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Chapter 19

FAMILY SELF SUFFICIENCY ACTION PLAN

[24 CFR 984 Subpart B and HUD Guidebook Administering an Effective Family Self-Sufficiency Program]

INTRODUCTION

This chapter describes PHA policies related to the HCV Family Self Sufficiency (FSS) Program in sixteen parts:

Part I: Overview

Part II: Family Demographics and Estimate of Participating Families

Part III: FSS Family Selection Procedures

Part IV: Incentives to Encourage Participation

Part V: Outreach Efforts

Part VI: FSS Activities and Support Services

Part VII: Method for Identification of Family Support Needs

Part VIII: Program Termination; Withholding of Services; and Available Grievance Procedures

Part IX: Assurances of Non-Interference with Rights of Non-Participating Families

Part X: Timetable for Program Implementation

Part XI: Certification of Coordination

Part XII: Contract of Participation

Part XIII: Escrow Accounts

Part XIV: Individual Training and Services Plans

Part XV: Informal Hearings

PART I: OVERVIEW

The Family Self Sufficiency (FSS) Program is a critical component of HUD's overall efforts to help Housing Choice Voucher holders and residents of public housing and HUD-assisted multifamily housing to make progress toward economic security. FSS helps participants increase their earnings and build financial capability and assets through two key features which build on the platform of stable housing created by rental assistance:

- A **financial incentive** for participants to increase their earnings in the form of an escrow savings account that increases as residents' earnings increase. The escrow account helps participants build savings that they can use to improve their quality of life and advance their personal goals. Escrow funds can also help participants cover the cost of services
- that may be needed to make progress toward goals while enrolled in the program, such as employment training or car repair.
- **Case management or coaching** to help residents access services they may need to overcome barriers to employment, strengthen their financial capability and address other challenges holding them back from achieving their goals.

MDOC has operated a Family Self Sufficiency Program in the Montana since 1992 for the Housing Choice Voucher Program. MDOC contracts with 11 field agencies to carry out on behalf of MDOC administrative functions associated with the FSS Program.

MDOC Policy

MDOC will administer the FSS Program in accordance with HUD's regulations at 24 CFR 984 and the guidance provided in HUD's "Administering an Effective Family Self-Sufficiency Program" Guidebook.

In addition, Field Agency staff that will be providing case management and coaching are required to take HUD's online *Family Self Sufficiency Training*, which is located at HUD Exchange.

PART II: FAMILY DEMOGRAPHICS AND ESTIMATE OF PARTICIPATING FAMILIES

Since FSS is a statewide program, the demographics of families to be participating in the FSS program are extremely varied. The demographics of program participants will follow those of the general overall state population, as well as the local county low-income population of each field agency service area.

MDOC Policy

MDOC's FSS Program is a voluntary program. The size of the program is of minimal size. FSS slots are allocated to each of the 11 field agencies MDOC contracts with based on the agency's ability to administer the FSS Program as well as provide case management. The number of allocated slots are reviewed annually and identified as part of the contractual agreement between the agencies and MDOC. Currently, MDOC has allocated 110 FSS slots that have been allocated out to the 11 field agencies.

PART III: SELECTION OF FSS FAMILIES

MDOC Policy

Families will be selected for participation by the MDOC field agents in the following priority order, based on local needs and services to be provided:

Participating families from the voucher program who are enrolled in local JOBS, JTPA, Employed Parent, Displaced Homemaker, or similar programs in which the MDOC field agent is actively involved, for a maximum of 50% of the allocated program slots, then other MDOC Section 8 program participant families showing interest in FSS from the field agent service area on a first-come, first-served basis. The following are not eligible to participate in the MDOC FSS program:

- Families who were prior FSS program participants and were terminated from the FSS program for non-compliance with the FSS contract of participation;
- Families who were prior FSS program participants and were terminated from the Section 8 rental assistance program for non-compliance with the Section 8 program rules and policies or for violating any family obligations under the program;
- Families who were prior FSS program participants that withdrew from the FSS Program;
- Families who were prior FSS program participants that graduated from the FSS Program;
- Families who owe any PHA money in connection with Section 8 or public housing assistance.

PART IV: INCENTIVES TO ENCOURAGE PARTICIPATION

MDOC Policy

MDOC offers the following incentives to encourage participation in the FSS program.

Information on education, employment and training, and home ownership programs.

Referral to support services like child-care, transportation and work/education related costs while enrolled in this program.

An escrow account (like a savings account) for the duration of the program. The FSS escrow account funds are available when self-sufficiency is achieved.

PART V: OUTREACH EFFORTS

MDOC Policy

Each MDOC field agency will schedule periodic public FSS orientation meetings for prospective participants and service providers. The purpose of the meetings will be to explain the FSS program and how it operates, responsibilities of the participants, and provide other information concerning the FSS program, as well as to collect the names of participating Section 8 families interested in participating in the FSS program.

MDOC field agents will mail meeting invitations to voucher participants from their jurisdictional service area.

A list will be maintained at each field agent location naming voucher participant families interested in becoming FSS participants. Those not responding to the meeting invitation will be considered to have been contacted and are not interested in the FSS program.

As participating Section 8 families enter local JOBS, Unemployed Parent, Displaced Homemaker, or similar programs in which the MDOC field agency is actively involved, they will be advised about the FSS program, and the field agent will add them to the list, if the family is interested.

The MDOC Family Self-Sufficiency information sheet will be presented to all minority and non-minority participants by local field agents at all reexaminations (if vacancies exist and services are available) to further encourage participation in the FSS program.

PART VI: ACTIVITIES AND SUPPORT SERVICES

MDOC Policy

Complete lists of anticipated services and service providers were included in the 1992 MDOC FSS application. Actual services provided may not be similar to the initial needs in 1992, depending on local conditions and participant needs at the time the FSS Contract of Participation is signed.

The contracted field agencies administering the FSS program are required to at least annually review the participant's training and services plan and update the plan as necessary. This information will also be updated electronically in each participant's file in the applicable software. This process eliminates the necessity of the agency providing a written annual report to MDOC listing the anticipated services needed by the participant family.

PART VII: METHOD FOR IDENTIFICATION OF FAMILY SUPPORTED SERVICES

MDOC Policy

Needs for services vary by locality and participant. Supportive services provided throughout the state may differ at individual locations. Since individual needs of participating FSS families are of primary importance to success of the families (and the program), the field agency will assist the family in developing training and services plans that take into account the availability of the service in the locality. However, the field agency will also encourage the participant to search out alternatives for training and education from the internet.

PART VIII: PROGRAM TERMINATION; WITHHOLDING OF SERVICES; AND AVAILABLE GRIEVANCE PROCEDURES

MDOC Policy

The termination of families participating in the FSS program will be governed by the provisions of the MDOC Administrative Plan and the FSS Contract of Participation. A family enrolled in the FSS program may be terminated from the FSS Contract of Participation if they fail to satisfactorily perform the requirements under their individual FSS contract. The individual must report to the local FSS coordinator at least quarterly to update activities, progress on goals and individual training plan. If the participant has not contacted the coordinator for two consecutive quarters, MDOC in coordination with the local FSS coordinator, will notify the participant in writing of their termination from the FSS program.

MDOC will consider reasons for the family not being able to fulfill their obligations under the FSS contract, prior to determining whether to terminate the FSS contract.

Additionally, a family participating in the FSS program that has failed to report income will be offered, on a one-time basis only, a repayment agreement in accordance with the provisions of HUD PIH Notice 2018-18. If the family refuses to enter into the agreement to repay MDOC, the family will be terminated from the FSS Program. If the family defaults on the repayment agreement, the family will be terminated from the FSS Program. If the family fails to report income a second time, the family will be terminated from the FSS Program and may be terminated from the housing assistance program.

A family terminated from participation in the FSS program may request an informal hearing within 20 days of being notified by MDOC of their termination. If the family voluntarily terminates their participation in the FSS program, they may not request a hearing for termination of the Contract of Participation, or for the right to access any funds in their escrow account.

PART IX: ASSURANCES OF NON-INTERFERENCE WITH RIGHTS OF NON-PARTICIPATING FAMILIES

MDOC Policy

A family's election to not participate in the MDOC FSS program will not affect the family's admission to the Section 8 housing programs or the family's right to occupancy in accordance with its lease.

PART X: TIMETABLE FOR PROGRAM IMPLEMENTATION

MDOC Policy

MDOC's FSS Program was implemented in 1992 and has been in operation since that time. The MDOC program is voluntary.

PART XI: CERTIFICATION OF COORDINATION

MDOC Policy

The MDOC certifies that development of the services and activities under the FSS program has been coordinated with the JOBS Program, the programs provided under the JTPA, and any other relevant employment, child care, transportation, training, and education programs (e.g. Job Training for the Homeless Demonstration Program) by the MDOC contracted field agency in the applicable area, and that implementation will continue to be coordinated, in order to avoid duplication of services and activities.

PART XII: CONTRACT OF PARTICIPATION

MDOC Policy

The FSS Contract of Participation is a five-year contract between the FSS participant family and MDOC. The contract has the option of a two-year extension. The effective date of the contract must be the first day of the month following the date MDOC signs the contract. All corrections made to the contract should be initialed by all of the parties concerned with a copy available in the participant's file at all times.

PART XIII: FSS ESCROW ACCOUNT

MDOC Policy

MDOC may, at its sole option, make an interim disbursement of a portion of the funds from the family's escrow account during the contract period for contract-related expenses if the family has successfully progressed in meeting interim contract goals, and needs a portion of the FSS account funds for purposes consistent with the contract, such as:

- **School tuition or other school costs,**
- **Job training expenses,**
- **Business start-up expenses,**
- **A car, when public transportation is unavailable or inaccessible to the family, or for major car repairs, the later which will be determined on a case by case basis, and**
- **Emergency medical expenses.**

PART XIV: INDIVIDUAL TRAINING AND SERVICE PLANS

MDOC Policy

All individual training and services plans must be reviewed and updated at least annually for the head of the FSS family, and each adult member of the FSS family who elects to participate in the FSS program. The plans must include both interim and final goals. All goals (both interim and final) must include specific activities under each goal, timeframes, and the party responsible for each goal identified, to provide a clear understanding of the participant's goals and objectives. Plans must be written with enough detail to allow evaluation of performance by MDOC. All plans must include the mandatory interim and final goals which are:

Interim Goal

All household members must be independent of welfare cash assistance from federal or state welfare programs for at least the last 12 months of their participation in the program. The requirement applies solely to ongoing cash assistance. Food stamps, Medicaid, or short-term non-recurring cash payments (such as a one-time payment of emergency assistance to help a family avoid eviction or meet a medical expense) are not included.

Final Goal

The Head of Household must seek and maintain suitable employment.

PART XV: INFORMAL HEARINGS

MDOC Policy

Informal Hearings will be conducted in accordance with Chapter 16 of the MDOC Admin Plan.