

# **ACTION PLAN**

## **FAMILY SELF SUFFICIENCY PROGRAM**



Housing Authority of the City of San Buenaventura

Updated September 28, 2022



**TABLE OF CONTENTS**

	<u>Page</u>
<b>I. Introduction.....</b>	<b>4</b>
<b>II. Program Objectives.....</b>	<b>4</b>
<b>III. Program Size and Characteristics.....</b>	<b>5-8</b>
A. Family Demographics	
B. Supportive Services Needs	
C. Estimate of Participating Families	
D. Other Self-Sufficiency Programs	
<b>IV. FSS family Selection Procedures.....</b>	<b>8-10</b>
A. Waiting List	
B. Admissions Preferences	
C. Screening for Motivation	
D. Compliance with Nondiscrimination Policies	
E. Re-enrollment of Prior Participants	
F. Head of FSS Family	
<b>V. Outreach Efforts.....</b>	<b>10</b>
<b>VI. FSS Escrow Account and Other Incentives for Participants.....</b>	<b>10-13</b>
A. Additional Incentives	
B. Interim Disbursements	
C. Uses of Forfeited Escrow Funds	
<b>VII. Family Activities and Supportive Services.....</b>	<b>13-16</b>
<b>VIII. Method of Identifying of Family Support Needs and Delivering Appropriate Support Services</b>	
.....	<b>16-17</b>
A. Identifying Family Support Needs	
B. Delivering Appropriate Support Services	
C. Transitional Supportive Service Assistance	
<b>IX. Contract of Participation.....</b>	<b>17-20</b>
A. Form and Content of Contract	
B. ITSP Goals	
C. Determination of Suitable Employment	
D. Contract of Participation Term and Extensions	
E. Completion of the Contract	
F. Modification	
G. Consequences of Noncompliance with the Contract	
<b>X. Program termination, Withholding of services, and Available Grievance Procedures.....</b>	<b>20-22</b>
A. Program Termination	

	B. Termination with Escrow Disbursement	
	C. Grievance Procedures	
<b>XI.</b>	<b>Assurance of Non-Interference</b> .....	22
<b>XII.</b>	<b>Timetable</b> .....	22-23
<b>XIII.</b>	<b>Reasonable Accommodations, Effective Communications, and Limited English Proficiency</b> .....	23
	A. Requests for Reasonable Accommodations	
	B. Request for Effective Communications	
	C. Limited English Proficiency	
<b>XIV.</b>	<b>Coordination of Services</b> .....	23-25
	A. Certification of Coordination	
	B. Program Coordinating Committee	
<b>XV.</b>	<b>FSS Portability</b> .....	25-26
	A. Portability in Initial 12 Months	
	B. Moves into the HACSB’s Jurisdiction	
	C. Moves out of HACSB’s Jurisdiction	
	D. FSS Termination with Disbursement for Porting Families	
<b>XVI.</b>	<b>Other Policies</b> .....	26-27
<b>XVII.</b>	<b>Definitions</b> .....	27-30

## **I. Introduction**

This document constitutes the Family Self-Sufficiency (FSS) Program Action Plan for the FSS program operated by The Housing Authority of the City of San Buenaventura (HACSB). It was submitted to HUD on September 28, 2022.

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 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.

This FSS Action Plan describes the HACSB's 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 HACSB staff are consistent with the HACSB's personnel policy and Agency Plan.

This FSS Action Plan has been developed in compliance with requirements of the Code of Federal Regulations at 24 CFR §984.201, as authorized by the Family Self-Sufficiency (FSS) Program created by Section 554 of the Cranston-Gonzalez National Affordable Housing Act (NAHA) of 1990. The purpose of Section 554 is to "promote the development of local strategies to coordinate use of public housing and assistance under the certificate and voucher programs under Section 8 with public and private resources, to enable eligible families to achieve economic independence and self-sufficiency."

## **II. Program Objectives**

The HACSB mission is to "provide and develop quality affordable housing for eligible low-income residents of Ventura County and to establish strong partnerships necessary for HACSB customers to achieve personal goals related to: literacy and education; health and wellness; and job training and employment leading to personal growth and economic self-sufficiency."

The FSS is a U.S. Department of Housing and Urban Development (HUD) program that encourages communities to develop local strategies to help Housing Choice Voucher (Section 8) families and/or families in the Public Housing Program to obtain employment that will lead to economic independence and self-sufficiency. Public Housing Agencies (PHAs) work with welfare agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a living wage.

The FSS Program promotes the development of local strategies to coordinate the use of public housing assistance with other public and private resources to enable eligible families to, in accordance with HUD priorities, achieve greater economic independence and self-sufficiency, build assets, and use housing as a platform to improve quality of life.

### III. Program Size and Characteristics

#### A. *Family Demographics*

The tables below describe the demographics of the population expected to be served by HACSB's Action Plan. The FSS program will serve the following housing assistance programs:

1. Public Housing
2. Housing Choice Vouchers (HCV):
  - a. Tenant-Based Vouchers (TBV)
  - b. Project-Based Vouchers (PBV)
  - c. HCV Homeownership
  - d. Other special purpose vouchers (FUP, FUP-Y, VASH, EHV, MSV)

#### **Ages of Head of Household and Other Adults**

<b>Ages of Head of Household</b>	<b>Percent</b>
<i>Head of Household is age 24 years or younger</i>	.5%
<i>Head of Household is age 25 to 50</i>	33.5%
<i>Head of Household is age 51 to 61</i>	42.7%
<i>Head of Household is age 62 or greater</i>	23.3%
<b>Ages of Other Adults in Household</b>	
<i>Age 24 years or younger</i>	73.3%
<i>Age 25 to 50</i>	15.9%
<i>Age 51 to 61</i>	5.4%
<i>Age 62 or greater</i>	5.4%

#### **Presence and Ages of Children**

<b>Presence and Ages of Children</b>	<b>Percent</b>
<i>Households that only include adults over age 18</i>	72.0%
<i>Households that include one or more child age 13-17</i>	14.5%
<i>Households that include children who are all 12 or younger</i>	13.5%

#### **Employment Status of Population to be Served**

<b>Employment Status of Head of Household</b>	<b>Percent</b>
<i>Families with an employed head</i>	25.9%
<i>Families whose head is unemployed</i>	74.1%
<b>Employment Status of All family members</b>	
<i>Families with any member that is employed</i>	33.4%
<i>Families with no employed member</i>	66.6%

**Annual Earned Income of Population to be Served**

<b>Annual Earned Income of Household</b>	<b>Percent</b>
<i>Earnings &lt;\$5,000 per year</i>	4.7%
<i>Earnings between \$5,000 and \$9,999</i>	4.3%
<i>Earnings between \$10,000 and \$14,999</i>	38.1%
<i>Earnings between \$15,000 and \$19,999</i>	13.6%
<i>Earnings between \$20,000 and \$24,999</i>	10.0%
<i>Earnings between \$25,000 and \$29,999</i>	6.5%
<i>Earnings between \$30,000 and \$34,999</i>	5.6%
<i>Earnings of \$35,000 or higher</i>	17.2%

**Elderly/Disability Status of Population to be Served**

<b>Elderly/Disability Status of Head of Household</b>	<b>Percent</b>
<i>Head of Household is an elderly person without disabilities</i>	13.7%
<i>Head of Household is an elderly person with disabilities</i>	28.9%
<i>Head of Household is a non-elderly person without disabilities</i>	52.9%
<i>Head of Household is neither an elderly person nor a person with disabilities</i>	33.3%
<b>Elderly/Disability Status of All Household Members</b>	
<i>Household includes an elderly person without disabilities</i>	17.9%
<i>Household includes an elderly person with disabilities</i>	30.5%
<i>Household includes a non-elderly person with disabilities</i>	30.8%
<i>Household includes no elderly persons or persons with disabilities</i>	43.2%

**Race and Ethnicity of Population to be Served**

<b>Race</b>	<b>Non-Hispanic</b>	<b>Hispanic</b>
<i>White</i>	89.4%	39.3%
<i>Black or African American</i>	4.9%	92.3%
<i>American Indian or Alaska Native</i>	.6%	65.0%
<i>Asian</i>	2.0%	94.0%
<i>Native Hawaiian or other Pacific Islander</i>	.2%	85.7%
<i>Other Race</i>	2.9%	75.8%

**B. Supportive Services Needs**

The following is a list of the supportive service needs of the families expected to enroll in the HACSB FSS Program. This list of supportive services is based on experience with past FSS program participants and input from the Program Coordinating Committee (PCC) and/or other service provider partners. (An expansion on the PCC partnerships can be found in Section XIV Coordination of Services.)

- Basic and remedial education
- Obtaining GED
- Obtaining higher education
- English as a second language (ESL)
- Adult literacy and education programs
- Community College programs
- Daycare services referrals
- Substance abuse referrals
- Credit counseling and repair
- Tax preparation and filing services
- Basic family money-management education and counseling
- Homeownership education, preparation, and pre-purchase counseling
- Parenting skills and after school programs
- Vocational and job training
- Legal assistance
- Veteran resources
- Transportation referrals and driver education
- Professional appearance guidance
- Resume preparation and updating
- Mental health care and counseling services
- Health and wellness services
- Services for the aging
- Self-owned business and entrepreneurship
- Immigration and citizenship services

*C. Estimate of Participating Families*

Over time, HACSB 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, the HACSB has been funded for one (1) FSS Coordinator. The minimum number of participants required to be served based on this funding is twenty-five (25).

Historically, HACSB's FSS program has enrolled ten (10) new families into the FSS program each year. Accordingly, HACSB expects to be able to provide FSS services to seventy-five (75) families over a five-year period.

**Minimum Program Size.** In accordance with 24 CFR §984.105, HACSB has a remaining FSS program mandate to serve thirteen (13) families. This is calculated based on the table below. This is our best estimate currently, and it includes the mandate for both the Public Housing program and the HCV program and counts graduates from both programs.

Original Number of Participants Mandated in both HCV and PH	FSS Graduates	Remaining Mandatory Slots
60	47	13

Therefore, as of the time of preparation of this Action Plan, the HACSB expects to be able to serve seventy-five (75) families in the FSS program at any one time.

*D. Other Self-sufficiency Programs*

The HACSB expects to enroll into FSS families from the self-sufficiency programs listed below.

- Family Unification Program-Youth (FUP-Y) → three (3) family max over a 5-year period
- Resident Opportunity and Self-Sufficiency → one (1) family each year
- Veterans Affairs Supportive Housing (VASH) → one (1) family each year

**IV. Family Selection Procedures**

*A. Waiting List*

A waiting list will be maintained for families whose applications cannot be accepted at the time of initial application due to program capacity limits. The waiting list will include the name and contact information for the head of household of the participant family and the date of their application.

*B. Admissions Preferences*

The FSS program has not adopted any admissions preferences, including for porting families. Families will be selected with eligible families in accordance with an objective selection system based on the date the family expressed an interest in participating in the FSS program. The selection of eligible resident families shall be established via an interest list with preference allotted according to date and time of receipt of a form expressing interest in participating in the FSS Program.

*C. Screening for Motivation*

The HACSB will use one motivational screening factor to measure the family’s interest and motivation to participate in the FSS program. The following criteria will be used:

The HACSB will screen families for motivation to participate in the FSS program by requiring that families who apply to enroll in the FSS program attend an initial orientation session (in-person and/or virtual). Each family will be given two opportunities to attend the orientation session and may request accommodation if unable to attend a scheduled orientation session. Accommodations will be offered on a case-by-case basis, depending on the needs of the participant. Accommodations may include an individually scheduled orientation session, provision of transportation to/from the orientation site, translation services, an alternative location, a virtual orientation session, or allowance and encouragement to bring children to the session, where possible.



#### *D. Compliance with Nondiscrimination Policies*

It is the policy of HACSB 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, HACSB's FSS staff will provide reasonable accommodation 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. Participants 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, HACSB will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

#### *E. Re-enrollment of Prior FSS Participants*

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

- FSS participants who have withdrawn voluntarily
- Families terminated with escrow disbursement
- Families involuntarily terminated

Any participant who voluntarily withdraws from the FSS Program or does not successfully complete the Contract of Participation (CoP), may submit a request in writing to enter a new CoP under the following circumstances:

1. The family still meets general eligibility standards;
2. The family was not terminated from the FSS program due to fraud;
3. The family's written request explains in what way circumstances have changed which will result in a more successful outcome for the new CoP;
4. At least one calendar year or one re-exam has occurred since the first CoP was terminated; and
5. The family will receive low priority by being placed in the waiting list behind any other families waiting to enroll in the program.

There is no maximum number of times a family may request to re-enroll in the program, pending meeting the circumstances listed above. If the family completes the FSS program, it may continue to receive rental assistance if needed. However, the family may not re-enroll for the FSS program a second time if they complete the FSS program but may be offered FSS supportive services to help continue toward self-sufficiency.

#### *F. Head of FSS Family*

The head of FSS family is designated by the participating family. The HACSB may make itself available to 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 or any changes by the household to the head of FSS family must be submitted to the HACSB in writing with all adult members in household signing an acknowledgement form (developed by HACSB) of the designated head of FSS family. All adult members are also encouraged, but not required, to attend the FSS orientation. If there is an adult member in the household that denies signing the acknowledgement form, the family may not enroll in the FSS program. This form will be filed in each participant's FSS file.

#### **V. Outreach Efforts**

The HACSB will conduct widespread outreach to encourage enrollment in the FSS program. Outreach efforts will include the activities identified through the list below. Interpreters will be used as needed and participants may contact staff to express interest in-person, via our toll-free telephone number or by email.

- Posting information about FSS on the HACSB's website and any latest information will be posted monthly on a FSS designated page
- Posting FSS program flyers in locations likely to be seen by eligible families monthly through electronic bulletin boards and/or shadowboxes at HACSB properties
- Providing information about the FSS program during scheduled examinations annually by inserting FSS flyers in their mailed packets
- Providing information about the FSS program at voucher orientation sessions every time a future resident is given a briefing packet

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 can participate in the FSS Program. In conducting outreach, the HACSB 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 can do so.

#### **VI. 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 escrow account, as well as any additional incentives offered by the HACSB, are described below.

### Escrow Accounts Information and Interest Accrual

An interest-bearing escrow (savings) account is established for each FSS program participant. The amount of FSS credit or escrow contribution is computed according to HUD regulations and guidelines. During the Contract of Participation (CoP), the FSS escrow account credit amount shall be determined at each re-examination of income occurring after the effective date of the CoP. Each escrow credit amount is deposited each month by HACSB (accounting department) to each participant's escrow account.

All escrow accounts shall be managed in the manner deemed acceptable according to HUD Rules and Regulations. The amount of the FSS escrow contribution shall be calculated according to HUD statute as defined in the applicable registrar. An FSS Escrow Account Credit Worksheet (HUD form 52652) is completed for each new lease, reexamination, and interim change for all FSS program participants.

The accounting department maintains escrow accounts according to HUD regulations and invests escrow funds in the HUD-approved investments. The FSS Coordinator will work with the accounting department to ensure all accounts are accurate. Interest is accrued as earned and a quarterly account balance/report is made available upon request by the family or an authorized agency. An FSS ledger, which includes beginning and ending balance, monthly credit and interest amounts, and any deductions, are sent out to each participant during their FSS anniversary for those that have an established escrow account.

If the FSS family is found to have under-reported income in the re-examination used to set the baseline, the escrow for the entire period of the CoP will be re-calculated using the correct income to set the baseline and then calculate subsequent escrow amounts.

When the CoP is terminated or during the time that an HCV family is in the process of moving into a new unit and is not under a lease, HACSB will not make additional credits to the family's FSS escrow account.

### Final Distribution

When the HACSB determines that a CoP has been completed through an exit evaluation, the final amount of the escrow account, including final interest, will be distributed to the head of FSS family in accordance with HUD guidelines. There will be no additional escrow credits to the family's FSS escrow account after the family has completed the CoP requirements. The HACSB will issue and present a check payable to the head of the FSS Family within 21 days of the duly documented completion date, including a copy of their recent escrow ledger and HUD memos regarding the escrow accounts.

If the family has not paid the family contribution towards rent, or other amounts, if any, due under the public housing or Section 8 assisted lease, the balance in the family's FSS account shall be reduced by that amount owed at the time of the final disbursement of the FSS escrow savings.

The CoP completion requirements to receive the final escrow distribution are:

1. Head of FSS family has suitable employment;
  - i. In rare situations, if head of FSS family is "furloughed" from their employer, this is considered employed, if the employer has intentions of returning the participant to work. If the head of FSS family is "laid-off" from their employer, this is considered unemployed for graduation purposes.
2. Head of FSS family and any adults with an Individual Training and Services Plan (ITSP) have completed all goals within the period of the contract; and

3. Head of FSS family and all family members in the household are no longer receiving any welfare (cash) assistance at the time of graduation.

#### *A. Additional Incentives*

While the HACSB'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 valuable for FSS program participants.

#### *B. Interim Disbursements*

Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, to pay for specific goods or services that will help the family make progress toward achieving the goals in its ITSP. Requests must be made in writing through an interim withdrawal request. The head of FSS family participating in the FSS program may request an interim disbursement of escrow funds through the term of the CoP and prior to the completion of the program. One interim request can be made annually. A review and 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 the Deputy Director of Community Services. The FSS Coordinator and Deputy Director of Community Services will provide an approval or denial letter of the final decision to the interim request. Interim withdrawal money is to be used only for FSS related goals.

Interim requests are not intended to be used for personal expenses as they relate to FSS goals (phone bills, rent, car payments, electricity bills, credit card debt, etc.). Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment. 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.

Interim disbursements are granted for no more than thirty percent (30%) of the family's escrow balance. All situations are to be evaluated on a case-by-case basis. A formal letter addressed to participant will be mailed out/delivered and the check is to be made to a third-party vendor. If the third-party vendor does not accept HACSB checks, the FSS Coordinator will find another method of payment. In rare instances, the check can be made out to head of FSS family. In this case, the participant must provide backup documentation that the purchase was completed for the stated purchase request.

#### *C. Uses of Forfeited Escrow Funds*

Forfeited escrow funds remaining from terminated participants will be collected in a general fund and may be disbursed evenly among participants in good standing on a regular basis. At the discretion of the FSS Coordinator, forfeited escrow funds may be considered in lieu of an interim disbursement. Forfeited escrow funds may be deployed at any time during the term of a household's CoP.

A determination of whether the family qualifies for these requested funds will be made on a case-by-case basis by the FSS Coordinator and the Deputy Director of Community Services. The FSS Coordinator will first explore options for services and in-kind donations from partners, which must be exhausted before a request for use of forfeited funds will be approved.

FSS escrow account funds forfeited by the FSS family must be used by HACSB for the benefit of the FSS participants that are in good standing. Specifically, such funds may be used for the following eligible activities:

1. Support for FSS participants in good standing, including, but not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, transportation, childcare, training, testing fees, employment preparation costs, partner workshops and other costs related to achieving obligations outlined in the CoP;
2. Training for FSS Program Coordinator(s); and
3. Other eligible activities as determined by the Secretary

HACSB will use forfeited escrow to cover the cost of FSS participant services delivered in a group setting on a first come, first serve basis. A group presentation and training on credit counseling is an example of this type of service. When forfeited escrow monies are used to meet personal need, such as gas cards, HACSB will determine the need and provide the same value service equally to all FSS participants.

Such funds may not be used for salary and fringe benefits of FSS Program Coordinators, general administrative costs of the FSS program, for housing assistance payments (HAP) expenses or public housing operating funds, or any other activity determined ineligible by the Secretary.

A withdrawal request and/or billing to the forfeited funds account can only be done by the FSS Coordinator and the approval of the Deputy Director of Community Services. Use of forfeited escrow funds for eligible uses may be requested by the Head of the FSS family in writing. Once a decision is made, the HACSB will provide an approval or denial request in writing to the head of FSS family. A withdrawal request and/or billing indicating the amount and identifying what the use of funds are for will be provided with a check request to HACSB's accounting department for withdrawal from the account created for this purpose per Accounting Brief #26. There is no maximum limit of how many requests and/or how much funds requested can be submitted and/or approved per year. A withdrawal request is only intended for the reasons listed above, which includes support for FSS participants in good standing and training for the FSS Program Coordinator(s).

Amounts in the FSS escrow account shall be forfeited upon the occurrence of one the following:

1. The CoP is terminated; or
2. The CoP is completed by the family, but the FSS family is receiving welfare assistance at the time the CoP term expires, including any extension thereof

## **VII. Family Activities and Supportive Services**

As described in the next section, all families participating in the FSS program will benefit from coaching that helps them identify and achieve goals that the family selects. Drawing on partners on the PCC and relationships with other service providers, the coaches will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals.

All FSS program participants require educational and employment assessment followed by education

program and job-training enrollment. A high school diploma or equivalent, financial management education and English language proficiency are considered top priorities. The PCC will assist the HACSB staff to obtain the following support services, in the HACSB's quest for a successful FSS Program.

<b>Supportive Service Category</b>	<b>Specific Service</b>	<b>Source/Partner</b>
<b>Assessment</b>	Vocational Assessment Educational Disability Assessment Other specialized assessments	<ul style="list-style-type: none"> <li>• Owens Valley Career Development Center</li> <li>• State of California Dept. of Rehabilitation</li> </ul>
<b>Child Care</b>	Infant Care / Toddler Care Preschool Care Afterschool Care	<ul style="list-style-type: none"> <li>• Boys &amp; Girls Clubs of Greater Oxnard &amp; P.H.</li> <li>• Child Development Inc. (CDI)</li> <li>• Child Development Resources (CDR)</li> <li>• Ventura Family YMCA</li> </ul>
<b>Transportation</b>	Bus passes	<ul style="list-style-type: none"> <li>• Gold Coast Transit</li> </ul>
<b>Education</b>	High School Equivalency/GED English as a Second Language Post-secondary certificates Advanced Degrees	<ul style="list-style-type: none"> <li>• California Lutheran University</li> <li>• Cal State Channel Islands University</li> <li>• Oxnard Adult School</li> <li>• Oxnard College (EOPS/CARE)</li> <li>• Ventura Adult &amp; Continuing Education (VACE)</li> <li>• Ventura College (EOPS/CARE)</li> <li>• Ventura Library</li> <li>• Ventura Unified School District</li> <li>• Vista Real Public High School (Learn 4 Life)</li> </ul>
<b>Skills Training</b>	Training in Executive Function Basic Skills Training Emerging Technologies Training Biomedical Training (including CNA, phlebotomy, x-ray, and other tech, etc.) On-the-Job Training Apprenticeships Skilled Labor training	<ul style="list-style-type: none"> <li>• Americas Job Center of CA-Ventura County</li> <li>• Center for Employment Training (CET)</li> <li>• Owens Valley Career Development Center</li> </ul>
<b>Job Search Assistance</b>	Resume Preparation Interviewing Skills	<ul style="list-style-type: none"> <li>• Americas Job Center of CA-Ventura County</li> <li>• Ventura Adult &amp; Continuing Education (VACE)</li> <li>• Ventura County Human</li> </ul>

	<p>Dress for Success</p> <p>Workplace Skills</p> <p>Job Development</p> <p>Job Placement</p>	<p><i>Services Agency</i></p> <ul style="list-style-type: none"> <li>• <i>Workforce Innovation and Opportunity Act (WIOA)</i></li> <li>• <i>Workforce Development Board of Ventura County (WDBVC)</i></li> </ul>
<b>Micro and Small Business Development</b>	<p>Small business development services</p> <p>Small business Mentoring</p> <p>Entrepreneurship Training</p>	<ul style="list-style-type: none"> <li>• <i>Women's Economic Ventures (WEV)</i></li> </ul>
<b>Health/Mental Health Care</b>	<p>Alcohol and Drug Abuse Prevention</p> <p>Alcohol and Drug Abuse Treatment</p> <p>Primary care</p> <p>Dental services</p> <p>Mental Health Services</p> <p>Health Insurance Advising</p> <p>Services for the Aging</p>	<ul style="list-style-type: none"> <li>• <i>Anthem</i></li> <li>• <i>Clinicas Del Camino Real</i></li> <li>• <i>Kids &amp; Families Together</i></li> <li>• <i>New Dawn Counseling and Consulting</i></li> <li>• <i>Tri-Counties Region Admin Office (Every Woman Counts)</i></li> <li>• <i>Ventura County Area Agency on Aging</i></li> <li>• <i>Ventura County Behavioral Health</i></li> <li>• <i>Ventura County Health Care Agency</i></li> <li>• <i>Ventura County Public Health</i></li> </ul>
<b>Crisis Services</b>	<p>Crisis Assessment</p> <p>Crisis Intervention</p> <p>Crisis Management</p> <p>Crisis Resolution</p>	<ul style="list-style-type: none"> <li>• <i>Ventura County Area Agency on Aging</i></li> <li>• <i>Ventura County Behavioral Health</i></li> </ul>
<b>Child/Adult Protective Services</b>	<p>Needs Assessment</p> <p>Case Planning</p> <p>Information Referral</p>	<ul style="list-style-type: none"> <li>• <i>Adult Protective Services and Child Protective Services of Ventura County</i></li> <li>• <i>Interface Children &amp; Family Services</i></li> </ul>
<b>Household Management</b>	<p>Training in Household Management</p>	<ul style="list-style-type: none"> <li>• <i>Westside Community Development Corporation (WCDC)</i></li> </ul>
<b>Homeownership Preparation</b>	<p>Homeownership Education</p> <p>Housing Counseling</p> <p>Down payment Assistance</p>	<ul style="list-style-type: none"> <li>• <i>City of Oxnard- Affordable Housing &amp; Rehabilitation Division</i></li> <li>• <i>Ventura County Community Development Corporation (VCCDC)</i></li> </ul>

	Other Homeownership Assistance	
<b>Financial Empowerment</b>	Financial education Financial coaching Banking services Training in money management Tax Preparation and Filing	<ul style="list-style-type: none"> <li>• <i>Montecito Bank &amp; Trust</i></li> <li>• <i>New York Life Insurance Company</i></li> <li>• <i>United Way of Ventura County</i></li> <li>• <i>Ventura County Community Development Corporation (VCCDC)</i></li> <li>• <i>Ventura County Credit Union (VCCU)</i></li> </ul>
<b>Legal Services</b>	Legal Services Immigration and Citizenship Services	<ul style="list-style-type: none"> <li>• <i>El Concilio Family Services</i></li> <li>• <i>Family Justice Center</i></li> <li>• <i>Mixteco-Indigena Community Organizing Project (MICOP)</i></li> <li>• <i>Ventura Adult &amp; Continuing Education (VACE)</i></li> </ul>
<b>Debt Resolution &amp; Credit Repair</b>	Assistance negotiating the resolution of past-due debt	<ul style="list-style-type: none"> <li>• <i>Money Management International (MMI)</i></li> </ul>
<b>Youth Engagement &amp; Enrichment</b>	Youth Programming Homework Assistance	<ul style="list-style-type: none"> <li>• <i>BikeVC</i></li> <li>• <i>CityKidz</i></li> <li>• <i>EPIC Leadership Center</i></li> <li>• <i>Future Leaders of America (FLA)</i></li> <li>• <i>Project Understanding</i></li> <li>• <i>Ventura Family YMCA</i></li> <li>• <i>Ventura Library</i></li> </ul>
<b>Veteran Resources</b>	Veteran Resources	<ul style="list-style-type: none"> <li>• <i>Salvation Army</i></li> <li>• <i>State of California Dept. of Rehabilitation</i></li> <li>• <i>Ventura County Human Services Agency</i></li> </ul>

## **VIII. Method of Identifying Family Support Needs and Delivering Appropriate Support Services**

### *A. 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 ITSP and signing of the CoP. After enrollment in 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 services such 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.

In accordance with regulations found in 24 CFR §984.203, the HACSB will identify and screen prospective families for the program to determine the types of services required to facilitate family self-sufficiency. The process will include an evaluation through a pre-enrollment questionnaire of educational level,



overall skills, job experience, ability to seek and maintain suitable employment, financial status, biggest challenges, and long-term goals. These factors and needed services will be recorded for evaluation against available support services and assist in the goal planning process that is tailored to the participant's needs for self-sufficiency. This individual assessment initially determines the family's eligibility for the FSS Program. While a participant is on the program, a quarterly survey is required to be submitted from each head of FSS family that updates me on the status of their goals, resources they have obtained, and any also resources they still need. The formal assessments may lead to adjustments to the ITSP, if requested by the family.

#### *B. Delivering Appropriate Support Services*

All families who participate in the FSS program will be assigned an FSS Coordinator who will provide coaching services to help each participating family to:

- Understand the benefits of participating 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 service providers.
- Overcome obstacles in the way of achieving a family's goals.

As explained above, the FSS Coordinator will also mail out a quarterly survey to all program participants four (4) times a year. The survey is intended to be used as a tool for tracking and data measuring used at time of HUD reporting and to track participant progress. Failure to complete the three (3) consecutive quarterly surveys will result in the program termination.

#### *C. Transitional Supportive Service Assistance*

Families that have completed their CoP and remain in assisted housing may request assistance with referrals to service providers to continue their progress toward economic security. Subject to limitations on staff capacity, HACSB will try to help these families with appropriate referrals. The time spent on these referrals will not be covered by funds designated by HUD to support the FSS program.

### **IX. Contract of Participation**

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

This Action Plan amendment dated September 28, 2022, makes changes regarding the HUD final rule released May 2022. All current FSS participants will be required to acknowledge by signing that they

accept the new CoP regarding the latest changes for these new FSS action plan regulations to apply. If the FSS participant wants to remain on the old CoP, the prior FSS action plan regulations would apply.

#### *A. 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 the HACSB, 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.

#### *B. ITSP Goals*

Each FSS participant's ITSP will establish specific interim and final goals by which the HACSB 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, the HACSB 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 collaborate with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

#### *C. Determination of Suitable Employment*

As defined in the FSS regulations (24 CFR §984.303(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 the HACSB, 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.

#### *D. 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. HACSB will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

- Circumstances beyond the control of the FSS family, as determined by the HACSB, such as a serious illness 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 (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 the HACSB; or
- Any other circumstances that the HACSB determines warrants an extension.

The HACSB may modify the CoP end date by approving the extension request from the head of FSS family. The FSS Coordinator will review and make the decision on whether the request is granted or denied. An

extension may be requested by the participant within 12 months of the termination date and must state the reason(s) for the request that is deemed good cause.

Extension of the CoP entitles the participant to continue to accrue escrow credits, if applicable. The HACSB is responsible for evaluating and determining all CoP amendments, modifications, and completions. During exceptional circumstances, a request for an additional waiver to extend past the 2-year extension, will be sent to the HUD field office for approval.

#### *E. 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. The HACSB will accept the following form of verification for completion of the ITSP goals:

The HACSB will require a combination of self-certification and third-party verification to document completion of ITSP goals. Depending on the type of goal that is completed, both paper and electronic documentation will primarily be accepted to meet the requirement of proof of goal completion. This documentation will be filed under "goals met" in each participant's FSS file.

#### *F. Modification*

The HACSB 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 the HACSB as well as the head of FSS family. The HACSB will allow modifications at any time during the term of the CoP, except ITSP modifications within 180 days from the end of the term.

The HACSB will allow for modifications to the CoP under the following circumstances:

1. When the modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency.
2. 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 the HACSB, designated another family member to be the FSS head of family.
3. 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.

#### *G. Consequences of Noncompliance with the Contract*

Participant non-compliance with the CoP may result in termination from the FSS program and forfeit of any escrow funds. See policies on Involuntary Termination in Section X(A). Any participant terminated for cause from the FSS Program will not be allowed to participate in the FSS Program at HACSB in the future. If the participant is terminated for other reasons, not by violating any housing and/or FSS program, the head of FSS family is allowed to request to re-enroll in the FSS program but must wait at least 12 months from when they were exited from the program. If the head of FSS family decides to not re-enroll, but

another adult member of the household wants to enroll, they must wait at least 12 months before requesting to enroll in the program.

## **X. Program Termination, Withholding of Services, and Available Grievance Procedures**

### *A. Program Termination*

#### *Involuntary Termination*

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

1. If the participant fails to meet their obligations under the CoP, the ITSP and related documentation. Non-compliance includes:
  - i. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance;
  - ii. Failure to work on activities and/or goals set forth in the ITSP, including employment activities; or
  - iii. Failure to complete activities and/or goals within the specified time frames
  - iv. Fraud committed by the family.
2. If the participant's housing assistance has been terminated.

Participants who fail to meet their obligations under paragraph 1 listed above, as determined by an FSS Coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned HACSB 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 a 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, text, 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.

FSS contracts and goal plans will be reviewed by the FSS Coordinator within 6 months of an expiring contract and at the time of their housing assistance under question. To prevent termination, the FSS Coordinator will send out notices at least 6 months prior to head of FSS family through mail and/or email reminding the participant of their expiring contract. Once the FSS contract is determined that it will be terminated, a written notice will be sent to the head of FSS family.

### 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.

### *B. 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:

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

### *C. Grievance Procedures*

If the FSS CoP is terminated, the family is often entitled to appeal the decision. Informal reviews are provided for all FSS program participants that are being terminated from the program and follow the same procedures per our HACSB Admin Plan, which includes notifying the FSS program participant with their termination letter (including the reasons for the termination) notifying the participant that they have up to 10 days to request an informal hearing to appeal the FSS contract termination. If a hearing is requested by the FSS family, notification to 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 are not limited to:

- Head of FSS family;
- FSS Coordinator; and

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

If the family does not appear at the scheduled time and was unable to reschedule the hearing in advance due to the nature of the emergency, the family must contact the HACSB within 24 hours of the scheduled hearing date, excluding weekends and holidays. The Hearing Officer will issue a written decision to the family within ten (10) business days after the hearing. The decision made by the Hearing Officer will be final. The HACSB reserves the right to overturn the Hearing Officer's decision only in the event that the decision is contrary to the organization's written policies.

HACSB's PHA Plan details the HACSB's Grievance Procedures (See Chapter 16 Part III: Informal Reviews and Hearings).

#### **XI. 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 the HACSB's decision of whether to admit the family into the HCV or PH 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. HACSB will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.

#### **XII. Timetable**

HACSB implemented its FSS program in 1995 and will continue to implement it per this FSS Action Plan. The FSS program will commence operation as soon as HACSB has received notification of HUD's approval of the Action Plan.

Currently, we have a mandatory FSS program and plan to continue to meet the minimum program size by continuing to enroll at least 10 new families every year (see Estimate of Participating Families). This will be accomplished as discussed in prior sections in this FSS Action Plan (see Outreach Efforts).

Eligible participants shall also be screened to ensure they are active and current program participants, are debt free, have no outstanding balance to the agency and are in good standing. FSS Coordinator is to connect with Property Manager and/or Housing Specialist to verify 'good standing' of eligible participants. The HACSB will not select participants from the housing waiting list.

Participation in the FSS Program will be under the following conditions and after the following events have occurred from the prospective FSS participant:

1. Currently a program participant in our Section 8 or Public Housing and is in good standing
2. Returned an interest brochure and/or virtual interest
3. Connected with the FSS Coordinator to set up an orientation meeting
4. Completed the orientation at which HACSB has screened the family to determine support-services needs and the availability of those services (this action will be considered the first successful completion of a pre-enrollment motivational screening tool)
5. Completed the pre-enrollment questionnaire
6. Reviewed and signed the CoP and ITSP

### **XIII. Reasonable Accommodations, Effective Communications, and Limited English Proficiency**

#### *A. Requests for Reasonable Accommodations*

A person with disabilities may request reasonable accommodations to facilitate 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 accommodations policy. The policy is available online at [www.hacityventura.org](http://www.hacityventura.org).

#### *B. Request for Effective Communications*

A person with disabilities may request the use of effective communication strategies to facilitate participation in the FSS program. Examples include appropriate auxiliary aids and services, such as interpreters, computer-assisted real time transcription (CART), captioned videos with audible video description, visual alarm devices, a talking thermostat, accessible electronic communications and websites, documents in alternative formats (e.g., Braille, large print), or assistance in reading or completing a form, etc. 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 effective communications policy. The policy is available online at [www.hacityventura.org](http://www.hacityventura.org).

#### *C. Limited English Proficiency*

The HACSB will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available online at [www.hacityventura.org](http://www.hacityventura.org).

### **XIV. Coordination of Services**

#### *A. Certification of Coordination*

Development of the services and activities under the FSS program has been coordinated with programs under title I of the Workforce Innovation and Opportunity Act 29 U.S.C. 3111 et seq., and other relevant employment, childcare, transportation, training, education, and financial empowerment programs in the area. Implementation will continue to be coordinated, to avoid duplication of services and activities.

#### *B. Program Coordinating Committee*

The principal vehicle for ensuring ongoing coordination of services is the Program Coordinating Committee (PCC), which has been established in accordance with FSS regulations to assist in securing commitments of public and private resources for the operation of the FSS Program. Among other responsibilities, the PCC will help the FSS program to identify and build strong referral relationships with providers of supportive services that meet the needs of FSS participants. The PCC will also be consulted in developing program policies and procedures.

The PCC is responsible for assisting with the development of the FSS Action Plan policies and procedures. HACSB will assist program participants with supportive services referrals through the PCC. The PCC will assist the HACSB staff to obtain the following support services, in the HACSB's quest for a successful FSS Program: education, employment assistance, childcare referrals, financial and homeownership counseling, credit repair, budgeting, etc.

The PCC will meet at least once a quarter (every 3 months) co-hosting with Oxnard Housing Authority and may conduct business on an as-needed basis via email or telephone conferences. The PCC includes the following representatives: one or more FSS Program Coordinators, one or more participants from each HUD rental assistance program served by the FSS program, and representatives from a variety of agencies and individuals. Currently, we have over thirty (30) active partners that include but are not limited to:

- America's Job Center of CA-Ventura County
- Anthem
- BikeVC
- Boys & Girls Clubs of Greater Oxnard and Port Hueneme
- Center for Employment Training (CET)
- Child Development Inc. (CDI)
- Child Development Resources (CDR)
- City of Oxnard
- City Kidz
- EPIC Leadership Center
- Future Leaders of America (FLA)
- Kids & Families Together
- Mixteco-Indigena Community Organizing (MICOP)
- Montecito Bank & Trust
- New Dawn Counseling and Consulting
- New York Life Insurance Company
- Office of Senator Monique Limon
- Owens Valley Career Development Center
- Oxnard Adult School
- Oxnard College
- Project Understanding
- Salvation Army
- State of California Dept. Of Rehabilitation
- Tri-counties Region Admin Office (Every Woman Counts)
- Unite Us
- United Way of Ventura County
- Ventura Adult & Continuing Education (VACE)
- Ventura College
- Ventura County Area Agency on Aging (VCAAA)
- Ventura County Behavioral Health
- Ventura County Community Development Corporation (VCCDC)
- Ventura County Credit Union (VCCU)
- Ventura County Health Care Agency (VCHCA)
- Ventura County Public Health (VCPH)
- Ventura County Human Services Agency
- Ventura Family YMCA
- Ventura Library
- Ventura Unified School District
- Vista Real Public High School (Learn 4 Life)
- Westside Community Development Corporation (WCDC)
- Workforce Innovation and Opportunity Act (WIOA)
- Women's Economic Ventures (WEV)
- Workforce Development Board of Ventura County (WDBVC)

The HACSB will maintain necessary data on the FSS Program for reporting purposes. Data is to be reported to HACSB staff for programmatic purposes, HUD quarterly and final grant reporting, and to the PCC. Data to be gathered periodically should include number of program participants, new enrollments, total



number of escrow accounts, and total monies in escrow accounts.

## **XV. FSS Portability**

### *A. Portability in Initial 12 months*

FSS participants may not exercise portability within the initial 12 months after signing a CoP.

### *B. Moves into the HACSB's Jurisdiction*

If an FSS participant moves into HACSB's jurisdiction, they will be admitted in good standing into the HACSB's FSS program unless the HACSB is already serving the number of FSS families identified in this FSS Action Plan and determines that it does not have the resources to manage the FSS contract.

Regardless of whether HACSB is able to receive an incoming family from another jurisdiction into the FSS program, HACSB will agree to allow and support porting families to remain in their initial PHA's FSS program after porting housing vouchers if the initial PHA requests that the family remain in the initial FSS program and can demonstrate the family is able to fulfill its responsibilities under the initial CoP, the move in jurisdictions notwithstanding.

If a family that was not an FSS participant at the initial PHA but wants to enroll in HACSB's FSS program, when HACSB bills the initial PHA (only if the initial PHA agrees), the initial PHA manages the participant's FSS file, including the escrow calculations that are manually calculated based off the portability paperwork (52665). If the FSS family is on the FSS program at the initial PHA, the CoP executed by the initial PHA will be terminated and a new CoP will be executed with HACSB, including the same dates and baseline information as on the original FSS contract.

### *C. Moves out of HACSB's Jurisdiction*

If the receiving PHA is absorbing, then upon acceptance into the receiving PHA's FSS Program, a transfer of the FSS family's file will be sent to the receiving PHA's FSS Coordinator to maintain the CoP and escrow funds in the family's FSS account. If it is the best interest of the FSS family, HACSB will graduate the family, if they are eligible, prior to porting the family.

### *D. FSS Termination with Disbursement for Porting Families*

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, the HACSB will closely examine the family's progress to determine if it would be appropriate to exercise FSS termination with disbursement as discussed above in the section on termination. When termination is the only option, HACSB will clearly notify the family in writing that the move will result in the loss of escrow funds.

Where continued FSS participation is not possible, HACSB will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR §984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS program.

**XVI. Other Policies**

<b>Policy</b>	<b>Where Addressed</b>
(i) Policies related to the modification of goals in the ITSP	Section IX. Contract of Participation
(ii) The circumstances in which an extension of the CoP may be granted	Section IX. Contract of Participation
(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds	Section VI. FSS Escrow Account and Other Incentives for Participants
(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing	Section VI. FSS Escrow Account and Other Incentives for Participants
(v) Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating	Section IV. Family Selection Procedures
(vi) Policies on requirements for documentation for goal completion	Section IX. Contract of Participation
(vii) Policies on documentation of the household's designation of the "Head of FSS Family"	Section IV. Family Selection Procedures
(viii) Policies for providing an FSS selection preference for porting families	Section IV. Family Selection Procedures

*A. Other Policies*

Family Unification Program (FUP) for Aged Out Foster Youth

HACSB has been approved to participate in the Family Unification Program (FUP) and FSS Demonstration pursuant to Notice PIH 2016-01 to evaluate the effectiveness of combining Housing Choice Vouchers (HCV) for eligible youth lacking adequate housing under the FUP with assistance under the FSS program. The purpose of the demonstration is to increase the opportunities for housing youth with support to achieve self-sufficiency.

Therefore, program size does not need to be amended as the FUP voucher amount falls within the grant program size. HACSB currently administers the FUP program and currently has an allocation of twelve (12) FUP vouchers (9 are for families and 3 are for aged out foster youth).

Youth recruitment will continue through a referral process with the Ventura County Human Services Agency, Homeless Services department. FUP/FSS program participants will adhere to the same requirements and expectations outlined in this FSS action plan, which includes policies concerning family selection procedures and motivation selection factors.

FUP participants will be referred through the Ventura County Human Services Agency, Homeless Services department. Referrals will be screened through the HACSB HCV Program to ensure they meet program qualifications. If given a FUP voucher, FSS Coordinator will be present at time of lease-up briefing to

describe the FSS program. If FUP participants decides to participate in the FSS program, the FSS contract will be executed at time of briefing. FSS Coordinator will follow up with FUP voucher holders who decide not to enroll in the FSS program at time of lease-up later to verify if intentions to enroll in program have changed. The FUP youth and HACSB may enter into a CoP at any time and may receive an extension of their voucher assistance if the execution date of the CoP is prior to the expiration of their FUP voucher, even if the effective date of their CoP falls after the expiration of their FUP voucher. FUP voucher holders that decide to join FSS will continue to have housing assistance while participating on the FSS program. FUP voucher holders that decide to opt out of joining the FSS program only have limited housing assistance for a total of 36 months maximum.

## **XVII. Definitions**

The definitions below are specified in 24 CFR §984.103. The terms 1937 Act, Fair Market Rent, Head of Household, HUD, Public Housing, Public Housing Agency (PHA), Secretary, and Section 8, as used in this part, are defined in 24 CFR Part 5.

1) *Certification* means a written assertion based on supporting evidence, provided by the FSS family or the HACSB, as may be required under this part, and which:

- a. Shall be maintained by the HACSB in the case of the family's certification, or by HUD in the case of HACSB's or owner's certification;
- b. Shall be made available for inspection by HUD, the HACSB and the public, as appropriate; and,
- c. Shall be deemed to be accurate for purposes of this part, unless the Secretary or the HACSB, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

2) *Contract of Participation (CoP)* means a contract, in a form with contents approved by HUD, entered between an FSS family and a HACSB operating an FSS Program that sets forth the terms and conditions governing participation in the FSS Program. The CoP includes all ITSPs entered between the HACSB and all members of the family who will participate in the FSS Program, and which plans are attached to the CoP as exhibits. For additional detail, see 24 CFR §984.303.

3) *Effective date of Contract of Participation (CoP)* means the first day of the month following the date in which the FSS family and HACSB entered the CoP.

4) *Eligible families* means current residents of Public Housing (Section 9) and current Section 8 program participants, as defined in this section, including those participating in other local self-sufficiency programs.

5) *Enrollment* means the date that the FSS family entered the CoP with the HACSB.

6) *Family Self-Sufficiency (FSS) Program* means the program established by HACSB within its jurisdiction or by an owner to promote self-sufficiency among participating families, including the coordination of supportive services to these families, as authorized by section 23 of the 1937 Act.

7) *FSS escrow account (or, escrow)* means the FSS escrow account authorized by section 23 of the 1937 Act, and as provided by 24 CFR §984.305.

8) *FSS escrow credit* means the amount credited by the HACSB to the FSS family's FSS escrow account.

9) *FSS family* means a family that resides in Public Housing (Section 9) or receives Section 8 assistance or receives HUD Project-Based Rental Assistance for a privately owned property, and that elects to participate in the FSS Program, and whose designated adult member (head of FSS family), as determined in accordance with 24 CFR §984.303(a), has signed the CoP.

10) *FSS family in good standing* means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the HACSB; and is in compliance with the regulations regarding participation in the relevant rental assistance program.

11) *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" set forth in this 24 CFR §984.103.

12) *FSS slots* refers to the total number of families (as determined in the Action Plan and, for mandatory programs, in 24 CFR §984.105 of this part) that HACSB will serve in its FSS Program.

13) *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.

14) *FY* means Federal Fiscal Year (starting October 1 and ending September 30, and year designated by the calendar year in which it ends).

15) *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.

16) *Individual Training and Services Plan (ITSP)* means a written plan that is prepared by the HACSB in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

- a. The final and interim goals for the participating FSS family member;
- b. The supportive services to be provided to the participating FSS family members;
- c. The activities to be completed by that family member; and,
- d. The agreed upon completion dates for the goals and activities.

Each ITSP must be signed by the HACSB 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.

17) *Owner* means the owner of multifamily assisted housing.

18) *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 escrow account funds.

19) *Supportive services* mean those appropriate services that HACSB will coordinate on behalf of an FSS family under a CoP, which may include, but are not limited to:

- a. *Childcare*—childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- b. *Transportation*—transportation necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment;
- c. *Education*—remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;
- d. *Employment Supports*—job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;
- e. *Personal welfare*—substance/alcohol abuse treatment and counseling, and health, dental, mental health, and health insurance services;
- f. *Household management*—training in household management;
- g. *Homeownership and housing counseling*— homeownership education and assistance and housing counseling;
- h. *Financial Empowerment*—training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing, and improving credit scores, etc.;
- i. *Other services*—any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD’s legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act.

20. *Welfare assistance* means (for purposes of the FSS program only) income assistance from Federal, (i.e. Temporary Assistance for Needy Families (TANF) or subsequent program) State, or local welfare programs and includes only cash maintenance payments designed to meet a family’s ongoing basic needs. Welfare assistance does not include:

- a. Nonrecurrent, short-term benefits that:
  - (i) Are designed to deal with a specific crisis or episode of need;
  - (ii) Are not intended to meet recurrent or ongoing needs; and,
  - (iii) Will not extend beyond four months.
- b. Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- c. Supportive services such as childcare and transportation provided to families who are employed;
- c. Refundable earned income tax credits;
- d. Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF);
- e. Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;
- f. Amounts solely directed to meeting housing expenses;
- g. Amounts for health care;
- h. Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;

- i. Supplemental Security Income, Social Security Disability Income, or Social Security; and
- j. Child-only or non-needy TANF grants made to or on behalf of a dependent child solely based on the child's need and not on the need of the child's current non-parental caretaker.