

Chapter 18 FAMILY SELF-SUFFICIENCY (FSS) PROGRAM Introduction

In 1984, the Department of Housing and Urban Development (HUD) developed a demonstration known as Project Self-Sufficiency within the Housing Authority of the City of Abilene's (AHA) Section 8 Rental Assistance Program. This program was limited to single parents with "Section 8 Certificates" only.

The follow-up program was Operation Bootstrap; designed for two-parent families and all current "Section 8 Certificate" holders.

Both programs, of course, were designed to move low-income families receiving housing assistance up and into the economic mainstream.

Now, we have the refiner and enhancement of both programs—The Family Self-Sufficiency Program (FSS). The FSS program is designed to give people a "hand-up" instead of a "hand-out." This design promotes and encourages participants to become empowered and to affirm and to accomplish goals that will enable them to become economically self-sufficient.

By providing case management and/or coordinating with other agencies, the FSS program participants are able to accomplish goals and achieve economic independence.

This chapter describes how the PHA will administer the FSS Program.

PART I: FAMILY DEMOGRAPHICS

The primary target population for the FSS program will be the participants of the Housing Choice Voucher Program (HCV).

PART II. ESTIMATE OF PARTICIPANT FAMILIES

Eighty (80) eligible FSS families can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated federal, tribal, state, local, and private resources.

PART III. FSS FAMILY SELECTION PROCESS

Families are not eligible for the FSS Program until after their lease is effective and they are receiving housing assistance. “Eligible families” is defined as current HCV Program participants.

A family will not be eligible if it has previously successfully completed the FSS Program. A family that has previously been enrolled in the FSS Program, but did not successfully complete it, may be allowed to enroll only one additional time. After a family has enrolled and been terminated from the FSS Program twice, that family will no longer be considered an eligible family.

If an eligible family decides not to participate in the FSS Program, they will not be denied admission to the HCV Program or lose their current rental assistance.

Selections will be made regardless of race, color, religion, sex, handicap, familial status, or national origin—but the following qualifications must be met:

- A. Sign a five-year Contract of Participation (HUD-Form 52650) with the AHA. This form states the responsibilities of a participating family, including conditions and causes for termination from the FSS Program.
- B. Families must comply with the terms of their lease.
- C. The family must comply with the family obligations under the HCV Program and live in the jurisdiction of the AHA, unless the family ports in from another jurisdiction.
- D. If the family head of household or any member of the family has been convicted of use or possession or distribution of a controlled substance within the past three years of the application date, assistance will be denied.

PART IV. PROGRAM WAITING LIST

The FSS Program may have a waiting list of interested, eligible families. The AHA will use the following priority list to admit eligible families from the waiting list onto the FSS Program:

- A. FSS Participants that have ported in from another jurisdiction. The AHA will use the effective date of the port in to determine priority within this category.
- B. Any current eligible family that has filled out an FSS Program application. The AHA will date and time stamp all applications and select the oldest application first in this priority level.

PART V. INCENTIVES TO ENCOURAGE PARTICIPATION

In order to encourage participation on the FSS Program, the AHA will establish an escrow account in accordance to HUD policy. If available, the AHA may use emergency or transitional funds to assist participants.

- A. The FSS escrow account shall be established for all participants on the AHA FSS Program. All FSS account funds will be deposited into one or more HUD approved investments. Payment of these funds will be made to the head of FSS family upon successful fulfillment of the family responsibilities of the contract of participation.

In the case of a participant having “home ownership” as a final goal in their ITSP, and the actual closing of a home purchase being the only factor that restricts that family from achieving that goal, the AHA may release the escrow account at the closing of home sale, if the AHA is provided the appropriate security deed and other applicable bank documents.

- B. The PHA will review each request for interim disbursement. The participant will first seek assistance in the community for participants need. If no service is available the PHA will consider the ability to use the forfeit escrow account and the individual escrow account as a last resort. If the service is unavailable in the community, the participant must show proof from that agency that the funds or resources are unavailable at that time. At PHAs discretion they may consider allowing interim disbursement only for final goals prior to graduation. This participant must be in good standings with the PHA.

PART VI. OUTREACH EFFORTS

In order to promote the FSS Program, the AHA may utilize the following methods for outreach within the HCV Program:

- A. The FSS coordinator will make an FSS Program presentation at HCV voucher briefings. The FSS coordinator will make promotional materials available; items such as handouts, business cards or brochures will be utilized.
- B. Housing counselors will remind current HCV participants about the presence of the FSS program at annual reexaminations. Housing counselors will refer an interested participant to the FSS coordinator for additional details or provide the participant with an FSS Program application.
- C. The AHA will dedicate a portion of its website, www.abileneha.org, to the promotion of the FSS program. This portion of the website will contain information about the program and contact information for the FSS coordinator.

PART VII. FSS ACTIVITIES AND SUPPORTIVE SERVICES

The FSS coordinator will attain information about services provided by various local and national agencies that have the ability to assist FSS participants. Services that will be sought include, but will not be limited to:

- A. Local Colleges and Universities
 - 1. Scholarship and financial aid opportunities
 - 2. Guidance in planning required coursework
 - 3. Assist in job placement
- B. Local Child Care Providers
 - 1. Provide childcare slots (if available)
 - 2. Provide scholarship opportunities (if available)
- C. State or Local Rehabilitation Organizations
 - 1. Provide medical, psychological, and vocational evaluation
 - 2. Provide counseling to families with handicapped participants
 - 3. Provide medical treatment or rehabilitation services
 - 4. Provide information about funds for training in trade and work skills
 - 5. Assist with job placement
- D. State Workforce Agencies
 - 1. Assist with job placement
 - 2. Provide employment readiness counseling
 - 3. Provide job development
 - 4. Provide job search seminar information

5. Provide job market and labor market information

The AHA will also use the Basic Needs Network as the Program Coordinating Committee (PCC). The AHA will select a willing FSS participant to serve on that committee in order to satisfy HUD's guidelines for a PCC.

PART VIII. METHOD FOR IDENTIFICATION OF FAMILY SUPPORT NEEDS

In order to assess the needs of FSS participants, the AHA will use the following process to complete the Individual Training and Service Plan (ITSP). The ITSP can be modified as often as the AHA and the family deem necessary during the course of the COP, with the exception that the ITSP cannot be modified within the final 12 consecutive months of the COP.

A. The family must provide participant identifying work history, prior education, and the support services the participant feels they need. The participant should also identify their individual strengths and weaknesses. The participant must also provide the AHA with their final goals for the ITSP.

B. Through interviews with the participant, the AHA will determine the following:

1. Primary need of the participant and identify the appropriate agency to assist that need.
2. A clear understanding of the participant's circumstances so that case information can be evaluated and verified.
3. Participant's knowledge of area resources and agencies.
4. The goals of the participant. The AHA and the participant will work together to determine interim goals in time frames for completion of those interim goals.

C. The participant must complete the activities within the dates listed in each ITSP.

D. The participant must sign the COP. The COP can only be signed by the AHA and the head of FSS family.

PART IX. CONTRACT EXTENSION POLICY

Every COP is originally executed for five years. Some participants may complete their participation before the five-year period ends. However, some participants may need more than five years to successfully complete the FSS Program. A COP may be extended for a period not exceeding two years from original ending date of the COP. For purposes of the PHA FSS program, good cause includes circumstances beyond the control of the FSS family:

A. Family circumstances

B. Community circumstances

C. Active pursuit of a current or additional self-sufficiency goal

PART X. PROGRAM TERMINATION, WITHHOLDING OF SERVICES AND AVAILABLE GRIEVANCE PROCEDURES

A description of the AHA's policies for termination and/or withholding of housing assistance and supportive services will be in compliance with the procedures specified under CFR 984.303(b)(5).

The AHA will give the participant written notice of its decision to terminate or deny assistance. Notice shall be given to participant within five working days of the AHA's decision, briefly stating the reasons for the decisions.

The COP is automatically terminated if the family's HCV assistance is terminated in accordance to HUD requirements. The COP may also be terminated before the expiration of the COP by:

- A. Mutual consent of the AHA and the participant
- B. The AHA determines that the participant has not fulfilled its responsibilities under the COP
- C. The participant's withdrawal from the FSS program
- D. An act that occurs that is inconsistent with the purpose of the FSS Program
- E. The AHA may declare the COP null and void if the resources and services necessary to complete the COP are not available.
- F. The participant has failed to comply without good cause with the COP and/or the interim goals in the ITSP. In keeping with the hearing procedures provided in 24 CFR 982.555, the AHA will make the determination if the participant has failed to comply with the COP and/or the ITSP without good cause.
- G. The participant committing fraud (based on HUD's definition of fraud)

The AHA will utilize the Informal Reviews and Hearings Procedure as laid out in the most recent version of the Abilene Housing Authority's Administrative Plan.

PART XI. ASSURANCE OF NON-INTERFERENCE WITH RIGHTS OF NON- PARTICIPATING FAMILIES

If an eligible family decides not to become a participant in the FSS Program, they are assured that they will not be terminated from the HCV Program based on that decision.

PART XII. TIMETABLE FOR PROGRAM IMPLEMENTATION

The AHA FSS Program was implemented in 1993 and is an on-going program of the AHA.

PART XIII. ESCROW ACCOUNTS

A. All escrow accounts shall be handled in the manner deemed acceptable according to HUD Rules and Regulations as stated within the following documents: COP, FSS Escrow Credit Worksheet, HUD HCV Guidebook, AHA FSS Action Plan, and any related new HUD mandate.

B. Interim Withdrawals--The AHA will review each request for interim disbursement. The participant will first seek assistance in the community for participants needs. If no service is available the PHA will consider the ability to use.

C. Disbursement of Escrow Account Funds—all participants that have successfully completed the FSS program are eligible to receive their escrow payment. The escrow payment will be the amount deposited into the account of the participant's behalf, plus any interest, less any monies owed to the AHA once verification has been obtained that no family member is receiving cash assistance.

D. Forfeited Escrow Monies—all escrow monies forfeited by the participant due to a COP termination and/or fraud committed by the participant shall be placed back into Section 8 FSS funds account maintained by the AHA.

E. Escrow Account Reporting—all participants who have any amount of monies deposited into escrow account on their behalf shall receive a report of the amount, including any interest earned at least once per year. The AHA will retain accurate records of escrow account and all deposits, withdraws, and interest earned, forfeited amounts and disbursements for each client.

PART XIV. PORTABILITY OF FSS CONTRACT AND ESCROW ACCOUNT

A Housing Choice Voucher FSS participant is eligible to exercise portability per the policies of the AHA's Housing Choice Voucher Administrative Plan, of which the family must comply with such obligations under the HCV program, by living in the jurisdiction of the PHA that enrolled the family in the FSS program at least 12 months from the effective date of the contract.

A. A Housing Choice Voucher FSS participant is eligible to exercise portability per policies of the AHA Housing Choice Voucher Administrative Plan.

- B. If a participant moves out of the AHA jurisdiction and is accepted and absorbed into the receiving PHA's FSS program, any escrow account will be transferred to the receiving housing agency. A receiving PHA is not required to accept an AHA relocating FSS family into its FSS Program.
- C. If the participant moves out of the AHA jurisdiction and is administered by the receiving housing agency, the escrow account will be maintained by the AHA. Cooperation of the receiving PHA is needed to confirm accuracy of deposits AHA would make in the escrow account.
- D. A relocating FSS family may continue in AHA's FSS program if the family demonstrates they can fulfill their FSS responsibility under the existing FSS contract. This must be demonstrated to the satisfaction of the AHA.
- E. A FSS participant porting into the AHA jurisdiction will be absorbed and may be accepted into AHA's FSS program if adequate resources are available. A new FSS Contract of Participation will be executed for the term of the remaining contract. The new contract start date will be the effective date of the new lease in the AHA's jurisdiction. The end date of the contract must be the same expiration date of the contract between the initial housing authority and the participant.

PART XV. OPTIONAL INFORMATION

- A. Designation of units by bedroom size is dependent on funding.
- B. Presently, the FSS Program is for HCV participants only.
- C. The AHA will report to HUD, upon their request and on the HUD approved form, the following:
 - 1. Description of activities carried out under the FSS program
 - 2. Description of the effectiveness of the FSS program in assisting families to achieve economic self-sufficiency.
 - 3. Description of the effectiveness of the FSS program in coordinating resources of the community to assist families in achieving economic independence and self-sufficiency.
- D. PIH Notice 2007-20

“HUD has determined that child-only or non-needy TANF grants made to and or on behalf of a dependent child solely on the basis of the child's need and not on the need of the child's current non-parental caretaker do not qualify as welfare assistance under the FSS regulations because such grants are not designed to meet the ‘family's ongoing basic needs.’”