



Housing Authority
of Bexar County

Family Self Sufficiency Program

Housing Choice Voucher Program

Housing Authority of Bexar County (HABC)

Family Self Sufficiency (FSS) Action Plan

Table of Contents

I.	Introduction.....	4
II.	Goals of the HABC Family Self Sufficiency Program.....	4
III.	Family Demographics.....	5
	A. Demographics – Housing Choice Voucher.....	5
	B. Estimate of Participating Families.....	5
	C. Eligible Families from other Self Sufficiency Programs	5
IV.	Outreach and Recruitment.....	5
V.	FSS Family Selection Procedures.....	6
	A. Reasonable Accommodations.....	6
	B. Non-discrimination.....	6
	C. General Application Process.....	6
	1. Application Steps.....	6
	D. Waiting List.....	7
	E. Selection Preference.....	7
	F. Motivational Screening Criteria.....	7
	G. Ineligible Applicants.....	7
	H. Enrollment of Previous Participants.....	8
VI.	HCV FSS Portability.....	8
	A. Port-Out to a receiving PHA with FSS Program	8
	B. Port-Out to a receiving PHA without FSS Program.....	8
	C. Incoming Portability.....	9
VII.	Method of Identification for Family Support Needs.....	9
	A. Personal Needs Assessment.....	9
VIII.	FSS Activities and Supportive Services.....	10
	A. Roles and Responsibilities of the FSS Coordinator.....	10
	B. Participant Engagement.....	11
IX.	Incentives to Encourage Participation.....	11
X.	Program Coordinating Committee (PCC).....	11
XI.	Contract of Participation (COP).....	12
	A. Family Responsibilities.....	12
	B. HABC Responsibilities.....	12
XII.	Contents of the Contract of Participation.....	13
	A. Individual Training and Services Plan.....	13
	1. ITSP Requires Goal – Employment Requirement.....	13
	2. ITSP Required Goal – Free of Welfare Assistance.....	14

XIII.	Consequences of Noncompliance with the Contract.....	14
XIV.	Contract Term, Extension, Modification, Termination and Completion.....	14
	A. Contract Term.....	14
	B. Contract Extension.....	15
	C. Contract Modification.....	16
	D. Contract Termination.....	16
	E. Contract Completion.....	17
XV.	Grievance Procedures.....	17
XVI.	Escrow.....	17
	A. Final Escrow Disbursement.....	18
	B. Interim Escrow Disbursement.....	18
	C. Forfeiture of FSS Escrow Account.....	19
XVII.	Assurance of Non Interference.....	20
XVIII.	Timetable for Implementation.....	20
XIX.	Certification of Coordination.....	20

I. INTRODUCTION

The Housing Authority of Bexar County (HABC) is establishing a Family Self Sufficiency (FSS) Program to support its philosophy that the key to financial self-sufficiency for low-income families is identifying and removing barriers that are presently keeping the family dependent on public assistance system(s). While recognizing that personal motivation and dedication are the primary requirements for an individual to achieve financial independence, HABC believes that the FSS Program can serve as an important tool in the process. The following Action Plan outlines how this program will be implemented.

All aspects of program implementation will be in compliance with 24 CFR Subtitle B. Any part of the FSS Program affecting the family's participation in the Section 8 Housing Choice Voucher Program or Public Housing will be in compliance with the appropriate federal regulations as well as Housing Authority of Bexar County's Administrative Plan, Policies and Procedures.

II. GOALS OF THE HOUSING AUTHORITY OF BEXAR COUNTY FAMILY SELF SUFFICIENCY PROGRAM

The goal of the Housing Authority of Bexar County's (HABC) in operating a FSS program is to assist families in becoming economically self-sufficient by coordinating the needs and goals of participants, matching participant families with existing community resources.

The purpose of the Family Self Sufficiency FSS program is to promote a coordination of public and private resources to support Housing Choice Voucher residents' efforts to achieve economic self-sufficiency leading to economic security.

The Family Self-Sufficiency Coordinator will provide case management services, organize, manage, and monitor program participants to provide support and encouragement as they work toward their goals.

The family's objective will be to achieve the following:

- Elevate itself from a status of dependency to that of self-reliance and growth towards the goal of self-sufficiency.
- Achieve a greater level of self-discipline, self-esteem, and self-motivation by accepting responsibility for decisions and actions.
- Demonstrate commitment and accountability to an Individual Training and Service Plan (ITSP), which is a customized service plan for the individual and family in which both goals and barriers are assessed.

III. FAMILY DEMOGRAPHICS

A. Demographics – Housing Choice Voucher Program (HCV)

OVERALL DEMOGRAPHICS	
Total Households	1,811
Total Residents	4,718
HOUSEHOLD SIZE	
Average Household Size	2.6
HEAD OF HOUSEHOLD GENDER	
Female	1,446
Male	365
HEAD OF HOUSEHOLD RACE/ETHNICITY	
% African American	30%
% White	69%
% Other	0.4%
% Hispanic	58%
% Non-Hispanic	42%
DISABILITY STATUS	
Head of Household w/Disabilities (HUD)	894
RESIDENT AGE	
Working Age (18-65)	1,551
HOUSEHOLD INCOME	
Average Annual Income	\$14,304

B. Estimate of Participating Families

HABC maintains an FSS program that is available to up to 1,811 eligible families who are currently receiving housing assistance through the Housing Choice Voucher Program. HABC intends to serve as many participants as it can accommodate based on available and anticipated federal, tribal, state, local, and private resources.

C. Eligible Families from other Self Sufficiency Programs

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

IV. OUTREACH AND RECRUITMENT

HABC will conduct ongoing outreach to HCV households to inform them of availability in the FSS program through the following outreach methods:

- HABC's primary website and social media sites.
- Brochures and flyers describing the FSS program will be included with HCV

Program and made available at new admissions and recertification appointments.

- The FSS Coordinator may attend Housing Choice Voucher (Section 8) briefings to describe the FSS program and encourage participation.
- Information brochures will be given on the Family Self Sufficiency program at the moment of the voucher distribution to HCV, Mainstream and VASH participants.

V. FSS FAMILY SELECTION PROCEDURES

A. Reasonable Accommodations

HABC will make reasonable accommodations to those persons with disabilities who require such accommodations as long as suitable employment within abilities can be met.

B. Non-discrimination

HABC's selection for participation is made without regard to race, color, sex, religion, disability, familial status, sexual identity, or national origin.

C. General Application Process

FSS program orientation will be given to each potential participant, and the FSS program will be explained in detail. An application will be completed by all prospective FSS participants and submitted to HABC. An FSS Coordinator will conduct a needs assessment and interview.

1. Application Steps

- The prospective FSS applicant completes the interest form in writing, or the FSS Coordinator will complete an interest form for the individual who calls and expresses an interest in the FSS Program.
- HABC will invite eligible HCV participants to attend an FSS enrollment appointment. At the appointment, the family will receive the requirements and benefits of participating in the FSS program. Prospective applicants that cannot attend an enrollment appointment will be accommodated and may opt to receive an application along with marketing materials describing the FSS program by mail or email.
- The prospective FSS applicant completes the FSS Personal Needs Assessment. The needs assessment helps to outline barriers the applicant may be facing.
- The FSS program applicant will complete an enrollment appointment in person or in a virtual setting if needed. At this appointment, the FSS coordinator will help the participant develop the Individual Training and Services Plan goals and program expectations prior to signing.
- The potential FSS program participant will complete a contract signing appointment that includes completing the Contract of Participation and Individual Training and Services Plan (ITSP) program goals. If the participant cannot attend the contract signing meeting, the FSS Coordinator will mail the Contract of Participation and ITSP

to be reviewed and signed.

D. Waiting List

Recognizing that the level of interest in FSS participation may occasionally exceed the capacity of HABC, a waiting list will be established. Placement on the waiting list will be chronological according to the date stamp on the full application except for individuals who are given preference due to being a current FSS Program participant. When openings in the program occur, the FSS Coordinator(s) will begin contacting FSS Applicants on the FSS waiting list to notify them of the opening and inquire about their continued interest in the FSS Program. Individuals will be removed from the waiting list if they enroll in the program, decline the slot, or are non-responsive to multiple outreach attempts. HABC will not maintain an exact limit on the number of slots available on the FSS waitlist.

E. Selection Preference

HABC will give preference (not to exceed 50% of the Housing Choice Voucher slots) to incoming portable families with an active FSS Contract of Participation if adequate resources are available and the participant is in compliance with the ITSP goals established at the initial Housing Authority.

F. Motivational Screening Criteria

The FSS service provider may screen families for interest and motivation to participate in the FSS program by using permissible motivation selection factors per HUD regulations, including requiring attendance at FSS orientation sessions or pre-selection interviews, and assigning certain tasks indicating the family's willingness to undertake the obligations that may be imposed by the FSS Contract of Participation (COP). Any task assigned will be readily accomplishable by the prospective participant education level or disabilities and reasonable accommodations will be made for individuals with mobility, manual, sensory speech impairments, mental or developmental disabilities [24 CFR 984.203(c)(2)].

The activities that HABC shall utilize for FSS Motivational Screening purposes, may include, but are not limited to the following:

- Applicant completion of FSS Program orientation, either individually or group setting.
- If unemployed at time of application, visit the Texas Department of Employment or "Texas Workforce Center™" for a career assessment and services orientation.
- Applicants not having a high school diploma/GED can be required to complete a GED pre-test assessment.

G. Ineligible Applicants

HABC may deny participation to families who wish to join the FSS program if the applicant:

- Has successfully met the terms of a previous FSS contract with HABC or another

Housing Authority and officially graduated from the FSS program with an escrow savings account.

- Owes money to the HABC or any other Housing Authority.

H. Enrollment of Previous Participants

There are instances in which FSS participants need to exit the program due to unanticipated circumstances or hardships that are beyond control of the participant and or may inhibit progress toward ITSP goals. Previous participants who exit from the program voluntary or unsuccessfully (i.e., due to non-completion of ITSP goals), may be approved for re-enrollment into the FSS program after 12 months of being exited from the program. Re-enrollment is limited to one-time per participant.

Previous participants are not eligible to re-enroll in FSS if:

- The FSS participant successfully completed an FSS Contract of Participation.
- The FSS participant is terminated for non-compliance pertaining to the HCV program, or commits any fraud, bribery, or any other corrupt or criminal act in connection with any HABC housing programs.

VI. HCV FSS PORTABILITY

A. Port-Out to a receiving PHA with FSS Program

- A Housing Choice Voucher FSS participant is eligible to exercise portability per the policies of the HABC's Housing Choice Voucher Administrative Plan.
- A receiving PHA is not required to accept an HABC relocating FSS family into its FSS Program.
- If the participant is accepted and absorbed into the receiving PHA's FSS program, any escrow account will be transferred to the receiving housing agency.
- The PHA will enter into a new Contract of Participation (COP) with the FSS family for the term remaining on the contract with the initial PHA. FSS participants who port out do not get any additional time to complete their ITSP goals; the COP expiration date remains the same as for the contract signed with the initial PHA. The baseline information (i.e., the initial annual income, family rent, and earned income information) of the original COP also transfers to the new contract.

B. Port-Out to a receiving PHA without FSS Program

- A relocating FSS family may continue in HABC's FSS program (if not absorbed by the receiving PHA) if the family demonstrates they can fulfill their FSS responsibilities under their existing FSS contract. This must be demonstrated to the satisfaction of HABC.
- HABC will remain responsible for monitoring the family's progress. HABC will send the 50058 FSS addendum information to the receiving PHA in order for the receiving PHA to submit the 50058 to HUD.

- If the participant moves out of the HABC jurisdiction and is not absorbed by the new Housing Agency, the escrow account will be maintained by the HABC.

C. Incoming Portability

- An FSS participant moving into the HABC jurisdiction will be accepted into HABC's FSS program only if the port-in is absorbed by HABC HCV program and if adequate resources are available and the participant is in compliance with the ITSP goals established at the initial Housing Authority.
- The initial PHA must provide HABC with the COP and ITSP with the portability packet.
- Initial PHA needs to provide the escrow balance within 90 days of the effective date of the new lease.
- Individuals who exercise portability into HABC jurisdiction and are current eligible FSS Program participants may be given preference as outlined in the Selection Process section of this FSS Action Plan document. A new FSS COP will be executed for the term remaining on the original contract. The new contract start date will be the effective date of the new lease in the HABC's jurisdiction. The end date of the contract must be the same expiration date of the contract between the initial Housing Authority and the participant. HABC must use the amounts listed for annual income, earned income, and family rent (TTP) from the original COP on the new contract with HABC and the family.
- If a waiting list has been established the FSS participant family will be placed at the top of the waiting list as outlined in the Selection Process section of this FSS Action Plan document.

VII. METHOD OF IDENTIFICATION FOR FAMILY SUPPORT NEEDS

HABC's FSS Coordinator will assess the needs of each FSS family beginning at intake and on an ongoing basis, using case-by-case evaluation and self-reporting, in addition to any tools pursuant to delivering effective case management including, but not limited to a Personal Needs Assessment Form.

A. Personal Needs Assessment

- A personal needs assessment will be conducted initially with participants selected for the FSS Program to identify and evaluate the participant's needs, strengths, training, or employment readiness, and the appropriateness of employment goals so that an Individual Training and Services Plan (ITSP) can be developed. The Personal Needs Assessment will include:
 - Identifying short term immediate barriers and most pressing needs.
 - Identifying other needs to determine long-term solutions.
 - Identifying the participant's employability.
 - Identifying skills, interests and values regarding school, training, and job opportunities.
 - Identifying possible obstacles such as, but not limited to factors leading

to past failures and present circumstances adversely affecting the participant.

- The needs assessment covers areas such as employment, education, childcare, and health.

VIII. FSS ACTIVITIES AND SUPPORTIVE SERVICES

HABC'S FSS activities and support services are coordinated and administered by a contracted FSS Coordinator. The FSS Coordinator delivers both direct service coordination and referrals to local and private resources.

The quantity and quality of supportive services received will depend on the availability of resources available in the community. To support FSS participants in achieving their goals, the HABC FSS Coordinators will coordinate the following services or will provide referrals to partnering agencies:

- Childcare
- Parenting Skills
- Education
- Homeownership Counseling
- Transportation
- Resume/job interview skills
- Job search assistance
- Job training/placement
- Job retention training
- Household management skills
- Financial/money management

A. Role and Responsibilities of the Family Self Sufficiency Coordinator

To assist the FSS families in completing the goals outlined in the FSS Contract of Participation and ITSP, HABC FSS coordinators will provide ongoing support, follow-up, tracking counseling, referrals, and other support services to the FSS families.

- The FSS Coordinator will market the FSS program and provide outreach and recruitment of potential participants.
- The FSS Coordinator will complete a needs assessment with each participant upon enrollment.
- The FSS Coordinator will assist participants with the development, assessment, and reassessment of an Individual Training and Services Plan. The FSS Coordinator(s) will collaborate with other agencies actively involved with participants to ensure continuity of services.
- A primary role of the FSS Coordinator is to assist families in achieving productive employment and self-sufficiency through the provision of referrals to supportive services available in the community.
- The FSS Coordinator will research appropriate public and social service agencies, organizations, and private businesses to determine the most appropriate agencies to provide services to FSS participants.
- The FSS Coordinator will join community collaborations to network services for the FSS participants.
- The FSS Coordinator is responsible for calculating, tracking, and notifying FSS

participants of escrow funds. The FSS Coordinator is responsible for releasing escrow accounts consistent with federal guidelines upon successful completion of the FSS Program by FSS participants.

- The FSS Coordinator will work with the Program Coordinating Committee (PCC) to leverage services for HABC FSS participants.
- The FSS Coordinator will be responsible for providing FSS program data for reporting and program evaluation of the project as required by HUD.

B. Participant Engagement

Regular outreach will be scheduled with participants to review or adjust the ITSP, document progress toward goals, and provide needed services or referrals. Frequent engagement may be necessary depending on the participant's needs and the progress made toward FSS goals. FSS Coordinators attempt to engage each participant at least once each quarter of the calendar year.

IX. INCENTIVES TO ENCOURAGE PARTICIPATION

The HABC FSS program offers incentives to encourage participation and enhance the participant's ability to achieve self-sufficiency. HABC will establish an FSS Escrow Account for each eligible participating family per HUD guidelines as a financial incentive for program participation. Additional incentives include, but are not limited to, enhanced opportunities for education, training, and employment through coordination with a network of local service providers. FSS participants have access to referrals for financial counseling, credit repair, homeownership workshops, and resources about the home buying process.

Through case management, FSS participants will have the opportunity to receive individualized assistance and encouragement from HABC FSS Coordinators that encourage participation and help families achieve self-sufficiency.

FSS participants also have many personal incentives for involvement, including structured goal planning, greater opportunity to increase their standard of living, an enhanced support system, increased self-esteem, etc.

X. PROGRAM COORDINATING COMMITTEE (PCC)

A Program Coordinating Committee established in accordance with the FSS regulations assist in securing commitments of public and private resources for the operation of the FSS program. The PCC will be required to meet semi-annually and may conduct business on an as needed basis via email or telephone conferences.

The PCC is composed of representatives of the HCV program and a PHA representative. For HABC the PHA representative will be an FSS Coordinator. HABC PCC may also include partners of the various entities that serve as a referral network for our residents. This collaboration is expected to provide feedback to the FSS team on methods to enhance the FSS program.

XI. CONTRACT OF PARTICIPATION (COP)

Upon enrollment, as required by HUD, all applicants will be required to sign form HUD-52650, Family Self Sufficiency (FSS) Program Contract of Participation (COP). The purpose of the COP is to state the rights and responsibilities of the family and HABC, the resources and supportive services to be provided to the family, and the activities to be completed by the family as established on the Individual Training and Services Plan (ITSP). The ITSP is meant to establish goals for an FSS family to meet along the family's way to completing the final goals listed in 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 HABC.

The COP will be for an initial 5 – year term and will include an Individual Training and Services Plan. The COP lists the family's current annual income, the amount of earned income included in the annual income and the 30% of the family's monthly adjusted income (HCV) when the family begins FSS participation, COP effective and expiration dates.

A. Family Responsibilities

1. Compliance with the terms of The Housing Lease Agreement
 - One of the obligations of the FSS family according to the contract of participation is to comply with the terms and conditions of the housing choice voucher program assisted lease [24 CFR 984.303(b)(3)].
 - 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)].
2. Employment Obligation [24 CFR 984.303(b)(4)]
 - Seek and maintain suitable employment during the term of the contract and any extension.
3. Complete activities specified in the ITSP [24 CFR 984.303(b)(2)]
4. If receiving welfare assistance, become independent of welfare assistance at the time of graduation from FSS according to HUD [24 CFR 984.303(b)(2)].

B. HABC Responsibilities

1. Attempt to obtain commitments from public and private sources for supportive services for families
2. Establish an FSS escrow account for the family as the FSS participants starts accruing and give the family a report on the amount in the FSS escrow account at least once a year.
3. Determine which if any, interim goals must be completed before any FSS escrow

- funds may be paid to the family.
4. Determine if the family has completed the Contract of Participation.
 5. Complete a disbursement for the amount in the FSS family escrow account, if the family has completed the contract and HABC has written certification that no member of the family is receiving welfare assistance.

XII. CONTENTS OF THE CONTRACT OF PARTICIPATION

A. Individual Training and Services Plan (ITSP)

In conjunction with the COP, the participant completes an ITSP that establishes the interim and final goals of the individual's participation in the program. The ITSP is a component of the COP and thus a participant obligation.

The ITSP sets forth both the resources and supportive services to be provided to each participating family member, the activities to be completed by that family member, and the agreed upon completion dates for the services and activities. Participants selected for the FSS Program will develop an ITSP with the FSS Program Coordinator.

The ITSP shall be reviewed by the participant and the FSS Coordinator annually, at a minimum, to ensure ongoing adherence and appropriateness. Modifications will be made to the ITSP as goals change or need to be added to promote self-sufficiency. A goal may be discontinued by a participant in consultation with the FSS Coordinator, the change must occur at least six months prior to program completion. Any changes to the Final Goals will be included as a written revision that will include the item to be changed, the date of the change, and the signatures of the participant, the FSS Coordinator, and the HCV Programs Manager or Director of Operations & Governments Programs.

Monitoring progress of individual participants will be the responsibility of the FSS Coordinator. FSS Coordinator will meet face-to-face with participants at least annually to ensure the FSS participant is progressing through the ITSP. The FSS Coordinator will maintain quarterly contact by phone, email, or written communication when face-to-face contact is not required.

1. ITSP Required Goal - Employment Requirement [24 CFR 984.303(b)(4)]

A final goal must include seek and maintaining suitable employment specific to the individual's skills, education, and job training and the available job opportunities.

- Seek employment:

The obligation to seek employment shall include activities to prepare for employment. This may entail attending workforce development classes such as resume review, interview skills, etc. or conducting job search by sending out resume, attending job interviews and submitting employment application.

- Suitable employment:

Employment obtained and maintained by the FSS participant that will allow for independence from welfare assistance i.e., allows the family or individual to meet basic needs and lead to building financial security. Suitability will be determined on a case-by-case basis with consideration of individual circumstances and may include full time or part time that is reasonably expected to continue.

- Accommodations for Disabled Individuals:

A person with disabilities may request an accommodation to employment requirements. Request for accommodation must be in writing and include documentation which supports the claim of the disability by a licensed doctor or medical care provider at least 90 days prior to program completion. The request must include acceptable and safe number of hours the disabled participant may be required to work. All requests will be considered on a case-by-case basis. Final determination will be made by the HCV Programs Manager or Director of Operations & Governments Programs.

2. ITSP Required Goal - Free of Welfare Assistance [24 CFR 984.303(b)(2)]

For each participant who is a recipient of welfare assistance, an interim goal must be established that the family will become independent from welfare assistance, as defined by HUD regulations for FSS, and remain independent from welfare assistance before the expiration of the term of the COP, including any extension thereof.

XIII. Consequences of Noncompliance with the Contract

If a participating FSS family fails to meet, without “good cause” their obligations as outlined in the COP, including compliance with the HCV lease, the Housing Authority of Bexar County may:

1. Withhold supportive services
2. Terminate the family’s participation in the FSS program.

HABC will not terminate Housing Choice Voucher program assistance due to FSS noncompliance. Termination of Housing Choice Voucher Program assistance will result in automatic termination of the FSS Program Contract of Participation.

XIV. CONTRACT TERM, EXTENSION, MODIFICATION, TERMINATION AND COMPLETION

A. Contract Term

The contract of participation establishes that each FSS participant family is required to fulfill the obligations to which the family has committed itself under the FSS COP no

later than five years after the effective date of the contract.

B. Contract Extension

HABC may, extend the term of the Contract of Participation for a period not to exceed two years when good cause exists for granting the extension. The FSS family will need to submit a written request for an extension that will include a description of the need for the extension.

The request letter should include the following components:

1. An explanation of why the goals were not completed (description of the need for the extension)
2. What goals still need to be completed
3. The time frame in which the goals will be completed

Extensions will not be granted for loss of employment due to lack of performance on the part of the FSS participant. All requests for extension must be submitted in writing prior to expiration of the Contract of Participation.

During the extension period the family will continue to be eligible to receive deposits into the FSS Escrow Account. The FSS Family will be required to continue abiding by the Contract of Participation, Program Completion Agreement, and Individual Training Service Plan, as well as keep in regular contact with a FSS Coordinator during the extension. Contract extensions are approved and signed by the Sr FSS Coordinator or the HCV Programs Manager.

For purposes of the HABC FSS program, *good cause* may involve needing additional time to meet the employment requirement or complete other ITSP goals. It can also involve one or more of the following circumstances:

- Serious illness
- Involuntary loss of employment
- Active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of extension to include, but not limited to:
 - Completion of a Collage Degree during which the participant is unemployed or under-employed
 - Credit repair towards being homeownership ready.
- Family circumstances
 - Death in the family
 - Medical emergency
 - Mandatory court appearances
 - Loss of head of household through death, incarceration, or removal from lease
- Community circumstances
 - Significant reduction in workforce due to global economic hardship or natural disasters.
 - Provider providing inferior service.

- Provider unable/unwilling to provide service.
- Provider non-compliance with regulation.

C. Contract Modification

The COP may be modified by mutual agreement between the HABC and the FSS family:

- 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 designated head of the FSS family ceases to reside with other family members in the assisted unit and the remaining family members, after consultation with the Sr. FSS Coordinator and the HCV Programs Manager to designate another family member to be the head of household and receive escrow funds. In this case, the attachment to the contract must contain:
 - The name of the new designated head of the family
 - The signatures of the new head of the family and HABC representative, and the date signed.

When a relocating family is entering the FSS program of a receiving PHA (portability) and the start date of the COP must be changed to reflect the date the new COP is signed with the receiving PHA, the end date of the contract must be the same expiration date of the initial contract.

- Modifications to the Individual Training and Services Plan may be made no later than 30 days prior to the expiration date of the FSS Contract of Participation, to include any extension approved.

D. Contract Termination

The FSS Contract of Participation may be terminated before the expiration of the contract term, to include any extension, for any of the following reasons:

- Mutual Consent of the parties
- Failure of the FSS family to meet its obligations under the COP without good cause.
- Failure to comply with the contract requirements because the family has moved outside the jurisdiction of the PHA without continued assistance under portability as established by HUD, HABC FSS Action Plan and HABC Administrative Plan.
- The family's withdrawal from the FSS program
- Such other act as is deemed inconsistent with the purpose of the FSS program
- Operation of law

The COP is automatically terminated if the family's housing assistance is terminated in accordance with HUD requirements.

FSS participants who are terminated from the FSS program must wait 12 months before they can reapply for the FSS program. Re-enrollment will be considered on a case-by-case basis.

E. Contract Completion

In order to successfully complete the FSS COP and receive any money in the FSS Escrow Account, participants must meet the following criteria:

1. The FSS participant has obtained and maintained suitable employment for the term and conditions established in the ITSP.
2. All members of the household have been independent of welfare. Welfare is defined as income assistance from Federal or State welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs. It does not include food stamps, Social Security payments, Medicaid, or similar benefits.
3. All activities listed on the ITSP must be completed within the designated timeframe.
4. The household is in full compliance with the lease, including no monies owed for unpaid rent or damages to HABC or Section 8 HCV landlord.

A participant may only graduate one time from the HCV FSS program.

XV. GRIEVANCE PROCEDURES

HABC FSS family may file a grievance for any decision involving termination from the FSS program or the family feels they have been subjected to another adverse action related to FSS.

Adverse actions taken within the FSS program include:

- Denial of admission into the FSS program
- Denial of a request for extension to the FSS COP
- Denial of request to change the ITSP
- Escrow funds forfeited
- Denial of request for interim disbursement of the escrow account
- Denial of a request to complete the COP
- Denial of request to change the Head of the Household
- Denial of request for final distribution of the escrow account or any portion thereof.
- Withholding of Supportive Services
- Termination of the FSS COP

The grievance procedures for the FSS program will be the same as the grievance procedures adopted for the Housing Choice Voucher Program in the HCV Administrative Plan, Chapter 21.

No appeal will be granted for voluntary withdrawal.

XVI. ESCROW

The establishment of an escrow account is offered as a financial incentive to families for participation in the FSS program. FSS participant, if eligible, accumulate money in an

escrow account when their earned income increases. Generally, under this incentive, each time eligible family's earned income increases, this will typically result in a rent increase. A portion of the increase rent amount is deposited into an escrow account, in accordance with HUD regulations as defined in 24CFR 984.305.

The funds from this escrow account become available to FSS families upon successful completion of their COP.

When the family is selected for the FSS Program and executes a COP, the FSS Coordinator(s) will enter the baseline income data into the contract. There will not be an escrow calculation until the family has a qualifying increase in earned income after the effective date of the COP.

HABC escrows the amount of the FSS credit due the family on a monthly basis. If HABC finds that a family did not report income that required reporting, HABC will not credit the family's escrow account retroactively with any portion of the unreported income and re-calculation may be necessary following HUD regulation [24 CFR 984.305(a)(2)].

HABC will annually provide an escrow report to each FSS family on the status of the family's FSS account. The report will include:

- 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 deduction made from the account at the time of final disbursement of FSS escrow funds for amounts due to HABC.
- The amount of interest earned during the year.
- The total in the account at the end of the reporting period.

A. Final Escrow Disbursement

When the contract has been completed according to regulation, the amount in an FSS account in excess of any amount the FSS family owes to HABC will be paid to the head of the FSS family. However, in order to receive the disbursement, the head of the FSS family must submit a certification (as defined in CFR 984.103) to HABC 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. The FSS Coordinator will review final disbursement requests and when determined appropriate shall recommend disbursement to the Executive Director or the Director of Operations. The Executive Director or designee must grant final approval prior to the disbursement.

B. Interim Escrow Disbursement

HUD requires that Interim Disbursement be consistent with the COP, such as education, employment or building an asset, at the sole discretion of HABC. Participants in good standing with the FSS program and HABC will be allowed to request money from their escrow accounts prior to the completion of their contract.

Request for Interim disbursement must be in writing. The family must have completed at least one goal set forth in the ITSP and provide documentation of completion of these interim goal as determined by the FSS Coordinator. The early withdrawal of funds must be used for complete the goals articulated in the ITSP.

HABC standard practice is that an interim disbursement can only be granted one time during a participant's time in the FSS Program, in advance of graduation, not to exceed the 40% of the total amount accrued at the moment of the request. Exceptions to this "one time only" policy will be considered if the request is related to an educational goal or the building of an asset (like homeownership). Final discretion rests with HABC. The granting of any additional Interim Disbursement requests will also depend upon how the previous opportunity was handled. The family may be required to pay a portion of the overall cost of the item.

All FSS families with an escrow balance are eligible to request an interim withdrawal once the family has been enrolled in the program for at least 12 months. Exception to this "12 months" policy will be considered on a case-by-case basis and final decision will rest with HABC.

The head of household must submit a budget in addition to a written request for an interim withdrawal. The request must include:

- The amount of money requested
- The amount of money the family will be investing
- How the funds will be use
- How this will facilitate their movement toward self-sufficiency
- An assessment of their progress on their self-sufficiency goals
- Alternative funding sources they have tried
- Documentation of expenses.

The FSS Coordinator will review interim disbursement requests and when determined appropriate shall recommend disbursement to the Executive Director or Director of Operations. The Executive Director or designee must grant final approval prior to the disbursement. Upon determination from the HABC that the FSS participant meets all requirements and conditions, the interim escrow disbursement processing will occur. Interim disbursement will be made pay to the agency or service provider.

C. Forfeiture of FSS Escrow Account

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

- The COP is terminated as provided in [24 CFR 984.303(h)]
- The COP is completed by the family as provided in [24 CFR 984.303(g)], but the FSS family is receiving welfare assistance at the time of expiration of the term of the contract of participation, including any contract extension.

XVII. ASSURANCE OF NON INTERFERENCE

Participation in the FSS program is strictly voluntary. Housing Choice Voucher program participants will be notified in all presentations related to FSS program that should they decide not to participate in the FSS program, it will not affect their HCV housing assistance.

XVIII. TIMETABLE FOR PROGRAM IMPLEMENTATION

The Housing Authority of Bexar County began its FSS program in 1994 and has continuously operated the HCV FSS program since approved funding by HUD.

XIX. CERTIFICATION OF COORDINATION

The HABC FSS program has been developed to avoid duplication of services and activities. The FSS Coordinators refer participants to agencies to ensure eligibility for services and to ensure that duplication of services does not occur. HABC will continue to coordinate with relevant agencies and organizations throughout the implementation of the FSS program in order to promote the maximum benefit to participants while avoiding any duplication of service