



FAMILY SELF SUFFICIENCY

ACTION PLAN

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SOUTHERN NEVADA REGIONAL HOUSING AUTHORITY

Supportive Services Department

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FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN

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PURPOSE:

The purpose of the US Department of Housing and Urban Development's (HUD) Family Self Sufficiency Program (FSS) is to promote the development of local strategies to coordinate the use of housing assistance with public and private resources to enable eligible families to achieve economic independence and self-sufficiency. The Southern Nevada Regional Housing Authority's (SNRHA) FSS Program is designed to promote employment opportunities and increase asset building among families living in assisted housing. The three main features of the FSS Program are: (1) case management; (2) delivery of the services; (3) the creation of an escrow account.

SNRHA runs a combined Public Housing (PH) and HCV FSS program and there is one Action Plan governing both.

BENEFITS OF OPERATING A VOLUNTARY FSS PROGRAM:

An aggressive and innovative FSS program will yield numerous, positive benefits such as:

- A direct increase in the number of working families enrolled in the FSS program.
- An increase in earned income which directly results in a reduction of rental subsidy.
- Increase resident self-sufficiency through knowledge of community resources
- Increase families' earning capacity which will strengthen community

PROGRAM COORDINATING COMMITTEE (PCC):

The purpose of the SNRHA PCC is to ~~discuss~~ and provide resources to address the challenges of the FSS families SNRHA will have letters of agreement or will enter into Memorandums of Understanding (MOU) with community partners to provide services/resources to our participants.

PCC membership is composed of a cross section of service providers, sponsors of skills-based training, community partners, employers, FSS program participants and SNRHA staff. In alliance with HUD's requirement, SNRHA's PCC membership shall include the following:

- A Public Housing (PH) resident and a Housing Choice Voucher (HCV) participant who has currently or previously received public assistance and has successfully completed or is currently enrolled in a self-sufficiency or welfare-to-work related program and is in compliance with these program obligations;
- SNRHA FSS Coordinators;

SNRHA's PCC ~~also~~ includes:

- Local agency representatives which administer employment and training programs
- Representatives from area employers
- Representatives from private employment agencies
- Representatives from financial institutions
- Representatives from local post-secondary educational institutions
- Representatives from local welfare agency
- Child care providers
- Representatives from the non-profit sector
- All Onsite Service Providers (at least one representative from each provider)

CERTIFICATION OF COORDINATION:

The development and retention of viable, extensive partnerships with the public and private sector are paramount to the success of the FSS Program. SNRHA will coordinate and partner with entities e.g. the Department of Welfare and Social Services (DWSS), Workforce Innovations and Opportunities Act (WIOA) funded partners, College of Southern Nevada, etc.

GOALS AND OBJECTIVES:

SNRHA's Family Self-Sufficiency (FSS) program goals are to work with welfare agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a living wage, be free from government assistance and reduce barriers that would prevent self-sufficiency e.g. lack of educational credentials, transportation, child care, etc.

In order to obtain self-sufficiency, participating families are introduced to individualized case management where obstacles are identified so that suitable goals can be set. Appropriate services are then identified to promote successful attainment of these goals. Participants are encouraged to attend a number of self-help workshops and seminars coordinated by SNRHA.

Goals of the FSS Program are achieved through:

- One-on-one counseling with SNRHA FSS Coordinators to emphasize the importance of education and training to increase earning potential
- Career and personal case management by SNRHA FSS Coordinators and community partners to set realistic goals and timeframes
- Strategies that encourage employment, entrepreneurship, and homeownership
- Referrals to community support services
- Incentives and recognition for achievements (i.e. escrow savings account, achievement highlights in the agency newsletter and/or other communication tools)

PROGRAM MEASUREMENTS:

The FSS Program will measure the success of families who participate in the program and achieve self-sufficiency, or accomplish similar goals, by tracking:

- Family members who seek and maintain suitable employment defined as work reasonably related to an individual's skills, qualifications and training
- Family members who get higher paying jobs
- Family members who get a GED or higher educational degrees
- Family members who no longer receive welfare benefits

PROGRAM SIZE:

SNRHA will operate a minimum program size of up to 525, of which 99 slots are mandatory as of January 31, 2017; the others are voluntary. As the mandatory size decreases, the voluntary size will increase.

ESTIMATE OF POTENTIAL PARTICIPATING FAMILIES:

The Housing Authority owns 2651 Public Housing units, has 323 Rental Assistance

Demonstration (RAD) units and administers 11,284 Housing Choice Vouchers which together provide housing assistance to over 35,000 residents. Of these numbers, the estimate of eligible FSS families who can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated Federal, tribal, State, local, and private resource are approximately 525.

The FSS Program is open to all adults, ages 18 and over, without regards to race, color, religion, sexual orientation, age, disability, familial status or national origin. SNRHA does not wish to operate a joint FSS program with other PHAs.

SUPPORTIVE SERVICES NEEDS:

The following represents some of the most needed supportive services for program participants:

- Education
 - High School Equivalency Test (HiSET) preparation
 - Postsecondary education preparation
 - English as a second language (ESL)
 - Computer training

- Life Skills
 - Domestic Violence awareness and prevention
 - Home management
 - Self-enrichment
 - Child care
 - Parenting and child development
 - Transportation

- Financial Literacy
 - Credit counseling
 - Budgeting
 - Asset building
 - Debt management
 - Homebuyer education

- Employment
 - Vocational training
 - Resume building
 - Effective job search
 - Interview skills and techniques
 - Job placement and retention

- Healthcare
 - Affordable health care
 - Social services
 - Addiction prevention

INCENTIVES TO ENCOURAGE PARTICIPATION

SNRHA offers many incentives to encourage FSS Program participation, including the following services:

- Individual case management

- Links to community resources
- Escrow account credits
- Homeownership opportunities

ASSURANCE OF NON-INTERFERENCE

The decision, by family, to participate or not in the FSS Program, will not affect their right to admission in the Public Housing or Housing Choice Voucher programs, or their right to occupancy in accordance with their lease.

FAMILY SELECTION PROCEDURES:

In accordance with applicable federal regulations, families are selected without regard to race, color, religion, sex, handicap, familial status or national origin. SNRHA observes all federal regulations related to FSS participation for all applicants.

The HOH must sign the COP before other family members can participate.

The program participant must be:

- A current SNRHA resident/participant, 18 years or older

SNRHA FSS Coordinators will use multiple methods to inform and recruit eligible program participants. Promotional materials are distributed to existing residents and to applicants who are near completion in the lease-up process. These materials include flyers, posters, FSS brochure, and interest form. These materials highlight program information and benefits.

Several other outreach methods will be used to encourage FSS Program participation:

- The FSS informational brochures and interest forms will be available in SNRHA lobbies, administrative offices, management offices and/or distributed upon request
- The FSS department may mail brochures, annually, to all eligible households
- FSS presentations may be conducted during any resident informational sessions
- FSS Orientation sessions are held twice a month; including at least one Saturday each quarter

The FSS application process is as follows:

- The HOH must submit an interest form
- FSS Coordinators will verify the status of the resident. • Eligible HOH will be invited and must attend an orientation session, if not; the family will be removed from the Interest List. The orientation sessions will be held at various times on at least two different days, per month
- During the orientation session, detailed program information will be shared to assist the HOH in making the decision to participate
- If the HOH decides to participate, a Pre-Assessment Form must be completed
- If the HOH decides not to participate, the family will be removed from the Interest List

The Pre-Assessment Form is a tool that will be used to establish a base level of need. It will be used for case management purposes only, to determine the participant's level of education, job skills, prior work experience, career interests and program readiness. It will not be used to screen-out any participant.

METHOD FOR IDENTIFICATION OF SUPPORTIVE SERVICE NEEDS:

The FSS Coordinator will provide ongoing coordination and encouragement to the FSS family. A critical factor in the provision of case management services is regular communication between the Coordinators and their assigned families. All newly enrolled participants are strongly encouraged to meet with their Coordinator monthly, for the first three (3) months and quarterly thereafter. Assessment of the participant's needs and their ongoing progress continues throughout the length of the FSS Contract of Participation (COP). Employment and career development plans are made based on the assessment.

CONTRACT OF PARTICIPATION

The COP will be discussed in detail with eligible family members, prior to being signed by the HOH. Other household members, 18 or older, may enroll in the FSS Program at any time. These household members will be required to work one-on-one with the FSS Coordinator to develop and sign their own Individual Training and Service Plan (ITSP).

The enrollment process is complete once the HOH and the FSS Coordinator sign the COP.

The COP must include:

- a. ITSP
- b. A list of interim goals, one of which must be that all family members receiving TANF, are off welfare assistance and remain independent for at least 12 consecutive months before the contract expires
- c. Final goals
- d. The "seek and maintain suitable employment" clause which includes employment, interviews, and other activities related to job search. A determination of suitable employment shall be made by SNRHA based on the skills, education, and job training of the HOH and based on the available job opportunities within the jurisdiction served by SNRHA
- e. Baseline information – annual income, earned income and Total Tenant Payment (TTP) for Public Housing residents / and 30% of monthly adjusted income for HCV participants

During the term of the COP, changes may be made to the ITSP within the first four years of the original contract date, or unless there is an approved reasonable accommodation.

- Changes to ITSP - The FSS Coordinator will assist the client with changes.
- Changes to designated HOH - PH Management or HCV Management staff will make the determination to accept or reject the proposed HOH change.

The FSS participant has a right to grieve any negative decision(s) and may appeal within ten (10) calendar days. The participant shall have the opportunity to present written or oral objections to the Director of Supportive Services.

Case Files

The FSS Coordinator will maintain a family case file for each FSS family. The file will contain the following documents:

- Contract of Participation
- ITSP(s)

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- Interest form, FSS pre-assessment & assessment forms
- Escrow calculations and tracking forms
- Documentation of program participation
- Case notes detailing each contact with the participating family
- Extension and other related forms and letters
- Referral letters and other relevant correspondence
- Termination forms
- Other required forms, notices and correspondence

Escrow Account Management

Escrow accounts are to be maintained for each family who has earned escrow credits. The escrow calculation allocates monthly savings amounts for each family, based on increases in their rent due to increases in their earned income.

The annual or interim recertification exam determines when and how much change there will be to the Total Tenant Payment (the tenant's portion of the rent and utilities), which will then result in changes to the escrow accruals.

(Special Notice: HUD approved income exclusions will affect the FSS escrow account accruals.)

FSS escrow funds are combined and placed in a HUD-approved investment instruments. The interest paid on the actual investment will be credited to the individual FSS escrow accounts **annually**. The participant will receive an escrow statement annually. This statement will include the current monthly escrow credit along with the total escrow from beginning to ending balance and total interest accrual.

Interim Escrow Withdrawals

A HOH may be permitted to withdraw escrow funds for program and/or supportive services expenses such as completion of higher education, job training or start-up expenses for new business,¹ however, the participant must:

- Have exhausted all other resources
- Not owe a debt to SNRHA (unless the participant is current with a repayment agreement)
- Be in program compliance with both FSS and SNRHA
- Submit a written request and documentation of the need to the FSS Coordinator
- Have attended one FSS Support Group workshop within the last 6 months
- Be actively pursuing FSS goals
- Use the escrow funds for purposes of meeting ITSP goals only; otherwise the participant will be terminated from the FSS program
- Provide receipt(s) verifying expenditure(s)

All written requests for interim disbursements will be submitted to the Director of Supportive Services, after the FSS Coordinator and the Resident Program Coordinator (RPC) have reviewed the request, to determine the adequacy of documentation and the level of need. The Director of Supportive Services (DSS) has final approval.

The FSS Coordinator will inform the participant of the request results.

- If the request is approved, the interim escrow distribution check will be prepared within 10 business days.

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- Within 10 business days after the escrow funds are received; the participant must provide documentation/receipt(s).
- Failure to provide documentation/receipts, participant will be terminated from the FSS program.
- If the request is denied, the FSS Coordinator will mail, to the participant, a written notification stating the reason(s) for denial.
- There is no appeal process for interim disbursement requests

1 The withdrawal is limited to once during the life of the COP. The escrow withdrawal cannot exceed 20% of total escrow amount, except for homeownership expense, which cannot exceed 90% of total cannot escrow.

Program Extensions

Contract extensions may be approved, up to two years, for active FSS participants under the following conditions:

- The participant demonstrates active participation and progress in the FSS program;
- FSS Contract goals have not all been met, but can realistically be reached within the extension period;
- Goals which have not been met due to circumstance beyond the control of the participant – loss of employment, medical issues, death in the family, etc.
- More time is needed for the participant to be free from welfare cash assistance for 12 continuous months.

To request a program extension, the FSS participant must submit a written request to the FSS Coordinator. The written request must include the reason(s) for requesting the extension. To determine if an extension is warranted, the FSS Coordinator will review the request, program compliance and progress with the participant.

The FSS Coordinator will submit to the RPC, a written recommendation for review. The RPC will submit same to the DSS for final approval.

There is no grievance process available when an extension is denied.

Successful Completion of the Program

Successful completion of the FSS Program occurs at any time during the FSS COP, if the following conditions are met, and the participant:

- Has obtained suitable employment and achieved his/her personal goals stated on the FSS COP; and
 - SNRHA has certified that family members have not received welfare cash assistance during the previous twelve consecutive months;
- or -
- 30% of the family's monthly adjusted income equals or is greater than the Fair Market Rent amount for the unit size for which the family qualifies.

FSS participants may successfully complete the program in less than the five-year COP term, if they have met all other requirements. Successful program graduates are not required to leave subsidized housing.

The full balance of escrow, less any outstanding debt to SNRHA, will be given to the HOH

within 30 days after the effective date of program completion.

There are no restrictions on the use of the escrow funds, and the U.S. Internal Revenue Service has ruled that these funds are not subject to federal income tax.

Participants who have successfully completed the FSS program are not eligible for re-enrollment.

PROGRAM TERMINATION:

Voluntary

Participation in the FSS Program is voluntary. Participants may withdraw from the program at any time. This request will be honored without penalty regarding the family's housing status. Should the HOH withdraw, the FSS escrow account will be forfeited. The family may re-apply to the FSS Program after a minimum twelve months unless otherwise approved by the DSS.

Involuntary

Reasons for involuntary termination from the FSS program include:

- ❖ Adverse loss of housing assistance
- ❖ Failure to fulfill responsibilities under the COP
- ❖ An act occurs that is inconsistent with the purpose of the FSS program

The FSS escrow account will be forfeited. The family may re-apply to the FSS Program after a minimum of twelve months unless otherwise approved by the DSS.

Mutual Consent

The HOH and the FSS Coordinator may mutually agree to terminate participation in the FSS Program. The FSS escrow account will be forfeited.

Grievance Procedure

In the event that the FSS Coordinator terminates a participant from the program, a termination letter will be mailed to the participant clearly stating the reason(s) for the decision. The participant will have ten (10) business days, from the date of the letter, to contact the Resident Program Coordinator (RPC) or designee.

Written decision notification from the RPC or designee shall be issued to the participant within ten (10) business days. If the participant does not agree with the decision of the RPC, they may request a review of the decision with the DSS.

If the participant does not agree with the decision of the DSS, they may request a hearing with the SNRHA Hearing Officer, according to guidelines established in the Admissions and Occupancy Policy (ACOP) for Public Housing residents or Administrative Plan for Housing Choice Voucher participants.

Portability

Port-ins from other FSS Programs will be welcomed into the SNRHA Family Self-Sufficiency

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Program, if open slots are available. If slots are not available, the family will be placed on the Interest Form List according to the date and time that the request was received. A new COP will be executed for the remaining time of the initial Contract.

CHANGES TO THE ACOP & ADMINISTRATIVE PLAN

SNRHA recognizes that the implementation of this FSS Action Plan is a dynamic process, which may need to incorporate changes/revisions to current policies and procedures to be an effective working tool for staff.

SNRHA will review HUD FSS regulations and PIH notices as needed, to ensure that the FSS Action Plan is consistent. Any necessary changes will be made to SNRHA policy as appropriate.