

HOUSING AUTHORITY OF THE
CITY AND COUNTY OF SAN FRANCISCO

FAMILY SELF-SUFFICIENCY PROGRAM

ACTION PLAN



Revised October 31, 2022



HOUSING AUTHORITY OF THE
CITY AND COUNTY OF SAN FRANCISCO
1815 Egbert Avenue, San Francisco, CA 94124

I. Introduction

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by the Housing Authority of the City and County of San Francisco (Authority). It was submitted to HUD on November 1, 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 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 the Authority's personnel policy and Agency Plan.

II. Program Objectives

The Authority's FSS program seeks to help families make progress toward economic security by supporting the family's efforts to:

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

On the local level, the Authority will achieve the national program objective of reducing the dependence of low-income families on welfare assistance and on Housing Choice Voucher (HCV) Program, public, or any federal, state, or local rent or homeownership subsidies by establishing and maintaining partnerships to offer low-income families a broad range of services, including education, job training, counseling, and other forms of social service assistance so that families may achieve economic self-sufficiency, as defined in Section XVII of this document.

III. Program Size and Characteristics

Family Demographics

The FSS program will serve the following housing assistance programs:

- Housing Choice Vouchers (HCV): Tenant-Based Vouchers
- Housing Choice Vouchers (HCV): Project-Based Vouchers
- Housing Choice Vouchers (HCV): HCV Homeownership
- Housing Choice Vouchers (HCV): Rental Assistance Demonstration (RAD)
- Housing Choice Vouchers (HCV): Other Special Purpose Vouchers
 - Family Unification Program (FUP)
 - Foster Youth to Independence (FYI)
 - Veterans Affairs Supportive Housing (VASH)
 - Emergency Housing Vouchers (EHV)

The following tables describe the demographics of the population expected to be served by the Authority’s Action Plan.

Table 1: Ages of Head of Household and Other Adults

Ages of Head of Household	
Head of Household is age 24 years or younger	0%
Head of Household is age 25 to 50	22%
Head of Household is age 51 to 61	19%
Head of Household is age 62 or greater	58%
Ages of Other Adults in Household	
Age 24 years or younger	17%
Age 25 to 50	39%
Age 51 to 61	11%
Age 62 or greater	33%

Table 2: Presence and Ages of Children

Presence and Ages of Children	
Households that only include adults over age 18	86%
Households that include one or more child age 13-17	5%
Households that include children who are all 12 or younger	7%

Table 3: Annual Earned Income of Population to be Served

Sample	
Annual household earnings <\$5,000 per year	8%
Annual household earnings between \$5,000 and \$9,999	9%
Annual household earnings between \$10,000 and \$14,999	43%
Annual household earnings between \$15,000 and \$19,999	14%
Annual household earnings between \$20,000 and \$24,999	8%
Annual household earnings between \$25,000 and \$29,999	4%
Annual household earnings between \$30,000 and \$34,999	3%
Annual household earnings of \$35,000 or higher	12%

Table 4: Elderly/Disability Status of Population to be Served

Elderly/Disability Status of All Household members	
Household includes an elderly member and a disabled member	47%
Household includes an elderly member, does not include a disabled member	8%
Household includes a disabled member, does not include an elderly member	22%
Household includes no elderly persons or persons with disabilities	24%

Table 5: Race and Ethnicity of Population to be Served

Race	Total	Non-Hispanic	Hispanic
White	42%	34%	8%
Black or African-American	30%	28%	2%
American Indian or Alaska Native	1%	0%	0%
Asian	25%	23%	2%
Native Hawaiian or other Pacific Islander	2%	2%	1%
Other Race	0%	0%	0%

III.B – Supportive Services Needs

The following is a list of the supportive service needs of the families expected to enroll in the Authority’s FSS program:

- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerated
- basic skills instruction

- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for childcare
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Access to counseling or treatment for substance abuse and mental health
- Dental care, health care, and mental health care including substance abuse treatment/counseling
- Homeownership readiness

This list of supportive services needs is based on experience with past FSS or other supportive service program participants.

III. C. – Estimate of Participating Families

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

Historically, the Authority’s FSS program has enrolled 20 new families into the FSS program each year. If the Authority receives funding for an FSS coordinator, it expects to expand its FSS program and enroll 50 to 74 new families into the FSS program each year. Accordingly, the Authority would be able to provide FSS Services to between 250 and 370 families over a five-year period.

III. D – Other Self-Sufficiency Programs

The Authority expects to enroll families from the following self-sufficiency programs into the FSS program:

Name of Program		Families per year
✓	Family Unification Program - Family	5
✓	Family Unification Program – Youth (FUP-Y)	0
✓	Foster Youth Initiative (FYI)	5
☐	Resident Opportunity and Self-Sufficiency (ROSS)	0
☐	Jobs Plus	0
✓	Emergency Housing Voucher (EHV)	2
✓	Veterans Affairs Supportive Housing (VASH)	4

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, the date of their application, and the housing program they are enrolled in at the time of their application.

B. Admissions Preferences

The FSS program will provide a preference for families who meet each of the preference types identified by a checkmark in the following table. The table shows the outreach and selection methods that will be applied to identify and select the households within each preference category. The Authority will give preference on the FSS waiting lists for up to 50% of the total participants in its FSS Program for families meeting one of the preference types defined below.

Preference Type		Outreach Method(s)	Selection Method
✓	Families porting in already enrolled in an FSS program	Families applying to port in will be screened for FSS participation	Date and time of application to port in
✓	FUP/FYI Families that want to take advantage of the Fostering Stable Housing Opportunities (FSHO) Initiative	The Authority will reach out to FUP/FYI families to screen their interest in the FSS Program.	Date and time of application to the FSS Program
✓	Families identified through collaboration with local partners	The Authority's local partners will perform outreach to families identified through collaboration with the Authority	Date and time of application to the FSS Program

If an applicant is eligible to receive preference, as defined above, then that applicant will be placed at the top of the FSS Program's waiting list. If there are other applicants already on the waiting list who have received preference, then all applicants receiving preference will be ordered at the top of the waiting list in the order in which their applications were received. Once all applicants on the waiting list receiving preference have been served, applicants who are not receiving preference will be served.

C. Screening for Motivation

The Authority will use one or more motivational screening factors to measure the family's interest and motivation to participate in the FSS program. The following screening criteria will be used:

The Authority will screen families for motivation to participate in the FSS program by requiring that families who apply to enroll in the FSS program attend an initial orientation session. Each family will be given two opportunities to attend the orientation session and may request accommodation if unable to attend a scheduled orientation session. Accommodations will be offered on a case-by-case basis, depending on the needs of the applicant. Accommodations may include an individually scheduled orientation session, provision of transportation to/from the orientation site, translation services, an

alternative location, a virtual orientation session, or allowance and encouragement to bring children to the session, where possible.

D. Compliance with Nondiscrimination Policies

It is the policy of the Authority to comply with all Federal, State, and local nondiscrimination laws and regulations, including but not limited to the Fair Housing Act, the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the grounds of race, color, sex, religion, national or ethnic origin, family status, source of income, disability or perceived gender identity and sexual orientation. In addition, the 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).

The FSS program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS coordinators will review the file in the staff review meeting to ensure that non-selection is not based on discriminatory factors before the final decision is made. Applicants will be notified in writing of the reason(s) they were not selected for participation and will have the opportunity to appeal the decision (see Hearing Procedures). At all times, the Authority 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 the 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

A family that did not complete the FSS Program may request to re-enroll in the program. Re-enrollment will be allowed at the discretion of the Authority according to the following conditions:

- The family is in good standing with regards to its Public Housing or HCV responsibilities;
- The family was not terminated initially from the FSS Program due to fraud;
- The family will be assessed to determine they are motivated, willing, and capable of completing the FSS contract by obtaining suitable employment and completing all goals that will be identified in the CoP;
- The family must wait for a period of 3 months for re-enrollment in the program after the initial FSS Contract has been terminated; and
- The family will receive low priority by being placed last in the waiting list if any, and behind any other families waiting to enroll in the program.

F. Head of FSS Family

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

- Writing
- A form developed by the Authority
- Other

V. Outreach

The Authority will conduct widespread outreach to encourage enrollment in the FSS program. 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. Outreach efforts will include the activities identified through the checked boxes below:

Outreach Methods		Details, including frequency
<input checked="" type="checkbox"/>	Posting information about FSS on the Authority's website	The Authority will post information on its website at least once a year.
<input checked="" type="checkbox"/>	Posting FSS program flyers in locations likely to be seen by eligible families	The Authority will post FSS Program flyers at least once every 6 months.
<input checked="" type="checkbox"/>	Providing information about the FSS program during scheduled reexaminations	The Authority will mail families information on the FSS Program when mailing out Annual Recertification packets.
<input checked="" type="checkbox"/>	Providing information about the FSS program at voucher orientation sessions	The Authority will provide information to each person receiving a voucher at their initial briefing.
<input checked="" type="checkbox"/>	Holding well-publicized information sessions about FSS, including Resident Councils, Foodbanks, Board meetings, and other Authority events	The Authority will promote the FSS Program at its events held throughout the year.
<input checked="" type="checkbox"/>	Providing information about the FSS program to eligible families by mail	The Authority will mail families information on the FSS Program at once a year.
<input checked="" type="checkbox"/>	Facebook	The Authority will post on Facebook promoting the FSS Plan at least once every six months.
<input checked="" type="checkbox"/>	Twitter	The Authority will post on Twitter promoting the FSS Plan at least once every six months.
<input checked="" type="checkbox"/>	Instagram	The Authority will post on Instagram promoting the FSS Plan at least once every six months.
<input checked="" type="checkbox"/>	LinkedIn	The Authority will post on LinkedIn promoting the FSS Plan at least once every six months.

Outreach informational 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 to all families, using materials in both English and other commonly spoken languages to ensure that non-English and limited English-speaking families receive information and have the opportunity to participate in the FSS Program. In conducting outreach, the Authority will account for the needs of person with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible who wish to participate are able to do so.

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 Authority, are described below.

A. Additional Incentives

The Authority's FSS program provides the following incentives to FSS participants in addition to the FSS escrow account:

- Home Ownership: Families may be allowed to make interim withdrawals from the FSS escrow funds to apply towards a down payment for home ownership by participating in the HCV Homeownership Program which allows HCV subsidy payments to be used towards the purchase of a home.
- Moving Costs: The Authority will assist families with security deposits, application fees, and other costs associated with moving.
- Other Incentives: The Authority will consider if extra services or supplies are needed for FF participants on a case-by-case basis. The Authority will provide relevant needed services or supplies when resources are available.

B. Interim Disbursements

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. A determination of whether the family qualifies for the requested interim disbursement will be made on a case-by-case basis by the FSS Coordinator and an administrative staff representative of the Authority. The FSS coordinator 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. In the case of escrow forfeiture, clients will not be responsible to pay back any interim disbursements of their escrow account received while enrolled in Authority’s FSS Program.

C. Uses of Forfeited Escrow Funds.

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. These funds may be used to support FSS participants in good standing, including, but not limited to, transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP.

Upon written request from a family, the FSS Coordinator will consider the available funds and make a determination. The Authority may also initiate a request for the use of forfeited escrow funds. At the discretion of the FSS coordinator, forfeited escrow funds may be considered in lieu of an interim escrow disbursement. Forfeited FSS escrow funds may be deployed at any time during the term of a household’s CoP. Use of forfeited escrow funds for eligible uses (described below) may be requested by the Head of the FSS family.

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

- Purchasing a vehicle
- Paying down debt
- Childcare
- Training
- Employment or Educational Costs, including:
 - Employment training
 - Employment preparation (e.g., interview training, professional clothing, etc.)
 - Education costs (books, fees, uniforms, tools, etc.)

All requests for use of forfeited escrow funds will be considered on a case-by-case basis.

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 on the program coordinating committee and relationships with other service providers, the coaches will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals:

Supportive Service Category		Specific Service	Source/Partner
✓	Assessment	✓ Vocational Assessment Educational	SF Department of Aging and Adult Services; SF Access to City Employment Program
		✓ Assessment Disability Assessment	
		✓ Disability Other specialized assessments	

Supportive Service Category		Specific Service	Source/Partner
✓	Childcare	✓ Infant Care/Toddler Care Preschool Care	SF Human Services Agency
		✓ Afterschool Care	
		✓ Homework Assistance	
✓	Transportation	✓ Bus passes	SF Municipal Transportation Agency
		✓ Assistance with car repairs	
		✓ Assistance with car purchase	
✓	Education	✓ High School Equivalency/GED	City College of San Francisco
		✓ English as a Second Language	
		✓ Post-secondary certificates	
		✓ Advanced Degrees	
✓	Skills Training	✓ Training in Executive Function	SF Human Services Agency
		✓ Basic Skills Training	
		✓ Emerging Technologies Training	
		✓ Biomedical Training (including CAN, phlebotomy, x-ray, and other tech, etc.)	
		✓ On-the-job Training	
		✓ Apprenticeships	
		✓ Skilled Labor Training	
✓	Job Search Assistance	✓ Resume Preparation	SF Human Services Agency
		✓ Interviewing Skills	
		✓ Dress for Success	
		✓ Workplace Skills	
		✓ Job Development	
		✓ Job Placement	
✓	Micro and Small Business Development	✓ Small Business Development Services	City College of San Francisco
		✓ Small Business Mentoring	
		✓ Entrepreneurship Training	
✓	Health/Mental Health Care	✓ Alcohol and Drug Abuse Prevention	SF Department of Public Health
		✓ Alcohol and Drug Abuse Treatment	
		✓ Primary care	
		✓ Dental services	
		✓ Mental Health Services	
		✓ Health Insurance Advising	
✓	Crisis Services	✓ Crisis Assessment	

Supportive Service Category		Specific Service	Source/Partner
		✓ Crisis Intervention	SF Department of Public Health
		✓ Crisis Management	
		✓ Crisis Resolution	
✓	Child/Adult Protective Services	✓ Needs Assessment	SF Human Services Agency
		✓ Case Planning	
		✓ Information Referral	
✓	Household Management	✓ Training in Household Management	SF Human Services Agency
✓	Homeownership Preparation	✓ Homeownership Education	SF Mayor's Office of Housing and Community Development
		✓ Housing Counseling	
		✓ Downpayment Assistance	
		✓ Other Homeownership Assistance	
✓	Financial Empowerment	✓ Financial education	SF Office of Financial Empowerment
		✓ Financial coaching	
		✓ Banking services	
		✓ Training in money management	
✓	Individual Development Accounts	✓ Matched Savings Accounts	SF Office of Financial Empowerment, Community-Wealth.org
✓	Legal Services	✓ Legal Services	Bay Area Legal Aid
✓	Debt Resolution & Credit Repair	✓ Assistance Negotiating the Resolution of Past-Due Debt	Bay Area Legal Aid

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

A. Identifying Family Support Needs

To help determine the supportive services needs of each family, the FSS coordinator will work with the family to complete an initial informal needs assessment for that family before completion of the initial Individual Training Service Plan (ITSP) and signing of the contract of participation. After enrollment in the FSS program, the FSS coordinator may make referrals to partner agencies for completion of one or more formal needs assessments. These assessments may focus on such issues as: employment readiness and employment training needs, educational needs related to secondary and post-secondary education, financial health, and other topics, depending on the needs and interests of the family. The formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.

B. Delivering Appropriate Support Services

Coaching. All families who participate in the FSS program will be assigned an FSS coordinator who will provide coaching services to help each participating family to:

- 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, the 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.

IX. Contract of Participation

All families enrolled in the FSS program will be required to sign a Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). This section describes the contents of the CoP and the Authority's policies and practices regarding the CoP.

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 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.

B. ITSP goals

Each individual's ITSP will establish specific interim and final goals by which the Authority and the family will measure the family's progress towards fulfilling its obligations under the CoP. For any FSS family that is a recipient of welfare assistance at the outset of the CoP or that receives welfare assistance while in the FSS program, the 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 employment. The FSS coordinator will

work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

C. Determination of Suitable Employment

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

D. Contract of Participation Term and Extensions

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

- i. Circumstances beyond the control of the FSS family, as determined by the Authority, such as a serious illness or involuntary loss of employment;
- ii. Active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension (e.g. completion of a college degree during which the participant is unemployed or under-employed, credit repair towards being homeownership ready, etc.) as determined by the Authority or
- iii. Any other circumstances that the Authority determines warrants an extension.

E. Completion of the Contract

The CoP is completed, and a family's participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members' ITSPs, on or before the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed. The Authority will require a combination of self-certification and third party verification to document completion of ITSP goals.

F. Modification

The Authority and the FSS family may mutually agree to modify the CoP with respect to the ITSP and/or the contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by the Authority as well as the Head of FSS Family. The Authority will allow for modifications to the CoP on a case-by-case basis. The Authority will allow modifications at any time during the term of the CoP.

G. 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 Section X(A).

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

Program Termination

A. Involuntary Termination

The 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:
 - a. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
 - b. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities
 - c. Failure to complete activities and/or goals within the specified time frames; and/or
- II. 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 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.

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

D. Grievance Procedures

Both applicants and participants to the FSS program have the right to disagree with, and appeal, certain decisions of the PHA that may adversely affect them. The process for applicant appeals of Authority decisions is called the "informal review." For participants, the appeal process is called an "informal hearing."

All requests for an informal review or informal hearing must be made in writing and delivered to the Authority either in person or by first class mail, postmarked, by the close of the business day, no later than 15 calendar days from the date on the Authority's denial of assistance. If an informal 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 review or informal hearing shall include, but not be limited to:

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

All participants have the right to obtain legal representation and provide their witnesses.

The person conducting the informal hearing or informal review will make a recommendation to the Authority, but the Authority is responsible for making the final decision as to whether assistance should be granted or denied. The Authority will notify the applicant of its final decision, including a brief statement of the reasons for the final decision.

The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be

made orally or in writing prior to the hearing date. At its discretion, the Authority may request documentation of the “good cause” prior to rescheduling the hearing. If the family does not appear within 20 minutes of the scheduled hearing time and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the Authority within 24 hours of the scheduled hearing date, excluding weekends and holidays. The Authority will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

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 Authority’s decision of whether to admit the family into the HCV Program or any of its other housing 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.

The Authority will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.

XII. Timetable

The Authority implemented its FSS program in 2019 and will continue to implement it per this FSS Action Plan.

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

Reasonable Accommodations, Effective Communications and Limited English Proficiency Requirements

Requests for Reasonable Accommodations

A person with disabilities may request reasonable accommodations to facilitate participation in the FSS program. Requests will be considered on a case-by-case basis. Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator’s response, the family may submit a request in writing in accordance with the agency’s reasonable accommodations policy. The policy is available online at sfha.org.

Request for Effective Communications

A person with disabilities may request the use of effective communication strategies in order to facilitate participation in the FSS program. Examples include: appropriate auxiliary aids and services, such as

interpreters, computer-assisted real time transcription (CART), captioned videos with audible video description, visual alarm devices, a talking thermostat, accessible electronic communications and websites, documents in alternative formats (e.g., Braille, large print), or assistance in reading or completing a form, etc. Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS

Coordinator's response, the family may submit a request in writing in accordance with the agency's effective communications policy. The policy is available online at sfha.org.

Limited English Proficiency

The Authority will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available online at sfha.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, childcare, transportation, training, education, and financial empowerment programs in the area. Implementation will continue to be coordinated, in order to avoid duplication of services and activities.

B. Program Coordinating Committee

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

The PCC will meet at least quarterly 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 Program Coordinators
2. One or more participants served by the FSS program
3. Representatives from a variety of departments, agencies, and individuals across the city of San Francisco, which include but are not limited to the following:
 - San Francisco Department of Homelessness and Supportive Housing
 - San Francisco Human Services Agency
 - Mayor's Office of Housing and Community Development

XV. FSS Portability

A. Portability in Initial 12 Months

While the 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 the Authority to allow for portability within this period to the extent feasible.

B. Moves into the PHA’s Jurisdiction

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, the 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, the 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.

XVI. Other Policies

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

XVII. 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 Authority, as may be required under this part, and which:

1. Shall be maintained by the Authority in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification;
2. Shall be made available for inspection by HUD, the Authority, and the public, as appropriate; and,
3. Shall be deemed to be accurate for purposes of this part, unless the Secretary or the 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 the PHA 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 Authority and all members of the family who will participate in the FSS Program, and which plans are attached to the CoP as exhibits. For additional detail, see § 984.303.

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

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

Enrollment means the date that the FSS family entered into the CoP with the Authority.

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

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

FSS Escrow Credit means the amount credited by the Authority to the FSS family's FSS escrow account.

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

FSS Family in Good Standing Means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the 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 the Authority in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

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

Each ITSP must be signed by the 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 a [organization] 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:
 - a. Are designed to deal with a specific crisis or episode of need;
 - b. Are not intended to meet recurrent or ongoing needs; and,
 - c. 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.