

# Family Self-Sufficiency Program

Action Plan - DRAFT

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Upon request, Housing Connect makes accommodations for people with disabilities.

Housing Connect

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Housing Connect  
Family Self Sufficiency Program Action Plan  
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## Introduction

The Family Self-Sufficiency (FSS) program is a federally funded program under the Department of Housing & Urban Development (HUD). It was created with the purpose of connecting participants on HUD housing assistance with existing public and private resources in their communities to support increased economic self-sufficiency.

Housing Connect was established in 1970 by a group of citizens concerned with the housing needs of moderate and low-income families. Housing Connect's mission is to provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency, empowerment and neighborhood revitalization.

Housing Connect began its FSS program in 1993. Housing Connect currently operates the FSS program as part of the Resident Services Department and serves families in ~~both~~ Public Housing (PH), ~~and~~ Housing Choice Voucher (HCV), Project Base Voucher (PBV), and Rental Assistance Demonstration (RAD) programs.

The FSS Action Plan contains the policies and procedures of Housing Connect's FSS program. It is designed to reflect the services the program provides to the participants it serves.

## Summary of Program

The FSS program is a service offered free of charge to residents in Housing Connect's PH, PBV, RAD and HCV programs. Once enrolled, FSS participants receive individualized case management and service coordination by an FSS case manager. These services support the participants in reaching their employment goals and any other goals they choose to set while on the FSS program. In addition to employment goals, many participants choose to set goals related to improving their financial standing, increasing their education or preparing for homeownership. The Contract of Participation has a five-year term ~~that begins on the first re-examination of income after the execution of the CoP. , though the~~ ~~the~~ However, the participant may withdraw or complete the program prior to that time. ~~If a family decides not to enroll in FSS, their participation in Housing Connect's rental assistance program will not be affected.~~

## Program Size and Family Demographics

The FSS program at Housing Connect is a voluntary FSS program. The current voluntary program size is ~~175480~~ FSS families, with a maximum capacity of 250 families. ~~Based on the current population of the FSS program expects to serve the following demographics:~~

- 60% White/Non-Hispanic
- 18% Black/African American
- 13% Hispanic

- 3% Asian
- 3% American Indian/Pacific Islander
- 3% Multi-Racial

Expected service needs of the population include but are not limited to: Employment Training, Resume Building, Transportation, Child Care, Financial Literacy, Homeownership, and Education

### **Program Coordinating Committee**

In accordance with HUD regulations, a Program Coordinating Committee (PCC) must be created and maintained to assist in “securing commitments of public and private resources for the operation of the FSS program.” Currently the PCC consists of members representing self-sufficiency programs from area housing authorities, nonprofit service providers, and government agencies. The PCC is utilized for guidance on the development and implementation of the FSS program. It is also utilized in the continued coordination and improvement of resources provided to our shared participant base and avoiding duplication of services and activities. The PCC meets quarterly and may conduct business on an as-needed basis via email, telephone conferences, video conferencing, and in-person meetings. In person meetings take place at Bud Bailey Apartments, 3970 South Main Street Building C, Millcreek, Utah, 84107.

### **Outreach Efforts**

Outreach efforts for the FSS program may include, but are not limited to:

- Mass mailing of program information to current Housing Connect residents.
- Informational flier included in Annual Re-exam Packets.
- Program information available on the Housing Connect website.
- Door to door recruiting for Public Housing tenants.
- Presentations at Public Housing tenant meetings.
- Presentations for all families entering the PH or HCV programs.
- Presentations at quarterly Program Coordinating Committee (PCC) meetings or directly with PCC member organizations.
- For Family Unification Program (FUP) Youth, case managers at Department of Child and Family Services (DCFS) and Volunteers of America (VOA) will receive information on the FUP/FSS Demonstration, which will include information on eligibility, the referral process, and program requirements. Outreach may be expanded to additional partners as identified.

Outreach materials will be available in English, but upon request, the FSS program will provide the information in another language in accordance with Housing Connect’s Language Access Plan.

Outreach efforts will be targeted equally to minority and non-minority families to ensure that non-English and limited English speaking families receive information and have the opportunity to participate in the FSS program. Upon request, the Housing Connect FSS program provides reasonable accommodations for people with disabilities.

### **Family Selection Procedures**

Housing Connect will select families for participation in the FSS program in accordance with HUD guidelines and the policies defined below. The FSS program is voluntary and a decision to participate, or not participate, will not affect admission, or continued assistance, for the ~~Public Housing or Housing Choice Voucher programs~~ Public Housing (PH), Housing Choice Voucher (HCV), Project Base Voucher (PBV), and Rental Assistance Demonstration (RAD) programs.

Housing Connect's FSS Program Coordinator will receive all FSS applications to verify active participation in ~~an eligible housing program as determined by HUD~~ the HCV or PH program and determine eligibility for the FSS program. Eligibility for FSS requires the following:

- ~~Family is an active recipient of Housing Connect's HCV, PBV, RAD or Public Housing programs, or meets Port-in requirements (see Housing Choice Voucher Portability and FSS Participation on page 15), or receives a FUP Youth voucher.~~
- Family does not exceed the Income Limit for the FSS program.
- ~~CoP signer~~Head of family is an Eligible Citizen or Eligible Non-citizen.
- Previous FSS family has been off the FSS program for a minimum of one year.
- ~~FUP Youth are eligible to enroll in FSS as part of the FUP/FSS program.¶ Demonstration during a 90-day enrollment window. This window of time starts at the initial notification from the FSS program after lease up of the FUP voucher. For current FUP Youth participants, this window starts with initial notification of the Demonstration.¶~~

Once eligibility is determined, applications are then distributed to FSS case managers, as slots are available. If the program is at capacity, applicants will be added to the FSS waiting list until space is available. In general, applicants will be served in the order in which their FSS applications are received. Federal regulations state that Housing Connect's FSS program may exercise its right to give preference on the FSS waiting list for up to 50 percent of the total number of FSS slots to applicants who are participants in a related service program. Therefore, Housing Connect will give preference on the FSS waiting list for up to 90 applicants participating in an FSS related service program. These related service programs include the following categories:

1. Current FSS families who port-in to Housing Connect.
2. Current participants in programs providing self-sufficiency related supportive services through Housing Connect including Permanent Supportive Housing, Youth and Family Services program ~~Prevention programs, and Family Services programs.~~ A

Housing Connect staff member will confirm active participation in these related programs.

3. Individuals referred through Program Coordinating Committee (PCC) members who are receiving FSS related services in the community.

4. Youth who receive a Housing Choice Voucher through the Family Unification Program (FUP).¶

▪

If an applicant is eligible to receive preference, as defined above, then the applicant will be placed at the top of the waiting list. If other applicants on the waiting list have also received priority, then additional applicants receiving priority will be ordered at the top of the waiting list in the order their applications were received. Once all applicants on the waiting list receiving preference are served, applicants who are not prioritized will be contacted.

The FSS program has the primary responsibility to ensure that families are not discriminated against in the selection process. It is the policy of Housing Connect to comply with all Federal, State, and local nondiscrimination laws, the Americans with Disabilities Act and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the ground of race, color, sex, religion, national or ethnic origin, familial status, sexual orientation, gender identity, source of income, or disability. Upon request, Housing Connect's FSS program will provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program. **The FSS program does not discriminate on the basis of race, color, religion, sex, disabilities, familial status or national origin.**

### **Program Orientation**

Before enrolling in the FSS program, all applicants must participate in an FSS program orientation in either a group or individual basis. The orientation will include a review of Housing Connect's FSS program, including discussion of: services offered to program families, participant expectations, an introduction to the FSS escrow account, requirements to complete the FSS program, and the voluntary nature of the FSS program.

### **Incentives to Encourage Participation**

As part of the FSS program, Housing Connect offers incentives to encourage participation and enhance the family's ability to achieve self-sufficiency. Some of these incentives are described below.

Housing Connect will establish an FSS escrow account for each eligible participating family in accordance with HUD guidelines as a financial incentive for program participation. The escrow account section contains detailed information on this program incentive.

~~For Public Housing residents, participation in the Housing Connect FSS program allows self-sufficiency activities to count toward the required community service hours. These activities will be set in the participant's Individual Training and Services Plan (ITSP) and documented hours will be given to the Public Housing property manager on a quarterly basis.~~

Additional incentives include, but are not limited to, access to a variety of referrals for education, job training and employment support, access to free financial management classes and comprehensive credit counseling, access to free credit reports with credit scores from the Experian Credit Bureau, access to GED/HS Diploma preparation services, and GED testing. Participants interested in pursuing homeownership have a wide network of services available that assist with homebuyer education, down payment assistance, mortgage qualification, and realty services. These incentives are contingent on available funding and are therefore subject to change.

### **FSS Activities and Supportive Services**

The activities and supportive services are provided to address barriers that may hinder FSS participants from reaching their goals and increasing their self-sufficiency. The FSS program is responsible for obtaining commitments from public and private entities to ensure the necessary resources are available and accessible. The FSS program also certifies ongoing coordination with the Utah Department of Workforce Services (DWS), as the statewide Workforce Development Board, to ensure access to services and to avoid duplication.

The FSS program currently utilizes the following agencies, organizations, and programs to help participants reach their goals:

Childcare: *Subsidized/affordable childcare.*

Source/Partner: Boys & Girls Club/YMCA, Care About Childcare, Neighborhood House, after-school programs through the School Districts

Crisis Management/Emergency Assistance: *Crisis assessment, intervention, management, resolution.*

Source/Partner: Community Action Program, Crossroads Urban Center, Family Support Center, Housing Retention Program, Juvenile Receiving Center

Education: *Educational assessment and planning, English as a Second Language, adult literacy, GED/HS Diploma, postsecondary education*



Source/Partner: Canyons School District - Entrada Adult High School, eSingleParent, English Skills Learning Center, Granite School District - Granite Peaks, Head Start Program, Jordan School District - Southpointe High School, Kairos Academy, Literacy Action Center, Murray School District Adult Education, Salt Lake County Aging Services, Salt Lake Community College, Salt Lake School District – Horizonte Instruction and Training Center

Employment: *Vocational assessment and planning, basic skills training, career readiness training, Dress for Success, interview skills, job development and placement, On-the-Job training, resume preparation, workplace skills.*

Source/Partner: Assistance League, Department of Workforce Services, LDS Employment Services, People Helping People, Salt Lake Community College's Community Writing Center, State Office of Rehabilitation (Vocational Rehabilitation Program)

Financial Management: *Advocacy, case planning, needs assessment, negotiation.*

Source/Partner: AAA Fair Credit Foundation, Community Development Corporation of Utah, Utah Individual Development Account Network, Utah State University Extension, Volunteer Income Tax Assistance

Health Services: *Alcohol/drug assessment, dental care, family health and nutrition, health screening, medical treatment/primary care, mental health/counseling.*

Source/Partner: Community Health Clinics of Utah, Department of Workforce Services, Family Nutrition Education Program, Medicaid - SNAP Benefit, National Alliance on Mental Health (NAMI) Utah, Salt Lake County Division of Youth Services, Salt Lake Health Department, Take Care Utah, The Children's Center, Utah State University Extension - Food \$ense, Valley Behavioral Health, Women, Infants and Children (WIC)

Homeownership: *Homeownership education, credit repair/building, debt resolution.*

Source/Partner: Community Development Corporation of Utah, NeighborWorks Salt Lake, Salt Lake Valley Habitat for Humanity, Utah State University Extension

Legal Services: *Counsel/advice, document review, debtor's clinic, expungement, Fair Housing, family law.*

Source/Partner: Community Action Program - Landlord/Tenant Mediation Program, Disability Law Center, Legal Aid Society of Salt Lake, Inc., Utah Legal Services, Utah State Bar (Tuesday Night Bar), Utah State Courts' Self Help Center

Life/Parenting Skills Development: *Educational workshops, in-home services, mentoring, referrals.*

Source/Partner: Children's Service Society, Cornerstone Counseling, Department of Child & Family Services, Early Head Start Program, Family Support Center, Help Me Grow Utah, Parents as Teachers Program, Salt Lake County Division of Youth Services, Utah Youth Village

Transportation: *Transportation subsidies, active transportation options, education.*

Source/Partner: Salt Lake Bicycle Collective, Salt Lake County, Utah State University Extension, Utah Transit Authority

The FSS program also uses the referral platform, Untie Us, to ensure that participants are connected to a wide array of services based on their individual needs.

### **Method for Identification of Family Support Needs**

Participants in the FSS program work closely with their FSS case manager to identify family needs in a holistic manner and to develop the Individual Training and Services Plan (ITSP) component of the Contract of Participation. The ITSP identifies the final goals the participant will complete while enrolled in the program and the interim goals and activities that will be required in reaching those goals. During the first meeting with a new FSS participant, the case manager will complete the FSS Initial Needs Assessment. This assessment facilitates the goal setting process between the case manager and participant. The FSS case manager will then assist the participant in setting specific, measurable, attainable, realistic and time-bound (SMART) goals that will guide future actions.

While on the FSS program, participants must work with their FSS case manager to report progress towards their ITSP goals within the assigned timeframes. The FSS case manager will support participants in locating and securing resources in the community to assist in meeting their goals, and will help eliminate barriers to completing the goals whenever possible. The FSS case manager will track this progress with the FSS Progress Report Form.

The Housing Connect FSS program understands that a participant's priorities and goals may change during participation. Therefore, changes to the ITSP may be allowed during the original period of the Contract of Participation. The participant and the FSS case manager must sign any changes to the ITSP, including cancellation of a goal, before they are effective. All proposed changes to a participant's ITSP will be evaluated by the FSS case manager and ~~may be reviewed by the FSS team~~ **must be reviewed by the FSS team in the last year of the participants COP**. Housing Connect FSS program will have the final authority in the approval or denial of a change to an ITSP goal.

The **COP signer head of family** is the only family member required to have an ITSP while on the FSS program, however, other adult household members can choose to work with an FSS case manager to create an ITSP. This secondary ITSP does not have the same employment requirements; however, all goals must be completed within the designated timeframes. The policies regarding changes or cancellation of these goals are the same as listed above.

In accordance with HUD guidelines, **any adult (18 years of age or older), living in the household may sign the FSS Contract of Participation (COP)** ~~the head of family on the FSS Contract of Participation (COP) will always be the same as the head of family for the purposes of housing assistance. Changing the head of family on the housing assistance will automatically change the head of family for all FSS program purposes, including the FSS escrow account. FSS case managers will make every effort to inform the participant about these changes, however, there will be no new COP signed, only a Change in Head of Family Verification will be attached to the original COP as verification of the change.~~

### **FSS Escrow Account**

On a monthly basis, escrow funds are deposited in a single FSS account which is invested in one or more HUD-approved ~~investments~~**investment**. Interest earned from this account will be distributed to participants on a quarterly basis. Each participant will have an individual ledger tracking monthly escrow credits, interest accrued, amount disbursed, and any adjustments. Housing Connect will provide all current FSS participants with an escrow statement with the individual ledger every six months.

~~In accordance with Housing Connect's MTW Plan, the Housing Connect FSS program has adopted a modified FSS savings model in which the participants' escrow earnings are achieved by specific pay points. The Pay Points chart is modeled based on self-sufficiency related goals and Social Determinants of Health. As participants make progress on the FSS program, pay point payments will be placed into the FSS escrow account accordingly.~~

~~\*Insert Pay Points Chart here\*~~

Interim Disbursement of the escrow account:

The Housing Connect FSS program allows participants to receive interim disbursements from their FSS escrow accounts. The following guidelines list the requirements for eligibility to apply for an interim disbursement, the staffing process, and the steps needed to close a disbursement. The FSS team will strive to complete the disbursement process as quickly as possible, but the FSS escrow account should not be viewed as a replacement for an emergency savings account. To be eligible the participant must:

- Have a positive escrow balance.
- Have no open interim disbursements pending.
- Be in good standing with the ~~HCV, PH, PBV and RAD Housing Choice Voucher or Public Housing~~ program(s), and the FSS program, which includes all goals being current.

Eligible participants must complete an Application for Interim Disbursement. This application will demonstrate that the purpose of the disbursement is related to one or more goals in the ITSP and that progress has been made towards that goal(s). The application must include third party documentation of cost. It is recommended that the application also include a current budget based on tracking information.

Complete applications will be reviewed during the weekly FSS staff meeting. The FSS team will review the application to ensure the disbursement is goal related and that progress has been made towards completing the goal. The FSS team reserves the right to request further information or require additional actions before making a decision.

The decision to approve or deny the application is made by consensus of the FSS team. An approved application may include additional stipulations, which must be completed before the interim disbursement is closed.

Interim disbursement checks are made directly to the FSS ~~COP signer-head of family~~. It is each participant's responsibility to submit documentation (e.g. receipts) to their FSS case manager to verify the funds were spent as intended on the Application for Interim Disbursement. Proof of completing the additional steps will also be required, if applicable.

For participants who have earned escrow credits while in both in Public Housing and the Housing Choice Voucher Program, interim disbursements are debited equally from each account until one is fully expended.

Porting the escrow account:

In accordance with HUD policy, there is a single escrow account, which is held by Housing Connect that holds the participant's Housing Choice Voucher. The policies detailing the use of the escrow are set in the Action Plan of Housing Connect that holds the participant's FSS Contract of Participation.

Final Disbursement of the escrow account:

Final disbursement of the FSS escrow account will be made to the **FSS Contract of Participation signer** ~~head of family~~ when the Contract of Participation is completed and verification provided that no one in the household is receiving welfare, as defined by FSS guidelines (see Contract Completion section below for more information and the Housing Connect FSS program's definition of welfare.)¶

~~The Final Disbursement check will be made payable to the current FSS Contract of Participation signer head of family receiving the housing assistance.~~ There are no requirements or stipulations on the participant's use of the final disbursement funds.

Any outstanding debt owed by the participant to Housing Connect will be debited from the escrow account before the final escrow disbursement.

Forfeiting of the escrow account:

If the FSS Contract of Participation is terminated, the balance of the participant's FSS escrow account will be forfeited. **In accordance with HUD guidelines, an exception to this rule applies when:**

- Services that the PHA or owner and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable
- The COP signer becomes permanently disabled and unable to work during the period of the contract, unless the PHA and the FSS family determine that it is possible to modify the contract and designate a new COP signer
- An FSS family in good standing moves outside of the jurisdiction of the PHA (in accordance with portability requirements) for good cause, as determine by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

~~in accordance with HUD guidelines.¶~~

### **Contract Completion**

In order to complete the FSS program, the family must **fulfill** ~~meet one of the following sets of~~ criteria:¶

● ~~The family has fulfilled all of its responsibilities under the contract. These responsibilities include:~~

- Seek, obtain, and maintain suitable employment as defined by the PHA and FSS family in the ITSP
- Completion of all goals on the ITSP
- Be in good standing with HCV, PH, PBV or RAD and housing landlord or property manager
- Welfare free at the time of graduation

To demonstrate this and obtain the balance from their FSS escrow account, the Contract of Participation signer ~~head of the family~~ will submit the Final Disbursement Application to the FSS Team for approval. The application includes:

- o Employment Verification
- o Department of Workforce Services Certification
- o Verification of completion of goals
- o Landlord Statement

~~● Thirty percent of the family's monthly adjusted income equals or is greater than the Fair Market Rent amount for the unit size for which the family qualifies. When this occurs, the family has successfully completed the FSS program. In order to obtain the balance of their FSS escrow account, the head of family must submit the Final Disbursement Application to the FSS Team for approval. The application includes:~~

- ~~o Department of Workforce Services Certification~~

Definitions:

**Seek:** The Housing Connect FSS program defines “seek” as applying for employment, attending job interviews, and otherwise following through on employment opportunities as it is set on the participant’s ITSP. The ITSP will define the resources used, a timeframe for activities, and how often the participant will be reporting their progress. Written or oral reporting is acceptable.

**Suitable:** The Housing Connect FSS program defines “suitable” employment as a lawful activity that is based on the skills, education, and job training of the participant and is based on the available job opportunities in the area. Suitable employment will be further defined

according to the participant's ITSP. The ITSP will define pay rate, hours, job field and will be evaluated on an annual basis.

**Welfare:** HUD defines welfare specifically for the FSS program in their guiding documents. It is defined as income assistance from Federal or State welfare programs, and includes only cash maintenance payments designed to meet a family's ongoing basic needs. As clarified in PIH Notice 2007-20, "child only" or "non-needy" TANF grants "do not qualify as welfare assistance under FSS regulations."

Participants that successfully complete the FSS program may receive transitional services if the ~~Contract of Participation signer~~ ~~head of family~~ maintains employment. The supportive services offered may be used to help families move toward, or maintain, self-sufficiency.

### **Contract Extensions**

The initial term of the FSS Contract of Participation is five years ~~from the execution date (date of last reexamination)~~, but in rare circumstances, the contract may be extended for up to two additional years. Requests for an extension of the contract will be evaluated to see if "good cause" exists for granting an extension. In general, "good cause" means ~~the following~~:

- a circumstance beyond the family's control that directly prevents the participant from meeting the obligations of the contract, ~~as determined by the PHA or owner~~. Such causes may include: serious illness or injury in the immediate family, and/or involuntary loss of employment.
- ~~Active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension (example: completion of a degree in which the participant is unemployed, credit repair towards homeownership, etc.) as determined by the PHA or owner~~

~~An extension may also be granted to allow the family to meet the interim goal of remaining off welfare (as defined above) for the final 12 months of the contract. Extensions will not be granted for loss of employment due to the lack of performance on the part of the FSS participant.~~

All requests for extension must be submitted prior to ~~the~~ expiration ~~date~~ of the Contract of Participation by completing the Extension Request Form. Participants will be notified in writing within ten business days of Housing Connect's decision and may request an informal hearing if they disagree with the decision (see Grievance Procedures section for additional information).



A participant granted an extension is not able to make changes to the ITSP during the extension period. In order to complete the Contract of Participation successfully, the uncompleted goals listed on the Extension Request Form must be completed during the extension period.

### **Contract Non-compliance and Corrective Actions**

Housing Connect FSS program reserves the right to take corrective actions if a participant fails to meet program obligations. The FSS program may withhold supportive services for the family or terminate the Contract of Participation. For most HCV FSS participants, Housing Connect will not terminate HCV assistance for failure to comply with, or complete, the FSS Contract of Participation. Termination of HCV assistance would **only** apply to Family Unification Program (FUP) Youth voucher holders who have exceeded the initial 36 months of housing assistance. **FUP youth that are active FSS participants may extend their FSS Participation up to 60 months. Termination from the FSS program withdraws the FUP Youth voucher holder from the 60-month rule.**

Any participant determined to be out of compliance with the Contract of Participation will be notified of the violation(s). The case manager will informally attempt to find resolution so the family is in compliance. If non-compliance continues, the case manager will mail the participant a Final Notice describing what action(s) is needed to avoid contract termination and the date by which it must be taken. Two copies of the notice will be mailed; one first class letter, the other as a certified letter. In the event that the participant does not comply with the actions outlined in the Final Notice, the Contract of Participation will be terminated.

### **Contract Termination**

The Contract of Participation with the FSS program may be terminated under the following circumstances:

- If the family withdraws from the FSS program.
- Mutual consent of both parties (Housing Connect FSS program & the **Contract of Participation signer head of family**).
- The failure of the FSS family to meet its obligations under the Contract of Participation without “good cause”. The FSS team will determine if there is “good cause” for not meeting the contract obligations. In general, “good cause” means a circumstance beyond the family’s control that directly prevents the participant from meeting the obligations of the contract. **An extension will be offered if the FSS team determines “good cause”.**



- If a participant fails to report progress to their FSS case manager in a timely manner. ~~After~~~~if~~~~after~~ four months without contact, the FSS case manager may begin the termination process outlined above.
- If an act occurs that is inconsistent with the purpose of the FSS program. This may include, but is not limited to; inaccurate or deceptive reporting of progress toward goals, submission of false or fraudulent documents, or withholding information required for program operation.
- If the participant's housing assistance is terminated.
- HCV FSS Participants: If the participant ports their voucher to another jurisdiction and the voucher is absorbed, or if the family enters into an FSS Contract of Participation in their new jurisdiction, the Housing Connect FSS Contract of Participation will be terminated. (See Housing Choice Voucher Portability and FSS Participation for more details.)

When the Contract of Participation is terminated **without an escrow disbursement:**

- All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. (Exception: please see the Housing Choice Voucher Portability and FSS Participation section for more information on how a participant's escrow may be held by Housing Connect if the participant ports their FSS contract but their voucher is not absorbed by the receiving housing authority.) Forfeited escrow will go into a **seperate** account to be used for the benefit of FSS families. This includes the following:

- Transportation
- Child Care
- Training for the participant
- **Testing fees**
- Employment ~~prep costs~~~~expenses~~
- Other costs related to achieving their CoP obligations
- Training for FSS ~~Coordinator(s)~~~~case managers~~
- **Other eligible activities as determined by the secretary**

- The participant will receive a written notice stating the reason for the termination of the FSS Contract of Participation. If termination is based on a decision of the FSS program, the notice will include notice of the right to request a hearing according to grievance procedures.

- For FUP Youth participating in ~~FSS~~~~the FUP/FSS Demonstration~~, ~~termination of the FSS Contract will end participation in the Demonstration, if~~. If the initial 36 months of housing subsidy has been used, then the FUP HCV will also be terminated.

Termination from the Housing Connect FSS program for any reason does not preclude a participant from future participation in Housing Connect 's FSS program.

### **Housing Choice Voucher Portability and FSS Participation**

If a HCV family elects to exercise portability of their housing voucher, the Housing Connect FSS program will attempt to accommodate participation in the FSS program. FSS Portability requires that there be only one escrow account and one Contract of Participation. The Action Plan of the housing authority that holds the current Contract of Participation will guide the family's participation in the FSS program. The Housing Connect FSS program waives the requirement that a family participate on Housing Connect's FSS program for a year.

Definitions:

**Portability** is an option that eligible Housing Choice Voucher (HCV) holders may utilize in order to move to another jurisdiction with continued assistance through tenant-based Housing Choice Voucher program.

- The housing authority that issues the voucher is referred to as the **initial housing authority (IHA)**.
- The housing authority that has jurisdiction in the area to which the family wants to move is referred to as the **receiving housing authority (RHA)**.
- When a housing authority **absorbs** a housing voucher, that housing authority takes on full financial responsibility and management for the incoming (or already moved) household.
- When a housing authority **administers** or "bills" for a voucher, the housing authority from which the tenant moved (IHA) remains financially responsible for the tenant, although their voucher is administered locally by the housing authority (RHA) in their new location.

Port-Out to a receiving housing authority with a FSS Program:

- If the receiving housing authority accepts the participant into their FSS program and fully absorbs the resident into their housing authority, Housing Connect will transfer the FSS Contract of Participation, ITSP, and escrow balance to the receiving housing

authority. If the participant is not transferred within 60-days of the port-out, Housing Connect may terminate the FSS Contract of Participation and any escrow funds accrued will be forfeited in accordance with HUD guidelines and procedures.

- If the receiving housing authority accepts the participant into their FSS program, but only administers the voucher, Housing Connect will continue to maintain the participant's FSS escrow account.
- If the receiving housing authority does not accept the participant into their FSS program, but administers the voucher, the participant may continue working with Housing Connect's FSS program, if that participant can demonstrate with satisfaction that they are able to fulfill their responsibilities under the contract. If the family remains in Housing Connect's FSS program, the existing contract remains in effect, and Housing Connect will monitor the family's progress.
- If the receiving housing authority absorbs the voucher, but the participant fails to enroll in their FSS program within 60-days of the port-out, Housing Connect will end the FSS Contract of Participation and any escrow funds accrued will be forfeited in accordance with HUD guidelines and procedures.

#### Port-Out to a receiving housing authority without a FSS Program:

- If the receiving housing authority only administers the voucher, the participant may continue in Housing Connect's FSS program, if that participant can demonstrate with satisfaction that they are able to fulfill their responsibilities under the contract. If the family remains in Housing Connect's FSS program, the existing contract remains in effect, and Housing Connect will monitor the family's progress.
- If the receiving housing authority absorbs the voucher, Housing Connect will end the FSS Contract of Participation and any funds accrued will be forfeited in accordance with HUD guidelines and procedures.

#### Port-Ins to Housing Connect from another housing authority:

- Current FSS participants who exercise their right to portability into Housing Connect's jurisdiction will be given preference on Housing Connect's FSS program waiting list. If the participant enrolls in Housing Connect's FSS program, a new Contract of Participation will be executed for the term of the remaining contract. The new contract start date will be the first day of the month after the new contract is signed. The end date of the contract and the baseline figures from the initial contract will remain the same.

- If Housing Connect only administers the housing voucher, but does not absorb the FSS participant into their Housing Choice Voucher program, Housing Connect will allow the participant to enroll in the FSS program and will execute a new Contract of Participation with the participant if the initial housing authority is able and willing to maintain the FSS escrow account.

## **Grievance Procedures**

The Housing Connect FSS program will make efforts to resolve all grievances of FSS participants in accordance with the policies outlined in this Action Plan, current HUD regulations for the HCV, PH, RAD, PBV and FSS programs, Housing Connect's current Administrative Plan and Housing Connect's current Admissions & Continued Occupancy Policy of the Public Housing Program.

In the event that a grievance is not resolved, an FSS program participant can file a formal grievance by submitting an FSS Grievance Form to any Housing Connect employee. The department director will review the form within 2-business days and provide a written response via mail and email within 30-days of the initial submission. ~~Participants may request a copy of their FSS file in writing.~~

In addition, CoP holders have the right to access to their FSS file at any time. To access, they must make the request in writing to the FSS Coordinator. After the request is received, the participant is informed to allow up to three business days for access and sign a statement that they were provided with their records. Paper printouts of the records or an electronic version via secure email will be provided based on the participants preference.