



9/8/2022

FSS Action Plan 2022

Franklin County Regional Housing
and Redevelopment Authority and
Greenfield Housing Authority



Kim Scammon, MPH
FAMILY SELF-SUFFICIENCY COORDINATOR

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Abbreviations:

AMI: Area Median Income

COP: Contract of Participation

FRCOG: Franklin Regional Council of Governments

FSS: Family Self-Sufficiency Program

GHA: Greenfield Housing Authority

HCV: Housing Choice Voucher Program

HOH: Head of Household

HRA: Franklin County Regional Housing and Redevelopment Authority

ITSP: Individual Training and Service Plan

PHA: Public Housing Authority

Introduction

Greenfield Housing Authority and Franklin County Regional Housing and Redevelopment Authority are both located in Franklin County, Massachusetts, the most rural county in the Massachusetts with a population of approximately 70,000 people. Between the two PHA's there are approximately 1038 voucher holders, 1.5% of the county's residents. There are HCV holders who reside outside of Franklin County, most notably in Hampshire and Hamden Counties in the Pioneer Valley.

The Family Self Sufficiency (FSS) program was established by Congress in 1990 by the George H. W. Bush Administration and HUD Secretary Jack Kemp. The purpose of the FSS program is to "promote the development of local strategies to coordinate the use of Department of Housing and Urban Development (HUD) assistance with public and private resources, to enable families eligible to receive HUD assistance to achieve economic independence and self-sufficiency."

In 1992 GHA and HRA implemented the FSS program jointly for the residents of Franklin County under one grant and will continue to implement it per this Action Plan. Both PHA's are committed to providing case management and resources to participants in a trauma-informed manner using peer-reviewed best practices for engaging with and motivating low-income individuals and families.

The FSS program will be administered in accordance with 24CFR984.201 as well as organizational personal policies. The Action Plan was submitted to HUD on _____.

Family Demographics

The combined GHA and HRA number of vouchers is approximately 1143. Currently, 1038 are leased up.

Median Age

Female	53.56
Male	54.67

Race and Ethnicity

Non-Hispanic	89.88%
Hispanic	8.76%
White	95.76%
Black/African American	5.3%
Asian	<1%
American Indian/Alaska Native	<1%
Native Hawaiian/Pacific Islander	0
Other	<1%
Declined	<1%

Income

Extreme Low (30% AMI)	77.75%
Very Low (50% AMI)	17.15%
Low (80% AMI)	4.05%

Other:

Elderly	32.27%
Non-Elderly	66.67%
Disabled	67.05%
Non-Disabled	32.08%
Number of Households	1038
Families with Children	211
Total Number of children	376

Program Size

GHA and HRA participate in a voluntary FSS program. Our minimum program size is 25 participants. One FSS case manager may carry a case load of 75 participants. Once the FSS program has reached 75 participants a waiting list will be established.

In order to maintain a robust FSS program, the FSS Coordinator will continue to outreach to the potential FSS participants as outlined in Outreach Efforts Section.

Historically, the GHA/HRA FSS program has averaged 5 new participants a year. Over a five-year period, this FSS program can expect to serve a minimum of 50 participants.

FSS Family Selection Process

All HVC holders are eligible and welcome to participate in the FSS program. Although it is ideal for all HCV holders to participate in the FSS program, not all HCV holders have the desire to participate. Because the FSS Program is voluntary, not participating in the program will not have a negative effect on a tenant's HCV voucher.

Potential FSS participants will be enrolled in the program on a first-come, first-served basis. Any adult over the age of 18 who is willing and able to work and is motivated to achieve financial goals may participate in the FSS Program. There can be only one Head of Household for the FSS program, though, any adult can have an ITSP. The Head of the FSS household does not need to be the same as the rent/Section 8 (HCV) Head of Household. It is up to the family to designate the FSS Head of Household. By signing the COP, the family member who signs the COP becomes the FSS HOH. Additionally, the FSS HOH will have to sign the FSS Family Designation of Head of Household Form. In order to switch the FSS HOH, the current FSS HOH and the pending FSS HOH will need to submit a notarized affidavit requesting the change in HOH. Changing the HOH will not change the end date of the COP.

The GHA/HRA FFS program will utilize motivational screening as follows. When someone initiates contact with or is referred to the FSS Case Manager they will be given three

opportunities to meet with the case manager. After each missed appointment, the case manager will contact the potential participant to re-schedule the appointment if they have not contacted the case manager within 24-48 hours to re-schedule the appointment. The case manager will not reach out after the third missed appointment. If someone reaches out again who was previously unsuccessful in meeting with the FSS case manager, they will be given the same opportunity, again. If, however, after three attempts (for a total of 9 missed appointment) to successfully met with the FSS case manager, has not resulted in a meeting, the case manager will not reach out if the potential client does not make the next scheduled appointment.

Participants in the following voucher programs are eligible for the FSS program:

- Mainstream Vouchers (GHA and HRA)
- Emergency Vouchers (HRA)
- Housing Choice Vouchers, HRA and GHA)

Outreach will be the same for all voucher types.

Current Homeownership Program participants may join the FSS program.

The Homeownership Program is no longer admitting new participants.

The FSS program does not have any admissions preferences, participants will be enrolled on a first come first served basis. If the program is closed because the maximum capacity has been reached, a waiting list will be established. Families on the wait list will be invited to join the program on a first-come first-served basis. A list of wait listed families will be maintained by the FSS Coordinator with the following information:

- Name
- Contact information
- Date and time family-initiated contact with the FSS program

The wait list will be opened when the FSS program enrollment reduces through a combination of graduations, ports, withdrawals, and terminations to 74 participants.

It is the policy of GHA and HRA to comply with all Federal, State, and local nondiscrimination laws and regulations including but not limited to the Fair Housing Act, Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. No person shall be excluded from participation in, be denied benefits of, or otherwise be subjected to discrimination under the FSS program on the grounds of:

- Race
- Color
- Religion
- Perceived Gender or gender identity
- Familial statues
- National or Ethnic Origin
- Sexual orientation

- Age
- Sex
- Source of income
- Disability Status
- Native Language (aka, ESL status)

Upon request to the FSS Coordinator, reasonable accommodations, including effective communication strategies and modifications will be made on a case-by-case basis in order to meet the needs of all potential FSS participants and the accommodation will continue when an individual becomes an FSS participant, including the use of translation services, for those with limited English proficiency.

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

Incentives to Join FSS Program (see Definitions for more detail)

- Case Management
- Escrow Account
- Resource Referral
- First Time Homebuyer Program
- Interim Escrow Disbursement
- Forfeited Funds Account Disbursement

Outreach Efforts

- FSS Program Brochure
- Community Engagement and Outreach
- GHA and HRA website with link to interest form and brochure
- FSS Coordinator to attend Housing Choice Voucher Briefings
- FSS brochure in lease up and annual recertification packets
- FSS poster to be sent with income rent recertification
- When an Oak Courts or Winslow resident gets a notification they have an HCV, the FSS Coordinator will be notified
- Outreach materials to be translated based on local language preferences, as needed
- Participation in committees and coalitions that support the advancement of economic self-sufficiency for our population including but not limited to:
 - Franklin County Resource Network¹
 - Transportation
 - Food Security
 - Affordable Housing
 - Education
 - Digital Literacy
 - Financial Literacy
 - Workforce Development, including education and childcare

¹ Alternative PCC

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

Family Self-Sufficiency Activities and Supportive Services

Each individual and family comes to the FSS program with unique strengths and growing edges that need support. The GHA/HRA FSS program goal is to provide the right resource at the right time in order to support our participants in their journey toward greater self-sufficiency. Supportive services offered to program participants are based on the findings of local needs assessments including the FRGOG's Community Health Improvement Plan 2021-2023 and Baystate Franklin Medical center's Community Benefits Strategic Implementation Plan 2020-2022 in addition to the participants' profile.

Below is a list of public and private services which are currently offered to FSS participants on an as needed basis. The services listed below are primarily based in Franklin County, although many of the providers provide services throughout the Pioneer Valley. Every attempt will be made to connect participants to resources, the FSS program has not liability to the family if the services are not provided. Whenever possible a warm referral will be provided to the FSS participant. The FSS coordinator will assist the participant in connecting to the referral source in an as needed basis.

Over time other services may become available while others may no longer be available. This list will be updated as needed.

- **Center for New Americans**
Provides free English classes, immigration, and citizenship support.
- **The Children's Advocacy Center of Franklin County and North Quabbin Area**
Provides services to prevent and end child abuse in our community by providing education, safety, healing and justice.
- **Clinic and Support Options**
Provides family support, mental health and addiction services, community-based programming including Green River House (club house model), crisis programs, housing, and homelessness services.
- **Community Action of Pioneer Valley**
Provides fuel assistance, VITA Free Tax program, Money Matters, Head Start, WIC, food pantry, Community Resources and Advocacy.
- **Community Health Center of Franklin County**
Provides health and mental health services, Massachusetts Health Connector navigation, dental services, reproductive health services, as well as additional services.
- **Community Legal Aid**
Provides legal services related to CORI/re-entry issues, concerns related to education, elders, veterans, employment, government benefits, family law.

- **Dress for Success**
Suiting women for professional careers, digital literacy program, and workforce readiness/mentoring programs.
- **Franklin County Community Development Corporation**
Assists small business and potential small business owners in developing and refining their business plans, lending programs, and commercial kitchen space for rent.
- **Franklin Regional Transportation Authority**
Regional transit authority providing fixed route and on-demand services.
- **Greenfield Community College**
Provides day and evening classes toward an associate degree, workforce development programs, and specialized programs to support non-traditional students entering or re-entering post-secondary education.
- **International Language Institute of Massachusetts**
Provides English classes and a university pathways program that offers individualized support to college students in navigating the US academic culture for immigrants.
- **LifePath**
The Area Agency on Aging provides services to support independent living for elders and persons with disabilities including protective services.
- **Harmon Personnel**
An alternative staffing organization with a social mission of helping people of low income move out of poverty through not only employment but case management when needed.
- **Housing and Consumer Education Center of Franklin County Regional Housing and Redevelopment Authority**
Provides information, education, and emergency assistance to renters as well as workshops geared toward preserving tenancy. Provides First Time Home Buyer course to FSS participants at no charge.
- **Just Roots**
A nonprofit farm that provides cooking classes, nutrition education, free home delivered meals, and a SNAP/HIP supported CSA share.
- **The Literacy Project**
Provides free basic education support for those seeking to obtain their GED/HiSet
- **Massachusetts Rehabilitation Commission**
Assists and supports individuals with disabilities to live and work independently. Our collaboration focuses on vocational rehabilitation.
- **MassHire Franklin Hampshire Career Center**
Provides a full range of workforce development activities as the local Title I Workforce Innovation and Opportunity Act provider.
- **Montague Catholic Social Ministries**
Provides for basic needs including food, clothing, and rental assistance, among other services.

- **New England Learning Center for Women in Transition**
Offers counseling, advocacy, and resources to individuals whose lives have been impacted by domestic violence and/or sexual abuse. Additionally, they provide prevention services as well as community education.
- **The Opioid Task Force**
A network of public and private partners whose goal it is to reduce addiction, fatal and non-fatal overdoses, and to support long-term recovery to improve the quality of life in Franklin County including a focus on housing and workforce development.
- **The Recovery Project**
Provides peer-to-peer support for those in all types of recovery.
- **Salvation Army**
Provides community support for basic needs including food, clothing, and social service referrals.
- **ServiceNet, Inc**
A mental health, addictions, and human services provider whose services include outreach and residential programs as well as clinical services.
- **Stone Soup Café**
A nonprofit which provides a pay what you can onsite or delivered meal once a week in addition to a Free Store for basic needs plus. The Café offers a Culinary Institute with a focus on professional development along with kitchen skills.

GHA and HRA certify services for FSS participants have been coordinated with Title I organizations under the Workforce and Innovation and Opportunity Act, to avoid duplication of services as well as to fill emerging gaps in services through the Program Coordinating Committee. Additionally, relevant services including but not limited to financial empowerment, childcare, and education coordination.

The FSS Coordinator will provide service coordination in addition to coaching. Coaching will be delivered in a trauma informed manner utilizing the framework of Stages of Change Theory. The FSS Coordinator will be knowledgeable about ACES and the effect they have on executive functioning in addition to motivational interviewing.

Method for Identification of Family Supports Needed

The FSS Coordinator will meet with each potential participant to assess motivation and needed supports for the family to be successful in their quest for self-sufficiency. At the enrollment meeting the FSS Coordinator will complete the Family Self-Sufficiency Profile with the participant to assess their strengths and growing edges to facilitate the development of the Individual Training and Service plan. The purpose of the Profile is to identify the appropriate resources for the family. Domains to be assessed include:

- Education Background
- Workforce Readiness
- Access to Transportation
- Childcare
- Health and Wellness

- Financial Literacy
 - Wage and Public Benefits
 - Income and Expenses
- Digital Literacy
- Food Security

Contract of Participation

The Contract of Participation (COP) is signed by the FSS Head of Household. It is a contract (agreement) between the participant and the PHA outlining the steps participants will take toward meeting their goals and the supports/resources to be provided by the PHA. An escrow account will be established for the FSS Family when the family's income increases due to an increase in earned income from wages and/or a small business/self-employment. The families baseline income for the purposes of the COP will be the most recent previous recertification.

The COP is signed prior to the family becoming an active participant in the program. The COP becomes effective on the first day of the month after the participant signs the contract. The COP ends five (5) years from the date of the participants next recertification.

HUD requires all participants to achieve 2 specific goals:

1. Seek and Maintain Employment, must be employed at the end of the contract
2. Independent of Welfare Assistance

The COP contains the Individual Training and Services Plan (ITSP). The ITSP delineates the action steps the participant will undertake toward self-sufficiency and the services to be provided for the family. Participants are encouraged to have interim goals related to but not limited to the following:

- Financial literacy/empowerment
- Education
- Job Training/Workforce Development
- Building a Small Business
- Health and Wellness
- Digital Literacy
- Improve Individual Transportation Access

The ITSP will contain agreed upon action steps the participant wishes to complete as part of their self-sufficiency journey. On an annual basis the participant and the FSS Coordinator will review the past years progress and modify the ITSP as needed. When an action step is completed, the participant will provide documentation to the FSS Coordinator the task has been completed. During the formation of the ITSP, the FSS Coordinator and the participant will agree upon which action steps need to be documented. Additionally, although the regulations do not stipulate how often the FSS Coordinator and participant need to meet, they do state the participant must be engaged with the program. The FSS Coordinator and the participant will negotiate what program engagement looks like for them. Failure to engage, as outlined in the ITSP, may result in termination from the FSS program.

Modifications to the ITSP will be attached to the original ITSP and signed by the participant and the FSS Coordinator. The last modification to the ITSP will be no later than six (6) months prior to their anticipated graduation date from the FSS program.

Extensions to the Contract of Participation

FSS participants may apply for an extension of their COP. The request must be made no later than 60 days prior to their original anticipated graduation date. Extensions will be granted in 6 month increments unless the reason for the request will take longer to complete such as a degree program. All extensions will be approved by the FSS Coordinator, and the Director of Leased Housing where the participant has their voucher. Extensions may be granted for the following reasons but are not limited to:

- Improve credit score up to the level needed for mortgage approval
- Complete a degree program
- Change in ITSP goals which will have a significant impact on the participants ability to become self-sufficient
- Involuntary loss of employment
- Finish a current goal which requires documentation
- Serious illness/FMLA related circumstances
- Begins new job up to 30-60 days prior to original end date, requires special permission from the FSS Coordinator and the Director of Leased Housing at the participants housing authority

In order for a participant to apply for an extension they need to be in “good standing” with the housing authority and the FSS program.

Interim Escrow Disbursements

FSS participants in “good standing” with the FSS program and the PHA may be eligible for an interim escrow disbursement. The request needs to be made in writing to the FSS Coordinator. Other requirements for interim disbursement include:

- MUST be actively engaged with the FSS program as defined in their ITSP.
- Must have completed at least one documented task related to their goals.
- The request MUST be related to one of their goals.
- The participant can request up to \$5,000 or 1/3rd of their escrow account, whichever is less.
- Documentation of the cost of the item to be purchased must be provided to the FSS Coordinator prior to a check being requested from the Finance Department.
- When possible, the payment will be made directly to the vendor.
- A receipt for the purchase must be submitted to the FSS Coordinator within two (2) weeks of the purchase. Failure to do so may result in termination from the FSS program.

A family can make one interim withdrawal per year. In this case the year beginnings the day the COP becomes effective.

Interim Disbursement Funds may be used for the following purposes by not limited to:

- Completion of higher education
- Business startup costs
- Car purchase or repair
- Pay down debt accrued PRIOR to joining FSS program

The request will be approved by the FSS Coordinator and the Director of Leased Housing of the participants PHA.

If the family does not complete the COP, the family is not required to repay the PHA.

Use of Forfeited Funds

When an FSS participant forfeits funds, the funds will be placed in an account for the benefit of FSS participants. The average American family's budget can be thrown off kilter by a \$500 expense. Once this fund has been established participants may request funds up to \$1500. Participants in good standing will be able to make a request in writing to the FSS Coordinator. The funds must be used to further a FSS goal. Priority will be given to those with escrow amounts under \$2,500. As with an Interim disbursement a receipt will need to be provided post purchase within two (2) weeks. Funds may be used for but are not limited to the following:

- Transportation
- Childcare
- Testing fees
- Training Costs
- Employment preparation
- Emergency car repair
- Textbooks
- Uniforms

When more than one participant requests funds and there are not enough funds to fund both requests the FSS Coordinator will explore alternatives with each participant. If there are still not enough funds the FSS Coordinator, the HRA Director of Leased Housing, and the GHA Director of Leased Housing will work together to form an equitable solution.

Funds from this account may not be used to satisfy a re-payment plan or other debt.

A family can make one interim withdrawal per year from this fund. In this case the year begins the day the COP becomes effective.

If the family does not complete the COP, the family is not required to repay the PHA.

Between their escrow account and the forfeited funds account a family can make two withdrawals per year as defined above. Families with over \$10,000 in the escrow account should use their escrow account instead of the forfeited funds account.

Re-Enrollment

There are many reasons a former participant may wish to re-enroll in the FSS program. We are aware a participant may enroll in the FSS program with the intent of achieving their goals yet have a challenging time attending to the task of becoming self-sufficient. As with making any major change in behavior, it may take multiple attempts to make the desired changes. Any participant who voluntarily withdraws from the FSS program is welcome to re-enroll after 12-months. Participants are welcome to enroll as often as they need to become self-sufficient.

FSS participants who have completed 5 years in FSS but did not receive an escrow payment shall be allowed to re-enroll in the FSS program without limitation.

FSS participants who graduated from the FSS program with escrow may re-enroll in the FSS program under 2 conditions with the approval of the FSS Coordinator and the Director of Leased Housing at the participants housing authority.

- A 25% reduction in financial circumstances
- To obtain a higher-level goal such as a 4-year degree after obtaining a 2-year degree

FSS participants who have been terminated from the FSS program for cause may also have lost their HCV voucher. When they become eligible for an HCV Voucher again, they will be eligible for the FSS program. All other scenarios of termination for cause will be reviewed by the FSS Coordinator, and the Director of Leased Housing from the participants housing authority who will decide based on the facts presented.

Completion of Contract of Participation

A family is considered to have completed the contract of participation when they have achieved their final goal of sustained employment and all individuals in the family are welfare free. Each participant will have a different path for reaching their employment goal. Participants will be encouraged to have at least one interim goal related to but not limited to the following areas:

- Financial Literacy/Credit repair
- Education
- Transportation
- Workforce readiness, certifications
- Health and Wellness

Participants must be working and welfare free to graduate from the FSS Program and receive escrow. If a participant identifies an interim goal that they wish to work on, interim goals may be added to the COP at any time up to 6 months prior to the anticipated graduation date.

The COP is considered complete five (5) years from the time of the first re-certification after the FSS participants signs their COP. Participants in good standing can apply for an extension for up to two (2) years. If an FSS participant completes their goals in under 5 years, the client is eligible to graduate from the FSS program. If a participant achieves all their interim goals, is

off welfare assistance, and has been sustainably employed the participant may graduate in less than five (5) years.

In order to graduate from the FSS program, participants will need to provide the documentation of goal/task completion agreed upon at enrollment. Documentation that may be asked for may include but not limited to:

- Credit Score
- Transcriptions
- Certificates from workforce activities
- Completion certificates from trainings
- Up to date resume
- Job offers letters
- Job Search Logs

Occasionally after someone has graduated from the FSS program their circumstances change such as a lay off and they may need some support from the FSS program. Graduates may access limited services from the FSS Coordinator for up to 12-months post-graduation unless there is a waiting list for the program. If there is a waiting list, the FSS Coordinator will offer the graduate a one-time only appointment.

Distribution of Final Escrow Funds

The accumulated escrow funds will be paid out to the FSS HOH when the Contract of Participation is complete. In order for funds to be distributed to the participate the following must be true:

- The participate is in good standing
- The participant is working
- The participant has provided all agreed upon documentation from the ITSP
- No family members are receiving welfare assistance

If the family has a repayment agreement with the PHA, the escrow funds due the participant will be reduced by the amount the participant owes the PHA.

The funds from the escrow account are the for participant to utilize as they see fit for their family. A copy of the HUD letter related to escrow and taxes dated May 8, 1992, to HUD Secretary Jack Kemp from the Department of Treasury will be given to participants when they receive their escrow check.

Escrow funds will be managed in accordance with 984.305 of the FSS Regulations

Failure to Comply with the Contract of Participation

The COP is a contract that is negotiated between the FSS participant and the FSS Coordinator as a representative of the PHA. The provisions of the contract are based on the wishes of the participant including what program engagement will look like for their family. Failure to comply with any part of the contract may result in the suspension of services or termination of

the COP. If the COP is terminated by the PHA, the participant does not receive any accumulated escrow. Potential actions which may result in services being withheld or termination include but are not limited to:

- Failure to comply with family obligations
- Failure to comply with lease requirements
- Failure to engage with the FSS program per ITSP and/or failure to actively seek employment or actively working toward acquiring the skills needed to obtain the job they have identified in their ITSP

Termination or withholding services from the Family Self-Sufficiency Program

Every effort will be made to engage all FSS participants above and beyond the negotiated level of engagement in the COP. However, occasionally a participant will need to be terminated from the program. Participants may be terminated from the program for the following reasons but not limited to and will not receive any accumulated escrow funds:

- Failure to comply with lease
- Failure to comply with the family obligations under the HCV program
- The family withdraws from the program

Under the following circumstances a participant, in good standing, may receive escrow funds if the COP is terminated:

- Services that the PHA and the participant have identified as essential for a family's advancement toward self-sufficiency are unavailable
- The FSS HOH becomes permanently disabled and unable to work
- The participant ports to another PHA which does not offer the FSS program

The COP is automatically terminated if the family's rental assistance is terminated.

If a participant is at risk of termination from the FSS program, the FSS coordinator will do the following:

- Reach out to the participant through their preferred mode of communication
- If, after two attempts, there has been no contact with the participant a letter will be sent informing the participant that their participation in the FSS program is in jeopardy if the participant does not contact the FSS Coordinator
- If, after 14, days there is no contact from the participant, a certified letter will be sent to the participant notifying them that they will be terminated from the program if there is no contact
- After 14 days, if there is no contact the participant will be terminated from the program. Any accumulated escrow funds, they have will be transferred to the Forfeited Funds Account.

Grievance Procedures

All requests for an informal hearing must be received by the FSS Coordinator within 14 days business days of the date of the FSS termination letter. 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:

- The FSS Head of Household
- The FSS Coordinator
- HRA or GHA staff member, other than FSS program staff, serving as Hearing Officer

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

The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with a disability. Good cause is defined as an unavoidable conflict with 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.

Program Coordinating Committee (PCC) and other collaborations

The purpose of the PCC is to assist the PHA in securing public and private resources for the FSS participants. The Franklin County Resource Network, is a community wide network consisting of service providers, serves as the GHA/HRA Alternate PCC. Membership consists of:

- Human services providers
- Community legal organizations
- Workforce development organizations
- Transportation providers
- Childcare providers
- Housing providers
- Health and Wellness organizations
- Food Security organizations
- English as a second language providers
- Family Support providers

The meetings are attended by a HCV holder, the FSS Coordinator, and other staff from HRA. FCRN meetings are held at least monthly. The FSS Coordinator meets with members of the alternative PCC on an as needed basis to facilitate the coordination of services. The FSS Coordinator will attend other workshops and meetings related to the Social Determinants of Health and trauma informed programming, among others in order to provide participant centered case management utilizing current best-practices in case management and participant engagement.

Portability

All HCV holders who are FSS participants and port into GHA or HRA will be able to transfer their FSS participation to their respective new PHA. If the FSS program has a wait list, they will be placed at the top of the wait list. They will be admitted as soon as a single slot opens up in order to maintain their momentum and assist the family in acclimating to a new community. They will receive any mailings or invitations to FSS workshops active participants receive.

When an FSS participant wishes to port to a new location, but the new location does not offer the FSS program, the participant and the coordinator will work together to complete as many interim goals in the time allotted.

Entering into the GHA/HRA FSS program will not change the end date of the COP. An extension may be granted for cause.

Reporting Requirements

GHA and HRA will abide by all reporting requirements per HUD regulations.

Definitions

ACEs

Adverse Childhood Experiences are potentially traumatizing events during childhood that can lead to poor life outcomes. The more ACEs a person experiences, the greater the potential for lasting effects on attention, behavior, and decision-making without the mitigating effects of adult support.

Baseline Rent

The rent the participant is paying at the time of enrollment in the FSS program is based on their most recent re-certification or lease up certification. Escrow will be determined based on this amount.

Case Management

For the purposes of the FSS program, case management is the assessment of need in order to collaborate with the participant to support the participant in achieving self-sufficiency. The case manager will provide referrals and other resources as needed to the participant in a timely manner.

Contract of Participation (COP)

The COP is a HUD form that delineates the rights and responsibilities of both the PHA and the participant. The contract sets forth the terms and conditions which govern the FSS Program.

Contract Rent

The amount of rent the property owner charges for the unit.

Earned Income

Income from work and/or a small business/self-employment, including tips and other compensation.

Escrow Account

An account is set up on behalf of the FSS participants when their rent increases due to an increase in earned income. Escrow credits will be made monthly to the escrow account until the participants income reaches 80% of AMI. The escrow account is an interest-bearing account. Funds will be managed per 984.305 of the FSS Regulations.

Family Rent

The portion of the contract rent the family is responsible for paying each month, generally 30% of the participants income. Under specific circumstances, with approval from the Leased Housing Representative, rent may equal 40% of the family's total income.

Family Self-Sufficiency Coordinator

The person who runs the FSS program. This may include but not limited to: outreach, recruitment, and retention of FSS participants, goal setting and case management/coaching, collaborating with community and service partners, and tracking participant performance.

First Time Homebuyer Program

A course designed for first time home buyers and approved by the Massachusetts Homeownership Collaborative to support first time home buyer in navigating the home purchasing process. Topics include credit, debt, types of mortgages, home inspections, and home maintenance.

Forfeited Funds Account Disbursement

An account will be established for the benefit of FSS participants with FSS Escrow funds that have been forfeited.

FSS Head of Household (HOH)

The FSS Head of Household is designated by the family. It can be the HVC HOH, or it may be any household member over the age of 18 who is motivated to participate in the program. By signing the Contract of Participation, the person who signs the COP is the designated FSS Head of Household chosen by the family and will receive any accumulated funds in the escrow account upon completion of the program. A FSS Family Designation of Head of Household form will need to be signed by the family.

Good Standing

A participant is considered to be in good standing with the FSS Program if they are engaged with the program as defined in their ITSP and is actively working toward their goals. The participant is considered in good standing with the PHA if they are in good standing with the FSS program, have no outstanding property owner issues, and they are up to date with their rent. If the participant has a repayment plan with the PHA, they must be up to date with their repayment plan.

Gross Rent

The gross rent is the total of the contract rent and the utility allowance based on unit size and fuel source.

Individual Training and Service Plan

The ITSP is part of the COP. It details the actions to be taken by the FSS participant as part of their journey toward self-sufficiency. Some actions will require documentation such as a transcript or certificate of completion for a training course. The FSS coordinator and the participant will agree at the time the COP is signed what actions will need documentation.

Interim Escrow Disbursement

GHA and HRA will allow interim escrow disbursements. In order for a participant to access escrow funds they need to have completed and documented at least one action step in their ITSP.

Motivational Interviewing

An evidence-based method used to support changes in behavior is designed to empower people to change by drawing out an individual's motivation to change. See Appendix C for more information

Participant Profile

Upon enrolling in the FSS program each participant will complete a needs assessment with the FSS Coordinator to create a profile which will inform the resources and supports provided for the participant. The profile will also identify strengths the participant can draw upon.

Program Coordinating Committee

A committee whose function it is to assist with securing public and private resources for the Family Self-Sufficiency Program. The PCC must consist of at least one HUD supported tenant.

Seek Employment

FSS participants must seek employment as part of their COP. Activities included in seeking employment include online job searches, filling out applications/submitting a resume, interviewing, attending school, attending trainings to increase employability. Documentation

of job search activities may be requested at any time. Failure to engage in job search activities may result in termination from the FSS program

Social Determinants of Health

Per Healthy People 2030, the Social Determinates of health are those factors in our lived environment such as where we are born, learn, and work, which have a wide-ranging effect on health and the quality-of-life outcomes.

Stages of Change Theory

A theory of behavioral change that was developed by Prochaska and DiClemente in the 1970's to describe the behavioral changes an individual progresses through in order to make and sustain change in behavior. The original work was done on smoking cessation. When making a sustainable behavioral change individuals move through predictable stages from pre-contemplation to maintenance. This theory can be applied to organizations as well as individuals.

Sustained Employment

A participant will be considered to be sustainably employed once they have completed the probationary period for their current employment.

Suitable Employment

The FSS participant and the FSS Coordinator, as a representative of the PHA, will agree upon suitable employment for the participant based on the skills, training, education, and receipt of other benefits by family members as well as the local job market where the PHA is located or the FSS participant lives.

Trauma Informed Practice

Is a strength-based approach to service delivery that involves an understanding of trauma, it's impact while actively seeking to avoid re-traumatization through a thoughtful approach to all aspects of service delivery.

Utility Allowance

Is the estimated reasonable cost of heat, water, cooling, refrigeration, and other similar expenses. The amount depends on fuel source such as gas or oil and is determined at the local level.

Welfare Assistance

It is this instance welfare assistance refers only to Temporary Assistance for Needy Families and includes only cash maintenance payments from the federal, state, or local level. It does not include payments of Non-Parental Child-Only Welfare grants per PIH 2007-20

APPENEDX: A



U.S. Department of Housing and Urban Development

Public and Indian Housing

Special Attention of:

Notice PIH 2007-20 (HA)

Regional and Field Office Directors

Of Public Housing; Public Housing Agencies

Issued: June 6, 2007

Expires: June 30, 2008

Subject: Impact of Non-Parental Child-Only Welfare Grants on Families Participating in the Family Self-Sufficiency (FSS) Program

Purpose.

This Notice provides guidance pertaining to FSS families that receive Temporary Assistance for Needy Families (TANF) grants that are made to a dependent child or to a caretaker on the child's behalf solely on the basis of the child's need and not on the need of the child's current non-parental caretaker. These grants are commonly referred to as "TANF child-only grants" or "TANF non-needy grants."

Background.

Section 554 of the National Affordable Housing Act of 1990 added a new Section 23 to the United States Housing Act of 1937 that created the FSS program to promote the development of local strategies that coordinate the use of public housing development assistance and housing assistance under the Section 8 rental certificate and voucher programs with public and private resources, to enable families to achieve

economic independence and self-sufficiency. The public housing agency (PHA) and the head of each participating family execute an FSS Contract of Participation (FSS contract) that specifies the rights and responsibilities of both parties.

To successfully complete its FSS contract the head of the FSS family must seek and maintain suitable employment and all family members must be independent of welfare assistance. An FSS escrow account is established for each FSS family. Credits to the escrow account are calculated based on increases in the earned income of the family during the term of the family's FSS contract. If the family completes its FSS contract, the family receives the funds in the escrow account.

The FSS regulations at 24 CFR Part 984.103 define welfare assistance for the FSS program as "income assistance from Federal or State welfare programs," that "includes

only cash maintenance payments designed to meet a family's ongoing basic needs."

Certain types of assistance are explicitly excluded from the definition of welfare assistance for the FSS program, such as non-recurrent short-term benefits, child-care services provided to working families and food stamps.

The Department has received many inquiries from PHAs asking whether TANF non-needy and child-only grants on behalf of a dependent child are considered welfare assistance under the regulatory definition for the FSS program. Typically, the inquiries involve TANF grants that have been provided when a grandparent takes a grandchild into the household for an indeterminate period of time near the end of the grandparent's FSS contract term. Grandparents or other relatives take the children into their homes when the parents are unable to care for the children. Such arrangements provide stability and continuity for the children and make it unnecessary for the children to enter the foster care system. The concern for FSS program participants has been whether receipt of the non-parental TANF child-only grant would prevent the FSS family from qualifying to receive the FSS escrow account.

Applicability.

The guidance in this Notice applies to families enrolled in the Public Housing and Housing Choice Voucher FSS programs administered by PHAs.

Impact of Non-Parental Child-Only Grants on FSS Households.

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

Additional Information.

Any questions about this Notice related to the HCV/FSS program should be directed to the Housing Voucher Management and Operations Division on (202) 402-4055. Questions related to the Public Housing FSS program should be directed to the Office of Public Housing Investments on (202) 402-2341. (These are not toll-free numbers.)

_____/s/_____

Orlando J. Cabrera, Assistant Secretary for
Public and Indian Housing