



Yolo County Housing

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DATE: April 2nd, 2009
TO: YCH Board of Commissioners
FROM: Lisa A. Baker, Executive Director
SUBJECT: **Review and Approve Adoption of the Revised Family Self-Sufficiency Action Plan**

RECOMMENDED ACTIONS

1. Review and approve Family Self-Sufficiency Action Plan and authorize implementation of changes;
2. Authorize the Executive Director to execute MOUs with partner agencies as needed.

BACKGROUND/DISCUSSION

As part of earlier Voucher funding commitments received from the U.S. Department of Housing and Urban Development (HUD), YCH is currently required by HUD to administer a Family Self-Sufficiency (FSS) Program. The purpose of the Family Self-Sufficiency program is to reduce the dependency of low-income families on welfare assistance and on Housing Choice Voucher, public assistance, or any Federal, State, or local rent or homeownership program. Under federal requirements, YCH must assist thirty-four families under the FSS program in a mandatory program until there have been sufficient graduates from the program to fill those thirty-four slots. In September 2008, YCH graduated four FSS participants from the program, and again in January 2009, YCH graduated four additional FSS participants from the program. There are twenty-six remaining slots for YCH to fill as part of its mandatory commitment.

The Family Self-Sufficiency Program is guided by an Action Plan, or a plan that contains all of the policies and procedures that YCH will use to administer the Family Self-Sufficiency Program. The YCH has not updated its Plan since its inception and does not have a current Plan with which to administer the program. To correct this deficiency, staff has undertaken to create this revision in order to meet program compliance requirements.

YCH is responsible for complying with all changes in HUD regulations pertaining to the Family Self-Sufficiency Program and for incorporating them into the Action Plan. When such changes conflict with the Plan, HUD regulations will have precedence until such time as the Action Plan can again be amended for compliance.

The Action Plan has been designed to accomplish a number of objectives:

- a. To set forth and define YCH's local policies for operation of Family Self-

Sufficiency program within the context of federal laws and regulations;

- b. To ensure that existing policies are not in conflict with federal requirements or with additional policies adopted by the YCH;
- c. To add local implementing policies for additional federal requirements (such as the Program Coordinating Committee).

Contents of the Action Plan

Current HUD regulations contain a list of what must be included in the FSS Action Plan. YCH's Action Plan must cover YCH policies on the following subjects:

- **Family demographics:** a description of the number, size, characteristics including racial and ethnic data, and the supportive service needs of the families expected to participate in the FSS program.
- **Estimate of Participating Families:** a description of the number of eligible FSS families, who can reasonably be expected to receive supportive services under the FSS program, based on available Federal, tribal, State, local and private resources.
- **Number of Eligible Families (if applicable):** Number of families from Project Self-Sufficiency, Operation Bootstrap, or other local self-sufficiency programs who are expected to agree to execute an FSS contract of participation.
- **FSS Family Selection Procedures:** A statement of the policies and procedures used to select families for FSS participation in accordance with HUD-required family selection procedures. This statement must describe how these selection policies and procedures ensure non-discrimination with regard to race, color, religion, sex, handicap, familial status or national origin.
- **Incentives:** A statement of the incentives the YCH offers eligible families to encourage their participation in the FSS program (incentives plan). This plan provides for the establishment of the FSS account, as well as any other incentives offered by the YCH.
- **Outreach Efforts:** Description of how the YCH notifies and recruits participants from among eligible families. How the YCH assures that both minority and non minority groups are informed, and how this information is made known (e.g., flyers, posters, advertisements in newspapers of both general circulation as well as those targeted to minorities).
- **Activities and Supportive Services:** A description of activities and supportive services provided to families from public and private resources.
- **Identification of Support Needs:** The methods used for identifying and delivering support services according to the needs of FSS families.
- **Program Termination, Withholding of Services, Grievance Procedures:** A description of the YCH's policies concerning termination of FSS participation and withholding of services for families who fail to comply with the Contract of Participation. The grievance and hearing procedures that are available to the families.

- **Assurance of Non-interference:** The YCH must assure that a family's decision to not participate in the FSS program does not affect its admission or right to occupancy in accordance with its lease.
- **Timetable for Implementation:** Include a timetable for filling FSS slots in accordance with HUD requirements.
- **Certification of Coordination:** A certification that the development of services and activities has been coordinated with the Welfare to Work program, Workforce Investment Act, and any other relevant employment, child care, transportation, training, and education programs in order to assure that implementation will continue to be coordinated to avoid duplication of services and activities.
- **Optional Information:** Any other information to help HUD determine the soundness of the YCH's proposed program.

HUD expects YCH to develop policies and procedures that are consistent with mandatory policies. YCH's Action Plan is the foundation of those policies and procedures. HUD's directions require YCH to make policy choices that provide guidance to staff and consistency to program applicants and participants.

Updating and Revising the Plan

Drafting the FSS Action Plan was one of the items identified by new management as a change needed for overall program improvement in late 2006 and early 2007. Subsequently, in April 2007, when the YCH underwent the Comprehensive Tier Review by the Recovery and Protection Corps (RPC) of HUD, the creation of the FSS Action Plan was noted as needed and was included in the Corrective Action Plan entered into between HUD and the YCH as approved by the Board in December 2007.

The Plan has now been comprehensively reviewed by staff and by a consultant retained by HUD to provide additional assistance to the Voucher Division. The new Plan has been structured to provide the reader with access to the information in a format that, to the extent possible, mirrors the steps the YCH and an FSS Participant would go through in the order in which they would go through them.

The FSS Action Plan is intended to be a "living document" and staff will make ongoing recommended changes to the Plan as needed - both to improve readability and accessibility, as well as to comply with changes in State and Federal law that have an impact on how the program can operate.

FISCAL IMPACT

Having a HUD approved FSS Action Plan is required by the federal regulations and is the basis for continued receipt of federal funds from HUD for the operation of the Family Self-Sufficiency Program.

CONCLUSION

YCH has done a complete review of the Family Self-Sufficiency Action Plan. This Plan is one of the critical steps necessary to bring the FSS Program into full compliance with all current HUD regulations and requirements. Staff recommends the adoption of this Plan revision.

Attachments: Resolution
FSS Action Plan

**YOLO COUNTY HOUSING
RESOLUTION NO. 09-_____**

**(Resolution Adopting the Family Self-Sufficiency
Action Plan)**

WHEREAS, the Housing Authority of the County of Yolo ("YCH") must comply with the regulations and guidelines set forth by the U.S. Department of Housing and Urban Development ("HUD"); and

WHEREAS, the Family Self-Sufficiency Action Plan ("FSS Action Plan") and any changes requires the approval and authorization of the Board of Commissioners of the Housing Authority of the County of Yolo ("YCH"); and

WHEREAS, the Board of Commissioners of YCH have determined to the best of their knowledge that the FSS Action Plan Revision is in conformance with federal requirements.

NOW, THEREFORE, BE IT RESOLVED, ORDERED AND FOUND by the Board of Commissioners of the Housing Authority of the County of Yolo, as follows:

1. The foregoing recitals are true and correct.
2. The Board of Commissioners hereby confirms and adopts the Family Self-Sufficiency Action Plan revision.

EFFECTIVE DATES: This Resolution shall take effect from and after the date of its adoption.

PASSED AND ADOPTED, by the Board of Commissioners of the Housing Authority of the County of Yolo, State of California, this 2nd day of April 2009, by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

Helen Thomson, Chair
Board of Commissioners of the
Housing Authority of the County of Yolo

Approved as to Form:

Agency Counsel

By _____
Sonia Cortes

Attest:
Ana Morales, Clerk
Board of Commissioners of the
Housing Authority of the County of Yolo

By _____
Deputy

Yolo County Housing

**Family Self-Sufficiency
Program**

Action Plan

Revised: March 2009

Adopted By Board of Commissioners: _____

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I. INTRODUCTION

Purpose

The purpose of the Family Self-Sufficiency (FSS) Program is to provide opportunities to Housing Choice Voucher (HCV) families to move toward economic independence and self-sufficiency. The FSS Program will assist very low-income families receiving assistance through the HCV Program to receive comprehensive supportive services that will enable them to achieve economic independence and self-sufficiency by reducing dependency on welfare assistance, housing assistance, and other Federal, State and local subsidies.

The FSS Coordinator will work with each client to develop a step-by-step plan which will guide them to success and graduation from the program. Upon graduation from the program, each participant will receive the amount that was earned in an escrow account that was maintained for them during their participation. The amount in the escrow account will be given to the family at graduation. This money will support the family to continue in their personal goals and endeavors, and attain economic self-sufficiency.

Objectives

To meet the goals of the FSS Program, Yolo County Housing's (YCH) objectives are:

1. To create partnerships with public and private agencies to provide quality supportive services. The expectation from these partnerships is to provide referrals for supportive services including, but not limited to, childcare, employment, education, life skills, and homeownership. The supportive services will enable the FSS participants to meet the goals defined in their FSS contract and to move toward achieving financial independence and self-sufficiency.
2. To provide families with stable rental assistance support while in FSS, allowing them to participate in employment education and job training programs.
3. To provide participating families with an opportunity to save for the future through the establishment of an interest-bearing escrow account.

Measuring Program Success

FSS Program success is determined by:

- The number of families enrolled
- The number of families with increased earnings which result in escrow balances
- The number of families that graduate successfully from the FSS program
- The number of family members who, as a result of participation in the FSS Program, completed their goals in the FSS contract, such as:
 - Achieve their first job
 - Obtain higher paying employment
 - No longer receive welfare benefits (cash assistance payments)
 - Gain a GED or High School Diploma
 - Complete job training or education program
 - Repair credit history
 - Gain money management skills
 - Learn to read
 - No longer need housing assistance
 - Purchase a home

Program Size

When funding is available, YCH will enroll existing HCV participants whose eligibility has been determined. As of June, 30, 2008, YCH had thirty-four (34) mandatory program slots. HUD regulations reduce the required number of participants by one for every successful participant graduating on or after October 21, 1998, thereby reducing the overall number of mandatory YCH participants. However, YCH will consider as large an FSS Program as staffing permits.

II. ELIGIBILITY/OUTREACH/SELECTION

Eligibility

Participants of the HCV Program are eligible to participate in the FSS Program. HCV participants porting into the jurisdiction are eligible to continue participation in the FSS Program or may begin participation.

YCH will not deny any family the opportunity to apply or participate in the FSS Program on the basis of race, color, national origin, religion, sex, familial status or handicap (disability). The YCH will not discriminate against other qualified persons because of their disabilities and, upon request, will make reasonable accommodation to allow participation in the

FSS Program. The YCH may decide that an accommodation is not reasonable if it causes undue financial and/or administrative burdens.

- - Attend a mandatory FSS orientation meeting;
 - Complete and submit the FSS application and FSS assessment in a timely manner;
 - Attend pre-selection interview and complete assessments or assignments to develop the Individual Training and Service Plan (ITSP);
 - Does not owe money to the YCH or any other public housing agency;
 - No violations of any HCV family obligations/regulations, including Housing Quality Standards;
 - Willing to pursue the goals of the FSS Program; and
 - Willing to enter into a contractual agreement with the YCH.

Outreach to Potential FSS Participants

Outreach efforts to minority and non-minority participants by the FSS Coordinator may include:

- direct mailing to all HCV participants
- briefings of new clients
- direct appeal to community groups and service providers
- direct appeal to current participants of HCV Programs
- posting of FSS information in YCH offices / website
- flyer circulation/distribution.

As needed, bilingual information will be available. HCV participants interested in the FSS Program will be provided information concerning the program and an invitation to attend a scheduled orientation session. Direct mailing and flyers are a vital part of outreach efforts; however, the most effective method is direct personal contact.

Families who do not decide to participate in the FSS Program will not be affected by their decision. They will retain all rights under the HCV Program.

Selection of Participants:

The FSS participants will be selected in accordance with the preferences (if any) and date the family submitted an application to participate in the FSS Program. A paper verification of the offering and acceptance/non-acceptance and the selection process will be maintained to ensure

families are selected without regard to race, color, religion, sex, handicap, family status, or national origin.

Preferences

YCH will give an FSS program selection preference for the following criteria:

- A preference will be given to incoming portable transfers with active FSS contracts and in good standing with their current public housing agency FSS program.
- A preference will be given to eligible families who have 1 or more family members currently enrolled in an FSS related service program through a community group or service provider (not to exceed 50% of program slots).
- Assisted HCV participants

Screening

Yolo County Housing will screen families for interest and motivation to participate in the FSS Program. The motivational factors that YCH may measure include:

- Attendance at FSS orientation sessions or pre-selection interviews,
- Assigning certain tasks, which indicate the family's willingness to undertake the obligations, which may be imposed by the FSS contract of participation.

Incentives

The main incentive offered to each FSS participant is the ability to build an escrow savings account during participation in the FSS Program. All escrow money earned shall be distributed to eligible FSS participants who have completed all goals outlined on ITSP and are cash assistance free at the time of Contract of Participation (COP) completion.

Other incentives, such as gift certificates, coupons, free items, etc. may be offered to clients for goal completion, financial need, etc. as available. There may be times when no other incentives are available as the items are procured only through donations from area businesses and companies. If businesses and companies fail to donate, incentives will not be available. YCH is not obligated to provide monetary or non-monetary incentives other than the escrow savings account.

III. STEPS IN THE SELF-SUFFICIENCY PROCESS

All interested persons may contact the FSS Coordinator to obtain information about the FSS Program. The FSS Coordinator will schedule interested clients for an orientation in order to screen families for interest and motivation to participate in the FSS Program.

Orientation Session:

The Head of the Household may be required to attend an orientation session. The orientation session will include presentations by the FSS Coordinator and other community partner organizations. Structure for the orientation session may be as follows:

- A. Welcome - Attendance is taken at the door. Guests are greeted on an informal basis.
- B. Program & FSS Coordinator Introduction - The coordinator will explain the main objective and procedures of the program in a power point presentation. Paperwork will be passed around explaining in detail how the program works and how to sign-up to participate in the program.
- C. Self-Assessment & Goal Setting Exercise - Ever mindful that self-esteem of the participants is of the utmost importance, the FSS Coordinator will facilitate an informal client self-assessment and goal setting exercise. Self exploration is critical in the quest for a self-sufficiency plan. These exercises can help stimulate clients to formulate thought about a broader variety of possibilities, and introduce the participant to a broad vocabulary of terms to describe their skills and positive traits. The orientation will also foster a feeling of independence, interdependence and mutual support for individuals who might typically otherwise feel isolated and alienated from others.
- D. Program Briefing - The FSS Coordinator will be prepared to address the following program information:
 1. The FSS Coordinator will explain that the FSS Program is a program to promote economic self-sufficiency among residents of federally assisted programs, involves a COP with YCH, and is for a five (5) year period, unless extended for good cause for an additional two-year period.
 2. The coordinator may review the FSS Brochure/Information Sheet, referral process to supportive services and when an FSS participant is considered a success.
 3. The coordinator will explain the Escrow Account as another incentive of the FSS Program.

- E. Question and Answer Session - The coordinator will allow for a question and answer session. The main objective of this session is to encourage the guests to ask questions to obtain clarifications.
- F. Application - The coordinator will review the basic content areas in the application for the FSS Program. The coordinator will ask the guests to fill out the application if they feel they are interested in becoming FSS Participants.

Handouts recommended for the orientation session are as follows:

- FSS Information Sheet/Brochure
- FSS Application
- FSS Orientation Acknowledge Form
- FSS Pre-Enrollment Information
- FSS Personal Needs Assessment

The applicant will be placed on a waiting list for the FSS program by the time and date of application submission and preferences (if any).

The applicant will be sent a paper verification of the acceptance to the FSS waiting list.

As slots become available in the FSS Program, the applicant will be scheduled for a follow-up appointment with the FSS Coordinator.

Program Eligibility

The YCH will not deny any family the opportunity to apply or participate in the FSS Program on the basis of race, color, national origin, religion, sex, familial status or handicap (disability). YCH will not discriminate against other qualified persons because of their disabilities and, upon request, will make reasonable accommodation to allow participation in the FSS program. YCH may decide that an accommodation is not reasonable if it causes undue financial and/or administrative burdens.

A family is eligible for participation when the following conditions are met:

- Attend a mandatory FSS orientation meeting;
- Complete and submit the FSS application and FSS assessment;
- Attend pre-selection interview and complete assessments or assignments to develop the ITSP;
- Does not owe money to YCH or any other public housing agency;

- No violations of any HCV family obligations/regulations, including Housing Quality Standards;
- Willing to pursue the goals of the FSS Program; and
- Willing to enter into a contractual agreement with YCH.

Families who decide not to participate in the FSS Program will not be affected by their decision. They will retain all rights under the HCV Program.

Denial of Participation in FSS

YCH may deny participation in the FSS Program for one or more of the following reasons:

- Family screened for motivational factors and determined to not have sufficient interest in FSS;
- Family previously participated in FSS and successfully completed the program;
- Family terminated from a previous FSS contract with cause;
- Family previously participated in FSS and terminated for non-compliance and/or failure to meet its FSS obligations;
- Family previously participated in FSS but did not meet its goals before expiration of the COP;
- Family owes money to YCH or any other public housing agency;
- Family is not currently in good standing with the YCH (in violation of the Family Obligations) including Housing Quality Standards (HQS);
- Portable family who is in non-compliance with the FSS obligations of the initial public housing agency;
- Portable family who fails to follow through by contacting YCH to transfer its FSS contract within the required period of time.

Families denied participation in the FSS program may request an Informal Hearing to determine whether the decision was made in accordance with HUD regulations and the guidelines in this plan. The request for an Informal Hearing must be made, in writing, within fifteen (15) business days of the date of notification of the decision to deny participation.

Admission to FSS Program

- A. Assessment - The first case session will include an in depth needs assessment which serves as the baseline for determining what services will be needed in support of the prospective participant.

- B. Individual Training and Services Plan (ITSP)- The FSS Coordinator will ensure that the needs of the FSS family identified are addressed and coordinated with available services in the ITSP. Resources in both public and private sectors are essential for the FSS Program. A network of service providers (focusing towards the participant's needs) is carefully identified and coordinated by the FSS Coordinator. The network of services not only allows for the exchange of timely information, but also provides the agency a system which prevents duplication of servicing activities. The participant's needs are matched and addressed with resources and documented in the case file.

The nature of the program necessitates that the families establish their own educational and employment goals. The ITSP will establish specific interim and final goals by which YCH may measure the family's progress toward fulfilling its obligations under the COP. To comply with the COP, the interim goals must lead to an income which will be above the entitlement levels for government assistance (only cash maintenance payments) by the end of the year prior to the expiration of the COP.

- C. Contract of Participation (COP)- After the service plan is completed, a COP is completed by the FSS Coordinator, signed and agreed to by the Head of the Household of the participating family. The five (5)-year period begins when the COP is signed, obligating the family to follow the ITSP. Should the COP be signed and dated other than the first of the month, the contract becomes effective the first of the following month.

The COP must be executed no more than one hundred twenty (120) days after the household's most recent annual or interim reexamination. The COP will list:

1. The family's current annual income,
2. The amount of earned income, included in the annual income, and
3. Thirty percent (30%) of the family's adjusted monthly income when the family begins its FSS participation.

The COP, which incorporates the ITSP, will set forth:

- The principal terms and conditions governing participation in the FSS program including the rights and responsibilities of the FSS family and YCH.
- The services to be provided to, and the activities to be completed by the head of the FSS family and each adult

member of the family who elects to participate in the program.

- The obligations of the FSS family to comply with the lease terms and conditions of the HCV lease.
- The obligation to seek and maintain suitable employment.
- The consequences of noncompliance with the COP.

D. Extensions- A contract extension of the COP, not to exceed two (2) years, must be requested by the FSS participant in writing for “good cause” prior to the expiration of the contract and must provide a verification/documentation of the circumstances. Failure to provide supporting documentation within the required time period will be cause for denial of the contract extension and the contract will be terminated. Examples of “good cause” are as follows and will be granted on a case by case basis with the Housing Administrator’s written approval:

- Serious illness that prevents the FSS head of household from completing his/her goals.
- Incomplete job training or education goal(s) in which the family is currently enrolled.
- Involuntary loss of employment by FSS head of household.
- To allow families to meet the interim goal of independence from welfare (cash assistance) for twelve (12) consecutive months before expiration of the COP.

Families denied a contract extension may request an informal hearing to determine whether the decision was made in accordance with HUD regulations and the guidelines of this plan. The request for an informal hearing must be made, in writing, within fifteen (15) business days of the date of notification of the decision to deny the extension.

E. Remaining Family Members- If the designated head of household becomes medically ill or ceases to reside with other members of the participating family who continue to receive assistance under the FSS Program, the remaining family members shall have the right to request another family member as head of household for FSS purposes. YCH must approve the family’s request and the COP must be revised to designate the new head of household who must be at least eighteen (18) years of age and seek and maintain employment.

IV. FSS COORDINATOR REVIEWS & UPDATES OF SELF-SUFFICIENCY PLANS

Even though a great amount of time and effort is invested during the application and assessment steps, a critical component is a trusting long-term relationship between the FSS Coordinator and the FSS participant. Documentation of client progress will be completed monthly with each participant. The monthly review/update may be conducted in person, by mail, and/or over the telephone. However, an annual review must be conducted by the FSS Coordinator in person with the Head of the FSS family and all other family participants. The purpose of the review is to evaluate the progress made toward the goals set by each participant. Failure to meet goals, and comply with YCH rules and regulations may result in termination of the FSS COP, loss of FSS escrow, and in some cases, housing assistance.

Updates to the case status will be documented on the FSS Case Narrative as necessary.

Key elements in case coordination are as follows:

- Advocacy, reassuring the effectiveness of the FSS Program
- Technical Assistance, providing guidance and resource information
- Supportive Counseling
- Monitoring progress and activities
- Re-evaluating, reviewing and possible revision of goals

V. SUPPORTIVE SERVICES

This section is a certification of coordination, as possible, with the Department of Social Services, first-time homebuyer programs of Yolo County, and other support service programs. Recognizing that YCH is funded primarily for housing assistance, community agencies are the primary source of supportive services to FSS clients. YCH's FSS Coordinator identifies and coordinates services for clients through a wide variety of agencies to address the needs of participants, to include education, job training, parenting, higher education, budgeting, homeownership, etc. The FSS Coordinator shall conduct briefings as needed to public and private agencies within the local community, in an effort to develop/strengthen a network of supportive services for the FSS Program in order to continue to improve and expand the network of resources.

Child Care

The FSS Program does not offer any direct child care assistance, but may refer participants to programs that may offer child care assistance.

Transportation

Transportation assistance will not be offered through the FSS Program. However transportation assistance may be provided through the specific program that the participant is enrolled in, depending on the program. Local bus schedules will be available and provided to the participants who need a form of transportation.

Education

Coordination geared toward completion of secondary and/or post secondary education is important for FSS families who identify this as being one of their goals. The FSS Coordinator will encourage the participants to apply for financial aid at local community colleges and universities in order to support the family to attend college.

There are various agencies in the community that do offer different remedial education such as English Language Development (ELD) and Graduation Equivalent Degree (GED). Each case will vary, depending upon the needs of the participant.

Job Training, Preparation, and Counseling

FSS Participants are referred for employment and training services to various community agencies. The FSS Coordinator will build a strong working relationship with the Yolo County Department of Social Services to follow-up on the progress of FSS participants in different supportive service programs; and seek advice and information on service opportunities for the FSS participants.

Money Management Training

Issues pertaining to personal finances are addressed at various levels within the program process. The FSS Coordinator may meet with each family to identify a potential need for financial counseling and make necessary referrals. Websites and free on-line resources may also be identified that help families budget their expenses each month.

Homeownership Counseling and HCV Program

Information may be given to the FSS participants about different home ownership programs, such as the YCH Homeownership Program. The FSS Coordinator will also work with local affordable housing programs and local governments in Yolo County to provide homeownership information for program participants including the First-Time Homebuyer Program (FTHB).

Family Violence

Referrals may be made to various community agencies for counseling and support services for child, adolescent, and adult victims of family violence. Additionally, these agencies may provide temporary shelter, legal advocacy, financial referrals, and job training programs for victims of family violence.

Substance Abuse Treatment and Counseling

FSS Program participants in need of substance abuse treatment and counseling may be serviced through various community agencies. Renewed substance abuse will be considered negative progress toward achieving self-sufficiency, and the family will need to redefine the steps to achieve self-sufficiency if they are found to regress on substance abuse or they are found to renew an addiction or abuse of a substance (e.g. alcohol, illegal drugs).

Homemaking & Parenting Skills Training

FSS participants are assisted through various community agencies. Follow-up on the participant's progress will be conducted by the FSS Coordinator. A strong network of services and/or servicing action will be established.

Mentoring

The FSS Coordinator will conduct the mentoring process and make referrals to local programs as available. Community leaders, professionals, and former FSS graduates may also be identified as potential speakers for FSS workshops.

Personal Growth Self-Esteem

FSS Coordinator will develop workshops with speakers from various community agencies. Police officers; community leaders; graduates from alcoholics anonymous, to name a few, will be invited to speak to the FSS participants at the time of their briefing into the program. These speakers will serve to motivate the FSS participants to work toward their goals.

VI. CASE COORDINATION

FSS Coordinator and/or partnering agencies provide the following types of services to FSS participants:

- A set of logical steps and a process of interaction is established, ensuring that FSS participants are informed of needed services in a supportive, efficient, and cost-efficient manner.
- FSS Coordinator may coordinate a range of resources, assuring accountability, and continuity of care, accessibility, and efficiency. Action is also taken to ensure that clients are kept informed of other pertinent services, treatment, care and other opportunities or services to which they may be entitled.
- The FSS Coordinator has responsibility for service planning and system coordination with the participant family, on an on-going basis to develop the following:
 - An appropriate service plan
 - Assure access to services
 - Monitor service delivery
 - Advocate for client needs
 - Evaluate service outcomes

VII. COMPLETION/TERMINATION FROM THE FSS PROGRAM

Completion of the FSS Program

Completion of the FSS Program is when participants graduate. Graduation is achieved when either:

1) The family has fulfilled all of its responsibilities under the COP and the head of the FSS family provides written proof that no family members receive welfare assistance and has not received welfare assistance for the past twelve (12) consecutive months (written verification is required). Welfare assistance, for the FSS program, means income assistance from Federal or state welfare programs, and includes only cash maintenance payments designed to meet a family's ongoing basic needs.

OR

2) Thirty percent (30%) of the family's monthly income meets or exceeds the Fair Market Rent as established by HUD for the family's qualified bedroom size.

When either of these conditions is present, the family is relieved of all requirements of their FSS COP. At this point, the participant is considered to have successfully completed the FSS program requirements and will be graduated from the FSS Program.

Termination from the FSS Program

The COP is automatically terminated if the family's HCV assistance is terminated in accordance with HUD requirements.

In addition to YCH procedures covering termination from the HCV Program, the COP may be terminated before the expiration of the contract term by:

1. Mutual consent of the YCH and FSS participant;
2. FSS participant's failure to meet its obligations outlined in the COP;
3. The FSS family's withdrawal from the FSS program;
4. Such other act as is deemed inconsistent with the purpose of the FSS Program; or
5. Operation of law.

Failure to Meet Goals

In the event that an FSS participant fails to meet educational and/or employment goals in the FSS COP, the following steps may be taken:

STEP 1 - The FSS Coordinator will conduct a personal interview with the FSS participant to determine the nature of the barrier. If the Coordinator determines that the barrier is beyond the participant's control; a revised service plan will be written with the goal remaining economic self-sufficiency. However, if in the opinion of the FSS Coordinator the barrier rests within the control of the participant, the participant's case, along with an applicable written summary and recommendation, may be referred to the Housing Administrator for review. After approval by the Housing Administrator, the files, including the recommendation, may be documented in the FSS file and appropriate changes made.

STEP 2 – If the FSS participant disagrees with the recommendation, the participant may request an informal hearing within fifteen (15) calendar days under the appeal process outlined in YCH's Grievance Procedure.

VIII. FSS PROGRAM COORDINATING COMMITTEE

The FSS Program Coordinating Committee (PCC) will advise and assist in developing the Action Plan and obtaining needed resources to implement the FSS program.

The FSS PCC will include YCH representatives and HCV residents. It will also include representatives of agencies that provide needed services and/or other resources.

IX. ESCROW ACCOUNT

The general concept of the escrow account is that FSS families accrue funds and continue to pay rent in accordance with their income changes. For escrow to accrue, the current family Total Tenant Payment (TTP) must be greater than the family TTP when the FSS COP was executed due to an increase in earned income by the FSS participants. The amount of funds escrowed for the family will be affected by incremental increases in the family income.

Income and rent calculation

The family's annual income, earned income, and TTP are inserted into the COP at execution. These are the baseline figures for future escrow calculations.

The figures may be taken from the amounts on the last reexamination or interim determination before the family's initial participation in the FSS Program, unless more than one hundred twenty (120) days will pass between the effective date of the reexamination and the effective date of the contract. YCH will conduct a new reexamination if it is more than one hundred twenty (120) days.

If the family's earned income increases, YCH compares the TTP to the baseline TTP and, in most cases, the difference is escrowed.

Calculating the Escrow Credit

After the effective date of the COP, an escrow credit calculation will be made on the Escrow Credit Worksheet. This will establish the "base" from which the family will begin. For every annual or interim reexamination the escrow will be calculated and the FSS Coordinator will record the information on the FSS CLIENT LIST SPREADSHEET, under the appropriate columns.

Impact of the Income Limits for Admission

- The monthly escrow credit will be different depending on whether the annual income for the family falls within YCH's adopted very-low-income limits for admission or low-income limits for admission.
- For housing program eligibility purposes, the gross annual income is compared to the income limit. For FSS escrow calculation purposes, the adjusted annual income is compared to the income limit.
- For very-low income families, the amount to be escrowed is the lesser of:
 - Difference between thirty percent (30%) of current monthly adjusted income and the family rent adjusted to exclude increases in earned income;
 - Difference between current TTP and the TTP on the effective date of the FSS COP.
- When the adjusted income exceeds the very-low income limit, thirty percent (30%) of the amount by which the adjusted income exceeds the very-low income limit is deducted from the estimated credit. The remainder is the family's actual escrow credit.
- For families over the low-income limit, there will be no FSS credit.
- No additional credits will be made to the family's FSS account when the FSS family has completed the COP or when the COP is terminated or otherwise nullified.
- A lower percentage of the earned income may be credited to the escrow account if:

- Adult family members are added to the household or if a child turns eighteen (18) after execution of the COP;
- The additional earned income increases the family's total income above the very low-income limits.

It is critical that the correct income limits (Low and Very Low) for the current family size is entered on the escrow worksheet.

Timing of the Credit Calculation

The base for the family is established by the FSS Coordinator at the time the family signs the COP for the FSS Program. The Coordinator must calculate monthly escrow credit thereafter whenever there are annual or interim reexaminations. If the family has one or more interim reexaminations during the year, the monthly escrow amount may change during the year. Otherwise, the monthly escrow credit will be the same for the entire period between reexaminations.

Procedures for Reporting Escrow Balances/Changes to Finance Staff

At the end of each month, after all changes have been made to the FSS Client List (to include changes to escrow accounts), the FSS Coordinator will ask the Housing Administrator for approval, and copy the Finance staff.

Finance staff will determine the changes by identifying in columns titled "Escrow Begin/Month/Year" (this column will have the month the escrow starts, or the month of the change), "Escrow End/Month/Year" (this column will have the month in which the escrow ends), "Total Number of Months" (this column will be the total number of months that is used to figure the amount of escrow), "Monthly Escrow" (this will show the amount of escrow per month that should be credited), "Sub-Total" (This should be the number of months (x) the monthly escrow amount), "Interest Payment" (to be figured by Finance Staff). "Total" (this amount will be the Sub-Total plus any interest payment), Columns "O" (Account Withdrawal), "P" (Date Withdrawal) "G" (Reason for Withdrawal), will be used only when a participant has withdrawn money from their escrow account. Column "R" (Account Balance) will be the amount of the escrow balance, after any withdrawals have been made.

Escrow Fund Deposits and Investments

YCH is required to deposit the escrow funds calculated into a depository account to be held for the family. These funds will come from the reduced HAP amounts which are transferred to the escrow account.

Crediting the Escrow Account

YCH will deposit all escrowed funds into a single depository account for the FSS Program. This is so that the Internal Revenue Services (IRS) will not count the funds or interest on the funds in the escrow account as income for purposes of income tax, either before or when the family actually receives the escrow. YCH credits the account once annually. The FSS worksheet credit calculations are added for the twelve (12) month period and YCH then makes one (1) adjustment. If YCH finds that a family did not report income they were required to report, YCH will not credit the family's escrow account with any retroactive portion.

Interest on the FSS Escrow Account

Before applying the interest, YCH must check to see if the family owes rent or other amounts due to YCH.

If the family owes any amount, YCH will reduce the balance in the account by the amount owed.

Reporting of the FSS Escrow Account

YCH will make a report on the status of the Escrow Account, a minimum of once per year to the FSS family.

The report will include the following:

- The balance at the beginning of the reporting period;
- The amount of the family's rent payment that was credited to the FSS Account during the reporting period;
- Any deductions/disbursements made from the account for amounts due to YCH before interest is distributed;
- The amount of interest earned on the account during the year; and
- The total in the account at the end of the reporting period.

Disbursement of the FSS Escrow Account

The FSS Coordinator shall review the case and determine if the FSS participant has completed the COP. The FSS Coordinator shall prepare a recommendation for release of escrow account funds for each FSS participant that has successfully completed the FSS program.

Prior to disbursement of any FSS Escrow funds, the FSS file and the tenant file will be sent to a supervisor for review and approval. The files must contain a written request from the family for the escrow funds, the required verifications of income, government assistance, a written

recommendation by the FSS Coordinator and a completed FSS Escrow Account Status.

The family may use the final disbursement of escrow account funds for ANY purpose. The amount in an FSS account, in excess of any amount owed to YCH by the FSS family, is paid to the head of the FSS family when any of the following occur:

- Whenever thirty percent (30%) of the family's monthly adjusted income equals or exceeds the existing housing Fair Market Rent for the Certificate or Voucher size issued in Section 8 (even if the five year term of contract has not lapsed);
- When the COP has been completed, and the head of the FSS family submits to YCH a certification that, to the best of his/her knowledge and belief, no member of the FSS family is a recipient of welfare assistance.

Interim Disbursements

YCH may, at its sole option, disburse a portion of the funds from the escrow account during the COP period for CONTRACT RELATED EXPENSES if the family:

- Has fulfilled certain interim contract goals;
- Needs a portion of the FSS account funds for purposes consistent with the COP, such as school tuition, job training, business start-up expenses, auto (when public transportation is unavailable or inaccessible to the family) or homeownership.

YCH will not release an interim disbursement of funds from the Escrow Account unless the funds are withdrawn to aid in the completion of an interim goal. However, any interim disbursement paid to an FSS family must be repaid to YCH if the payment was based on fraud or misinformation by the participating FSS family.

Interim disbursements are requested in the same manner as final payments. The FSS file and tenant file must be sent to the Housing Administrator for review. The files should contain a written request from the FSS family with verification from the vendor showing actual costs for interim disbursement along with a written recommendation from the FSS Coordinator and a current Escrow Account Status. If disbursement is approved, the FSS family must send the FSS Coordinator a receipt/receipts to verify payment was made.

Change in Family Composition

If the Head of the FSS family no longer resides with other family members in the unit, the remaining members of the FSS family, after consultation with YCH, will have the right to designate another adult family member who is on the lease agreement to receive the funds. If the head of household marries, household income increases and the new Total Tenant Payment (TTP) equals or exceeds the Section 8 existing Fair Market Rent (FMR), the FSS family is entitled to the escrow and is deemed a graduate of the FSS Program.

If the FSS family with two (2) adults separate and YCH determines that the escrow should be paid to the FSS family, it may be paid to the family member continuing to reside in the unit, retaining the voucher assistance. Also, if the family member was not designated as head of the FSS family, he/she must now designate himself/herself as head of the FSS family in order to receive the escrow.

Forfeiting the Escrow Account

Amounts in the FSS account shall be forfeited if any of the following occur:

- The COP is terminated;
- The COP is completed by the family, but the FSS family is receiving welfare assistance at the time of expiration of the term COP, including any extension thereof.

If the head of the FSS family dies and the remaining members of the FSS family choose not to continue participating in the FSS Program and the COP obligations have not been met, the escrow funds shall be forfeited. If the family does not abide by program regulations, the funds may be forfeited for any of the following:

- Failure to comply with any of the family obligations or the COP;

X. PROCEDURES FOR COMPLAINTS/HEARINGS

1. The FSS Participant will receive a written notice of the decision of adverse action within fifteen (15) calendar days from the date of decision.
2. The notice shall contain a brief statement of the reason(s) for the decision.
3. The FSS Participant may submit a written request to Yolo County Housing within fifteen (15) calendar days from the date of the notice, requesting an informal hearing.

4. Yolo County Housing shall designate any person(s) as the review officer(s). The person(s) designated as the review officer(s) shall not be the person who made or approved the decision under review or a subordinate of such person.
5. The proceedings of the review shall be informal and confined to factors relating to the FSS Program and to decide whether a decision of adverse action is justified.
6. Yolo County Housing shall notify the participant of the date, the time, and the place of conducting the informal review at least one (1) week prior to the date of the review.
7. The FSS Participant shall have the right to present his/her objections either orally or in writing.

The Decision

1. The review officer(s) shall decide whether the decision of adverse action to the FSS Participant was justified and in accordance with federal regulations and the Action Plan of Yolo County Housing. This final decision shall be given within fifteen (15) calendar days from the date of review.
2. Yolo County Housing shall promptly notify the participant in writing of the final decision, and a brief statement of the reasons for the final decision. In no case shall the decision take more than fifteen (15) calendar days.

Terms and Definitions

Welfare Assistance: Monetary assistance as defined by 24 CFR 984.103, cash maintenance payments provided through the Federal and State welfare programs.

Client(s): Family and/or individual participating in the FSS program.

Contract of Participation (COP): A contract in a form approved by HUD, entered into between a participating family and a PHA operating an FSS program that sets forth the terms and conditions governing participation in the FSS program. The contract of participation includes all individual training and services plans entered into between the PHA and all members of the family who will participate in the FSS program, and which plans are attached to the contract of participation as exhibits.

Escrow Account: Under the terms of the COP, clients may have deposits made into an escrow account, operated and maintained by YCH. Clients may be eligible for deposit(s) into the account under guidelines set forth in the COP and HUD's FSS Escrow Account Credit Worksheet (currently HUD Form 52652). There will be one interest bearing Escrow Account established in which each eligible client, and his/her deposits and calculated interest, will be a sub-line item.

Goal(s): A goal listed within client's ITSP.

Head of Household: The adult member of each FSS family that is considered head of household for eligibility and rent calculation determinations.

Individual Training and Service Plan (ITSP): Part of the COP, HUD Form 52650, final and interim goal sheets. A written plan prepared in cooperation with each adult individual, who wishes to participate, in client family that designates personal and professional goals to be accomplished by the client before the ending date of the COP. The ITSP is part of the COP.

Participant(s): Persons and/or families that are currently and actively receiving Section 8 Assistance within YCH jurisdiction under the Housing Choice Voucher Program.

Seeking Employment: Actively conducting a job search by completing and submitting job applications and resumes, and participating in job interviews; following through with employment opportunities in general.

Suitable Employment: Employment obtained and maintained by client that will allow independence from Cash Assistance.