The Housing Authority of the County of Salt Lake

Public Housing
&
Housing Choice Voucher

Family Self-Sufficiency Program

Action Plan

Revised: June 2011

Upon request The Housing Authority of the County of Salt Lake makes accommodations for people with disabilities
The Housing Authority of the County of Salt Lake

www.hacsl.org

3595 South Main Street
Salt Lake City, Utah 84115

Main Phone Number:
801-284-4400

Telecommunications Device for the Deaf (TDD):
801-284-4407

Fax:
801-284-4406

Office Hours:
Monday - Friday 8 a.m. – 5 p.m.
Housing Authority of the County of Salt Lake
Public Housing & Housing Choice Voucher Family Self Sufficiency Program Action Plan

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Appendix:
HACSL Family Self Sufficiency Forms


Introduction
The Family Self-Sufficiency (FSS) Program is a federal program funded by the Department of Housing & Urban Development (HUD). It was created with the purpose of connecting participants on HUD housing assistance with existing public and private resources in their communities to support increased economic self-sufficiency.

The Housing Authority of the County of Salt Lake (HACSL) was established in 1970 by a group of citizens concerned with the housing needs of moderate and low-income families. HACSL’s mission is to provide and develop quality affordable housing opportunities for individuals and families while promoting self-sufficiency, empowerment and neighborhood revitalization.

HACSL began its FSS program in 1993. HACSL currently runs its FSS Program for both Public Housing (PH) and Housing Choice Voucher (HCV) participants. The FSS program is operated through HACSL’s Resident Services Department.

This FSS Action Plan contains the policies and procedures of HACSL’s Public Housing and Housing Choice Voucher FSS Program. It is designed to reflect the services the program provides to the participants it serves.

Summary of Program
The FSS Program is a service program offered free of charge to residents in HACSL’s PH and HCV Programs. Once enrolled, FSS Participants receive individualized case management and service coordination by an FSS case manager. These services support the participants in reaching their employment goals and any other goals they choose to set while on the FSS Program. In addition to employment goals, many participants choose to set goals related to improving their financial situation, increasing their education or purchasing a home. The contract of participation is typically a five year contract, and the participant may withdraw from the contract at any time. Participation in FSS is voluntary and will not affect the participant’s housing assistance.

Program Size
The FSS program at HACSL is a voluntary FSS program. The current voluntary program size is 130 Housing Choice Voucher participants and 50 Public Housing participants. This program is currently operating at or above its voluntary program size and is maintaining waiting lists (see Family Selection Procedures section for more information.)

Program Coordinating Committee
According to federal regulations guiding the FSS program, a Program Coordinating Committee (PCC) must be created and maintained to assist in “securing commitments of public and private resources for the operation of the FSS program.” The PCC is also helpful in providing the FSS Program input and guidance with the development and implementation of the program. The PCC is required to have a current HACSL PH participant who simultaneously serves on another resident board, as well as a current HACSL HCV participant. The PCC is also required to have members of the HACSL staff. In addition, we have a variety of community partners who choose to participate in the PCC. This helps the FSS team and its community partners to better coordinate our community resources with the hope of continuous improvement in the services provided to our shared client base and avoiding duplication of services and activities. The PCC meets quarterly and may conduct business on an as-needed basis via email, telephone conferences and in person.
Outreach Efforts

Outreach efforts for the FSS program may include, but are not limited to: mass mailing of program information to all current HACSL residents, informational flyer with application included in Annual Rent Exam Packets, program information available on the HACSL website, door to door recruiting for Public Housing tenants and presentations at Public Housing tenant meetings. Outreach materials will be available in English, Spanish and any other language as requested, assuming translating services for the language requested are available. Interpreters will be utilized as needed for all aspects of the FSS Program and clients may contact staff via our TTD telephone line, fax, email, telephone or in-person. Efforts will be targeted equally to minority and non-minority families to ensure that non-English and limited English speaking families receive information and have the opportunity to participate in the FSS program. Upon request, the HACSL FSS program provides reasonable accommodations for people with disabilities.

Family Selection Procedures

HACSL will select families for participation in the FSS program in accordance with HUD guidelines and the policies defined below. The FSS Program Coordinator will maintain a waiting list for each FSS Program (HCV FSS & PH FSS). In general, applicants will be added to their program’s waiting list in the order in which their FSS Applications are received. Families are then selected to enroll in the HACSL PH and HCV FSS Programs as slots become available in the program the family qualifies for based on their type of housing assistance.

There is an opportunity for family’s receiving certain services to be prioritized on the waiting list for their FSS Program. Federal regulations state that HACSL’s FSS program may exercise its right to give preference on the FSS waiting list for up to 50 percent of the total number of FSS slots to applicants who are participants in a related service program. Therefore HACSL will give preference on the FSS Waiting Lists for up to 65 participants in the HCV FSS program and 25 participants in the PH FSS Program who are enrolled in a “related service program.” HACSL defines these “related service programs” as: current HACSL PH FSS Program Participants transferring into the HCV FSS Program, HACSL’s Permanent Supportive Housing Programs, HACSL’s Prevention Programs, the ROSS Family Services Program and current HACSL PH or HCV participants referred to the FSS program by a PCC partner agency. PCC partner agencies will refer such clients by completing the Community Partner Referral Application. A HACSL staff must confirm the applicant’s participation in a related service program for the applicant to be eligible for preference on the waitlist. This preference also extends to active FSS participants from other housing authorities who have ported to HACSL. At all times, families who enter the selection process must be active recipients of designated HACSL housing assistance programs (HCV or PH).

If an applicant is eligible to receive preference, as defined above, then that applicant will be placed at the top of their program’s waiting list. If there are other applicants already on the waitlist who have received preference, then all applicants receiving preference will be ordered at the top of the waitlist in the order their applications were received. Once all applicants on the waitlist receiving preference have been served, applicants who are not receiving preference will be served.

Federal Regulations allow HACSL to motivationally screen applicants to HACSL’s FSS program before enrolling in the program; however, the HACSL FSS Program has chosen not to include motivational screening in Family Selection Procedures.

The FSS Program Staff have the primary responsibility to ensure that participants are not discriminated against in the selection process. It is the policy of HACSL to comply with all Federal, state, and local nondiscrimination laws, the Americans with Disabilities Act and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. 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 ground of race, color, sex, religion, national or ethnic origin, familial status, source
of income, or disability. In addition, HACSL’s FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program.

Program Orientation

Before enrolling in the FSS Program, all applicants must participate in an FSS program orientation on either a group or individual basis. It is the participant’s decision whether they attend an orientation before applying to the program, while on the FSS waiting list, or when they are ready to enroll in the program. The orientation will include a review of HACSL’s FSS Program, including discussion of: services offered to program participants, participant expectations, an introduction to the FSS Escrow Account, requirements to complete the FSS program, and the voluntary nature of the FSS program. FSS Applicants who have successfully completed the FSS program orientation are eligible to be enrolled in the FSS Program when there is space available.

Incentives to Encourage Participation

As part of the FSS program, HACSL offers incentives to encourage participation and enhance the participant’s ability to achieve self-sufficiency. Some of these incentives are described below.

HACSL will establish an FSS Escrow Account for each eligible participating family in accordance with HUD guidelines as a financial incentive for program participation. Please see the Escrow Account section for more detailed information on this program incentive, and how it can help financially assist clients to reach their self-sufficiency goals while they are on the FSS program and after they have completed the program.

Participation in the HACSL FSS Program will count as the community service hours required for Public Housing participants. Additional incentives include, but are not limited to: access to a variety of referrals for education, job training and employment support, access to free financial management classes and comprehensive credit counseling, access to free credit reports and scores from the Experian Credit Bureau throughout enrollment in the program, access to free GED/HS Diploma preparation services through community partners, and free GED testing. If participants are interested in pursuing Homeownership, FSS clients have a wide network of services available that assist with everything from homebuyer education to down payment assistance programs. FSS participants also have a number of personal incentives for involvement including structured goal planning, greater opportunity to increase their standard of living, an enhanced support system, etc. Please note that many of these incentives are contingent on available funding and are therefore subject to change.

Activities and Supportive Services

FSS program participants have access to an extensive network of activities and supportive services to assist them in becoming more self-sufficient. Some of the activities and services are done directly by the FSS staff, some through program partners, and others through referrals to community agencies. The following list of activities, services, and service providers reflect the current situation but these are liable to change as the FSS program and other agencies adapt to changing situations:

Case Management, Advocacy, and Referrals: A family participating in the FSS program will be in regular contact with a case manager to develop and carry out the Individual Training and Services Plan. The case manager will provide ongoing supervision of the participant’s progress and act as an advocate to empower families toward self-sufficiency. In addition, the case manager will facilitate and monitor other agency involvement and track participant progress on a regular basis.
Employment:
  Department of Workforce Services
  State Office of Rehabilitation (Vocational Rehabilitation Program)
  People Helping People
  Community Action Program’s Employment Readiness Program
  Salt Lake Community College’s Community Writing Center

Education:
  Adult Basic Education programs in the Salt Lake Valley
  Salt Lake Community College
  Literacy Action Center
  English Skills Learning Center
  Student loan services
  Pell Grant application and Federal Application for Student Aid (FAFSA)

Childcare Resources:
  Department of Workforce Services
  Childcare Resource and Referral Metro
  Headstart Program
  Boys & Girls Club

Financial Management:
  Financial Management Workshops at HACSL taught by bank volunteers
  AAA Fair Credit Foundation
  Individual Development Account Program
  Volunteer Income Tax Assistance

Homeownership:
  Utah State University: Homeownership Education Course
  Community Development Corporation
  HomeStart Program (in partnership locally with Zions Bank)
  Salt Lake Valley Habitat For Humanity
  NeighborWorks Salt Lake

Health Services (Medical Insurance):
  Department of Workforce Services
  Valley Mental Health
  Salt Lake County Resource and Referral
  Salt Lake Valley Health Department
  Health Clinics of Utah
  Women, Infants and Children (WIC)

Crisis Management / Emergency Assistance:
  Housing Retention Program
  Department of Workforce Services
  Community Action Program
  Catholic Community Services
  Asian Association
  Crossroads Urban Center
  Salvation Army
  LDS’s Welfare Square/Bishop’s Storehouse
  Utah Foodbank
  Family Support Center
Method for Identification of Family Support Needs

Participants in the FSS program work closely with the FSS case managers to identify family needs in a holistic manner and to develop an Individual Training and Services Plan (ITSP), which is an attachment to the Contract of Participation. The ITSP identifies the final goals the participant will complete while enrolled in the program and the interim goals and activities that will be included in reaching those goals. During the first meeting with a new FSS participant, the case manager will complete the FSS Needs Assessment with the client. This assessment helps the case manager and participant begin the goal setting process. The FSS Case Manager will assist the participant in setting specific, measurable, attainable, realistic and timely (SMART) goals whenever possible. The head of household is required to complete and sign the Contract of Participation (COP), the Individual Training and Services Plan (ITSP), and any related documentation.

While on the FSS Program, a client must work with their FSS case manager to report progress towards their ITSP goals within the timeframes indicated. The FSS Case Manager will assist the clients to locate and secure resources available in the community to assist them with their goals, and will help navigate barriers to completing the goals whenever possible. The FSS Case Manager will track this progress with the FSS Progress Report Form. Each time this FSS Progress Report Form is completed with a participant, it serves as an internal needs assessment to continue helping the participant and the case manager identify new/existing needs as they relate to their goals of self-sufficiency.

The HACSL FSS Program understands that throughout the course of the FSS Program, a participant’s priorities and goals may change. Therefore, the program allows changes to be made to the ITSP during Contract of Participation. Changes to an ITSP goal, including cancellation of that goal entirely, must be signed by the client and the FSS Case Manager before they will be considered valid. All proposed changes to a participant’s ITSP will be evaluated on a case by case basis and the HACSL FSS Program will have the final authority in the approval or denial of a change to an ITSP goal.

The head of household is the only family member required to have an ITSP while on the FSS program, however, other adult household members can choose to work with an FSS case manager to create an ITSP. This secondary ITSP does not have the same employment requirements; however, all goals must be completed within the designated timeframes.

In accordance with HUD guidelines, the head of household on the FSS Contract of Participation will always be the same as the Head of household for the purposes of housing assistance. Changing the Head of Household on the housing assistance will automatically change the head of household for all FSS program purposes, including the FSS Escrow Account. FSS Case Managers will make every effort to inform the participant about these changes; however, there will be no new COP signed, only a Change in Head of Household Verification will be attached to the original COP as verification of the change.

FSS Escrow Account

An FSS Escrow deposit is calculated based on an increase in earned income from the beginning of the clients FSS COP. The household’s “family rent” is calculated in the COP. In general, an increase in the family’s earned income after enrolling in the FSS program that leads to an increase in the household’s “family rent” (as compared to the original figure in the COP) generates the beginning of escrow earning.
Escrow credit calculations are made whenever HACSL conducts an interim or annual re-examination during the Contract of Participation. The FSS program will notify a participant if s/he begins to earn escrow in the program. HACSL will credit escrow accounts monthly; these credits will be effective on the first day of the month during which they are credited. HACSL will calculate and credit interest quarterly. Semi-annually, HACSL will provide all current FSS participants with an escrow statement reflecting the current balance, deposits, withdrawals, and interest accrued in the participant's escrow account.

Interim Disbursement of the escrow account:

The HACSL FSS Program allows clients to receive interim disbursements from their escrow accounts in accordance with the following guidelines:

Participants in the FSS program with a positive escrow balance will be allowed to request money from their escrow accounts prior to the completion of their Contract of Participation. Requests for interim disbursements must be related to one or more goals articulated in the participant’s ITSP. The participant must demonstrate they have made progress toward that goal before being approved for an interim disbursement. Acceptable progress towards the goal(s) will be determined by the FSS team while they review the participant’s complete Application for Interim Disbursement during weekly FSS staff meetings. The decision to release escrow will be made by consensus of the FSS staff members.

The FSS program reserves the right to request that a participant complete a budget and/or provides additional documentation prior to making a decision on the participant’s interim disbursement request.

Interim disbursement checks are cut directly to the FSS Participant; it is each participant’s responsibility to submit documentation (i.e. receipts) to their FSS Case Manager to verify the funds were spent as intended on the Application for Interim Disbursement. An FSS Program participant will not be eligible to receive future interim disbursements from their escrow account if proper documentation is not received.

Porting the escrow account:

In accordance with HUD guidelines, the HACSL FSS program allows HCV FSS clients who port their FSS Contract of Participation to port their FSS escrow accounts as well. The escrow account will be ported when the receiving housing authority absorbs the voucher of the participant.

Please note: In some cases, the receiving housing authority may not absorb the voucher and HACSL continues to administer that voucher. In this situation, the HACSL FSS Program would continue to oversee the escrow account under the policy’s defined in this action plan for the remainder of the contract or until the absorption of the voucher, whichever comes first.

Final Disbursement of the escrow account:

Final disbursement of the FSS Escrow Account will be made to the FSS head of household when the participant completes the contract of participation and can verify that no one in the household is receiving welfare, as defined by FSS guidelines (see Contract Completion section below for more information and the HACSL FSS Program’s definition of welfare.)

The Final Disbursement check will be made payable to the current Head of Household receiving the housing assistance, which is determined in accordance with HUD guidelines. There are no requirements or stipulations on the participant’s use of the final disbursement funds.

Please note: any outstanding debt owed by the participant to the Housing Authority of the County of Salt Lake will be debited from the escrow account before the final escrow is paid out.

Forfeiting of the Escrow Account:
If the FSS Contract of Participation is terminated, the balance of the participant’s FSS escrow account will be forfeited in accordance with HUD guidelines. In the case of forfeiture of escrow, clients will not be responsible to “pay back” any interim disbursements of their escrow account they received while enrolled in the HACSL FSS Program.

**Contract Completion**

In order to complete the FSS Contract of Participation and receive the balance of the FSS Escrow Account, the FSS Family must meet one of the following sets of criteria:

a) The head of household must seek and maintain suitable employment and must verify that no one in their household has received welfare for the previous 12 months. (Please read the FSS Program’s definitions of the words ‘seek’, ‘suitable’ and ‘welfare’ below.) In addition, the head of household, and any additional adult family members who created an ITSP, must complete all goals listed on the ITSP within the designated timeframes. Lastly, the participant must apply and be approved for their Final Disbursement from their escrow account by completing the Final Disbursement Application, Landlord Statement, DWS Certification, Employment Verification Form, and any documentation required to verify completion of goals. The complete application will be staffed by the FSS team for approval.

b) The family’s income is effective at or above 30% of the fair market rent (FMR) for their qualifying unit size. The participant must apply and be approved for their Final Disbursement from their escrow account by completing the DWS Certification, which will be staffed by the FSS Team for approval.

Please note: in Contract Completion type (b), it is possible to complete the contract of participation and not be eligible for a final escrow disbursement. If a participant is above 30% FMR and a member of the household is still receiving welfare, the participant will complete their contract of participation when the income changes goes into effect, but will not be eligible to receive their final escrow because they are still receiving welfare assistance, as defined below.

**Definitions:**

- **Seek:** The HACSL FSS Program defines “seek” as: making progress towards activities, interim goals and final the final employment goal as set on the participant’s ITSP. The participant must demonstrate this progress at least annually by communicating with the FSS Case Manager, who will complete the FSS Progress Report Form.

- **Suitable:** The HACSL FSS Program defines “suitable” employment as a lawful activity that falls into at least one of the following categories:
  - Employment which is verifiable for at least 32 hours/week. Employment must be with one (or more) established, legitimate business(es).
  - Self-employment which is verifiable and reflects net earnings (after business expense deductions) of at least 32 hours per week at the current Utah minimum wage.
  - Contracted or commission employment may be considered if it meets the hourly/income requirement, is verifiable, and is being declared for tax purposes. These cases will be staffed on an individual basis for approval.
  - Reasonable Accommodation for Disabled Individuals: Requests for a reasonable accommodation to the FSS program’s definition of “suitable” must be submitted in writing.
prior to program completion. The statement must be supported by a written statement from the individual’s certified medical provider, which is required to include a recommendation from the medical provider as to a specific number of hours that the individual is able to work per week. The FSS program will consider the number of hours specified by the medical provider when determining the hours required for the client to be “suitably” employed.

In addition to the above listed criteria, “suitable” employment will be determined by the HACSL FSS staff, after consulting with the head of household, and will be determined based on the skills, education, and job training of the participant and available job opportunities in the area.

Welfare: HUD defines welfare specifically for the FSS program in their guiding documents. It is defined as income assistance from Federal or State welfare programs, and includes only cash maintenance payments designed to meet a family’s ongoing basic needs. It does not include food stamps, Social Security payments, Medicaid, or similar benefits. In addition, HUD clarified in PIH Notice 2007-20 that “child only” or “non-needy” TANF grants “do not qualify as welfare assistance under FSS regulations.”

Contract Extensions

The initial term of the Contract of Participation is five (5) years, but in rare circumstances the contract may be extended for up to two (2) additional years. Requests for an extension of the contract will be evaluated on a case by case basis to see if “good cause” exists for granting an extension. In general “good cause” means a circumstance beyond the family’s control and that directly prevents the participant from meeting the obligations of the contract.

Such causes may include:

• Serious illness or injury in the immediate family.
• Involuntary loss of employment.

An extension may also be granted to allow the family to meet the interim goal of remaining off welfare (as defined above) for the final 12 months of the Contract. Extensions will not be granted for loss of employment due to the lack of performance on the part of the FSS participant.

All requests for extension must be submitted prior to expiration of the Contract of Participation by completing the Extension Request Form. Participants will be notified in writing within ten (10) business days of HACSL’s decision and may request an informal hearing if they disagree with the decision (see Hearing Procedures section for additional information).

Contract Termination

A participant’s Contract of Participation with the HACSL FSS Program may be terminated under the following circumstances:

• If the family withdraws from the FSS Program
• Mutual consent of both parties (HACSL FSS program & the Head of Household on the Contract).
• The failure of the FSS family to meet its obligations under the contract of participation without good cause. In general, this will be determined on a case by case basis by the FSS team to determine if there is “good cause” for not meeting the contract obligations. In general, “good cause” means a circumstance beyond the family’s control that directly prevents the participant from meeting the obligations of the contract.
• If an act occurs that is inconsistent with the purpose of the FSS program
If a client fails to report progress to their FSS Caseworker at least semi-annually. The Progress Report Form will serve to document compliance with reporting progress. In the event the participant cannot be contacted for a report on progress, the case manager will mail the participant a Final Notice describing what action is needed of them to avoid contract termination. In the event that the participant does not comply with the actions outlined in the Final Notice, the contract of participation will be terminated.

If the participant’s housing assistance is terminated

HCV FSS Participants: If the participant ports their voucher to another jurisdiction and enters into an FSS Contract in their new jurisdiction, the HACSL FSS Contract of Participation will be terminated. The HACSL FSS program has decided not to require a 12 month period on the HACSL FSS Program before honoring a port; the participant may port their HCV FSS contract at any time and FSS Case Managers will make an effort to assist them in this process.

In the case of a participant’s Contract of Participation being terminated:

- All escrow money held on the family’s behalf will be forfeited in accordance with HUD regulations. (Exception: please see the Porting the Escrow Account section for more information on how a participant’s escrow may be held by HACSL if the participant ports their FSS contract but their voucher is not absorbed by the receiving housing authority.)
- The participant will receive a written notice stating the reason for their termination from the FSS Program, and advising them of their right to request a Fair Hearing.

The HACSL FSS Program uses termination of the COP as the only corrective action for the failure to comply with family obligations defined in the Contract of Participation. This program will not terminate supportive services obtained for the client or terminate an HCV participant’s housing assistance if a participant is terminated from the HACSL FSS Program.

Termination from the HACSL FSS program for any reason does not preclude a client from future participation in HACSL’s FSS program.

Grievance Procedures

The HACSL FSS Program will make efforts to resolve any and all grievances of FSS participants in accordance with the policies outlined in this Action Plan, current HUD regulations for the HCV, PH and FSS programs, HACSL’s current Administrative Plan and HACSL’s current Admissions & Continued Occupancy Policy of the Public housing Program. In the unlikely event that a grievance is not resolved, an FSS program participant can request a hearing in accordance with the grievance procedures for the type of housing assistance the participant receives from HACSL by calling 801-284-4400.