



Housing Authority and Urban Renewal
Agency of Polk County

Public Housing

&

Housing Choice Voucher

Family Self-Sufficiency Program

Action Plan

Revised: September 2022

Family Self-Sufficiency Action Plan

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Chapter 1

THE FAMILY SELF-SUFFICIENCY PROGRAM AND THE FSS ACTION PLAN

INTRODUCTION

This chapter provides an overview of West Valley Housing Authority’s Family Self-Sufficiency (FSS) Program and FSS Action Plan, including the purpose, organization, and required contents of the action plan.

Part I: The Family Self-Sufficiency (FSS) Program and FSS Action Plan: This part provides an overview of the program and the purpose of the action plan.

Part II: Requirements of the FSS Action Plan: This part covers the requirements, including the development, revision, and contents of this action plan. It also contains information on family demographics, which are a requirement of all action plans.

PART I: THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM AND FSS ACTION PLAN

1-I.A. OVERVIEW OF THE FAMILY SELF-SUFFICIENCY PROGRAM

The origins of the FSS Program are in two pilot projects implemented in 1986 and 1990, Project Self-Sufficiency and Operation Bootstrap, respectively. These projects were set up to test self-sufficiency programs for families with housing subsidies, and both demonstrated that families needed essential services to move toward economic self-sufficiency. These services include child care, transportation, medical care, and long-term education and training.

In the wake of the successful demonstration of these projects, family self-sufficiency became one of the initiatives under the Homeownership and Housing Opportunities for People Everywhere (HOPE) Program enacted in 1990, and the FSS Program was subsequently created under the National Affordable Housing Act in the same year.

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. The 1993 regulations were further modified by the Quality Housing and Work Responsibility Act of 1998 (QHWRA). In 2018, expansive changes were made to the FSS Program by the Economic Growth, Regulatory Relief, and Consumer Protection Act, also known as, “the Economic Growth Act” or “the Act.”

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

This FSS Program is administered by the **West Valley Housing Authority (WVHA)** for the jurisdiction of **Polk County**; outside the **Urban Growth Boundary (UGB) of the City of Salem, Oregon**.

1-I.B. APPLICABLE REGULATIONS

Applicable regulations for Housing Choice Voucher (HCV) and Public Housing (PH) FSS Programs include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 902: Public Housing Assessment System
- 24 CFR Part 903: Public Housing Agency Plans
- 24 CFR Part 945: Designated Housing
- 24 CFR Part 960: Public Housing Admission and Occupancy Policies
- 24 CFR Part 965: WVHA-Owned or Leased Projects—General Provisions
- 24 CFR Part 966: Public Housing Lease and Grievance Procedures
- 24 CFR Part 982: Tenant-Based Assistance: Housing Choice Voucher Program
- 24 CFR Part 984: Housing Choice Voucher and Public Housing Family Self-Sufficiency Program

1-I.C. THE FAMILY SELF-SUFFICIENCY ACTION PLAN

The Family Self-Sufficiency (FSS) Action Plan is required by HUD. The purpose of the action plan is to establish policies for conducting the WVHA FSS Program in a manner consistent with HUD requirements, plus local goals and objectives contained in WVHA's Agency Plan. This action plan is available for public review as required by 24 CFR Part 903.

This FSS Action Plan is set forth to support and define WVHA's local policies for the operation of the program in the context of federal laws and regulations. All issues related to FSS not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable laws. The policies in this action plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

The WVHA is responsible for complying with all changes in HUD regulations regarding the FSS Program. If such changes conflict with this plan, HUD regulations will take precedence.

Administration of the FSS Program, plus the functions and responsibilities of agency staff, shall comply with WVHA's personnel policy, and HUD's regulations, along with federal, state, and local fair housing laws and regulations.

PART II: REQUIREMENTS OF THE FSS ACTION PLAN

1-II.A. OVERVIEW

WVHA must have a HUD-approved action plan before implementing an FSS Program, regardless of whether the program is mandatory or voluntary. Further, this action plan must comply with the requirements specified in federal regulations [24 CFR 984.201(a)].

The regulatory requirements dealing specifically with this FSS Action Plan itself largely involve the development, revision, and required contents of the action plan. This part covers those requirements.

1-II.B. HUD APPROACH TO POLICY DEVELOPMENT

In developing policy for the FSS Action Plan, the West Valley Housing Authority (WVHA) needs to be aware of the distinction HUD makes between mandatory and discretionary policies.

- *Mandatory policies* are those driven by legislation, regulations, current handbooks, notices, and legal opinions.
- *Discretionary policies* consist of those developed for areas in which WVHA has regulatory discretion, or regarding optional, nonbinding guidance including guidebooks, notices that have expired, and recommendations from individual HUD staff.

HUD expects the WVHA to develop policies and procedures that are consistent with mandatory regulations and to make clear the optional policies the HA has adopted. WVHA's FSS Action Plan is the foundation of those policies and procedures for the program. HUD's directions require agencies to make policy choices that guide staff and consistency to program applicants and participants.

Even though it is not mandatory, adopting HUD's guidance provides housing authorities (HAs) with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If the WVHA chooses an alternative strategy, it must determine that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's "safe harbor", however, HAs should carefully consider those decisions.

1-II.C. FSS ACTION PLAN DEVELOPMENT AND REVISION

Development of the Action Plan [24 CFR 984.201(b) and (c)]

When developing an FSS Action Plan, WVHA must do so in consultation with the board of commissioners, executive director, programs manager, and the Program Coordinating Committee (PCC).

For all voluntary or mandatory FSS Programs, HAs must submit their action plan and obtain HUD approval of the plan before it can implement a program. This includes a voluntary program established because the HA chose to implement an FSS Program that exceeds the minimum size for a mandatory program (see Section 2-II.A. for a discussion of mandatory versus voluntary FSS Programs).

Single Action Plan [24 CFR 984.201(f)]

HAs implementing both a Housing Choice Voucher (HCV) and Public Housing (PH) or an Indian Housing FSS Program may submit one action plan. In cases where the HA decides to submit one plan for more than one program, the policies contained in the action plan would apply to both programs.

WVHA Policy

WVHA will submit one action plan as it operates both, an HCV and PH FSS Program. All policies contained in the plan shall apply to both programs.

Revision to the FSS Action Plan [24 CFR 984.201(c)(2)]

Following HUD's initial approval of the action plan, no further approval is required unless the WVHA proposes to make policy changes to the plan, increase the size of a voluntary program, or make revisions as needed to comply with changes in HUD regulations. WVHA must submit any changes to the action plan to HUD for approval.

WVHA Policy

The WVHA will review and update its action plan at least once a year, and more often if needed, to reflect changes in regulations, HA operations, or when needed to ensure staff consistency in operation.

1-II.D. CONTENTS OF THE PLAN [24CFR 984.201(d)]

HUD regulations state that several components must be included in this FSS Action Plan. At a minimum, the action plan must cover the policies and procedures of WVHA for the operation of a local FSS Program as follows:

- Family demographics, including a description of the number, size, characteristics, and other demographics such as racial and ethnic data, in addition to the supportive service needs of the families, expected to participate in the program. (Chapter 1)
- Estimate of participating families, which means the number of families which can reasonably be expected to receive supportive services under WVHA's FSS Program. (Chapter 2)
- Eligible families from any other local self-sufficiency program that wish to execute an FSS Contract of Participation. (Chapter 2)
- A statement of WVHA's FSS family selection procedures, including a description of how the procedures ensure that families are selected without regard to race, color, religion, disability, sex, familial status, or national origin. (Chapter 4)
- A description of the incentives that WVHA intends to offer to families to encourage participation in the FSS Program (an incentives plan), including the establishment of the escrow account. (Chapter 4)
- An explanation of WVHA's outreach efforts to recruit eligible families, the actions that they will take to ensure that both minority and nonminority groups are informed about the FSS Program, and how the HA will make this information known. (Chapter 4)
- A description of the FSS activities and supportive services to be provided by both public and private resources to FSS families, and identification of these public and private resources. (Chapter 4)
- A description of WVHA's method for identifying family support needs, including how it will identify the needs and deliver the services. (Chapter 4)
- A description of the WVHA's policies regarding program termination or withholding of services based on a family's failure to comply with the FSS contract, and available grievance procedures. (Chapter 5)
- Assurances of noninterference with rights of non-participating families stating that a family's election to not participate in the FSS Program will not affect the family's admission to the HCV or PH Program, nor will it affect their right to occupancy under their lease. (Chapter 4)
- A timetable for implementation of the FSS Program, including the schedule for filling FSS slots with eligible FSS families. (Chapter 2)

- A certification that the development of the services and activities under the FSS Program has been coordinated with programs under Title I of the Workforce Innovation and Opportunity Act, other relevant employment, childcare, transportation, training, education, and financial empowerment programs in the area, and will continue to be coordinated to avoid duplication of services and activities.

Optional Additional Information [24 CFR 984.201(d)(13)].

- HUD encourages additional information in the action plan that would help to determine the soundness of the WVHA proposed FSS Program.

WVHA Policy

The WVHA will submit additional optional information in this action plan that will help HUD determine the soundness of the proposed FSS Program.

This information includes:

Policies that are related to the modification of goals in the ITSP. (Chapter 5)

Policies on the circumstances in which an extension of the Contract of Participation may be granted. (Chapter 5)

Policies on the interim disbursement of escrow, including any limitations on the use of the funds. (Chapter 6)

Policies regarding eligible uses of forfeited escrow funds by families in good standing. (Chapter 6)

Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating. (Chapter 4)

Policies on requirements for documentation for goal completion. (Chapter 4)

Policies on documentation of the household's designation of the "Head of FSS Household." (Chapter 4)

Policies for providing an FSS selection preference for porting families if the WVHA elects to offer such a preference. (Chapter 7)

1-II.E. FAMILY DEMOGRAPHICS [24 CFR 984.201(d)(1)]

As part of the required contents of WVHA’s FSS Action Plan, family demographics of the HCV and PH program participants serve to describe the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants). This data may later be used to help the HA and PCC to identify the supportive service needs of the families expected to participate in the FSS Program.

WVHA Policy

HCV and Public Housing	Total Families	Percent of Total
All Families	955	100
Single	600	63
Female HOH	445	47
Male HOH	207	22
Race	Total Family Members	Percent of Total
	1759	100
White	1646	94
Black/African American	41	2
American Indian/Alaska Native	34	2
Asian	3	<1
Native Hawaiian/Other Pacific Islander	3	<1
Ethnicity	Total Family Members	Percent of Total
	1759	100
Hispanic or Latino	306	17
Not Hispanic or Latino	1449	82
Income	Total Families	Percent of Total
	955	100
Extremely Low-Income	659	69
Very Low-Income	195	20
Low-Income	54	6
HOH Income from Wages	129	14
Other Member Income from Wages	35	4
HOH Income from TANF	101	11
Other Member Income from TANF	2	<1

HOH Income from SSI	770	81
Other Member Income from SSI	101	11
Number of Children	Total Families	Percent of Total
	955	100
0	724	76
1-2	223	23
3-4	111	12
5 or more	18	2
Total Number of Family Members	Total Families	Percent of Total
	955	100
1-2	892	93
3-4	120	13
5 or more	58	6
Persons with Disabilities	Total Families	Percent of Total
	955	100
HOH Person w/ Disabilities (HUD)	514	54
Family Members w/ Disabilities	316	33

Chapter 2

PURPOSE, SCOPE, AND APPLICABILITY OF THE FAMILY SELF-SUFFICIENCY PROGRAM

INTRODUCTION

This chapter contains information about the West Valley Housing Authority's (WVHA) FSS Program's purpose, size, and measurable objectives as well as information on program operation. This includes potential participant demographics, the program timetable, the number of families to be served, and the size of WVHA's voluntary FSS Program. This chapter also contains definitions of the key terms in this FSS Action Plan.

Part I: The Purpose and Basic Requirements of the FSS program: This part includes a description of the purpose of the FSS Program on a national level—its intent, goal, and major strategies.

Part II: The Scope of the FSS Program: This part contains information about housing assistance programs eligible to participate in FSS, the size of WVHA's FSS Program, an estimate of participating families, eligible families from other self-sufficiency programs, and eligibility for combined FSS Programs.

Part III: Program Operation: This part specifies the requirements for FSS Program operation, including voluntary FSS Program implementation.

Part IV: The Definitions of Terms Used in WVHA's FSS program: This section contains both HUD and WVHA definitions for terms used in this policy document.

PART I: PURPOSE AND BASIC REQUIREMENTS OF THE FSS PROGRAM

2-I.A. PURPOSE

The purpose of the WVHA's FSS Program is to promote the development of local strategies to coordinate the use of HCV and PH assistance programs with public and private resources enabling families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency [984.101(a)(1)].

In addition to this broader national goal of the FSS Program, the WVHA also establishes a local goal consistent with the agency's mission statement to serve as a guide for establishing policy and implementing the FSS program.

WVHA Policy

WVHA's goal in operating this FSS Program is to help families maintain quality housing and coordinate services found in the local community to assist participating households with achieving economic self-sufficiency. ***Economic self-sufficiency*** is defined as having the sustainable skills necessary to maintain employment that pays a "living wage." This wage would pay for the family's basic needs decreasing their need for government subsidies.

2-I.B. PROGRAM OBJECTIVES [24 CFR 984.102]

To reach the FSS national program goal, HUD has defined its FSS Program objective as reducing the dependency of low-income families on welfare assistance and housing subsidies. Under the FSS Program, low-income families are provided opportunities for education, job training, counseling, and other forms of social service assistance while living in assisted housing so that they may obtain the education, employment, business, and social skills necessary to achieve self-sufficiency. As with the goals of the program, program objectives are defined on the national level through FSS regulation, and on the local level by WVHA policy.

WVHA Policy

On the local level, WVHA will achieve the national program objective by offering low-income families a broad range of services through partnering with the program coordinating committee (PCC). These services will provide needed education, job training, counseling, and other forms of social service assistance so that families may achieve economic self-sufficiency, as defined in Section 2-I.A. of this document.

2-I.C. BASIC REQUIREMENTS OF THE FSS PROGRAM [24 CFR 984.104]

An FSS Program established under 24 CFR Part 984 must operate in conformity with federal regulations [984.201], provide comprehensive supportive services [984.103], and operate in compliance with nondiscrimination and equal opportunity requirements.

PART II: SCOPE OF THE FSS PROGRAM

2-II.A. HOUSING-ASSISTED FAMILIES ELIGIBLE TO PARTICIPATE IN FSS

The Housing Choice Voucher (HCV) and Public Housing (PH) Programs, through which families are eligible to participate in the FSS Program, expanded by the 2018 Economic Growth Act to allow participants in HCV Homeownership, Moderate Rehabilitation, Moderate Rehabilitation Single Room Occupancy, and Family Unification Program (FUP), including the Foster Youth to Independence (FYI) Initiative.

2-II.B. HAS REQUIRED TO OPERATE AN FSS PROGRAM

Each HA that received funding for HCV vouchers and/or PH units, under the FY 1991 and FY 1992 FSS incentive award competitions, must operate an FSS program.

In addition, unless the HA receives an exemption under 24 CFR 984.105, each HA for which HUD reserved funding (budget authority) during FY 1993 through October 20, 1998, must operate an HCV FSS Program. Likewise, each HA for which HUD reserved funding (budget authority) to acquire or construct additional PH units in FY 1993 through October 20, 1998, must also operate a PH FSS Program.

Every HA that was required to administer an FSS Program on May 24, 2018 (the enactment date of the Economic Growth, Regulatory Relief, and Consumer Protection Act) must continue to operate that FSS Program for the total number of families determined by HUD on that date unless the PHA receives an exception as described in 24 CFR 984.105(d).

Mandatory Minimum Program Size (MMPS) [24 CFR 984.105]

HAs that are required to operate an FSS program under 24 CFR 984.101 are subject to a minimum program size requirement.

WVHA Minimum Program Size

The WVHA has no mandatory minimum program size requirement and operates a voluntary FSS Program.

2-II.C. COOPERATIVE AGREEMENTS [24 CFR 984.106]

A HA may enter into a Cooperative Agreement with one or more multifamily-assisted housing owners to voluntarily make the HA's FSS Program available to the owner's housing tenants. The Cooperative Agreement must include all the requirements for such agreements found in 24 CFR 984.106 and 24 CFR 887.107.

WVHA Policy

WVHA will not enter into a Cooperative Agreement with multifamily-assisted housing owners to voluntarily make its FSS Program available to those owner's housing residents.

2-II.D. ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)]

The HA must state the number of eligible FSS families who can reasonably be expected to receive supportive services under the FSS Program based on available and anticipated federal, tribal, state, local, and private resources.

WVHA Policy

45 eligible families can reasonably be expected to receive supportive services under the WVHA FSS Program, based on available and anticipated federal, tribal, state, local, and private resources.

2-II.E. ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201(d)(3)]

If applicable, the WVHA must enter the number of families, by program type, who are participating in any other local housing self-sufficiency program who are expected to agree to execute an FSS contract of participation.

WVHA Policy

The WVHA does not operate other self-sufficiency programs and therefore no additional families from other programs are expected to execute an FSS Contract of Participation.

2-II.F. ELIGIBILITY OF A COMBINED PROGRAM [24 CFR 984.201(e)]

A HA that wishes to operate a joint FSS Program with other HAs or owners of multifamily-assisted housing may combine its resources with one or more of these entities to deliver supportive services under a joint action plan that will provide for the establishment and operation of a combined FSS Program that meets the requirements of this part.

WVHA Policy

WVHA will not combine its resources with any other HA to deliver support services, have a joint action plan, or establish or operate a combined FSS Program.

PART III: Program Operation

2-III.A. OVERVIEW

Federal regulations specify requirements for FSS Program operation regarding deadlines for program start-up and when the HA is expected to have attained full enrollment. A timetable illustrating when the HA intends to meet these deadlines is included as part of the required contents of the action plan.

2-III.B. PROGRAM IMPLEMENTATION DEADLINE

The deadlines for program implementation differ depending on whether WVHA's FSS Program is voluntary or mandatory.

Voluntary Program [24 CFR 984.301(a)]

There is no deadline for the implementation of a voluntary program. However, a voluntary program may not be implemented before the requirements specified in 24 CFR 984.201 have been satisfied (see Sections 1-II.A.–1-II.D.).

2-III.C. TIMETABLE FOR PROGRAM IMPLEMENTATION [24 CFR 984.201(d)(13)]

A timetable for implementation of the FSS Program is part of the required contents of the FSS Action Plan.

WVHA Policy

WVHA functions under an already established FSS Program.

PART IV: DEFINITIONS

2-IV.A. DEFINITIONS [24 CFR 984.103]

The terms *1937 Act*, *fair market rent*, *HUD*, *low-income family*, *public housing*, *public housing agency (PHA)*, *secretary*, and *Housing Choice Voucher (HCV aka Section 8)*, as used in this document are defined in the 24 CFR Part 5.

The term *very low-income family* is defined in 24 CFR 813.102 and 24 CFR 913.102.

The terms used in this document have the following definitions as defined by 24 CFR 984.103 and this FSS Action Plan.

Baseline annual earned income means the FSS family's total annual earned income from wages and business income (if any) as of the effective date of the FSS contract. When calculating baseline annual earned income, all applicable exclusions of income must be applied, *except for* any disregarded earned income or other adjustments associated with self-sufficiency incentives that may apply to the determination of annual income.

Baseline monthly rent means 1) the FSS family's total tenant payment (TTP), as of the effective date of the FSS contract, for families paying an income-based rent as of the effective date of the

FSS contract; or 2) the amount of the flat or ceiling rent (which includes the applicable utility allowance), and including any hardship discounts, as of the effective date of the FSS contract. For families paying a flat or ceiling rent, this is as of the effective date of the FSS contract.

WVHA Policy

Benefits mean a government benefit of money or monetary value given to an individual by a federal, state, or local government agency for purposes of financial assistance, including but not limited to, Medicaid, Supplemental Nutritional Assistance Program (SNAP) benefits, and Social Security, Temporary Assistance for Needy Families (TANF), and unemployment compensation benefits.

WVHA Policy

A benefits cliff means the sudden and often unexpected decrease in public benefits that can occur with a small increase in earnings. When income increases, families sometimes lose some or all economic support.

WVHA Policy

Certain interim goals mean the family has met all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date.

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

Chief executive officer (CEO) means the CEO of a unit of general local government who is the elected official or the legally designated official having primary responsibility for the conduct of that entity's governmental affairs.

Contract of participation (CoP) means a contract in a form approved by HUD, entered into between a participating FSS family and a PHA operating an FSS Program that sets forth the terms and conditions governing participation in the FSS Program. The CoP includes all individual training and services plans entered in between the WVHA and all members of the family who will participate in the FSS Program, and which plans are attached to the CoP as exhibits. For additional detail, see 24 CFR 984.303.

Current annual earned income means the FSS family's total annual earned income from wages and business income (if any) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract. When calculating current annual earned income, all applicable exclusions of income will apply, including any disregarded earned income and other adjustments associated with self-sufficiency incentives or other alternative rent structures that may apply to the determination of annual income.

Current monthly rent means either the FSS family's TTP as of the most recent reexamination of income, which occurs after the effective date of the FSS contract, for families paying an income-based rent as of the most recent reexamination of income; or the amount of the flat rent, including applicable utility allowance or ceiling rent. This amount must include any hardship discounts, as of the most recent reexamination of income, which occurs after the effective date of

the FSS contract, for families paying a flat rent or ceiling rent as of the most recent reexamination of income.

Earned income means income or earnings included in annual income from wages, tips, salaries, other employee compensation, and self-employment. Earned income does not include any pension or annuity, transfer payments, any cash or in-kind benefits, or funds deposited in or accrued interest on the FSS Escrow Account established by WVHA on behalf of a participating family.

The effective date of the Contract of Participation means the first day of the month following the month in which the FSS family and the PHA entered into the contract of participation.

Eligible families for the FSS program mean current participants receiving assistance through the HCV or PH Programs.

WVHA Policy

Enhance the effectiveness of the FSS program means a demonstrable improvement in the quality of an FSS Program in which the enrollment ratio, escrow balance average, and graduation rate are at or above the national average as measured in HUD's Composite Scores in FR Notice 11/15/18.

Enrollment means the date that the FSS family entered the CoP with the WVHA.

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

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

FSS Escrow Credit means the amount credited by the HA to the participating family's FSS account.

FSS family means a family that receives HCV assistance or resides in PH, that elects to participate in the FSS Program, and whose designated adult member (head of FSS family) has signed the CoP.

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

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

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

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

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

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

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

WVHA Policy

Knowledgeable professional means a person who is knowledgeable about the situation has the training, education, certification, or licensure provided by recognized professional associations and institutions that legitimize their professional opinion, is competent to render a professional opinion, and is not able to gain, monetarily or otherwise, from the WVHA FSS program decision in the area to which they are certifying.

Multifamily-assisted housing, also known as project-based rental assistance (PBRA), means rental housing assisted by an HCV Program, under 24 CFR Parts 880, 881, 883, 884, and 886.

WVHA Policy

Other costs related to achieving obligations in the CoP mean any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP.

Owner means the owner of multifamily-assisted housing.

Participating family is defined as an *FSS family* in this section.

Program Coordinating Committee (PCC) means the committee described in 24 CFR 984.202.

Public Housing (PH) means housing assisted under the 1937 Act, excluding housing assisted under the HCVs of the 1937 Act.

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

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

WVHA Policy

Supports means, but is not limited to, transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator.

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

Unit size or *size of unit* refers to the number of bedrooms in a dwelling unit.

A very low-income family is defined as set out in 24 CFR 813.102

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

Chapter 3

PROGRAM ADMINISTRATION

INTRODUCTION

This chapter discusses administrative policies and practices as they are relevant to the activities covered in this plan. The policies and practices are discussed in two parts:

Part I: Staffing, Fees and Costs, and On-Site Facilities: This part describes identifying appropriate staff and contractors to operate the WVHA's FSS Program and provide the necessary direct services to FSS families. In addition, it describes how administrative fees, costs, and supportive services will be funded, and defines the use of on-site facilities.

Part II: The Program Coordinating Committee: This part covers the establishment of a Program Coordinating Committee (PCC), which is a regulatory requirement in all FSS Programs other than multifamily housing assistance. It describes required and recommended PCC membership, in addition to the option for an alternative committee.

PART I: STAFFING, FEES AND COSTS, AND ON-SITE FACILITIES

3-I.A. OVERVIEW

Several functions of program administration are crucial to running an FSS Program. A HA may need to employ an FSS Coordinator or decide to contract with another organization to administer the program. In addition to staffing issues, HAs should understand how program funding and expenses work to keep the program running smoothly. Finally, such agencies need to sort out whether and how to make common areas or unoccupied units available to provide supportive services.

3-I.B. PROGRAM ADMINISTRATION STAFF AND CONTRACTORS [24 CFR 984.301(b)]

WVHA has the choice between hiring staff or contracting with an outside organization to administer its FSS Program. If the HA should choose to employ its staff, the staffing levels should be appropriate and may include one or more FSS Coordinators. If the HA chooses to contract with an outside organization, the organization's staffing levels must likewise be appropriate to establish and administer the FSS program, and whether the organization's responsibilities would include managing the FSS account per federal regulations.

WVHA Policy

The WVHA will employ appropriate staff, including one or more FSS Coordinators to administer its FSS Program.

3-I.C. FSS PROGRAM COORDINATOR'S RESPONSIBILITIES

Primary Role of the FSS Program Coordinator

The FSS Program Coordinator is responsible for building partnerships with service providers in the community, working with the Program Coordinating Committee (PCC) and local service providers to ensure that FSS Program participants are linked to the supportive services they need to achieve self-sufficiency, preparing an Individual Training and Services Plan (ITSP) for the head of the FSS family and each adult member of the FSS family who elects to participate in the FSS Program, making certain that the services included in the participants' CoP are provided on a regular, ongoing, and satisfactory basis, ensuring FSS participants are fulfilling their responsibilities under the CoPs, monitoring the progress of participants, and establishing and properly maintaining FSS Escrow Accounts for eligible families. FSS Coordinators may also provide outreach, recruitment, goal setting, case management and coaching for FSS participants, and tracking of FSS Program performance.

FSS Program Coordinators funded under the FSS Coordinator Notice of Funding Opportunity (NOFO) may not perform the routine HCV or PH program functions of housing eligibility, leasing, rent calculation, and portability that are funded through HCV administrative fees or PH operating funds unless doing so would enhance the effectiveness of the program. If conducting these functions would enhance the effectiveness of the FSS Program, the WVHA must seek prior approval from HUD for those enhancements to the FSS program and certify that doing so will neither interfere with the FSS Coordinator's ability to fulfill their primary role nor be used to balance or fill in for gaps in traditional staffing.

Performance of routine HCV or PH functions for non-FSS families does not enhance the effectiveness of the FSS Program and is therefore an ineligible use of FSS funds [2021 FSS NOFO, p. 36].

WVHA Policy

WVHA will not require the FSS Program Coordinator to perform the routine HCV or PH Program functions of housing eligibility, leasing, rent calculation, and portability that are funded through HCV administrative fees or PH operating funds.

3-I.D. ADMINISTRATIVE FEES AND COSTS

The Consolidated Appropriations Act of 2014 combined funding streams for the HCV and PH FSS Programs. FSS funding is now awarded through one NOFO. Use of this funding is no longer restricted to the applicable program and funding now may be used to serve both HCV and PH FSS participants. Funding for FSS Coordinators' salary, benefits, and training as well as limited administrative costs are awarded through a Grant Agreement and disbursed through HUD's Line of Credit Control System (LOCCS), rather than as an amendment to the WVHA's Annual Contributions Contract (ACC). These funds are separate from other available funds that may be used.

Housing Choice Voucher (Section 8) FSS Program

In the HCV Programs, administrative fees are paid to WVHA for HUD-approved costs associated with the operation of an FSS Program. These administrative fees are established by Congress and subject to appropriations [24 CFR 984.302(b)].

In addition, administrative fees for HUD-approved costs not specifically related to the operation of the FSS Program may be used to cover these costs associated with the administration of FSS [see Notice PIH 93-24 E-7 and E-8].

See 24 CFR 982.152 and PIH 2022-18 for details on the eligible use of administrative fees.

Public Housing FSS Program

For PH FSS Programs, the performance funding system (PFS), provided under section 9(a) of the 1937 Act, provides for the reasonable and eligible administrative costs that the WVHA incurs in carrying out the program only when funds have been appropriated. However, WVHA may use other resources for this purpose [24 CFR 984.302(a)].

In other words, the WVHA may fund reasonable and eligible administrative costs in the FSS Program from the Operating Fund. However, these expenses will only be reimbursed in the operating subsidy when a current appropriations act allows it. In addition, WVHA may fund reasonable and eligible administrative costs from the Capital Fund. Administrative staffing costs may also be funded through HUD or other grant or foundation sources. This includes FSS Coordinator grants when available.

WVHA Policy

The WVHA will not make funds available from the HCV administrative fees, unrestricted net position, or PH operating fund to provide administrative costs for the FSS Program.

3-I.E. SUPPORTIVE SERVICES FEES AND COSTS

Housing Choice Voucher FSS Supportive Services

In the HCV Program, the WVHA may fund reasonable and eligible FSS supportive service costs in the FSS Program from an unrestricted net position [see Notice PIH 93-24, E-3].

WVHA may seek additional funds from HUD by submitting grant applications or seek grants from other sources when available.

In addition to unrestricted net position and other grant sources, forfeited FSS Escrow Accounts can fund FSS supportive services. See Section 6-I.E. for eligible supportive services costs.

Public Housing FSS Supportive Services

In PH, WVHA may fund reasonable and eligible FSS supportive service costs in the FSS Program from the Operating Fund. However, the costs of FSS supportive services are only reimbursed through the operating subsidy when appropriations allow it.

FSS PH supportive services can also be funded through other HUD grants or related government and foundation grants, when available.

WVHA Policy

WVHA will not make funds available from the HCV Administration Fees or PH Operating Fund to provide supportive service costs for the FSS Program.

3-I.F. USE OF FORFEITED FSS ACCOUNT FUNDS

In addition to grant funds, the forfeited FSS Escrow Account funds must be used for the benefit of FSS participants, which includes support and other costs for FSS participants in good standing. HUD does not provide an exhaustive list of these supports. However, the supports include, but are not limited to, transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP as well as training for FSS Program Coordinators.

WVHA Policy

The WVHA will use forfeited escrow accounts for support and other costs for FSS participants in good standing when funds requested are needed to complete an interim goal or task in the ITSP and are not ongoing expenses or if the family can demonstrate that the need for a one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals in the ITSP.

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

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

The WVHA will define *other costs related to achieving obligations in the CoP* as any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s).

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

The HA will provide funds from the forfeited escrow account to FSS participants in good standing before requiring the participant to use an “interim” disbursement from their current escrow account so long as:

The funds requested are needed to complete an interim goal or task within the CoP and are not ongoing expenses; or

If the family has demonstrated that the need for a one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.

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

Priority 1: Funds to meet a goal in the ITSP that is necessary to ensure the safety and wellbeing of victims of domestic violence, dating violence, sexual assault, and stalking as defined in WVHA's HCV Administrative Plan and PH Admissions and Continued Occupancy Policy regarding VAWA.

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

Priority 3: Funds to meet a goal in the ITSP that is necessary to further education, training, and employment goals in the ITSP including childcare, transportation, and medical costs if the lack of any of these prevents completion of the education, training, and employment.

Priority 4: Funds to meet a goal in the ITSP that is necessary to further any other goal or task.

3-I.G. ON-SITE FACILITIES

WVHA may, subject to the approval of HUD, make available and utilize common areas or unoccupied dwelling units in PH projects to provide supportive services under an FSS Program. This includes using such areas for participants in an HCV FSS program.

WVHA Policy

The WVHA will make *the LaCreole Manor, Kingwood West, and Pioneer Village Social Hall* available to provide supportive services under the HCV and PH FSS Program.

PART II: PROGRAM COORDINATING COMMITTEE

3-II.A. OVERVIEW

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

The PCC must consist of specific members, which are dependent upon whether the PHA is operating Section 8, public housing, or multifamily assisted housing FSS programs. In addition to these required members, the PCC may also include additional members recommended by regulation.

3-II.B. PROGRAM COORDINATING COMMITTEE MEMBERSHIP

Required PCC Membership [24 CFR 984.202(b)(1)]

The PCC required members consist of representatives from WVHA, including at least one FSS Program Coordinator, and one or more participants from each HUD rental assistance program (HCV and PH) served by the WVHA's FSS program.

WVHA Policy

WVHA's representative to the PCC will be the FSS Coordinator.

Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)]

The WVHA may seek assistance from area-wide, city-wide, or development-based resident councils, the resident management corporation, or the Resident Advisory Board, in identifying potential PCC members.

WVHA Policy

WVHA will seek assistance from their current FSS Program participants in identifying potential members of the PCC.

Recommended PCC Membership [24 CFR 984.202(b)(2)]

Membership in the PCC also may include representatives of the unit of general local government served by the HA, local agencies (if any) responsible for carrying out employment training programs or programs funded under the Workforce Innovation and Investment Act, and other organizations, such as state, local, or tribal welfare and employment agencies, public and private education or training institutions, child care providers, nonprofit service providers, private business, and any other public and private service providers with resources to assist the FSS Program.

WVHA Policy

WVHA's FSS Program PCC will include a partnership with the following organizations:

West Valley Housing Authority:

A family participating in the FSS Program will be in regular contact with the FSS Coordinator to develop and carry out the Individual Training and Services Plan. The coordinator will provide ongoing supervision of the participant's progress and act as an advocate to empower families toward self-sufficiency. In addition, the coordinator will initiate referrals, monitor other agency involvement, and track participant progress regularly. WVHA will assist qualifying individuals in establishing a savings account with the VIDA Program.

Chemeketa Community College:

Will provide career exploration; job search skills; goal setting; individualized academic assessments; advisement and action plans; Adult Basic Education courses; English as a Second Language course; etc.

WorkSource Willamette:

Will offer a FAST TRACK to receive assistance with resume building; application process; interview skills; and computer access to a government agency and online job listings. GED Readiness Program.

Goodwill Job Connection:

Offers job readiness training and Meet the Employer events; assists with job searches, resumes, mock interviews, clothing, etc.

MERIT:

MicroEnterprise Resources Initiatives and Training; help individuals explore, launch, and grow successful small businesses through training and support.

Dev NW:

This non-profit, merger of NEDCO and WNHS, assists families with credit problems by helping formulate budgets based on actual income, teaching them how to negotiate with creditors for payment of bills, and educating methods to achieve and maintain good credit. They offer courses on home ownership and small business start-up.

Mid-Willamette Valley Community Action Agency:

Offers cash assistance with expenses such as utility bills, rent payments, prescriptions, etc. Also, is a resource for the RENT Program, which consists of workshops aimed to teach individuals how to overcome common housing barriers such as poor rental histories, low credit scores, or criminal backgrounds.

Dallas Ministerial Association:

Offers one-time cash assistance to help families meet unexpected expenses.

Oregon Department of Human Services:

Provide cash grants for families who meet the guidelines, which include participation in the JOBS Program; assistance with employment-related daycare; SNAP Program, and TANF.

Willamette Valley Food Assistance Program:

A membership-based food cooperative that provides groceries for low-income families; shopping-style food distribution.

Polk County Behavioral Health:

Case managers serve individuals with mental health issues and/or disabilities. Services for families having trouble dealing with emotional issues, addictions, adult/child outpatient therapy, WRAP-around services, and crisis services.

Sable House:

Polk County's domestic violence shelter and counseling services.

VORP/Community Mediation Services of Polk County:

Specializes in Victim-Offender Mediation, Community Mediation, and Family Mediation. Provides training in conflict resolution.

Marion-Polk Legal Aid Services:

Provides legal counseling and/or representation for low-income families or individuals. Family law, housing, public benefits.

Polk County Service Integration (SIT) Team:

Provides a team approach for problem-solving for Polk County families who are experiencing system barriers. This network brings together staff from various local social service agencies to determine if there are creative approaches to better serve families in need.

Help and Hope to Others (H2O):

A local non-profit organization that runs a thrift store; provides furniture and clothing in emergencies; provides emergency food boxes.

Confederated Tribes of Grand Ronde Health & Wellness Center:

The tribal health department provides community health services for the Native American population, plus their non-native American community members. Provides social services, including cash assistance, to tribal members.

Oregon Child Development Coalition:

Early education programs serve 0-5-year-old children, Head Start, Services available to low-income families, including parenting skills classes, family and health services, mental health services, USDA Child and Adult Care Food Program, transportation services, and special education services.

Family Building Blocks:

Offers assistance for families with children ages Prenatal-5. Services include therapeutic classrooms, home visiting, parenting education, respite care, a food pantry, and a clothes closet.

Mid-Valley Parenting:

Offers parent education for families in Polk County.

Chemeketa Area Regional Transportation System (CARTS):

Provides public transportation by bus and dial-a-ride services, connecting cities in Polk County with the Salem area.

Cherriots:

Connects people with places through public transportation services. Provides bus service for a 76+ square mile area in Salem, Keizer, and the mid-Willamette Valley.

Marion-Polk MedLink:

Non-emergent medical transportation. Ride service for health care visits that the OHP cover.

3-II.C. ALTERNATIVE PCC COMMITTEE [24 CFR 984.202(c)]

It is also possible for the PHA, in consultation with the chief executive officer of the unit of general local government served by the PHA, to use an existing entity as the PCC, if the membership of the existing entity consists or will consist of the individuals required by regulation (See section 3-II.B. above).

WVHA Policy

The WVHA has selected the Polk County Service Integration Team (SIT) as their PCC. The SIT is an already existing entity, made up of various community partners and social service agencies that support low-income individuals and families.

Chapter 4

SELECTING AND SERVING FSS FAMILIES

INTRODUCTION

Within the action plan, regulations require HAs to include a statement indicating how they will select families for participation in the FSS Program. This includes outreach, waiting list management, and other selection procedures. When followed, the selection procedures ensure that families will be selected without regard to race, color, religion, sex, handicap, familial status, or national origin.

Once selected for participation in the FSS Program, families are offered various activities and supportive services through which they may obtain the education, employment, business, and social skills necessary to achieve self-sufficiency. A description of such activities and supportive services are also a requirement of the FSS Action Plan.

This chapter contains three parts:

Part I: Incentives, Outreach, and Assurance of Noninterference: This part describes the incentives that WVHA will offer, the outreach efforts that will be used to encourage participation and recruit eligible families for the FSS Program, and contains the required assurance of noninterference with the rights of nonparticipating families.

Part II: Family Selection: This part covers whether the WVHA will use preferences for family selection and which preferences it will employ if they choose to do so. In addition, this part describes the selection factors that WVHA will use in screening families for participation in the FSS Program.

Part III: Activities and Support Services: This part lists the activities and supportive services to be provided to families through both public and private resources, describes the method WVHA will use to identify family support needs, and covers the required certification of coordination.

PART I: INCENTIVES, OUTREACH, AND ASSURANCE OF NONINTERFERENCE

4-I.A. OVERVIEW

The FSS Program offers incentives such as the FSS Escrow Account, case management, coaching, and other supportive services that not only encourage participation but also help families achieve self-sufficiency. In addition to encouraging program participation through such incentives, WVHA performs outreach to recruit FSS participants from eligible families. As part of this process, families need to know that their choice to participate in the FSS Program will not affect their admission to the HCV or PH Programs, nor will it affect their right to occupancy. This part describes WVHA's policies regarding these issues, all of which are required aspects of the FSS Action Plan.

4-I.B. INCENTIVES FOR PARTICIPATION [24 984.201(d)(5)]

Per regulation, WVHA’s FSS Action Plan must include an incentives plan—a description of the incentives that the HA intends to offer eligible families to encourage their participation in the FSS Program. The incentives plan provides for the establishment of the FSS Escrow Account and any other incentives designed by the WVHA.

WVHA Policy

The WVHA will offer the following services to its FSS participants as incentives to participate in the program.

Incentive	Provided By	Description
FSS Escrow Account	WVHA/Accounting Department	A savings account where monthly deposits are made on the participant’s behalf based on increases in earned income and household rents.
Case management/Coaching	WVHA FSS Coordinator	Provides skill-building opportunities, and problem-solving strategies to elevate the participant’s standard of living.
Information and referrals to services	WVHA FSS Coordinator	Provides information/access to employment, education, job training, health and wellness, financial, home ownership, etc., services.
The Valley Individual Development Account (VIDA) Program	CASA of Oregon	A matched savings account program that helps individuals save for education, business start-up, home purchase, automobiles, etc.

4-I.C. OUTREACH EFFORTS [24 CFR 984.201(d)(6)(i)(ii)]

In addition to offering incentives for FSS participation, WVHA will also conduct outreach to recruit more FSS participants from eligible families. The FSS Action Plan must include a description of these efforts to recruit FSS participants, including notification and outreach, the actions that WVHA will take to assure that both minority and nonminority groups are informed about the FSS Program, and how they will make this information known.

WVHA Policy

Outreach efforts for the FSS Program may include but are not limited to mass mailings of program information to all current WVHA clients, informational flyers with applications included in Annual Rexam Packets, program information available on the WVHA

website, bulletin board advertisements, in-person presentations at HCV briefings and PH move-ins, and case worker referrals. 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. Clients may contact staff via our VRS system, 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 WVHA FSS Program provides reasonable accommodations for people with disabilities.

4-I.D. ASSURANCE OF NONINTERFERENCE WITH THE RIGHTS OF NONPARTICIPATING FAMILIES [24 CFR 984.201(d)(10)]

A family's housing assistance or admission into assisted housing should never depend on whether they choose to participate in the FSS Program, and HAs need to make this known as part of the recruitment process. For this reason, the WVHA's Action Plan must include an assurance that a family's decision to not participate in the FSS Program will not affect the family's admission to the HCV or PH Program, nor will it affect the family's right to occupancy under the lease.

WVHA Policy

Participation in the FSS Program is strictly voluntary. HCV participants and PH residents will be notified in all literature and in-person presentations related to the program that should they decide not to participate in the FSS Program, it will not affect their housing assistance. This material will also specify that the family will retain the right to occupancy according to their lease and family obligations contract.

PART II: FAMILY SELECTION

4-II.A. OVERVIEW

The FSS Action Plan is required to contain a statement indicating the procedures for selecting families for FSS Program participation, including a description of how the WVHA will do so without regard to race, color, religion, sex (including actual or perceived gender identity), familial status, or national origin. This part describes these procedures, considering whether the agency will use preferences for family selection and which preferences WVHA will employ if they choose to do so, in addition to defining the factors they will use in screening families for program participation.

4-II.B. FSS SELECTION PREFERENCES

As part of the process for selecting families for participation in the FSS Program, the HA may choose whether to employ the use of preferences. If the WVHA so chooses, it has the option of giving a selection preference for up to 50 percent of its FSS Program slots to eligible families who have one or more family members currently enrolled in an FSS-related service program or who are on the waiting list for such a program. Such a preference may be further limited to participants in and applicants for one or more specific eligible FSS-related service programs.

Should WVHA choose to adopt such a preference, it will need to include the following information in its action plan:

- The percentage of FSS slots, not to exceed 50 percent of the total number of FSS slots for each of its FSS Programs, for which it will give a selection preference
- The FSS-related service programs to which it will give a selection preference to the programs' participants and applicants
- The method of outreach to and selection of families with one or more members participating in the identified programs [24 CFR 984.203(a)]

The HA may wish to adopt additional selection preferences as well [Notice PIH 93-24].

WVHA Policy

The WVHA will not adopt the use of any other preferences when selecting families for participation in the FSS Program.

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

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

WVHA Policy

WVHA will add families to the FSS waitlist in the order in which their FSS Pre-applications are received. Then, they will be selected to enroll in the program as slots become available.

4-II.C. SELECTION FACTORS

Many factors contribute to whether the WVHA chooses to select a family for participation in the FSS Program. These selection factors can help the HA screen families for admission and ultimately contribute to the FSS Coordinator's decision to either allow or deny a family's admission into the FSS Program.

Motivation Selection Factors [24 CFR 984.203(d)(1)]

WVHA will screen families for interest and motivation to participate in their FSS Program provided that the utilized factors are those which solely measure the family's interest and motivation to participate in the FSS Program. For this reason, WVHA must only apply motivational screening factors that are permissible under the regulations.

Permissible Motivation Selection Factors

Permitted motivational factors include requiring attendance at FSS orientation sessions or pre-selection interviews or assigning certain tasks indicating the family's willingness to undertake the obligations that may be imposed by the FSS Contract of Participation. However, any tasks assigned should be readily accomplishable by the family based on the family members' educational level, abilities, or disabilities, if any. Reasonable accommodations must be made for

individuals whose disability (mobility, manual, sensory, speech impairments, mental, or developmental disabilities) creates a barrier to accomplishing the tasks [24 CFR 984.203(d)(2)].

WVHA Policy

The WVHA will screen prospective families for interest and motivation to participate in the FSS Program first with a completed FSS Pre-application, then by assigning an orientation interview. During the interview, the FSS Coordinator will familiarize the family with the nature of WVHA's FSS Program, incentives, and requirements. The coordinator will only use the fact that the family attended the interview as a screening factor, even if the family completes the enrollment packet during the meeting. In addition, if the family is unable to attend an in-person meeting, the FSS Coordinator will conduct a telephone or in-home interview.

Prohibited Motivation Selection Factors

Prohibited motivational screening factors include the family's educational level, educational or standardized motivational test results, previous job history or job performance, credit rating, marital status, number of children, or other factors, such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or nonminority groups [24 CFR 984.203(d)(3)].

Other Selection Factors

In addition to motivational screening, the WVHA may also wish to screen families for the following additional factors.

PHA Debt Selection Factor

WVHA may deny FSS participation to a family if the family owes them, or another HA, money in connection with HCV or PH assistance [Notice PIH 93-24, B-18].

WVHA Policy

The WVHA will deny FSS participation to a family if the family owes them, or another HA, money in connection with HCV or PH assistance. Families that owe money to a HA who have entered into a repayment agreement and are current on that repayment agreement will not be denied FSS participation.

Unavailable Support Services Selection Factor

If WVHA determines, after consulting with the family, that a missing service is essential to the family's needs, the HA may skip that family (and other similar families) and offer the FSS slot to the next family for which there are available services [Notice PIH 93-24, B-8].

WVHA Policy

In the cases where support services are unavailable for the family's specific needs, the WVHA will skip the family and offer the slot to the next family for which there are available services.

Previous Participation Selection Factor

WVHA may refuse to select a family for participation in the FSS Program a second time if that family previously participated unsuccessfully (i.e., the family participated, did not meet its FSS obligations, and was terminated from the FSS Program) [Notice PIH 93-24, B-14].

WVHA Policy

The WVHA will not select a family for participation in the FSS Program a second time if that family previously participated, completed the CoP, and received a final distribution of their escrow account; however, for families that did complete the CoP, but did not receive any escrow shall be eligible to participate again.

Furthermore, if a family voluntarily terminates their CoP, they will be allowed another opportunity to participate in the FSS Program without a waiting period. In contrast, should the family's contract be terminated due to a failure to uphold the requirements of the program, they must wait a least one year before they will be eligible to participate again.

4-II.D. SELECTION OF HEAD OF HOUSEHOLD

Each eligible family that is selected to participate in an FSS Program must enter a Contract of Participation (CoP) with the WVHA. There will be no more than one contract at any time for each family. There may be an ITSP for as many members of the family who wish to participate. The contract shall be signed by a representative of WVHA and the head of the FSS family, as designated by the family. This head of the FSS family does not have to be the same as the official head of household for rental assistance purposes [24 CFR 984.303(a)].

WVHA Policy

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

PART III: ACTIVITIES AND SUPPORT SERVICES

4-III.A. OVERVIEW

Once families are admitted to the FSS Program, the WVHA becomes responsible for making sure these families are adequately served. The purpose of the program is to promote the development of local strategies; coordinate the use of HCV and PH assistance programs with public and private resources, and enable families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency. As such, upon selection, families are matched with the appropriate activities and supportive services so that they may obtain the education, employment, business, and social skills necessary to achieve self-sufficiency; which is a vital element of the FSS Program. The WVHA must make a good faith effort to replace the obtained services from another agency.

4-III.B. METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS
[24 CFR 984.201(d)(8)]

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

WVHA Policy

Supportive services needs will be identified by completion of the FSS Initial Needs Assessment with the FSS Coordinator, case manager, or coach before completion of the Individual Training and Services Plan (ITSP) and signing of the CoP.

4-III.C. FSS ACTIVITIES AND SUPPORT SERVICES DESCRIPTION
[24 CFR 984.201(d)(7)]

As part of the required contents of the action plan, HAs must both describe the activities and supportive services to be provided by public and private resources to FSS families and identify the public and private resources that are expected to provide the supportive services.

Of course, this task assumes that the HA has first identified the needed activities and supportive services.

WVHA Policy

The WVHA’s FSS Program, through its partners on the PCC, will provide the following activities and support services to FSS families:

Support Service General	Support Service Specific	Source/Partner
Assessments	<ul style="list-style-type: none"> · Vocational · Educational · Vocational Planning · Educational Planning · Disability · Disability Vocational/Planning · Disability Education/Planning · Drug/Alcohol · Drug/Alcohol Recovery Planning 	<ul style="list-style-type: none"> · Career Center · Community College · Community-Based Organizations · Community College · Vocational Rehabilitation · Health Department
Education	<ul style="list-style-type: none"> · High School · English as a Second Language · GED · Apprenticeships · College 	<ul style="list-style-type: none"> · High School · Community College · Training Center · University

Support Service General	Support Service Specific	Source/Partner
Training	<ul style="list-style-type: none"> ·Skills Training ·Emerging Technologies Training ·Biomedical Training ·On-the-Job Training 	<ul style="list-style-type: none"> ·Adult Basic Education ·Community College ·University ·Community-Based Organizations ·Workforce
Job Search Assistance	<ul style="list-style-type: none"> ·Resume Preparation ·Interviewing Skills ·Workplace Skills ·Job Development ·Job Placement 	<ul style="list-style-type: none"> ·Community College ·University ·Community-Based Organizations ·WorkSource
Transportation	<ul style="list-style-type: none"> ·Bus ·Medical Transport 	<ul style="list-style-type: none"> ·Regional Transit System ·MedLink
Health Care	<ul style="list-style-type: none"> ·Alcohol and Drug Prevention ·Alcohol and Drug Treatment ·Mental Health ·Physical Health 	<ul style="list-style-type: none"> ·HMO ·Health Department ·Community Clinic ·General Hospital
Child Care	<ul style="list-style-type: none"> ·Infant/Toddler Care ·Preschool Care ·Afterschool Care ·Homework Assistance 	<ul style="list-style-type: none"> ·Child Care Resource ·Department of Human Services ·Public Schools
Financial Literacy	<ul style="list-style-type: none"> ·Financial Education ·Financial Coaching ·Debt Resolution ·Credit Repair 	<ul style="list-style-type: none"> ·Community-Based Organizations ·Online Courses
Legal Services	<ul style="list-style-type: none"> ·Representation ·Document Review ·Counsel or Advice 	<ul style="list-style-type: none"> ·Legal Aid ·State Bar Program
Child/Adult Protective Services	<ul style="list-style-type: none"> ·Needs Assessment ·Case Planning ·Information Referral ·Crisis Management 	<ul style="list-style-type: none"> ·Senior Services ·Adult/Family Services ·Child/Adult Abuse Hotline ·Local Shelters ·Foster Care ·Adoption Services

Support Service General	Support Service Specific	Source/Partner
Crisis Services	<ul style="list-style-type: none"> ·Crisis Assessment ·Crisis Intervention ·Crisis Management ·Crisis Resolution 	<ul style="list-style-type: none"> ·Crisis Team ·Senior Crisis Team ·Poison Control Center ·Domestic Violence Shelter
Mentoring	<ul style="list-style-type: none"> ·Mentoring ·Coaching 	<ul style="list-style-type: none"> ·Community College ·Department of Human Services ·Youth Programs ·Community-Based Organizations
Micro and Small Business Development	<ul style="list-style-type: none"> ·Training ·Planning ·Technical Assistance ·Mentoring 	<ul style="list-style-type: none"> ·Microbusiness Assistance Program ·Local Non-Profit Agencies
Homeownership	<ul style="list-style-type: none"> ·Training ·Planning ·Debt Resolution 	<ul style="list-style-type: none"> ·Public Housing Authority ·Housing Counseling Organizations ·Community-Based Organizations
Individual Development Accounts	<ul style="list-style-type: none"> ·Match Savings Accounts Distribution of IDA Funds 	<ul style="list-style-type: none"> ·Public Housing Authority ·TANF ·Community-Based Organizations ·Non-Profit Organizations

4-III.D. CERTIFICATION OF COORDINATION [24 CFR 984.201(D)(12)]

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

WVHA Policy

WVHA certifies that its FSS Program has developed its services and activities in coordination with programs under Title I of the Workforce Innovation and Opportunity Act, Workforce Investment Board and American Job Centers (also known as Workforce Centers or One-Stop Career Centers), and any other relevant employment, child care,

transportation, training, and education programs in the applicable area. The implementation of these activities and services will continue to be coordinated in this manner to avoid duplication of activities and services.

Chapter 5

CONTRACT OF PARTICIPATION

INTRODUCTION

Each family that is selected to participate in the FSS Program must enter into a Contract of Participation (CoP) with WVHA which is signed by the head of the FSS family. It sets forth the principal terms and conditions governing participation in the FSS Program. The contract includes the rights and responsibilities of the FSS family and of WVHA, the services to be provided and completed by the head, and each adult member of the family who elects to participate in the FSS Program. The CoP also incorporates the Individual Training and Services Plan (ITSP). [24 CFR 984.303].

This chapter contains two parts:

Part I: Overview and Family Obligations: This part provides an overview of the form and content of the CoP and describes what the contract requires of FSS families.

Part II: Contract Specifications: This part explains the specifications of the contract, including terms and conditions, contract modification, contract terminations, and grievance procedures.

PART I: OVERVIEW AND FAMILY OBLIGATIONS

5-I.A. OVERVIEW

The purpose of the FSS CoP is to set forth the principal terms and conditions governing participation in the FSS Program, including the incorporation of the ITSP as part of the contract's required contents. The ITSP is meant to establish goals the FSS family will meet along the way to completing the contract and becoming self-sufficient. In addition to the goals specified in the ITSP, the contract also lists the responsibilities of the family and WVHA. This part covers the ITSP as part of the required contents of the CoP, and the family's obligations under the contract.

5-I.B. CONTENTS OF THE CONTRACT OF PARTICIPATION

Individual Training and Services Plan

There will only ever be one FSS Contract of Participation (CoP) at any time for each FSS family. As part of the required contents of the contract, the Individual Training and Services Plan (ITSP) establishes specific interim and final goals by which WVHA and the family measure the family's progress toward fulfilling its obligations under the CoP and becoming self-sufficient. Interim and final goals will differ depending on the family's individual needs. Regulations require the establishment of a final goal that includes both employment for the head of the FSS family and independence from welfare assistance for all family members regardless of age.

Interim Goals [24 CFR 984.303(b)(2)]

WVHA must work with each participant to establish realistic and individualized goals and may not include additional mandatory goals or mandatory modifications of the two mandatory goals.

Individual Training and Service Plans for Other than FSS Head [24 CFR 984.103]

An ITSP is required for the head of the FSS family and all adults choosing to participate. ITSPs must be prepared by WVHA and in consultation with each adult family member that volunteers to participate in the program. [Notice PIH 93-24, G-16].

5-I.C. FAMILY OBLIGATIONS

Compliance with Lease Terms [24 CFR 984.303(b)(3)]

One of the obligations of the FSS family according to the Contract of Participation (CoP) is to comply with the terms and conditions of the Housing Choice Voucher (HCV) or Public Housing (PH) lease.

Inability to comply with the lease represents an inability to comply with the contract, therefore regulations regarding noncompliance with the FSS contract apply [see 24 CFR 984.303(b)(5)]. It is up to the WVHA to determine the plan of action for FSS families found in noncompliance with the lease and how the HA will precisely define the term *comply with the lease*. All considerations allowed for other assisted residents regarding violations of the lease must also be allowed for FSS participants.

WVHA Policy

The WVHA will define *comply with the lease* to mean the FSS family has not been evicted for repeated or serious violations of the lease as defined in the HCV Administration Plan and PH Admissions and Continued Occupancy Policy; or if they have been evicted for repeated and serious violations of the lease, the family has pursued their right to grieve, and the family has prevailed in either the grievance hearing or the informal hearing process.

The WVHA's FSS Program will terminate the FSS CoP for a failure to comply with the terms of the lease.

Employment Obligation [24 CFR 984.303 (b)(4)]

Another obligation set forth by the Contract of Participation (CoP) is for the head of the FSS family to *seek and maintain suitable employment* during the term of the contract and any extension. Although other members of the FSS family may seek and maintain suitable employment during the term of the contract, it is only a requirement for the head of the FSS family.

The obligation for the head of the FSS family to *seek employment* is defined in the regulatory language as meaning that the head of the FSS family has searched for jobs, applied for employment, attended job interviews, and has otherwise followed through on employment opportunities. However, this definition still leaves room for policy decisions on the part of the WVHA because it does not define the level of activity involved in "seeking."

There is no regulatory definition of *maintain suitable employment*. For this reason, it is up to the HA to define the term. However, there can be no minimum period of time that the head of the FSS family must work.

With the agreement of the FSS family member, WVHA will decide what it means to maintain suitable employment based on the skills, education, and job training of the FSS head of

household, receipt of other benefits of the family member, and the available job opportunities within the jurisdiction served by WVHA. This means that the HA must consult with the family member and an agreement must be reached as to what *maintain suitable employment* is for that family member [24 CFR 984.303 (b)(4), Notice PIH 93-24, G-3].

WVHA Policy

For purposes of WVHA's FSS Program, *seek employment* means the head of household has applied for employment, attended job interviews, and otherwise followed through on employment opportunities as outlined in the ITSP of their CoP.

Maintain suitable employment is employment, on the last day of the contract, that is outlined in the individual training and service plan and is based on the skills, education, job training, and receipt of other benefits of the head of the FSS family. The HA will require verification of this employment or enrollment.

5-I.D. CONSEQUENCES OF NONCOMPLIANCE WITH THE CONTRACT

Consequences apply to families who do not meet the terms and conditions of the contract. The regulations require that the Contract of Participation (CoP) specify that if the FSS family fails to comply, without good cause, with the terms and conditions of the contract (including compliance with the HCV and PH lease), the WVHA may:

- Withhold supportive services
- Terminate the family's participation in the FSS Program.

WVHA is not permitted to terminate a family's housing assistance due to the family's failure to meet its obligations under the CoP. [24 CFR 984.101(d)].

WVHA Policy

The CoP will be terminated before the expiration of the contract term if the participant fails to meet, without "good cause," their obligations as outlined in the CoP. If the participant fails to meet the obligations outlined in the CoP, the FSS Coordinator, or their designee, will first meet with the family to reassess the need for supportive services or a change in the Individual Training and Services Plan (ITSP).

If a reassessment of supportive services and a change in the ITSP is not successful in bringing the family into compliance, the FSS Coordinator will attempt to locate additional resources and support services that may remove the challenge so the participant can meet their obligations outlined in the CoP.

Finally, if neither of these alternatives is successful, the FSS Coordinator will terminate the CoP for failure to complete the tasks, interim goals, or final goals of the ITSP on time, and thus fail to complete the obligations outlined in the CoP.

The FSS Coordinator will make an exception to the actions in terminating the CoP if the participant can, with the assistance of the FSS Coordinator, demonstrate "good cause" for the failure to meet its obligations as outlined in the CoP.

For purposes of the WVHA FSS Program, *good cause* includes circumstances beyond the control of the FSS family:

Family circumstances

Death in the family

Serious illness

Medical emergency

Mandatory court appearances

Involuntary loss of employment

Loss of head of household through death, incarceration, or removal from lease

Change in the ITSP improving progress toward economic self-sufficiency

Community circumstances

Significant reduction in workforce (over 20 percent reduction in employment field)

A significant interruption in service delivery (over 3 months interruption)

Provider noncompliance with regulation

Provider unable or unwilling to provide service

Provider offering inferior service

Active pursuit of a current or additional self-sufficiency goal

Resolution of a barrier to employment

Completion of a college degree or technical training

Completion of a work-related certification

Credit repair toward homeownership readiness

PART II: CONTRACT SPECIFICATIONS

5-II.A. OVERVIEW

In addition to making clear the family's obligations under the program, the Contract of Participation (CoP) contains specific terms and conditions, including those governing contract modifications, terminations, and grievance procedures. This part describes those specifications and associated policies.

5-II.B. CONTRACT TERM [24 CFR 984.303(c)]

The contract term is five years. This means that each family will be required to fulfill the obligations specified in the CoP no later than 5 years after the first reexamination of income after the execution date of the contract. This five-year term requirement will be specified in the CoP.

Contract Extension [24 CFR 984.303(d)]

While the term outlined in the CoP is for five years, contract extensions are available. According to regulation, WVHA must, for *good cause*, extend the term of the contract for a period not to exceed two years for any FSS family that requests an extension in writing or verbally. The family's written or verbal (documented by the FSS Coordinator) 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 WVHA, such as a serious illness or involuntary loss of employment (further defined by PHA policy in Section 5-I.D.). Extension of the CoP will entitle the FSS family to continue to have amounts credited to the family's FSS Escrow Account.

5-II.C. MODIFICATION OF THE CONTRACT

The Contract of Participation (CoP) may be modified, as long as the PHA and the FSS family mutually agree to modify it. This includes modifications in writing to the Individual Training and Services Plans (ITSPs), the contract term (See Section 5-II.B. above), and the designation of the head of the family [24 CFR 984.303(f)]. The conditions under which the HA will modify the contract are outlined in the policy below.

WVHA Policy

In WVHA's FSS program, the CoP will be modified by mutual agreement between the HA and the FSS head of household:

When modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency.

When the actual end date of the CoP is determined by the effective date of the FSS family's first reexamination changes the end date of the CoP.

When the designated head of the FSS family ceases to reside with other family members in the assisted unit, the remaining family members designate another family member to be the FSS head of household and receive escrow funds.

When an FSS family moves to the jurisdiction of a receiving HA that does not have an FSS Program, a modification of the FSS contract may be made if it will allow the family to complete the contract and receive an escrow disbursement or terminate the contract with escrow disbursement.

5-II.D. COMPLETION OF THE CONTRACT

By regulation, the Contract of Participation (CoP) is considered to be completed when the head of household is employed and the FSS family has fulfilled all of its obligations under the contract, including all family members' ITSPs, on or before the expiration of the CoP term, including any extension thereof.

Policies on verifying completion of the CoP can be found in Section 6-I.C. of this action plan.

5-II.E. TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE

Even after a family has completed the CoP, WVHA may continue to offer appropriate FSS supportive services to a former completed FSS family. If the family still resides in PH or HCV-assisted units, these supportive services would be offered for becoming self-sufficient. If the

family no longer resides in PH or HCV-assisted units, these supportive services would be offered for becoming self-sufficient or remaining self-sufficient. Transitional services for families who no longer receive housing assistance may only be offered using sources that are not HUD funds or HUD restricted funds [24 CFR 984.303(j)].

PHA Policy

The PHA will continue to offer supportive services to a former FSS family who has completed its CoP.

5-II.F. TERMINATION OF THE CONTRACT

Termination of the Contract with Escrow Distribution [24 CFR 984.303(k)]

The Contract of Participation (CoP) will be terminated with escrow distribution before the expiration of the contract term, during any extension of the contract, or at end of the term of the contract if all obligations under such have not been met, when:

- Services that the PHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable, as described in Section 5-II.H. of this Action Plan. This type of termination is also referred to as "nullification" in the FSS regulations at 24 CFR 984
- The head of the FSS family becomes permanently disabled and unable to work during the period of the contract unless the WVHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family
- An FSS family in good standing moves outside the jurisdiction of WVHA(per portability requirements at 24 CFR 982.353) for a good cause and the continuation of the CoP after the move or completion of the CoP before the move is not possible. PHAs must be consistent in their determinations of whether a family has good cause for termination with FSS escrow disbursement.

Termination of the Contract without Escrow Distribution [24 CFR 984.303(h)]

The CoP may be terminated before the expiration of the contract term and any extension of the contract by the following:

- Mutual consent of the parties
- Failure of the FSS family to meet its obligations under the CoP without good cause
- The family's withdrawal from the FSS Program
- Such other action is deemed inconsistent with the purpose of the FSS Program
- Operation of law

WVHA Policy

The CoP will be terminated before the expiration of the contract term, and any extension thereof, for any of the following reasons

Mutual consent of the parties.

Family's withdrawal from the FSS Program

Failure of the FSS family to meet its obligations under the CoP without good cause. *Good cause* for the FSS Program is also defined in Section 5-I.D. of this Action Plan.

Such other action is deemed inconsistent with the purpose of the FSS Program.

Operation of law.

The head of the FSS family becomes permanently disabled and other family members will not participate in FSS as the head of the FSS family.

In an HCV FSS Program, failure to comply with the contract requirements because the family has moved outside the jurisdiction of WVHA under portability without continued FSS participation.

If the FSS family faces termination due to failing to meet, without good cause, its obligations under the CoP, the WVHA will follow the relevant policy specified in Section 5-I.D. of this Action Plan.

Note: If the family is unable to meet the requirements of the CoP because essential services are not available, the contract is *nullified*, not terminated.

In addition, the CoP is automatically terminated if the family's housing assistance is terminated per HUD requirements [24 CFR 984.303(h)].

5-II.G. OPTION TO WITHHOLD SUPPORTIVE SERVICE [24 CFR 984.303(b)(5)(i)]

As touched upon in Section 5-I.D. of this Action Plan, WVHA has the option to withhold supportive services or the FSS family's participation in the FSS Program if the HA determines that the FSS family has failed to comply without good cause with the requirements of the CoP.

PHAs are not permitted to terminate housing assistance to a family due to the family's failure to meet its obligations under the contract of participation [24 CFR 984.101(d)].

5-II.H. HA OBLIGATION TO MAKE GOOD FAITH EFFORT TO REPLACE UNAVAILABLE SUPPORT SERVICES [24 CFR 984.303(e)]

WVHA must make an extensive good faith effort to replace services that community agencies either cannot or will not provide. If all of the steps below are exhausted without the provision of an integral service, the Contract of Participation (CoP) can be ended ahead of time as a result. This, however, should only occur as a last resort. The WVHA's good faith effort must be demonstrated by taking the following steps:

- If a social service agency fails to deliver the supportive services pledged under an FSS family member's Individual Training and Services Plan (ITSP), WVHA must make a good faith effort to obtain these services from another agency.
- If the WVHA is unable to obtain the services from another agency, the HA must reassess the family member's needs and determine whether other available services would achieve the same purpose.
- If other available services would not achieve the same purpose, the WVHA shall determine whether the unavailable services are integral to the FSS family's advancement or progress toward self-sufficiency.

- If the unavailable services are not integral to the FSS family’s advancement toward self-sufficiency, the HA must revise the ITSP, delete these services, and modify the CoP to remove any obligation on the part of the FSS family to accept the unavailable services.
- If the unavailable services *are* determined to be integral to the FSS family’s advancement toward self-sufficiency (which may be the case if the affected family member is the head of the FSS family), the WVHA shall terminate the CoP and follow the requirements in Section 5-II.F. of this Action Plan.

Termination of the CoP based on the unavailability of supportive services shall never be grounds for termination of HCV or PH assistance.

5-II.I. GRIEVANCE PROCEDURES

When adverse action is taken by the WVHA against a family, the HA is required to provide a grievance hearing in the PH Program, or an informal hearing in the HCV Program [24 CFR 966 subpart B, 24 CFR 982.554].

According to regulatory requirements, the FSS Action Plan must contain the grievance and hearing procedures available for FSS families against whom the HA has taken adverse action with regards to FSS [24 CFR 984.201(d)(9)].

WVHA Policy

The grievance and informal hearing procedures for the FSS Program will be the same as the grievance and hearing procedures adopted for the HCV and PH Programs in the WVHA’s Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan (Admin. Plan), respectively (See pages *Chapter 14 of the ACOP and/or Chapter 16~Part 3 of the Admin. Plan*).

Adverse actions taken within the FSS Program include:

- Denial of admission into the FSS Program
- Denial of request for supportive services
- Denial of request to change the ITSP
- Denial of request to change the head of household
- Denial of request for interim disbursement of the escrow account
- Denial of request to complete the CoP
- Denial of a request for an extension to the FSS CoP
- Denial of request for either interim or final distribution of escrow account
- Withholding of support services
- Termination of the FSS CoP
- Denial of request for termination with escrow
- Denial of transitional services

Chapter 6

ESCROW ACCOUNT

INTRODUCTION

The establishment of an escrow account is offered as a support and financial incentive to families for participation in WVHA FSS Program. Generally, under this incentive, the amount of an increase in family rent resulting from an increase in earned income is escrowed. That is, usually, a family's rent or share of the rent goes up when the family experiences an increase in earned income. In the FSS Program, this is still the case, and the part of the rent representing the increase is deposited into an account as an escrow credit. The funds from this escrow account then become available to FSS families upon successful completion of their Contracts of Participation (CoP) and may become available earlier at WVHA's discretion.

This chapter explains how the FSS Escrow Account works, including calculating the amount of the escrow credit, disbursing the funds, and the proper way for the WVHA to manage and report on the account.

This chapter contains two parts:

Part I: The Escrow Account: This part provides an overview of how the escrow account works, including calculating the escrow credit and disbursing the funds upon completion of the CoP.

Part II: Escrow Fund Accounting and Reporting: This part describes the requirements for managing the escrow account, including both accounting and reporting requirements.

PART I: THE ESCROW ACCOUNT

6-I.A. OVERVIEW

As an integral incentive to the FSS program, it is especially important to have clear-cut policy spelling out how the escrow account works. This includes policy regarding the calculation of the FSS credit amount, the disbursement of FSS account funds, the use of account funds for homeownership, and forfeiture of the FSS Escrow Account.

6-I.B. CALCULATING THE FSS CREDIT AMOUNT

Determination of Baseline Annual Earned Income and Baseline Monthly Rent

When determining the family's baseline annual earned income and the baseline monthly rent amounts for purposes of computing the FSS escrow credit, the WVHA must use the amounts on the family's most recent income reexamination in effect.

For purposes of determining the FSS credit, baseline monthly rent for families paying an income-based rent is the family's Total Tenant Payment (TTP) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract.

For families in Public Housing (PH) who are paying either flat or ceiling rent, family rent is the amount of the flat rent (including the applicable utility allowance) or ceiling rent (including any

hardship discounts) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract [24 CFR 984.103(b)].

Determination of the Escrow Credit

To calculate the FSS credit, the WVHA must accurately determine the family's baseline earned income and baseline monthly rent and compare those figures with the family's current earned income and current monthly rent. The FSS credit is the lesser of 30 percent of one-twelfth or 2.5 percent of the amount by which the family's current annual earned income exceeds the family's baseline annual earned income; or the increase in the family's monthly rent. The increase in the family's monthly rent is the lower of either the amount by which the family's current monthly rent exceeds the family's baseline monthly rent or for Housing Choice Voucher (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 [24 CFR 984.305(b)(2)].

Determination of Escrow Credit for Families Who Are Not Low Income

FSS families who are not low-income families are not entitled to any FSS credit [24 CFR 984.305(b)(2)].

Increases in FSS Family Income [24 CFR 984.304]

As described in the FSS credit calculations above, any family increases in earned income resulting in increases in family rent are deposited in the escrow account. For this reason, and because of the nature of the FSS account, any increase in the earned income of an FSS family during its participation in an FSS Program may not be considered as income or an asset for purposes of eligibility of the FSS family for other benefits, or amount of benefits payable to the FSS family, under any other program administered by HUD.

Cessation of FSS Credit [24 CFR 984.305(b)(4)]

The WVHA will not make any additional credits to the family's escrow account when the family has completed the CoP, when the contract is terminated, when the family is not low-income, or during the time an HCV family is in the process of moving to a new unit.

6-I.C. DISBURSEMENT OF FSS ACCOUNT FUNDS

Disbursement Before Completion of Contract

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

WVHA Policy

The WVHA will disburse a portion of the FSS Escrow Account funds before completion of the CoP when the family has met certain interim goals, which means the family has met all of its obligations under the CoP, including completion of the ITSP interim goals and tasks to date, and:

Requested funds are needed to complete an interim goal or task within the CoP and are not ongoing expenses.

OR

The family has demonstrated that the need for a one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals as outlined in the ITSP.

Disbursement at Completion of Contract [24 CFR 984.305(c)(1) and 24 984.305(c)(2)(i)]

When the CoP has been completed, at or before the expiration date, according to regulation, the amount in the FSS account above any amount the FSS family owes to the WVHA will be paid to the head of the FSS family. To receive the disbursement, the head of the FSS family must submit a certification (as defined in 24 CFR 984.103) to the HA at the time of contract completion that, to the best of his or her knowledge and belief, no member of the FSS family is a recipient of welfare assistance.

Disbursement at Contract Termination [24 CFR 984.305(c)(3)]

The WVHA must disburse to the family its FSS Escrow Account funds over any amount owed to HA when the contract has been terminated in certain circumstances. These circumstances include services that are not available to the family that WVHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency, when the head of the FSS family becomes permanently disabled and unable to work during the period of the contract (unless the PHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family), or when an FSS family moves outside the jurisdiction of the HA and continuation of the CoP after the move is not possible according to the regulations. In circumstances where a family is not able to continue in FSS after the move, it is also possible for WVHA and the family to determine if the contract can be modified to make completion and receipt of the escrow monies, possible. The WVHA must be consistent in their determinations of whether a family has good cause for termination with FSS escrow disbursement.

Verification of Family Certification at Disbursement

The WVHA must verify that the family has met the requirements of either interim, final, or termination of the contract with escrow. Interim disbursement may only occur after the family has completed certain interim goals and funds are needed to complete other interim goals. Final disbursement can only occur after the family has completed the CoP and all members are welfare-free as defined by regulation. Disbursement at contract termination only occurs if the family circumstances involve an integral missing service, the disability of the FSS head of household, or an FSS family porting out of the jurisdiction of WVHA, and HUD regulations do not allow continuation of the FSS contract. In each of these circumstances, it follows that the HA may require verification for the completion of interim goals or the CoP.

At interim disbursement and before final disbursement of the FSS account funds to the family, the WVHA must verify that the FSS family is no longer a recipient of welfare assistance by requesting copies of any documents which may indicate whether the family is receiving any welfare assistance, and by contacting welfare agencies [24 CFR 984.305(c)(4)].

HUD provides verification guidance in Notice PIH 2018-18. This guidance is mandatory for the HCV and PH Programs. The WVHA's Administrative Plan or ACOP must contain verification policies following the hierarchy in this notice. The policies contained in WVHA's ACOP and Administrative Plan cover verification policies related to the FSS Program in general. However, determining the need for interim disbursements may require more clarification as to what constitutes an acceptable third-party source.

WVHA Policy

The WVHA will require verification that the FSS family has completed certain interim goals, has completed the CoP, or has met the requirements for termination with the disbursement of escrow; plus, the FSS family must provide proof that they are no longer recipients of welfare assistance, as relevant, before making interim and final disbursements.

The HA will follow HUD's verification hierarchy outlined in Notice PIH 2018-18 to make these verifications, including the guidance therein regarding documentation. However, WVHA may use a *knowledgeable professional* as a third-party source to verify the need for interim disbursements.

Succession to FSS Account [24 CFR 984.305(d)]

FSS account funds should be disbursed to the head of the FSS family. However, if the head of the FSS family no longer resides with the other family members in WVHA-assisted units, the remaining members of the FSS family, after consultation with the HA, have the right to designate another family member to receive the funds.

6-I.D. USE OF FSS ACCOUNT FUNDS FOR HOMEOWNERSHIP

According to regulation, HCV and PH FSS families may use the final distribution of FSS account funds for the purchase of a home, including the purchase of a home under one of HUD's homeownership programs, or other federal, state, or local homeownership programs, unless the use is prohibited by the statute or regulations governing the particular homeownership program [24 CFR 984.305(e)].

Homeownership is just one option for use of the FSS account funds. WVHA may not restrict the use of escrow funds at contract completion [Notice PIH 93-24, C-13].

6-I.E. USE OF FORFEITURE OF FSS ACCOUNT FUNDS

Amounts in the FSS account will be forfeited when the Contract of Participation (CoP) is terminated without escrow disbursement, or when the contract is completed by the family (see Section 5-II.D. of this action plan) but the FSS family is receiving welfare assistance at the time of expiration of the term of the CoP, including any contract extension [24 CFR 984.305(f)(1)].

The use of forfeited escrow accounts is described in detail in Section 3-I.F. of this FSS Action Plan.

Treatment of Forfeited FSS Account Funds

FSS Escrow Account funds forfeited by the FSS family must be used by the WVHA for the benefit of FSS participants that are in the program. These funds may only be used for support for FSS participants in good standing. These supports include transportation, childcare, training,

testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP; or training for FSS Program Coordinator(s). Forfeited FSS Escrow Accounts may not be used for salary and fringe benefits of FSS Program Coordinators, general administrative costs of the FSS Program, Housing Assistance Payment (HAP) expenses, or Public Housing operating funds.

PART II: ESCROW FUND ACCOUNTING AND REPORTING

6-II.A. OVERVIEW

Regulations set forth specific requirements involving the accounting and reporting for the FSS Escrow Account. This part describes those requirements and the HA policy necessary for managing the account from the WVHA perspective.

6-II.B. ACCOUNTING FOR FSS ACCOUNT FUNDS

When establishing FSS Escrow Accounts, WVHA must deposit the FSS account funds of all families participating in the WVHA's FSS Program into a single depository account for each program. These funds are determined at each reexamination after the effective date of the contract and must be deposited each month to each family's subsidiary line item in the HA's escrow account. In addition, the funds held in this account must be invested in one or more of the HUD-approved investments [24 CFR 984.305].

Crediting the Escrow Account [24 CFR 984.305(a)(2)(i)]

The total of the combined FSS account funds will be supported in WVHA accounting records by a subsidiary ledger showing the balance applicable to each FSS family. During the term of the Contract of Participation, the PHA must credit the amount of the FSS credit (see Section 6-I.B.) to each family's FSS account every month.

Proration of Investment Income [24 CFR 984.305(a)(2)(ii)]

Because the FSS account funds are to be invested, the investment income for those funds in the FSS account will also need to be credited to each family's account subsidiary line item. By regulation, these funds are to be prorated and credited to each family's FSS account based on the balance in each family's FSS account at the end of the period for which the investment income is credited.

WVHA Policy

Every month the full amount of the investment income for funds in the HCV and/or PH FSS account will be prorated and credited to each family's subsidiary line item after the deduction of unpaid rent and other amounts due under the HCV and/or PH lease.

Reduction of Amounts Due by FSS Family [24 CFR 984.305(a)(2)(iii)]

If the FSS family has not paid the family contribution towards rent, or other amounts, if any, due under the PH or HCV lease, the balance in the family's FSS account shall be reduced by that amount (as reported by the owner to the HA in the HCV Program) at the time of final disbursement of FSS escrow funds. If the FSS family has underreported income after the baseline annual income is set, the amount credited to the FSS account will be based on the income amounts originally reported by the FSS family.

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

6-II.C. REPORTING ON THE FSS ACCOUNT

WVHA must make a report, at least once annually, to each FSS family on the status of the family's FSS Escrow Account.

At a minimum, the report must include [24 CFR 984.305(a)(3)]:

- The balance at the beginning of the reporting period
- The amount of the family's rent payment that was credited to the FSS account, during the reporting period
- Any deductions made from the account for amounts due the PHA before interest is distributed
- The amount of interest earned on the account during the year
- The total in the account at the end of the reporting period

WVHA Policy

The WVHA will provide FSS participants a monthly statement on the status of their FSS Escrow Account.

Chapter 7

PORTABILITY IN HOUSING CHOICE VOUCHER FSS PROGRAMS

INTRODUCTION

HAs that operate an HCV FSS Program must be familiar with the rules and regulations regarding portability under the HCV Program. As with the case of portability in the HCV Program, the FSS family may move outside WVHA's jurisdiction under portability procedures after the first 12 months of the FSS Contract of Participation (CoP) [24 CFR 984.306].

If an FSS family chooses to exercise portability, certain special requirements regarding the FSS Program would apply. This chapter describes the obligations of the initial HA, the receiving HA, and the FSS family under portability, in addition to any special stipulations regarding portability in the FSS context.

This chapter contains two parts:

Part I: Portability in the FSS Program: This part provides a general overview of portability in the FSS Program, including the residency requirements for FSS portability and management of the CoP when a family moves into or from another HA's jurisdiction.

Part II: The Effects of Portability on FSS Regulations and Policy: This part describes the specific ways in which portability affects different aspects of the FSS Program, including the escrow account, program termination, loss of the FSS account, and termination of the HCV Program assistance.

PART I: PORTABILITY IN THE FSS PROGRAM

7-I.A. OVERVIEW

Portability is a statutory feature of the HCV Program—it is included in the law. As such, HAs operating an HCV Program need to understand the effects that portability will have on HCV FSS families and program operation. This part provides a general overview of portability in the FSS Program, including the residency requirements for FSS portability and management of the CoP when a family moves into or from another HA's jurisdiction.

7-I.B. DEFINITIONS

The following definitions will be used regarding portability and the FSS Program [24 CFR 982.4, 24 CFR 984.306].

- *Initial HA* means both:
 1. A HA that originally selected a family that later decides to move out of the jurisdiction of the selecting HA; and
 2. A HA that absorbed a family that later decides to move out of the jurisdiction of the absorbing HA.
- *Receiving HA* means a HA that receives a family selected for participation in the tenant-based program of another HA. The receiving HA either absorbs the family into its program,

including issuing a voucher and providing rental assistance to the family or bills the initial HA for the family's housing assistance payments and the fees for administering the family's voucher.

- *Relocating FSS Family* refers to an FSS family that moves from the jurisdiction of a HA at least 12 months after signing its CoP.

7-I.C. RESIDENCY REQUIREMENTS

Families participating in an HCV FSS Program are required to lease an assisted unit within the jurisdiction of the HA that selected the family for the FSS Program for a minimum period of 12 months after the effective date of the contract. However, the initial HA may approve a family's request to move outside its jurisdiction under portability during this period if the move is following the regulations at 24 CFR 982.353 [24 CFR 984.306(a)(1)].

WVHA Policy

The WVHA will approve a family's request to move outside its jurisdiction under portability during the first 12 months after the effective date of the CoP if the move is following the regulations for such moves at 24 CFR 982.353.

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

7-I.D. PORTABILITY REQUIREMENTS FOR FSS PARTICIPANTS

Receiving HA Administers an FSS Program [24 CFR 984.306(b)]

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

WVHA Policy

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

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

WVHA Policy

The WVHA will discuss the options that are available to the family where continued FSS participation is not possible. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving HA that can enroll the family in its FSS Program, termination with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

Receiving HA Does Not Administer an FSS Program [24 CFR 984.306(c)]

If the receiving HA does not administer an FSS Program, the FSS family may not continue participation in the FSS Program. The initial HA must discuss the options that may be available to the family. These may include but are not limited to, modification of the FSS contract, locating a receiving HA that administers an FSS Program, termination of the FSS contract with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

WVHA Policy

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

Single Contract of Participation

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

If the FSS family remains in the FSS Program of the initial HA, according to this section, the contract executed by the initial HA will remain as the contract in place.

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

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

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

7-I.E. NEW FSS ENROLLMENT INTO RECEIVING PHA'S FSS PROGRAM

Administering and Billing of the Voucher

If the receiving HA bills the initial HA, the receiving HA may enroll a family that was not an FSS participant at the initial HA into its FSS Program; but only if, the initial HA manages an FSS program and agrees to such enrollment. If the receiving HA bills the initial HA, but the initial HA does not manage an FSS program, the family may not enroll in the receiving HA's FSS program.

WVHA Policy

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

Absorption of the Voucher

If the receiving HA absorbs the family into its HCV Program, the receiving HA may enroll a family that was not an FSS participant at the initial HA into its FSS program.

PART II: REPORTING

7-II.A. OVERVIEW

Each HA that carries out an FSS Program shall submit to HUD, in the form prescribed by HUD, a report regarding its FSS Program.

7-II.B. CONTENTS OF THE FSS REPORT [24 CFR 984.401]

The report submitted to HUD must include a description of the activities carried out in the FSS Program; a description of the effectiveness of the program in assisting families to achieve economic independence and self-sufficiency, including the number of families enrolled and graduated and the number of established escrow accounts and positive escrow balances; a description of the effectiveness of the program in coordinating resources of communities to assist families to achieve economic independence and self-sufficiency; and any recommendations by the HA or the appropriate local Program Coordinating Committee (PCC) for legislative or administrative action that would improve the FSS Program and ensure the effectiveness of the program.

7-II.C. FAMILY SELF-SUFFICIENCY GRANT PROGRAM REVIEW PHA SELF-ASSESSMENT

HUD provides a detailed checklist for HAs to conduct their self-assessment of their FSS Program. The form is administered by the local field office and allows each HA to gather concrete and comprehensive data covering aspects of the program from FSS Action Plans and Composite Scores through FSS Program size, participants, and graduations to reductions in FSS grants and current Memoranda of Agreement with community partners. A detailed example of the FSS Self-Assessment is available on HUD's FSS Resource page, which can be located by searching "HUD FSS" on any browser.