



HOUSTON

HOUSING AUTHORITY

REVISED

Family Self-Sufficiency Action Plan

Effective Date: November 15, 2022

Table of Contents

| | | |
|-------|---|----|
| I. | INTRODUCTION | 1 |
| II. | PROGRAM OBJECTIVES | 1 |
| III. | PROGRAM CHARACTERISTICS | 1 |
| IV. | SUPPORTIVE SERVICES NEEDS OF FAMILIES EXPECTED TO PARTICIPATE IN FSS .. | 1 |
| V. | ESTIMATE OF PARTICIPATING FAMILIES | 2 |
| VI. | OTHER SELF-SUFFICIENCY PROGRAMS | 2 |
| VII. | FSS FAMILY SELECTION PROCEDURES | 3 |
| | a. Waiting List..... | 3 |
| | b. Selection Preference | 3 |
| | c. Screening for Motivation..... | 3 |
| | d. Compliance with Non-Discrimination Policies | 4 |
| VIII. | RE-ENROLLMENT OF PRIOR FSS PARTICIPANTS..... | 4 |
| IX. | HEAD OF FSS FAMILY | 4 |
| X. | OUTREACH | 5 |
| XI. | FSS ESCROW ACCOUNT | 6 |
| | a) Escrow Calculation | 6 |
| | b) Reporting on the FSS Escrow Account..... | 6 |
| | c) Interim Escrow Disbursements | 6 |
| | d) Forfeited Escrow Funds | 7 |
| XII. | INCENTIVES | 8 |
| XIII. | FAMILY ACTIVITIES & SUPPORTIVE SERVICES..... | 8 |
| | a. Identifying Family Support Needs | 10 |
| | b. Delivering Appropriate Services..... | 10 |
| | c. Transitional Supportive Service Assistance | 10 |
| XIV. | FSS CONTRACT OF PARTICIPATION (COP) | 11 |
| | a. ITSP Goals..... | 11 |
| | b. Determination of Suitable Employment..... | 11 |
| | c. Contract of Participation Term and Extensions..... | 11 |
| | d. Completion of the Contract | 12 |
| | e. Documentation of Goal Completion | 12 |
| | f. Modification to the CoP | 13 |
| | g. Consequences of Non-Compliance with the CoP | 13 |
| | h. Change in Family Composition During the Term of the COP | 13 |
| XV. | PROGRAM TERMINATION AND AVAILABLE GRIEVANCE PROCEDURES | 14 |
| | a. Involuntary Termination | 14 |
| | b. Voluntary Termination | 15 |

| | |
|---|-----------|
| c. Termination with Escrow Disbursement | 15 |
| d. Grievance and Hearing Procedures | 15 |
| XVI. VOLUNTARY PROGRAM – ASSURANCE OF NON-INTERFERENCE..... | 15 |
| XVII. TIMETABLE FOR PROGRAM IMPLEMENTATION | 15 |
| XVIII. REASONABLE ACCOMMODATIONS & LIMITED ENGLISH PROFICIENCY | 16 |
| XIX. COORDINATION OF SERVICES..... | 16 |
| a. Certification of Coordination | 16 |
| b. Program Coordinating Committee | 16 |
| XX. FSS PORTABILITY..... | 17 |
| a. Moves into HHA’s Jurisdiction | 17 |
| b. FSS Termination with Escrow Disbursement for Porting Families..... | 17 |
| APPENDIX A: HHA DEMOGRAPHIC DATA | 18 |

I. INTRODUCTION

This action plan constitutes program policies the Houston Housing Authority (HHA) will execute for its Family Self Sufficiency (FSS) Program.

The purpose of the FSS Action Plan is to establish policies and procedures for carrying out the FSS program in a manner consistent with HUD requirements and local objectives. HHA's FSS program serves families participating in Public Housing (PH) and the Housing Choice Voucher (HCV) programs. As HHA has been designated a Moving to Work (MTW) agency, HHA, may update this Action Plan to reflect HUD approved MTW FSS enhancements.

This FSS Action Plan describes HHA's local policies for operation of the FSS program in the context of federal laws and regulations. The FSS program will be operated in accordance with applicable laws, regulations, HHA's FSS policies, notices and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.

The FSS program and the functions and responsibilities of HHA staff are consistent with HHA's personnel policy and Annual Plan.

II. PROGRAM OBJECTIVES

HHA's FSS program seeks to help families make progress toward economic security by supporting the family's efforts to:

- Increase their earned income
- Build financial capability
- Achieve their financial goals

III. PROGRAM CHARACTERISTICS

See Appendix A which includes HHA's family demographics.

IV. SUPPORTIVE SERVICES NEEDS OF FAMILIES EXPECTED TO PARTICIPATE IN FSS

The partnership between HHA and other agencies and programs serving FSS clients is built on close collaboration and coordination. To facilitate these efforts, HHA senior management cultivates contacts with providers serving FSS clients to provide continuity of care and coherent direction and support. FSS program staff identifies community resources that will provide services to clients, while the FSS program offers case management and coordination of services to supplement the capacities of other agencies and help them achieve shared institutional and community goals.

HHA has identified local and regional supportive service providers who will assist FSS families' progress. These resources include, but are not limited to, the following:

- Workforce Development (Career counseling, job development and placement)
- Childcare including after school and summer programming for school-age children
- Education and/or Job Training
- Entrepreneurial training
- Homeownership
- Transportation
- Adult Literacy (GED & ESL)
- Financial Literacy
- Supportive Services (food, substance/alcohol support, physical/mental health service providers, etc)

HHA will continue to develop partnerships and/or relationships with critical service providers in order to facilitate access to services as needed. These partnerships will advance the FSS philosophy and broader aims of HHA's assisted housing programs. This list is based on experience with past FSS or other supportive service program participants and input from other service provider partners.

V. ESTIMATE OF PARTICIPATING FAMILIES

HHA shall serve individuals/families who express interest in participating in the FSS Program. The number of spaces available in the program will be based on the program's resources, including the number of FSS coordinators funded to serve participants. New families will be admitted to the FSS program, as space permits.

In recent years, HHA has been funded for 7 coordinators to serve a minimum program size of 375 participants. Historically, HHA strive to enroll an average of 25 new families annually. All participants will be provided high-quality services with each FSS Coordinator's caseload being a minimum of 53 participants (Ratio 1:53).

VI. OTHER SELF-SUFFICIENCY PROGRAMS

In addition to the FSS program, HHA offers families a broad array of programs in order to meet families' diverse needs. Services and supports are provided through partnerships with other non-profit organizations and government agencies. HHA will coordinate referrals and outreach with its partners to ensure that families participating in other HHA programs will have the opportunity to participate in the FSS program.

HHA expects to enroll families from the following programs into FSS:

| Affordable Housing Programs | # of New Enrollment Targets/Annually |
|------------------------------|--------------------------------------|
| ROSS Service Coordinator | 5 |
| ROSS Job Plus Program | 5 |
| Moving To Work (Rent Reform) | 15 |
| TOTAL | 25 |

VII. FSS FAMILY SELECTION PROCEDURES

a. Waiting List

A waiting list will be maintained for families whose applications cannot be accepted at the time of initial application due to program capacity limits. The waiting list will include the name and contact information for the head of household of the applicant family, the date of their application.

FSS participants will be selected on a first-come, first-served basis from the pool of active participants. Families will always be selected in a nondiscriminatory manner without regard to race, color, religion, gender, family status, national origin, sexual orientation, or handicap.

Any participant who expresses an interest will be afforded the chance to participate in the FSS program. If at some point the availability of FSS slots becomes limited, a waitlist will be established and applicants will be selected by date and time of application.

b. Selection Preference

Eligible participants are enrolled on a first-come, first-served basis, dictated by their date and time of application. Accordingly, HHA has not adopted any selection preferences for FSS.

c. Screening for Motivation

HHA may use a prospective participant's motivation as a factor when determining if the participant is a suitable candidate for the program. In addition, HHA will require prospective participants to attend an orientation before enrolling in the program, either in person, virtually, over the phone, or through a self-paced digital enrollment tool. Examples of motivational screening tasks which HHA may use are outlined below.

- Attendance at FSS orientation session or pre-enrollment interviews;
- Completion of certain tasks that indicate the family's willingness to undertake the FSS contract obligations such as contacting a job training program or contacting an educational program

Where needed, HHA will assist prospective participants in mitigating barriers, such as transportation, language assistance and/or childcare, to allow them to attend the orientation.

d. Compliance with Non-Discrimination Policies

HHA complies 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, HHA's FSS staff and applicable sub-contractors 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.

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). At all times, HHA will select families for participation in the FSS program in accordance with FSS Regulations, HHA policies and applicable HUD guidelines.

VIII. RE-ENROLLMENT OF PRIOR FSS PARTICIPANTS

Participants may enroll in FSS more than once; however, HHA may refuse to reenroll a family in the FSS program if that family previously participated and did not meet its FSS obligations and was terminated from the FSS program.

IX. HEAD OF FSS FAMILY

The head of the FSS family is designated by the participating family. HHA may make itself available to consult with families on this decision but it is the assisted household that chooses the head of FSS family that is most suitable for their individual household circumstances. The designation or any changes by the household to the Head of FSS Family must be submitted to HHA in writing. Both the Head of Household and Head of FSS Family will sign a form stating that they have approved this designation prior to the CoP effective date.

- The Head of FSS Family is the individual who will complete and sign the CoP.
- The Head of FSS Family will be responsible for meeting the goals set in the ITSP and for all other responsibilities as defined in the CoP and the ITSP associated with the FSS Program, including finding and maintaining suitable employment.
- The Head of FSS Family will receive the escrow check at graduation.

X. OUTREACH

HHA's outreach efforts ensure that families participating in applicable HHA programs are offered the opportunity to enroll in the FSS program. HHA will evaluate data on PH and HCV families to identify any underserved areas and develop a focused outreach plan to recruit families residing in underserved areas. Additionally, HHA will address barriers to recruitment more broadly, including ensuring that program materials comply with the requirements set forth in HHA's Language Access Plan.

HHA will work in close coordination with applicable program staff to recruit eligible families and provide FSS program information at important junctures during a family's participation in assisted housing:

- At admission during HCV voucher briefings and PH move-in briefings.
- At regular recertification when income and rent information is updated for the family.
- At events and fairs hosted by HHA, HHA Community Partners and/or FSS Program Coordinating Council members.

HHA will also conduct regular outreach to eligible families through:

- Mass mailings to applicable families via postal service or multi-messaging services
- Flyers included in the briefing packets and/or other HHA program information
- Various community meetings to discuss the program and its benefits
- Direct referrals from PH Property Managers, HHA staff and/or HCV program staff

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

- Program overview
- Program benefits
- Available resources
- Participant responsibilities
- Program outcomes

FSS Coordinators present program information to community coalition and town meetings as well as government organizations and agencies. Additional briefings occur through active involvement with PCC members, which are geographically grouped associations of various social service organizations such as non-profit providers of services to people with mental illnesses and developmental disabilities, area colleges and universities, child care agencies, and other social service agencies.

FSS program information is provided to faith-based and affordable housing partners in minority communities, as a method to both recruit FSS members and keep the public informed on program efforts to improve the lives of clients and hence the communities in which they live.

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

XI. FSS ESCROW ACCOUNT

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account, as well as any additional incentives offered by HHA are described below.

Upon HUD approval, of HHA's FSS Action Plan, HHA will adopt the new escrow model as promulgated by the FSS Final June 2022 Final Rule. New FSS participants will be subject to the final rule escrow calculation; however, existing FSS participants may choose to retain the existing escrow model or sign a new CoP which reflects the new escrow model. Current participants who opt to sign the modified CoP will retain all accrued escrow; however, the monthly escrow credit will be calculated according to the revised escrow model going forward.

a) Escrow Calculation

FSS participants will be eligible to build savings from the FSS escrow account. While HHA's FSS program does not provide any other financial incentives for FSS participants, however, referrals will be provided for financial coaching and literacy as a valuable service.

b) Reporting on the FSS Escrow Account

HHA and its partners will provide written escrow statements to each FSS family bi-annually which will include the opening and ending balances for the year, monthly escrow credit amount, withdrawals and accrual of interest earned during the reporting period.

c) Interim Escrow Disbursements

HHA will allow for interim disbursements on a case by case basis: Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP). Requests for interim disbursement must be made in writing. Requests may be made through the term of the Contract of Participation. Examples of potentially eligible activities supporting an Interim Escrow Disbursement are but not limited to:

- a) Payments for post-secondary education (of grants/scholarships are unavailable)
- b) Job training Tuition and/or Supplies (of grants/scholarships are unavailable)
- c) Small business start-up costs (For FSS Participants)
- d) Automobile Repairs for Vehicles in FSS Participant's Name

A determination of whether the family qualifies for the requested interim disbursement will be made on a case-by-case basis by the FSS Coordinator and an HHA administrative staff representative. The FSS coordinator will first explore options for services and in-kind donations from partners, which must be exhausted before a request for an interim disbursement will be approved.

d) Forfeited Escrow Funds

Amounts in the FSS account will be forfeited if:

- The CoP is terminated; or
- The CoP is completed; however, the FSS head of household has not sought and maintained suitable employment.

If the head of the family dies and the remaining members of the family choose not to continue participating in the program and the contract obligations have not been met, the escrow funds would be forfeited.

If families do not pay their rent to the HCV property owner or HHA, escrow funds may be forfeited because:

- Compliance with the applicable lease is a family obligation under the contract;
- Non-payment of rent is grounds for terminating a family's participation in FSS (and the HCV & PH programs) and forfeiture of the escrow.

FSS escrow account funds forfeited by the FSS family may be used by HHA for the benefit of the FSS program. Any such use of forfeited funds is based upon availability of forfeited funds. Forfeited funds may be used in lieu of certain interim disbursements. Specifically, forfeited funds may be used for the following purposes:

- a) FSS program incentives or meeting expenses;
- b) FSS Promotional Supplies & Resources
- c) Support for FSS participants in good standing, including, but not limited to, transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP;
- d) Training for FSS Program Coordinator(s); or
- e) Other eligible activities as approved by HUD in HHA's MTW Plan.

XII. INCENTIVES

HHA utilizes a number of incentives to encourage participation and foster completion of goals. The incentives employed by HHA are outlined below:

- **Role Models** - An important aspect of the values governing the FSS program is that successful program participants and graduates serve the program through mentoring, peer counseling and other activities. Recognition as role models bestows tribute to the achievements of each client while the role model provides invaluable services at graduation, promotional events and recruitment sessions.
- **Rewards** - One motivational tool in development involves recognizing significant interim achievements. Participants who have reached major goals such as obtaining a GED, getting a job or a promotion or completing a training program will be invited to attend graduation ceremonies for recognition with award of a certificate.
- **Establishment of FSS Escrow Accounts** - The FSS escrow account provides a financial incentive for participating families to increase their earnings. The FSS escrow account also provides a unique opportunity for FSS participants to build substantial savings.
- **Graduation Celebrations** - Graduation celebrations shall be held to recognize graduates' achievement of self-sufficiency goals. This is where the "service delivery system" of the FSS program comes full circle and the staff truly benefits from the generosity of spirit of the FSS graduate.

XIII. FAMILY ACTIVITIES & SUPPORTIVE SERVICES

Families participating in the FSS program will benefit from coaching that helps them identify and achieve selected goals. Drawing on partners on the Program Coordinating Committee and relationships with other service providers, Coaches will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals.

| Supportive Service Category | Supportive Service | Source/Partners |
|------------------------------------|--|---|
| Financial Empowerment | <ul style="list-style-type: none">• Financial education• Financial coaching• Banking services• Training in money management | The Alliance Capital One HFEC/Alliance Covenant Community Capital MAM Houston Easter Seals |
| Individual Development Accounts | <ul style="list-style-type: none">• Matched Savings Accounts | Covenant Community Capital |

| Supportive Service Category | Supportive Service | Source/Partners |
|------------------------------------|--|--|
| Debt Resolution & Credit Repair | <ul style="list-style-type: none"> Assistance negotiating the resolution of past-due debt | Covenant Community Capital MAM Houston Easter Seals The Alliance |
| Homeownership Preparation | <ul style="list-style-type: none"> Homeownership Education Housing Counseling Down payment Assistance Other Homeownership Assistance | Private/Public Lenders The Alliance Covenant Community Capital |
| Legal Services | <ul style="list-style-type: none"> Legal Services | Legal Aide |
| Child Care | <ul style="list-style-type: none"> Infant Care / Toddler Care Preschool Care Afterschool Care Youth Services Summer Camp | Workforce Solutions/NCI YMCA of Greater Houston Boys & Girls Club Headstart |
| Transportation | <ul style="list-style-type: none"> Bus passes | Metro |
| Education | <ul style="list-style-type: none"> Adult Literacy English as a Second Language Post-secondary certificates | Workforce Solutions Houston Community College SER Jobs for Progress |
| Skills Training | <ul style="list-style-type: none"> Basic Skills Training Apprenticeship HHA Section 3 Program On-the-Job Training | Workforce Solutions SER Jobs Progress |
| Job Search Assistance | <ul style="list-style-type: none"> Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement | Workforce Solutions SER Jobs for Progress Work Faith Conn Alliance |
| Business Development | <ul style="list-style-type: none"> Small business development Small business Mentoring Entrepreneurship Training | Small Business Association SCORE Houston The Alliance |
| Health Insurance Advising | <ul style="list-style-type: none"> Alcohol and Drug Abuse Prevention/Treatment Primary care Dental services Mental Health Services | Legacy Clinic MHMRA Harris Health System United Health Care |
| Crisis Services | <ul style="list-style-type: none"> Crisis Assessment Crisis Intervention | N/A |

| Supportive Service Category | Supportive Service | Source/Partners |
|-----------------------------|--|-----------------|
| | <ul style="list-style-type: none"> • Crisis Management • Crisis Resolution | |
| Other (list) | | |

a. Identifying Family Support Needs

To help determine the supportive services needs of each family, the FSS coordinator will work with the family to complete an initial informal needs assessment for that family before completion of the initial Individual Training Service Plan (ITSP) and signing of the contract of participation. After enrollment in the FSS program, the FSS Coordinator may make referrals to partner agencies for completion of one or more formal needs assessments. These assessments may focus on such issues as: employment readiness and employment training needs, educational needs related to secondary and post-secondary education, financial health, and other topics, depending on the needs and interests of the family.

The formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.

b. Delivering Appropriate Services

Participating families will be assigned an FSS Coordinator who will provide coaching services to help each participating family to:

- Understand the benefits of participating in the FSS program and how the program can help the family achieve its goals.
- Identify achievable, but challenging interim and final goals for participation in the FSS program, break down the goals into achievable steps and accompany the family through the process.
- Identify existing family strengths and skills.
- Understand the needs that the family has for services and supports that may help the family make progress toward their goals.
- Access services available in the community through referral to appropriate service providers
- Overcome obstacles in the way of achieving a family's goals.

c. Transitional Supportive Service Assistance

Families that have completed their CoP and remain in assisted housing may request assistance with referrals to service providers in order to continue their progress toward economic security; subject to availability of HHA's staff.

XIV. FSS CONTRACT OF PARTICIPATION (COP)

The CoP, which will incorporate one ITSP for each participating member of the family, sets forth the principal terms and conditions governing participation in the FSS program. These include the rights and responsibilities of the FSS family and of HHA, the services to be provided to, and the activities to be completed by, each adult member of the FSS family who elects to participate in the program.

Each individual's ITSP will establish specific interim and final goals by which HHA and the family will measure the family's progress towards fulfilling its obligations under the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

a. ITSP Goals

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

b. Determination of Suitable Employment

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

c. Contract of Participation Term and Extensions

The CoP will go into effect on the first day of the month following the execution of the CoP. The initial term of the CoP will run the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. Families may request up to two

one-year extensions and are required to submit a written request that documents the need for the extension. HHA will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

- Circumstances beyond the control of the FSS family, as determined by HHA, such as a serious illness or involuntary loss of employment;
- Active pursuit of a current or additional goal that will result in 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 HHA.

During an extension to the contract, the family continues to have FSS amounts credited to the escrow account.

d. Completion of the Contract

The CoP is completed, and a family's participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members' ITSPs, on or before the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed.

The contract may be completed before the five years have expired. The family does not have to be free of housing assistance to have completed the contract.

e. Documentation of Goal Completion

HHA will request documents to validate completion of agreed upon goals. Such documentation may include but is not limited to the documentation below. HHA may require a combination of self-certification and third-party verification to document completion of ITSP goals.

- Employment: Letter from the employer, paystubs
- Education: Letter from the institution, original transcript, diploma or certificate of completion
- Welfare Assistance: Certification from the participant (only if attempts to contact the welfare agency have failed), benefit statement indicating \$0 benefits, letter from the welfare agency
- Finance: Updated credit score, certificate of completion of classes, bank account statements
- Homeownership: Approved mortgage, HUD Settlement Statement, letter from the financial institution

f. Modification to the CoP

HHA and the FSS family may mutually agree to modify the CoP with respect to the ITSP and/or the contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by HHA as well as the Head of FSS family. The FSS family may not modify the CoP with respect to the ITSP and/or the contract term within 365 days from the end of the contract term.

HHA will allow for modifications to the CoP under the following circumstances:

- When the modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency
- When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, after consultation with HHA, designate another family member to be the FSS head of family
- When a relocating family is entering the FSS program of a receiving HHA and the start date of the CoP must be changed to reflect the date the new CoP is signed with the receiving HHA.

g. Consequences of Non-Compliance with the CoP

Participant non-compliance with the CoP may result in termination from the FSS program. See policies Program Termination.

h. Change in Family Composition During the Term of the CoP

If the Head of FSS Family leaves the household during the term of the contract, and the remaining family members want to continue participation in the FSS program, a remaining family member of the FSS family shall have the right to take over the CoP. The contract will be revised to reflect the new Head of FSS family.

If any family member with an ITSP leaves the assisted family during the term of the FSS contract, HHA will delete the ITSP for that family member. HHA will determine whether new or revised ITSPs need to be established for the family to continue its participation in the FSS program.

If the initially-designated Head of FSS family or any other family member with an ITSP did not meet the obligations under the contract, the HHA may terminate the FSS contract.

XV. PROGRAM TERMINATION AND AVAILABLE GRIEVANCE PROCEDURES

At every stage in the program, HHA and its partners will work with participants to address the challenges and barriers that might inhibit their continued participation and graduation from the program.

a. Involuntary Termination

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

- If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan and related documentation. Non-compliance includes:
 - Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
 - Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities
 - Failure to complete activities and/or goals within the specified time frames; and/or
- If the participant's housing assistance has been terminated.
- Services are unavailable, according to HUD's regulations.
- The participant becomes permanently disabled and unable to work during the period of the contract, and no other household member can assume the CoP.
- The participant moves outside the jurisdiction of HHA and the continuation of the CoP or completion of the CoP prior to the move is not possible.

Participants who fail to meet their FSS obligations, as determined by an FSS coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned representative to review the situation. At this meeting, a review of the Contract of Participation, Individual Training and Services Plan, and all related documentation will be conducted, and amendments may be made as necessary to allow for changes in circumstances. Failure to contact the FSS Coordinator to schedule this meeting within fourteen (14) days of a written request by the FSS program to set up this a meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue(s), may lead to termination from the FSS program. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program.

If the initial meeting does not resolve the problem, or if the meeting is not requested by the family within the required time period, HHA will send a notification of FSS program termination to the family. The notification will include the family right to request an informal hearing/grievance and the related time period for this request.

b. Voluntary Termination

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

- Mutual consent of both parties.
- The family's withdrawal from the program.

c. Termination with Escrow Disbursement

The CoP will be terminated with FSS disbursement of escrow under the following conditions:

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

d. Grievance and Hearing Procedures

If HHA decides to withhold escrow, terminate FSS supportive services or terminate the FSS contract because the family failed to comply with its FSS contract, HHA will offer the family the opportunity for an informal hearing in accordance with HHA's informal hearing policies. In Public Housing, the family is entitled to present a grievance in accordance with the public housing grievance procedures.

XVI. VOLUNTARY PROGRAM – ASSURANCE OF NON-INTERFERENCE

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

XVII. TIMETABLE FOR PROGRAM IMPLEMENTATION

HHA has established and implemented an FSS program prior to the changes incorporated into this updated Action Plan. Upon HUD approval, families who enroll in FSS will be subject to the

policies set forth in this updated Action Plan. HHA will also provide families who enrolled prior to HUD approval of the updated Action Plan with the opportunity to take advantage of the program modifications and enhancements by signing a new CoP. The effective date of the new CoP will not change; however, the end date of the CoP will change, per the new *24 CFR 984.303(c)* which states that “each FSS family will be required to fulfill CoP obligations no later than 5 years after the first re-examination of income after the execution date of the CoP.”

XVIII. REASONABLE ACCOMMODATIONS & LIMITED ENGLISH PROFICIENCY

HHA will follow its ACOP and Administrative Plan policies on reasonable accommodations as well as its Language Assistance Plan to ensure that the FSS program is accessible to individuals with disabilities as well as to families with limited English proficiency.

XIX. COORDINATION OF SERVICES

a. Certification of Coordination

Development of the services and activities under the FSS program has been coordinated with programs under title I of the Workforce Innovation and Opportunity Act 29 U.S.C. 3111 et seq., and other relevant employment, child care, transportation, training, education, and financial empowerment programs in the area. Implementation will continue to be coordinated, in order to avoid duplication of services and activities.

b. Program Coordinating Committee

The principal vehicle for ensuring ongoing coordination of services is the program coordinating committee (PCC), which has been established in accordance with FSS regulations to assist in securing commitments of public and private resources for the operation of the FSS Program. Among other responsibilities, the PCC will help the FSS program to identify and build strong referral relationships with providers of supportive services that meet the needs of FSS participants. The PCC will also be consulted in developing program policies and procedures.

The PCC includes the following representatives:

- One or more FSS Program Coordinators
- One or more participants from each HHA rental assistance program served by the FSS program.
- Representatives from a variety of agencies and individuals, which include but are not limited to the following:
 - a) Designate Member, HHA Section 3
 - b) Designate Member, Workforce Solution

- c) Designate Member, AVANCE
- d) Designate Member, Houston Area Urban League
- e) Designate Member, Houston Community College –Adult Services
- f) Designate Member, SER Jobs for Progress
- g) Designate Member, Texas Southern University
- h) Designate Member, Houston Food Bank

XX. FSS PORTABILITY

FSS participants may not exercise portability without prior approval from the HHA.

a. Moves into HHA's Jurisdiction

If an FSS participant moves into HHA's jurisdiction, they will be admitted in good standing into HHA's FSS program unless HHA is already serving the number of FSS families identified in this FSS Action Plan and determines that it does not have the resources to manage the FSS contract.

Regardless of whether HHA is able to receive an incoming family from another jurisdiction into FSS program, HHA will agree to allow and support porting families to remain in their initial PHA's FSS program after porting housing vouchers if the initial PHA requests that the family remain in their FSS program and can demonstrate the family is able to fulfill its responsibilities under the initial CoP, the move in jurisdictions notwithstanding;

b. FSS Termination with Escrow Disbursement for Porting Families

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

Where continued FSS participation is not possible, HHA will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR § 984.303(k)(1)(iii), or locating a receiving HHA that has the capacity to enroll the family into its FSS program.

APPENDIX A: HHA DEMOGRAPHIC DATA

HHA anticipates that the demographic profile of families served by the FSS program will largely mirror the demographics of families currently participating in the PH and HCV programs.

The FSS program will serve the following housing assistance programs

- ☒ Public Housing,
- ☒ Housing Choice Vouchers (HCV): Tenant-Based Vouchers
- ☒ Housing Choice Vouchers (HCV): Project-Based Vouchers (PBV)
- ☒ Housing Choice Vouchers (HCV): FUP, FUP-Y, FYI, VASH, EHV

Ages of Head of Household

| Description | Percentage |
|---------------------|------------|
| 24 Years or Younger | 1% |
| 25 to 50 | 46% |
| 51 to 61 | 20% |
| 62 or greater | 21% |

Ages of Other Adults in Household

| Description | Percentage |
|---------------------|------------|
| 24 Years or Younger | 52% |
| 25 to 50 | 28% |
| 51 to 61 | 15% |
| 62 or greater | 05% |

Presence & Ages of Children

| Description | Percentage |
|------------------------------------|------------|
| Only adults over 18 | 19% |
| One or more child age 13-17 | 33% |
| Children who are all 12 or younger | 48% |

Employment Status

| Description | Percentage |
|---|------------|
| Families with an employed head | 39% |
| Families whose head is unemployed | 61% |
| Employment Status of All family members | Percentage |
| Families with any member that is employed | 28% |
| Families with no employed member | 54% |

Annual Earned Income of Population

| Description | Percentage |
|---|------------|
| Annual household income<\$5,000 per year | 18% |
| Annual household income between \$5,000 and \$9,999 | 16% |
| Annual household income between \$10,000 and \$14,999 | 22% |
| Annual household income between \$15,000 and \$19,999 | 09% |
| Annual household income between \$20,000 and \$29,999 | 11% |
| Annual household income between \$30,000 and \$34,999 | 03% |
| Annual household income of \$35,000 or higher | 06% |

Elderly/Disability Status of Population to be Served

| Description | Percentage |
|---|------------------------|
| Elderly/Disability Status of Head of Household | |
| Head of Household is an elderly person without disabilities | 04% |
| Head of Household is an elderly person with disabilities | 19% |
| Head of Household is a non-elderly person without disabilities | 55% |
| Head of Household is neither an elderly person nor a person with disabilities | 22% |
| Elderly/Disability Status of All Household members | Public Housing* |
| Household includes an elderly person without disabilities | 19% |
| Household includes an elderly person with disabilities | 22% |
| Household includes a non-elderly person with disabilities | 08% |
| Household includes no elderly persons or persons with disabilities | 51% |

*Households can appear in more than one category

Race & Ethnicity

| Description | Percentage |
|---|------------|
| White | 09% |
| Black or African American | 77% |
| American Indian or Alaska Native | 00% |
| Asian | 02% |
| Native Hawaiian or other Pacific Islander | 00% |
| Not provided | 12% |

| Description | Percentage |
|--------------|------------|
| Hispanic | 06% |
| Non-Hispanic | 94% |