

**THE
FAMILY
SELF-SUFFICIENCY
PROGRAM
ACTION PLAN**

**Revised 9/30/22
Amended 11/20/2024**

**GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
RENTAL ASSISTANCE DIVISION
60 EXECUTIVE PARK SOUTH
ATLANTA, GEORGIA 30329**

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I. INTRODUCTION

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by the Georgia Department of Community Affairs (DCA). It was submitted to HUD on September 30, 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 DCA'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 Georgia Department of Community Affairs' personnel policy and Agency Plan.

II. PROGRAM OBJECTIVES

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

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

III. PROGRAM SIZE AND CHARACTERICS

III.A – Family Demographics

These tables describe the demographics of the population expected to be served by DCA’s Action Plan.

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.*) (VASH)
- Section 8 Moderate Rehabilitation
- Project-Based Rental Assistance (PBRA)
- Other Program

Ages of Head of Household and Other Adults

	Percent
Ages of Head of Household	
--Head of Household is age 24 years or younger	.7%
--Head of Household is age 25 to 50	58%
--Head of Household is age 51 to 61	19%
--Head of Household is age 62 or greater	22%
Ages of Other Adults in Household	
-- Age 24 years or younger	90%
-- Age 25 to 50	8%
-- Age 51 to 61	1%
-- Age 62 or greater	1%

Presence and Ages of Children

	Percent
Presence and Ages of Children	
--Households that only include adults over age 18	37%
--Households that include one or more child age 13-17	34%
--Households that include children who are all 12 or younger	36%

Employment Status of Population to be Served

	Percent
Employment Status of Head of Household	
--Families with an employed head	34%
--Families whose head is unemployed	66%
Employment Status of All family members	
--Families with any member that is employed	8%
--Families with no employed member	92%

Annual Earned Income of Population to be Served

	Percent
Annual household earnings <\$5,000 per year	8%
Annual household earnings between \$5,000 and \$9,999	12%
Annual household earnings between \$10,000 and \$14,999	14%
Annual household earnings between \$15,000 and \$19,999	13%
Annual household earnings between \$20,000 and \$24,999	11%
Annual household earnings between \$25,000 and \$29,999	9%
Annual household earnings between \$30,000 and \$34,999	7%
Annual household earnings of \$35,000 or higher	10%

Elderly/Disability Status of Population to be Served

	Percent
Elderly/Disability Status of Head of Household	
--Head of Household is an elderly person without disabilities	4%
--Head of Household is an elderly person with disabilities	18%
--Head of Household is a non-elderly person without disabilities	59%
--Head of Household is neither an elderly person nor a person with disabilities	59%
Elderly/Disability Status of All Household members	
--Household includes an elderly person without disabilities	8%
--Household includes an elderly person with disabilities	1%
--Household includes a non-elderly person with disabilities	11%
--Household includes no elderly persons or persons with disabilities	62%

Race and Ethnicity of Population to be Served (required)

Race		Non-Hispanic	Hispanic
White	11%	84%	16%
Black or African-American	88%	99%	1%
American Indian or Alaska Native	.1%	86%	14%
Asian	.5%	100%	0%
Native Hawaiian or other Pacific Islander	.1%	56%	44%
Other Race	1%	81%	19%

III.B – Supportive Services Needs

The following is a list of the supportive service needs of the families expected to enroll in the DCA’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 child care
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Access to counseling or treatment for substance abuse and mental health
- Dental care, health 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
- Other: _____

III.C. – Estimate of Participating Families

Over time, DCA 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. New families will be admitted to the FSS program as space permits.

Historically, DCA’s FSS program has enrolled 25 new families into the FSS program each year. Accordingly, DCA expects to be able to provide FSS Services to 125 families over a five-year period.

Minimum Program Size. In accordance with CFR §984.105, DCA has a remaining FSS program mandate to serve 135 families. This is calculated based on the table below. This is our best estimate at this time, and it includes the mandate for the HCV program and counts graduates.

Original Number of Participants Mandated in HCV	FSS Graduates	Remaining Mandatory Slots
<u>500</u>	<u>365</u>	<u>135</u>

Therefore, as of the time of preparation of this Action Plan, DCA expects to be able to serve 130 families in the FSS program at any one time.

DCA FSS Offices shall be as follows:

FSS Office

FSS Counties

Atlanta

Carroll, Clarke, Douglas, Gwinnett, Henry, Cherokee, Newton, Paulding, and Rockdale

Waycross

Camden, Dougherty, Houston, Laurens, Liberty, Lowndes, and Ware

Presently, DCA administers FSS in at least one county per region. In selecting FSS counties, DCA considers the demographic profile of Housing Choice Voucher families in the region and its counties, the availability of existing support services that may be utilized by FSS participants, and the specific needs of potential FSS participants. DCA may consider applications for FSS from participants in adjoining counties. The FSS Coordinator shall review the request for participation in a non-adjoining county. A FSS program may not be offered in a county that offers few supportive services or for which existing Housing Choice Voucher families have shown minimal interest.

III.D – Other Self-Sufficiency Programs

DCA 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 type="checkbox"/>	
Jobs Plus	<input type="checkbox"/>	
Emergency Housing Voucher (EHV)	<input checked="" type="checkbox"/>	10
Veterans Affairs Supportive Housing (VASH)	<input type="checkbox"/>	
Other:	<input type="checkbox"/>	

IV. 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 will be selected based on the following selection method:

<u>Selection Method</u>	<u>Check applicable method</u>
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

DCA will not use any motivational screening factors to measure a family's interest and motivation to participate in the FSS program.

D. Compliance with nondiscrimination policies

It is the policy of DCA 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, DCA'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 coordinators will review the file in the staff review meeting to ensure that non-selection is not based on discriminatory factors before the final decision is made. Applicants will be notified in writing of the reason(s) they were not selected for participation and will have the opportunity to appeal the decision (see Hearing Procedures). At all times, DCA 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 DCA's FSS program:

- FSS program graduates
- FSS participants who have withdrawn voluntarily
- Families terminated with escrow disbursement
- Families involuntarily terminated
- Family members who were not Heads of FSS Family previously
- No member of previously enrolled families may re-enroll

The following conditions apply to re-enrollment:

Incompletion

DCA will not refuse to select a family for participation in the FSS program a second time if that family previously participated, did not complete the obligations of the executed CoP, and/or did not violate the FSS Action Plan and HUD Guidelines and Regulations.

Graduation

- Acceptance of enrollment for the second time for previous FSS Participants in the FSS program will be based on:
 - A case-by-case basis,
 - Completed the CoP,
 - Received less than \$10,000 in escrow, and
 - Their employment skills or wages are below the level needed to achieve economic self-sufficiency.
- The family wishing to participate in the FSS program a second time must wait at least three (3) months after graduation and will be service in the order of application date.

F. Head of FSS Family

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

- Writing
- A form developed by DCA
- Other

V. OUTREACH

DCA 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 <i>DCA</i> 's website	FSS description and requirements are posted at www.dca.ga.gov
<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	FSS brochures may be included in the recertification packets mailed monthly to participants.
<input checked="" type="checkbox"/> Providing information about the FSS program at voucher orientation sessions	FSS brochures may be included in the new admission packets mailed to applicants when reaching the top of the wait list.
<input type="checkbox"/> Holding well-publicized information sessions about FSS	
<input type="checkbox"/> Providing information about the FSS program to eligible families by mail	
<input checked="" type="checkbox"/> Facebook	Outreach information posted @GeorgiaDCA
<input checked="" type="checkbox"/> Twitter	Outreach information posted @GA_DCA
<input checked="" type="checkbox"/> Instagram	Outreach information posted @ga_dca
<input checked="" type="checkbox"/> Other <i>LinkedIn</i>	

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, DCA 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.

VI. 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, as well as any additional incentives offered by DCA are described below.

A. Additional Incentives

The DCA's FSS program provides the following incentives to FSS participants in addition to the FSS escrow account;

B. Interim Disbursements

Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP). Requests may be made verbally or in writing. Requests may be made through the term of the Contract of Participation. 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. A determination of whether the family qualifies for the requested interim disbursement will be made on a case-by-case basis by the FSS Coordinator and an administrative staff representative of DCA. 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.

C. Uses of Forfeited Escrow Funds

Forfeited escrow funds remaining from terminated participants will be collected in a general fund and may be disbursed evenly among participants in good standing on a regular basis.

VII. 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 coaches 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"/> Disability Other specialized assessments	Adult Education Community, College Community Based Organizations, and Health Department
<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	Georgia Division of Family & Children services Temporary Assistance for Needy Families (TANF) program. Local Park, Recreation, and Library systems.
<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Bus passes <input type="checkbox"/> Assistance with car repairs <input type="checkbox"/> Assistance with car purchase	Local transit systems
<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	Local basic skills education programs, community colleges, four- year colleges, job training programs, employment services, programs funded through the Supplemental Nutrition Assistance Program Employment and Training program.
<input checked="" type="checkbox"/> Skills Training	<input 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	Adult Education, Community College, Workforce Innovation/American Job Centers and University Community-based organizations.

	<input type="checkbox"/> Apprenticeships <input checked="" type="checkbox"/> Skilled Labor training	
<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	Workforce Development Boards, Adult Education, Community College, Workforce Innovation/American Job Centers, and University Community-based organizations.
<input checked="" type="checkbox"/> Micro and Small Business Development	<input checked="" type="checkbox"/> Small business development services <input checked="" type="checkbox"/> Small business Mentoring <input checked="" type="checkbox"/> Entrepreneurship Training	Small Business Administration Business Incubator
<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	Community clinic, general hospital, health care agency, and social services agency.
<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	Georgia Crisis and Access Line and Domestic Violence shelters
<input checked="" type="checkbox"/> Child/Adult Protective Services	<input checked="" type="checkbox"/> Needs Assessment <input checked="" type="checkbox"/> Case Planning <input type="checkbox"/> Information Referral	Senior Services- Office on Aging Adult Protective Services, In-Home Supportive Services, and Social Services Agency
<input type="checkbox"/> Household Management	<input type="checkbox"/> Training in Household Management	
<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	Financial education and credit counseling providers, asset-building non-profit organizations, homeownership counseling providers, and

		banks and credit unions.
<input checked="" type="checkbox"/> Financial Empowerment	<input checked="" type="checkbox"/> Financial education <input checked="" type="checkbox"/> Financial coaching <input checked="" type="checkbox"/> Banking services <input type="checkbox"/> Training in money management	Financial education and credit counseling providers, asset-building non-profit organizations, homeownership counseling providers, and banks and credit unions.
<input type="checkbox"/> Individual Development Accounts	<input type="checkbox"/> Matched Savings Accounts	
<input checked="" type="checkbox"/> Legal Services	<input checked="" type="checkbox"/> Legal Services	Legal Aid
<input checked="" type="checkbox"/> Debt Resolution & Credit Repair	<input checked="" type="checkbox"/> Assistance negotiating the resolution of past-due debt	Consumer Credit Counseling Services
<input type="checkbox"/> Other:		

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

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

B. Delivering Appropriate Support Services

Coaching. 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.

DCA's FSS case managers will actively work with participants to identify services or employment training opportunities, make referrals to those resources, and provide ongoing support to help the participant achieve the goals which have been laid out in the ITSP.

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, DCA 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.

IX. 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 DCA's 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 DCA's 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 DCA 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, DCA 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 DCA, 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. DCA 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 DCA, 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 DCA or
- (iii) Any other circumstances that DCA determines warrants an extension, including allowing the family to meet the interim goal of remaining off welfare assistance at the time of Contract completion.

E. Completion of 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. DCA will accept the following form of verification for completion of the ITSP goals:

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

F. Modification

DCA 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 DCA as well as the Head of FSS Family.

DCA 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 DCA, 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:

DCA will allow modifications at any time during the term of the CoP

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).

X. PROGRAM TERMINATION, WITHHOLDING OF SERVICES, AND AVAILABLE GRIEVANCE PROCEDURES

A. Involuntary Termination

DCA 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 DCA 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 DCA 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 DCA 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

DCA's PHA Plan details DCA's Grievance Procedures (See Part III: Informal Reviews and Hearings, p.16-7)

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 *DCA* within 24 hours of the scheduled hearing date, excluding weekends and holidays. *DCA* 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. *DCA* 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.

XI. 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 *DCA's* decision of whether to admit the family into the *Housing Choice Voucher* program. The family's housing assistance will not be terminated based on whether they decide to participate in FSS, their successful completion of the CoP, or on their failure to comply with FSS program requirements.

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

XII. TIMETABLE

DCA implemented its FSS program in 1998 and will continue to implement it per this FSS Action Plan.

XIII. REASONABLE ACCOMODATIONS, 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.dca.ga.gov.

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.dca.ga.gov.

Limited English Proficiency

DCA 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.dca.ga.gov.

XIV. COORDINATION OF SERVICES

A. Certification of Coordination

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

B. Program Coordinating Committee

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

The PCC will meet twice a year and may conduct business on an as-needed basis via email or telephone conferences. The PCC includes the following representatives:

1. One or more FSS Program Coordinators
2. One or more participants from each HUD rental assistance program served by the FSS program.
3. Representatives from a variety of agencies and individuals, which include but are not limited to the following:

DCA has selected in all counties to use the Family Connection Committees.

XV. FSS PORTABILITY

A. Termination with Escrow Disbursement

FSS participants may not exercise portability within the initial 12 months after signing a CoP.

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 DCA's FSS program unless DCA 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 DCA is able to receive an incoming family from another jurisdiction into the FSS program, DCA 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, DCA 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, DCA 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.

XVI. OTHER POLICES

Policy	Where Addressed in Plan
(i) Policies related to the modification of goals in the ITSP;	Section IX Contract of Participation
(ii) The circumstances in which an extension of the Contract of Participation may be granted	Section IX: Contract of Participation
(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any)	Section VI: FSS Escrow Account and Other Incentives for Participants
(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing	Section VI: 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 IV. Family Selection Procedures
(vi) Policies on requirements for documentation for goal completion;	Section IX: Contract of Participation
(vii) Policies on documentation of the household’s designation of the “Head of FSS Household;	Section IV. Family Selection Procedures
(viii) Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference)	Section IV: Family Selection Procedures

XVII. 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 DCA, as may be required under this part, and which:

- (1) Shall be maintained by DCA 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, DCA, and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or DCA 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 DCA 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 DCA 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 DCA.

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

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 DCA 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 DCA 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 DCA 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.