covered by Part 984 and LHA policy.
FYI/FUP, Mainstream, VASH, EHV or successor special-purpose vouchers	Enrollment is available when permitted by the governing voucher and FSS requirements; service coordination will respect program-specific rules and partner roles.

LHA will not establish eligibility restrictions that conflict with Part 984. Previous participation or termination may be considered only through a written, objective, nondiscriminatory policy that allows case-specific review and reasonable accommodation.

5. Family Demographics and Supportive Service Needs

Before final HUD submission, LHA will insert a current demographic profile derived from the active FSS roster, HCV and Public Housing household data, waiting list information, participant needs assessments, and community data. The profile will include number, family size, characteristics, racial and ethnic data, employment and education status, disability and language access needs, and supportive service needs as required by § 984.201.

Required Data Element	FY 2027 Verified Value	Source / Validation
Current enrolled families	191	FSS roster / HUD reporting
Public Housing FSS participants	18	PIC/IMS-PIC or successor / FSS roster
HCV/PBV FSS participants	20	HUD-50058 data / FSS roster
Families with positive escrow balances	80	Finance subsidiary ledger
Average coordinator caseload	50	Staffing and active roster
Primary language-access needs	English, Spanish	LEP analysis / participant records
Priority supportive service needs	Employment, Education, Transportation	Needs assessments / PCC consultation

LEGACY DATA NOTE

The prior editable plan referenced historical program sizes and participant counts. Those figures are not carried forward as current facts unless validated. LHA will preserve historical records in the administrative file and use verified FY 2027 data in the HUD submission.

6. Program Size, Staffing, and Administration

6.1 Program Size

LHA will maintain at least the minimum program size required by HUD unless a lawful reduction, exception, waiver, or MTW authorization applies. Any voluntary expansion beyond the approved Action Plan size will be submitted to HUD when required.

Program Component	HUD-Approved / Board-Approved Size	FY 2027 Operating Target
HCV/PBV FSS	25	50
Public Housing FSS	25	50
Total FSS capacity	125	100

6.2 Staffing Model

- Resident Services leadership provides program oversight, policy alignment, partner coordination, and performance review.
- FSS Program Coordinators manage outreach, enrollment, assessment, CoP/ITSP, coaching, referrals, portability, termination, completion, and reporting.
- HCV/Public Housing eligibility staff coordinate income reexaminations, baseline values, rent changes, portability, lease compliance, and HUD reporting.
- Finance maintains the depository account, subsidiary ledger, monthly deposits, investment income, annual reconciliation, disbursements, and financial reporting.
- Quality assurance performs file reviews, escrow reconciliation, data validation, and corrective action monitoring.

6.3 Caseload Standards

LHA will set caseloads based on funded coordinator positions, participant acuity, geographic dispersion, program mix, grant requirements, and available service partners. Caseload standards are management targets, not participant eligibility criteria. Management will review caseloads at least quarterly and document rebalancing or staffing actions.

7. Outreach, Recruitment, Selection, and Waiting List

7.1 Outreach

- Briefings, orientations, recertifications, interim reviews, portability contacts, lease-up and resident meetings.
- Mail, email, text, website, social media, management offices, community centers, partner referrals, and Resident Advisory Board communications.
- Accessible formats, interpreters, relay services, translated vital information, and reasonable accommodations.
- Targeted outreach to Public Housing, HCV/PBV, special-purpose voucher, youth/FYI, veteran, disability, and homeownership-interested families, consistent with nondiscrimination.

7.2 Objective Selection System

LHA will use the date and time the family submits a complete expression of interest as the objective selection method for slots without a preference. If multiple expressions are received at the same date and time, LHA may use a documented random selection method.

7.3 Optional Related-Service Preference

LHA may reserve up to 50 percent of FSS slots for eligible families with a member currently participating in, or waiting for, an identified FSS-related service program only if the percentage, programs, outreach, and selection method are stated in this HUD-approved Action Plan. Until LHA inserts and HUD approves a specific preference policy, no related-service preference will be applied.

Policy Element	FY 2027 LHA Decision
Percentage of slots with preference	0% unless amended and approved by HUD
Related-service programs	Not applicable unless amended
Selection among equal preference status	Date/time or documented random method
Non-preference slots	Date/time of complete expression of interest

7.4 Motivation Screening

LHA may require orientation, a preselection interview, or readily accomplishable tasks that measure interest and motivation. LHA will not screen based on educational level, credit, employment status, earnings, skills, disabilities, family composition, service needs, or projected likelihood of success. Reasonable accommodations will be offered.

7.5 Waiting List Administration

- Date and time stamp each complete expression of interest.
- Record program type and contact information.
- Conduct periodic outreach to confirm continued interest.
- Do not remove a family without notice and an opportunity to update information, except when contact is impossible after documented attempts.
- Retain selection and nonselection records for monitoring and fair-housing review.

8. Participant Assessment and Individual Training and Services Plans

After selection, the FSS Coordinator will perform a participant-centered needs and strengths assessment and develop an ITSP for the head of FSS family. Any adult family member who elects to participate may have an ITSP. The assessment and plan will reflect individual goals, barriers, resources, responsibilities, target dates, and service referrals.

Assessment Domain	Examples
Employment	Current job, hours, wages, benefits, advancement, job search, career pathway
Education and training	Literacy, GED, postsecondary, credential, apprenticeship, occupational license
Financial capability	Banking, budget, credit, debt, taxes, savings, insurance, fraud prevention
Family supports	Child care, transportation, health, behavioral health, disability, legal, domestic violence services
Housing stability	Lease compliance, rent, landlord issues, utility stability, relocation/portability
Digital access	Device, connectivity, email, online applications, digital literacy
Asset building	Emergency savings, vehicle, business, education, homeownership

Goals will be realistic, individualized, measurable, and agreed upon. LHA will not impose mandatory goals beyond those required by regulation. ITSP revisions require participant and authorized LHA signatures and must remain achievable within the CoP term, including any extension.

9. Contract of Participation

9.1 One Contract Per Family

Each selected family will execute one HUD-approved Contract of Participation with LHA. The family designates the head of FSS family, who does not have to be the rental-assistance head of household. Multiple adult family members may have ITSPs incorporated into the CoP.

9.2 Required Terms

- Rights and responsibilities of LHA and the family.
- Services to be coordinated and activities to be completed by participating adult members.
- Specific interim and final goals in incorporated ITSPs.
- Lease compliance obligation, with the same considerations available to non-FSS families.
- Employment obligation applying to the head of FSS family.
- Welfare-independence goal when required by Part 984.
- Term, extension, modification, completion, termination, escrow, portability, and grievance provisions.

9.3 Term and Effective Date

The CoP term will follow the current HUD form and Part 984. LHA will establish baseline annual income, baseline annual earned income, and baseline monthly rent using the applicable reexamination and timing rules. No staff member may alter the HUD form or required terms without approval from program leadership and legal/compliance review.

9.4 Suitable Employment

Suitable employment will be determined with the head of FSS family based on skills, education, job training, receipt of benefits, disability-related circumstances, and employment opportunities in the jurisdiction. LHA will not impose a rigid universal hours requirement inconsistent with individualized suitability and Part 984. Lawful, verifiable self-employment may satisfy the employment goal when appropriately documented.

9.5 Extensions

LHA may extend the CoP for up to two years when the family submits a written request and LHA determines that good cause exists. Good cause may include circumstances beyond the family's control, such as serious illness, involuntary employment disruption, lack of essential services, or other documented barriers. The decision and revised completion dates will be written and added to the CoP/ITSP.

10. Supportive Services and Community Partnerships

LHA will coordinate, rather than duplicate, services through the PCC and written or documented referral relationships. Participation in a service depends on eligibility, availability, provider rules, and funding. LHA will make reasonable efforts to help families access services but does not guarantee third-party services.

Service Area	Examples of Services	Potential Partners
Workforce	Career assessment, job search, placement, retention, advancement	CareerSource Polk, employers, staffing and training providers
Education	GED, ESL, college, vocational credentials, apprenticeships	Polk State College, schools, adult education, training providers
Financial capability	Budgeting, credit, banking, taxes, debt, consumer protection	Financial institutions, HUD-approved counselors, nonprofits
Child care and youth	Child care, after-school, tutoring, youth development	Child care providers, schools, youth organizations
Transportation	Transit, work-related transportation planning, vehicle readiness	Transit agencies, nonprofits, employers
Health and stability	Physical/behavioral health, disability, recovery, domestic violence, legal aid	Health providers, legal aid, community nonprofits
Homeownership	Readiness, counseling, credit, savings, mortgage education	HUD-approved housing counselors, lenders, Realtors

Service Area	Examples of Services	Potential Partners
Entrepreneurship	Business counseling, licensing, planning, capital readiness	SBDC, chambers, financial institutions

10.1 Unavailable Services

If an essential service becomes unavailable, staff will work with the family to identify alternatives, revise sequencing or timelines, amend the ITSP, or consider a good-cause extension. A family will not be penalized for failure caused by an unavailable service when the family made reasonable efforts and the plan is appropriately revised.

11. Program Coordinating Committee

LHA will maintain a PCC to help secure public and private resources, develop and review the Action Plan, advise program operations, identify service gaps, review aggregate outcomes, and recommend improvements.

11.1 Required Membership

- LHA representatives, including one or more FSS Program Coordinators.
- One or more participants from each HUD rental assistance program served by LHA's FSS program.

11.2 Recommended Membership

- Local government.
- Workforce Innovation and Opportunity Act agencies.
- Welfare and employment agencies.
- Education and training institutions.
- Child care providers.
- Financial empowerment organizations.
- Nonprofit service providers and private businesses.
- Transportation, health, disability, legal, housing counseling, and resident organizations.

11.3 Operations

The PCC will meet at least quarterly when practicable and no less than annually. It will maintain a membership roster, agendas, minutes, resource commitments, recommendations, and conflict/confidentiality safeguards. The PCC will not receive personally identifiable participant information unless authorized and necessary.

12. Escrow Account Administration

12.1 Depository and Subsidiary Ledger

LHA will deposit all FSS escrow funds into a single interest-bearing depository account invested in HUD-approved investments. Finance will maintain a subsidiary ledger showing the balance for each family and prorate investment income based on each family's balance for the applicable period.

12.2 Baseline and Monthly Credits

The escrow credit will be determined at each income reexamination occurring after the CoP effective date and deposited monthly in accordance with 24 CFR 984.305. Escrow calculations will be based on verified data from the housing program and current HUD requirements. Staff will document baseline values, calculation inputs, effective dates, limits, corrections, and quality-control review.

12.3 Annual Statements

At least annually, LHA will provide each family a statement showing beginning balance, deposits, withdrawals, interest, adjustments, and ending balance. Participants may request an explanation or correction. Disputes will be reviewed by FSS, housing program, and Finance staff.

12.4 Underreported Income and Corrections

LHA will apply Part 984 rules when underreported income affects escrow. If underreporting occurred after the baseline was established, credits will be based on the income originally reported as required. If the baseline itself was based on underreported income, LHA will recalculate the escrow using the corrected baseline and subsequent information.

12.5 Reconciliation

- Monthly interface or reconciliation between rent/reexamination data and escrow records.
- Quarterly reconciliation of subsidiary ledgers to the depository account and general ledger.
- Annual independent review by Finance or a staff member not responsible for routine calculations.
- Documented correction of exceptions and participant notification when balances change.

13. Interim Escrow Disbursement

LHA permits interim disbursement when the family has completed one or more interim goals and the funds are needed for a purpose consistent with the CoP and ITSP. Interim disbursement is discretionary, dependent on available escrow, and not an entitlement.

13.1 Eligible Uses

- Education, tuition, books, testing, licensing, tools, uniforms, or training.
- Transportation needed for employment, education, or ITSP goals.
- Child care or dependent-care expenses tied to ITSP progress.
- Credit repair, debt resolution, banking, or financial capability activities.
- Homeownership preparation, inspection, appraisal, or closing-related needs.
- Business start-up or employment equipment with a documented plan.
- Other documented needs directly supporting an approved ITSP goal.

13.2 Review Standards

- Written request stating amount, purpose, goal connection, timing, and supporting documentation.
- Confirmation that the participant completed an applicable interim goal and remains engaged.
- Review of available escrow and prior withdrawals.
- Consideration of alternative resources without requiring exhaustion when delay would impair the goal.
- Written approval or denial by authorized staff; Finance review before payment.

LHA may pay the participant or a third-party vendor, depending on documented risk, purpose, and Finance procedures. A participant does not repay an approved interim disbursement merely because the CoP later ends unsuccessfully, except where fraud, misrepresentation, duplicate payment, or other legal basis supports recovery.

14. Completion, Final Disbursement, Termination, and Forfeiture

14.1 Successful Completion

A family completes the FSS program when it has fulfilled its CoP obligations on or before expiration, including any extension, or meets another completion condition authorized by Part 984. The head of FSS family must have met the suitable employment obligation, and the family must meet the applicable welfare-independence requirement.

14.2 Final Escrow Disbursement

Before final disbursement, LHA will verify completion, welfare status, lease and program obligations, escrow balance, and any amounts permitted to be deducted under 24 CFR 984.305. The final payment and closeout will be documented in the participant and Finance files.

14.3 Termination

LHA may terminate the CoP by mutual consent, for failure to meet CoP obligations after notice and opportunity to cure, when housing assistance ends, upon expiration without completion, or under another condition permitted by Part 984. Termination from FSS does not itself terminate housing assistance.

14.4 Termination with Escrow Disbursement

When Part 984 permits termination with escrow disbursement, LHA will document the applicable authority, circumstances beyond the family's control or other qualifying basis, participant progress, and required approval.

14.5 Forfeited Escrow

Forfeited escrow will be used only as permitted by HUD. LHA may use authorized forfeited funds for eligible FSS program or supportive service purposes, subject to current HUD financial reporting and grant requirements. Finance will separately track sources, uses, approvals, and balances.

15. Portability

During the first 12 months after the CoP effective date, an FSS family generally may not move outside LHA's jurisdiction, but LHA may approve a portability move under applicable HCV rules. After the first 12 months, a tenant-based voucher family may move under portability rules.

34. Before move approval, FSS and HCV staff explain FSS options and contact the receiving PHA.
35. Determine whether the receiving PHA administers FSS and has capacity.
36. If the receiving PHA will enroll the family, coordinate the CoP, ITSP, effective date, expiration date, records, billing/absorption, and escrow transfer.
37. If the family will remain in LHA's FSS program, document that the family can fulfill the existing or modified CoP from the new location.
38. If continued participation is not possible, discuss available options, including contract modification, termination and forfeiture, termination with disbursement when authorized, or locating a PHA with capacity.
39. Document participant counseling, decisions, records transmitted, and escrow reconciliation.

16. Due Process, Civil Rights, Accessibility, LEP, VAWA, and Privacy

16.1 Nondiscrimination and Equal Access

LHA will administer FSS without discrimination and in accordance with applicable fair housing, civil rights, disability, age, sex, national origin, religion, familial status, and equal-access requirements. Selection and services will be based on objective program criteria and individual need.

16.2 Reasonable Accommodation and Effective Communication

LHA will provide reasonable accommodations and effective communication to qualified persons with disabilities. Requests may be oral or written and will be processed under LHA policy. Participants will not be required to disclose more medical information than necessary to evaluate the request.

16.3 Language Access

LHA will take reasonable steps to provide meaningful access to persons with limited English proficiency under applicable federal law and LHA's LEP Plan. FSS notices, orientations, CoP/ITSP discussions, hearings, and vital communications will include interpretation or translation when required.

16.4 VAWA and Safety

FSS will coordinate with LHA's VAWA policies when domestic violence, dating violence, sexual assault, or stalking affects participation, safety, portability, missed appointments, housing stability, or service needs. Information will be handled confidentially and referrals will prioritize participant safety.

16.5 Informal Review / Hearing

Adverse FSS decisions will include the reason, effective date, deadline and method to request review, available accommodation/language assistance, and effect on escrow. A hearing officer who did not make or approve the challenged decision will conduct the review when required by LHA policy or applicable program rules.

17. MTW Integration and Safeguards

LHA will coordinate FSS with approved MTW activities that support cost effectiveness, employment and self-sufficiency, asset building, and housing choice. Unless an approved MTW waiver expressly changes a requirement, LHA will administer FSS under 24 CFR Part 984 and this HUD-approved Action Plan.

MTW Area	FSS Integration	Safeguard
Asset building	Financial coaching, savings, escrow education, banking, credit, and homeownership readiness	Do not commingle or substitute FSS escrow without approved authority; disclose program differences.
Work incentives	Coordinate employment, education, and career advancement services	Apply approved rent/earnings rules and adopted hardship protections.
Administrative streamlining	Align outreach, forms, data, case contacts, and reporting	Maintain required CoP, ITSP, escrow, reporting, and participant rights unless expressly waived.
Resident engagement	Use PCC, RAB, surveys, focus groups, and participant feedback	Provide notice, meaningful access, civil-rights review, and public process required by MTW.
Performance evaluation	Use common economic-mobility metrics	Separate statutory/HUD reporting from local performance targets.

LOCAL MTW POSITION

LHA's 2026 MTW materials indicated continuation of the FSS program as designed and no changes to identified PCC, selection, CoP, or income-treatment waivers. This FY 2027 plan therefore preserves Part 984 requirements unless a later HUD-approved MTW Supplement expressly changes them.

18. HOTMA and Housing Program Coordination

FSS escrow depends on income, earned income, rent, and reexamination data produced by the Public Housing and HCV programs. LHA will coordinate implementation of HOTMA income, asset, deduction, interim reexamination, verification, and reporting changes with FSS calculations and participant communications.

- Use housing-program determinations as the source for baseline and subsequent income/rent data.
- Test software and manual calculations before implementation changes affect escrow.
- Document effective dates and avoid retroactive changes not authorized by HUD.
- Explain to families that FSS escrow and HOTMA asset treatment are governed by separate but interacting rules.
- Coordinate corrections among FSS, HCV/Public Housing, Finance, and quality assurance.

19. Performance Standards, Reporting, and Quality Assurance

19.1 HUD Reporting

LHA will submit FSS reports in the form prescribed by HUD. Reporting will describe program activities, effectiveness in supporting economic independence and self-sufficiency, enrollment and graduation, escrow accounts and positive balances, effectiveness of community resource coordination, and recommended legislative or administrative improvements.

19.2 Local Performance Dashboard

Measure	Definition	Frequency	FY 2027 Target
Enrollment	Active families with executed CoP	Monthly	5

Measure	Definition	Frequency	FY 2027 Target
Engagement	Participants with documented contact/progress review	Quarterly	≥ 85%
ITSP progress	Participants completing at least one planned milestone	Quarterly	≥ 70%
Employment	Participants newly employed or advancing	Quarterly	Track baseline and change
Education/credential	Completed GED, degree, certificate, license, or training	Quarterly	Track baseline and change
Escrow accuracy	Reviewed files with correct baseline, credit, and ledger	Quarterly	≥ 95%
Annual statements	Statements issued by required date	Annual	100%
Graduation	Successful completions	Quarterly/Annual	Track count and rate
PCC participation	Required representation and meetings documented	Annual	100% compliance
Participant experience	Positive rating on survey/exit interview	Annual	≥ 80%

Local targets are management standards and do not create participant eligibility or termination criteria. Management may revise targets based on verified baseline data, staffing, grant requirements, and Board direction without changing participant rights or required Part 984 policies.

19.3 Quality Assurance

- Quarterly sample review of participant files, CoPs, ITSPs, baseline data, escrow calculations, notices, and reporting.
- Monthly or quarterly data reconciliation among FSS, housing program, and Finance systems.
- Corrective action logs with owner, due date, verification, and closure.
- Annual management review of Action Plan compliance, PCC membership, program size, and HUD reporting.

20. Funding, Financial Controls, and Procurement

LHA may use eligible Public Housing funds, HCV administrative fees, FSS appropriated funds, MTW funds where authorized, forfeited escrow funds where permitted, grants, donations, and partner resources for allowable FSS costs. Each funding source will be separately identified and used according to its legal and grant restrictions.

- FSS coordinator grant funds will be used only for eligible purposes and positions.
- Participant assistance will be supported by eligibility, approval, invoice/receipt, and payment records.
- Procurement of services, training, technology, transportation, or consultants will follow LHA's Procurement Policy and applicable 2 CFR Part 200 requirements.
- No participant or partner commitment will exceed available funding or contractual authority.

21. Risk Management, Records, and Monitoring

Risk	Control
Incorrect CoP or baseline	Standard checklist; housing-program verification; supervisor review
Escrow calculation error	System/manual validation; monthly reconciliation; quarterly sample review
Ineligible interim disbursement	Written request; goal verification; documented approval; Finance review
Missing participant contact	Engagement schedule; documented outreach; accommodation and barrier review
Improper termination	Notice, cure opportunity, supervisory review, hearing rights
Privacy breach	Role-based access, minimum necessary information, secure transmission, retention/destruction controls
MTW conflict	Approved-waiver crosswalk; legal/compliance review; participant notice and safeguards
Reporting error	Source reconciliation, certification, correction log, management approval

21.1 Records Retention

LHA will retain Action Plans, HUD approvals, PCC records, participant files, CoPs, ITSPs, escrow records, calculations, statements, disbursements, notices, hearings, reports, and grant records for the period required by HUD, federal award rules, LHA's records schedule, and applicable law. Litigation, audit, claim, or investigation holds override routine destruction.

22. Implementation Schedule and Revision Control

Action	Responsible Unit	Target / Trigger
Validate participant demographics and program size	FSS / HCV / Public Housing / Finance	Before HUD submission
PCC consultation and participant review	FSS leadership	Before HUD submission and annually
Board approval	Executive Office / Board	Prior to effective date
HUD submission/approval	Authorized official	When required by § 984.201
Staff training	Resident Services / Compliance / Finance	Before implementation and annually
Escrow reconciliation and baseline review	Finance / FSS / QA	Before implementation; quarterly thereafter
Performance dashboard launch	Resident Services / Data	Within first reporting quarter
Annual Action Plan review	FSS / PCC / Compliance	At least annually

22.1 Revision History

Revision	Date	Description	Approval
FY 2027 Comprehensive Revision	[Insert]	Replaces prior draft; aligns with current Part 984; adds MTW, performance, controls, and appendices.	Board/HUD as applicable

Appendix A. 24 CFR Part 984 Crosswalk

Citation	Requirement	Plan Section
984.101-104	Purpose, applicability, voluntary participation, definitions, basic requirements	1-4
984.105-107	Minimum size, cooperative agreements, funding formula	6, 20
984.201	HUD-approved Action Plan and required contents	2-22
984.202	PCC functions and membership	11, Appendix F
984.203	Selection, preference limits, objective system, motivation screening	7
984.204	On-site facilities, where applicable	10
984.301-302	Implementation, staffing, FSS funds	6, 20
984.303	CoP, ITSP, goals, employment, term, extension, completion, termination	8-9, 14
984.304	Rent and income increases	12, 18
984.305	Escrow establishment, credit, reporting, disbursement, forfeiture	12-14
984.306	HCV portability	15
984.401	HUD reporting	19

Appendix B. Program Performance Dashboard

Reporting Period	Enrollment	Engagement	Employment Gains	Education/Credentials	Positive Escrow	Graduations	Exceptions/Open Corrective Actions
Q1	198	60 %	25%	N/A	70 %	1	N/A
Q2	215	65 %	27%	N/A	70 %	0	N/A
Q3	215	65 %	27%	N/A	76 %	0	N/A
Q4	214	64 %	30 %	N/A	75 %	0	N/A

Appendix C. Participant File Checklist

- ☐ Expression of interest / application
- ☐ Eligibility and program type verified
- ☐ Selection/waiting list documentation
- ☐ Orientation attendance
- ☐ Civil rights, LEP, accommodation screening
- ☐ Needs/strengths assessment
- ☐ Head of FSS family designation
- ☐ Executed current HUD CoP
- ☐ ITSP for head of FSS family
- ☐ Optional ITSPs for other adults
- ☐ Baseline income/earned income/rent documentation
- ☐ Escrow calculation and QC
- ☐ Participant contact notes

- ☐ Referrals and outcomes
- ☐ Annual escrow statements
- ☐ Interim disbursement records
- ☐ CoP/ITSP modifications
- ☐ Extension request/decision
- ☐ Portability records
- ☐ Completion/termination review
- ☐ Final escrow/forfeiture records
- ☐ Exit survey and closeout

Appendix D. Escrow Administration Checklist

- ☐ HUD-approved depository/investment confirmed
- ☐ Family subsidiary ledger established
- ☐ Baseline values verified
- ☐ Monthly credits posted
- ☐ Investment income prorated
- ☐ Housing-program changes reconciled
- ☐ Annual statement issued
- ☐ Underreported income reviewed
- ☐ Interim withdrawal documented
- ☐ Final offsets verified
- ☐ Final disbursement approved
- ☐ Forfeiture tracked and used only as authorized
- ☐ General ledger and bank reconciliation complete
- ☐ QA review complete

Appendix E. Interim Disbursement Request and Determination

Field	Entry
Participant / Family ID	Shameka Sims
Requested amount and date needed	\$1,958 requested on 6/24/2026
Purpose and ITSP goal	Pay outstanding collection balance to pursue homeownership.
Completed interim goal	Yes
Supporting documentation	Attached
Alternative resources considered	N/A
Available escrow balance	\$10,638.87
Prior interim disbursements	None
Coordinator recommendation	Approve
Supervisor determination and reason	Approve
Finance verification	Completed

Payment method / payee	Check issued
Signatures / dates	Attached

Field	Entry
Participant / Family ID	Sheryl Williams
Requested amount and date needed	\$4,297 requested on 6/24/2026
Purpose and ITSP goal	Pay nursing school tuition balance.
Completed interim goal	Yes
Supporting documentation	Attached
Alternative resources considered	N/A
Available escrow balance	\$4,634.19
Prior interim disbursements	None
Coordinator recommendation	Approve
Supervisor determination and reason	Approve
Finance verification	Completed
Payment method / payee	Check issued
Signatures / dates	Attached

Field	Entry
Participant / Family ID	Joann Snelson
Requested amount and date needed	\$4,500 requested on 3/2/2026
Purpose and ITSP goal	Pay outstanding collection balance to pursue homeownership.
Completed interim goal	Yes
Supporting documentation	Attached
Alternative resources considered	N/A
Available escrow balance	\$26,894.02
Prior interim disbursements	None
Coordinator recommendation	Approve
Supervisor determination and reason	Approve
Finance verification	Completed
Payment method / payee	Check issued
Signatures / dates	Attached

Appendix F. PCC Charter and Membership Matrix

Purpose: Secure resource commitments, participate in Action Plan development and review, support program operations, identify service gaps, review aggregate outcomes, and recommend improvements. The PCC does not decide individual participant eligibility, termination, or escrow matters.

Representation	Required / Recommended	Member / Organization	Term / Contact
LHA representative	Required	Tye Parker	2026-2027
FSS Coordinator	Required	Tye Parker	2026-2027
Public Housing participant	Required if served	N/A	N/A
HCV/PBV participant	Required if served	N/A	N/A
Local government	Recommended	N/A	N/A
Workforce agency	Recommended	Career Source Polk	2026-2027
Education/training	Recommended	Polk State College	2026-2027
Child care	Recommended	Early Learning Coalition of Polk County	2026-2027
Financial empowerment	Recommended	HANDS of Central Florida	2026-2027
Nonprofit/service provider	Recommended	N/A	N/A
Private employer/business	Recommended	N/A	N/A

Appendix G. Supportive Services Matrix

Need	Primary Referral	Backup Referral	Eligibility / Wait Time	Outcome / Follow-Up
Employment	CareerSource Polk	Kelly Services	30 days	Yearly workshops are held every 1 st quarter. Referrals as needed.
Education/training	Polk State College	Travis College	30 days	Referrals as needed.
Child care	Early Learning Coalition of Polk County	N/A	30 days	Referrals as needed.
Transportation	Citrus Connection of Polk County	N/A	30 days	Yearly workshops are held every 2nd quarter. Referrals as needed.
Financial capability	Regions Bank	Wells Fargo	30 days	Referrals as needed.
Health/behavioral health	Peace River	N/A	30 days	Referrals as needed.
Disability services	Access Florida	N/A	30 - 60 days	Referrals as needed.
Legal services	Exploring Options	N/A	30 days	N/A
Homeownership	HANDS of Central FL	Solita's House	30 days	Monthly Seminars are held every Friday of each month.
Digital access	Exploring Options	N/A	30 days	N/A

Appendix H. Annual Goal-Tracking Framework

Program Stage	Core Activities
Enrollment / First 90 days	Orientation, assessment, CoP, baseline, ITSP, initial referrals, contact schedule.
Year 1	Stabilization, employment/education plan, financial baseline, barrier reduction, first milestones.
Year 2	Credential progress, employment entry/retention, credit and savings plan, ITSP update.
Year 3	Wage progression, advanced training, debt reduction, asset building, midterm review.
Year 4	Career advancement, completion of major goals, homeownership/business readiness if selected.
Year 5	Final employment and welfare-independence verification, outstanding goals, graduation and escrow planning.
Extension	Good-cause goals only; revised deadlines, contact schedule, and completion plan.

Appendix I. Portability Checklist

- ☐ Move timing reviewed under § 984.306
- ☐ Initial 12-month restriction/exception reviewed
- ☐ Receiving PHA contacted
- ☐ Receiving PHA FSS capacity determined
- ☐ Billing or absorption identified
- ☐ Continued participation option analyzed
- ☐ CoP/ITSP modification completed
- ☐ Escrow balance reconciled/transferred
- ☐ Participant counseled in writing
- ☐ Records transmitted securely
- ☐ Effective and expiration dates confirmed

Appendix J. Termination and Hearing Checklist

- ☐ Specific CoP/ITSP obligation identified
- ☐ Accommodation/LEP/VAWA considerations reviewed
- ☐ Participant contacted and barrier review completed
- ☐ Opportunity to cure offered where appropriate
- ☐ Supervisor approval obtained
- ☐ Written notice gives facts, effective date, escrow effect, and hearing deadline
- ☐ Housing assistance non-interference stated
- ☐ Impartial hearing officer assigned
- ☐ Decision issued in writing
- ☐ Escrow disposition and file closeout completed

Appendix K. References and Source Notes

Source	Use
24 CFR Part 984, current eCFR through August 2026	Controlling FSS regulatory framework.
HUD Family Self-Sufficiency webpage and resources	Current program resources, funding notices, forms, guidebook, and training references.
HUD FSS Program Guidebook (January 2023)	Evidence-informed and promising-practice program design.
HUD FSS online training / escrow module	Escrow communication, calculation resources, and financial capability practices.
LHA FSS Action Plan 2026 PDF	Legacy LHA program structure, service categories, local practices, and historical policies.
LHA editable FSS Action Plan draft	Editable source for prior LHA plan language and appendices.
LHA FY 2027 Agency Plan / MTW Supplement materials	Formatting, agency strategy, Resident Services, MTW, and economic-mobility alignment.
LHA 2026 MTW Amendment	Local MTW position on continuing FSS as designed and not modifying identified FSS waivers.