



Connecting people to homes, hope and opportunity. Jennifer Westermann, CEO

FSS Action Plan

**Housing Opportunities of SW Washington
Family Self-Sufficiency Program
Approved September 20 2022**

FSS Action Plan

Table of Contents

Family Self-Sufficiency Program Overview		3
1.	Purpose	4
2.	Affirmatively Furthering Fair Housing	5
3.	Family Demographics	6
4.	Supportive Service Needs of Families Expected to be Served	7
5.	Estimate of Participating Families to be Served	7
6.	FSS Selection Procedures	7
7.	Incentives to Encourage Participation	8
8	Escrow Account	9
9.	Outreach Efforts	12
10.	Activities and Supportive Services	12
11.	FSS and Section 8 Homeownership Program (HOP)	13
12.	Method for Identification of Family Support Needs	13
13.	Assurances of Non-Interference with Rights of Non-Participating Families	14
14.	Certification of Coordination	14
15.	Contract of Participation Extension	14
16.	Program Termination	15
17.	Timetable for Program Implementation	16

FAMILY SELF-SUFFICIENCY FSS PROGRAM OVERVIEW

The Family Self-Sufficiency Program (FSS) was established by the United States Department of Housing and Urban Development (HUD) in 1990 by Section 554 of the National Affordable Housing Act. It is a successor program to Project Self-Sufficiency and Operation Bootstrap. FSS built upon and refined both Project Self-Sufficiency and the bootstrap program. It remained a voluntary program in 1991 and 1992 but became mandatory in 1993 for any new increments of funding issued to PHAs.

Public Housing Authorities (PHAs) were required to administer FSS programs if they received funding for additional certificates or vouchers in FY 1993 or subsequent years through October 21, 1998. As a result of the Public Housing Reform Act of 1998, funding received after October 21, 1998, no longer mandates an increase in the minimum size of a PHA's FSS program, and Housing Opportunities of SW Washington's (HOSWWA) FSS program size was reduced by one for each FSS participant that graduated.

APPLICABLE REGULATIONS

Applicable regulations for public housing and HCV FSS programs include:

- (1) 24 CFR Part 5: General Program Requirements
- (2) 24 CFR Part 8: Nondiscrimination
- (3) 24 CFR Part 902: Public Housing Assessment System
- (4) 24 CFR Part 903: Public Housing Agency Plans
- (5) 24 CFR Part 945: Designated Housing
- (6) 24 CFR Part 960: Public Housing Admission and Occupancy Policies
- (7) 24 CFR Part 965: PHA-Owned or Leased Projects—General Provisions
- (8) 24 CFR Part 966: Public Housing Lease and Grievance Procedures
- (9) 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- (10) 24 CFR Part 984: Section 8 and Public Housing Family Self-Sufficiency Program

1. PURPOSE

The FSS Program objective is to enable and empower low-income families to become economically self-sufficient from government-assisted welfare programs. FSS is available to HOSWWA Section 8 Housing Choice Voucher program participants including those in Project Based units. Additional objectives of the FSS program are to:

- Improve coordination of planning and delivery of community services to FSS participants based on the commitment to make families self-sufficient.
- Implement a case management system to identify needs, planning and delivery of services to a FSS family based on the family's commitment to becoming self-sufficient.
- Network with other agencies to achieve high quality and comprehensive service delivery to all members of a family with long-term results. Assess the accountability of the family and ensure that families are receiving necessary services from partner agencies.

The family must comply with all HCV rules and regulations to remain eligible for the FSS program. If an FSS family's housing assistance is terminated for any reason, their FSS contract is automatically terminated. Also, the escrow account will be forfeited.

A participant in the FSS Program can expect:

- Personal one-on-one assistance and encouragement from their FSS Coordinator (FSSC).
- Referrals to local service agencies and resources in the community.
- An escrow savings account (for qualifying households) that increases as a family's household earned income increases.

The FSS program is a "*team effort*" between the participant, their FSS Coordinator (FSSC), and the many local service agencies that provide resources for education, job search, counseling, homeownership, and other valuable resources.

2. AFFIRMATIVELY FURTHERING FAIR HOUSING

It is HOSWWA's objective to promote fair housing and the opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice. We will continue to ensure equal opportunity and affirmatively further fair housing through the following actions:

- Annually review and revise information that is distributed to applicants, tenants, and program participants who contact this office wanting tenant/landlord and fair housing assistance.
- Ensure that HOSWWA staff attend annual Fair Housing training to better understand the law so that accurate technical assistance can be provided.
- Market all programs to all eligible persons including persons with disabilities and persons with limited English proficiency.
- Provide fair housing counseling referrals to fair housing agencies.
- Inform participants how to file a fair housing complaint, including sharing with them the Housing Discrimination Hotline.

3. FAMILY DEMOGRAPHICS

The following family demographics provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data) of HCV participants. The data table below may be used to identify supportive service needs of the families expected to participate in the FSS Program.

YARDI Resident Characteristic Report as of 07/2022		
	Total Families	Percent of Total
All Families		
Single	925	76
Female HOH	274	23
Male HOH	18	1
Race		
White	1108	91
Black/African American	37	3
American Indian or Alaska Native	24	2
Asian	24	2
Native Hawaiian/Other Pacific Islander	12	1
All other combinations	12	1
Ethnicity		
Hispanic or Latino	49	4
Not Hispanic or Latino	1168	96
Income		
Extremely Low-Income	942	77
Very Low-Income	238	20
Low Income	33	3
Avg family income	13,740	
Families with TANF	1022	84
Families with wages	170	14
Family Size		
1-2	974	80
3-5	219	18
6 or more	24	2
Persons with Disabilities		
HOH Person w/Disabilities	931	76

4. SUPPORTIVE SERVICE NEEDS OF FAMILIES EXPECTED TO BE SERVED

Families interested in the FSS program will complete an assessment to identify which supportive services will benefit the family

The local needs of our participants are continually assessed and are as follows:

- Employment skills (resumes, cover letters, interview skills)
- Job training
- Education
- Career and educational counseling
- Personal and alcohol/drug dependency counseling
- Childcare
- Transportation
- Health care
- Financial management and budget planning
- Home ownership seminars and counseling
- Credit repair/financial education

Working cooperatively with Work First (TANF), Work Source, Goodwill, and the local Community Action Program (CAP), HOSWWA's FSS program can assist families with career counseling and training needs through federal and local employment opportunities, as well as other Job Training Partnership Act (JTPA) funded programs. HOSWWA will assist family with referral to GED or High School completion classes, college financial aid programs, and childcare assistance.

5. ESTIMATE OF PARTICIPATING FAMILIES SERVED

HOSWWA can reasonably expect to serve 75 FSS participants. To keep participation steady, HOSWWA will allow five additional slots as needed to plan for upcoming graduates, early completions, terminations, or other circumstances.

6. FSS SELECTION PROCEDURES

Selection for the FSS program will not be based in any manner upon the participant's race or color, national origin, religion, sex, familial status, or disability. Selection is based solely upon a minimum level of demonstrated motivation. The focus of the FSS Program is employment of the head of the FSS family.

Participants will be selected from current HCV residents. They will complete an assessment packet and receive a program overview by an FSS Coordinator. Completion of the assessment packet will satisfy the minimum level of demonstrated motivation. Interested participants will be required to sign a Contract of Participation. If HOSWWA has a greater response than available FSS slots, a waiting list will be established to enroll FSS participants according to the order in which they sign up.

7. INCENTIVES TO ENCOURAGE PARTICIPATION

Motivational support, goal setting, and establishing an FSS escrow account will be key incentives to encourage participation. The FSSC will work with each participant to develop an Individual Training and Service Plan (ITSP) designed to help the family achieve financial independence.

A. FSS Contract of Participation

An FSS Contract of Participation (CoP) setting forth provisions of the FSS program and obligations of the family will be signed by the Head of FSS Family. The head of the FSS family will be designated by the participating family. The Head of FSS Family is not required to be the head of the household for purposes of determining income eligibility and rent. The designation or any changes by the household to the Head of FSS family must be submitted to HOSWWA in writing. The Head of FSS family may be changed at any time during the CoP. The family must fulfill the CoP obligations no later than 5 years after the first re-examination of income after the execution date of the CoP.

The Head of FSS Family will be accountable for the FSS Contract of Participation and completing their ITSP. Family members who are not the FSS Head of household but over the age of 18, may establish their own Individual Training and Services Plan (ITSP) that is incorporated into the FSS Head of Household's COP. The Head of FSS Family is required to be suitably employed to complete the FSS Contract of Participation. 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 HOSWWA, 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.

B. Individual Training and Services Plan (ITSP)

The ITSP is the written plan prepared for the head of the FSS family and each adult member of the family who elects to participate in the FSS Program. The ITSP sets forth the resources and supportive services to be provided to each participating family member, the activities to be completed by that family member, and the agreed upon completion dates for the services and activities. The ITSP will include interim and long-range goals.

- A final goal must include obtaining and maintaining suitable employment specific to the individual's skills, education, and job training and the available job opportunities in the area.
- For each participant who is a recipient of welfare assistance, a goal must be established that the family will become independent from welfare assistance, as defined by HUD regulations for Family Self-Sufficiency, and remain independent from welfare assistance at the point of the expiration of the term of the FSS Program Contract of Participation, including any extension thereof.

C. Modification of Goals

HOSWWA will allow modifications to the ITSP at any time during the term of the CoP. The FSSC will assess and reassess the plan regularly with the participant. Modifications will be made to the Individual Training and Services Plan as goals change to promote self-sufficiency. Modifications to the ITSP must be approved by the FSSC.

Monitoring progress of individual participants will be the responsibility of the FSSC. FSSC will have at least quarterly contact with each client thereafter to ensure the FSS participant is progressing through the Individual Training and Services Plan. The FSSC will maintain contact by phone, email, appointments, or written communication.

D. Verification of Completion of Goals

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. Housing Opportunities of SW Washington will accept the following form of verification for completion of the ITSP goals:

Housing Opportunities of SW Washington will accept self-certification to document completion of ITSP goals.

8. ESCROW ACCOUNT

HOSWWA will establish an escrow account for the FSS participant when the family's Total Tenant Payment increases due to an increase in earned income. HOSWWA will use HAP funds paid by HUD for the FSS Escrow Account. A detailed description of the Escrow account will be given during the initial information session. FSS participants will receive an annual statement of the Escrow Account balance. Families will receive the full sum of the Escrow Account upon successful completion of FSS contracts.

A. Calculating Escrow

The FSS Credit amount shall be the lower of:

- Thirty percent of one-twelfth of the amount by which the family's current income exceeds the family's baseline income; or
- The increase in the family's monthly rent. The increase in the family's monthly rent shall be the lower of:
 - The amount by which the family's current monthly rent exceeds the family's baseline monthly rent; or
 - For HCV Families, the difference between the baseline monthly rent and the current gross rent (i.e., rent to owner plus any utility allowance) or the payment standard, whichever is lower

If family has income disregarded due to Earned Income Disallowance, Jobs Plus Earned Income Disregard or any other self-sufficiency income disregard, that income is included in the baseline. This doesn't change the amount the family has to pay in rent, it just sets the baseline, so the escrow doesn't start until they are paying the full income-based rent and then increase.

B. Withdrawal from Escrow Account Prior to Completion of Goals

As an additional incentive component to the FSS escrow account, families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP). Requests may be made verbally or in writing. Requests may be made throughout the term of the Contract of Participation. 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. Request for interim 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 HOSWWA. 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.

Escrow funds cannot be used to pay bills, repair automobiles (unless the vehicle is needed for employment purposes), or for personal uses. Requests for interim withdrawals for less than \$2500 will be approved on a case-by-case basis by the FSS Coordinator. A minimum withdrawal of \$100 is required. Any requests more than \$2500 will be approved by the Rent Assistance Programs Manager and FSS Coordinator on a case-by-case basis. Clients should be over 50% of the way to their final goal. Success level will be demonstrated by a signed statement from their FSS Coordinator. Clients may withdraw no more than 50% of their current FSS escrow balance. Checks will be made out to the client and creditor.

C. Homeownership Escrow Interim Withdrawals

Clients involved in the Home Ownership Program can withdraw up to 100% of their escrow for the following: During purchasing and moving in, expenses related to purchasing, moving into, or furnishing a home are permitted up to 60 days after purchase date. After moving in, expenses related to home repairs, maintenance, or paying ahead on a mortgage are permitted once every 6 months. One withdrawal could include 2 or more checks. In the case of emergency essential repairs or replacements for the home, the limit of one withdrawal in 6 months will not apply. A budget for home remodels must be approved before interim withdrawals can be made for home remodel expenses. Reimbursements or payments on approved budget items under that remodel will be permitted once a month.

Requests for interim withdrawals for Homeownership participants will be approved on a case-by-case basis by the FSSC/HOPC and must be accompanied by invoices indicating whether the cost has been paid yet, a cost proposal or estimate.

D. Use of Forfeited Funds

In the event that a family is not eligible to receive their escrow disbursement, the forfeited escrow shall be placed in an account and used for the following purposes:

- Support for FSS participants in good standing, including, but not limited to, transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP;
- Training for FSS Program Coordinator(s); or
- Other eligible activities as determined by HUD regulation.

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 HUD regulation.

9. OUTREACH EFFORTS

To recruit participants for the FSS program, staff utilizes various outreach efforts including but not limited to written notices, flyers, newsletters, verbal presentations, brochures, and the HOSWWA website at www.hoswwa.org.

FSS information flyers are added to the briefing packet given to all new HCV participants. HQS Inspectors also promote FSS during inspections. FSS brochures and an FSS information board are on display in the HOSWWA office lobby. Housing Specialists and Support Technicians refer potential participants during regular interactions.

FSS staff will conduct presentations as needed to market the program to the local community, businesses, and service organizations. Information is available in other languages as needed.

10. ACTIVITIES AND SUPPORTIVE SERVICES

Activities and supportive services to be coordinated behalf of the participating family include:

Supportive Service Category	Specific Service	Source/Partner
Needs Assessment	Vocational Assessment Educational Assessment	Dept of Vocational Rehabilitation Lower Columbia College
Childcare	Early Childhood Care Afterschool Care Childcare Subsidy	The Progress Center (Longview) ECEAP/Head Start DSHS
Transportation	Bus passes	Tri-Cities Transportation
Education	High School Equivalency/GED English as a Second Language Post-secondary certificates Advanced Degrees	Goodwill Lower Columbia College or other community college
Skills Training	Work Study Basic Skills Training On-the-Job Training Apprenticeships Skilled Labor training	Goodwill WorkSource Lower Columbia College or other community college
Job Search Assistance	Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement	Goodwill WorkSource

Child/Adult Protective Services	Needs Assessment Case Planning Information Referral	SW WA Agency on Aging and Disabilities DCYF
Homeownership Preparation	Homeownership Education Housing Counseling Downpayment Assistance Other Homeownership Assistance	HOSWWA WSHFC
Financial Empowerment	Financial education Financial coaching Banking services Training in money management Credit Repair & Debt Resolution	WorkSource FDIC
Legal Services	Legal Aid/Services	CW Legal Aid NW Justice Thurston County Volunteer Legal Services

11. FSS and SECTION 8 HOMEOWNERSHIP PROGRAM (HOP)

When an FSS family shows interest in purchasing a home through the Homeownership Program (HOP), the FSSC will include HOP eligibility requirements in their family's goals. HOP is available to HOSWWA clients who choose to participate.

The FSS Coach will keep a Family FSS file and will require the family to be in contact with their FSS Coach as well as their HOP Coordinator. The FSS Coach will set goals to attend First Time Homebuyer Class and follow through with HOP requirements to purchase the home. Goals will include budgeting, savings for emergency fund, maintenance issues, and other goals that encourage self-sufficiency for the success of homeowner.

If the family qualifies for a secondary Homeownership Program (Habitat for Humanity, or Lower Columbia CAP Rehab Homeownership Program) the family will be encouraged to keep the FSS Coach, HOP Coordinator and other Housing Program Coordinator informed of their progress. The family must continue to check in at a schedule established with their FSS Coach

The FSS family will continue with FSS until they have completed their five-year contract with the FSS Program.

12. METHOD FOR IDENTIFICATION OF FAMILY SUPPORT NEEDS

Using the Application/Assessment tool, the FSSC will assess the family's barriers and present needs, provide personal and vocational assistance to the extent possible, assist the participant in developing and setting goals with timelines, and provide other information and referrals as needed.

13. ASSURANCES OF NON-INTERFERENCE WITH RIGHTS OF NON-PARTICIPATING FAMILIES

A family's election to not participate in the FSS program will not affect the family's admission to, or continued participation in the Section 8 HCV program, or the family right to occupancy in accordance with its lease. This assurance will be clearly stated on all FSS applications as well as in any outreach documentation.

14. CERTIFICATION OF COORDINATION

HOSWWA certifies that the development of the services and activities under the FSS program has been coordinated with programs provided under the JTPA, and other relevant employment/education/training programs. This coordination of services extends to transportation, childcare and other services in Cowlitz County, Pacific County, Lewis County, and Wahkiakum County. Implementation will continue to be coordinated to avoid duplication of services.

HOSWWA certifies that an FSS Program Coordinating Committee was established prior to development of the original Action Plan to assist in development and implementation of the program.

Community Resource Providers (CRP) made up of Community Partners from Pacific, Wahkiakum, Lewis, and Cowlitz counties meets bi-monthly to share community events and resources that will encourages our FSS Participants to thrive.

15. CONTRACT OF PARTICIPATION EXTENSION

HOSWWA shall in writing, extend the term of the contract of participation for a period not to exceed two years for any FSS family that requests, in writing, an extension of the contract, provided that the PHA finds that good cause exists for granting the extension. The family's written request for an extension must include a description of the need for the extension. "Good Cause" means circumstances beyond the control of the FSS family, as determined by the PHA.

Receiving an extension of the contract of participation will entitle the FSS family to continue having monthly escrow deposits credited to the family's FSS account.

16. PROGRAM TERMINATION

Reasons for Termination

FSS participants shall be subject to FSS contract terminations and withholding of services while maintaining housing assistance for the following reasons:

- Failure of the family, or a member of the family, to honor the terms of the contract,
- Mutual consent of the parties
- Expiration of the contract term and any extension thereof
- Termination of HCV assistance in accordance with 24 CFR 982
- The family moves outside HOSWWA's jurisdiction under portability procedures before one year on the FSS Program, or the family's FSS participation is not accepted by the receiving PHA, or the family moves out of jurisdiction for non-employment or education self-sufficient goals.

HOSWWA will not terminate an FSS family's participation in HCV if their FSS Contract of Participation is terminated.

Process of Termination and Grievances

Families being terminated from FSS will be issued an FSS termination letter. The FSS termination letter will state the reason for the termination of their FSS participation. The family may request an informal review to dispute the decision to terminate the contract. The informal review must be requested within fourteen (14) business days of the date of the FSS termination. The informal review shall be scheduled in a timely manner and shall be conducted by the department manager on the date mutually agreed to by HOSWWA and the family.

If the informal review attempt at resolution proves to be unsatisfactory or unsuccessful, a complainant may request a formal hearing with a hearing officer. A grievance hearing shall be held at the request of the FSS head of household to determine if services and/or the FSS Contract of Participation should be terminated. A Hearing Officer as directed by HOSWWA will facilitate the hearing and be responsible for ensuring adequate information is brought out in the hearing process so an informed decision can be reached.

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

The purpose of the grievance hearing is to reach a decision whether to terminate services and/or the FSS Contract of Participation. The final decision will be made by the Hearing Officer of the Housing Authority.

Re-Enrollment

HCV participants who were former FSS participants, and were terminated from the program, can request to re-enroll in FSS in writing. Participants must meet with the FSSC, Coach, and direct supervisor and provide evidence to show they are ready to reengage before signing a new CoP. The family can return to the program per waiting list procedure.

HCV participants who were former FSS participants, and graduated from the program, are not eligible to re-enroll in FSS.

17. TIMETABLE FOR PROGRAM IMPLEMENTATION

There is no deadline for implementation of a voluntary program. As of September 2012, HOSWWA's FSS program has completed the 153 mandatory slots and is now a 75-slot voluntary program.