

Lee County Housing Authority FSS Action Plan

Revised 08/05/2022

I. **Introduction**

This document constitutes the Family Self-Sufficiency Program Action Plan for the FSS program operated by Lee County Housing Authority (LCHA). It was submitted to HUD on September 06, 2022.

The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of HUD assistance with public and private resources in order to enable eligible families to make progress toward economic security.

The purpose of the FSS Action Plan is to establish policies and procedures for carrying out the FSS Program in a manner consistent with HUD requirements and local objectives.

This FSS Action Plan describes the LCHA's local policies for operation of the FSS Program in the context of federal laws and regulations. The FSS Program will be operated in accordance with applicable laws, regulations, notices and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.

The FSS Program and the functions and responsibilities of PHA staff are consistent with the LCHA's personnel policy and Agency Plan.

II. **Program Objectives**

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

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

III. Program Size and Characteristics

Family Demographics-

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

The FSS Program will serve the following housing assistance programs:

- Public Housing (LIPH)
- Housing Choice Vouchers (HCV)
- Project Based Vouchers (PBV)
- HCV Special Purpose Vouchers
 - VASH
 - FUP
 - Mainstream

Ages of Head of Household and Other Adults	Percent
Head of Household is age 24 or younger	20%
Head of Household is age 25 to 50	30%
Head of Household is age 51 to 61	25%
Head of Household is age 62 or greater	1%
Other Adults in Household is age 24 or younger	4%
Other Adults in Household is age 25 to 50	10%
Other Adults in Household is age 51 to 61	10%
Other Adults in Household is age 62 or greater	0%

Presence and Ages of Children	Percent
Households that only include adults over age 18	10%
Households that include one or more children age 13 to 17	45%
Households that include children age 12 or younger	45%

Employment Status of Population to be Served	Percent
Families with an employed Head of Household	40%
Families with an unemployed Head of Household	20%
Families with any employed household member	20%
Families with no employed household member	20%

Annual Earned Income of Population to be Served	Percent
Annual household earnings less than \$5,000	10%
Annual household earnings between \$5,000 and \$9,999	10%
Annual household earnings between \$10,000 and \$14,999	10%
Annual household earnings between \$15,000 and \$19,999	10%
Annual household earnings between \$20,000 and \$24,999	25%
Annual household earnings between \$25,000 and \$29,999	25%
Annual household earnings between \$30,000 and \$34,999	5%
Annual household earnings of \$35,000 or higher	5%

Elderly/Disability Status of Population to be Served	Percent
Head of Household is an elderly person without disabilities	1%
Head of Household is an elderly person with disabilities	1%
Head of Household is a non-elderly person without disabilities	50%
Head of Household is a non-elderly person with disabilities	10%
Household includes an elderly person without disabilities	1%
Household includes an elderly person with disabilities	1%
Household includes a non-elderly person without disabilities	20%
Household includes a non-elderly person with disabilities	6%
Household includes no elderly persons or persons with disabilities	10%

Race and Ethnicity of Population to be Served			
Race		Non-Hispanic	Hispanic
White	59%	35%	65%
Black or African America	39%	0%	0%
American Indian or Alaska Native	1%	0%	0%
Asian	1%	0%	0%
Native Hawaiian or Pacific Islander	0%	0%	0%
Other Race	0%	0%	0%

III.B

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 LCHA FSS Program:

- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerated basic skills instruction
- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a second language
- Assistance accessing and paying for child care
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Access to counseling or treatment for substance abuse and mental health
- Dental care, health care, and mental health care including substance abuse treatment/counseling
- Homeownership readiness

This list of supportive services needs is based on experience with past FSS or other supportive service program participants and input from the PCC or other service provider partners.

III.C

Estimate of Participating Families

Over time, LCHA hopes to serve all families who are interested the 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 LCHA has been funded for 1 Coordinator. The minimum number of participants to be served based on this funding is 50.

Minimum Program Size: In accordance with CFR 984.105, the LCHA has a remaining FSS Program mandate to serve 72 families. This is calculated based on the table below. This is our best estimate at this time, and it included the mandate for both the Public Housing and HCV Programs and counts graduated from both programs.

Original Number of Participants Mandated in both HCV and PH	FSS Graduates from both HCV and PH	Remaining Mandatory Slots
79	7	72

Therefore, as of the time of preparation of this Action Plan, the LCHA expects to be able to serve 72 families in the FSS program at any one time.

III.D Other Self-Sufficiency Programs

The LCHA expects to enroll into FSS families from the self-sufficiency programs below:

- Family Unification Program- Family (FUP-F)
- Resident Opportunity and Self-Sufficiency (ROSS)
- Veterans Affairs Supportive Vouchers (VASH)

IV. Family Selection Procedures

A. Waiting List

A waiting list will be maintained for families whose applications cannot be accepted at the time of initial application due to program capacity limits. The waiting list will include the name and contact information for the Head of Household of the applicant family and the date of their application.

B. Admission Preferences

The LCHA FSS Program has not adopted any admissions preferences. Families will be selected based on the date the family expressed an interest in participating in the FSS program.

C. Screening for Motivation

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

D. Compliance with Nondiscrimination Policies

It is the policy of LCHA 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, LCHA'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 Reasonable Accommodations).

The FSS Program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS Coordinator 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 time, LCHA will select families

for participation in the FSS Program in accordance with FSS regulations and HUD guidelines.

E. Re-enrollment of Prior FSS Participants

The following previous FSS families will be allowed to re-enroll in LCHA's FSS Program:

- FSS participants who have withdrawn voluntarily
- Families terminated with escrow disbursement, must wait one year after exit
- Families involuntarily terminated- must wait one year after exit
- Family members who were not Heads of FSS family previously

The following conditions apply to re-enrollment:

In addition to the criteria above, families may only re-enroll one time during residency and must demonstrate a positive change in employment status at the time of re-enrollment.

F. Head of FSS Family

The Head of the FSS family is designated by the participating family. The LCHA will make itself available to consult with families on this decision but it is the assisted household that chooses the head of the FSS family that is most suitable for their individual household circumstances. The designation of any changes by the household to the head of the FSS family must be submitted to the LCHA in writing and certified by the Head of Household and, if applicable, the Head of the FSS family.

V. Outreach

The LCHA will conduct widespread outreach to encourage enrollment in the FSS Program. Outreach efforts will include the activities identified through the following methods:

- Posting information about FSS on the LCHA website
- Posting FSS flyers in locations likely to be seen by eligible families
- Providing information about the FSS program during scheduled reexaminations
- Providing information about the FSS program at HCV and PH orientation sessions
- Providing information about FSS to eligible families by mail

Interpreters will be used as needed and clients may contact office staff in person, by phone, or via email to express their interest in participation.

Outreach information material about the FSS Program will include information about:

- Program overview
- Program benefits
- Available resources
- Participant responsibilities
- Program outcomes

Outreach efforts will be targeted equally for 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 LCHA will account for the needs of persons with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible clients who wish to participate are able to do so.

VI. FSS Escrow Account and Other Incentives for Participants

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account, as well as any additional incentives offered by the LCHA, are described below:

I. Additional Incentives

While the LCHA's FSS Program does not provide any other financial incentives for FSS participants, it does provide coaching services, as well as referrals to other service providers, that can be very valuable for FSS program participants.

II. Interim Disbursements

The LCHA will allow for interim disbursements subject to certain specified limitations: Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP). Requests may be made verbally or in writing. Requests may be made through the term of the Contract of Participation. Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment. Certain guidelines/limitations apply to interim disbursements requests, as noted in the table below. The FSS Coordinator and an administrative staff representative of the LCHA will consider requests for interim disbursement in light of these policies and applicable federal requirements.

- Debt Repayment
 - Interim disbursements will be allowed for repayment of debt incurred prior to enrollment in FSS, but not for debt incurred afterwards
 - Head of FSS household must be engaged in financial coaching and this request must have the support of the financial coach
 - Requests will be considered on a case-by-case basis
 - An interim disbursement for debt repayment may not exceed 50% of the participant's escrow savings

- Car Purchase
 - The maximum interim disbursement that will be allowed for car purchase is 50% of the participant's escrow savings
 - Head of FSS household must be engaged in financial coaching and this request must have the support of their financial coach
 - Head of FSS household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle
 - Requests will be considered on a case-by-case basis

- Post-Secondary Education
 - The maximum interim disbursement that will be allowed for education expenses is 50% of the participant’s escrow savings
 - Requests will be considered on a case-by-case basis

III. Uses of Forfeited Escrow Funds

The LCHA may also initiate a request for the use of forfeited escrow funds. At the discretion of the FSS Coordinator, forfeited escrow funds may be used in lieu of an interim disbursement. Forfeited escrow funds may be deployed any time during the term of a household’s CoP. Use of forfeited escrow funds for eligible uses may be requested by the LCHA or the Head of the FSS family. Eligible uses of forfeited escrow funds include, but are not limited to:

- Purchasing a vehicle
 - The maximum forfeited escrow fund amount that will be allowed for a vehicle purchase is \$1500
 - Head of FSS household must be engaged in financial coaching and this request must have the support of their financial coach
 - Head of FSS household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle
 - Requests will be considered on a case-by-case basis
- Child Care
 - Head of FSS household must be employed or enrolled in post-secondary education
 - Maximum term of assistance will not exceed two weeks
 - Requests will be considered on a case-by-case basis
- Training for participants
 - Requests will be considered on a case-by-case basis
- Employment or Educational costs including: Employment training and/or preparation, Education costs to include books, fees, uniforms, tools, etc
 - Requests will be considered on a case-by-case basis
- Training for FSS Program staff
 - Requests for funding must be approved by the LCHA Executive Director

VII. Family Activities and Supportive Services

As described in the next section, all families participating in the FSS Program will benefit from coaching that helps them identify and achieve goals that the family selects. Drawing on partners from the Program Coordinating Committee (PCC) and relationships with other service providers, the coaches will provide referrals as need to help FSS participants access appropriate services to help them achieve their goals:

Supportive Service Category	Specific Service	Source/ Partner
Assessment	Vocational Assessment Educational Assessment Career Assessment	Vocational Rehabilitation FMTC LCHA
Child Care	Infant/Toddler Care Preschool Care Afterschool Care Homework Assistance	CCSWFL VPK Lee County School District LCHA- Community Center
Transportation	Bus Passes	LeeTran
Education	High School Equivalency/ GED ESOL Post-secondary Certificates Advanced Degrees	Lee County School District FMTC FGCU/ FLSW State
Skills Training	Training in Executive Function Basic Skills Training Emerging Technologies Biomedical Training On-the-job Training Skilled Labor Training	LCHA Career Source FMTC
Job Search Assistance	Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement	LCHA Career Source Dress for Success SWFL
Micro and Small Business Development	Small Business Development Series Small Business Mentoring Entrepreneurship Training	FL Small Business Dev. Ctr Goodwill Microenterprise
Health/ Mental Health Care	Alcohol and Drug Abuse Prevention and Treatment Primary Care Dental Services Mental Health Services Health Insurance Advising	SalusCare Healthcare Network of SWFL DCF
Crisis Services	Crisis Assessment Crisis Intervention Crisis Management Crisis Resolution	Dept of Health Services SalusCare ACT VA

Child/ Adult Protective Services	Needs Assessment Case Planning Information Referral	DCF CPS
Household Management	Training in Household Management	LCHA Dept of Human Services
Homeownership Preparation	Homeownership Education Homeownership Counseling Down Payment Assistance Other Homeownership Assistance	Affordable Homeownership Foundation Lee County Housing Dev. Dept of Human Services
Financial Empowerment	Financial Education Financial Coaching Banking Services Training in Money Mgmt	LCHA Wells Fargo Suncoast CU CFPB
Legal Services	Legal Services	Florida Rural Legal Services Legal Aide
Debt Resolution and Credit Repair	Assistance negotiating the resolution of past due debt Credit Counseling	LCHA Wells Fargo Suncoast CU

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

- A. 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 the Contract of Participation. After enrollment in the FSS Program, the FSS Coordinator may make referrals to partner agencies for completion of one or more formal needs assessments. These assessments may focus on such issues as: employment readiness and employment training needs, educational needs related to secondary and post-secondary education, financial health, and other topics, depending on the needs and interests of the family.

The formal assessments may lead to adjustments to the ITSP, if requested by the family.

B. Delivering Appropriate Support Services

All families who participate in the FSS Program will be assigned an FSS Coordinator who will provide coaching services to help each participating family to:

- Understand the benefits of participating in the FSS Program and how the program can help the family achieve its goals.
- Identify achievable, but challenging interim and final goals for participation in the FSS Program, break down the goals into achievable steps and accompany the family through the process.
- Identify existing family strengths and skills.
- Understand the needs that the family has for services and supports that may help the family make progress toward their goals.

- Access services available in the community through referral to appropriate service providers.
- Overcome obstacles in the way of achieving a family's goals.

C. Transitional Supportive Service Assistance

Families that have completed their CoP and remain in assisted housing may request assistance with referrals to service providers in order to continue their progress toward economic security. Subject to limitations on staff capacity, LCHA will try to help these families with appropriate referrals. The time spent on these referrals will not be covered by funds designated by HUD to support the FSS Program.

IX. Contract of Participation

A. Form and Content of Contract

The CoP, which will incorporate one ITSP for each participating member of the family, sets forth the principal terms and conditions governing participation in the FSS Program. These include the rights and responsibilities of the FSS family and of the LCHA, the services to be provided to, and the activities to be completed by, each adult member of the FSS family who elects to participate in the program.

B. ITSP Goals

Each individual's ITSP will establish specific interim and final goals by which the LCHA 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 LCHA will establish as a final goal that every member of the family become independent from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS Coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

C. Determination of Suitable Employment

As defined in the FSS regulations 24CFR 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 LCHA, 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 follow the execution date. Families may request up to two one-year extension(s) and are required to submit a written request that documents the need for the extension. LCHA 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 LCHA, 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 LCHA

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 of 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 LCHA will accept the following form of verification for completion of the ITSP goals:

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

F. Modification

The LCHA 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 LCHA as well as the Head of FSS family.

The LCHA 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 LCHA, 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

The LCHA will not allow modifications if the CoP is within 180 days from the end of the term.

G. Consequences of Non-compliance with the Contract

Participant non-compliance with the CoP may result in termination from the FSS Program. See policies on Involuntary Termination I Section X(A).

X. Program Termination, Withholding of Services, and Available Grievance Procedures

Program Termination

A. Involuntary Termination

The LCHA may involuntarily terminate a family from FSS under the following circumstances:

1. If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan and related documentation. Non-compliance includes:
 - i. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
 - ii. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities
 - iii. Failure to complete activities and/or goals within the specified time frames; and/or
2. If the participant's housing assistance has been terminated.

Participants who fail to meet their obligations under paragraph 1 above, as determined by an FSS Coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned LCHA 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 meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue(s), may lead to termination from the program. The FSS Coordinator will also attempt to contact the participant via phone, text, in person and/or email prior to the review meeting. Participants who remain out of compliance after this meeting will be subject to termination from the FSS Program.

If the initial meeting does not resolve the problem, or if the meeting is not requested by the family within the required period, notification of termination will be made to the family by letter stating:

1. The specific facts and reasons for termination;

2. A statement informing the family of their right to request an informal hearing and the date by which this request must be received (see Grievance Procedures);
3. A statement informing the family that termination from the FSS Program for the reasons stated therein will not result in termination of the family's housing assistance. Failure to request a hearing in writing by the deadline will result in closure of the family's FSS file and all rights to a hearing will be waived. All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. Housing assistance will not be terminated based on non-compliance with the FSS Program. The current amount of escrow in the family's escrow account will be included in the letter.

B. Voluntary Termination

Participants may also be terminated from the FSS Program under the following circumstances:

- Mutual consent of both parties; and/or
- The family's withdrawal from the program.

C. Termination with Escrow Disbursement

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

- i. Services that the LCHA 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 LCHA 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 LCHA FSS Coordinator within fourteen (14) business days 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
- LCHA 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 a 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. Requests to reschedule a hearing must be made in writing within (5) days prior to the hearing date.

If the family does not appear at the scheduled time and was unable to reschedule the hearing in advance due to the nature of the emergency, the family must contact the LCHA within 24 hours of the scheduled hearing date, excluding weekends and holidays and provide verification of the emergency. LCHA will then reschedule the hearing. The decision made by the Hearing Officer will be final. The LCHA reserves the right to overturn the Hearing Officer's decision only in the event that the decision is contrary to the organization's written policies.

XI. Assurance of Non-Interference

Participation in the FSS Program is voluntary. A family's decision on whether to participate in FSS will have no bearing on the LCHA's decision of whether to admit the family into the Public Housing or any HCV Programs. 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.

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

XII. Timetable

LCHA implemented its FSS Program in 2002 and will continue to implement it per this FSS Action Plan.

XIII. Reasonable Accommodations, Effective Communication, and Limited English Proficiency

Requests for Reasonable Accommodations:

A person with disabilities may request reasonable accommodations to facilitate participation in the FSS Program. Requests will be considered on a case-by-case basis.

Requests should be made initially to the FSS Coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's reasonable accommodations policy. The policy is available online at www.leecountyhousing.org.

Request for Effective Communication:

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, etc.), or assistance in reading or completing a form, etc.

Requests should be made initially to the FSS Coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's effective communications policy. The policy is available online at www.leecountyhousing.org.

Limited English Proficiency:

The LCHA 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, the limited English proficiency policy available online at www.leecountyhousing.org.

XIV. Coordination of Services

A. Certification of Coordination

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

B. Program Coordinating Committee

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

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

1. FSS Program Coordinator
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:
 - CareerSource
 - Lee County Dept of Human Services
 - Affordable Homeownership Foundation
 - Lee County Dept of Transportation
 - Lee County Health Department
 - Lee County School District
 - Florida Dept of Children and Families
 - Goodwill of SWFL

XV. FSS Portability (Applicable to HCV Only)

A. Portability in Initial 12 Months

While LCHA is not required to allow FSS participants to exercise portability within the initial 12 months after signing a CoP, it is the policy of LCHA to allow for portability within this period to the extent feasible.

B. Moves into the PHA's Jurisdiction

If an FSS participant moves into the PHA's jurisdiction, they will be admitted in good standing into the LCHA's FSS Program unless the LCHA is already servicing the numbers of FSS families identified in this FSS Action Plan and determines that it does not have the resources to manage the FSS contract.

Regardless of whether LCHA is able to receive an incoming family from another jurisdiction into the FSS Program, LCHA will agree to allow and support porting families to remain in their initial PHA's FSS Program after porting housing vouchers if the initial PHA requests that the family remain in the initial FSS program and can demonstrate the family is able to fulfill its responsibilities under the initial CoP, the move in jurisdictions notwithstanding.

C. FSS Termination with Disbursement for Porting Families

If an FSS family seeks to move to a jurisdiction that does not offer an FSS Program, the LCHA will closely examine the family's progress to determine if it would be appropriate to exercise FSS Termination with Disbursement as discussed above in the section on Termination.

Where continued FSS participation is not possible, LCHA will discuss the options that may be available to the family, depending on the family's specific circumstances, which

may include, but are not limited to, modification of the FSS Contract, termination of the FSS Contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS Program.

XVI. Other Policies

Policy	Where Addressed in Plan
Policies related to the modification of goals in the ITSP	Section IX: Contract of Participation
The circumstances in which an extension of the Contract of Participation may be granted	Section IX: Contract of Participation
Policies on the interim disbursement of escrow, including limitations on the use of the funds	Section VI: FSS Escrow Account and Other Incentives for Participants
Policies regarding eligible uses of forfeited escrow funds by families in good standing	Section VI: FSS Escrow Account and Other Incentives for Participants
Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating	Section IV: Family Selection Procedures
Policies on requirements for documentation of goal completion	Section IX: Contract of Participation
Policies on documentation of the household's designation of the "Head of FSS Household"	Section IV: Family Selection Procedures
Policies for providing an FSS selection preference for porting families	Section IV: Family Selection Procedures

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 **LCHA**, as may be required under this part, and which:

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

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 **LCHA** 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 **LCHA**; 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.

FY means Federal Fiscal Year (starting October 1 and ending September 30, and year designated by the calendar year in which it ends).

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

Individual Training and Services Plan (ITSP) means a written plan that is prepared by the **LCHA** 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 **LCHA** and the participating FSS family member, and is attached to, and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS Program, including the head of FSS family who has signed the CoP.

Owner means the owner of multifamily assisted housing.

Self-sufficiency means that an FSS family is no longer receiving Section 8, Public Housing assistance, or any Federal, State, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS escrow account funds.

Supportive services mean those appropriate services that a **LCHA** 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.