

HOUSING WORKS

FAMILY SELF-SUFFICIENCY PROGRAM

FSS FINAL RULE

ACTION PLAN

Updated: November 2024

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I. Introduction

<p>Instructions: While not required by the applicable regulations, an introduction is recommended to provide an overview of what the document is and what it contains.</p>	<p>Introduction</p> <p>This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by the Central Oregon Regional Housing Authority. It was submitted to HUD on 09/02/2022.</p> <p>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.</p> <p>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.</p> <p>This FSS Action Plan describes the Central Oregon Regional Housing Authority's local policies for operation of the FSS program in the context of federal laws and regulations. The FSS program will be operated in accordance with applicable laws, regulations, notices and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.</p> <p>The FSS program and the functions and responsibilities of PHA staff are consistent with the Central Oregon Regional Housing Authority's personnel policy and Agency Plan.</p>
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II. Program Objectives

<p>Instructions: While not required by the applicable regulations, a section on program objectives can help provide an overall framing for what your FSS program is trying to achieve. Your FSS program is free to adopt whatever local objectives you wish so long as they do not conflict with the federal objectives.</p>	<p>Program Objectives</p> <p>Central Oregon Regional Housing Authority's FSS program seeks to help families make progress toward economic security by supporting the family's efforts to:</p> <ul style="list-style-type: none">• Increase their earned income• Build financial capability• Achieve their financial goals
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<p>The federal objectives for the FSS program are specified in 24 CFR 984.102.</p>	<p>The objective of the FSS program is to reduce the dependency of low-income families on welfare assistance and housing subsidies. Under the FSS program, HUD assisted families are provided opportunities for education, job training, counseling, and other forms of social service assistance, while living in assisted housing, so that they may obtain the education, employment, and business and social skills necessary to achieve self-sufficiency, as defined in CFR 24 § 984.103.</p> <p>The FSS Action Plan describes the policies and procedures to operate an FSS program. Having a Zero Mandated Program, Central Oregon Regional Housing Authority is strictly a Voluntary Program.</p>
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III. Program Size and Characteristics

III.A. – Family Demographics

<p>Instructions. Describe the characteristics of the families you expect to be served by your FSS program. This information must include data on their race and ethnicity and may also include data on other characteristics.</p> <p>Note: This information is required per 24 CFR § 984.201(d)(1). That section also requires a description of supportive service needs of families expected to be served, which is covered in Section III.B of this sample Action Plan, and how many families are expected to be served, which is covered in Section III.C.</p> <p>Description of sample tables</p>	<p>Family Demographics</p> <p>These tables describe the demographics of the population expected to be served by Central Oregon Regional Housing Authority’s Action Plan.</p> <p>The FSS program will serve the following housing assistance programs:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Housing Choice Vouchers (HCV): Tenant-Based Vouchers <input checked="" type="checkbox"/> Housing Choice Vouchers (HCV): Project-Based Vouchers (PBV) <input checked="" type="checkbox"/> Housing Choice Vouchers (HCV): HCV Homeownership <input checked="" type="checkbox"/> Housing Choice Vouchers (HCV): Other special purpose vouchers: <ul style="list-style-type: none"> - EHV - NED - FUP - FUP-Y - VASH - Mainstream
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Start by indicating which housing assistance programs your FSS program will serve by checking the appropriate boxes.

The sample Action Plan then includes several tables that you may use to show characteristics of the population expected to be served. If it makes it easier to develop estimates, new FSS programs may assume that FSS participants will be similar to the general population of the PHA or property.

To describe the characteristics of the families your program plans to serve, you may use the tables in the right-hand column and fill them in to provide the appropriate information. You may also modify the tables to specify different ranges or to otherwise reflect the available data. The information requested through the tables should be available on the HUD-50058 or HUD-50059 Family Reports in PIC or TRACS, respectively.

To complete the tables:

- **Ages of Head and Other Adults.** For each row, estimate the share of heads or

Ages of Head of Household and Other Adults

	Percent
Ages of Head of Household	
--Head of Household is age 24 years or younger	1%
--Head of Household is age 25 to 50	44%
--Head of Household is age 51 to 61	19%
--Head of Household is age 62 or greater	35%
Ages of Other Adults in Household	
-- Age 24 years or younger	36%
-- Age 25 to 50	37%
-- Age 51 to 61	16%
-- Age 62 or greater	11%

Presence and Ages of Children

	Percent
Presence and Ages of Children	
--Households that only include adults over age 18	29%
--Households that include one or more child age 13-17	22%
--Households that include children who are all 12 or younger	40%

other adults (as noted) in each age category.

- Presence and Ages of Children.** For the first row, estimate the percentage of households that have no children under 18. For the second row, estimate the percentage of households with one or more child age 13-17. For the third row, estimate the percentage of households that include at least one child age 12 or younger and no children over age 12.
- Employment Status.** For the first two rows, estimate the share of families whose heads are employed and unemployed. The two rows should add up to 100%. The next two rows show similar information, but for all family members. These two rows should also add up to 100%.
- Annual Earned Income.** Estimate the share of families within each earned income category.
- Elderly/Disability Status.** Estimate what share of families have an elderly head or a head with disabilities, and

Employment Status of Population to be Served

	Percent
Employment Status of Head of Household	
--Families with an employed head	22%
--Families whose head is unemployed	78%
Employment Status of All family members	
--Families with any member that is employed	45%
--Families with no employed member	55%

Annual Earned Income of Population to be Served

	Percent
Annual household earnings <\$5,000 per year	12%
Annual household earnings between \$5,000 and \$9,999	16%
Annual household earnings between \$10,000 and \$14,999	35%
Annual household earnings between \$15,000 and \$19,999	13%
Annual household earnings between \$20,000 and \$24,999	10%
Annual household earnings between \$25,000 and \$29,999	6%
Annual household earnings between \$30,000 and \$34,999	3%
Annual household earnings of \$35,000 or higher	7%

then estimate what share of families include an elderly person or a person with disabilities.

- **Race/ethnicity.** This is a required table. Estimate the racial and ethnic composition of the families to be served by the FSS program. In this table, the percentages in the Non-Hispanic and Hispanic columns should add up to the percentage shown in the Race column. For example, if 50 percent of the expected population to be served consists of White households, and half of these households are expected to be Hispanic, enter 50% in the first column and 25% in each of the next two columns.

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	14%
--Head of Household is an elderly person with disabilities	21%
--Head of Household is a non-elderly person without disabilities	33%
--Head of Household is neither an elderly person nor a person with disabilities	33%
Elderly/Disability Status of All Household members	
--Household includes an elderly person without disabilities	15%
--Household includes an elderly person with disabilities	23%
--Household includes a non-elderly person with disabilities	38%
--Household includes no elderly persons or persons with disabilities	39%

Race and Ethnicity of Population to be Served (required)

Race		Non-Hispanic	Hispanic
White	94%	95%	5%
Black or African-American	2%	89%	11%
American Indian or Alaska Native	3%	70%	30%
Asian	.5%	100%	0%
Native Hawaiian or other Pacific Islander	.6%	67%	33%
Other Race	0%	0%	0%

III.B – Supportive Services Needs

Instructions: Describe in this section the supportive service needs of the families you expect to participate in your FSS program. The sample text provides illustrations of needs to consider. Feel free to adjust this list to reflect the needs you identify. Then indicate how you identified the supportive services needs by checking one or more of the boxes and/or adding your own explanation.

Note: 24 CFR § 984.201(d)(1) specifies that FSS Action Plans must include “Family demographics. A description of the number, size, characteristics, and other demographics (including racial and ethnic data), and **the supportive service needs of the families expected to participate in the FSS program**” The characteristics other than supportive service needs are covered above, in Section III.A and the size of the program is covered in Section III.C.

Supportive Services Needs of Families Expected to Participate in FSS

The following is a list of the supportive service needs of the families expected to enroll in the **Central Oregon Regional Housing Authority** FSS program:

- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerated basic skills instruction
- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for childcare
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- 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
- Other needs as requested by FSS participants

III. C. – Estimate of Participating Families

Instructions: Provide an estimate of the number of eligible families who can reasonably be expected to receive services based on available resources.

If you are funded for FSS coordinator positions, by virtue of that funding, you have a minimum number of participants to be served each year. Be sure that your Estimate of Participating Families is at a minimum, the number of participants required by your funding.

Note that if you have not yet fulfilled your Mandatory Program size requirement, your Estimate of Participating Families must be at least the minimum program size required for your agency. For more information, see 24 CFR §984.105 and FSS Guidebook Section 6.6 Minimum FSS Program Size).

Estimating Participating Families

You must describe how many families you expect your FSS program will be able to serve at a time and then estimate how many families your program will serve over a five-year period. The sample text includes different options for existing and new programs.

If you are operating an *existing program*, you should use your records to identify how many families enroll per year and add five years of new enrollment to the typical program size to estimate how many families you will serve over five years.

If you are starting a *new program*, you will need to adopt some assumptions about graduation and attrition for other reasons. For example, assume an FSS program has a capacity of 100 families and expects to operate at capacity at all times. If the program expects 50 of those families to graduate in five years (with some families getting an extension) and 10

Estimate of Participating Families

Over time, **Central Oregon Regional Housing Authority** hopes to serve all families who are interested in participating in the FSS Program. The number of spaces available in the program at any given time, however, will be limited by the program's resources, including the number of FSS coordinators funded to work with FSS participants. New families will be admitted to the FSS program as space permits.

In recent years, the **Central Oregon Regional Housing Authority** has been funded for **2** coordinators. The minimum number of participants required to be served based on this funding is **75**.

Historically, **Central Oregon Regional Housing Authority's** FSS program has enrolled **31** new families into the FSS program each year. Accordingly, **Central Oregon Regional Housing Authority** expects to be able to provide FSS Services to **255** families over a five-year period.

families to leave the program each year for other reasons, the expected number of families to be served in the first five years is 200 (100 + 50 new enrollees who replace graduates + 50 new enrollees who replace families who leave for other reasons.)

Note that the number of families your FSS program expects to serve is different from the minimum number of families that your FSS program is required to serve under the terms of the Notice of Funding Opportunity that allocated the funds. FSS programs are encouraged to enroll more than the minimum number of families, so long as this is possible without compromising your program's quality.

If your agency is a PHA with an FSS mandate, you should include the text indicated in the right-hand column and complete the table.

In accordance with CFR §984.105(c), if the Estimate of Participating Families is smaller than the Minimum Program Size, indicate if you have an exception granted by HUD to run a program smaller than the mandate and when that exception expires.

III. D – Other Self-Sufficiency Programs

Instructions: If you expect families from another self-sufficiency program to enroll in your FSS program, provide estimates of the numbers of these families.

For PHAs: If you seek to enroll families in the FSS program that are nearing the end of their eligibility for the Jobs Plus Earned Income Disregard as a way to continue to serve these families, you may wish to describe this approach in this section.

Other Self-Sufficiency programs

Option 1:

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

<p>The sample Action Plan text includes two options – one for FSS programs that expect to enroll families from other self-sufficiency programs and one for FSS programs that do not. Choose the option that best fits your program. If you choose Option 1, check the applicable boxes to indicate which programs are included and, if you have an estimate in mind, indicate the number of families from that program you expect to enroll.</p> <p>For more information, see 24 CFR §984.201(d)(3) and FSS Guidebook section 2.2 Outreach and Enrollment.</p>	Name of Program	Check box if applicable	Number of Families each year
	Family Unification Program - Family	<input checked="" type="checkbox"/>	2
	Family Unification Program – Youth (FUP-Y)	<input checked="" type="checkbox"/>	1
	Emergency Housing Voucher (EHV)	<input checked="" type="checkbox"/>	2
	Veterans Affairs Supportive Housing (VASH)	<input checked="" type="checkbox"/>	2

IV. Family Selection Procedures

<p>Instructions: Describe your policies and procedures for selecting FSS participants, including whether your FSS program will offer a preference to prospective participants who are already enrolled in, or on the waiting list for, FSS-related service programs and whether your FSS program plans to screen prospective participants for motivation to participate. (Note that motivation is the only allowable screening criteria to include).</p> <p>Note: The maximum number of FSS slots with a selection preference is limited to 50% of the total number of FSS slots.</p> <p>For any preference your program selects, you must provide the following:</p>	<p>Family Selection Procedures</p> <p>To be eligible for Central Oregon Regional Housing Authority’s FSS Program, potential applicants must meet the following conditions:</p> <ol style="list-style-type: none"> 1. Be a current HCV participant in good standing means; has either satisfied or are current on any debts owed to the PHA or owner; and is in compliance with the regulations in part 5 and chapters VIII and IX of this title regarding participation in the relevant rental assistance program. 2. Has not voluntarily exited, been terminated, or graduated the FSS program less than one year prior to signing a new Contract of Participation (CoP) or graduated twice from the program previously. 3. Be an eligible FSS adult Head of Household (citizen or eligible non-citizen). <p>Families interested in participating in the FSS Program will receive information outlining the program, its benefits, and program requirements/responsibilities for participation. Prior to signing the Contract of Participation, all individuals/families will complete an intake packet and schedule a personal interview with an FSS Coordinator. Participant screening will not discriminate in any way based on education level, credit rating, marital status, race, age, color, religion, sex, disability, familial status or national origin. Central Oregon Regional Housing Authority’s FSS program does not offer any preference to</p>
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1. Percentage of slots for which your program will give the selection preference
 2. If applicable, the FSS related service programs to which your program will give a selection preference
 3. The method of outreach to, and selection of, families with one or more members participating in the identified programs
 4. How families with the applicable preferences will be selected from the wait list: (a) date and time of application; or (b) a drawing or other random choice technique.
- (see 24 CFR 984.203 and FSS Guidebook Section 2.2 Outreach and Enrollment)

Policy Decisions: In completing this section, you will need to make the following policy decisions:

1. Whether to allow selection preferences. If so, (a) what selection preferences, (b) outreach methods, and (c) selection methods. Start by indicating whether you will utilize any selection preferences by selecting the appropriate option. Then complete the table applicable to that option.

prospective participants. who are already enrolled in, or on the waiting list for, FSS-related service programs.

A. Waiting List

In the event that there are more applicants for the FSS Program than available openings, **Central Oregon Regional Housing Authority** will establish an FSS waitlist. This waitlist will be maintained in chronological order based on the date and time of the applicant’s request to be added to the waitlist. Applicants on the waitlist will be notified by phone, email or physical mail that they have been selected from the waitlist. They will have 10 business days from date of notification to complete the FSS intake packet and schedule an intake interview with an FSS coordinator. If the coordinator and the participant agree that the program is appropriate for the participant at that time, a Contract of Participation (CoP) will be signed with the designated FSS head of household (HoH). If the applicant does not respond within the 10 business days, their name will be removed from the list and the next applicant on the list will be contacted.

If a family is porting into **Central Oregon Regional Housing Authority’s** jurisdiction and inquires about joining the FSS program, an FSS Coordinator will schedule a preliminary meeting to review the portability requirements in accordance with CFR 24 §984.306. If identified as eligible, the family will be enrolled in the FSS program or added to the waitlist.

B. Admissions Preferences

Option 1: No preference:

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>
Date the family expressed an interest in participating in the FSS program	<input checked="" type="checkbox"/>

<p>The “% of FSS slots” is a percentage of the whole anticipated program size, as established in III.C (above)</p> <ol style="list-style-type: none"> 2. Whether to include a screening for motivation. If so (a) what the screening will entail, and (b) how the FSS program will ensure reasonable accommodations to avoid discrimination. Select the appropriate option. 3. What families or family members may re-enroll in the FSS program following exit from the program and under what circumstances. 4. What process to follow for documenting the family’s choice of Head of FSS Family. <p>Note: Your FSS program may use motivational screening factors to screen families interested in participating in the FSS program. You may use these factors to measure a family’s interest and motivation to participate in the FSS program. (see 24 CFR 984.203 and FSS Guidebook Section 2.2 Outreach and Enrollment)</p> <p>Note: This section includes a required statement affirming that the organization will not engage in unlawful discrimination.</p>	<p>C. Screening for motivation.</p> <p><input checked="" type="checkbox"/> Option 2: The Central Oregon Regional Housing Authority will use one or more motivational screening factors to measure the family’s interest and motivation to participate in the FSS program.</p> <p>The following screening criteria will be used:</p> <p><input checked="" type="checkbox"/> Completion of Intake Application Packet and attending an Orientation Session: The Central Oregon Regional Housing Authority will screen families for motivation to participate in the FSS program by requiring that families apply to enroll in the FSS program by completing an Intake Application Packet and attending an initial orientation session. Each family will be given two opportunities to attend the orientation session and may request accommodation if unable to attend a scheduled orientation session. Accommodations will be offered on a case-by-case basis, depending on the needs of the applicant. Accommodations may include an individually scheduled orientation session, translation services, an alternative location, a virtual orientation session, or allowance and encouragement to bring children to the session, where possible.</p> <p>D. Compliance with nondiscrimination policies</p> <p>It is the policy of Central Oregon Regional Housing Authority 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, Central Oregon Regional Housing Authority’s FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).</p> <p>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, Central Oregon Regional Housing Authority will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.</p>
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E. Re-enrollment of prior FSS participants

The following previous FSS families will be allowed to re-enroll in **Central Oregon Regional Housing Authority's** FSS program:

- FSS program graduates can re-enroll:
 - one year after graduation effective date
 - and graduate no more than twice from the FSS program.
- FSS participants who have withdrawn voluntarily one year after graduation effective date.
- Families terminated with escrow disbursement one year after graduation effective date.
- Families involuntarily terminated one year after graduation effective date.
- Family members who were not Heads of FSS Family previously
 - one year after graduation effective date
 - and graduate no more than twice from the FSS program.

The following conditions apply to re-enrollment:

- The family will be eligible to re-enroll in the FSS program one year after their previous exit date.
- A household may not re-enroll if they have graduated from the FSS program twice previously.
- If a non-graduate family requests to re-enroll, the family may be eligible to reapply to the FSS program one year after the termination date if they can effectively demonstrate why they can now successfully complete the program. This request to reapply and supporting statements must be provided in writing (included in Intake Application Packet).

F. Head of FSS Family

The head of the FSS family is designated by the participating family. The **Central Oregon Regional Housing Authority** may make itself available to consult with families on this decision, but it is the assisted household that chooses the head of FSS family that is most suitable for their individual household circumstances. The designation or any changes by the household to the Head of FSS Family must be submitted to the **Central Oregon Regional Housing Authority** in:

	<p><input checked="" type="checkbox"/> A form developed by the Central Oregon Regional Housing Authority</p> <p>Prior to signing the Contract of Participation, the participating family must select an adult member of the household who will be designated the “Head of FSS family” who will sign the Contract of Participation (CoP) and therefore must comply with the contract rules throughout the contract. If the Head of FSS Family fulfills the contract requirements and meets the graduation criteria, any accumulated FSS escrow saving will be distributed to the Head of FSS Family. All adult household members over 18 at time of CoP signing will be required to sign a PHA provided form verifying and agreeing to the choice of Head of FSS of family prior to the CoP signing.</p>
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V. Outreach

<p>Instructions: Describe the planned notification and outreach efforts by your FSS program to recruit FSS participants from among eligible families and to provide FSS information to minority and non-minority families.</p> <p>The sample Action Plan lists a number of typical outreach methods. Check the ones that apply to your program and provide details about how you will implement each method, including how often.</p> <p>You should feel free to modify this section to reflect your program’s outreach strategy. However, it is recommended that you retain the note at the end of this section which affirms that outreach will comply with all applicable fair housing protections.</p>	<p>Outreach</p> <p>The Central Oregon Regional Housing Authority 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 phone or by email. Central Oregon Regional Housing Authority’s interpretive services are provided by a third party contracted vendor.</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 50%;">Outreach Methods</th> <th style="width: 50%;">Details, including frequency</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/> Posting information about FSS on the Central Oregon Regional Housing Authority’s website</td> <td>Ongoing support and updates on specific FSS web page at https://www.housing-works.org/pathworks/</td> </tr> <tr> <td><input checked="" type="checkbox"/> Posting FSS program flyers in locations likely to be seen by eligible families</td> <td>Flyers available at front receptionist desk Video monitor in lobby displaying FSS program information and past graduates’ stories</td> </tr> <tr> <td><input checked="" type="checkbox"/> Providing information about the FSS program during scheduled reexaminations</td> <td>Flyers included with annual housing reexamination packets</td> </tr> <tr> <td><input checked="" type="checkbox"/> Providing information about the FSS program at voucher orientation sessions</td> <td>Flyers included in orientation packet and Housing Specialists introduce the FSS program</td> </tr> </tbody> </table>	Outreach Methods	Details, including frequency	<input checked="" type="checkbox"/> Posting information about FSS on the Central Oregon Regional Housing Authority’s website	Ongoing support and updates on specific FSS web page at https://www.housing-works.org/pathworks/	<input checked="" type="checkbox"/> Posting FSS program flyers in locations likely to be seen by eligible families	Flyers available at front receptionist desk Video monitor in lobby displaying FSS program information and past graduates’ stories	<input checked="" type="checkbox"/> Providing information about the FSS program during scheduled reexaminations	Flyers included with annual housing reexamination packets	<input checked="" type="checkbox"/> Providing information about the FSS program at voucher orientation sessions	Flyers included in orientation packet and Housing Specialists introduce the FSS program
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(see 24 CFR 984.201(c)6 and FSS Guidebook Section 2.2 Outreach and Enrollment)		and provides direct referrals to FSS Coordinators
	<input checked="" type="checkbox"/> Direct phone and email marketing	As needed to maintain estimated program participation size
	<input checked="" type="checkbox"/> Providing information about the FSS program to eligible families by mail	As needed to maintain estimated program participation size
	<input checked="" type="checkbox"/> Other: Marketing video and graduate success stories	Marketing videos available on website Graduate stories updated annually – included on lobby monitor and plaques on PHA <i>Wall of Fame</i>
	<input checked="" type="checkbox"/> Other: FSS Newsletter	Released quarterly and includes graduate success stories and FSS program promotion
<p>Outreach informational material about the FSS Program may include information about:</p> <ul style="list-style-type: none"> • Program overview • Program benefits • Available resources • Participant responsibilities • Program outcomes <p>Outreach efforts will be targeted equally to all families, using materials in both English and other commonly spoken languages to ensure that non-English and limited English-speaking families receive information and have the opportunity to participate in the FSS Program. In conducting outreach, the Central Oregon Regional Housing Authority will account for the needs of person with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible who wish to participate are able to do so.</p>		

VI. FSS Escrow Account and Other Incentives for Participants

Instructions: Describe your FSS program’s policies regarding the escrow account, as well as any other incentives that you intend to offer eligible families to encourage participation in the FSS program.

The sample text covers key issues related to escrow program administration, including interim disbursements. While FSS programs are not required to offer interim disbursements, HUD encourages FSS programs to do so as a way of helping families stay on track toward their goals.

(see 24 CFR 984.305 and FSS Guidebook Section 2.2 Outreach and Enrollment for information on incentives. See 24 CFR 984.305(c)2 and 24 CFR 984.305(f)2 respectively for regulations relating to interim disbursement of escrow funds and information relating to forfeited escrow funds and FSS Guidebook Section 5.2 The FSS Escrow Account.)

Policy Decisions: In completing this section, you will need to make the following policy decisions:

1. Whether to provide financial incentives to FSS participants (in addition to the escrow account),

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 the **Central Oregon Regional Housing Authority**, are described below.

A. Additional Incentives

Option 2. The **Central Oregon Regional Housing Authority’s** FSS program provides the following incentives to FSS participants in addition to the FSS escrow account:

- Career and educational resources
- One-on-one coaching with an emphasis on goal formation and completion
- Access to Individual Development Accounts
- Referrals to community programs and support services as requested/needed
- Homeownership opportunities and coaching
- Financial and credit coaching workshops and referrals

B. Interim Disbursements

Option 1: The Central Oregon Regional Housing Authority will allow for interim disbursements on a case-by-case basis: Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP). Requests will be made 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 the **Central Oregon Regional Housing Authority**. The FSS Coordinator will discuss with the FSS participant that all other options have been exhausted before submitting an interim disbursement request for approval.

C. Uses of forfeited escrow funds.

Option 2: Treatment of forfeited FSS escrow account funds. FSS escrow account funds forfeited by the FSS family (if any) will be used to support FSS participants in good standing. Upon written

and, if so, what incentives to provide under what conditions. (Select the appropriate option.)

2. Whether to allow interim disbursements of escrow savings. If so: (a) under what conditions will interim disbursements be permitted (including restrictions on interim disbursements, if any), and (b) what your programs procedures for applying for and approving interim disbursements will be. (Three options have been provided. If you select the second option, indicate what guidelines apply to specific expenditure types.)

In your policy, be sure to include

- how a request is made
- by whom
- any limitations on when a request may be made
- eligible activities
- how the request will be reviewed/who will make the determination

3. What are the eligible uses of forfeited escrow funds? (Check the uses that apply to your FSS program.)

In your policy, be sure to include

- how a request is made

request from a family, the FSS Coordinator, FSS Program Manager, and Housing Choice Voucher Director will consider the available funds and approve or deny the request.

The **Central Oregon Regional Housing Authority** may also initiate a request for the use of forfeited escrow funds.

Option 1: At the discretion of the FSS coordinator, forfeited escrow funds may be considered in lieu of an interim escrow disbursement.

Forfeited FSS escrow funds may be deployed:

- Any time during the term of a household’s CoP

Use of forfeited escrow funds for eligible uses (described below) may be requested by:

- Central Oregon Regional Housing Authority
- Head of the FSS family

Eligible uses of forfeited escrow funds include, but are not limited to:

Central Oregon Regional Housing Authority or the Head of FSS Family may request funds from the forfeited FSS escrow account. The requesting Head of FSS family must have fulfilled at least one outcome or output interim goal listed on their Individual Training and Services Plan (ITSP). The funds may be used to pay for specific goods or services that will help the family make progress toward achieving the goals in their ITSP. Requests will be made 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. A determination of whether the family qualifies for the requested forfeited disbursement will be made on a case-by-case basis by the FSS Coordinator and an administrative staff representative of the **Central Oregon Regional Housing Authority**. The FSS Coordinator will discuss with the FSS participant that all other options have been exhausted before submitting a forfeited escrow disbursement request for approval.

Eligible Uses	Guidelines / Limitations
<input checked="" type="checkbox"/> Training for FSS Program staff	<input checked="" type="checkbox"/> Requests for funding must be approved by the Housing Choice Voucher Program Director

<ul style="list-style-type: none"> • by whom • any limitations on when a request may be made • eligible activities • how the request will be reviewed/who will make the determination <p>4. .)</p>	<p>Central Oregon Regional Housing Authority Policy: FSS Forfeited Funds Allocation Purpose</p> <p>This policy outlines the guidelines for the allocation of Forfeited FSS Escrow Funds to current FSS participants. The goal is to ensure fair and equitable distribution of forfeited escrow funds while prioritizing participants who do not have an active FSS Escrow Savings account.</p> <p>Prioritization of Forfeited Funds Distribution</p> <ol style="list-style-type: none"> 1. Participants Without an FSS Escrow Savings Account Balance <p>FSS participants who do not have a balance in their FSS Escrow Savings account are eligible to request a withdrawal from the FSS Forfeited Funds, up to a maximum of \$3,000 once per year. These participants will be given priority when allocating forfeited funds.</p> 2. Participants With FSS Escrow Savings Account <p>Participants who have an FSS Escrow Savings account balance are required to request an interim escrow withdrawal from their own FSS Escrow Savings account first.</p> <ul style="list-style-type: none"> ○ If the participant’s Interim FSS Escrow request exceeds their available FSS Escrow savings balance, they may request additional funds from the Forfeited FSS Escrow Funds, with the total annual request from Forfeited Funds not to exceed \$3,000. <p>Fund Allocation</p> <p>The \$3,000 maximum limit for Forfeited FSS Escrow Funds withdrawals applies to all participants and participants can make only one withdrawal request per calendar year.</p> <p>Modifications to Withdrawal Limits</p> <p>The \$3,000 limit may be increased or decreased at the request of the FSS Coordinator and/or FSS Program Manager and approved by the HCV Director based on the availability of forfeited funds.</p>
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Housing Works Policy:

HUD form 52650 Family Self-Sufficiency Individual Training and Service Plan (ITSP) provides two fields for listing interim goals and activities/services as shown below.

Name of Participant _____
John Doe

Final Goal

1) To seek and maintain suitable employment based on my skills, education, job training, and receipt of other benefits, and based on the available job opportunities in the area by the end of my CoP.
2) If the FSS family is a recipient of welfare assistance (TANF), the head of FSS Family must certify that every member of the family become independent from welfare assistance before the expiration of the term of the CoP.

Interim Goal Number 1

Outcome Goal

Improve my financial knowledge and skill, reduce my debt and increase my credit score by the end of my CoP.

Date Accomplished _____

Activities/Services	Responsible Parties	Date/s
Pull Credit and Review Create Debt Plan Create written budget	Output Goals	

Housing Works FSS program policy defines both “outcomes and outputs” interim goals as follows. **Outcome goals** are longer-term changes and are documented in the Interim Goal Number ____ field provided on the ITSP. **Output goals** are tasks that support the outcome goals that produce more immediate results. These output goals are documented in the Activities/Services field provided on the ITSP. See examples above.

The Housing Works FSS program will consider the completion of either an interim outcome goal or an interim output goal as completion of an interim goal for purposes of meeting the requirement for requesting an Interim FSS Escrow and Forfeited FSS Escrow withdrawal. Reasonable documentation of the completion of either the output or outcome goal is to be included in the clients request for funds.

VII. Family Activities and Supportive Services

<p>Instructions: Describe the activities and supportive services to be provided to FSS families by both public and private providers and identify the public and private resources which are expected to provide the supportive services.</p> <p>(see FSS Guidebook Section 3.3 Referrals to Service Providers)</p> <p>Check the categories of services and the specific services that your program plans to make available to families through referrals and indicate the source or partner for that service.</p> <p>The sample Action Plan describes the coaching/case management services provided to families in the next Section.</p>	<p>Family Activities and Supportive Services</p> <p>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.</p> <p>Services will be provided through coordination of local, regional, and/or national public and private resources, which will include, but are not limited to the following:</p> <ul style="list-style-type: none"> • <u>Childcare</u>: (on an as needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages • <u>Transportation</u>: necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment • <u>Education</u>: 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 • <u>Employment supports</u>: Job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP • <u>Personal welfare</u>: Substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services • <u>Household management</u>: Training in household management • <u>Homeownership and housing counseling</u>: Homeownership education and assistance and housing counseling • <u>Financial empowerment</u>: 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.
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- *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 applicable Federal civil rights and nondiscrimination laws.

Service	Provider
Childcare	NeighborImpact Childcare Services Boys and Girls Club Parks and Recreation Districts Department of Human Services (DHS)
Transportation Needs	Cascades East Transit Valley Individual Development Account (VIDA)
GED Study and Testing	Central Oregon Community College (COCC) Central Oregon Intergovernmental Council (COIC) Crook, Deschutes, and Jefferson County Libraries Online Resources GED.com
Certificate Programs	Phagan's Sage School of Massage Trade Schools COIC/Worksource Apprenticeships
Post-Secondary Education	COCC Oregon State University (OSU)-Cascades Other Post-Secondary Institutions
Job Skills Training	COIC/Worksource COIC/Worksource - On the Job Training (OJT) Vocational Rehabilitation Employer
Job Development and Placement	COIC/Worksource Employment Agencies
Computer Skills Training	Crook, Deschutes, and Jefferson County Libraries COIC/Worksource Online Resources
Health Insurance	Oregon Health Plan (OHP)

	Mosaic Medical Private Insurance DHS Crook, Deschutes, and Jefferson County
Crisis Intervention Services	Best Care Deschutes County Behavioral Health (DCBH) 911 211
Mental Health Counseling	OHP DCBH OSU-Cascades
Health and Dental Care	Mosaic Medical OHP St. Charles
Alcohol/Drug Abuse Counseling and/or Treatment	Best Care AA/NA Treatment Centers DCBH
Household Management	PATHWorks one-on-one coaching and referrals
Homeownership and Housing Counseling	NeighborImpact (HUD Approved Housing Counseling Agency) Thrive of Central Oregon
Financial Management and Coaching	NeighborImpact Money Management International National Foundation for Credit Counseling DevNW Credit.org Save First Financial
Assistance Understanding Credit Report	Annualcreditreport.com Families Forward NeighborImpact Money Management International National Foundation for Credit Counseling DevNW Credit.org Save First Financial

Individual Development Accounts	CASA of Oregon NeighborImpact
Micro Loans and Credit Builder Loans	Families Forward Innovative Changes Credit Unions
Senior Support Services	DHS Council on Aging
Disability Support Services	DHS Abilitree Vocational Rehabilitation Full Access High Desert
Legal Assistance	Legal Aid Lawyer in the Library Local Attorneys
<p>To maintain existing commitments and develop new public and private supportive service partnerships, FSS program coordinators actively engage with the community through ongoing outreach.</p>	

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

<p>Instructions: Describe how your FSS program will identify the needs of participating families and deliver the appropriate supportive services. (see FSS Guidebook Section 3.3 Referrals to Service Providers)</p> <p>Policy Decisions: In completing this section, you will need to make the following policy decisions:</p> <ol style="list-style-type: none">1. What approaches and procedures you will use to identify family needs for support services.2. How your program will approach coaching or case management (See FSS Guidebook Chapter 3 Case Management/Coaching for recommendations and best practices).3. Whether to provide services referrals to families who have completed their FSS contracts of participation. (Select the option that applies. See 24 CFR 984.303(e)2 for relevant regulations)	<p>Method of Identifying Family Support Needs and Delivering Appropriate Support Services</p> <p>A. Identifying Family Support Needs</p> <p>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.</p> <p>The formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.</p> <p>B. Delivering Appropriate Support Services</p> <p>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:</p> <ul style="list-style-type: none">• Understand the benefits of participating in the FSS program and how the program can help the family achieve its goals.• Identify interim and final goals for participation in the FSS program, break down the goals into achievable steps and coach 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 referrals to appropriate service providers.• Overcome obstacles in the way of achieving a family’s goals.
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	<ul style="list-style-type: none"> • The FSS Coordinator will follow-up on the effectiveness of the referrals throughout the CoP and provide alternative resources and support as needed to help the participant remove barriers and achieve their goals. <p>C. Transitional supportive service assistance.</p> <p><input checked="" type="checkbox"/> Option 1: 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, Central Oregon Regional Housing Authority will try to help these families with appropriate referrals. The time spent on these referrals will not be covered by funds designated by HUD to support the FSS program.</p>
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IX. Contract of Participation

<p>Instructions: You are not required by regulation to include a section on the Contract of Participation (CoP) in the FSS Action Plan. However, such a section may help you explain to readers what the Contract is and how your program will implement it.</p> <p>In addition, the sample Action Plan addresses in this section several of the policies referenced under “optional additional information” in 24 CFR 984.201(d)(13) the FSS Rule.</p> <p>(see 24 CFR 984.103 (CoP Effective date),</p> <p>24 CFR 984.303(c) (Term of CoP),</p> <p>24 CFR 984.303(d) (Extensions of CoP),</p> <p>24 CFR 984.303(f) (Modification of the CoP),</p>	<p>Contract of Participation</p> <p>All families enrolled in the FSS program will be required to sign a Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). This section describes the contents of the CoP and the Central Oregon Regional Housing Authority’s policies and practices regarding the CoP.</p> <p>A. Form and content of contract</p> <p>The CoP, which will incorporate one ITSP for each participating member of the family, sets forth the principal terms and conditions governing participation in the FSS program. These include the rights and responsibilities of the FSS family and of the Central Oregon Regional Housing Authority, the services to be provided to, and the activities to be completed by, each adult member of the FSS family who elects to participate in the program.</p> <p>B. ITSP goals</p> <p>Each individual’s ITSP will establish specific interim and final goals by which the Central Oregon Regional Housing Authority and the family will measure the family’s progress towards fulfilling its obligations under the CoP. For any FSS family that is a recipient of welfare assistance at the outset of the CoP or that receives welfare assistance while in the FSS program, the Central Oregon Regional Housing Authority will establish as a final goal that every member of the family become independent</p>
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24 CFR 984.303(g) (Completion of the CoP)) and

24 CFR 984.304(d) (Contract of Participation Extension).

Policy Decisions: In completing this section, you will need to make the following policy decisions:

1. Whether and under what circumstances to grant extensions of FSS CoPs.
2. Acceptable methods for documenting completion of CoPs. (Select the appropriate option.)
3. Timing limitations (if any) on when participants may modify their ITSPs. (Select the appropriate option.)
4. Policies on the consequences of non-compliance with the terms of the CoP.

from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS Coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

C. Determination of suitable employment

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

D. Contract of Participation term and extensions

The CoP will go into effect on the first day of the month following the execution of the CoP. The initial term of the CoP will run the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. Families may request up to two one-year extensions and are required to submit a written request that documents the need for the extension. **Central Oregon Regional Housing Authority** will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

- (i) Circumstances beyond the control of the FSS family, as determined by the **Central Oregon Regional Housing Authority**, such as a serious illness or involuntary loss of employment;
- (ii) Active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension (e.g. completion of a college degree during which the participant is unemployed or under-employed, credit repair towards being homeownership ready, etc.) as determined by the **Central Oregon Regional Housing Authority** or
- (iii) Any other circumstances that the **Central Oregon Regional Housing Authority** determines warrants an extension, including death of Head of FSS family to allow a new Head of FSS family to establish and complete goals outlined in their new ITSP.

E. Completion of the contract

The CoP is completed, and a family’s participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members’ ITSPs, on or before

the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed. The **Central Oregon Regional Housing Authority** will accept the following form of verification for completion of the ITSP goals:

Option 3: The **Central Oregon Regional Housing Authority** will require a combination of self-certification and third-party verification to document completion of ITSP goals.

Self-certification is documented and signed by the Head of FSS Family on Central Oregon Regional Housing Authority's FSS program exit form.

F. Modification

The **Central Oregon Regional Housing Authority** and the FSS family may mutually agree to modify the CoP with respect to the ITSP and/or the contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by the **Central Oregon Regional Housing Authority** as well as the Head of FSS Family.

The **Central Oregon Regional Housing Authority** will allow for modifications to the CoP under the following circumstances:

When the modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency

When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, after consultation with the **Central Oregon Regional Housing Authority** designate another family member to be the FSS head of family

When a relocating family is entering the FSS program of a receiving *PHA* and the start date of the CoP must be changed to reflect the date the new CoP is signed with the receiving *PHA*

Other: At the request of the Head of FSS Family and mutual agreement with the FSS Coordinator

Option 1: The **Central Oregon Regional Housing Authority** will allow modifications at any time during the term of the CoP

	<p>G. Consequences of noncompliance with the contract</p> <p>Participant non-compliance with the CoP may result in termination from the FSS program. See policies on Involuntary Termination in Section X(A).</p>
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X. Program Termination, Withholding of Services, and Available Grievance Procedures

<p>Instructions: Describe your FSS program’s policies for terminating or withholding supportive services or FSS participation for failure to comply with the Contract of Participation. Include a description of the grievance and hearing procedures available to FSS families.</p> <p>(See 24 CFR 984.201(d)(9) and FSS Guidebook Section 2.3 Contract of Participation and Individual Training and Services Plan)</p> <p>Policy Decisions: In completing this section, you will need to make the following policy decisions:</p> <ol style="list-style-type: none"> 1. Your FSS program’s approaches and procedures assessing and executing involuntary termination from the FSS program. 2. Your FSS program’s policy on voluntary terminations. 3. Your FSS program’s grievance procedures, including timelines, 	<p>Program Termination</p> <p>A. Involuntary Termination</p> <p>The Central Oregon Regional Housing Authority may involuntarily terminate a family from FSS under the following circumstances:</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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. <p>Participants who fail to meet their obligations under paragraph I above, as determined by an FSS Coordinator, the FSS Coordinator will follow the communication procedures below to provide the FSS participant multiple opportunities to respond to requests to reengage with the FSS program and become compliant with their CoP.</p> <ul style="list-style-type: none"> • Documented minimum of three consecutive attempts to contact client have failed • Mail Communication Notice requesting to contact FSS Coordinator • Mail Pre-Termination Notice Letter
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<p>modes of communication, settings, and individuals involved.</p>	<ul style="list-style-type: none"> • If no response from FSS participant, mail Final Termination Letter with Hearings Request Form • If no response, mail notice of termination with Hearing Request Form and FSS exit date <p>The participant will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned Central Oregon Regional Housing Authority representative to review the situation. At this meeting, a review of the Contract of Participation, Individual Training and Services Plan, and all related documentation will be conducted, and amendments will be made as necessary (within HUD guidelines) to allow for changes in circumstances. Failure to contact the FSS Coordinator to schedule this meeting within fourteen (14) days of a written request by the FSS program to set up this a meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue(s), may lead to termination from the program. The FSS Coordinator will also attempt to contact the participant via phone, text, in person and/or email prior to the review meeting. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program.</p> <p>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:</p> <ol style="list-style-type: none"> 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 <i>Grievance Procedures</i>); 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. <p>B. Voluntary Termination</p> <p>Participants may also be terminated from the FSS program under the following circumstances:</p> <ul style="list-style-type: none"> • Mutual consent of both parties; and/or • The family’s withdrawal from the program.
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C. Termination with Escrow Disbursement

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

- (i) Services that the **Central Oregon Regional Housing Authority** and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.
- (ii) The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the **Central Oregon Regional Housing Authority** and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- (iii) An FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR §982.353) for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

D. Grievance Procedures

All requests for an informal hearing must be received by **Central Oregon Regional Housing Authority** FSS Coordinator within 13 business days (includes 3 days for mailing) of the date of the FSS termination letter. If a hearing is requested by the FSS family, notification to the family regarding the date, time, and location of the informal hearing will be made by mail.

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

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

All participants have the right to obtain legal representation and provide their witnesses. The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

Central Oregon Regional Housing Authority's current Administrative Plan details its grievance and hearings rescheduling procedure located at: <https://housing-works.org/policies/>.

XI. Assurance of Non-Interference

<p>Instructions: Include a statement here that provides an assurance that a family’s election not to participate in the FSS program will not affect the family’s participation in the rental assistance program.</p> <p>(see FSS Guidebook Section 1.2 What is FSS and Why is it Important?)</p>	<p>Assurance of Non-Interference</p> <p>Participation in the FSS Program is voluntary. A family’s decision on whether to participate in FSS will have no bearing on the Central Oregon Regional Housing Authority’s decision of whether to admit the family into the Housing Choice Voucher Rental Assistance 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.</p> <p>Central Oregon Regional Housing Authority will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.</p>
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XII. Timetable

<p>Instructions: Provide a schedule for program implementation and for filling all FSS slots with eligible FSS families.</p> <p>Separate options have been provided for FSS programs that have already started or have not yet started.</p> <p>(see FSS Guidebook Section 2.2 Outreach and Enrollment)</p>	<p>Timetable</p> <p><input checked="" type="checkbox"/> Option 1: Central Oregon Regional Housing Authority implemented its FSS program in 1992 and will continue to implement it per this FSS Action Plan.</p>
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XIII. Reasonable Accommodations, Effective Communications, and Limited English Proficiency

Instructions: Reasonable accommodations and effective communications for persons with disabilities are required by federal law. While there is no specific requirement in the program regulations to describe in the FSS Action Plan the agency’s policy on reasonable accommodations and effective communications, inclusion of this section in the Action Plan can be helpful for reinforcing the commitment of the PHA/owner to these important policies. The sample plan also describes the agency’s commitment to meeting the needs of people with Limited English Proficiency.

Reasonable Accommodations, Effective Communications and Limited English Proficiency Requirements

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 in the current HUD approved Administration Plan located at: <https://housing-works.org/policies/>.

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 in the current HUD approved Administration Plan located at: <https://housing-works.org/policies/>.

Limited English Proficiency

The **Central Oregon Regional Housing Authority** will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available online at The policy is available online in the current HUD approved Administration Plan located at: <https://housing-works.org/policies/>.

XIV. Coordination of Services

XIV.A Coordination of Services (PHAs only)

Instructions: Certify that the development of the services and activities scheduled to be provided under the FSS program has been coordinated with public and private providers, including 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. In this certification, you should further specify that implementation will continue to be coordinated with these local public and private providers to avoid duplication of services.

Note: PHAs should include here a description of the Program Coordinating Committee. (This provision does not apply to multifamily owners.)

(See 24 CFR 984.201(d)12, 24 CFR 984.202 and FSS Guidebook Sections 3.3 Referrals to Service Providers and 6.1 Building Partnerships)

Coordination of Services

A. Certification of Coordination

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

B. Program Coordinating Committee

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

The role of the PCC is to:

- Meet regularly to review the objectives of the program
- Leverage community services for families
- Provide direct access to FSS participants to PCC member agencies
- Advocate for program participants
- Promote self-sufficiency by assisting in policy changes that would address gaps in community services
- Development and review of the FSS action plan and program implementation.

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

	<ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • COIC/Worksource (State employment and training agency) • NeighborImpact (multi-service non-profit agency, HUD Certified Housing Counseling Agency) • Deschutes Public Library • Oregon State University Extension • Central Oregon Black Leaders Assembly • loanDepot (mortgage broker) • Family Access Network (basic-needs services to children in Central Oregon) • Saving Grace (domestic violence and sexual assault services) • Thrive Central Oregon (community social service agency) • St. Charles (regional hospital and largest Central Oregon employer) • Abilitree (disability services) • East Cascades Workforce Investment Board • Kôr Community Land Trust (affordable homeownership developer) • Deschutes County Behavioral Health • Veteran’s Affairs
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XV. FSS Portability (Applicable to HCV Only)

<p>Instructions: While not specifically required by the federal program regulations, it can be helpful to include a section describing how the program will approach portability. (see 24 CFR 984.306 and FSS Guidebook Section 6.7 Portability in the FSS Program)</p>	<p>Portability</p> <p>A. Portability in initial 12 months</p> <p><input checked="" type="checkbox"/> Option 1: While Central Oregon Regional Housing Authority is not required to allow FSS participants to exercise portability within the initial 12 months after signing a CoP, it is the policy of</p>
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Policy Decisions: In completing this section, you will need to make the following policy decision:

1. Whether your FSS program will allow portability in the first 12 months of enrollment.
2. Under what circumstances your FSS program will accept FSS participants porting into your FSS program from another jurisdiction's FSS program.
3. Under what circumstances your FSS program will agree to a family porting into your agency's jurisdiction to remain in the initial agency's FSS program (provided that the initial PHA agrees to retain the family in its program and demonstrates that the family meets conditions under 24 CFR 984.306(b)1 to fulfill its responsibilities under the initial CoP).

Central Oregon Regional Housing Authority to allow for portability within this period to the extent feasible.

B. Moves into the PHA's jurisdiction

An FSS family moves to the jurisdiction of a receiving PHA that administers an FSS program.

(1) Whether the receiving PHA bills the initial PHA or absorbs the FSS family into its HCV program, the receiving PHA must enroll an FSS family in good standing in its FSS program; unless

(i) The receiving PHA is already serving the number of FSS families identified in its FSS Action Plan and determines that it does not have the resources to manage the FSS contract; or

(ii) The receiving PHA and the initial PHA agree to the FSS family's continued participation in the initial PHA's FSS program. Prior to the PHAs agreeing to the continued participation, the initial PHA must determine that the relocating FSS family has demonstrated that, notwithstanding the move, it will be able to fulfill its responsibilities under the initial or a modified CoP at its new place of residence. For example, the FSS family may be able to commute to the supportive services specified in the CoP, or the family may move to obtain employment as specified in the contract.

(2) Where continued FSS participation is not possible in accordance with paragraph (b)(1) of this section, the initial PHA must clearly 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 § 984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS program.

C. FSS termination with disbursement for porting families

An FSS family moves to the jurisdiction of a receiving PHA that does not administer an FSS program. If the receiving PHA does not administer an FSS program, the FSS family may not continue participation in the FSS program. The initial PHA must clearly 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 with FSS escrow disbursement in accordance with § 984.303(k)(1)(iii), termination of the FSS contract and forfeiture of escrow, or locating a receiving PHA that administers an FSS program.

	<p style="text-align: center;">D. Single FSS escrow account</p> <p>Regardless of whether the FSS family remains in the FSS program of the initial PHA or is enrolled in the FSS program of the receiving PHA, the family will have only one FSS escrow account. If the receiving PHA is billing the initial PHA, the account will be maintained by the initial PHA. If an FSS family will be absorbed by the receiving PHA, the initial PHA will transfer the family's FSS escrow account funds to the receiving PHA and the receiving PHA will maintain the funds in its FSS account.</p>
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XVI. Other Policies

<p>Instructions: Describe any other FSS program-related policies over which your program has discretion that are not covered above.</p> <p>The Sample Action Plan lists the local discretionary policies specifically identified under the section “optional additional information” in 24 CFR 984.201(d)13 and specifies in which section of this sample action plan each is included. Including a table like this one in your Sample Action Plan will make it easier to find policies that could be included under more than one heading.</p>	Other Policies	
	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: N/A
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XVII. Definitions

Definitions

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

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

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

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

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

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

Enrollment means the date that the FSS family entered into the CoP with the **Central Oregon Regional Housing Authority**.

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

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

FSS escrow credit means the amount credited by the **Central Oregon Regional Housing Authority** to the FSS family's FSS escrow account.

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

FSS family in good standing means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the **Central Oregon Regional Housing Authority**; and is in compliance with the regulations regarding participation in the relevant rental assistance program.pro

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

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

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

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

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

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

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

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 a **Central Oregon Regional Housing Authority** will coordinate on behalf of an FSS family under a CoP, which may include, but are not limited to:

- (1) *Childcare*—childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- (2) *Transportation*—transportation necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment;
- (3) *Education*—remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;
- (4) *Employment Supports*—job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;
- (5) *Personal welfare*—substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services;
- (6) *Household management*—training in household management;
- (7) *Homeownership and housing counseling*— homeownership education and assistance and housing counseling;
- (8) *Financial Empowerment*—training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing and improving credit scores, etc.;
- (9) *Other services*—any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD’s legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act.

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

- (1) Nonrecurrent, short-term benefits that:
 - (i) Are designed to deal with a specific crisis or episode of need;
 - (ii) Are not intended to meet recurrent or ongoing needs; and,
 - (iii) Will not extend beyond four months.
- (2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- (3) Supportive services such as childcare and transportation provided to families who are employed;
- (4) Refundable earned income tax credits;

(5) Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF);

(6) Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;

(7) Amounts solely directed to meeting housing expenses;

(8) Amounts for health care;

(9) Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;

(10) Supplemental Security Income, Social Security Disability Income, or Social Security; and

(11) Child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child's need and not on the need of the child's current non-parental caretaker.

Andrew Hall

From: Trepinski, Chad <Chad.Trepinski@hud.gov>
Sent: Wednesday, October 30, 2024 10:31 AM
To: Andrew Hall
Subject: Housing Works FSS Action Plan revision approval
Attachments: Central Oregon Regional Housing Authority OR34 2024 FSS Action Plan.pdf; Action Plan Amendment-Proposal.docx

Andy,

I received your email dated October 9 with a summary of proposed changes to one section of Housing Works FSS Action Plan, i.e., **VI. FSS Escrow Account and Other Incentives for Participants**, sub-section **B. Interim Disbursement** and sub-section **C. Uses of forfeited escrow funds** (including **Treatment of forfeited FSS escrow account funds** and **Prioritization of Forfeited Funds Distribution**.) Housing Works proposed changed and revised 2024 FSS Action Plan is consistent with the FSS Final Rule and is hereby acknowledged and approved.

Feel free to contact me if you have any questions or concerns. Thanks.

Chad Trepinski
Office of Public Housing

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1220 SW Third Ave, Suite 400
Portland, Oregon 97204-2825
Phone: (971) 222-2669

From: Andrew Hall <ahall@housing-works.org>
Sent: Monday, October 28, 2024 9:31 AM
To: Trepinski, Chad <Chad.Trepinski@hud.gov>
Subject: RE: <External Message> Question

Hi Chad,

Thank you for your careful review and guidance. I have made the changes to the Action Plan and I have attached it for your signature.

Please let me know if you have any questions. Have a great week.

Take care,
Andrew Hall
Housing Works
FSS Program Manager
541-323-7413 -Redmond Office Tu & Thursday
458-281-0814 – Bend Office M-W-F
541-550-7699 VOIP Phone

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