



**FAMILY SELF SUFFICIENCY  
ACTION PLAN**



**HOUSING AUTHORITY OF BEXAR COUNTY**

## Table of Contents

I.	Introduction .....	2
II.	Program Objectives .....	2
III.	Program Size and Characteristics .....	3
IV.	Family Selection Procedures .....	4
V.	Outreach .....	7
VI.	FSS Escrow Account and Other Incentives for Participants .....	8
VII.	Family Activities and Supportive Services .....	10
VIII.	Method of Identifying Family Support Needs and Delivering Appropriate Support Services .....	11
IX.	Contract of Participation .....	11
X.	Program Termination, Withholding of Services, and Available Grievance Procedures .....	14
XI.	Assurance of Non-Interference .....	15
XII.	Timetable .....	16
XIII.	Reasonable Accommodations, Effective Communications, and Limited English Proficiency .....	16
XIV.	Coordination of Services .....	16
XV.	FSS Portability .....	17
XVI.	Other Policies .....	18
XVII.	Definitions .....	18

## **I. Introduction**

The Housing Authority of Bexar County (HABC) Family Self Sufficiency (FSS) Program is to support the 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 in a manner consistent with HUD requirements and local objectives. The policies in this FSS Action plan have been designed to ensure compliance with all approved applications for HUD FSS funding.

## **II. Program Objectives**

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

The purpose of the Family Self Sufficiency FSS program is to promote the 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. Program Size and Characteristics

#### a. Family Demographics

The HABC FSS program will serve the following: Housing Choice Vouchers (HCV): Tenant-Based Vouchers, and Housing Choice Vouchers (HCV)- Other special purpose vouchers (FYI, VASH, EHV, MAINSTREAM).

OVERALL DEMOGRAPHICS	
Total Households	2,184
Total Residents	5,774
HOUSEHOLD SIZE	
Average Household Size	3
HEAD OF HOUSEHOLD GENDER	
Female	1,762
Male	422
HEAD OF HOUSEHOLD RACE/ETHNICITY	
% African American	31%
% White	67%
% Hispanic	85%
% Non-Hispanic	15%
% Other	2%
DISABILITY STATUS	
Head of Household w/Disabilities (HUD)	959
RESIDENT AGE	
Working Age (18-65)	1,877
HOUSEHOLD INCOME	
Average Annual Income	\$14,688

#### b. Supportive Services Needs of Families Expected to Participate in FSS

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:

- Training in basic skills and executive function (including household management)

- Job placement assistance
- Job training/search assistance
- GED preparation
- Higher Education Guidance and Support
- English as a Second Language
- Assistance accessing childcare
- Transportation Assistance
- Financial Empowerment
- Access to Homeownership readiness
- Access to counseling or treatment for personal welfare, substance abuse and mental health

This list of supportive services needs is based on the experience with past FSS program participants and input from the PCC partners.

#### **c. Estimate of Participating Families**

HABC maintains an FSS program that is available to up to 2,184 potential 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.

Historically, HABC's FSS program has enrolled approximately 30 new families into the FSS program each year. Accordingly, HABC expects to be able to provide FSS Services to Approximately 250 families over a five-year period.

#### **d. Other Self Sufficiency Programs**

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

### **IV. Family Selection Procedures**

#### **a. 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.

### **b. Admission Preferences**

HABC will give preference (not to exceed 50% of the FSS 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. Incoming portable families will be reached by the HABC FSS Coordinator to assess interest into continue FSS Contract. Interested families porting in will be enrolled based on the date and time of application to the HABC FSS Program.

### **c. Screening for motivation**

HABC will screen families for motivation to participate in the FSS program by requiring that families who apply to enroll in the FSS program attend an initial orientation session. Each family will be given two opportunities to attend the orientation session and may request an accommodation if unable to attend a scheduled orientation session. Accommodations will be offered on a case-by-case basis, depending on the needs of the applicant. Accommodations may include an individually scheduled orientation session, provision of transportation to/from the orientation site or an alternative location, translation services, a virtual orientation session, or allowance and encouragement to bring children to the session, where possible.

### **d. Compliance with nondiscrimination policies**

It is the policy of HABC to comply with all Federal, State, and local nondiscrimination laws and regulations, including but not limited to the Fair Housing Act, the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the grounds of race, color, sex, religion, national or ethnic origin, family status, source of income, disability or perceived gender identity and sexual orientation. In addition, HABC's FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).

The FSS program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS coordinators will review the file with the supervisor to ensure that non-selection is not based on discriminatory factors before the final decision is made. Applicants will be notified in writing of the reason(s) they were not selected for participation and will have the opportunity to appeal the decision (see Hearing Procedures). At all times, HABC will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

#### **e. Re-enrollment of prior FSS participants**

There are instances in which FSS participants need to exit the program due to unanticipated circumstances or hardships that are beyond the control of the participant and or may inhibit progress toward ITSP goals. The following previous FSS families may be allowed to re-enroll in HABC's FSS Program:

- Previous participants who exit from the program voluntarily may be approved for re-enrollment into the FSS program after 12 months of being exited from the program.
- FSS program graduates without escrow disbursement may be approved for re-enrollment into the FSS program after 12 months of graduation.
- Family members who were not Heads of FSS Family previously.

The following conditions apply to re-enrollment:

- Re-enrollment is limited to one-time per participant.
- The participant cannot have a previous escrow disbursement.
- The participant cannot Owe money to any Housing Authority.

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

- The FSS participant successfully completed an FSS Contract of Participation with escrow disbursement.

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.

#### **f. Head of FSS Family**

The head of the FSS family is designated by the participating family. HABC may make itself available to consult with families on this decision, but it is the assisted household that chooses the head of FSS family that is most suitable for their individual household circumstances. The designation or any changes by the household to the Head of FSS Family must be submitted within 10 business days to the HABC on a form developed by HABC

#### **g. 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.

## **Application Steps**

1. 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.
2. 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.
3. The prospective FSS applicant completes the FSS Personal Needs Assessment. The needs assessment helps to outline barriers the applicant may be facing.
4. 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 participants develop the Individual Training and Services Plan goals and program expectations prior to signing.
5. 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, email, or fax the Contract of Participation and ITSP to be reviewed and signed.

## **V. Outreach**

HABC will conduct widespread outreach to HCV households to encourage enrollment in the FSS program through the following methods:

- HABC's primary website and social media sites.
- Brochures and flyers describing the FSS program will be included with HCV recertification letter and at new admissions appointments.
- Posting FSS program flyers at HABC lobby.
- The FSS Coordinator may attend Housing Choice Voucher (Section 8) briefings to describe the FSS program and encourage participation.
- Providing information about the FSS program to eligible families by email.

Outreach informational material about the FSS Program will include information about:

- Program overview
- Program benefits
- Available resources



- Participant responsibilities
- Program outcomes

Outreach efforts will be targeted equally to all families, using materials in both English and other commonly spoken languages to ensure that non-English and limited English-speaking families receive information and have the opportunity to participate in the FSS Program. In conducting outreach, HABC will account for the needs of the person with disabilities, including persons with impaired vision, hearing, or mobility, and provide effective communications to ensure that all eligible who wish to participate are able to do so.

## **VI. FSS Escrow Account and Other Incentives for Participants**

### **a. Additional Incentives**

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.

### **b. Interim Disbursements**

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 completing the goals articulated in the ITSP. Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment.

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 FSS family 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 used
- 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 first explore options for services and in-kind donations from partners, which must be exhausted before a request for an interim disbursement will be approved.

The FSS Coordinator will review interim disbursement requests and when determined appropriate shall recommend disbursement to the Executive Director or Director of Government Programs. 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 payable to the agency or service provider.

#### c. Use of forfeited escrow funds

FSS escrow account funds forfeited by the FSS family (if any) will be used to support FSS participants in good standing. Upon written request from a family, the FSS Coordinator and the Executive Director or Director of Government Programs will consider the available funds and make a determination.

Forfeited escrow funds may not be considered as a substitute for an interim escrow disbursement.

Forfeited FSS escrow funds may be deployed at any time during the term of a household's CoP and the use of forfeited escrow funds for eligible uses may be requested by the Head of the FSS Family.

Eligible uses of forfeited escrow funds 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. Requests will be considered on a case-by-case basis.
- Training for FSS Program Coordinator(s). Requests for funding must be approached by the FSS Coordinator.
- Other eligible activities as determined by the HUD.

Such funds may not be used for salary and fringe benefits of FSS Program Coordinators, general administrative costs of the FSS program, for housing assistance payments (HAP) expenses or public housing operating funds; or any other activity determined ineligible by HUD.

## **VII. Family 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.

To support FSS participants in achieving their goals, the HABC FSS Coordinators will coordinate services or will provide referrals to partnering agencies. The quantity and quality of supportive services received will depend on the availability of resources available in the community. Supportive services included, but not limited to:

- Training in basic skills and executive function (including household management)
- Job placement assistance
- Job training/search assistance
- GED preparation
- Higher Education Guidance and Support
- English as a Second Language
- Assistance accessing childcare
- Transportation Assistance
- Financial Empowerment
- Access to Homeownership readiness
- Access to counseling or treatment for personal welfare, substance abuse and mental health

## **VIII. Method of Identifying Family Support Needs and Delivering Appropriate Support Services**

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. Identifying Family Support Needs**

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.

### **b. Delivering Appropriate Support Services**

All families who participate in the FSS program will be assigned an FSS coordinator who will provide outreach, recruitment, and retention of FSS participants; goal-setting and case management/coaching of FSS participants, work with the community and service partners; and tracking program performance.

### **c. Transitional supportive service assistance**

No assistance or referrals will be provided by the FSS coordinator to families who have completed their CoP contracts.

## **IX. Contract of Participation**

### **a. Form and content of the contract**

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 Head of the FSS family does not need to be the HCV head of household. Any adult in the household (as designated by the family) can enter into an FSS contract and be the "Head of the FSS Household". They will be

responsible for contract completion and will receive the escrow disbursement. Head of household can be changed however the start/end dates and baseline of the CoP would not change. 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 each adult member of the FSS family who elects to participate in the program.

#### **b. Individual Training and Services Plan (ITSP) goals**

Each individual's ITSP will establish specific interim and final goals by which HABC, and the family will measure the family's progress towards fulfilling its obligations under the CoP. For any FSS family that is a recipient of welfare assistance at the outset of the CoP or that receives welfare assistance while in the FSS program, HABC will establish as a final goal that every member of the family become independent from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

#### **c. Determination of suitable employment**

As defined in the FSS regulations (24 CFR 984.303(4)(iii)), a determination of what constitutes "suitable employment" for each family member with a goal of seeking and maintaining it will be made by HABC, with the agreement of the affected participant, based on the skills, education, job training and receipt of other benefits of the family member and based on the available job opportunities within the community.

#### **d. Contract of Participation term and extensions**

The CoP will go into effect on the first day of the month following the execution of the CoP. The initial term of the CoP will run the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. Families may request up to two one-year extensions and are required to submit a written request that documents the need for the extension. HABC will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

1. Circumstances beyond the control of the FSS family, as determined by HABC, such as a serious illness or involuntary loss of employment.
2. Active pursuit of a current or additional goal that will result in the furtherance of self-sufficiency during the period of the extension (e.g., completion of a college degree during which the participant is unemployed or under-employed, credit repair towards being homeownership ready, etc.) as determined by HABC or
3. Any other circumstances that HABC determines warrant an extension, including:

- i. Family circumstances
  - Death in the family
  - Medical Emergency
  - Mandatory court appearances
  
- ii. Community circumstances
  - Significant reduction in the workforce due to global economic hardship or natural disasters.
  - Provider unable/unwilling to provide service.
  - Provider non-compliance with regulation.

**e. Completion of the contract**

The CoP is completed, and a family's participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members' ITSPs, on or before the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed. HABC will accept a combination of self-certification, third-party verification, and or support documents as proof of completion of the ITSP goals.

**f. 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 FSS head of family.
  
- 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 180 days prior to the expiration date of the FSS Contract of Participation, to include any extension approved.

**g. 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 terminate the family's participation in the FSS program.

**X. Program termination, Withholding of Services, and Available Grievance Procedures**

**a. Involuntary Termination**

HABC may involuntarily terminate a family from FSS under the following circumstances:

- If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan, and related documentation.
- Missing scheduled meetings, failure to return phone calls, and/or maintaining contact after written notification of non-compliance.
- Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities.
- Failure to complete activities and/or goals within the specified time frames; and/or
- If the participant's housing assistance has been terminated.

Participants who fail to meet their obligations above, as determined by an FSS coordinator, will be given the opportunity to attend appeal in writing within 10 business days. If an appeal is submitted, a review of the Contract of Participation, Individual Training and Services Plan, and all related documentation will be conducted for a final determination.

If the review sustains the termination or the appeal is not requested by the FSS family, a notification of termination will be made to the family by letter stating:

1. The specific facts and reasons for termination.
2. A statement informing the family of their right to request an informal hearing and the date by which this request must be received (see Grievance Procedures).
3. A statement informing the family that termination from the FSS program for the reasons stated therein will not result in termination of the family's housing assistance. Failure to request a hearing in writing by the deadline will result in closure of the family's FSS file and all rights to a hearing will be waived. All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. Housing assistance will not

be terminated based on non-compliance with the FSS program. The current amount of escrow in the family's escrow account will be included in the letter.

#### **b. Voluntary termination**

Participants may also be terminated from the FSS program under the following circumstances:

- Mutual consent of both parties; and/or
- The family's withdrawal from the program.

#### **c. Termination with Escrow Disbursement**

Termination with Escrow Disbursement could happen in three scenarios:

1. HABC and FSS family agree that one or more services/resources are both critical and unavailable.
2. The Head of FSS family becomes permanently disabled and unable to work after having earned escrow and there is no other household member able or willing to assume the CoP.
3. The family ports in a situation where they are unable to continue to CoP, but have not yet met the requirements for graduation and the PHA determines that there is good cause for termination with escrow disbursement.

#### **d. Grievance Procedures**

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

No appeal will be granted for voluntary withdrawal.

### **XI. Assurance of Non-Interference**

Participation in the FSS Program is voluntary. A family's decision on whether to participate in FSS will have no bearing on HABC's decision of whether to admit the family into the HABC FSS program. The family's housing assistance will not be terminated based on whether they decide to participate in FSS, their successful completion of the CoP, or on their failure to comply with FSS program requirements.

HABC will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.



## **XII. Timetable**

HABC implemented its FSS program in 1994 and will continue to implement it per this FSS Action Plan.

## **XIII. Reasonable Accommodations, Effective Communications, and Limited English Proficiency**

### **a. Requests for Reasonable Accommodations**

A person with disabilities may request reasonable accommodations to facilitate participation in the FSS program. Requests will be considered on a case-by-case basis. Requests should be made initially to the FSS coordinator. If a family is not satisfied with the determination, the family may submit a request in writing in accordance with the agency's reasonable accommodations policy. The policy is available on the HABC Administrative Plan chapter 2.

### **b. Request for Effective Communications**

A person with disabilities may request the use of effective communication strategies in order to facilitate participation in the FSS program. Requests should be made initially to the FSS coordinator as a reasonable accommodation. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's policy. The policy is available on the HABC Administrative Plan chapter 2.

### **c. Limited English Proficiency**

HABC will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available on the HABC Administrative Plan chapter 2.

## **XIV. Coordination of Services**

### **a. 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 services.

## **b. Program Coordinating Committee**

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 one or more FSS Program Coordinators and one or more participants of the HABC FSS program. PCC may also include partners of the various entities that serve as a referral network for our residents, which includes but are not limited to non-profit service providers, government agencies, financial empowerment organizations, education institutions, and private businesses.

This collaboration is expected to provide feedback to the FSS team on methods to enhance the FSS program.

## **XV. FSS Portability**

### **a. Portability in the initial 12 months**

HABC FSS participants may not exercise portability within the initial 12 months after signing a Contract of Participation.

A Housing Choice Voucher FSS participant is eligible to exercise portability per the policies of the HABC's Housing Choice Voucher Administrative Plan chapter 15.

### **b. Moves into the PHA's jurisdiction**

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.

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 Family Selection Procedures section of this FSS Action Plan.

### **c. FSS termination with disbursement for porting families**

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, HABC will closely examine the family's progress to determine if it would be appropriate to exercise FSS Termination with Disbursement as discussed above in the section on Termination.

Where continued FSS participation is not possible, HABC will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but

are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR § 984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS program.

#### **XVI. Other Policies**

The HABC FSS program will be according with the HABC HCV Administrative Plan, HABC PHA Plan and HABC standard operating procedures.

#### **XVII. Definitions**

**PHA** means Public Housing Authority.

**HABC** means Housing Authority of Bexar County.

**Certification** means a written assertion based on supporting evidence, provided by the FSS family or the PHA.

**Contract of Participation (CoP)** means a contract, in a form with contents approved by HUD, entered into between an 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 (ITSPs) entered into between the HABC and all members of the family who will participate in the FSS Program.

**Effective date of Contract of Participation (CoP)** means the first day of the month following the date in which the FSS family and the PHA entered into the CoP.

**Eligible families** means a current residents of Public Housing (Section 9) and current Section 8 program participants, as defined in this section, including those participating in other local self-sufficiency programs.

**Enrollment** means the date that the FSS family entered into the CoP with the [organization].

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

**FSS escrow account (or, escrow)** means the FSS escrow account authorized by section 23 of the 1937 Act, and as provided by § 984.305.

**FSS escrow credit** means the amount credited by the [organization] to the FSS family's FSS escrow account.

**FSS family** means a family that resides in Public Housing (Section 9) or receives Section 8 assistance or receives HUD Project-Based Rental Assistance for a privately owned property, and that elects to participate in the FSS Program, and whose designated adult member (head of FSS family), as determined in accordance with § 984.303(a), has signed the CoP.

**FSS family in good standing** means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the [organization]; and is in compliance with the regulations regarding participation in the relevant rental assistance program.pro

**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” set forth in this § 984.103.

**FSS slots** refers to the total number of families (as determined in the Action Plan and, for mandatory programs, in § 984.105 of this part) that the PHA will serve in its 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; working with the community and service partners; and tracking program performance.

**FY** means Federal Fiscal Year (starting October 1 and ending September 30, and year 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 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 [organization] in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

- (1) The final and interim goals for the participating FSS family member;
- (2) The supportive services to be provided to the participating FSS family members;
- (3) The activities to be completed by that family member; and, (4) The agreed upon completion dates for the goals and activities.

**Owner** means the owner of multifamily assisted housing.

**Self-sufficiency** means that an FSS family is no longer receiving Section 8, Public Housing 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 escrow account funds.

**Supportive services** mean those appropriate services that the PHA will coordinate on behalf of an FSS family under a CoP.

**Welfare assistance** means (for purposes of the FSS program only) income assistance from Federal, (i.e. Temporary Assistance for Needy Families (TANF) or subsequent program) State, or local welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs.