

Family Self-Sufficiency (FSS) Program Action Plan

**Housing Authority of McLean County, Illinois
September 2022**

**Approved by US Department of Housing and Urban Development
September 21, 2022**



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

September 21, 2022

Mr. Jeremy Hayes
Executive Director
Housing Authority of the County of McClean
104 East Wood Street
Bloomington, IL 61701

Dear Mr. Hayes:

Thank you for submitting your Family Self-Sufficiency (FSS) Action Plan. The Office of Public and Indian Housing staff reviewed your agency's Action Plan and determined it meets the requirements of the Final Rule. Therefore, your FSS Action Plan is approved.

If you have questions or concerns, please contact me at William.O.DawsonIII@hud.gov or Portfolio Management Specialist Steve DiPietro at steven.dipietro@hud.gov.

Sincerely,

William Dawson, MPA, Director
Illinois State Office of Public Housing
Region V

Table of Contents

1. Introduction
2. Program Objectives
3. Program Size and Characteristics
 - A. Family Demographics
 - B. Supportive Services Needs
 - C. Estimate of Participating Families
 - D. Other Self-Sufficiency Programs
4. Family Selection Procedures
 - A. Waiting List
 - B. Admission Preferences
 - C. Screening for Motivation
 - D. Compliance with Nondiscrimination Policies
 - E. Re-enrollment of prior FSS Participants
 - F. Head of FSS Family
5. Outreach
6. FSS Escrow Account and Other Incentives for Participants
 - A. Interim Disbursements
 - B. Uses of Forfeited Escrow Funds
7. Family Activities and Supportive Services
8. Method of Identifying Family Support Needs and Delivering Appropriate Support Services
 - A. Identifying Family Support Needs
 - B. Delivering Appropriate Support Services
 - C. Transitional Supportive Service Assistance
9. Contract of Participation
 - A. Form and Content of Contract
 - B. ITSP Goals
 - C. Determination of Suitable Employment
 - D. Contract of Participation Term and Extensions
 - E. Completion of Contract
 - F. Modification
 - G. Consequences of Noncompliance with the Contract
10. Program Termination, Withholding of Services, and Available Grievance Procedures
 - A. Involuntary Termination
 - B. Voluntary Termination
 - C. Termination with Escrow Disbursement
 - D. Grievance Procedures
11. Assurance of Non-Interference
12. Timetable
13. Reasonable Accommodations, Effective Communications, and Limited English Proficiency
14. Coordination of Services
 - A. Certification of Coordination
 - B. Program Coordinating Committee
15. FSS Portability (Applicable to HCV Only)
 - A. Portability in Initial 12 Months
 - B. Moves into the PHA's Jurisdiction
 - C. FSS Termination with Disbursement for Porting Families
16. Other Policies
17. Definitions

1. Introduction

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by the Housing Authority of the City of Bloomington (referred to herein as the “Housing Authority” or “BHA”). The Housing Authority operates a public housing program and Section 8 housing choice voucher (HCV) program; FSS is open to participants of both programs. The Housing Authority also operates the HCV program on behalf of the Housing Authority of McLean County (“MCHA”), thus making its FSS program a joint program of the two agencies. With the exception of section 3.A., Family Demographics, the Action Plan for the two agencies are identical. This Action Plan was submitted to HUD in September of 2022 and approved on September 21, 2022.

The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of HUD assistance with public and private resources in order to enable eligible families to make progress toward economic security.

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. This FSS Action Plan describes the Housing Authority’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, 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 PHA staff are consistent with the Housing Authority’s personnel policy and Agency Plan.

2. Program Objectives

The Housing Authority’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
- Improve the family’s overall wellbeing

3. Program Size and Characteristics

A. Family Demographics

These tables describe the demographics of the population expected to be served by the Housing Authority’s FSS program.

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): HCV Homeownership
- Housing Choice Vouchers (HCV): Other special purpose vouchers (e.g. FUP, FUP-Y, FYI, VASH, EHV, etc.) (As of September 2022, the Housing Authority’s only special purpose vouchers are VASH; if the Housing Authority receives other special purpose vouchers in the future, those voucher-holders will also be eligible to participate in FSS)
- Section 8 Moderate Rehabilitation
- Project-Based Rental Assistance (PBRA)
- Other Program (Specify: _____)

As of September 2022, the Housing Authority’s FSS program is comprised of 21 families in the public housing program and 20 families in the HCV program, for a total enrollment of 41 families. Of the 20 FSS families participating in the HCV program, 6 have BHA vouchers and 14 have MCHA vouchers. The Housing Authority estimates a capacity to serve approximately 60 families.

The Housing Authority’s FSS program dates to 1995. Since that time, the participants in the programs have represented various age groups, family types, and other demographic characteristics. The Housing Authority expects that in the future, the FSS program will serve a population similar to the population currently enrolled in the program. The following tables in this section provide demographic characteristics of 25 BHA households currently or recently enrolled in FSS, which illustrates the population expected to be served by the Housing Authority’s FSS program going forward.

Gender of Head of Household

	Percent
Female head of household	96%
Male head of household	4%

Age of Head of Household

	Percent
Head of household age 24 years or younger	0%
Head of household age 25 to 50	84%
Head of household age 51 to 61	12%
Head of household age 62 or greater	4%

Presence of Children

	Percent
Households that only include adults over age 18	20%
Households that include one or more child (age 0-17)	80%

Employment Status of Population to be Served

	Percent
Household with wage income	56%
Households with non-wage income or zero income	44%

Annual Income of Population to be Served

	Number	Percent
Annual household earnings <\$5,000 per year	7	28%
Annual household earnings between \$5,000 and \$9,999	5	20%
Annual household earnings between \$10,000 and \$14,999	3	12%
Annual household earnings between \$15,000 and \$19,999	2	8%
Annual household earnings between \$20,000 and \$24,999	2	8%
Annual household earnings between \$25,000 and \$29,999	2	8%
Annual household earnings between \$30,000 and \$34,999	0	0%
Annual household earnings of \$35,000 or higher	4	16%
TOTAL	25	100.0%

Disability Status of Population to be Served

	Percent
Head of Household is a person with disabilities	16%
Head of Household is a person without disabilities	84%

Race and Ethnicity of Population to be Served (required)

Race		Non-Hispanic	Hispanic
White	24%	24%	0%
Black or African-American	76%	76%	0%
American Indian or Alaska Native	0%	0%	0%
Asian	0%	0%	0%
Native Hawaiian or other Pacific Islander	0%	0%	0%
Other Race	0%	0%	0%

B. Supportive Services Needs

The following is a list of the supportive service needs of the families expected to enroll in the Housing Authority's FSS program:

- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerated basic skills instruction
- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for childcare
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Health care, dental care, and mental health care, including substance abuse treatment/counseling
- Homeownership readiness

This list of supportive services needs is based on:

- Experience with past FSS or other supportive service program participants
- Input from the PCC or other service provider partners
- A needs assessment completed on **[date]**
- Other: _____

C. Estimate of Participating Families

Over time, the Housing Authority hopes to serve all families who are interested in participating in the FSS Program. The number of spaces available in the program at any given time, however, will be limited by the program’s resources, including the number of FSS coordinators funded to work with FSS participants. New families will be admitted to the FSS program as space permits. In recent years, the Housing Authority has been funded for one (1) coordinator. The minimum number of participants required to be served based on this funding is 25.

Historically, the Housing Authority’s FSS program has enrolled approximately 10 new families into the FSS program each year. Accordingly, the Housing Authority expects to be able to provide FSS Services to approximately 100 families over a five-year period.

D. Other Self-Sufficiency Programs

The Housing Authority expects to enroll into FSS families from the self-sufficiency programs checked in the table below.

Name of Program	Check box if applicable	Number of families each year
Family Unification Program - Family	<input type="checkbox"/>	
Family Unification Program – Youth (FUP-Y)	<input type="checkbox"/>	
Foster Youth Initiative (FYI)	<input type="checkbox"/>	
Resident Opportunity and Self-Sufficiency (ROSS)	<input checked="" type="checkbox"/>	3

Jobs Plus	<input type="checkbox"/>	
Emergency Housing Voucher (EHV)	<input type="checkbox"/>	
Veterans Affairs Supportive Housing (VASH)		
Other:	<input type="checkbox"/>	

4. 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 and the date of their application.

B. Admissions Preferences

The FSS program has not adopted any admissions preferences. Families for the FSS program will primarily be selected on a first come-first serve basis.

All families residing in Public Housing will be initially informed of the existence of the FSS program through the following options:

- Pre-Move-In Interview conducted as part of the public housing application
- Orientation of new public housing residents
- New Resident Move-In Interview (one month after resident moves into apartment)

All of the above are conducted by the Resident Services Department of the Housing Authority. If less than the desired number of families from Public Housing contact the FSS Coordinator, special attempts (including home visits) will be made to reach out to the families.

All families participating in the Housing Authority's housing choice voucher program will receive information on the FSS program through the new voucher-holder orientation. The HCV Department staff will also refer interested voucher-holders to the FSS Coordinator.

Families will be selected based on the following selection method:

Selection Method	Check applicable method
Lottery	<input type="checkbox"/>
Length of time living in subsidized housing	<input type="checkbox"/>
Date the family expressed an interest in participating in the FSS program	<input checked="" type="checkbox"/>
Other:	<input type="checkbox"/>

C. Screening for Motivation

The Housing Authority's FSS program will use one or more motivational screening factors to measure the family's interest and motivation to participate in the FSS program. The following screening criteria will be used:

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

D. Compliance with nondiscrimination policies

It is the policy of the Housing Authority’s FSS program 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, the Housing Authority’s FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).

The FSS program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS coordinator 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, the Housing Authority will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

E. Re-enrollment of prior FSS participants

The following previous FSS families will be allowed to re-enroll in the Housing Authority’s FSS program:

- FSS participants who have withdrawn voluntarily [After 6 months from exit]
- Families terminated with escrow disbursement [After 6 months from exit]
- Families involuntarily terminated [After 6 months from exit]
- Family members who were not Heads of FSS Family previously
- No member of previously enrolled families may re-enroll

Families that successfully complete the program may not apply for re-admission into the program.

F. Head of FSS Family

The head of the FSS family is designated by the participating family. The Housing Authority 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 the Housing Authority in:

- Writing
- A form developed by the Housing Authority
- Other

5. Outreach

The Housing Authority’s FSS program will conduct widespread outreach to encourage enrollment in the FSS program. Outreach efforts will include the activities identified through the checked boxes below: Interpreters will be used as needed and clients may contact staff to express interest in person, via our toll-free telephone number or by email.

Outreach Methods	Details, including frequency
<input checked="" type="checkbox"/> Posting information about FSS on the Housing Authority website	Ongoing basis
<input type="checkbox"/> Posting FSS program flyers in locations likely to be seen by eligible families	
<input checked="" type="checkbox"/> Providing information about the FSS program during scheduled reexaminations	Annual reexaminations
<input checked="" type="checkbox"/> Providing information about the FSS program at voucher orientation sessions	At lease-up
<input checked="" type="checkbox"/> Holding well-publicized information sessions about FSS	Periodically
<input checked="" type="checkbox"/> Providing information about the FSS program to eligible families by mail	Periodically
<input checked="" type="checkbox"/> Facebook	
<input type="checkbox"/> Twitter	
<input type="checkbox"/> Instagram	
<input type="checkbox"/> Other [specify]	

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

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

Outreach efforts will be targeted equally to all families, using materials in both English and other commonly spoken languages to ensure that non-English and limited English-speaking families receive information and have the opportunity to participate in the FSS Program. In conducting outreach, the Housing Authority 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.

6. FSS Escrow Account and Other Incentives for Participants

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account that are offered by the Housing Authority are described below.

A. Interim Disbursements

The Housing Authority will allow for interim disbursements subject to certain specified limitations:

Once the FSS family has fulfilled at least one interim goal, the family may request an interim disbursement from the escrow 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).

To be eligible for an interim disbursement, a family must:

- Verify that it is independent of Federal and State cash maintenance payments designed to meet the family's ongoing basic needs.
- Have been employed (either part time or full time) for a period of at least one full year prior to the request.

The family will only be allowed to receive one interim disbursement per year. The minimum amount of an interim disbursement is \$1,000, and at least \$1,000 must remain in the family's escrow account.

Requests will be made by filling out the **FSS Interim Distribution Request Form**. Requests may be made throughout the term of the Contract of Participation. 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 the Resident Services Director of the Housing Authority. 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.

Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment. Certainly guidelines / limitations apply to interim disbursement requests, as noted in the table below. The FSS Coordinator and the Resident Services Director of the Housing Authority will consider requests for interim disbursement in light of these policies and applicable federal requirements.

Specific guidelines / limitations apply to interim disbursement requests for the expenditure types checked in the box below.

Expenditure Type	Guidelines / Limitations
<input checked="" type="checkbox"/> Debt repayment	<input checked="" type="checkbox"/> Interim disbursements will be allowed for repayment of debt incurred prior to starting the FSS program, but not for debt incurred afterwards <input checked="" type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> An interim disbursement for debt repayment may not exceed x% of the participant's escrow savings. <input type="checkbox"/> Other: <input type="checkbox"/> Interim disbursements will not be allowed for debt repayment
<input checked="" type="checkbox"/> Car Purchase / Repair	<input type="checkbox"/> Families interested in using an interim disbursement to purchase a car must first ask the PHA for a referral to [add partner name] that provides discounted cars. <input type="checkbox"/> The maximum interim disbursement that will be allowed for a car purchase is: [add] <input checked="" type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> The terms of any car purchase or car loan will be scrutinized to ensure the terms are reasonable. <input checked="" type="checkbox"/> Head of FSS Household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle. <input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input checked="" type="checkbox"/> Other: Major non-routine vehicle repair. The Head of Household must provide to the FSS Coordinator a satisfactory plan to deal with such expenses in future. This shall be accomplished through a budgeting plan which includes a portion of savings dedicated to cover vehicle repairs in the future. <input type="checkbox"/> Interim disbursements will not be allowed for car purchase.

B. Uses of forfeited escrow funds.

The Housing Authority will use forfeited escrow funds for the following purposes:

- Training programs for FSS participants in good standing, as authorized by the FSS Coordinator and Resident Services Director;

- Training for FSS program staff, as authorized by the Executive Director of the Housing Authority;
- Disbursement to participants in good standing on an even pro rata basis.

7. Family Activities and Supportive Services

As described in the next section, all families participating in the FSS program will benefit from coaching that helps them identify and achieve goals that the family selects. Drawing on partners on the program coordinating committee and relationships with other service providers, the FSS Coordinator will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals:

Supportive Service Category	Specific Service	Source/Partner
<input checked="" type="checkbox"/> Assessment	<input checked="" type="checkbox"/> Vocational Assessment <input checked="" type="checkbox"/> Educational Assessment <input checked="" type="checkbox"/> Disability Assessment <input checked="" type="checkbox"/> Other specialized assessments	Heartland Community College Illinois Dept. of Rehabilitation Services
<input checked="" type="checkbox"/> Child Care	<input checked="" type="checkbox"/> Infant Care / Toddler Care <input checked="" type="checkbox"/> Preschool Care <input checked="" type="checkbox"/> Afterschool Care <input checked="" type="checkbox"/> Homework Assistance	Heartland Head Start District 87, Unit 5 YWCA, YMCA
<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Bus passes <input checked="" type="checkbox"/> Assistance with car repairs <input type="checkbox"/> Assistance with car purchase	Connect Transit Mid Central Community Action Agency
<input checked="" type="checkbox"/> Education	<input checked="" type="checkbox"/> High School Equivalency/GED <input checked="" type="checkbox"/> English as a Second Language <input checked="" type="checkbox"/> Post-secondary certificates <input checked="" type="checkbox"/> Advanced Degrees	Heartland Community College Illinois State University Illinois Wesleyan University
<input checked="" type="checkbox"/> Skills Training	<input checked="" type="checkbox"/> Training in Executive Function <input checked="" type="checkbox"/> Basic Skills Training <input type="checkbox"/> Emerging Technologies Training <input type="checkbox"/> Biomedical Training (including CNA, phlebotomy, x-ray and other tech, etc.) <input checked="" type="checkbox"/> On-the-Job Training <input checked="" type="checkbox"/> Apprenticeships <input checked="" type="checkbox"/> Skilled Labor training	Heartland Community College Family Community Resource Center Labor unions

<input checked="" type="checkbox"/> Job Search Assistance	<input checked="" type="checkbox"/> Resume Preparation <input checked="" type="checkbox"/> Interviewing Skills <input checked="" type="checkbox"/> Dress for Success <input checked="" type="checkbox"/> Workplace Skills <input checked="" type="checkbox"/> Job Development <input checked="" type="checkbox"/> Job Placement	Family Community Resource Center Mid Central Community Action Agency Heartland Community College
<input checked="" type="checkbox"/> Micro and Small Business Development	<input checked="" type="checkbox"/> Small business development services <input type="checkbox"/> Small business Mentoring <input type="checkbox"/> Entrepreneurship Training	Small Business Development Center
<input checked="" type="checkbox"/> Health/Mental Health Care	<input checked="" type="checkbox"/> Alcohol and Drug Abuse Prevention <input checked="" type="checkbox"/> Alcohol and Drug Abuse Treatment <input checked="" type="checkbox"/> Primary care <input checked="" type="checkbox"/> Dental services <input checked="" type="checkbox"/> Mental Health Services <input checked="" type="checkbox"/> Health Insurance Advising	McLean County Health Department Chestnut Health Systems McLean County Center for Human Services Community Healthcare Clinic
<input checked="" type="checkbox"/> Crisis Services	<input checked="" type="checkbox"/> Crisis Assessment <input checked="" type="checkbox"/> Crisis Intervention <input checked="" type="checkbox"/> Crisis Management <input checked="" type="checkbox"/> Crisis Resolution	PATH Chestnut Health Systems Children’s Home+Aid
<input checked="" type="checkbox"/> Child/Adult Protective Services	<input type="checkbox"/> Needs Assessment <input type="checkbox"/> Case Planning <input checked="" type="checkbox"/> Information Referral	Children’s Home+Aid
<input checked="" type="checkbox"/> Household Management	<input checked="" type="checkbox"/> Training in Household Management	Mid Central Community Action Agency
<input checked="" type="checkbox"/> Homeownership Preparation	<input checked="" type="checkbox"/> Homeownership Education <input checked="" type="checkbox"/> Housing Counseling <input checked="" type="checkbox"/> Down Payment Assistance <input checked="" type="checkbox"/> Other Homeownership Assistance	Mid Central Community Action Agency
<input checked="" type="checkbox"/> Financial Empowerment	<input checked="" type="checkbox"/> Financial education <input checked="" type="checkbox"/> Financial coaching <input type="checkbox"/> Banking services <input checked="" type="checkbox"/> Training in money management	Mid Central Community Action Agency
<input checked="" type="checkbox"/> Individual Development Accounts	<input checked="" type="checkbox"/> Matched Savings Accounts	Mid Central Community Action Agency
<input checked="" type="checkbox"/> Legal Services	<input checked="" type="checkbox"/> Legal Services	Prairie State Legal

<input checked="" type="checkbox"/> Debt Resolution & Credit Repair	<input checked="" type="checkbox"/> Assistance negotiating the resolution of past-due debt	Chestnut Health Systems
<input type="checkbox"/> Other:		

8. Method of Identifying Family Support Needs and Delivering Appropriate Support Services

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 enrollment packet 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 Support Services

All families who participate in the FSS program 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 limitations on staff capacity, the Housing Authority will try to help these families with appropriate referrals. The time spent on these referrals will not be covered by funds designated by HUD to support the FSS program.

9. Contract of Participation

All families enrolled in the FSS program will be required to sign a Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). This section describes the contents of the CoP and the Housing Authority FSS Program policies and practices regarding the CoP.

A. Form and content of contract

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 the Housing Authority, 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.

B. ITSP goals

Each individual's ITSP will establish specific interim and final goals by which the Housing Authority 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, the Housing Authority will establish as a final goal that every member of the family become independent from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

C. Determination of suitable employment

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

D. Contract of Participation term and extensions

The CoP will go into effect on the first day of the month following the execution of the CoP. The initial term of the CoP will run the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. Families may request up to two one-year extensions and are required to submit a written request that documents the need for the

extension. The Housing Authority will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

- (i) Circumstances beyond the control of the FSS family, as determined by the Housing Authority such as a serious illness or involuntary loss of employment;
- (ii) 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 the Housing Authority or
- (iii) Any other circumstances that the Housing Authority determines warrants an extension.

E. Completion of the contract

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

The Housing Authority will require a combination of self-certification and third-party verification to document completion of ITSP goals.

F. Modification

The Housing Authority 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 the Housing Authority as well as the Head of FSS Family.

The Housing Authority 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 the Housing Authority, designate another family member to be the FSS head of family
- When a relocating family is entering the FSS program of a receiving PHA and the start date of the CoP must be changed to reflect the date the new CoP is signed with the receiving PHA
- Other:

The Housing Authority will not allow modifications if the CoP is within six months from the end of the term.

G. Consequences of noncompliance with the contract

Participant non-compliance with the CoP may result in termination from the FSS program. See policies on Involuntary Termination in Section X(A).

10. Program Termination, Withholding of Services, and Available Grievance Procedures

A. Involuntary Termination

The Housing Authority may involuntarily terminate a family from FSS under the following circumstances:

- I. 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:
 - i. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
 - ii. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities
 - iii. Failure to complete activities and/or goals within the specified time frames; and/or
- II. If the participant's housing assistance has been terminated.

Participants who fail to meet their obligations under paragraph I above, as determined by an FSS coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned the Housing Authority 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 will be made as necessary (within HUD guidelines) 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 program. The FSS Coordinator will also attempt to contact the participant via phone, text, in person and/or email prior to the review meeting. 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 period, notification of termination will be made to the family by letter stating:

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

B. Voluntary Termination

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

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

C. Termination with Escrow Disbursement

In most cases, families whose FSS contracts are terminated will not be entitled to disbursement of their accrued FSS escrowed funds. However, the CoP will be terminated with FSS disbursement when one of the following situations occurs:

- (i) Services that the Housing Authority and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.
- (ii) The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the Housing Authority and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- (iii) An FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR §982.353) 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.

D. Grievance Procedures

All requests for an informal hearing must be received by the Housing Authority FSS Program Coordinator within fourteen (14) business days of the date of the FSS termination letter. If a hearing is requested by the FSS family, notification to the family regarding the date, time, and location of the informal hearing will be made by mail.

Persons included in the informal hearing shall include, but not be limited to:

- The FSS head of household;
- The FSS Coordinator; and
- The Housing Authority staff members, other than FSS program staff, serving as the Hearing Officer

All participants have the right to obtain legal representation and provide their witnesses. 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 in writing within (5) days prior to the hearing date.

If the family does not appear at the scheduled time and was unable to reschedule the hearing in advance due to the nature of the emergency, the family must contact the Housing Authority within 24 hours of the scheduled hearing date, excluding weekends and holidays. The Housing Authority will then reschedule the hearing. The Hearing Officer will issue a written decision to the family within ten (10) business days after the hearing. The decision made by the Hearing Officer will be final. The Housing Authority reserves the right to overturn the Hearing Officer's decision only in the event that the decision is contrary to the organization's written policies.

11. 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 the Housing Authority FSS Program's decision of whether to admit the family into any other Resident Services programs. 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.

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

12. Timetable

The Housing Authority implemented its FSS program in 1996 and will continue to implement it per this FSS Action Plan.

13. Reasonable Accommodations, Effective Communications, and Limited English Proficiency

Requests for Reasonable Accommodations

A person with disabilities may request reasonable accommodations to facilitate participation in the FSS program. Requests will be considered on a case-by-case basis.

Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's reasonable accommodations policy. The policy is available online at www.bloomingtonha.com.

Request for Effective Communications

A person with disabilities may request the use of effective communication strategies in order to facilitate participation in the FSS program. Examples include: appropriate auxiliary aids and services, such as interpreters, computer-assisted real time transcription (CART), captioned videos with audible video description, visual alarm devices, a talking thermostat, accessible electronic communications and websites, documents in alternative formats (e.g., Braille, large print), or assistance in reading or completing a form, etc.

Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's effective communications policy. The policy is available online at www.bloomingtonha.com.

Limited English Proficiency

The Housing Authority will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available online at www.bloomingtonha.com.

14. 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, childcare, 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 will meet once every four months and may conduct business on an as-needed basis via email or virtually. The PCC will include (but might not be limited to) the following representatives:

- Representative from the Illinois Department of Human Services
- Workforce Development Board
- Heartland Community College
- GED/Adult Literacy program
- Countering Domestic Violence/Neville House
- Representative from the banking industry
- Church group representative.

15. FSS Portability (Applicable to HCV Only)

A. Portability in initial 12 months

While the Housing Authority is not required to allow FSS participants to exercise portability within the initial 12 months after signing a CoP, it is the policy of the Housing Authority to allow for portability within this period to the extent feasible.

B. Moves into the PHA's jurisdiction

If an FSS participant moves into the PHA's jurisdiction, they will be admitted in good standing into the Housing Authority FSS program unless the Housing Authority 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 the Housing Authority is able to receive an incoming family from another jurisdiction into the FSS program, the Housing Authority 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 the initial FSS program and can demonstrate the family is able to fulfill its responsibilities under the initial CoP, the move in jurisdictions notwithstanding.

C. FSS termination with disbursement for porting families

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

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

16. Other Policies

Policy	Where Addressed in Plan
(i) Policies related to the modification of goals in the ITSP;	Section 9 Contract of Participation
(ii) The circumstances in which an extension of the Contract of Participation may be granted	Section 9: Contract of Participation
(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any)	Section 6: FSS Escrow Account and Other Incentives for Participants
(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing	Section 6: FSS Escrow Account and Other Incentives for Participants
(v) Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating	Section 4. Family Selection Procedures
(vi) Policies on requirements for documentation for goal completion;	Section 9: Contract of Participation
(vii) Policies on documentation of the household’s designation of the “Head of FSS Household”;	Section 4. Family Selection Procedures

(viii) Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference)	Section 4: Family Selection Procedures
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17. Definitions

The definitions below are specified in CFR 24 984.103. The terms 1937 Act, Fair Market Rent, Head of Household, HUD, Public Housing, Public Housing Agency (PHA), Secretary, and Section 8, as used in this part, are defined in 24 CFR Part 5.

Certification means a written assertion based on supporting evidence, provided by the FSS family or the Housing Authority, as may be required under this part, and which:

- (1) Shall be maintained by the Housing Authority in the case of the family’s certification, or by HUD in the case of the PHA’s or owner’s certification.
- (2) Shall be made available for inspection by HUD, the Housing Authority and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or the Housing Authority as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

Contract of Participation (CoP) means - a contract, in a form with contents approved by HUD, entered into between an FSS family and the Housing Authority operating an FSS Program that sets forth the terms and conditions governing participation in the FSS Program. The CoP includes all Individual Training and Services Plans (ITSPs) entered into between the Housing Authority and all members of the family who will participate in the FSS Program, and which plans are attached to the CoP as exhibits. For additional detail, see § 984.303.

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

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

Enrollment means the date that the FSS family entered into the CoP with the Housing Authority
Family Self-Sufficiency (FSS) Program means the program established by a PHA within its jurisdiction or by an owner to promote self-sufficiency among participating families, including the coordination of supportive services to these families, as authorized by section 23 of the 1937 Act.

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

FSS escrow credit means the amount credited by the Housing Authority to the FSS family’s FSS escrow account.

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

FSS family in good standing means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the Housing Authority;

and is in compliance with the regulations regarding participation in the relevant rental assistance program.pro

FSS related service program means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of “supportive services” set forth in this § 984.103.

FSS slots - refers to the total number of families (as determined in the Action Plan and, for mandatory programs, in § 984.105 of this part) that the PHA will serve in its FSS Program.

FSS Program Coordinator means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS participants; goal setting and case management/coaching of FSS participants; working with the community and service partners; and tracking program performance.

FY means Federal Fiscal Year (starting October 1 and ending September 30, and year designated by the calendar year in which it ends).

Head of FSS family means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent.

Individual Training and Services Plan (ITSP) means a written plan that is prepared by the Housing Authority in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

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

Each ITSP must be signed by the Housing Authority and the participating FSS family member, and is attached to, and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS Program, including the head of FSS family who has signed the CoP.

Owner means the owner of multifamily assisted housing.

Self-sufficiency means that an FSS family is no longer receiving Section 8, Public Housing assistance, or any Federal, State, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS escrow account funds.

Supportive services mean those appropriate services that the Housing Authority will coordinate on behalf of an FSS family under a CoP, which may include, but are not limited to:

- (1) *Childcare*—childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- (2) *Transportation*—transportation necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment;
- (3) *Education*—remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;
- (4) *Employment Supports*—job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;

- (5) *Personal welfare*—substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services;
- (6) *Household management*—training in household management;
- (7) *Homeownership and housing counseling*— homeownership education and assistance and housing counseling;
- (8) *Financial Empowerment*—training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing and improving credit scores, etc.;
- (9) *Other services*—any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD’s legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act.

Welfare assistance means (for purposes of the FSS program only) income assistance from Federal, (i.e. Temporary Assistance for Needy Families (TANF) or subsequent program) State, or local welfare programs and includes only cash maintenance payments designed to meet a family’s ongoing basic needs. Welfare assistance does not include:

- (1) Nonrecurrent, short-term benefits that:
 - (i) Are designed to deal with a specific crisis or episode of need;
 - (ii) Are not intended to meet recurrent or ongoing needs; and,
 - (iii) Will not extend beyond four months.
- (2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- (3) Supportive services such as childcare and transportation provided to families who are employed;
- (4) Refundable earned income tax credits;
- (5) Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF);
- (6) Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;
- (7) Amounts solely directed to meeting housing expenses;
- (8) Amounts for health care;
- (9) Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;
- (10) Supplemental Security Income, Social Security Disability Income, or Social Security; and
- (11) Child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child’s need and not on the need of the child’s current non-parental caretaker.