

Davis Community Housing Authority Family Self-Sufficiency Program Action Plan

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Introduction

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by Davis Community Housing Authority (DCHA).

The purpose of the FSS program is to promote the development of local strategies to coordinate the use of HUD assistance with public and private resources in order to enable eligible families to make progress toward economic security.

The purpose of the FSS Action Plan is to establish policies and procedures for carrying out the FSS program in a manner consistent with HUD requirements and local objectives. It is available for public review via DCHA's website.

This FSS Action Plan describes the DCHA local policies for operation of the FSS program in the context of federal laws and regulations. The FSS program will be operated in accordance with applicable laws, regulations, notices and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.

The FSS program and the functions and responsibilities of PHA staff are consistent with the DCHA personnel policy and Agency plan.

Overview of the Family Self-Sufficiency Program

The purpose of the DCHA FSS program is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. The purpose and basic requirements of the FSS program are further elaborated upon in Chapter 2.

DCHA seeks to help families make progress toward economic security by supporting the family's effort to:

- Increase their earned income
- Build financial capability
- Achieve their financial goals

Applicable Regulations

Applicable regulations for Section 8 FSS programs include:

24 CFR Part 5: General Program Requirements

24 CFR Part 8: Nondiscrimination

24 CFR Part 945: Designated Housing

24 CFR Part 965: PHA-Owned or Leased Projects—General Provisions

24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program

24 CFR Part 984: Section 8 and Public Housing Family Self-Sufficiency Program

HUD Approach to Policy Development

In developing this policy, there are two distinct areas of policy:

Mandatory policies are those driven by legislation, regulations, current handbooks, notices, and legal opinions.

Discretionary policies consist of those developed for areas in which the PHA has regulatory discretion, or regarding optional, nonbinding guidance including guidebooks, notices that have expired, and recommendations from individual HUD staff.

HUD expects PHAs to develop policies and procedures that are consistent with mandatory regulations and to make clear the optional policies the PHA has adopted. The PHA's FSS action plan is the foundation of those policies and procedures for the FSS program. HUD's directions require PHAs to make policy choices that provide guidance to staff and consistency to program applicants and participants.

DCHA will review and update the action plan at least once a year to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

Family Demographics [24 CFR 984.201(d)(1)]

These tables describe the demographics of the population expected to be served by the DCHA Action Plan.

The FSS program will serve the following housing assistance programs:

- Public Housing,
- Housing Choice Vouchers (HCV): Tenant-Based Vouchers
- Housing Choice Vouchers (HCV): HCV Homeownership
- Housing Choice Vouchers (HCV): Project-Based Vouchers
- Housing Choice Vouchers (HCV): Other special purpose vouchers
- Section 8 Moderate Rehabilitation
- Project-Based Rental Assistance (PBRA)

DCHA will consider adding programs as they are made available and/or additional funding is available.

As part of the required contents of the FSS action plan, family demographics of the Section 8 participants serve to provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants). These data may later be used to help the housing authority and the program coordinating committee (PCC) to identify supportive service needs of the families expected to participate in the FSS program.

DCHA has used ten years of FSS participation data in order to project FSS participation with a comparison of HCV household demographics.

Section 8	Percent of Total	FSS Projection
HOH		
Female HOH	75%	89%
Male HOH	25%	11%
Race		
White, Hispanic	14%	17%
White, Non-Hispanic	74%	66%
Black/African American, Hispanic	>1%	0%
Black/African American, Non-Hispanic	6%	7%
American Indian/Alaska Native, Hispanic	>1%	0%
American Indian/Alaska Native, Non-Hispanic	1%	1%
Asian, Hispanic	0%	0%
Asian, Non-Hispanic	>1%	1%
Native Hawaiian/Other Pacific Islander, Hispanic	>1%	1%
Native Hawaiian/Other Pacific Islander, Non-Hispanic	1%	3%
2 or more selected, Hispanic	>1%	0%
2 or more selected, Non-Hispanic	4%	4%
Age of Head of Household*		
18-24	1%	8%
25-34	11%	46%
35-44	26%	32%
45-54	22%	13%
55-64	19%	1%
65+	21%	0%

*With the Final Rule allowing the household to establish the FSS Head of Household, the age of participation is anticipated to change. Due to the employment requirement for graduation, DCHA has historically found higher interest in the program by individuals between the ages of 25 to 44.

Supportive Services Needs of Families Expected to Participate in FSS

The following is a list of the supportive service needs of the families expected to enroll in the DCHA FSS program. Additional details are found in Chapter 4. This list is based on experience with past FSS participants and input from the PCC.

- Childcare
- Crisis Management/Emergency Assistance

- Education
- Employment
- Financial Management
- Health Services
- Homeownership
- Life/Parenting Skills Development
- Transportation

Estimate of Participating Families

Over time, DCHA hopes to serve all families who are interested in participating in the FSS program. The number of spaces available in the program at any given time, however, will be limited by the program's resources, including the number of FSS coordinators funded to work with FSS participants. New families will be admitted to the FSS program as space permits.

In recent years, DCHA has been funded for one coordinator. The minimum number of participants required to be served based on this funding is 25.

Historically, DCHA's FSS program has enrolled eight new families into the FSS program each year. Accordingly, DCHA expects to be able to provide FSS Services to 80 families over a five-year period.

Other Self-Sufficiency Programs

No families from other self-sufficiency programs are expected to enroll in the FSS program.

Timetable for Implementation

DCHA implemented its FSS Program in 1994 and will continue to implement it per this FSS Action Plan.

Family Selection Procedures

Waiting List

The PHA may use either of the following to select among applicants on the FSS waiting list with the same preference status [24 CFR 984.203(b)]:

Date and time of application to the FSS program; or
A drawing or other random choice technique.

DCHA will use the date the family expressed an interest in participating in the FSS program to fill the FSS slots.

Admission Preferences

As part of the process for selecting families for participation in the FSS program, the PHA may choose whether to employ the use of preferences.

DCHA has not adopted any admissions preferences. Families will be selected based on the date the family expressed an interest in participating in the FSS program.

Screening for Motivation

DCHA will not use any motivational screening factors to measure a family's interest and motivation to participate in the FSS program. It is anticipated that the use of motivational screening could present unnecessary barriers.

Compliance with Nondiscrimination Policies

It is the policy of DCHA to comply with all Federal, State, and local nondiscrimination laws and regulations, including but not limited to the Fair Housing Act, the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. 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 grounds of race, color, sex, religion, national or ethnic origin, family status, source of income, disability or perceived gender identity and sexual orientation. In addition, DCHA's FSS staff will, upon request, provide reasonable accommodations to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).

The FSS program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS coordinators will review the file in the staff review meeting to ensure that non-selection is not based on discriminatory factors before the final decision is made. Applicants will be notified in writing of the reason(s) they were not selected for participation and will have the opportunity to appeal the decision (see Hearing Procedures). At all times, DCHA will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

Re-Enrollment of Prior FSS Participants

The following previous FSS families will be allowed to re-enroll in DCHA's FSS program:

- FSS program graduates (minimum of two years since graduation)
- FSS participants who have withdrawn voluntarily (minimum one year since exit)
- Families terminated with escrow disbursement (minimum of two years since exit)
- Families involuntarily terminated (minimum one year since exit)
- Family members who were not Heads of FSS Family previously

Head of FSS Family

Each eligible family that is selected to participate in an FSS program must enter a contract of participation with the PHA. There will be no more than one contract at any time for each family. There may be an ITSP for as many members of the family who wish to participate. The contract shall be signed by a representative of the PHA and the head of FSS family, as designated by the

family. This head of FSS family does not have to be the same as the official head of household for rental assistance purposes [24 CFR 984.303(a)].

DCHA will meet with the family and detail the obligations, rights, and privileges that pertain to the FSS head of household and require each adult family member to certify their agreement as to their designated head of the FSS family. These certifications will be a permanent part of the FSS family's record and will be updated with each change of head of household.

Upon request, DCHA will consult with families on this decision but it is the assisted household that chooses the head of FSS family that is most suitable for their individual household circumstances.

The designation and any changes by the household to the Head of FSS Family must be submitted to DCHA in writing with all adult members of the household signing the request.

Outreach

DCHA will conduct widespread outreach to encourage enrollment in the FSS program. Interpreters will be used as needed and clients may contact staff to express interest in person, phone or by email. Outreach efforts will include the activities below:

Location/Activity	Details
Providing information during Interims/Recertifications	Housing specialists have copies of the application and are able to direct questions to FSS Coordinator
Posting information on DCHA website	Updated on an as needed basis
Lobby handouts	Flyers inserted into booklets from Consumer Protection Finance Bureau explaining the program
Providing information about the FSS program to eligible families by mail	Mass mailings with informational letters and applications

Outreach informational material about the FSS Program will include information about:

- Program overview
- Program benefits
- Available resources
- Participant responsibilities
- Program outcomes

Outreach efforts will be targeted equally to all families, using materials in both English and other commonly spoken languages to ensure that non-English and limited English-speaking families receive information and have the opportunity to participate in the FSS Program. In

conducting outreach, DCHA will account for the needs of person with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible who wish to participate are able to do so.

The FSS Coordinator will conduct mass mailings at any time the FSS waiting list has been reduced to one, in order to ensure that when there are openings they are able to be filled promptly.

FSS Escrow Account and Other Incentives for Participants

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS account, as well as any additional incentives offered by DCHA are described below.

Incentive	Provided By	Description
FSS escrow account	DCHA	Management and investment
Case management/Coaching	FSS Coordinator	Quarterly meetings with participants to establish current needs and progress
Information and referrals to services	FSS Coordinator	In partnership with PCC and other regional groups

Additional Incentives

While DCHA's FSS program does not provide any other financial incentives for FSS participants, it does provide coaching services, as well as referrals to other service providers, that can be very valuable for FSS program participants.

Interim Disbursements

The PHA may at its sole option disburse FSS account funds before completion of the contract if the family needs a portion of the funds for purposes consistent with the contract of participation and the PHA determines that the FSS family has fulfilled certain interim goals established in the contract of participation. These interim disbursements could include using the funds to assist the family in meeting expenses related to completion of higher education (e.g., college, graduate school) or job training, or to meet start-up expenses involved in creation of a small business [24 984.305(c)(2)(ii)].

DCHA will disburse a portion of the FSS escrow account funds before completion of the CoP when the family has met certain interim goals, which means the family has met all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date, and requested funds are needed to complete an interim goal or task within the CoP and are not ongoing expenses.

A determination of whether the family qualifies for the requested interim disbursement will be made on a case-by-case basis by the FSS Coordinator and an administrative staff representative of DCHA. The FSS coordinator will first explore options for services and in-kind donations from

partners, which must be exhausted before a request for an interim disbursement will be approved.

Forfeited FSS Escrow Funds

Forfeited FSS escrow funds may be deployed any time during the term of a household's CoP. The use of forfeited funds may be requested by DCHA or the Head of the FSS Family in writing or verbally. The FSS Coordinator will review requests to evaluate whether the request is allowed within this policy and will request final approval from the Executive Director.

DCHA will use forfeited escrow accounts for support and other costs for FSS participants in good standing when funds requested are needed to complete an interim goal or task in the ITSP and are not ongoing expenses.

DCHA will use forfeited escrow accounts for training provided to FSS Coordinators.

The PHA will define *supports* as defined in 24 CFR 984.305(f)(2)(i)(A) as training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s).

The PHA will define *necessary to complete* as meaning that no other resources are available in the community either because such a resource is non-existent or that resources are utilized above capacity and agencies cannot, for an indetermined period, provide such a resource.

The PHA will provide funds from the forfeited escrow account to FSS participants in good standing before requiring the participant to use an "interim" disbursement from their current escrow account so long as the funds requested are needed to complete an interim goal or task within the CoP and are not ongoing expenses.

The PHA will prioritize requests for funds from forfeited escrow accounts initially on a first come first served basis based on the date and time of the request. After that order is established, the PHA will apply the following priorities:

Priority 1: Funds to meet a goal in the ITSP that is necessary to ensure the safety and wellbeing of victims of domestic violence, dating violence, sexual assault, and stalking as defined in the PHA's Section 8 Administrative Plan regarding VAWA.

Priority 2: Funds to meet a goal in the ITSP that is necessary to stabilize health, safety, and welfare of the FSS participant or family that if left unattended would jeopardize education, training, or employment.

Family Activities and Supportive Services

Once families are admitted to the FSS program, the PHA becomes responsible for making sure these families are adequately served. The purpose of the family self-sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of Section 8 and public housing assistance programs with public and private resources, to enable families eligible to

receive assistance under these programs to achieve economic independence and self-sufficiency. As such, upon selection, families are matched with the appropriate activities and supportive services so that they may obtain the education, employment, and business and social skills necessary to achieve self-sufficiency. This is a vital element of the FSS program. The PHA must make a good faith effort to replace the obtained services from another agency.

Before a PHA can determine the services and activities it will provide to FSS families, it must identify the services and activities appropriate to each family. The action plan must contain a description of how the program will identify the needs of FSS families and deliver the services and activities according to these needs.

Supportive services needs will be identified by completion of an informal needs assessment with the FSS coordinator or case manager or coach before completion of the initial individual training and services plan and signing of the contract of participation.

DCHA’s FSS program, through its partners on the program coordinating committee, will provide the following activities and support services to FSS families:

Support Service General	Support Service Specific	Source/Partner
Assessment	Vocational Assessment Educational Assessment Vocational Planning Educational Planning Disability Assessment Disability Vocational Assessment/Planning Disability Educational Assessment/Planning Drug/Alcohol Assessment Drug/Alcohol Planning	Davis Behavioral Health ABLE Utah Workforce Services Rehabilitation Vocational Rehab
Education	High School ESL GED Post-secondary College	Davis School District Adult Education and ESL Classes Davis Technical College Weber State University Vocational Rehab - Utah Salt Lake Community College eSingleParent

Support Service General	Support Service Specific	Source/Partner
Training	Skills Training On-the-Job Training	Department of Workforce Services Vocational Rehab - Utah Davis Technical College LDS Employment Services People Helping People Salt Lake Community College Community Writing Center
Job Search Assistance	Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement	Davis Technical College Department of Workforce Services LDS Employment Services Weber State University
Transportation	Bus Train	Department of Workforce Services Utah Transit Authority Roads to Independence
Health Care	Alcohol and Drug Prevention and Treatment Mental Health Nutrition Dental Physical Health	Davis Behavioral Health Community Health Clinics of Utah Department of Workforce Services Family Nutritional Education Program National Alliance of Mental Health (NAMI) Utah Utah State University Extension – Food Sense Midtown Clinic Women, Infants and Children (WIC) Davis County Medical and Dental Clinics Liberty School Dental Clinic Stephen D. Ratcliffe Community Health Center + Dental
Child Care	Infant Care Toddler Care Preschool Care Afterschool Care Homework Assistance	Child Care Resource and Referral Open Doors Department of Workforce Services Head Start Davis County Davis School District After-School Programs

Support Service General	Support Service Specific	Source/Partner
Financial Management	Financial Education Financial Coaching Debt Resolution Credit Repair IDA Accounts	AAA Fair Credit Community Development Corporation of Utah Utah IDA Network Utah State University Extension Volunteer Income Tax Assistance
Legal Services	Representation Document Review Counsel or Advice	ACLU Utah Utah Legal Aid Disability Law Center
Child/Adult Protective Services	Needs Assessment Case Planning Information Referral Crisis Management	Davis County Health Department – Aging and Adult Services Utah Parent Center In-home Support Services Adult Abuse Hotline Child Abuse Hotline Foster Care Adoption Services
Crisis Services	Crisis Assessment Crisis Intervention Crisis Management Crisis Resolution	Safe Harbor Open Doors Community Action Program Crossroads Urban Center Family Support Center Mental Health Crisis Assistance Housing Retention Program Juvenile Receiving Center
Mentoring	Mentoring Match	People Helping People Open Doors – Circles Program Logistic Specialties LLC
Homeownership	Training Planning Debt Resolution	AAA Fair Credit Community Development Corporation of Utah NeighborWorks Salt Lake Northern Utah Habitat for Humanity Utah State University Extension

Method of Identifying Family Support Needs and Delivering Appropriate Support Services

Identifying Family Support Needs

To help determine the supportive services needs of each family, the FSS coordinator will work with the family to complete an initial informal needs assessment for that family before completion of the initial Individual Training Service Plan (ITSP) and signing of the contract of participation. After enrollment of the FSS program, the FSS coordinator may make referrals to partner agencies for completion of one or more formal needs assessments. These assessments may focus on such issues as: employment readiness and employment training needs, educational needs related to secondary and post-secondary education, financial health, and other topics, depending on the needs and interests of the family.

The formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.

Delivering Appropriate Support Services

Coaching: The FSS Coordinator will provide coaching services to help each participating family to:

- Understand the benefits of participation in the FSS program and how the program can help the family achieve its goals.
- Identify achievable, but challenging interim and final goals for participation in the FSS program, break down the goals into achievable steps and accompany the family through the process.
- Identify existing family strengths and skills.
- Understand the needs that the family has for services and supports that may help the family make progress toward their goals.
- Access services available in the community through referral to appropriate services providers.
- Overcome obstacles in the way of achieving a family's goals.

Transitional Support Service Assistance

No assistance or referrals will be available to families who have completed their CoP contracts.

Contract of Participation

All families enrolled in the FSS program will be required to sign a Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). This section describes the contents of the CoP and DCHA's policies and practices regarding the CoP.

Form and Content of Contract

The CoP, which will incorporate one ITSP for each participating member of the family, sets forth the principal terms and conditions governing participation in the FSS program. These include

the rights and responsibilities of the FSS family and of DCHA, the services to be provided to, and the activities to be completed by, each adult member of the FSS family who elects to participate in the program.

Individual Training and Services Plan (ITSP)

Each individual's ITSP will establish specific interim and final goals by which DCHA and the family will measure the family's progress towards fulfilling its obligations under the CoP. For any FSS family that is a recipient of welfare assistance at the outset of the CoP or that receives welfare assistance while in the FSS program, DCHA will establish as a final goal that every member of the family become independent from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

Determination of Suitable Employment

As defined in the FSS regulations (24 CFR 094.303(4)(iii)), a determination of what constitutes "suitable employment" for each family member with a goal of seeking and maintaining it will be made by DCHA, with the agreement of the affected participant, based on the skills, education, job training and receipt of other benefits of the family member and based on the available job opportunities within the community.

Contract of Participation Term and Extensions

The CoP will go into effect on the first day of the month following the execution of the CoP. The initial term of the CoP will run the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. Families may request up to two one-year extensions and are required to submit a written request that documents the need for the extension. DCHA will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

- (i) Circumstances beyond the control of the FSS family, as determined by DCHA, such as a serious illness or involuntary loss of employment;
- (ii) Active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension (e.g. completion of a college degree during which the participant is unemployed or under-employed, credit repair towards being homeownership ready, etc.) as determined by DCHA or
- (iii) Any other circumstances that DCHA determines warrants an extension including:
 - a. Death in the family
 - b. Medical emergency
 - c. Loss of Head of Household through death, incarceration or removal from lease
 - d. Resolution of a barrier to employment
 - e. Completion of a work-related certification

Completion of the Contract

The CoP is completed, and a family's participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members' ITSPs, on or before the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed. DCHA will accept the following form of verification for completion of the ITSP goals:

Self-certification to document completion of ITSP goals.

Modification

DCHA and the FSS family may mutually agree to modify the CoP with respect to the ITSP and/or the contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by DCHA as well as the Head of FSS Family.

DCHA will allow for modifications to the CoP under the following circumstances:

- When the modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency
- When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, after consultation with DCHA, designate another family member to be the FSS head of family
- When a relocating family is entering the FSS program of a receiving PHA and the start date of the CoP must be changed to reflect the date the new CoP is signed with the receiving PHA.

DCHA will allow modifications at any time during the term of the CoP.

Program Termination, Withholding of Services and Available Grievance Procedures

Involuntary Termination

DCHA may involuntarily terminate a family from FSS under the following circumstances:

If the participant's housing assistance has been terminated, or

If the participant fails to meet their obligations under the CoP, the ITSP and related documentation. Non-compliance includes:

- Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
- Failure to work on activities and/or goals set forth in the ITSP, including employment activities.
- Failure to complete activities and/or goals within the specified time frames

Participants who fail to meet their obligations under this section, as determined by an FSS coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned DCHA representative to review the situation. At this meeting, a review

of the CoP, ITSP and all related documentation will be conducted and amendments will be made as necessary (within HUD guidelines) to allow for changes in circumstances. Failure to contact the FSS Coordinator to schedule this meeting within ten (10) days of a written request by the FSS program to set up this meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue(s), may lead to termination from the program. The FSS Coordinator will also attempt to contact the participant via phone, in person and/or email prior to the review meeting. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program.

If the initial meeting does not resolve the problem, or if the meeting is not requested by the family within the required period, notification of termination will be made to the family by letter stating:

1. The specific facts and reasons for termination;
2. A statement informing the family of their right to request an informal hearing and the date by which this request must be received (see *Grievance Procedures*);
3. A statement informing the family that termination from the FSS program for the reasons stated therein will not result in termination of the family's housing assistance. Failure to request a hearing in writing by the deadline will result in closure of the family's FSS file and all rights to a hearing will be waived. All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. Housing assistance will not be terminated based on non-compliance with the FSS program. The current amount of escrow in the family's escrow account will be included in the letter.

Voluntary Termination

Participants may also be terminated from the FSS program under the following circumstances:

- Mutual consent of both parties; and/or
- The family's withdrawal from the program.

Termination with Escrow Disbursement

In most cases, families whose FSS contracts are terminated will not be entitled to disbursement of their accrued FSS escrowed funds. However, the CoP will be terminated with FSS disbursement when one of the following situations occurs:

- a. Services that DCHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.
- b. The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless DCHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- c. An FSS family in good standing moves outside of the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR §982.353) for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

Grievance Procedures

The grievance and informal hearing procedures for the FSS program will be the same as the grievance and hearing procedures adopted for the DCHA Section 8 Administrative Plan (see chapter 16 Part III.C). All requests for an informal hearing must be received by DCHA within ten (10) business days of the date of the denial or FSS termination letter from the FSS Coordinator. If a hearing is requested by the FSS family, notification of the family regarding the date, time and location of the informal hearing will be made by mail.

Persons included in the informal hearing shall include, but not be limited to:

- The FSS Head of Household;
- The FSS Coordinator; and
- DCHA staff members, other than FSS program staff, serving as the Hearing Officer

All participants have the right to obtain legal representation and provide their witnesses.

The family may request to reschedule a hearing for good cause (defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family), or if it is needed as a reasonable accommodation for a person with disabilities. Requests to reschedule a hearing must be made in writing within five (5) days prior to the hearing date.

INFORMAL REVIEWS AND HEARINGS [Notice PIH 2019-23]

In addition to reasons for an informal hearing listed at 24 CFR 982.555(a)(1)(i)–(v) (See 16-III.C. Informal Hearings for Participants), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to an owner action in accordance with the individual’s lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident’s rights, obligations, welfare, or status.

☐ For any hearing required under 24 CFR 982.555(a)(1)(i)–(v), the contract administrator will perform the hearing in accordance with Chapter 16 Part III: Informal Reviews and Hearings, as is the current standard in the program.

☐ For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

An informal hearing will not be required for class grievances or for disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement does not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.

The owner must give residents notice of their ability to request an informal hearing as outlined in

24 CFR 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR 982.555(a)(1)(i)–(v). (See Chapter 16)

The owner must provide an opportunity for an informal hearing before an eviction.

Assurance of Non-Interference

Participation in the FSS Program is voluntary. A family's decision on whether to participate in FSS will have no bearing on DCHA's decision of whether to admit the family into the DCHA Housing Choice Voucher program. The family's housing assistance will not be terminated based on whether they decide to participate in FSS, their successful completion of the CoP, or on their failure to comply with FSS program requirements.

DCHA will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.

Reasonable Accommodations, Effective Communications and Limited English Proficiency

Requests for Reasonable Accommodations and Effective Communications

A person with disabilities may request reasonable accommodations to facilitate in participation in the FSS program. Requests will be considered on a case-by-case basis.

Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's reasonable accommodation policy. The policy is available online at www.daviscommunityhousing.com/hcv.

Limited English Proficiency

DCHA will comply with HUD requirements to conduct oral and written communication to the FSS program in languages that are understandable to people with Limited English Proficiency.

Coordination of Services

Certificate of Coordination

The FSS action plan is required to contain a certification that the development of the activities and services under the FSS program has been coordinated with the JOBS program (now Welfare to Work under TANF), the programs under title I of the Workforce Innovation and Opportunity Act, and any other relevant employment, child care, transportation, training, and education programs in the applicable area. The implementation of the FSS program's activities and services must continue to be coordinated as such to avoid duplication of activities and services.

DCHA certifies that its FSS program has developed its services and activities in coordination with programs under Title I of the Workforce Innovation and Opportunity Act, Workforce Investment Board and American Job Centers (also known as Workforce Centers or One Stop Career Centers), and any other relevant employment, child care, transportation, training, and education programs in the applicable area. The implementation of these activities and services will continue to be coordinated in this manner to avoid duplication of activities and services.

Program Coordinating Committee

As another integral part of FSS program administration, each participating PHA must establish a program coordinating committee (PCC) whose functions will be to assist the PHA in securing commitments of public and private resources for the operation of the FSS program within the PHA's jurisdiction, including assistance in developing the action plan and in implementing the program [24 CFR 984.202(a)].

The PCC required members consist of representatives of the PHA, representatives from a variety of agencies and individuals, including at least one FSS Program Coordinator, and one or more participants from each HUD rental assistance program (Section 8, public housing, or multifamily assisted housing) served by the PHA's FSS program.

The PCC meets quarterly and may conduct business on 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, UT 84107.

Portability

Definitions

For the purposes of portability with regards to the FSS program, the following definitions will be used [24 CFR 982.4, 24 CFR 984.306].

Initial PHA means both:

A PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and

A PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.

Receiving PHA means a PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA either absorbs the family into its program, including issuing a voucher and providing rental assistance to the family, or bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher.

Relocating FSS Family refers to an FSS family that moves from the jurisdiction of a PHA at least 12 months after signing its contract of participation.

Portability in Initial 12 Months

Families participating in a Section 8 FSS program are required to lease an assisted unit within the jurisdiction of the PHA that selected the family for the FSS program for a minimum period of 12 months after the effective date of the contract of participation. However, the initial PHA may approve a family's request to move outside its jurisdiction under portability during this

period if the move is in accordance with the regulations at 24 CFR 982.353 [24 CFR 984.306(a)(1)].

DCHA will approve a family's request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation if the move is in accordance with the regulations for such moves at 24 CFR 982.353.

After the first 12 months of the FSS contract of participation, the FSS family may move outside the initial PHA jurisdiction under portability procedures regardless of PHA approval [24 CFR 984.306(a)(2)].

FSS Options for Porting Families

Whether the receiving PHA bills the initial PHA or absorbs the FSS family into its Section 8 program, the receiving PHA must enroll an FSS family in good standing in its FSS program. However, if the receiving PHA is already serving the number of FSS families identified in its FSS Action Plan and determines that it does not have the resources to manage the FSS contract or the receiving PHA, the initial PHA may agree to the FSS family's continued participation in the initial PHA's FSS program. Prior to the PHAs agreeing to the continued participation, the initial PHA must determine that the relocating FSS family has demonstrated that, notwithstanding the move, it will be able to fulfill its responsibilities under the initial or a modified contract at its new place of residence.

DCHA, as the initial housing authority, will agree to the participant's continued participation in their FSS program so long as the relocating family has demonstrated, with the assistance of the FSS Coordinator, that it will be able to fulfill its responsibilities under the initial or a modified contract at its new place of residence.

Where continued FSS participation is not possible, the initial PHA must clearly discuss the options that may be available to the family. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or termination of the FSS contract and forfeiture of escrow.

DCHA will clearly discuss the options that are available to the family where continued FSS participation is not possible. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

If the receiving PHA does not administer an FSS program, the FSS family may not continue participation in the FSS program. The initial PHA must clearly discuss the options that may be available to the family. These may include, but are not limited to, modification of the FSS contract, locating a receiving PHA that administers an FSS program, termination of the FSS

contract with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

DCHA will, as stated above, clearly discuss the options that may be available to the family where continued FSS participation is not possible. Depending on the family's contract specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or termination of the FSS contract and forfeiture of escrow.

Contract of Participation

If the FSS family enrolls in the receiving PHA's FSS program, the receiving PHA will enter a new contract with the FSS family for the term remaining on the contract with the initial PHA. The initial PHA will end its contract with the family.

If the FSS family remains in the FSS program of the initial PHA, pursuant to this section, the contract executed by the initial PHA will remain as the contract in place.

Termination of FSS contract and Forfeiture of Escrow Account [984.306(e)]

If an FSS family relocates to another jurisdiction and is unable to fulfill its obligations under the contract, including any modifications, the PHA, which is a party to the contract, must terminate the FSS family from the FSS program. The family's FSS escrow account will be forfeited.

Termination of FSS program participation and forfeiture of FSS escrow must be used only as a last resort after the PHA determines, in consultation with the family, that the family would be unable to fulfill its obligations under the contract after the move, that locating another receiving housing authority with a FSS program is not possible, that the current contract cannot be modified to allow for completion prior to porting, and that the current contract cannot be terminated with FSS escrow disbursement. When termination is the only option, the PHA must clearly notify the family that the move will result in the loss of escrow funds. The PHA must follow its policy for clearly notifying the FSS family of the forfeiture.

Definitions

Certification means a written assertion based on supporting evidence, provided by the FSS family or the PHA or owner, which must be maintained by the PHA or owner in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification. These must be made available for inspection by HUD, the PHA or owner, and the public, when appropriate. In addition, these will be considered accurate unless the Secretary or the PHA or owner, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

Contract of participation (CoP) means a contract in a form approved by HUD, entered into between a participating FSS family and a PHA operating an FSS program that sets forth the

terms and conditions governing participation in the FSS program. The contract of participation includes all individual training and services plans entered in between the PHA and all members of the family who will participate in the FSS program, and which plans are attached to the contract of participation as exhibits. For additional detail, see 24 CFR 984.303.

Effective date of contract of participation means the first day of the month following the month in which the FSS family and the PHA entered into the contract of participation.

Eligible families for the FSS program means current participants in Section 8, residents of public housing, or residents in multifamily-assisted housing if a Cooperative Agreement exists.

Enrollment means the date that the FSS family entered the contract of participation with the PHA.

Family self-sufficiency program or FSS program means the program established by a PHA within its jurisdiction to promote self-sufficiency among participating families, including the provision of supportive services to these families, as authorized by section 23 of the 1937 Act.

FSS escrow account means the FSS escrow account authorized by section 23 of the 1937 Act.

FSS escrow credit means the amount credited by the PHA to the participating family's FSS account.

FSS family means a family that receives Section 8 assistance or resides in public housing (section 9), that elects to participate in the FSS program, and whose designated adult member (head of FSS family) has signed the CoP.

FSS family in good standing means an FSS family that is in compliance with their FSS CoP, has either satisfied or are current on any debts owed the PHA or owner, and is in compliance with the regulations in 24 CFR Part 5 regarding participation in the relevant rental assistance program.

FSS-related service program means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of *supportive services*.

FSS slots refer to the total number of public housing units or the total number of rental vouchers that comprise the minimum size of a PHA's respective Section 8 and public housing FSS program.

FSS Program Coordinator means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS participants; goal setting and case management/coaching of FSS participants; collaborating with the community and service partners; and tracking program performance.

FY means federal fiscal year (starting with October 1, and ending September 30, and designated by the calendar year in which it ends).

Head of FSS family means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent.

Individual Training and Services Plan (ITSP) means a written plan that is prepared by the PHA or owner in consultation with a participating FSS family member (the person with for and whom the ITSP is being developed), and which describes the final and interim goals for the participating FSS family member, the supportive services to be provided to the participating FSS family member, the activities to be completed by that family member, and the agreed upon completion dates for the goals, and activities. Each ITSP must be signed by the PHA or owner and the participating FSS family member and is attached to and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS program, including the head of FSS family who has signed the CoP.

Section 8 means assistance provided under Section 8 of the 1937 Act (42 U.S.C. 1437f). Specifically, multifamily-assisted housing, as defined in this section; tenant-based and project-based rental assistance under section 8(o) of the 1937 Act; the HCV homeownership option under section 8(y) of the 1937 Act; Family Unification Program (FUP) assistance under section 8(x) of the 1937 Act; and the Section 8 Moderate Rehabilitation (Mod Rehab) for low-income families and Moderate Rehabilitation Single Room Occupancy (Mod Rehab SRO) for homeless individuals under 24 CFR part 882.

Self-sufficiency means that an FSS family is no longer receiving Section 8, public housing assistance, or any federal, state, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS account funds.

Supportive services mean those appropriate services that a PHA will coordinate on behalf of an FSS family under a CoP. These may include child care of a type that provides sufficient hours of operation and serves an appropriate range of ages; transportation necessary to enable a participating family to receive available services or to commute to their places of employment; remedial education; education for completion of secondary or post-secondary schooling; job training, preparation, and counseling; job development and placement; follow-up assistance after job placement and completion of the contract of participation; substance/alcohol abuse treatment and counseling; training in homemaking and parenting skills; and personal welfare services that include substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services; household management; money management; counseling regarding homeownership or opportunities available for affordable rental and homeownership in the private housing market (including information on an individual's rights under the Fair Housing Act) and financial empowerment that may include financial literacy, coaching, asset building, money management; and any other services and resources, including case management and reasonable accommodations for individuals with disabilities, that the

PHA may determine to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency.

Welfare assistance means (for purposes of the FSS program only) income assistance from federal or state welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs. Welfare assistance does not include nonrecurrent, short-term benefits that are designed to deal with a specific crisis situation or episode of need, or are not intended to meet recurrent or ongoing needs and will not extend beyond four months; work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training); supportive services such as child care and transportation provided to families who are employed; refundable earned income tax credits; contributions to, and distributions from, individual development accounts under TANF; services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement and other employment-related services that do not provide basic income support; transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of the Social Security Act, to an individual who is not otherwise receiving assistance; amounts solely directed to meeting housing expenses; amounts for health care; food stamps and emergency rental and utilities assistance; and SSI, SSDI, or social security.