

FAMILY SELF SUFFICIENCY (FSS) ACTION PLAN

for the

THE HOUSING AUTHORITY OF THE CITY OF ALAMEDA

Approved by the Board of Commissioners:

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Contents

I. Introduction	4
II. Program Objectives	4
II.A. Non-Discrimination	4
III. Program Size and Characteristics	5
III.A. Family Demographics	5
III.B. Supportive Services Needs	8
III.C. Estimate of Participant Families	8
III.D. Other Self-Sufficiency Programs	9
IV. Family Selection Procedures	9
IV.A. FSS Waitlist	9
IV.B. Admissions Preference	9
IV.C. Motivation Screening Process	9
IV.D. Compliance with nondiscrimination policies	10
IV.E. Re-enrollment of prior FSS Participant	10
IV.F. Head of FSS Family	10
IV. Outreach	11
VI. FSS Escrow Account and Other Incentives for Participants	11
VI.A Additional Incentives	11
VI.B Interim Disbursements	12
Qualifications for partial Disbursements:	12
VI.C Uses of forfeited escrow funds	13
VII. Family Activities and Support Services	13
VIII. Method of Identifying Family Support Needs and Delivering	14
Appropriate Support Services	14
VIII.A. Identifying Family Support Needs	14
VIII.B Delivering Appropriate Support Services	15
VIII.C Transitional supportive service assistance	15
IX. Contract of Participation	15
IX.A. Form and content of contract	15
IX.B. ITSP Goals	16
X.C. Determination of suitable employment	16

IX.D. Contract of Participation term and extensions	16
IX.E. Completion of the contract	17
IX.F. Modification	17
IX.G. Consequences of noncompliance with the contract	17
X. Program Termination, Withholding of Services and Available Grievance	
Procedures	17
X.A. Involuntary termination	17
X.B. Voluntary Termination	18
X.C. Termination with Escrow Disbursement	19
X.D. Grievance Procedures	19
XI. Assurance of Non-Interference	20
XII. Timetable	20
XIII. Reasonable Accommodations, Effective Communications and Limited	
English Proficiency Requirements	20
Requests for Reasonable Accommodations	20
Request for Effective Communications	20
Limited English Proficiency	21
XIV. Coordination of Services	21
XIV.A. Certification of Coordination	21
XIV.B. Program Coordinating Committee	21
XV. FSS Portability (Applicable to HCV only)	22
XV.A. Portability within initial 12 months and Outgoing Portability	22
XV.B. Moves into the AHA's jurisdiction	22
XI.C. FSS Termination with Disbursement for Porting Families	23

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 of Alameda. The plan was last submitted to HUD on September 30, 2022.

The purpose of the Family Self Sufficiency (FSS) program is to reduce the dependency of Housing Choice and Project-Based Voucher Participants on public assistance by achieving economic independence and self-sufficiency over a five-year period. This FSS Action Plan will establish policies and procedures for carrying out the FSS program in a manner consistent with HUD requirements and local objectives. AHA implemented its current, voluntary FSS program in 2011 and will continue to implement it per this FSS Action Plan.

II. Program Objectives

Under the FSS program, the Housing Authority of the City of Alameda (AHA) will establish relationships with public and private agencies which will enable voucher participant families' opportunities for skills building, job training, counseling, education, and other forms of social services, which should reduce or eliminate the need for public assistance over time as they become active participants in the general workforce and possible candidates for homeownership.

This is a voluntary program and in the event a participant family fails to meet its obligations under the FSS Contract of Participation, the AHA will not terminate the participant family from the voucher program for this non-completion.

II.A. Non-Discrimination

In selecting participating families, selection is made in a nondiscriminatory manner without regard to race, color, religion, sex, national origin, age, familial status, disability, gender, gender identity, gender expression, sexual orientation, marital status, ancestry, source of income or genetic information. in compliance with Title VI of the Civil Rights Act of 1964 as amended, Title VIII of the Civil Rights Act of 1968 as amended, and Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title II of the American's with Disabilities Act, California's Fair Employment and Housing Act, California Unruh Civil Rights Act, and California Disabled Persons Act.

AHA will not discriminate against otherwise qualified persons on the basis of disabilities and will make reasonable accommodations to allow participation in the FSS Program by persons with disabilities.

AHA normally maintains open FSS enrollment and recruitment activities are ongoing throughout the calendar year. Outreach efforts include all eligible families in eligible programs according to our non-discrimination policy and language access plan for limited English proficient participants.

III. Program Size and Characteristics

III.A. Family Demographics

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

The FSS program will serve the following housing assistance programs:

1. Housing Choice Vouchers (HCV): Tenant-Based Vouchers
2. Housing Choice Vouchers (HCV): Project-Based Vouchers (PBV)
3. Housing Choice Vouchers (HCV): Other Special purpose vouchers:
 - a. Family Reunification Program (FUP)
 - b. Veterans Affairs Supportive Housing (VASH)
 - c. Emergency Housing Vouchers (EHV)
 - d. Mainstream (MS)
 - e. Non-elderly disabled (NED)
4. Single Room Occupancy Moderate Rehabilitation program

Ages of Head of Household and Other Adults

	Percent
Ages of Head of Household	
--Head of Household is age 24 years or younger	1%
--Head of Household is age 25 to 50	24%
--Head of Household is age 51 to 61	24%
--Head of Household is age 62 or greater	51%
Ages of Other Adults in Household	
-- Age 24 years or younger	33%
-- Age 25 to 50	35%
-- Age 51 to 61	12%
-- Age 62 or greater	20%

Presence and Ages of Children

	Percent
Presence and Ages of Children	
--Households that only include adults over age 18	77%
--Households that include one or more child age 13-17	15%
--Households that include children who are all 12 or younger	8%

Employment Status of Population to be Served

	Percent
Employment Status of Head of Household	
--Families with an employed head	35%
--Families whose head is unemployed	6%
Employment Status of All family members	
--Families with any member that is employed	62%
--Families with no employed member	38%

Annual Earned Income of Population to be Served

	Percent
Annual household earnings <\$5,000 per year	6%
Annual household earnings between \$5,000 and \$9,999	8%
Annual household earnings between \$10,000 and \$14,999	31%
Annual household earnings between \$15,000 and \$19,999	16%
Annual household earnings between \$20,000 and \$24,999	10%
Annual household earnings between \$25,000 and \$29,999	6%
Annual household earnings between \$30,000 and \$34,999	5%
Annual household earnings of \$35,000 or higher	18%

Elderly/Disability Status of Population to be Served

	Percent
Elderly/Disability Status of Head of Household	
--Head of Household is an elderly person without disabilities	19%
--Head of Household is an elderly person with disabilities	32%
--Head of Household is a non-elderly person with disabilities	17%
--Head of Household is neither an elderly person nor a person with disabilities	32%
Elderly/Disability Status of All Household members	
--Household includes an elderly person without disabilities	22%
--Household includes an elderly person with disabilities	32%
--Household includes a non-elderly person with disabilities	22%
--Household includes no elderly persons or persons with disabilities	24%

Race and Ethnicity of Population to be Served (required)

Race	Non-Hispanic	Hispanic
White 29%	10%	19%
Black or African-American 34%	1%	33%
American Indian or Alaska Native 1%	0%	1%
Asian 35%	0%	35%
Native Hawaiian or other Pacific Islander 1%	0%	1%
Other Race 0%	0%	0%

III.B. Supportive Services Needs

AHA's FSS program, in collaboration with the community partners, will offer the following supportive services and referrals to, applicable community agencies, who are able to assist participant families in reaching their individualized self-sufficiency goals:

- Parenting/Household/Life skills classes
- Employment training, including sectoral training and/or accelerated basic skills instruction
- Job Training/Preparation/Job Retention Services
- GED preparation
- Higher education guidance and support
- English as a Second Language classes
- Assistance accessing and paying for childcare
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Counseling or treatment for substance abuse and mental health
- Dental care, health care, and mental health care including substance abuse treatment/counseling
- Homeownership readiness classes

A participant family's specific needs will be determined during the FSS enrollment process when they complete the mandatory needs assessment to determine their Individualized Training and Support Plan (ITSP).

The above listing of supportive services needs is based on experience with past FSS or other supportive service program participants.

III.C. Estimate of Participant Families

Over time, AHA 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.

In recent years, AHA has been funded for one FSS coordinator. The number of participant families required to be served based on this funding is at least 25 participant families. The Housing Authority of the City of Alameda (AHA) meets the minimal threshold of at least

25 participant families in the Family Self Sufficiency program with 26 current participant families under contract in its Family Self-Sufficiency program. AHA's goal is to increase to 50 participant families whenever fiscally sound to do so.

Historically, AHA's FSS program has enrolled six to nine new families into the FSS program each year. Accordingly, AHA expects to be able to provide FSS services to around 60 families over a five-year period.

III.D. Other Self-Sufficiency Programs

Due to active outreach to all eligible program families, AHA expects to enroll participant families from other self-sufficiency programs such as FUP-Family and FUP-Youth; EHV and VASH participation into the FSS program. However, due to the small size of these programs with the AHA, the AHA does not expect to enroll an annual number of families in each program. AHA will work in collaboration with the existing support services to ensure the best outcomes for enrolled FSS participants.

IV. Family Selection Procedures

IV.A. FSS Waitlist

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 specific household member(s) interested in participating the FSS program since only one FSS Contract of Participation (COP) is allowed per household but may contain multiple Individual Training and Services Plans.

IV.B. Admissions Preference

The FSS program will allow for a preference for participants in the FUP youth program. These households must be in good standing and on a time-limited voucher. Families will be selected based on the following selection method:

Other: Date and time the family expressed an interest in participating in the FSS program.

IV.C. Motivation Screening Process

AHA will use one or more motivational screen factors to measure the family's interest and motivation to participant in the FSS program. The following screening criteria will be used: The AHA 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 either in person or virtually. FSS families will be asked to complete a self-assessment. Accommodations for those with disabilities will be offered on a case-by-case basis, depending on the needs of the applicant.

Accommodations may include additional time to complete an application or self-assessment, 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.

IV.D. Compliance with nondiscrimination policies

It is the policy of AHA 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, AHA'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, AHA will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

IV.E. Re-enrollment of prior FSS Participant

Family members who were not Heads of FSS Family previously may be allowed to re-enroll in the FSS program. The family will be processed in the same order as all applicants as though the family had never participated in the FSS program. The application date used would be the most recent date requested for re-enrollment.

IV.F. Head of FSS Family

The Head of the FSS family, any adult member of the household, is designated by the participating family. The AHA 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 AHA in writing on a specific form developed by AHA.

IV. Outreach

The AHA will conduct widespread outreach to encourage enrollment in the FSS program. Efforts will be made to provide program information in several languages per the AHA's Language Access Plan including providing information in languages other than English. Interpreters will be used as needed and clients may contact staff to express interest in person, via telephone, online through the participant portal, or by email. AHA's marketing activities to possible FSS program participants will include:

- a) Distribution of FSS program brochures to any participant who has requested additional information prior to becoming a new FSS participant
- b) Conducting FSS program presentations during Voucher briefings for new participants
- c) Reminder of FSS program and its benefits in AHA Participant Newsletters and annual re-examination packets
- d) Displaying FSS program posters throughout agency to market program
- e) Posting FSS program information and application on AHA's website
- f) Holding well-publicized information sessions about FSS program

Outreach will comply with all applicable fair housing protections.

VI. FSS Escrow Account and Other Incentives for Participants

The FSS program provides for the establishment of an escrow account. The amount of the escrow credit is based on increases in the family's total tenant payment (TTP) resulting from increases in the family's earned income during the term of the FSS contract subsequent to signing the contract. FSS escrow credits will be calculated monthly and in accordance with HUD regulations. Interest on the FSS escrow account balances will be allocated monthly.

The money in the escrow account belongs to the Housing Authority until the FSS participant completes the goals in the Contract of Participation. Upon successful completion of the contract, the participant shall receive all of the money in the escrow account less any amount owed to the Housing Authority.

VI.A Additional Incentives

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account are described in the following sections. No additional incentives will be offered.

VI.B Interim Disbursements

The AHA will allow for interim disbursement on a case-by-case basis. The AHA will permit the family to withdraw funds from the FSS escrow account before completion of the contract if the family has completed specific interim goals, designated by the HA, and needs some of the FSS escrow account funds 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). **Partial Disbursement of Escrow Account Funds to FSS Participant:**

An FSS Participant in good standing with the AHA and FSS program may request a partial disbursement of escrow account funds up to but not exceeding 50% of the total balance at time of request one time during their 5-year contract of participation.

FSS Participant must submit in writing, to FSS Coordinator, a request for funds, specifically stating the purpose of the funds request and how the expenditure will assist participant to further their FSS contract goals.

Some examples of potentially eligible activities include, but are not limited to, childcare expenditures, transportation expenditures, work related expenditures, job training or educational expenditures, credit repair and/or other activities that support a family's effort to achieve self-sufficiency.

The written request must be signed and dated by the FSS participant. FSS Coordinator will then review participant's FSS file and determine if all qualifications for partial disbursement have been met.

Qualifications for partial Disbursements:

- a) FSS participant and household is in compliance with Family Obligations
- b) FSS participant must have been actively participating on FSS program for at least one year.
 - i. Actively participating defined: completing quarterly check-ins, attending FSS-sponsored workshops and functions; working towards completing goals.
- c) Participants must have successfully completed at least one interim goal.
- d) Participants must have accumulated at least \$1000 in their escrow account prior to requesting partial disbursement.
 - i. A waiver to the minimal \$1000 amount is possible in the event of extreme hardship.

Once qualifications are determined successful, FSS Coordinator then forwards written request and successful qualifications documents to Director of Housing Programs for

approval. Director of Housing Programs will review requests, qualifications and make a determination to approve or disapprove. If approved, a written check request and supportive documentation is completed and forwarded to Executive Director for final approval and signature.

At all times possible, the expenditure must be such that the payment can be made directly to vendor. The FSS participant must provide vendor information including billing and/or price amounts.

VI.C Uses of forfeited escrow funds

Forfeited escrow funds remaining from terminated participants will be collected in a general fund and may be used for families in good standing achieving the goals outlined in the family's contract of participation such as transportation, childcare, job training/education, testing fees, or employment preparation. Funds may be used for training the FSS Coordinator (up to \$1,500 per year).

To obtain the use of available funds, the head of the FSS family must submit a written request to the FSS Coordinator stating the amount desired and the proposed use of the funds. Within 90 days of distribution of funds, the family must submit documentation of the use of the funds for the approved activities.

VII. Family Activities and Support Services

Case management and supportive services referrals are a key factor in ensuring comprehensive service delivery. Case management establishes a systematic, continuous process in which families are actively involved in planning the steps they can take to improve their lives and in evaluating the results based on participant's initial needs assessment completed at time of enrollment.

Case management is not merely service brokering, but a problem-solving partnership among practitioners and clients. AHA employs an FSS Program Coordinator who fulfills the following functions:

- Assist in briefing of applicants.
- Provide information and referral services to participants.
- Monthly one on one coaching sessions in person or via telephone or virtually
- Monthly goal enrichment group meetings
- Coordinate services for participants with various Health and Human Services/Social Services agencies, and other non-profit groups
- Monitor participant's progress in meeting goals set out in ITSP
- Work with other agencies' case managers
- Assist in identifying and utilizing appropriate community resources for:

Resource	Partners
Educational, skills training, vocational or disability related assessments	Peralta College, Alameda Adult School, Alameda Literacy Program, and Regional Center of the East Bay
Childcare resources	Boys and Girls Club, Girls Inc of the Island, Bananas
Transportation needs	Alameda Contra Costa Transit (AC Transit)
Job search Assistance	College of Alameda Career & Employment Center
Micro and Small Business Development	College of Alameda Career & Employment Center
Physical/Mental Health care	Alameda Family Services and Alameda Alliance, Meals on Wheels
Crisis Services	Alameda Family Services, 211, and Alameda County Justice Family Center
Child/Adult Protective Services	Alameda County Child Protective Services and Alameda County Adult Protective Services
Household Management	AHA consultant (currently LifeSTEPS)
Financial Empowerment	Provident Credit Union
Legal Services	East Bay Community Law Center, Centro Legal De La Raza, and Housing and Economic Rights Advocates
Debt Resolution& Credit Repair	Provident Bank

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

VIII.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.

VIII.B Delivering Appropriate Support Services

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

- Understand the benefits of participating in the FSS program and how the program can help the family achieve its goals.
- Identify achievable, but challenging interim and final goals for participation in the FSS program, break down the goals into achievable steps and accompany the family through the process.
- Identify existing family strengths and skills.
- Understand the needs that the family has for services and supports that may help the family make progress toward their goals.
- Access services available in the community through referral to appropriate service providers.
- Overcome obstacles in the way of achieving a family's goals.

VIII.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, AHA 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

Each Head of FSS families enrolled in the FSS program will be required to sign a five-year Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). AHA will use a contract format approved by HUD. The contract will include an Individual Training and Services Plan (ITSP).

IX.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 AHA, 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.

IX.B. ITSP Goals

Each individual's ITSP will establish specific interim and final goals by which the AHA 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 AHA 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.

X.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 AHA 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.

IX.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. AHA will grant the extension if it finds that good cause exists to do so.

In this context, good cause means:

- a. Circumstances beyond the control of the FSS family, as determined by the AHA such as a serious illness or involuntary loss of employment;
- b. 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 AHA or
- c. Any other circumstances that the AHA determines warrants an extension

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

IX.F. Modification

The AHA 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 AHA as well as the Head of FSS Family.

The AHA will allow for modifications to the CoP under the following circumstances:

- a. When the modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency
- b. When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, after consultation with the AHA, designate another family member to be the FSS head of family
- c. When a relocating family is entering the FSS program of a receiving PHA and the start date of the CoP must be changed to reflect the date the new CoP is signed with the receiving PHA

The AHA will allow modifications at any time during the term of the CoP.

IX.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

X.A. Involuntary termination

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

- 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:

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

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

X.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.

X.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:

- a. Services that the AHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.
- b. The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the AHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- c. 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. The participating family will receive a disbursement of its escrow funds upon successful completion of the Contract of Participation.

Successful Completion is defined as:

1. Written verification that Head of Household has satisfied final goal requirements set out in ITSP for suitable employment.
2. Written verification that no one in FSS participant's household has received any Federal, State or other public welfare assistance at the graduation date of contract of participation

The Family Self-Sufficiency Coordinator and the Director of Housing Programs will review final disbursement requests and written verifications. A thorough audit of the Escrow Account ledger and FSS Participant's case file will be made prior to final disbursement. The family may use its final disbursement escrow funds for any purpose.

X.D. Grievance Procedures

A family that is terminated from the FSS Program has the right to request an Informal Hearing.

The procedures for requesting, scheduling and conducting an Informal Hearing will comply with the Informal Hearing Policies and Procedures of the Housing Authority, as described in the Housing Authority's Administrative Plan.

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 AHA's decision of whether to admit the family into the AHA's program. 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.

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

XII. Timetable

AHA implemented its FSS program in 2011 and will continue to implement it per this FSS Action Plan.

XIII. 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 to ra@alamedahsg.org; however, requests can be made to the FSS Coordinator. The household may also make a request by calling (510) 747-4326 or by fax at (844) 327-5415. An online form is available at: <https://form.alamedahsg.org/Forms/RsIVQ>. The policy is available online at <https://www.alamedahsg.org/housing-programs/reasonable-accomodations/>.

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, accessible electronic communications and websites, documents in alternative formats (e.g., Braille, large print), or assistance in reading or completing a form. This is not an exhaustive list.

See above for requesting reasonable accommodation for methods to submit a request.

Limited English Proficiency

The AHA 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 <https://www.alamedahsg.org/resource-library/agency-documents/>.

XIV. Coordination of Services

XIV.A. Certification of Coordination

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

XIV.B. Program Coordinating Committee

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

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

- a. One or more FSS Program Coordinators
- b. One or more participants from each HUD rental assistance program served by the FSS program.
- c. Representatives from a variety of agencies and individuals, which may include but are not limited to the following:
 - Local agencies responsible for carrying out JOBS training programs (College of Alameda Career and Employment Center),
 - Public and private education or training institutions (College of Alameda Career and Employment Center),
 - Childcare providers,

- Nonprofit service providers, private business (e.g. Alameda Housing Authority, Alice Home Care, Meals on Wheels, and Operation Dignity),
- Any other public and private service providers with resources to assist the FSS program (Provident Credit Union and Alameda Chamber of Commerce and Economic Alliance), and
- Other organizations, such as other State, local or tribal welfare and employment agencies.

XV. FSS Portability (Applicable to HCV only)

XV.A. Portability within initial 12 months and Outgoing Portability

In order to participate in the FSS Program, families must live in the initial jurisdiction for not less than one year before the family will be considered for a move under portability. AHA has the authority to approve a family's request to move during this period under certain circumstances.

After one year a family can choose to continue to participate in the FSS Program but move to another jurisdiction if the family can demonstrate to the satisfaction of AHA that it will be able to fulfill its responsibilities under the original (or a modified) Contract of Participation in the receiving jurisdiction.

If a participating family moves and is unable to fulfill its obligations under the Contract of Participation (or a modification thereof), AHA will terminate the participating family from the FSS Program and the family will forfeit its escrow account.

If the family is participating in the FSS Voucher program and moves outside the AHA's jurisdiction, AHA will transfer the balance of the family's escrow account upon receipt of a written request from the receiving Housing Authorities FSS staff providing proof that the participating family has been admitted to the receiving Housing Authority's FSS program.

This notice must be received by AHA FSS program staff within 120 days from lease up. Failure to enroll into receiving Housing Authority's FSS program within 120 days from lease up and failure for the receiving Housing Authority and AHA to agree on the family's continuation in the AHA's FSS program, the family will be terminated from the AHA FSS program and the family will forfeit its escrow account.

XV.B. Moves into the AHA's jurisdiction

AHA is not obligated to accept incoming portable FSS participants into the FSS program. Acceptance of incoming portable clients into the AHA FSS program is entirely at the discretion of AHA. It is the responsibility of all FSS families exercising portability into the jurisdiction of AHA to notify AHA of their status in the FSS program.

Incoming Port FSS Participants have 120 days from lease up in AHA's jurisdiction to notify AHA FSS staff about their desire to transfer their Contract of Participation to AHA jurisdiction.

If AHA accepts the family into the FSS program, the AHA will execute a new FSS Contract of Participation. The client will remain in the AHA FSS program until 5 years from the start of their initial contract with their initial Housing Authority unless early graduation, termination, or extension of their contract by AHA occurs.

XI.C. FSS Termination with Disbursement for Porting Families

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

Where continued FSS participation is not possible, AHA 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.