

LAKELAND HOUSING AUTHORITY

BOARD-READY SUMMARY

MAIN COMPLIANCE CHANGES IN THE FY 2027 UPDATED POLICIES

Annual Agency Plan Package | Resolution No. 26-1575

Board Item	Information
Board Meeting	September 21, 2026
Package	FY 2027 Annual Agency Plan, MTW Supplement, Operating Budget, Program Policies and HUD Certifications
Requested Action	Adopt the updated plans and policies; approve required forms and submissions; authorize implementation and non-substantive technical corrections.
Purpose	Provide Commissioners with a concise cross-policy explanation of the principal new compliance requirements and management controls.

EXECUTIVE TAKEAWAY. The package moves LHA from separate program manuals toward a coordinated compliance framework. The recurring themes are HOTMA and NSPIRE implementation, MTW controls, RAD resident protections, fair housing and accessibility, stronger financial and procurement documentation, defined implementation ownership, annual training, file monitoring, corrective action and Board reporting.

1. Executive Compliance Dashboard

Compliance Area	What Changed	Board / Management Significance
HUD planning and certifications	The Annual Plan package links HUD-50075-ST, MTW, budget, policies, public process and certifications under one adoption record.	Board action and executed forms must match the final plan year, PHA data, public record and approved policies.
HOTMA	HCV and Public Housing policies add updated income, asset, deduction, verification, hardship, reexamination and error-correction controls.	Implementation must follow the legally effective MTW schedule, current HUD forms and tested software configurations.
NSPIRE / NSPIRE-V	Inspection, maintenance, life-safety, correction, documentation and quality-control requirements are integrated across program and maintenance policies.	Requires coordinated inspection standards, work-order response, records and staff training.
MTW	Activities are restricted to approved authority, safe harbors, statutory requirements, hardship protections, impact analysis and reporting.	Flexibility is not open-ended; each activity requires documented controls and HUD-consistent reporting.
RAD / Section 18	Policies add right to return, no rescreening solely because of conversion, relocation, accessible communication, grievance and post-conversion protections.	Resident rights and project approvals must be documented at every transaction stage.
Civil rights	ADA/Section 504, LEP, VAWA, fair housing, accessible units, digital access, assistance animals and effective communication are coordinated across programs.	Creates agency-wide workflows rather than property-by-property informal practices.
Financial stewardship	Budget monitoring, HAP protection, Capital Fund controls, segregation of duties, banking verification and audit support are strengthened.	Requires recurring reconciliation, management review and exception escalation.
Procurement	The policy expands planning, competition, cost/price analysis, BABA, Section 3, federal clauses, Florida requirements, contract administration and closeout.	Compliance must be shown transaction by transaction through a complete procurement file.
Workforce / HR	The Employee Handbook modernizes ethics, FTO, retirement, technology/AI, cybersecurity, records, safety and workplace conduct.	Requires employee acknowledgment, training and consistent supervisory enforcement.

2. HCV Administrative Plan and Public Housing ACOP

Housing Choice Voucher Administrative Plan

- Governance and controlling authority: the updated plan states that Board-adopted policy, HUD requirements, the ACC, PHA Plan and approved MTW Supplement govern; written procedures may implement but not contradict the plan.
- HOTMA operations: updated controls cover income, assets, deductions, verification, interim and regular reexaminations, hardship, error correction and quality assurance.
- NSPIRE-V: inspection standards, deficiency response, owner and family responsibilities, quality control and reporting are integrated into HCV/PBV administration.
- MTW funding flexibility: only eligible funding covered by MTW authority may be used flexibly; special-purpose voucher funds and excluded increments remain restricted. Fund accounting, cost allocation, procurement, audit support and HAP protection are required.
- RAD/PBV: the plan includes continued-assistance, no-rescreening, relocation, right-to-return, rent phase-in, grievance/hearing, accessibility and choice-mobility controls for applicable conversions.
- Financial reporting: source systems are to be reconciled to the general ledger and HUD submissions, including MTW, HUD-50058 MTW Expansion, VMS, FDS and PHA Plan reporting.

Admissions and Continued Occupancy Policy

- Admissions and waiting lists: site-based administration, verified preferences, income targeting, deconcentration and accessible application methods are documented.

- Occupancy and leasing: bedroom-size standards, unit offers, accessible-unit assignments, guests, absences, transfers, lease rules and house rules are consolidated.
- HOTMA and rent: public housing income, assets, deductions, minimum rent, hardship, flat rent, utility allowances, reexaminations and interim changes are updated.
- NSPIRE and maintenance: move-in, move-out, annual/risk-based, complaint, emergency and quality-control inspections are coordinated with correction and life-safety response requirements.
- RAD protections: resident notice and consultation, no displacement because of conversion, right to return, no new-admission rescreening, relocation benefits, accessibility, VAWA, post-conversion rent/lease protections and grievance rights are included.
- Due process and integrity: evidence-based screening, mitigating circumstances, VAWA, reasonable accommodation, grievance, termination, debt, repayment and records controls are strengthened.

OPERATIONAL PRIORITY. HCV and Public Housing staff should use aligned desk guides, notices, calculation worksheets, approval levels and quality-control samples so the same HOTMA, civil-rights and recordkeeping concepts are administered consistently across programs.

3. Civil Rights, Accessibility and Language Access

ADA, Section 504 and Reasonable Accommodation

- Creates a defined request and interactive-process workflow for oral or written requests, limited verification, effective alternatives, written decisions and review rights.
- Limits disability verification to information needed to establish disability-related need when the need is not obvious or already known; diagnosis and unrelated medical information are not required.
- Coordinates accessible units, waiting lists, transfers, physical modifications, auxiliary aids, relay/ASL/captioning, alternate formats, digital accessibility, assistance animals, emergency communication and relocation.
- Requires restricted access to disability information, implementation tracking, staff training, quarterly file sampling and annual program/facility/communication/digital review.
- Expressly coordinates Public Housing, HCV/PBV, FSS, RAD/relocation, development, MTW and NSPIRE responsibilities.

Limited English Proficiency and Language Access

- Updates the legal framework to address Executive Order 14224 and HUD Notice PIH 2026-06 while maintaining Title VI and other applicable language-access responsibilities.
- Requires a current four-factor assessment, identification of language needs, a vital-document inventory, free language-assistance notice and qualified interpretation/translation resources.
- Distinguishes appropriate uses of qualified in-person, remote and telephone interpreters, bilingual staff, family members and minors, especially for hearings, relocation, termination, VAWA, safety and other high-stakes encounters.
- Adds digital, telephone, remote-meeting, public-meeting, vendor, data, privacy, quality-assurance, complaint, non-retaliation and corrective-action requirements.
- Requires coordinator designation, departmental contacts, annual assessment, staff training, document/website updates, vendor readiness and annual reporting.

4. Financial, Procurement and Physical-Asset Controls

Cash Handling, Banking and Disbursement

- Extends the control framework beyond physical cash to checks, cards, payment portals, merchant services, ACH/EFT, wires, real-time payments and online banking.
- Requires segregation of duties across receipt, custody, deposit, recording, approval, release, reconciliation and review functions.
- Adds independent verification for vendor and employee banking changes and stronger controls over signatories, online access, positive pay, stop payments and federal funds.
- Adds physical security, business continuity, cybersecurity, fraud prevention, incident response, privacy, retention, audit readiness, monitoring and discipline.

- Includes operational appendices for daily closeout, deposits, ACH/wire authorization, banking-change verification, reconciliation and fraud response.

Procurement

- Aligns procurement planning and administration with 2 CFR Parts 184 and 200, HUD requirements and applicable Florida public-agency requirements.
- Expands ethics, conflicts, gifts, organizational conflicts, independent cost estimates, cost/price analysis, competition, evaluation, responsibility and award documentation.
- Adds Build America, Buy America and domestic-preference review, Section 3 and socioeconomic outreach, federal contract clauses, bonding, labor and construction requirements.
- Defines controls for cooperative purchasing, piggybacking, noncompetitive/emergency procurement, contract modifications, claims, protests, remedies and closeout.
- Requires role-based training, periodic file review, corrective action and annual policy review; the policy expressly rejects blanket compliance self-certification and requires transaction-level evidence.

Comprehensive Maintenance Plan

- Creates agency-wide standards for Public Housing, HCV/PBV-related activities, MTW, LIHTC, HOME, SAIL and mixed-finance communities.
- Requires written departmental procedures defining responsibilities, timelines, documentation, internal controls, quality review, corrective action, training and monitoring.
- Integrates preventive maintenance, unit turns, emergency and routine work orders, life-safety equipment, inspections, accessibility, capital planning and resident communication.
- Requires maintenance records to support audits, inspections, Board reporting and funding-compliance reviews.
- Coordinates NSPIRE, Section 504, procurement and financial-management requirements with physical-asset operations.

5. Resident Self-Sufficiency and Workforce Compliance

Family Self-Sufficiency Action Plan

- Restates the governing framework under Section 23 of the U.S. Housing Act and 24 CFR Part 984 and coordinates HCV, PBV, Public Housing, homeownership and applicable program rules.
- Requires a HUD-approved Action Plan before operating a mandatory or voluntary FSS program.
- Requires consultation with local government, the Program Coordinating Committee, participants, workforce, education, childcare, financial empowerment, nonprofit and business partners.
- Requires HUD submission of revisions when policy changes are proposed, the size of a voluntary program increases, or HUD requires changes.
- Coordinates Contract of Participation, Individual Training and Services Plan, supportive services, escrow, portability, due process, performance monitoring and records.

Employee Handbook

- Employment of relatives and friends now includes detailed disclosure, recusal, supervision and mitigation requirements.
- The 401(a) employer contribution reference is updated to 8.5 percent, subject to official plan documents and eligibility.
- FTO provisions expand eligibility, accrual, protected-leave coordination, carryover, donation bank, separation payout, misuse review and supervisor responsibilities.
- Dress and appearance provisions are expanded for office, field and maintenance/safety-sensitive roles, casual days, tattoos/body art, fragrance, badges, remote meetings and enforcement.
- Public records and confidentiality provisions strengthen retention, routing, employee/resident privacy and media communication.
- Technology, artificial intelligence and cybersecurity provisions add electronic communication, monitoring, data protection, device security and information-protection expectations.
- Safety and drug-free-workplace provisions expand emergency, workplace violence, weapons, hazard communication and substance-abuse requirements.

6. Forms, Certifications and Submission Controls

Form / Record	Compliance Purpose	Finalization Control
HUD-50075-ST	Annual PHA Plan submission and identification of revised plan elements, capital improvements, audit status, comments and certifications.	Reconcile PHA data, current activities, EPIC reference date, public process and attachments.
MTW Supplement / HUD-50075-MTW	Reports or requests MTW activities, waivers, safe harbors, impacts, hardships, statutory requirements and outcomes.	Use only approved authority; align activity status, metrics and hardship policies.
HUD-52574	Board resolution approving the Public Housing operating budget.	Match Resolution No. 26-1575, fiscal year, approved budget and signatures.
HUD-50077-ST-HCV-HP	Certifies compliance with PHA Plan, civil-rights and related regulatory requirements, including AFFH.	Complete authorized signatures; ensure statements are supported by actual policy and practice.
HUD-50077-SL	State/local certification of consistency with the Consolidated Plan.	Obtain the proper local official signature and remove placeholders.
HUD-50071	Certification regarding payments to influence federal transactions.	Complete as applicable using current form and authorized signer.
SF-LLL	Disclosure of lobbying activities when disclosure is required.	Submit only when applicable and ensure consistency with HUD-50071.
HUD-2991	Certification included in the package, subject to final form-purpose and version validation.	Confirm applicability, current version, entries and signature before submission.
Board Resolution 26-1575	Adopts the Annual Plan, MTW Supplement, budget, policies and certifications and authorizes implementation/submission.	Minutes and attachment list must clearly identify what the Board approved.
Public process record	Notice, RAB consultation, hearing record, comments and responses.	Retain publication, availability, accessibility/LEP support and final comment disposition.

CERTIFICATION DISCIPLINE. A signed certification is not a substitute for operational compliance. Each certification should be supported by final adopted policies, completed public process, reconciled data, trained staff, documented procedures and an auditable record.

7. Implementation Priorities After Board Adoption

Priority	Required Management Action	Evidence for Board / Audit
1. Controlled documents	Publish final adopted versions; archive prior versions; update document register and effective dates.	Signed resolution, master PDF/DOCX, revision log.
2. Procedures and forms	Issue program desk guides, notices, workflows, checklists, decision templates and escalation routes.	Procedure index and approved forms.
3. Training	Deliver role-specific training on HOTMA, NSPIRE, MTW, RAD, civil rights, language access, procurement, financial controls, HR and records.	Attendance, materials and competency checks.
4. Systems and data	Configure/test software; reconcile general ledger, VMS, FDS, EPIC, LOCCS and relevant HUD records.	Test scripts, reconciliation and exception log.
5. File quality assurance	Use risk-based file samples and corrective-action tracking.	Monthly/quarterly QA reports and closure evidence.
6. Public-facing communication	Update websites, notices, application/briefing materials, language-assistance notice and accessibility contacts.	Published materials and accessibility review.

Priority	Required Management Action	Evidence for Board / Audit
7. Governance reporting	Report material compliance risks, deadlines, policy exceptions, audit issues and corrective action to executive leadership and the Board.	Dashboard, minutes and management certification.

8. Recommended Board Summary

RECOMMENDED ACTION. Approve the FY 2027 Annual Agency Plan package and updated policies under Resolution No. 26-1575; authorize required HUD submissions and certifications; direct implementation through written procedures, forms, training and monitoring; and permit non-substantive technical corrections required by controlling authority.

- The updates materially strengthen coordination across Public Housing, HCV, PBV, MTW, RAD, FSS, maintenance, finance, procurement, human resources and civil-rights functions.
- The most significant compliance changes affect HOTMA, NSPIRE/NSPIRE-V, MTW governance, RAD resident protections, ADA/Section 504, language access, procurement documentation, financial controls and workforce requirements.
- The package establishes clearer owners, recurring training, file monitoring, annual review, corrective action and Board reporting.
- Final HUD submission should occur only after all forms, dates, signatures, inventory figures, budget/grant figures, public-process records and cross-document policy values are reconciled.

Source Documents Reviewed

- LHA FY 2027 Annual Agency Plan Package and Comprehensive Annual Agency Plan
- HCV Administrative Plan, HOTMA/MTW/RAD Comprehensive Operations Edition
- Admissions and Continued Occupancy Policy, HOTMA/MTW/RAD Comprehensive Operations Edition
- FSS Action Plan, FY 2027
- Comprehensive Maintenance Plan, FY 2027
- ADA, Section 504 and Reasonable Accommodation Policy, FY 2027
- Limited English Proficiency and Language Access Policy, FY 2027
- Comprehensive Cash Handling, Receipts, Banking and Disbursement Policy, FY 2027
- Procurement Policy, FY 2027
- Employee Handbook, 2027 Final Expanded Edition
- HUD certifications and budget/plan forms included in the package