



Housing Authority of the City of Austin

Established in 1937

November 19th, 2018

To Whom It May Concern:

NOTICE OF PROPOSED REVISIONS TO FAMILY SELF-SUFFICIENCY (FSS) ACTION PLAN

The Housing Authority of the City of Austin (HACA) will receive written comments regarding the enclosed proposed revisions to the HACA FSS Action Plan during a thirty-day public comment period to commence November 20th, 2018 through December 19th, 2018. HACA previously updated its FSS Action Plan in 2011. The 2011 FSS Action Plan was recently updated to provide further definition and explanation of the FSS Program and to include the new enrollments of Project Based Rental Assistance participants. The overall goals and objectives to the FSS Program remain the same, but the additional revisions will help provide more clarification and guidance to the staff who implement the program.

All copy of the proposed changes is available in the links below. Copies of the full Action Plan are also available at the HACA Central Office (1124 S IH 35, Austin, TX 78704) or on our website at www.hacanet.org.

All written comments are to be mailed or hand delivered to the following address:

**Housing Authority of the City of Austin
Attn: President and CEO
1124 IH 35 South
Austin, TX 78704
Or emailed to: Executive@hacanet.org**

The Housing Authority of the City of Austin Board of Commissioners will vote on the adoption of the proposed revisions to the FSS Action Plan on Thursday, December 20, 2018, at the HACA Central Office located at 1124 South IH 35, Austin, Texas 78704 at 12:00 p.m. A forum will be available during Citizens Communication to voice your concerns. The date, time and location of the meeting are subject to change. See HACA website at www.hacanet.org for updates.

If you should have any questions pertaining to the proposed revisions, please call 512-477-4488 ext. 1300.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Gerber", is written over a light blue rectangular background.

Michael Gerber,
President & CEO

The changes and/or additions in the attached 2018 FSS Action Plan are described in bold below for each section and highlighted in the Action Plan. **Note: Throughout the document, the term “FSS member” has been replaced with “FSS participant” as preferential term.**

I. INTRODUCTION

Paragraph One: **Added explanation that PBRA families will be included in a combined FSS program along with HCV and PH; included latest revision date.**

Paragraph Two: **Included “Project Based Rental Assistance” in listing of residents served by the**

II. TERMS AND DEFINITIONS:

Contract of Participation (CoP): **Added form “9831A for Multifamily FSS” to include new PBRA participants**

Escrow Account: **Added “9831C for Multifamily (PBRA) FSS” and “PBRA FSS Program” to include these new PBRA participants**

FSS participant/Head of Household (HOH): **Added PBRA lease to list of documents**

Individual Training and Services Plan (ITSP): **Added “9831B for Multifamily FSS” to include ITSP form for PBRA families.**

Suitable Employment: **Removed “32 hours per week” from definition in accordance with new NOFA. Added statement about reasonable accommodations.**

III. FAMILY DEMOGRAPHICS – PUBLIC HOUSING

**Added explanation of RAD conversion of PH properties
(Demographics updated as of 11/14/18)**

IV. FAMILY DEMOGRAPHICS-PROJECT BASED RENTAL ASSISTANCE PROGRAM

**Added this program and intention to serve PBRA families with this combined program with HCV and PH families.
(Demographics updated as of 11/14/18)**

V. FAMILY DEMOGRAPHICS-HOUSING CHOICE VOUCHER PROGRAM **(Demographics updated as of 11/14/18)**

VI. FSS PROGRAM PARTICIPANTS- ANTICIPATED PARTICIPATION: **Added Project Based Rental Assistance program**

VII. ESTIMATE OF PARTICIPATING FAMILIES

A. Public Housing- **Added language about PBRA families to be served with RAD**

conversion

B. Project Based Rental Assistance- **Added this category of families and maximum caseloads planned**

C. Housing Choice Voucher Program- **Includes language regarding FSS Coordinators who serve PH and PBRA members to also have HCV members as needed to maintain their caseload sizes.**

Altered waitlist posting to remove set date of opening every year.

VIII. TIMETABLE FOR IMPLEMENTATION: **Description added of the plan to add PBRA families into the existing joint PH and HCV FSS Program.**

IX. OUTREACH EFFORTS: **Changed job title of HCV staff handling rent calculation Removed “job fairs” and added “workshops” to reflect services provided more often to members; added sexual identity and sexual orientation to list of factors that will not be considered during outreach**

X. SELECTION PROCEDURES - PUBLIC HOUSING AND HOUSING CHOICE VOUCHER PROGRAM: **Added PBRA Program**

A. Reasonable Accommodations: **Added language about obtaining suitable employment**

B. Non-discrimination: **Added sexual identity and sexual orientation to list of protections**

C. Application Procedures- (a)**Added title of FSS Program supervisor; added PBRA Program: added HCVFSS to language about porting.**

(b) **Added email for method of contact; Altered language on timeline for FSS orientation to further accommodate new applicants**

XI. METHOD OF IDENTIFICATION FOR FAMILY SUPPORT NEEDS

B. Family Responsibilities: **Added PBRA to listing of programs**

C. HACA Responsibilities: **Added email to methods of contact; added PBRA to staffing and updated title for HCV staff**

XII. INCENTIVES TO ENCOURAGE PARTICIPATION – PUBLIC HOUSING AND HOUSING CHOICE VOUCHER PROGRAM: **Added Project Based Rental Assistance to this title**

A. Formed Partnerships with Public and Private Entities: **Added language about HACA’s non-profit that provides FSS members with supportive services**

B. Escrow Account: **Added language about the Jobs Plus EID and PBRA escrow calculation**

1. Deposits: **Added PIH Notice for Multifamily FSS to address PBRA families**

2. Disbursements: **Added language about HCV families being only program that can graduate to income level. Added PIH notice about Multifamily FSS, FSS staff duties, and removed EIV language for income verification.**

Edited language about authorization hierarchy since programs merged into one under one Manager and one Vice President.

3. Flat Rent (PH); Earned Income Disallowance and other Incentives:

Changed “30% of family’s adjusted monthly income” to “family rent” for accuracy.

Added language to include Jobs Plus EID

**XIII. CORRECTIVE ACTION: FAILURE TO MEET FAMILY RESPONSIBILITIES-
Removed additional 90 days from probationary period**

XIV. CONTRACT TERMINATION AND WITHHOLDING OF SUPPORTIVE SERVICES:

1. Added Project Based Rental Assistance

10. Removed “if HUD no longer funds FSS Coordinator Program” in accordance with regulations

Added language for option of PHA to not allow previous participants to re-enter program at the discretion of the PHA.

XV. APPEAL PROCEDURES:

Added Project Based Rental Assistance; updated staff titles

XVI. HUD FSS CONTRACT TERM, EXTENSION, MODIFICATION, AND ADDITIONAL TERMS

A. Added “Project Based Rental Assistance”

3.Changed time-frame to alter ITSP

4. Added PBRA to list of programs; change to allow for HCV graduates due to income to re-enroll in program if qualified after a one-year waiting period if no escrow was paid out to family upon graduation.

XVII. ASSURANCE OF NON-INTERFERENCE- PUBLIC HOUSING AND HOUSING CHOICE VOUCHER PROGRAM: Added “Project Based Rental Assistance” to title

XVIII. COORDINATION WITH LOCAL SERVICES: Updated WIA to WIOA

XIX. PROGRAM COORDINATING COMMITTEE (PCC): Removed contract or MOU as a requirement. Removed Austin Academy and added Literacy Coalition of Central Texas; added Austin Energy as partner; removed Caritas of Austin; added services to Foundation Communities

Added language on PCC in relation to PBRA FSS

XX. FSS COORDINATOR FUNDING:

Added language for FSS Coordinator funding per requirements of H-2016-08

XXI. CERTIFICATION OF COORDINATION: Changed language to reflect one FSS Program and update WIA to WIOA; Updated CEO name



Housing Authority of the City of Austin

Family Self-Sufficiency Action Plan

November 19th, 2018

HOUSING AUTHORITY OF THE CITY OF AUSTIN

FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN

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I. INTRODUCTION

This Action Plan describes the goals and objectives of the Housing Authority of the City of Austin (HACA)'s Family Self Sufficiency (FSS) program, that will serve as one program combining the residents of Public Housing, the Housing Choice Voucher Program, and Project Based Rental Assistance families converted from Public Housing under RAD. This Plan is a revision of a previous Action Plan, dated April 16, 1999 and updated February 19th, 2004, and August 24th, 2011. As an agency, HACA works to break the cycle of poverty by serving as a catalyst for residents to become economically self-sufficient. The following Action Plan for HACA's Family Self-Sufficiency Programs describes the ongoing efforts to foster self-sufficiency among HACA residents.

The purpose of the Family Self-Sufficiency FSS programs is to promote a coordination of public and private resources to support Housing Choice Voucher, Public Housing, and Project Based Rental Assistance residents' (hereafter referred to as Housing Authority residents) efforts to achieve economic self-sufficiency leading to economic security. In support of the FSS program objectives, HACA promotes a dynamic partnership between FSS families, staff, and the community that empowers participants to overcome socio-economic barriers and achieve their potential to fully participate in the economy.

Using housing as the stabilizing factor, resources and services are coordinated to assist residents who are unemployed or under-employed to become fully employed. HACA and the FSS family Head of Household enter a 5 yr agreement governed by the HUD FSS Contract of Participation (CoP). HACA's FSS Coordinators work with FSS participants to leverage resources in order to address the participant's identified gaps in education, skill development, supportive services, job training, and job placement that present challenges to achieving financial security.

HACA's FSS Coordinators provide individual case management with the goal of fostering the self-confidence and skills required to achieve financial security. In order to graduate from the FSS program, the family must become free of welfare assistance. Welfare assistance, for the purposes of the FSS Program only, as defined in 24 CFR §984.103, is income from Federal or State welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs (commonly referred to as "Temporary Aid to Needy Families" or "TANF").

II. TERMS AND DEFINITIONS:

To promote a common vocabulary to facilitate our work of assisting families build economic self-sufficiency, commonly used terms and phrases have been defined as follows:

Financial security and economic self-sufficiency for the individual

Financial security and economic self-sufficiency is the condition of having stable income or other resources to support a standard of living now and in the foreseeable future without the help of public assistance.

Public assistance:

Public assistance for the purposes of the FSS program is defined as welfare payments or other payments to families or individuals, based on need, which are made under programs funded, separately or jointly, by Federal, State or local governments. It includes only cash payment for ongoing basic needs (TANF).

Contract of Participation (CoP):

The Family Self-Sufficiency (FSS) Program Contract of Participation, HUD form 52650 and 9831A for Multifamily (PBRA) FSS, which set forth the principal conditions and terms governing participation in the FSS program. The contract includes the rights and responsibilities of both the FSS participant and HACA. The contract also includes the Individual Training and Service Plan (ITSP): a section of the CoP that becomes part of the family responsibilities under the contract, addresses personal and professional goals as benchmarks to be achieved, plus activities and services to assist the family meet goals leading toward self-sufficiency

Escrow Account: Under the terms of the CoP, eligible participants will have deposits made into an escrow account, operated and maintained by HACA, according to guidelines set forth in the CoP and HUD's FSS Escrow Account Worksheet, form HUD-52652 and 9831C for Multifamily (PBRA) FSS. There will be one interest bearing Escrow Account for all FSS participants in PH FSS and separate accounts for participants in the HCV and PBRA FSS program. Each FSS participant will have a separate sub-line item, which will include all deposits and calculated interest.

FSS participant/Head of Household (HOH):

The HOH for the FSS contract must be the same adult family member who is HOH for purposes of PH lease, PBRA lease and Housing Choice Voucher Program. This individual assumes legal and financial responsibility for the household and is listed on the FSS contract.

Individual Training and Service Plan (ITSP):

As part of the CoP, form HUD-52650 and 9831B for Multifamily FSS, a written plan is prepared in cooperation with each FSS participant. The ITSP includes personal and professional goals to be accomplished by the participant before the ending date of CoP. Family members over the age of 18 who choose to, may also execute an individual training and services plan under the contract.

Seeking Employment:

"Actively seeking" shall include activities to prepare for employment. This may entail attending workforce development classes such as résumé review, interview skills etc, or conducting job search by sending out resumes, attending job interviews and, submitting employment application. These activities will be documented by submitting a minimum of 20 applications per week, or class attendance records/certificates of completion.

Suitable Employment:

Employment obtained and maintained by the FSS participant that will allow for independence from welfare assistance i.e. allow the family or individual to meet basic needs without public assistance and lead to building financial security. It may include full time employment or part time employment in combination with other resources available to the family or individual. The employment that is obtained must be reasonably expected to continue. Ideally income is expected to be related to a job training program completed as identified in the individual training and services plan, with consideration given to available job opportunities in the area. Reasonable accommodations will be made by request of those claiming a disability.

Earned Income:

Income or earnings included in annual income from wages, tips, salaries, other employment compensation, and self-employment. Earned income does not include pension or annuity, transfer payments, lump sum payments any cash or in-kind benefits, or funds deposited in or accrued interest established by a PHA on behalf of a participating family.

III. FAMILY DEMOGRAPHICS – PUBLIC HOUSING

The Housing Authority of the City of Austin (HACA) has historically managed 1,928 Conventional Public Housing units, which include 1,484 units dedicated to families. HACA is in the process of converting all Public Housing stock to Project Based Rental Assistance under RAD. There are currently 4 PH properties that have yet to be converted to PBRA at the time of the posting of this Action Plan. Characteristics of the families living within these public housing family developments as of November 14th, 2018, include the following:

A. Family Size – Public Housing

- The average family size is 2.23.

B. Race/Ethnicity – Public Housing

- Hispanic: 457/50%
- Non-Hispanic: 460/50 %
- Black: 353/38%
- White: 537/59%
- Asian: 12/1%

C. Income – Public Housing

- The average income of a public housing resident living at a family site: \$11,948

D. Sex of Head of Household– Public Housing

- Females: 270/67%
- Males: 131/33%

E. Average Age – Head of Household – Public Housing

- 52

IV. FAMILY DEMOGRAPHICS – PROJECT BASED RENTAL ASSISTANCE PROGRAM

HACA converted 14 PH sites to PBRA under RAD. Under this Action Plan, HACA intends to enroll new families into a combined FSS Program along with remaining PH families and HCV FSS families.

A. Family Size – PBRA

- The average family size is 1.79

B. Race/Ethnicity – PBRA

- Hispanic: 1,473/27%
- Non-Hispanic: 1,149/21%
- Black: 782/14%
- Other: 96/2%
- White: 1,705/31%
- Asian: 36/1%
- Declined to report: 225/4%

C. Income – PBRA

- The average income of a PBRA resident living at a family site: \$13,784.67

D. Sex of Head of Household– PBRA

- Females: 796/78%
- Males: 228/22%

E. Average Age – Head of Household – PBRA

- 49.8

V. FAMILY DEMOGRAPHICS – HOUSING CHOICE VOUCHER PROGRAM

The Housing Authority of the City of Austin manages 5,827 vouchers. Characteristics of the families living within the Housing Choice Voucher Program, as of November 14th, 2018, include the following:

A. Family Size – Housing Choice Voucher

- The average family size is 3.5

B. Race/Ethnicity – Housing Choice Voucher

- Hispanic: 4,274/33%
- Non-Hispanic: 8,542/67%
- Black/African American: 7,128/56%
- White: 5,537/43%
- Asian: 95/1%

C. Income – Housing Choice Voucher

- The average income of a Housing Choice Voucher resident is \$15,478

D. Average Age – Head of Household - Housing Choice Voucher

- 50

VI. FSS PROGRAM PARTICIPANTS – ANTICIPATED PARTICIPATION

HACA will make a good faith effort to have the FSS program emulate the demographics of the residents of HACA's Public Housing, Project Based Rental Assistance, and Housing Choice Voucher program.

VII. ESTIMATE OF PARTICIPATING FAMILIES

A. Public Housing

HACA will serve the public housing residents that are currently enrolled in the FSS Program. As the remaining HACA properties convert to PBRA, new enrollments to the FSS Program will occur as prescribed by HUD Multifamily FSS.

B. Project Based Rental Assistance

HACA will serve as many participants as are interested, are in good standing with the agency and in compliance with any payment arrangement that may exist, and can be accommodated with current staff as determined by HACA. To provide optimum case management, HACA will serve a maximum of 65 persons per FSS Coordinator. The opening of the FSS waitlist will be posted at the HACA Administrative Offices when space is available on the FSS Program. Recruitment of new families will be ongoing to replace any available openings on a first come, first served basis. Sections VII and VIII of this plan detail outreach and selection procedures. HACA will evaluate its capacity to serve more FSS participants on an ongoing basis.

C. Housing Choice Voucher Program

HACA had 31 Section 8 Rental Certificates that were allocated in September 1993, and were designated for the Family Self-Sufficiency Program. HACA was allocated 41 mandatory FSS slots under the Quality Housing and Work Responsibility Act (QHWRA). Per the amended mandatory requirements with (QHWRA), HACA reduced the mandatory slots by one for each FSS graduate fulfilling the family's contract of participation on or after October 21, 1998, and completed the mandatory program (Phase I). HACA serves as many participants as it can accommodate with current staff (as determined by HACA), and maintains a maximum of 65 participants per HCV FSS Coordinator. FSS Coordinators serving PH and PBRA families will also include HCV families on their caseloads as needed to maintain total minimum caseload sizes of 50. The availability of the FSS Waitlist will be posted at the HACA Administrative Offices when the program has capacity to bring on new participants. Recruitment of new families will be ongoing to replace any available openings. Section VIII and XI of this plan describe outreach and selection procedures. HACA will evaluate its capacity to serve more FSS participants on an ongoing basis.

VIII. TIMETABLE FOR IMPLEMENTATION

The Housing Authority of the City of Austin began its FSS program in 1994 and has continuously operated both PH FSS and HCV FSS programs since, combining the two programs after the grant was merged into one by HUD. New participants from PBRA properties converted under RAD will be enrolled onto the FSS program as prescribed by HUD Multifamily FSS guidelines and incorporated into the existing joint HCV and PH FSS Program.

IX. OUTREACH EFFORTS

HACA will conduct ongoing outreach to all Housing Authority households by way of newsletter, flyers and brochures describing the FSS Program and announcing various FSS events. Public Housing and PBRA Managers and Housing Choice Voucher Program's Housing Eligibility Specialists will distribute FSS brochures to residents at annual re-examinations and initial orientations. HACA will also conduct FSS promotional activities including workshops, resident empowerment events, and other such activities.

In order to develop the resources and support necessary for **FSS participants** to achieve their goals, outreach efforts to service providers will be ongoing. The FSS Program Coordinating Committee (PCC) will also assist with outreach efforts to local area service providers. Outreach will be made to all HACA families without regard to race, color, religion, **sexual identity, sexual orientation**, handicap, familial status, or national origin.

X. SELECTION PROCEDURES - PUBLIC HOUSING AND HOUSING CHOICE VOUCHER PROGRAM **AND PROJECT BASED RENTAL ASSISTANCE**

A. Reasonable Accommodations

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

B. Non-discrimination

Selection is made without regard to race, color, religion, **sexual identity, sexual orientation**, handicap, familial status, national origin, sexual orientation or handicap, in compliance with Title VI of the Civil Rights Act of 1964, as amended, Title VII of the Civil Rights Act of 1968, as amended, and Executive Order 11063.

C. Application Procedures

(a) Waiting List:

Recognizing that the level of interest in FSS participation may occasionally exceed the capacity of HACA to meet, a waiting list of interested families may be deemed necessary. This will be maintained as a pool of possible participants and maintained by HACA's FSS Coordinators with administrative oversight provided by **the FSS Program Manager.**

The waiting list will be opened at least annually as described under section VI A and VI B. There will be separate waiting lists for the **Project Based Rental Assistance Program** and the Housing Choice Voucher Program, if a waiting list is deemed necessary. To be placed on the waiting list, interested HACA families must complete and return an FSS Interest Form. Upon completion and submission of the FSS Interest Form, a member of HACA's FSS team will date stamp the information and the Housing Authority resident will be placed on the appropriate waiting list (if a waiting list exists), and allowed entry into the FSS Program as space allows. If there is a waiting list, Housing Authority residents who have ported in to HACA from another jurisdiction and were actively participating in the FSS program at the original Housing Authority, will receive priority and may be absorbed into the **HCV** FSS program without first becoming waitlisted.

(b) Application:

As openings to the FSS waiting list become available, individuals on the list will be contacted via mail **or email** by order of date and time listed, and provided a program application form. The resident will have fourteen (14) calendar days to complete and return the FSS Application Form, or if failing to do so, be removed from the list and consideration for enrollment. Delisted residents will have the option to re-apply to the waitlist at the next waitlist opening. There is no limit to successive applications if the resident chooses to re-

apply. Successful completion and timely submission of the FSS Application Form shall serve as a level of motivational screening for HACA's FSS program. Residents with disabilities or limited English proficiency (LEP) may request support completing the form.

Eligible applicants will be contacted by an assigned FSS staff within 2 weeks of their application date for a scheduled group or one-on-one orientation. At the conclusion of the orientation the applicant may make a decision to execute a contract of participation and ITSP at that time but no later than 7 business days after the orientation. The applicant also has the option to decline participation. If the applicant fails to attend the scheduled orientation, an opportunity will be made available for a rescheduled orientation appointment within two weeks.

If the applicant fails to attend the rescheduled appoint (2nd attempt) and has failed to contact the assigned HACA FSS staff within ten business days, (i.e. applicant is counted as "no call, no show") HACA will interpret the no call, no show to mean the applicant has withdrawn their interest in the program, and the applicant will automatically be withdrawn from consideration. If the resident chooses to re-apply to the waitlist at a later time, the procedures defined above in (a) shall be followed.

In the event the applicant is unable to attend the scheduled orientation and initiates the request for a rescheduled appointment, a rescheduled appointment will be made within two weeks. If the applicant initiates a request for a 2nd rescheduled appointment they will be rescheduled. If the applicant fails to attend the orientation two (2) times, they will be not be eligible to reapply to HACA's FSS program or open waitlist before a six (6) month waiting period. This period is the second motivational screening for level of interest. If at the time of the 2nd rescheduled appointment, the applicant requires more than 30 days for intake appointment, they will be placed back on the waitlist.

XI. METHOD OF IDENTIFICATION FOR FAMILY SUPPORT NEEDS

The success of participants' outcomes and general success of the Family Self-Sufficiency Program will depend greatly on how effectively the needs of the participant family are addressed and how committed the FSS participant is to becoming self-sufficient. HACA's FSS team will assess the needs of each FSS family on an ongoing period basis, using case-by-case evaluation and self-reporting, in addition to any tools pursuant to delivering effective case management.

A. Individual Training and Service Plan (ITSP)

A member of HACA's FSS team and the head-of-household will collaboratively develop an Individual Training and Service Plan (ITSP), which establishes the family's specific interim and final goals. The goals set out in the ITSP must lead to economic self-sufficiency. One interim goal for each family currently receiving TANF must be that the family must become independent of welfare assistance, as defined in 24 CFR §984.103, at least one year prior to the expiration of the term of the FSS CoP. The role of the FSS staff in the creation of the ITSP is to collaborate with the family to ensure such goals are likely to lead to self-

sufficiency and employment, and that the resources are identified and available to enable families to succeed. The ITSP is not a static document but must demonstrate measurable progress towards milestones and will be reviewed at least annually to ensure relevance of interim goals to the final goal of self-sufficiency, and the availability and access to resources to meet said goals is within the scope of the family's abilities.

B. Family Responsibilities

In order to track participant progress towards meeting their interim goals and to provide follow-up supportive services, the FSS **participant** must:

- 1) Attend all scheduled appointments and FSS quarterly meetings;
- 2) Seek and maintain suitable employment after completion of any job-training program listed on the ITSP;
- 3) Complete the activities within the specified completion date as documented in the ITSP;
- 4) Provide HACA with updated information about the family's participation in services related to the goals listed, and the FSS Program in order to evaluate HACA's partnerships with community organizations, private business entities, and governmental agencies. This could include information regarding employment, job interviews, training, educational attendance and other FSS services and activities;
- 5) Comply with the terms of the Housing Lease Agreement;
- 6) Fulfill the family obligation requirements under the Public Housing, **Project Based Rental Assistance Program** and Housing Choice Voucher Rental Programs. This includes reporting changes in residency, family composition, or income to HACA; and
- 7) Become free of welfare assistance and remain welfare-free for at least 12 consecutive months prior to expiration date of the FSS CoP.

C. HACA Responsibilities

In order to monitor the progress of each participant, HACA's FSS team will do the following:

- 1) Contact FSS **participant** quarterly to determine progress made toward defined goals via personal interviews, phone contact, **email** or group meetings;
- 2) Work with Public Housing and PBRA Managers or Housing Choice Voucher Program **Eligibility Specialists** to determine changes in residency, family composition, or income and obtain referrals for new **FSS participants**;
- 3) Maintain a contact record documenting tasks and accomplishments made towards achieving goals for all **FSS participants**;
- 4) Conduct regularly scheduled orientations for interested potential new participants;
- 5) Provide referrals and supportive services (as defined in Section XI.A) available to FSS families; and

- 6) Provide annual updates to the FSS Program Coordinating Committee (PCC) and to HACA's Board of Commissioners on successes of the FSS program and the participants.

XII. INCENTIVES TO ENCOURAGE PARTICIPATION – PUBLIC HOUSING, PROJECT BASED RENTAL ASSISTANCE, AND HOUSING CHOICE VOUCHER PROGRAM

A. Supportive Services

In order to support FSS participants in achieving their goals, the HACA FSS team will coordinate the following services or will provide referrals to partnering agencies:

- 1) Childcare
- 2) Transportation
- 3) Life Skills Training
- 4) Education
- 5) Employment Opportunities and Job Training
- 6) Financial Literacy
- 7) Home Ownership Training
- 8) Parenting Skills

In order to assist the FSS families with completing the goals set forth in the FSS Contract of Participation, HACA will provide ongoing support, follow-up, tracking, counseling, referrals and other supportive services to the families.

B. Formed Partnerships with Public and Private Entities

HACA has formed partnerships with public and private entities to provide opportunities that enable and empower FSS families to become self-sufficient. The public and private entities will provide supportive services for the FSS program, including the resources listed above. In addition to these partnerships, HACA's non-profit subsidiary, Austin Pathways, provides limited supportive services to FSS families subject to available funding. This supplementary support is based on the evaluated need of FSS participants and is limited and provided as available at the approval of HACA executive staff. HACA staff will work to continually expand the range of services available through partnerships.

C. Escrow Account

Families participating in the FSS Program may, if eligible, accumulate money in an escrow account when their earned income increases. Each time eligible families' earned income increases, this will typically result in a rent increase. A portion of the increased rent amount is deposited into an escrow account. The amount credited to the escrow account will be calculated using the formula required by federal regulations, as defined in 24 CFR §984.305. The escrow calculation is based on increases in the rent actually paid by the FSS family, potentially capped due to payment of flat rent for Public Housing families or Jobs

Plus Earned Income Disallowance (EID). This is discussed further in Section C.3. The escrow for PBRA families follows the same principle as escrow calculations for PH and HCV, and will be calculated in accordance with Notice H-2016-08.

1. Deposits

HACA will deposit the FSS account funds for each eligible family into one main escrow account, and maintain a separate General Ledger Account in the Housing Authority of the City of Austin books. The FSS General Ledger Account will consist of subsidiary ledgers for each individual eligible FSS participant including, but not limited to, name of participant, date participant entered the program, individual escrow transactions by date and amount, interest earned on individual balances and date that the account is terminated or disbursed. The main escrow account will be invested in HUD-approved investments.

Interest earned on the main escrow account will be earned on a monthly basis and allocated to each individual account. During the time of the Contract of Participation, HACA shall credit periodically, at least annually, to each family's FSS account, the amount of FSS credit determined in accordance with 24 CFR §984.305 and H-2016-08 for Multifamily FSS (PBRA).

2. Disbursements

The final disbursement of FSS account funds is made to the head of household of the FSS family when the following conditions have been met:

- 1) The FSS family has fulfilled all of its obligations under the Contract of Participation on or before the expiration of the contract term, including any extension thereof. For HCV FSS families only, qualification to graduate may also be met if 30% of the family's monthly adjusted income equals or exceeds the published existing housing fair market rent for the size of the unit for which the FSS family qualifies based on HACA's occupancy standards (even if the contract termination date or any extension thereof, have not expired);
- 2) The head of the household certifies that no member of the FSS family is a recipient of federal or state welfare assistance, as defined in 24 CFR §984.103 and H-2016-08. The FSS Coordinator will verify this information by obtaining documentation and contacting welfare agencies.
- 3) The Housing Authority resident must live in the jurisdiction of HACA for at least twelve (12) months prior to contract completion date to receive the escrow funds.

HACA will pay the head of household the amount in the family's escrow account less any outstanding balances owed to HACA.

HACA may permit the family to make partial withdrawals from the FSS escrow account before completion of the contract if the family has completed at least one goal set forth in

the ITSP and the funds are needed to complete the CoP. Requests for interim disbursements must be made in writing by the head of the household and follow the proper HACA Standard Operating Procedures, which is subject to approval. The request shall be no more than ½ of the amount in the FSS escrow account, unless authorized by the Vice President of Assisted Housing.

The FSS Program Manager will review requests for interim disbursements and will make a recommendation to the Vice President of Assisted Housing. The President and CEO shall retain final approval. Early disbursements of escrow funds are at the sole discretion of HACA. Partial disbursement of escrow funds will be allowed one time per year and must be limited to goal specific requests.

3. Flat rent (PH); Earned Income Disallowance and other Incentives

Public Housing Flat rent: When a Public Housing FSS participant's earned income increases and surpasses the established flat rent for his/her housing unit, the FSS participant will have the option to pay, without penalty, either the flat rent amount or the higher, income based rent amount. If the participant chooses to pay flat rent, any escrow accrued will be calculated based on the flat rent amount actually paid by the participant, versus the Family Rent.

Earned Income Disallowance (EID): EID was established by QHWRA to encourage residents to become self-sufficient by rewarding residents who go to work or have increased earnings. Residents who meet EID, as defined in 24 CFR §960.255, will be excluded from the aggregate of earned income for the purposes of calculating escrow. This includes residents participating in Jobs Plus EID as well.

To this end, FSS Participants whose earned income increases will not accrue escrow credit during the period of time in which 100% of the earned income increase is being disallowed. FSS participants on EID will be eligible to begin accumulating escrow at the Beginning of the phase in period, when 50 % of their income determination becomes included in the rent calculation. The amount of income included in rental calculation will be the amount included in the escrow calculation. Members participating in Jobs Plus EID can earn escrow in this manner if the calculated escrow amount does not exceed the monthly escrow amount the member was earning at the time of entry onto JPEID.

Other incentives: Gift certificates, awards, ribbons, plaques, banquets, etc., may be offered to motivate, reward and recognize participants as they progress through interim goals and achieve successful CoP completion. There may be times when no other incentive is available other than escrow accounts. HACA is in no way obligated to provide monetary or non-monetary incentives other than the escrow account.

XIII. CORRECTIVE ACTION: FAILURE TO MEET FAMILY RESPONSIBILITIES

FSS participants may be subject to corrective action should the head of household fail to fulfill the Family's Responsibilities as defined in Section X, Paragraph B. Corrective Action may include being placed on probation for a period of ninety (90) calendar days. During the 90 days there will be an addition of conditional and mandatory activities added

as an amendment to the ITSP. These activities will address persistent obstacles to meeting benchmarks outlined in the ITSP, and to help the participant identify and enact strategies to move forward with renewed momentum. Should the FSS Participant violate the terms of the FSS Probationary Agreement, the FSS contract will be terminated as outlined in Section XIII.

XIV. CONTRACT TERMINATION AND WITHHOLDING OF SUPPORTIVE SERVICES

A. FSS Contract Termination

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

- 1) The Contract of Participation is automatically terminated if the family's Public Housing, Project Based Rental Assistance, or Housing Choice Voucher Program assistance is terminated in accordance with HUD requirements;
- 2) If the family violates family housing obligations. A participant family's housing obligations are described in the Certificate of Family Participation/Lease Agreement and the Family Obligation under the Housing Choice Voucher Contract.
- 3) If the family breaches the FSS contract. The family's obligations for the FSS program are described in FSS Contract of Participation, HUD -52650.
- 4) If the FSS family's head of household fails to become independent from welfare assistance;
- 5) If the FSS family's head of household fails to meet the employment obligations of the contract;
- 6) The FSS participant and HACA sign a written agreement mutually agreeing to terminate the contract;
- 7) HACA determines that the family has not fulfilled its responsibilities under the FSS Contract of Participation and that there is not good cause for the family's failure to fulfill such responsibilities;
- 8) The family moves outside of HACA's jurisdiction under Housing Choice Voucher Program portability procedures and enters the FSS Program of another housing authority;
- 9) HACA determines that the resources and services necessary to complete the contract are not available;
- 10) Any related new HUD mandate resulting in changes to the contract of participation and/or the related CFR,
- 11) Operation of law.

If for any reason HACA terminates the FSS Contract of Participation, the FSS participant will not be allowed to participate in any FSS programs administered by HACA for one year. HACA may use discretion in determining eligibility for return to the program in reference to the reason for original termination. For example, in cases of fraudulent or threatening behavior by a previous participant, repeat participation may be declined.

XV. APPEAL PROCEDURES

Housing Authority residents may file a grievance for any decision involving termination from the FSS Program, denial of FSS participation, escrow funds forfeited and withdrawal of the FSS application. The Housing Authority of the City of Austin's informal hearing procedures shall apply as established in Public Housing, **Project Based Rental Assistance**, and Housing Choice Voucher Program Administrative Plans. The appeal procedures for FSS can be obtained through the **FSS Program Manager** or the Informal Hearing Officer.

No appeal will be granted for voluntary withdrawal.

XVI. HUD FSS CONTRACT TERM, EXTENSION, MODIFICATION AND ADDITIONAL TERMS

A. Public Housing, **Project Based Rental Assistance, and Housing Choice Voucher Program**

- 1) The Contract of Participation shall provide that each FSS family is required to fulfill those obligations to which the participating family has committed itself under the FSS Contract of Participation no later than five years after the effective date of the contract, unless the FSS participant is terminated prior to the end of the five-year period of the contract pursuant to the provisions of this agreement.
- 2) HACA may, in writing, extend the term of the Contract of Participation for a period not to exceed two years when good cause exists for granting the extension. A family must supply a written request for an extension that includes a description of the need for the extension no later than thirty (30) calendar days prior to the expiration date of the FSS Contract of Participation. Requests for an extension shall not be approved unless circumstances beyond the control of the FSS family are evident in the need for extension. Examples of circumstances beyond the control of the FSS family include involuntary loss of employment or extended serious illness that prevented the participant from seeking or maintaining suitable employment. HACA retains the sole discretion to grant or deny an extension request.
- 3) HACA and the FSS family may mutually agree to modify the Contract of Participation. The Contract of Participation may be modified in writing with respect to the Individual Training and Services Plans, the contract term in accordance with paragraph 2 of this section, and designation of the head of the family. Modifications to the Individual Training and Service Plan may be made no later than **30 days** prior to the expiration date of the FSS Contract of Participation.

- 4) A participant may only graduate one time from either the Public Housing / PBRA or the Housing Choice Voucher FSS program. The only exception to this guideline is an HCV family that meets the qualification to graduate due to income and there is no escrow disbursement. If this is the case and the resident becomes income eligible again for the program after a one year waiting period, the family may re-enroll into the FSS program.

XVII. ASSURANCE OF NON-INTERFERENCE – PUBLIC HOUSING, PROJECT BASED RENTAL ASSISTANCE AND HOUSING CHOICE VOUCHER PROGRAM

Families choosing not to participate in the FSS program will not have their continued occupancy affected nor have their right to admission encumbered should they wish not to participate.

XVIII. COORDINATION WITH LOCAL SERVICES

In developing and revising this FSS Action Plan, and the attendant services and activities, HACA has coordinated with local employment training programs, including the CHOICES program and local Workforce Investment Opportunity Act (WIOA) programs. HACA continues to coordinate with other relevant employment, childcare, transportation, training and education programs in the Austin/Travis County areas. Service coordination is critical to participant and program success and will continue in the implementation of the FSS programs at HACA. A certification attesting to such is included as Section XXI.

XIX. PROGRAM COORDINATING COMMITTEE (PCC)

The Housing Authority of the City of Austin partners with various entities that serve as a referral network for our residents; some as paid contractors for services and others as unpaid contractors informally with or without MOU. These collaborations also serve to provide feedback to the FSS team on methods to enhance the FSS program. The Program Coordinating Committee (PCC) members will consist of a selection from among the following agencies:

- 1) Membership from select Partner Agencies, including:
 - AUSTIN COMMUNITY COLLEGE – GED and ESL classes; postsecondary education
 - AUSTIN ENERGY – Utility Assistance for FSS participants in addition to other self-sufficiency program members and the elderly/disabled residents of HACA
 - CAPITAL AREA WORKFORCE DEVELOPMENT BOARD/Workforce Solutions– job readiness training, job training; job placement; supportive services, sharing information on TANF program rules, services and benefits that support FSS families’ work efforts, encourage TANF recipients who are served by the HA to enroll in FSS

- CITY OF AUSTIN OFFICE OF NEIGHBORHOOD HOUSING & COMMUNITY DEVELOPMENT –down payment assistance program; affordable housing program
 - GOODWILL INDUSTRIES – job placement services; interviewing skills; resume writing, financial literacy and life skills training
 - AREA CHURCHES and Christian Women’s Job Corp – food pantry; emergency assistance, youth programming, workforce development opportunities targeting women
 - Any Baby Can – parenting and life skills, workforce development
 - Lifeworks – Parenting and life skills, workforce development
 - Literacy Coalition of Central Texas – workplace competency training and GED preparation
 - Skillpoint Alliance - Job readiness/workplace competency, career assessment and counseling, job training, job placement, computer literacy
 - Foundation Communities –financial management education, college planning, free tax preparation, and health insurance enrollment
 - Frost Bank – financial literacy and asset building
- Other service provided as determined

Members may be removed from the PCC at the sole discretion of HACA. The PCC will also include representatives required per the CFR - two FSS participants, one from each PH and HCV FSS Programs. A PCC is not required for PBRA FSS; however, PBRA residents will be included and served by HACA’s PCC as well since this is a combined program.


XX. FSS COORDINATOR FUNDING

FSS Coordinators will be funded through the FSS NOFA to serve HCV, PH, and PBRA residents. The Housing Authority will maintain an HCV FSS Program to maintain eligibility to apply for FSS Coordinator funding under the FSS NOFA to serve HCV and PBRA FSS participants once all public housing units are converted to PBRA.

XXI. CERTIFICATION OF COORDINATION

The Housing Authority of the City of Austin’s Family Self-Sufficiency Program has been developed to avoid duplication of services and activities. The FSS program utilizes existing networks of services in the Austin area in order to avoid such duplication. Additionally, the FSS program has been developed, and continues to be implemented in collaboration with other entities in the Austin area, including the City of Austin and the Capital Area Workforce Development Board, which administer the Workforce Investment and Opportunity Act and Choices programs. HACA 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.

Signed: _____


Michael Gerber, President and CEO

Date: 11.20.18