



SANTA MONICA HOUSING AUTHORITY
FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN



Approved by the Housing Division Manager and Submitted to HUD on 11.17.2022

FSS Program Action Plan

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Chapter 18

THE FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN

INTRODUCTION

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by Santa Monica Housing Authority. It was submitted to HUD on **11/17/2022**.

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 Santa Monica 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.

The FSS program and the functions and responsibilities of PHA staff are consistent with Santa Monica Housing Authority's Personnel Policy and Agency Plan.

PROGRAM SIZE AND CHARACTERISTICS

FAMILY DEMOGRAPHICS

These tables describe the demographics of the population expected to be served by the Santa Monica Housing Authority's Action Plan.

The FSS program serves the following housing assistance program participants:

- Public Housing,
- Housing Choice Vouchers (HCV): Tenant-Based Vouchers
Housing Choice Vouchers (HCV): Project-Based Vouchers (PBV)
- Housing Choice Vouchers (HCV): HCV Homeownership
- Housing Choice Vouchers (HCV): Other special purpose vouchers (*e.g. FUP, FUP-Y, FYI, VASH, EHV, etc.*) (Specify: _____)
- Section 8 Moderate Rehabilitation
- Project-Based Rental Assistance (PBRA)

As part of the required contents of the FSS action plan, family demographics of the housing choice voucher program participants serve to provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants). These data may later be used to help the housing authority and the program coordinating committee (PCC) to identify the supportive service needs of the families expected to participate in the FSS program.

The HCV Program is comprised of approximately 67% female heads of households (HOH) and 33% male HOHs.

The racial and ethnic makeup of the FSS program will reflect that of the PHA's HCV program population with 83.3% identifying as Hispanic or Latino, 75.2% White, 20.6% African American, 0.4% Asian/Pacific Islander, 1.0% Native American, and 2.8% mixed ethnicity or unknown.

The average size of each household is 1.46 persons, with 84.5% of families having dependents, 9.5% homeless at admission, 65.2% elderly, and 60.2% disabled.

69.3% of families have an Adjusted Monthly Income at or above \$1,000, 24.1% between \$500-\$1,000, 3.9% between \$200-\$500, 1.7% less than \$200, and 0.9% at zero income.

SUPPORTIVE SERVICES NEEDS

Families expected to enroll in the Santa Monica Housing Authority FSS program have service needs including, but not limited to:

- 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
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for childcare
- Transportation assistance
- 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

PROGRAM OBJECTIVES [24 CFR 984.102]

The federal objectives for the FSS program are specified in 24 CFR 984.102.

Santa Monica Housing Authority'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 personal and financial goals

Minimum Program Size. In accordance with CFR §984.105, Santa Monica Housing Authority has a remaining FSS program mandate to serve **0** families. This is calculated based on the table below. This is our best estimate at this time, and it includes the mandate the HCV program.

Original Number of Participants Mandated in HCV	FSS Graduates	Remaining Mandatory Slots
<u>235</u>	<u>235</u>	<u>0</u>

Therefore, as of the time of preparation of this Action Plan, Santa Monica Housing Authority expects to be able to serve *the remaining* families in the FSS program at this time.

ESTIMATE OF PARTICIPATING FAMILIES

Santa Monica Housing Authority has met and exceeded its statutory requirements to enroll FSS participants and is in the process of sunseting its FSS program. The Housing Authority will not accept further admissions to FSS.

OTHER SELF-SUFFICIENCY PROGRAMS

Option 2:

No families from other self-sufficiency programs are expected to enroll in the FSS program.

SELECTION PROCEDURES

WAITLIST

A waiting list was established for families whose applications could not be accepted at the time of initial application due to program capacity limits. The waiting list included the name and contact information for the head of household of the applicant family and the date of their application.

PREFERENCES

Option 1: No preference:

The FSS program has not adopted any admissions preferences. Families were selected based on the following selection method:

<u>Selection Method</u>	
Lottery	<input type="checkbox"/>
Length of time living in subsidized housing	<input type="checkbox"/>
Date the family expressed an interest in participating in the FSS program	<input checked="" type="checkbox"/>

SCREENING FOR MOTIVATION

Option 1: Santa Monica Housing Authority does not use any motivational screening factors to measure a family's interest and motivation to participate in the FSS program.

COMPLIANCE WITH NONDISCRIMINATION POLICIES

Santa Monica Housing Authority complies 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, Santa Monica 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).

FSS Service Provider 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, SMHA staff will review the file during 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, Santa Monica Housing Authority will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

RE-ENROLLMENT OF PRIOR FSS PARTICIPANTS

The following previous FSS families will be allowed to re-enroll in Santa Monica Housing Authority's FSS program:

- FSS program graduates
- FSS participants who have withdrawn voluntarily
- Families terminated with escrow disbursement
- Families involuntarily terminated
- Family members who were not Heads of FSS Family previously
- No member of previously enrolled families may re-enroll

The following conditions apply to re-enrollment:

The SMHA currently accepts FSS applications.

HEAD OF FSS FAMILY

The head of the FSS family is designated by the participating family. Santa Monica Housing Authority may make itself available to consult with families on this decision, but the assisted household 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 Santa Monica Housing Authority in:

- Writing

OUTREACH EFFORTS

Santa Monica Housing Authority conducts widespread outreach to encourage enrollment in the FSS program. Outreach efforts 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 our toll-free telephone number, or by email.

The following conditions apply to enrollment outreach:

The SMHA currently accepts FSS applications.

PHA Policy

Outreach Methods	Details
<input checked="" type="checkbox"/> Posting FSS program flyers in locations likely to be seen by eligible families	In voucher briefing folders, the office lobby, and on the program application
<input checked="" type="checkbox"/> Providing information about the FSS program during scheduled reexaminations	At briefing and annual re-examination
<input type="checkbox"/> Providing information about the FSS program at voucher orientation sessions	
<input type="checkbox"/> Holding well-publicized information sessions about FSS	
<input type="checkbox"/> Providing information about the FSS program to eligible families by mail	
<input type="checkbox"/> Facebook	
<input type="checkbox"/> Twitter	
<input type="checkbox"/> Instagram	

Outreach informational material about the FSS Program includes information about:

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

Outreach efforts are targeted equally to all families, using materials in both English and Spanish 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, Santa Monica Housing Authority accounts for the needs of persons with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible families who wish to participate are able to do so.

ASSURANCE OF NONINTERFERENCE

Participation in the FSS Program is voluntary. A family's decision on whether to participate in FSS will have no bearing on Santa Monica Housing Authority's decision of whether to admit the family into the Section 8/ Housing Choice Voucher program. The family's housing assistance will not be terminated based on whether they decide to participate in FSS, their successful completion of the Certificate of Completion, or on their failure to comply with FSS program requirements.

Santa Monica Housing Authority will clearly state the voluntary nature of FSS program participation in all FSS outreach and recruitment efforts.

ACTIVITIES AND SUPPORT SERVICES

As described in the next section, all families participating in the FSS program benefit from coaching that helps them identify and achieve goals that the family selects. Drawing on Program Coordinating Committee members and partner agencies, service provider staff at St. Joseph Center provide referrals as needed to help FSS participants achieve their goals:

Supportive Service Category	Specific Service	Source/Partner
<input checked="" type="checkbox"/> Assessment	<input checked="" type="checkbox"/> Vocational Assessment Educational <input checked="" type="checkbox"/> Assessment Disability Assessment <input checked="" type="checkbox"/> Disability Other specialized assessments	St. Joseph Center Step Up Disability Community Resource Center Chrysalis JVS Hospitality Training Academy
<input checked="" type="checkbox"/> Child Care	<input checked="" type="checkbox"/> Infant Care / Toddler Care Preschool Care <input checked="" type="checkbox"/> Afterschool Care <input checked="" type="checkbox"/> Homework Assistance	Early Childhood Lab School The Growing Place Family Services of Santa Monica CREST Virginia Avenue Park Santa Monica Police Activities League
<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discounted bus passes <input type="checkbox"/> Assistance with car repairs <input type="checkbox"/> Assistance with car purchase	Big Blue Bus LA Metro – LIFE program
<input checked="" type="checkbox"/> Education	<input checked="" type="checkbox"/> High School Equivalency/GED <input checked="" type="checkbox"/> English as a Second Language <input checked="" type="checkbox"/> Post-Secondary certificates <input checked="" type="checkbox"/> Advanced Degrees	Santa Monica-Malibu Unified School District Santa Monica City College UCLA
<input checked="" type="checkbox"/> Skills Training	<input type="checkbox"/> Training in Executive Function <input checked="" type="checkbox"/> Basic Skills Training <input checked="" type="checkbox"/> Emerging Technologies Training <input type="checkbox"/> Biomedical Training (including CNA, phlebotomy, x-ray and other tech, etc.) <input checked="" type="checkbox"/> On-the-Job Training <input checked="" type="checkbox"/> Apprenticeships <input type="checkbox"/> Skilled Labor training	St. Joseph Center Coding Program St. Joseph Center Culinary Arts Program Chrysalis JVS Hospitality Training Academy
<input checked="" type="checkbox"/> Job Search Assistance	<input checked="" type="checkbox"/> Resume Preparation <input checked="" type="checkbox"/> Interviewing Skills <input checked="" type="checkbox"/> Dress for Success <input checked="" type="checkbox"/> Workplace Skills <input checked="" type="checkbox"/> Job Development <input checked="" type="checkbox"/> Job Placement	Chrysalis JVS Hospitality Training Academy

<input checked="" type="checkbox"/> Micro and Small Business Development	<input checked="" type="checkbox"/> Small business development services <input checked="" type="checkbox"/> Small business Mentoring <input checked="" type="checkbox"/> Entrepreneurship Training	Small Business Development Center California, Los Angeles County Network Santa Monica College Entrepreneurship Program
<input checked="" type="checkbox"/> Health/Mental Health Care	<input checked="" type="checkbox"/> Alcohol and Drug Abuse Prevention <input checked="" type="checkbox"/> Alcohol and Drug Abuse Treatment <input checked="" type="checkbox"/> Primary care <input checked="" type="checkbox"/> Dental services <input checked="" type="checkbox"/> Mental Health Services <input type="checkbox"/> Health Insurance Advising	CLARE Matrix Venice Family Clinic Step Up On Second The People Concern
<input checked="" type="checkbox"/> Crisis Services	<input checked="" type="checkbox"/> Crisis Assessment <input checked="" type="checkbox"/> Crisis Intervention <input checked="" type="checkbox"/> Crisis Management <input checked="" type="checkbox"/> Crisis Resolution	Fire Department CRU LA County 988 Santa Monica Police and Fire services
<input checked="" type="checkbox"/> Child/Adult Protective Services	<input checked="" type="checkbox"/> Needs Assessment <input checked="" type="checkbox"/> Case Planning <input checked="" type="checkbox"/> Information Referral	WISE and Healthy Aging Westside Regional Center Santa Monica Police and Fire services
<input checked="" type="checkbox"/> Household Management	<input checked="" type="checkbox"/> Training in Household Management	St. Joseph Center
<input checked="" type="checkbox"/> Financial Empowerment	<input checked="" type="checkbox"/> Financial education <input checked="" type="checkbox"/> Financial coaching <input type="checkbox"/> Banking services <input checked="" type="checkbox"/> Training in money management	St. Joseph Center
<input type="checkbox"/> Individual Development Accounts	<input type="checkbox"/> Matched Savings Accounts	
<input checked="" type="checkbox"/> Legal Services	<input checked="" type="checkbox"/> Legal Services	Legal Aid Foundation of Los Angeles Bet Tzedek
<input type="checkbox"/> Debt Resolution & Credit Repair	<input type="checkbox"/> Assistance negotiating the resolution of past-due debt	

METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS

IDENTIFYING FAMILY SUPPORT NEEDS

To help determine the supportive services needs of each family, FSS Service Provider staff will complete an initial informal needs assessment with and for each family before completion of the initial Individual Training Service Plan (ITSP) and signing the Contract of Participation. After enrollment in the FSS program, FSS Service Provider staff 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 Individual Training Service Plan, if requested by the family.

DELIVERING APPROPRIATE SUPPORT SERVICES

Coaching. All families who participate in the FSS program will be assigned an FSS Service Provider offering individualized case management services to help each participating family:

- 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.
- Overcoming obstacles in the way of achieving a family's goals.

TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE

Option 1: Families that have completed their Certificate of Participation (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, Santa Monica 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.

CONTRACT OF PARTICIPATION

All families enrolled in the FSS program are 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 Santa Monica Housing Authority's policies and practices regarding the CoP.

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 Santa Monica 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.

ITSP GOALS

Each individual's ITSP establishes specific interim and final goals by which Santa Monica 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, Santa Monica Housing Authority 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 full-time employment (Full time is defined as at least 25 hours per week). FSS Service Provider staff 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.

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 Santa Monica 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.

CONTRACT OF PARTICIPATION TERMS 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. Santa Monica Housing Authority will grant the extension as required by HUD, provided good cause exists to do so. In this context, good cause means:

- (i) Circumstances beyond the control of the FSS family, as determined by Santa Monica 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 Santa Monica Housing Authority or
- (iii) Any other circumstances that Santa Monica Housing Authority determines warrants an extension, including force majeure.

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. Santa Monica Housing Authority accepts the following form of verification for completion of the ITSP goals:

- Option 2:** Santa Monica Housing Authority will require 3rd-party verification to document completion of ITSP goals.

MODIFICATION

Santa Monica 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 Santa Monica Housing Authority as well as the Head of FSS Family.

PHA Policy

Santa Monica Housing Authority allows 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 Santa Monica 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**

- Option 1:** Santa Monica Housing Authority allows modifications at any time during the term of the CoP

CONSEQUENCES OF NONCOMPLIANCE WITH THE CONTRACT

Participant non-compliance with the CoP may result in termination from the FSS program. See policies on Involuntary Termination in the following section.

PROGRAM TERMINATION, WITHHOLDING OF SERVICES, AND GRIEVANCE PROCEDURES

INVOLUNTARY TERMINATION

Santa Monica Housing Authority may involuntarily terminate a family from FSS under the following circumstances:

- 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:
- ii. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
- iii. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities
- iv. Failure to complete activities and/or goals within the specified time frames; and/or
- v. If the participant's housing assistance has been terminated.

Participants who fail to meet their obligations under paragraph I above, as determined by an FSS coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned Santa Monica 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.

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.

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.

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 Santa Monica 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 Santa Monica 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.

GRIEVANCE PROCEDURES

Santa Monica Housing Authority's PHA Plan details the Housing Authority's Grievance Procedures (See Santa Monica Housing Authority Admin Plan Chapter 16).

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 Santa Monica Housing Authority within 24 hours of the scheduled hearing date, excluding weekends and holidays. The Housing Authority will then reschedule the hearing. The Hearing Officer will issue a written decision to the family within ten (10) business days after the hearing. The decision made by the Hearing Officer will be final. Santa Monica Housing Authority 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.

ESCROW ACCOUNT AND OTHER INCENTIVES

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 Santa Monica Housing Authority, are described below.

ADDITIONAL INCENTIVES

Option 1. While Santa Monica Housing Authority’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.

INTERIM ESCROW DISBURSEMENTS

Option 1: Santa Monica 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 must generally be made 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 FSS Service Provider staff and an administrative staff representative of Santa Monica Housing Authority. FSS Service Provider staff will first explore options for services and in-kind donations from partners, which must be exhausted before a request for an interim disbursement will be approved.

USE 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 request from a family, FSS Service Provider staff and a member of the Program Coordination Committee (PCC) will consider the available funds and make a determination. Please refer to the subsequent “Coordination of Services” section for more information on the function and composition of the PCC for this FSS program.

Santa Monica Housing Authority may also initiate a request for the use of forfeited escrow funds.

Option 2A: At the discretion FSS Service Provider staff, forfeited escrow funds may be considered in lieu of an interim escrow disbursement.

Forfeited escrow accounts may be deployed:

Any time during the term of a household’s Contract of Participation

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

- Santa Monica Housing Authority
- Head of FSS Household
- Adults in FSS household, not limited to the Head

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

Eligible Uses	Guidelines/ Limitations
<input checked="" type="checkbox"/> Purchasing a vehicle	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis
<input checked="" type="checkbox"/> Childcare	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis
<input checked="" type="checkbox"/> Training for Participants	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis
<input checked="" type="checkbox"/> Employment or Educational Costs, Including: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Employment Training <input checked="" type="checkbox"/> Employment Preparation (employment clothing, interview prep) <input checked="" type="checkbox"/> Education Costs (books, fees, uniforms, tools, etc.) 	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis
<input checked="" type="checkbox"/> Training for FSS program staff	<input checked="" type="checkbox"/> Training must be approved by <i>[provider entity/ PCC]</i>

PORTABILITY

PORTABILITY IN INITIAL 12 MONTHS

Option 1: While Santa Monica 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 Santa Monica Housing Authority to allow for portability within this period to the extent feasible.

MOVES INTO THE PHA’S JURISDICTION

If an FSS participant moves into the PHA's jurisdiction, they will be admitted in good standing into Santa Monica Housing Authority's FSS program unless Santa Monica Housing Authority is already serving the number 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 Santa Monica Housing Authority is able to receive an incoming family from another jurisdiction into the FSS program, Santa Monica Housing Authority 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.

FSS TERMINATION WITH DISBURSEMENT FOR PORTING FAMILIES

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, Santa Monica Housing Authority 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, Santa Monica Housing Authority 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.

TIMETABLE

PHA Policy

Option 1: Santa Monica Housing Authority will continue to implement the FSS Program per this FSS Action Plan.

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 Service Provider staff. After a request for an accommodation is presented, the PHA will respond in writing, acknowledging receipt of the request, within a reasonable time not to exceed 10 business days. Based on the verified need for the accommodation, or the absence thereof, the PHA will render its decision within a reasonable period of time. If a family is not satisfied with the staff's response, the family may submit a request in writing in accordance with the provider's reasonable accommodations policy.

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 aides 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 FSS Service Provider staff. If a family is not satisfied with the staff's response, the family may submit a request in writing in accordance with the service provider's effective communications policy.

Limited English Proficiency

Santa Monica 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.

COORDINATION OF SERVICES

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.

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

1. One or more FSS Service provider staff and/or Santa Monica Housing Authority staff
2. One or more Santa Monica Housing Authority Housing Choice Voucher participants
3. Representatives from a variety of agencies and individuals, which include but are not limited to the following:
 - a St. Joseph Center
 - b Step Up on Second
 - c Legal Aid Foundation of Los Angeles
 - d Community Corporation of Santa Monica
 - e Chrysalis
 - f JVS
 - g Hospitality Training Academy
 - h Salvation Army

OTHER POLICIES

Policy	Corresponding Action Plan Section
(i) Policies related to the modification of goals in the ITSP	Contract of Participation
(ii) The circumstances in which an extension of the Contract of Participation may be granted	Contract of Participation
(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any)	FSS Escrow Account and Other Incentives for Participants
(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing	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	Family Selection Procedures
(vi) Policies on requirements for documentation for goal completion;	Contract of Participation
(vii) Policies on documentation of the household's designation of the "Head of FSS Household";	Family Selection Procedures
(viii) Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference)	N/A

DEFINITIONS

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

- (1) Shall be maintained by Santa Monica 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, Santa Monica Housing Authority, and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or Santa Monica 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 Santa Monica 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 Santa Monica 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 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 Santa Monica 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 Santa Monica 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 Santa Monica Housing Authority, and is in compliance with the regulations regarding participation in the relevant rental assistance program.

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 FSS Service Provider staff 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 Santa Monica 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.

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 Service Provider staff 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 utility 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.