

# Summary of Revisions to FY2021-22 Family Self-Sufficiency (FSS) Action Plan

Indicates policy has been added

~~Indicates policy has been removed~~

## About this Revision Summary

The proposed FY21-22 FSS Action Plan includes numerous updates to the structure and formatting of FSS Program policies in accordance with federal regulations and recommendations by the U.S. Department of Housing and Urban Development (HUD.) This revision summary is different from SAHA's summaries for the Admissions & Continued Occupancy Policy (ACOP) and the Administrative Plan (Admin Plan) because the FSS Action Plan was not previously included in the updates to the annual Moving To Work (MTW) Plan.

The proposed FY21-22 FSS Action Plan does not include substantive or material changes to current FSS Program administration or policies. This revision summary provides the key policies from the longer and more detailed Action Plan. Please note that all included SAHA language is in red, underlined text, which is subject to changes resulting from public comment. The complete document is available on the SAHA website for review and for public comment.

## Reason for the Change to the MTW Plan

Although not required to do so by federal regulations, SAHA proposed adding the FSS Action Plan to the MTW Plan beginning July 1, 2021 pending final HUD approval. The Action Plan was added to clarify that SAHA will provide any updates on the FSS Program through the MTW Plan's public comment process. In accordance with federal regulations and FSS grant requirements, SAHA will also continue to follow its revision process as stated within the FSS Action Plan.

The Action Plan was proposed as an amendment to the MTW Plan to clarify that SAHA will seek out and incorporate public input into any changes to the FSS Program moving forward. This addition to the MTW Plan will further SAHA's efforts to encourage transparency and engagement in the policymaking process by including a major resident services program within SAHA's annual policy updates. Additionally, these changes are being proposed to make the FSS Program more accessible and responsive to SAHA residents, our community partners and the public at large.



## Overview of the FY21-22 FSS Action Plan

Language was updated within the proposed Action Plan and the Table of Contents to include the following:

- [Cover Letter](#)
- [Chapter 1: Overview of the Program and Plan](#)
- [Chapter 2: Purpose, Scope & Applicability of the FSS Program](#)
- [Chapter 3: Program Administration](#)
- [Chapter 4: Selecting and Serving FSS Families](#)
- [Chapter 5: Contract of Participation](#)
- [Chapter 6: Escrow Account](#)
- [Chapter 7: Portability in the Housing Choice Voucher FSS Program](#)

These updates have been made to include a Cover Letter with an anticipated date of approval by the SAHA Board of Commissioners, following the public comment process and approval by HUD required as part of the MTW Plan Amendment process. This Table of Contents also reflects the structure and organization of the ACOP and the Admin. Plan, which are also included within the MTW Plan and pertain to SAHA's Public Housing and Housing Choice Voucher (HCV) Programs, respectively.

## Reason for the Change to 1.2.E Organization of the Plan

Language was updated in 1.2.E to clarify which policies are discretionary policies determined by SAHA and which policies are specifically related to how SAHA's MTW activities affect FSS Program policies. This change adds clarity and mirrors the program policies contained within the ACOP and Admin. Plan.

### 1.2.E ORGANIZATION OF THE PLAN

- (1) The FSS Action Plan is organized to provide information to users in particular areas of operation.

(2) SAHA policies are provided in pink text boxes.

(3) SAHA's Moving To Work (MTW) policies (see Section 1.4) are provided in green text boxes.



## Reason for the Change to 2.1.A Purpose

This section includes an overview of the FSS Program and its critical function in achieving SAHA's mission for individuals and families to realize self-sufficiency, which is defined below. This section does not include a material change and instead provides a key feature of the overall FSS Program, which is a voluntary case management program available to both Public Housing residents and HCV participants.

### 2.1.A. PURPOSE

- (1) The purpose of the Family Self-Sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of public housing assistance and housing assistance under the Housing Choice Voucher (HCV) program with public and private resources enabling families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency [984.101(a)(1)].
- (2) In addition to this broader national goal of the FSS program, SAHA also establishes a local goal consistent with SAHA's mission statement to serve as a guide for establishing policy and implementing the FSS program.

(3) SAHA's goal in operating its FSS program is to match housing-assisted families with a broad range of highly collaborative, existing community services, which will assist FSS families and individuals in achieving economic self-sufficiency.

(a) Economic self-sufficiency is defined as having the sustainable skills, training and education necessary to secure and maintain employment paying sufficient income to consistently meet the family's basic needs with no or minimal use of financial assistance from public or private organizations.

## Additional Information on the FSS Program

SAHA's FSS Program is one of the largest in the country, serving both PH and HCV clients, with a maximum capacity of 1,275 enrolled participants. It is a voluntary five year program, with the option of up to two years' extension. Each FSS participant has the opportunity to accrue escrow (an amount of money that is the difference between their monthly income and their rent) while working toward completing an Individual Training and Service Plan (ITSP). Once FSS families have completed the ITSP, they can graduate and receive their escrow lump-sum, which is typically a significant amount of money and can be put towards a downpayment on a home, starting a business, continuing education for themselves or their children, etc. The FSS Action Plan outlines



all relevant ITSP policies and graduation procedures to assist in proper FSS program implementation and ensure the success of its participants.

The following selection includes language from the remaining chapters of the proposed FY21-22 FSS Action Plan in order to highlight additional key features of the FSS Program. Additionally, these selections highlight some of the specific policies enacted by SAHA in order to define additional clarity and guidance for FSS Program staff and participants. These selections contribute to a general understanding of the FSS Program as outlined within the proposed Action Plan.

The proposed FY21-22 Action Plan is available in its entirety at [saha.org](http://saha.org) under “Public Notices,” and comments may be submitted on any section or language contained within the Action Plan. The deadline for submitting public comment is Tuesday, April 20, 2021.

### 3.2.A OVERVIEW

- (1) As another integral part of FSS program administration, each participating PHA must establish a program coordinating committee (PCC) whose functions will be to assist SAHA in securing commitments of public and private resources for the operation of the FSS program within SAHA's jurisdiction, including assistance in developing the action plan and in implementing the program [24 CFR 984.202(a)].
- (2) ...

### 3.2.B PCC MEMBERSHIP

- (1) **Required PCC Membership [24 CFR 984.202(b)(1)]**
  - (a) ...

#### **(2) SAHA's Required PCC Membership**

- (c) SAHA's representative to the PCC will be the PH FSS and HCV FSS Supervisors.
- (i) FSS case management specialists will serve as administrative support to this committee.
- (d) PH resident representatives may be solicited from the Resident Ambassador program, Resident Councils, FSS alumni and/or a pool of PH residents who have expressed interest.
- (e) HCV resident representatives may be solicited from FSS alumni, a pool of HCV residents who have expressed interest, and/or a recruitment effort of HCV residents by FSS staff.



**(3) Recommended PCC Membership [24 CFR 984.202(b)(2)]**

Membership on the PCC also may include representatives of the unit of general local government served by SAHA, local agencies (if any) responsible for carrying out employment training programs or programs funded under the Workforce Innovation and Opportunities Act (WIOA) and other organizations, such as other state, local, or tribal welfare and employment agencies, public and private education or training institutions, child care providers, nonprofit service providers, private business, and any other public and private service providers with resources to assist the FSS program.

**(2) SAHA's Recommended PCC Membership**

(c) SAHA's FSS program PCC membership will include, but is not limited to, leadership from the following organizations:

- (i) Alamo Colleges District's Integrated Basic Education Skills Training (I-BEST) Program
- (ii) Project QUEST
- (iii) Workforce Solutions Alamo (WSA)
- (iv) Providence Place
- (v) San Antonio College's Financial Empowerment Center
- (vi) San Antonio Fatherhood Campaign
- (vii) South Texas Leadership Center
- (viii) Neighborhood Assistance Corporation of America (NACA)
- (ix) River City Credit Union
- (x) Head Start
- (xi) Catholic Charities San Antonio - Volunteer Income Tax Assistance (VITA) Program
- (xii) Health Professions Opportunity Grants (HPOG)
- (xiii) Bexar County BiblioTech Library
- (xiv) Goodwill Industries San Antonio
- (xv) University Health System - CareLink
- (xvi) Wellcare
- (xvii) Martinez Street Women's Center



(xviii) Healthy Texas Women

(xix) Avance San Antonio

...

**4.1.B INCENTIVES FOR PARTICIPATION [24 984.201(d)(5)]**

- (1) By regulation, the FSS Action Plan must include SAHA’s incentives plan—a description of the incentives that SAHA intends to offer eligible families to encourage their participation in the FSS program.
- (2) The incentives plan provides for the establishment of the FSS escrow account and any other incentives designed by SAHA.

(3) In accordance with HUD regulations, SAHA will offer the incentive services identified in the SAHA Incentives for Participation Grid below.

**SAHA Incentive Services for Participation Grid**

<u>Incentive Service Category</u>	<u>Service Provider*</u>	<u>Service Description</u>
<u>FSS Escrow Account</u>	<u>SAHA</u>	<u>An interest bearing escrow account where the difference from baseline rent and rent increase due to income increases is deposited and accrues on a monthly basis.</u>
<u>Case Management</u>	<u>FSS Case Management Specialists</u>	<u>An enhanced support system and holistic case management which includes ongoing individual assessment, service plan development, follow-up/monitoring of ITSP progress and career exploration or coaching.</u>
<u>Referral and Service Information</u>	<u>FSS Case Management Specialists</u>	<u>Enhanced access to educational, training, and employment opportunities. Access to free or reduced cost services and access to multiple financial literacy, credit building, home buying, car buying, and other important life skill workshops.</u>



<u>Partner Supportive Services Information</u>	<u>FSS Case Management Specialists;</u> <u>Agency Partners</u>	<u>Collaborative services and/or referrals to approved partner agencies for services similar to those listed above.</u>
<u>Other**</u>	<u>FSS Case Management Specialists;</u> <u>Agency Partners;</u> <u>SAHA</u>	<u>Collaborative services and/or referrals not otherwise included within the services above, which may be due to seasonal or emergency events as needed.</u>
<p><u>**"Service Provider" is defined as the primary party responsible for delivering the selected incentive service through the SAHA's Community Development Initiatives (CDI) department. In accordance with HUD regulations and subject to SAHA policy, CDI staff provide resident services coordination, which may also include collaboration with the following parties:</u></p> <ul style="list-style-type: none"> <li>• <u>Internal SAHA stakeholders involved in SAHA program administration, as deemed necessary and appropriate by department leadership.</u></li> <li>• <u>External community partners that represent nonprofits, community-based organizations and other government entities.</u></li> <li>• <u>Other individuals, advocacy groups and community stakeholders, as deemed necessary and appropriate by SAHA leadership.</u></li> </ul> <p><u>**"Other" is defined as additional supportive services and resources that, in accordance with HUD regulations and SAHA policy, may become available through internal staff or community support.</u></p>		

...

**4.1.D ASSURANCE OF NON-INTERFERENCE WITH THE RIGHTS OF NON-PARTICIPATING FAMILIES [24 CFR 984.201(d)(10)]**

- (1) A family's housing assistance or admission into assisted housing should never depend on whether they choose to participate in the FSS program, and PHAs need to make this known as part of the recruitment process.
- (2) For this reason, SAHA's Action Plan must include an assurance that a family's decision to not participate in the FSS program will not affect the family's admission to the public housing or housing choice voucher programs, nor will it affect the family's right to occupancy in accordance with the lease.



- (3) Participation in the FSS program is strictly voluntary.
- (4) Public housing residents and Housing Choice Voucher (HCV) program participants will be notified in all literature and media presentations related to the FSS program that should they decide not to participate in the FSS program it will not affect their public housing or HCV assistance.
- (5) This material will also specify that the family will retain the right to occupancy, according to the terms of their lease and family obligations contract.

...

#### **4.3.B METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS [24 CFR 984.201(d)(8)]**

...

- (3) Supportive services needs are identified by completion of a needs assessment with the FSS coordinator or case manager before completion of the initial Individual Training and Services Plan (ITSP), which occurs prior to signing the contract of participation.
- (4) After enrollment in the FSS program, needs assessment results may also be used to modify the ITSP and supportive services, if requested by the family and in accordance with HUD regulations and SAHA policy.

...

#### **(3) ITSPs for FSS Family Members Other than FSS Head**

An ITSP is only required for the head of the FSS family.

- (a) This means that it is SAHA's decision, after consulting with the family, whether to create an ITSP and provide supportive services to other family members aged 18 or over if they want to participate in the FSS program and supportive services are available [Notice PIH 93-24, G-16].

- (b) SAHA will permit additional family members to have an ITSP, in accordance with HUD guidance and relevant SAHA policy.

...

#### **5.2.I GRIEVANCE PROCEDURES**





- (1) When adverse action is taken by SAHA against a family, SAHA is required to provide a grievance hearing in the public housing program, or an informal hearing in the housing choice voucher program [24 CFR 966 subpart B, 24 CFR 982.554].
- (2) According to regulatory requirements, the FSS Action Plan must contain the grievance and hearing procedures available for FSS families against whom SAHA has taken adverse action with regards to FSS [24 CFR 984.201(d)(9)].

- (2) SAHA's FSS program will utilize the grievance procedures and policies for the FSS family's respective housing assistance program.
  - (a) HCV FSS families will be subject to the informal review and hearings procedures as outlined in Section 16.3 of the Administrative Plan.
  - (b) FSS families residing in public housing will utilize the grievance procedures outlined in the Admissions and Continued Occupancy Policy (ACOP) and SAHA's Public Housing Lease. See Chapter 16 of the ACOP for public housing grievance and informal hearing procedures.
- (3) In addition to the adverse actions listed in SAHA's HCV and public housing programs, the FSS program's adverse actions include, but are not limited to:
  - (a) Denial of admission into the FSS program;
  - (b) Denial of request for supportive services;
  - (c) Denial of request to change the ITSP;
  - (d) Denial of request to change the head of household;
  - (e) Denial of request for interim disbursement of the escrow account;
  - (f) Denial of request to complete the COP;
  - (g) Denial of a request for extension to the FSS COP;
  - (h) Denial of request for final distribution of the escrow account or any portion thereof;
  - (i) Withholding of support services; and
  - (j) Termination of the FSS COP.

...



### 6.2.C REPORTING ON THE FSS ACCOUNT

- (1) SAHA is required to make a report, at least once annually, to each FSS family on the status of the family's FSS account.

...

(a) SAHA will provide FSS participants an annual statement on the status of their FSS escrow account.

...

### 7.1.C. RESIDENCY REQUIREMENTS

- (1) Families participating in an HCV FSS program are required to lease an assisted unit within the jurisdiction of the PHA that selected the family for the FSS program for a minimum period of 12 months after the effective date of the contract of participation.

...

(3) SAHA will approve a family's request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation only as needed for training, education, employment, support services or to meet personal family needs.

(4) Relocation and portability from SAHA's HCV program are subject to HUD regulations and SAHA's Housing Choice Voucher program policy.

(a) For additional information on applicable policy, see "SAHA's Relocation Plan" in Sec. 12.2.E of the Administrative Plan.