



Housing Authority of the City of Austin

Family Self-Sufficiency Action Plan

~~May 12, 2020~~ August 15, 2022

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 serves as one program combining the residents of Public Housing and the Housing Choice Voucher Program. This program will also continue to serve and~~ the remaining ~~Public Housing~~ Project Based Rental Assistance families previously enrolled FSS ~~with Public Housing~~ prior to ~~RAD~~ conversion to ~~Project Based Rental Assistance under RAD~~. Under this Plan, no new PBRA FSS Participants will be enrolled. This Plan is a revision of a previous Action Plan, dated April 16, 1999 and updated February 19th, 2004, ~~and August 24th, 2011, and May 12th, 2020.~~ This Action Plan reflects the changes made to the 24 CFR 984 Regulations with the Streamlining and Implementation of the Economic Growth, Regulatory Relief, and Consumer Protection Act Changes to the Family Self-Sufficiency Program, hereafter known as the FSS Final Rule. All families that enrolled in the FSS program prior to June 16th, 2022 will have the opportunity to execute new Contracts of Participation that reflect the regulation changes made with the Final Rule. 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-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~~ obtain suitable employment. HACA and the FSS ~~family Head of Household~~ head of family enter a ~~5-yr~~ into an 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~~ service coordination and coaching with the goal of fostering the ~~self-confidence~~ agency 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**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~~**Self-sufficiency means that an FSS family is no longer receiving Section 8 or any Federal, State, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency is a program objective, but not a condition for the receipt of FSS escrow account funds.**

Public Welfare assistance:

~~Public Welfare~~ 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, 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 form 9831C for Multifamily (PBRA) FSS.** There will be one interest bearing Escrow Account for all FSS participants, separated by housing assistance program: ~~PH, HCV,~~ and PBRA. Each FSS **participant** will have a separate sub-line item, which will include all deposits and calculated interest.

FSS participant/Head of Household (HOH):Head of FSS Family:

~~The HOH for the FSS contract must be the same adult family member who is HOH for purposes of PH lease and Housing Choice Voucher Program. This individual assumes legal and financial responsibility for the household and is listed on the FSS contract~~**The designated adult family member of the FSS family who has signed the CoP. The head of the FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent. Head of FSS family is required to meet the obligations of the CoP in order to graduate from the program.**

Individual Training and Service Plan (ITSP):

As part of the CoP, form HUD-52650, a written plan is prepared by PHA or owner 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 applications. These activities will be documented with copies of applications submitted or class attendance records/certificates of completion. The suitability of the level of job seeking activity will be evaluated on a case-by-case basis.

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 and lead to building financial security. Suitability of employment for participant will be determined on a case-by-case basis with consideration of individual circumstances and may include full-time or part-time employment that is 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) is in the process of converting all Public Housing stock to Project Based Rental Assistance under RAD. There is currently 1 PH property that has yet to be converted to PBRA at the time of the posting of this Action Plan: Chalmers West. Characteristics of the 87 families living within this public housing family development as of February 21st, 2020, include the following:~~

~~• Family Size – Public Housing~~

- ~~• The average family size is 2.59.~~

~~• Race/Ethnicity of HOH – Public Housing~~

Race:

- ~~• Black: 36, 41.38%~~
- ~~• White: 50, 57.47%~~
- ~~• Asian: 1, 1.15%~~
- ~~• Native American: 0, 0%~~
- ~~• Pacific Islander: 0, 0%~~

Ethnicity:

- ~~• Hispanic: 43, 49.43%~~
- ~~• Non-Hispanic: 44, 50.57%~~

~~• Income – Public Housing~~

- ~~• The average income of a public housing family: \$12,475~~

~~D. Gender of Head of Household – Public Housing~~

- ~~• Females: 64, 73.56%~~
- ~~• Males: 23, 26.44%~~

~~E. Average Age – Head of Household – Public Housing~~

- ~~• _____ 50.33~~

III. FAMILY DEMOGRAPHICS – HOUSING CHOICE VOUCHER PROGRAM

The Housing Authority of the City of Austin manages 5,518-748 vouchers. The FSS Program will serve the following housing choice voucher ~~HCV~~ voucher types that HACA utilizes: tenant-based vouchers, project-based vouchers, family unification program (FUP), foster youth to independence (FUP-Y, FFYI), veteran affairs supportive housing (~~I~~-VASH), and emergency housing vouchers (EHV). Characteristics of the families living within the ~~h~~Housing ~~c~~Choice ~~v~~Voucher ~~p~~Program, as of ~~February-August 21st, 2022~~0 include the following:

A. Family Size Household Composition – Housing Choice Voucher

- ~~• The average family size is: _____ 2.383.3.~~

- Average Age: **51**
- Households with Dependents: **54%**
- Disabled individuals: **28%**

B. Race/Ethnicity (HOH) – Housing Choice Voucher

Race:

- Black/African American: **2,987, 54.13%**
- White: **2,442, 44.26%**
- Asian: **104, 1.88%**
- American Indian/Alaska Native Native American: **59, 1.07%**
- Native Hawaiian/Pacific Islander: **17, 0.310%**

Ethnicity:

- Hispanic or Latino: **1,507, 27.31%**
- Not a Hispanic or Latino: **4,011, 72.6973%**

C. Income – Housing Choice Voucher

1. The average income of a Housing Choice Voucher family is \$15,774480

2. Income Distribution per Household

- \$0 - \$9,999 – **39%**
- \$10,000 - \$19,999 – **34%**
- \$20,000 - \$29,999 – **12%**
- \$30,000 - \$39,999 – **9%**
- \$40,000 - \$49,000 – **4%**
- \$50,000 and above – **2%**

3. Employment Status of Adults:

- Employed: **26%**
- Unemployed: **74%**

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

50.04

XXXIX.IV. FSS PROGRAM PARTICIPANTS ANTICIPATED PARTICIPATION SUPPORTIVE SERVICES NEEDS OF FAMILIES EXPECTED TO PARTICIPATE IN FSS

HACA will make a good faith effort to have the FSS program emulate the demographics of the residents of HACA's ~~Public Housing and~~ Housing Choice Voucher Programs. **The HACA FSS**

Program gathered information about the supportive service needs of HCV participants from completed interest forms for families applying to enter the FSS program waiting list from the year prior to this Action Plan submission. Of the families that completed the interest form, 11% identified job coaching, readiness, and placement an area of need; 19% needed computer skills training; 19% needed a GED or high school diploma; 30% needed a college degree or certificate; 60% requested financial coaching or credit repair assistance; and 85% needed homeownership counseling. Based on supportive services requests from current FSS participants, additional needs of FSS participants are child care assistance, mental health counseling, English as a Second Language courses, and transportation assistance.

~~XL.V.~~ ESTIMATE OF PARTICIPATING FAMILIES

~~A. Public Housing~~

~~HACA will enroll interested public housing residents from the remaining PH property as they end their participation in the Jobs Plus Program. For this new enrollment period, a minimum of 10 slots will be made available for these families and additional families may enroll based on the availability of openings on the FSS Coordinators' caseloads. Enrollment will end prior to the property's conversion to PBRA under RAD.~~

~~B.A. Project Based Rental Assistance~~

HACA will only continue to serve the FSS participants that enrolled in the program prior to conversion from Public Housing to PBRA. At the time of the posting of this Action Plan, there are approximately ~~23~~ 4 families who are still enrolled in FSS under PBRA post-RAD conversion. No new PBRA families will be enrolled and served under this Action Plan.

~~B.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 with a maximum of 65 participants per FSS Coordinator. There are 4 full-time FSS Coordinators on staff that will carry full caseloads. FSS Program Manager serving a caseload of 25 in addition to program management duties. The minimum number of participants required to be served based on the funding received for 5 coordinators is 225. The estimated amount of participants the HACA FSS Program will maintain is 285. Historically, HACA's FSS program has enrolled an average of 64 families into the FSS program each year. Accordingly, HACA expects to provide FSS sServices to approximately 605 families over a five-year period.

C. Other Self-Sufficiency Programs

The FSS Program will make every effort to enroll all interested individuals from the Foster Youth to Independence and Family Unification Program Youth (FYI/FUP-Y) that would like to participate so that they may take advantage of the 24-month maximum extension of their 36-month voucher through the Foster Stable Housing Opportunity (FSHO).

HACA also serves VASH (Veterans Affairs Supportive Housing) and FUP (Family Unification Program) voucher holders. The program goal is for 10% of the HACA FSS Program enrollment to be VASH, FUP, and FYI/FUP-Y participants.

FSS Coordinators serving PH and remaining PBRA families will add HCV families on their caseloads as needed to maintain minimum caseload sizes of 50. The availability of the FSS Waitlist will be posted at the HACA Administrative Offices, on the HACA website, and on social media when the program has capacity to bring on new participants. Recruitment of new families will be ongoing to replace any available openings. Section VIH and ~~VIII~~ of this plan describe outreach and selection procedures. HACA will evaluate its capacity to serve more FSS participants on an ongoing basis.

VIH. 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 ~~the remaining Public Housing property and from~~ the HCV Program will be enrolled onto the FSS program on a rolling basis as determined by availability on FSS Coordinators' caseloads per this FSS Action Plan. ~~Enrollment for the remaining Public Housing Property (Chalmers West) will cease prior to the property's conversion to PBRA.~~

VIII. OUTREACH EFFORTS

HACA will conduct ongoing outreach to ~~Public Housing and~~ HCV households by way of newsletter, flyers, and brochures describing the FSS Program and announcing various FSS events. ~~Public Housing Managers and FSS team will train~~ Housing Choice Voucher Program's Housing Eligibility Specialists about the program so that they may identify potential candidates for the program and will distribute FSS brochures to residents at annual re-examinations and initial orientations. When vouchers are distributed to any Section 8(o) families including HCV, FUP-Y/FYI, and VASH, EHV, Mainstream, and PBV participants, information will be given to the family on the Family Self-Sufficiency Program about the FSS Program as well as marketing materials such as promotional videos. In addition, when the FSS Waitlist is open, FSS Coordinators will notify HCV and Special Programs and VASH staff so that they may notify their

residents of the opportunity, and directly notify FUP-Y and FYI youth and families participants. FSS Coordinators will conduct outreach by mail periodically based on need for participants. This outreach will be comprised of informational letters and emails (when available) sent to each HCV participant by income increments starting with zero income up to the highest income level.

HACA will also conduct FSS promotional activities including workshops/webinars, resident empowerment events, and other such activities that will be advertised on social media, in the Central Office lobby, and on the PHA website. FSS staff will also take any opportunity to discuss the program with HCV participants during service events, phone calls, or emails.

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 efforts will be targeted equally to all families, using materials in 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, HACA will account for the needs of persons with disabilities, including persons with impaired vision, hearing, or mobility, and provide effective communications to ensure that all eligible who wish to participate can do so. Outreach will be made to all HACA families without regard to race, color, religion, sexual identity, sexual orientation, handicap, familial status, age, or national origin.

~~VIII~~. SELECTION PROCEDURES –PUBLIC HOUSING AND HOUSING CHOICE VOUCHER PROGRAM

A. Reasonable Accommodations

A person with disabilities may request reasonable accommodations to facilitate participation in the FSS program.

Requests should be made verbally or in writing to the FSS Coordinator or FSS Program Manager. Requests will be considered on a case-by-case basis. FSS staff will respond to requests in accordance with the agency's reasonable accommodations policy.

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

It is the policy of HACA 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, HACA'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).

~~Selection is made without regard to race, color, religion, sexual identity, sexual orientation, handicap, familial status, national origin, age, or sexual orientation, 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. All written FSS program communications with the HCV population are in English and Spanish and the HACA website that included information on the program also translates to both languages. Interpreters are made available to accommodate language needs. The HACA Central Office lobby is open throughout the week to serve any requests for accommodation as well.~~

~~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 in the staff review meeting 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, HACA will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.~~

C. Application Procedures

1. 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 list will be maintained as a pool of possible participants and ~~maintained~~ managed 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 V.C. for HCV participants.

~~There will be separate waiting lists for the Public Housing and Housing Choice Voucher Program, if a waiting list is deemed necessary. In order to be placed on the waiting list, interested HACA families that are leased with their voucher must complete an electronic or paper FSS Interest Form. and return an FSS Interest Form. The paper form can be acquired from the Central Office Lobby, by mail, or email. The electronic form may also be posted on the HACA website when the FSS waiting list is open. 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) in order of date the FSS Interest Form was submitted, and allowed entry~~

into the FSS Program as space allows on FSS Coordinator caseloads.

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 a preference on the waiting list. ~~priority and may be absorbed into the HCV FSS program without first becoming waitlisted.~~ FSS staff will conduct direct outreach to families porting in via email and/or mail when they are identified by HCV reports or portability staff. Outreach will contain an invitation to enter the waiting list with preference once leased in an assisted unit in HACA's jurisdiction.

FUP-Y or FYI voucher holders participating in FSHO that enables them to extend their voucher to 5 years may also receive an equal preference on the waiting list as porting families. FSS staff will directly outreach to FUP youth and FYI participants by mail and/or email to invite them to enter the waiting list with preference when the list is open.

Since porting families and FUP-Y or FYI voucher holders have the same level of preference, they will be drawn from the waitlist according to the date and time of the FSS Interest Form submission. Fifty percent of the available FSS slots will be reserved for families with a preference on the waiting list.

2. Application:

As openings to the FSS waiting list on the FSS Program caseloads become available, individuals on the waiting list will be contacted via mail and/or email by preference and then 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 the resident fails to do so return the FSS Application Form, be they will be~~ removed from the list and no longer considered ~~edation~~ 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 virtual, phone, or in-person orientation in a virtual setting or in person. 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 appointment (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 (C.1.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~~ ~~The completion of the orientation session serves as is~~ the second motivational screening for level of interest. If at the time of the 2nd rescheduled appointment, the applicant requires more than 30 additional days for intake appointment, they will be placed back on the waitlist.

Each family will be given two opportunities to attend the orientation session and may request 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 translation services, an alternative location, a virtual orientation session, or an environment that accommodates childcare.

IX. PORTABILITY PROVISIONS

HCV families may relocate as a feature of the program and FSS families may end their participation in FSS or transfer their FSS contract to the receiving PHA.

A. Families Porting out of HACA's Jurisdiction:

1. Although HACA is not required to allow FSS participants to exercise portability ~~may be exercised after~~ during the first 12 months from the CoP start date, HACA may allow for portability within this period to the extent feasible. A PHA may approve an FSS family's request to move under portability during the first 12 months.
2. If continued FSS participation is not possible with the receiving PHA, the FSS Coordinator will discuss the options available to the family, which may include modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, or termination with FSS escrow disbursement, or locating an alternative PHA that can enroll the family into its FSS program. The FSS family cannot continue participation in the program with a PHA that does not administer an FSS program. Every effort will be made by the HACA FSS Program to avoid termination and forfeiture of the escrow account funds.
3. If a HACA FSS Participant chooses to move to another jurisdiction and their voucher is being absorbed, the family must provide a signed and revised FSS CoP in order for the transfer of FSS funds to the receiving PHA to occur. If the signed CoP is not received within 90 days of HACA's receipt of notification that the household has leased up in that jurisdiction, then the family's participation in HACA's FSS Program will be terminated

and any escrow monies will be forfeited.

1.4. There will be only one escrow account that will be managed by the PHA that is handling the voucher payments. For example, if an FSS family moves from HACA and the receiving PHA is billing HACA, then the escrow account will be maintained by HACA.

B. Families Porting into HACA's Jurisdiction:

1. All FSS families in good standing that move into HACA's jurisdiction will be served by the program unless:

a. There is no capacity on the program to serve the family because the maximum number of families are already being served.

b. The initial PHA and HACA agree that the family can continue to participate in the initial PHA's FSS program after the move to the new jurisdiction by fulfilling its responsibilities the CoP in HACA's jurisdiction.

2. FSS families porting into HACA's jurisdiction will receive ~~priority entry onto the program and may be absorbed into the HCVa preference on the FSS program without first becoming waitlisted~~ waiting list. The family that is porting into HACA's FSS Program must sign the contract of participation within 90 days of lease-up with HACA. The end date of the CoP will remain the same, but the start date will be the first of the following month after the family signs the new CoP. If the port-in family does not sign HACA's CoP within 90 days, then the initial PHA may terminate their CoP and forfeit the family's escrow.

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 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.

The head of FSS family is an adult member of the household determined by the family. The head of FSS family may or may not be the head of household for purposes of determining income eligibility and rent. All adult members of the household will sign a designation form prior to the signing of the CoP to agree upon the determination of the head of FSS family. The head of FSS family is under the obligations of the CoP and ITSP. The head of FSS family may be changed at any point in the CoP term by completion of a new designation form signed by all adults in the family at that time.

B.A. Individual Training and Service Plan (ITSP)

A member of HACA's FSS team and the head ~~of household~~ of FSS family will collaboratively develop an Individual Training and Service Plan (ITSP), which establishes the family's specific interim and final goals.

1. Needs Assessment:

The ITSP is developed with the family from the initial needs assessment in which the FSS Coordinator works with the participant to gather information on their history and needs around education, employment, finances, life skills, transportation, and legal areas. This needs assessment was developed by the PHA to capture all areas that families may need support to address, while using a strengths-based approach to identify the supports and skills the participant is already utilizing.

2. Goal Development:

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. ITSP goals are prioritized by urgency as determined by the participant and FSS Coordinator. A holistic approach to the needs of the participant will be utilized. Health and safety concerns will be given priority so that additional goals can be accomplished after more urgent needs are addressed.

a. Required Final Goals:

One final 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, by the expiration of the term of the FSS CoP.

A required final goal for every FSS head of family is obtaining suitable employment, which is defined on a case-by-case basis through agreement between the participant and the PHA or owner. Consideration is taken of the impact of an increase in income on benefits such as SSDI, Medicare, Medicaid, etc, that may be in the best interest of the participant to retain rather than increase income beyond eligibility limits.

b. Modification of ITSP:

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~~ The resources needed to meet goals must be accessible and available to the family. -availability and access to resources to meet said goals is within the scope of the family's abilities.- ~~The ITSP may be modified up to the last day of the FSS contract~~ to improve the participant's ability to complete their

obligations in the CoP or progress toward economic self-sufficiency. All modifications must be in writing and signed by HACA staff and the FSS participant. Any adult family member may choose to create an ITSP with the FSS Coordinator and receive the support of the program for goal completion.

3. Transitional supportive service assistance.

Assistance and referrals will not be available to families who have completed their CoP contracts, as time spent on these referrals will not be covered by funds designated by HUD to support the FSS program.

D.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 meetings with frequency determined by FSS Coordinator and agreed upon by FSS participant;
- 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~~ at the 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:

Contact FSS participant regularly based on assessed need (monthly to semi-annually) to determine progress made toward defined goals via progress reviews by personal interviews, phone contact, in-person, or virtual meetings, in addition to contacts made by email, phone, and/or group meetings. Coordinator will offer more frequent meetings with participants that are in need of increased assistance to progress with their goals.

1) :

- 2)1) 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 (from HCV only);
- 3)2) Maintain a contact record documenting tasks and accomplishments made towards achieving goals for all FSS participants;
- 4)3) Conduct regularly scheduled orientations for interested potential new participants;
- 5)4) Provide referrals and supportive services (as defined in Section XI.A) available to FSS families; and
- 6)5) 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:

<u>Supportive Service Category</u>	<u>Specific Service</u>	<u>Source/Partner</u>
<u>Assessment</u>	<u>Vocational Assessment & Disability Assessment</u>	<u>Capital Area Workforce Solutions, Texas Workforce Solutions Vocational Rehabilitation Services</u>
<u>Childcare</u>	<u>Infant/Preschool Care & Afterschool Care</u>	<u>Workforce Solutions Capital Area Childcare Services; Austin Pathways</u>
<u>Transportation</u>	<ul style="list-style-type: none"> ▪ <u>Bus Passes</u> ▪ <u>Car Repair and Car Purchase</u> 	<ul style="list-style-type: none"> ▪ <u>Capital Metro Discounted Bus Pass Program</u> ▪ <u>Austin Pathways</u>
<u>Education</u>	<ul style="list-style-type: none"> ▪ <u>High School Diploma/GED</u> ▪ <u>ESL</u> ▪ <u>Post-Secondary Certificates</u> ▪ <u>Advanced Degrees</u> 	<ul style="list-style-type: none"> ▪ <u>Goodwill Excel Center, Austin Community College (ACC)</u> ▪ <u>Casa Marianella, ACC, The Literacy Coalition of Central Texas</u> ▪ <u>Skillpoint Alliance, Austin Pathways</u> ▪ <u>ACC, Capital IDEA, PelotonU, Austin Pathways</u>
<u>Skills Training</u>	<ul style="list-style-type: none"> ▪ <u>Basic Skills Training</u> ▪ <u>Technology and Healthcare Training</u> 	<ul style="list-style-type: none"> ▪ <u>The Literacy Coalition of Central Texas, Lifeworks, el Buen</u>

	<ul style="list-style-type: none"> ▪ <u>Apprenticeships</u> ▪ <u>Skilled Labor Training</u> 	<u>Samaritano, Manos de Cristo, Austin FreeNet</u> <ul style="list-style-type: none"> ▪ <u>Capital Area Workforce Solutions, Capital IDEA,</u> ▪ <u>Skillpoint Alliance</u> ▪ <u>ACC including available partnerships with area corporations</u>
<u>Job Readiness</u>	<ul style="list-style-type: none"> ▪ <u>Resume preparation, interviewing skills, job placement</u> ▪ <u>Work clothes and equipment</u> 	<ul style="list-style-type: none"> ▪ <u>Goodwill Central Texas, Austin Area Urban League, African American Youth Harvest Foundation</u> ▪ <u>Dress for Success, Austin Pathways</u>
<u>Small Business Development</u>	<u>Small Business Coaching & Entrepreneurial Training</u>	<u>Economic Growth Business Incubator, BiG Austin, SCORE, Foundation Communities</u>
<u>Health/Mental Health Care</u>	<ul style="list-style-type: none"> ▪ <u>Dental Services</u> ▪ <u>Mental Health Services</u> ▪ <u>Health Insurance Counseling</u> 	<ul style="list-style-type: none"> ▪ <u>Manos de Cristo</u> ▪ <u>Lifeworks, Capital Area Counseling, Integral Care</u> ▪ <u>Foundation Communities</u>
<u>Homeownership Preparation</u>	<ul style="list-style-type: none"> ▪ <u>Homeownership Education & Housing Counseling</u> ▪ <u>Downpayment Assistance</u> 	<ul style="list-style-type: none"> ▪ <u>Frameworks CDC, Habitat for Humanity</u> ▪ <u>City of Austin Housing & Planning Department, Texas Department of Housing and Community Affairs Texas Homebuyer Program</u>
<u>Financial Education</u>	<u>Financial coaching and courses Credit Counseling</u>	<u>Foundation Communities, Frost Bank</u>
<u>Legal Services</u>	<u>Legal Services</u>	<u>Texas RioGrande Legal Aid, Lawyer Referral Service of Central Texas, University of Texas Pro Bono Program</u>

- ~~1) Childcare~~
- ~~1) Transportation~~
- ~~1) Life Skills Training~~
- ~~1) Education~~
- ~~1) Employment Opportunities and Job Training~~
- ~~1) Financial Literacy~~
- ~~1) Home Ownership Training~~
- ~~1) 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. Supportive services may include but are not limited to: bus passes; gas cards; certification programs; testing for licensing and certification; work and school uniforms/equipment; and transitional childcare. —This supplementary support is based on the evaluated need of FSS participants and the impact on the family’s successful completion of their program goals. Support 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. If a family presents a need for financial assistance, funds will be utilized in the following order dependent on availability: Supportive Services funds, forfeited escrow funds, and escrow account funds.

E.C. —Escrow Account

Families participating in the FSS Program may, if eligible, accumulate money in an escrow account when their earned income increases. The baseline income is set from the most recent certification at the time of contract execution. 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 end date of the Contract of Participation is set at 5 years after the first recertification after the contract start date per the FSS Final Rule. This allows for 5 potential years of escrow savings.

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. The escrow credit is no longer reduced for families that are above the very-low income limit; potentially capped due to payment of flat rent for Public Housing families or 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. For Mod Rehab and PBRA families, escrow is calculated as the difference between the baseline monthly rent and the current gross rent. The property management company or those completing PBRA certifications must communicate and cooperate with the FSS Program for the purposes of escrow calculation and program participation.

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

a) Final 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:

~~0) 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~~ **FSS head of family** 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.

~~2) 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.~~ **The FSS head of family has completed all goals on ITSP and obtained suitable employment as determined by FSS Coordinator on a case-by-case basis in consultation with the family. Goal completion is verified by documentation from 3rd party sources when possible. Tenant provided documentation is accepted when this option is not available.**

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

b) Interim Disbursements

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-FSS family~~ and follow the proper HACA Standard Operating Procedures, which is subject to approval.

Examples of potentially eligible requests include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, and transportation needs for education or employment.

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. Partial disbursement of escrow funds will be allowed up to two times per calendar year and must be limited to goal specific requests, provided that the total of the requests is equal to or less than 50% of the escrow balance at the time of the first request.

The FSS Program Manager will review all requests for interim disbursements and will ~~make a recommendations~~ submit approved requests to the Vice President of Assisted Housing, the CFO, and the ~~The President and~~ CEO or COO ~~shall retain for~~ 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.~~

c) Disbursement with Termination of CoP

Escrow funds will be disbursed when CoP is terminated under the following conditions:

1. Services that HACA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable; or
2. The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless HACA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family; or
3. An FSS family in good standing moves outside the jurisdiction of the PHA under portability for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

3. Forfeited Escrow Funds

FSS escrow account funds forfeited by the FSS family must be used by the PHA or owner for the benefit of the FSS participants and/or household. Specifically, such funds may be used for the following eligible activities:

- a) Support for FSS participants in good standing, including, but not limited to, transportation, child care, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP;

b) Training for FSS Program Coordinator(s); or

c) Other eligible activities as determined by the Secretary.

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 the Secretary.

Forfeited escrow fund requests may be made throughout the term of the CoP. Requests must be made in writing by the head of FSS family or other family members as needed. The determination of whether the family qualifies for the requested disbursement will be made on a case-by-case basis by the FSS Manager and Executive staff of HACA. Forfeited escrow fund requests will be reviewed by the FSS Program Manager and submitted for the approval of the Vice President of Assisted Housing, the CFO, and the CEO or COO.

Requests for FSS coordinator training will be approved by the Vice President of Assisted Housing CEO or COO pending availability of funds.

Payments will be made directly to the vendor when possible.

4. 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 have their full earned income, even if excluded under EID, included in the baseline of the CoP. be excluded from the aggregate of earned income for the purposes of calculating escrow.~~

~~To this end, FSS Participants eligible for EID will not earn escrow until the rent paid exceeds their baseline. 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. FSS participants that were enrolled in FSS prior to the implementation of the FSS Final Rule effective 6/16/2022~~

will not have their baselines reset if and when they convert to the new CoP and regulations under the Final Rule.

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 FSS head of ~~household-family~~ fail to fulfill the Family's Responsibilities as defined in Section XI, 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 as determined and agreed upon by the family. 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. FSS Coordinator will attempt to reach the participant via phone, text, and/or email prior to contract termination due to non-compliance with family obligations to request required activity, meeting, or correspondence. The FSS Coordinator will provide a 14 day written warning of termination to the FSS participant and if no response is received, then the participant will be processed for termination.

XIII.V. 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. The following are considered participant breaches of the CoP:

- a. Failure to provide communication to coordinator regarding progress on ITSP goals via meeting attendance, phone calls, and/or emails after written notification of non-compliance
 - b. Failure to actively pursue activities and/or goals on the ITSP, including employment activities
 - c. Failure to complete ITSP activities and/or goals within the specified time frames
 - d. An “act inconsistent with the purposes of FSS” may be defined as threatening, fraudulent, or overtly hostile behavior that prevents the successful functioning of the service coordination relationship. A written warning will be given if such an act occurs and if there is any additional occurrences, then the participant may be terminated from the program at the discretion of the PHA.
- .
- 4) If the ~~FSS head of FSS~~ family’s ~~head of household~~ fails to become independent from welfare assistance;
 - 5) If the ~~FSS family’s head of household~~ head of FSS family 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.

The FSS coordinator will mail and email (when available) the termination notice ~~temail if possible~~ to the participant. The notice will include the following: the effective date of the termination, reason for termination, a statement informing the family of their right to request an informal hearing and the deadline for the request, a statement informing the family that termination from the FSS program does not impact their housing assistance, and the amount of escrow being forfeited with termination.

B. Re-enrollment of Terminated Participants

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.

If a participant is terminated with escrow disbursement, they may not re-enroll in HACA’s FSS program.

HACA may use discretion in determining eligibility for return to the program ~~in~~with 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.

The above provisions do not apply to family members who were not heads of FSS family during previous enrollment. Family members who were not heads of FSS family previously will be treated as new applicants to the program.

XIV. 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 written request for an informal hearing must be made within 15 business days of the date of the FSS termination letter. The appeal procedures for FSS can be obtained through the FSS Program Manager or the Informal Hearing Officer.

The persons included in the informal hearing will be the head of FSS family, the FSS Coordinator and/or FSS Program Manager, and the HACA staff serving as the Informal Hearing Officer.

The appeal hearing notification with the date, time, and location of the hearing will be sent made by mail and/or email within 30 days of the family's request. Appeal hearings may be conducted virtually or in person at HACA's offices. The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made verbally or in writing within forty-eight hours prior to the hearing date. If the participant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact HACA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The Hearing Officer will reschedule the hearing only if the participant can show good cause for the failure to appear or if needed as a reasonable accommodation for a person with disabilities.

At their own expense, the family may be represented by a lawyer or other representative at the informal hearing.

The hearing officer will issue a written decision to the family within 10 business days after the hearing. Informal hearing decisions for FSS program actions are final.

No appeal will be granted for voluntary withdrawal.

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

A. - ~~Public Housing, Project Based Rental Assistance, and Housing Choice Voucher Program~~ Contract Term

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~~ by the contract end date, 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. Contract end date is set as 5 years from the first recertification after the CoP start date.

B. Extension

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. HACA retains the sole discretion to grant or deny an extension request. Requests for extension may be granted for the following reasons:

- ~~1. Requests for an extension shall not be approved unless~~ Ceircumstances beyond the control of the FSS family that impede the family's ability to complete the CoP obligations, as determined by HACA, such as a serious illness or involuntary loss of employment, 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.
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 HACA;
- ~~1.3.~~ Any other circumstance that HACA determines warrants an extension, as long as HACA is consistent in its determination as to which circumstances warrant an extension.

C. ~~3~~ Modification

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 FSS family. Modifications to the Individual Training and Service Plan may be made ~~no later than 30 days prior to the~~ up to the expiration date of the FSS Contract of Participation.

D. Additional Terms

A participant may only graduate one time from ~~either the Public Housing / PBRA or the Housing Choice Voucher HACA's~~ FSS program. The only exception to this guideline is ~~an HCVa~~ 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.

Family members who were not heads of FSS family previously may re-enroll in HACA's FSS program.

XVI. 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 into HACA's assistance programs encumbered in any way. 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.

~~should they wish not to participate.~~

XXI.XVII. 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.

XXH.XVIII. 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
- AUSTIN AREA URBAN LEAGUE – assessment, work readiness training, certificate training and job placement.
- 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~~HOUSING & PLANNING DEPARTMENT – down payment assistance program; affordable housing program
- GOODWILL INDUSTRIES – job placement services; interviewing skills; resume writing, financial literacy and life skills training
- AREA CHURCHES – 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 or added to the PCC at the sole discretion of HACA. The PCC ~~will must also include representatives required at least one resident participant per the CFR - two FSS participants from each HUD-assisted program (HCV, PBRA), as well as a minimum of one FSS Coordinator, one from each PH and HCV FSS Programs. A PCC is not required for PBRA FSS; however, Remaining~~ PBRA residents will be included and served by HACA’s PCC. The PCC will meet on a quarterly basis in a virtual or in-person setting.

XXIII.XIX. FSS COORDINATOR FUNDING

FSS Coordinators will be funded through the FSS NOFA to serve HCV, ~~PH,~~ and PBRA residents that were already enrolled in FSS prior to conversion through RAD. The Housing Authority will maintain enrollment of HCV residents in the FSS Program to ~~maintain-retain~~ eligibility to apply for FSS Coordinator funding under the FSS NOFA to serve eligible residents.

XXIV.XX. 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 programs under title I of the Workforce Innovation and Opportunity Act 29 U.S.C. 3111 et seq. and with other employment, child care, transportation, training, education, and financial empowerment programs in the 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: 8/15/22