

FAMILY SELF-SUFFICIENCY PROGRAM

ACTION PLAN



HOUSING
COMMUNITY
ECONOMIC

LACDA

Los Angeles County Development Authority



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I. Introduction

This document constitutes the Family Self-Sufficiency (FSS) Program Action Plan for the FSS Program operated by the Los Angeles County Development Authority (LACDA). FSS Program Action Plan was submitted to HUD on September 30, 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 Program 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 Program Action Plan describes the LACDA's local policies for the 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 the U.S. Department of Housing and Urban Development (HUD) handbooks. The policies in this FSS Program Action Plan have been designed to ensure compliance with all approved applications for HUD FSS Program funding.

The FSS Program and the functions and responsibilities of PHA (Public Housing Agency) staff are consistent with the LACDA's personnel policy and 5-Year Public Housing Agency Plan.

II. Program Objectives

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

- Attain resources, skills, and education,
- Increase their earned income,
- Build financial capability, and
- Achieve their financial goals.

III. Program Size and Characteristics

III.A. - Family Demographic

The tables describe the demographics from the population expected to be serviced by the LACDA's Action Plan. The demographics were calculated based on families that may be eligible for the FSS Program. Changes in the demographics of FSS families are expected to fluctuate over time.

The FSS Program will serve the following housing programs:

- ✓ Public Housing
- ✓ Housing Choice Voucher (HCV) - Tenant-Based Vouchers
- ✓ HCV - Project-Based Vouchers (PBV)
- ✓ Section 8 - Moderate Rehabilitation
- ✓ HCV - Other special purpose vouchers:
 - HUD-Veterans Affairs Supportive Housing (HUD-VASH);
 - Emergency Housing Vouchers; and
 - Family Unification Program (i.e. FUP Families and Youth; Foster Youth to Independence (FYI).

(as of 09-14-2022)

Ages of Head of Household and Other Adults	
Ages of Head of Household	Percent
--Head of Household is age 24 years or younger	1.20%
--Head of Household is age 25 to 50	37.30%
--Head of Household is age 51 to 61	22.18%
--Head of Household is age 62 or greater	39.32%
Ages of Other Adults in Household	Percent
-- Age 24 years or younger	78.12%
-- Age 25 to 50	13.20%
-- Age 51 to 61	3.01%
-- Age 62 or greater	5.67%

Presence and Ages of Children	
Presence and Ages of Children	Percent
--Households that only include adults over age 18	56.59%
--Households that include one or more child age 13-17	19.34%
--Households that include children who are all 12 or younger	24.07%

Employment Status of Population to be Served	
Employment Status of Head of Household	Percent
--Families with an employed head	22.80%
--Families whose head is unemployed	77.20%
Employment Status of All family members	Percent
--Families with any member that is employed	27.18%
--Families with no employed member	72.82%

Annual Earned Income of Population to be Served	
Annual household earnings	Percent
Annual household earnings <\$5,000 per year	6.57%
Annual household earnings between \$5,000 and \$9,999	8.31%
Annual household earnings between \$10,000 and \$14,999	39.01%
Annual household earnings between \$15,000 and \$19,999	11.48%
Annual household earnings between \$20,000 and \$24,999	10.49%
Annual household earnings between \$25,000 and \$29,999	5.70%
Annual household earnings between \$30,000 and \$34,999	4.59%
Annual household earnings of \$35,000 or higher	13.85%

Elderly/Disability Status of Population to be Served	
Elderly/Disability Status of Head of Household	Percent
--Head of Household is an elderly person without disabilities	15.79%
--Head of Household is an elderly person with disabilities	23.52%
--Head of Household is a non-elderly person without disabilities	21.03%
--Head of Household is neither an elderly person nor a person with disabilities	39.65%
Elderly/Disability Status of All Household members	Percent
--Household includes an elderly person without disabilities	15.79%
--Household includes an elderly person with disabilities	23.52%

--Household includes a non-elderly person with disabilities	39.65%
--Household includes no elderly persons or persons with disabilities	21.03%

Race and Ethnicity of Population to be Served (required)			
Race		Non-Hispanic	Hispanic
White	44.03%	9.42%	34.55%
Black or African-American	46.76%	44.75%	1.54%
American Indian or Alaska Native	0.89%	0.37%	0.51%
Asian	6.31%	6.19%	0.11%
Native Hawaiian or other Pacific Islander	0.53%	0.37%	0.16%
Other Race	1.47%	0.17%	0.33%

III.B. - Supportive Services Needs

The LACDA will provide access to supportive services through coordination with existing service agencies delivered through a combination of both on- and off-site service delivery mechanisms. The following is a list of the services offered by the LACDA and service agency partnerships to serve the needs of the families expected to enroll in the LACDA’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 above is based on experience with past FSS participants.

III.C. - Estimate of Participating Families

Over time, the LACDA 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, the LACDA has been funded for 10 of coordinators. At this time, the minimum number of participants required to be served based on this funding is 250.

The LACDA’s FSS Program has enrolled an average of 67 new families into the FSS Program each year. Accordingly, the LACDA expects to be able to provide FSS Services to 346 families over a five-year period.

In accordance with CFR §984.105, the LACDA has a remaining FSS Program mandate to serve 346 families. This is calculated based on the table below. This is our best estimate at this time, and it includes the mandate for the Public Housing program and the HCV program and counts graduates from both programs.

Original Number of Participants Mandated in both HCV and PH	FSS Graduates	Remaining Mandatory Slots
1326	980	346

Therefore, as of the time of preparation of this Action Plan, the LACDA expects to be able to serve 346 families in the FSS Program at any one time.

III.D. - Other Self-Sufficiency Programs

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

Name of Programs
• Family Unification Program (FUP)
• Family Unification Program – Youth (FUP-Y)

• Foster Youth Initiative (FYI)
• Emergency Housing Voucher (EHV)
• Veterans Affairs Supportive Housing (VASH)

IV. Family Selection Procedures

A. Waiting List

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

General Application Process

Subsequent to outreach and recruitment efforts (see section V. Outreach), the LACDA will invite eligible families to attend an FSS enrollment appointment. During the appointment, the family will receive the requirements and benefits of participating in the FSS Program. Families that cannot attend an enrollment appointment may be accommodated and may opt to receive an application along with marketing materials describing the FSS Program by mail, e-mail, or in person.

Submittal of a completed application constitutes notification to the LACDA and its FSS Program of the family's interest in participating in the FSS Program.

The LACDA will make up to three attempts to schedule an enrollment appointment, which may be in-person (which includes virtual meetings), by phone, by email, and/or by mail.

Denial of Participation

The LACDA may deny participation to families who wish to join the FSS Program, if the interested party:

1. Owes money to the LACDA or any other PHA;
2. Does not respond to the three attempts made to schedule an enrollment appointment; and/or
3. Has successfully met the terms of a previous FSS contract with the LACDA or another PHA and officially graduated from the FSS Program with or without an escrow savings account.

B. Admissions Preferences Instructions

The FSS Program will provide a preference for families who meet each of the preference types identified in the following table. The table shows the percent of FSS slots to which the preferences apply, and the outreach and selection methods that will be applied to identify and select the households within each preference category.

Preference Type	% of FSS Slots	Outreach	Selection Method
FUP-Y/FYI Families that want to take advantage of the Fostering Stable Housing Opportunities (FSHO) Initiative	21%	See Section V. Outreach	Date and time of application to the FSS Program.
The LACDA’s FSS Program will give preference to incoming portable families with an active FSS CoP	2%	See Section V. Outreach	Date and time of application to the FSS Program.

C. Screening for Motivation.

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

D. Compliance with Nondiscrimination Policies

It is the policy of LACDA 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, Section 504 of the Rehabilitation Act of 1973, and the California FEHA Act.

It is the policy of the LACDA to comply fully with all Federal, State and local nondiscrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment.

As such the LACDA will not exclude persons 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.

Further, the LACDA shall not deny any family or individual the opportunity to apply for the FFS Program or any other rental assistance under its rental assistance programs on the basis of race, color, sex, religion, gender, gender identity and expression, family status, national origin, marital status, ancestry, age, sexual orientation, disability, source of income, medical condition, military

and veteran status, genetic information, arbitrary characteristics, or any other basis prohibited by law.

The LACDA will provide Federal, State, and local information to families during the family screening orientation regarding discrimination, and the recourse available to them if they are victims of discrimination. Families will be informed that they may file a fair housing complaint using the toll-free hotline at 1-800-669-9777 and that persons with hearing or speech impairments may access this number via TTY by calling the Federal Information Relay Service at 1-800-887-8339.

In addition, LACDA's FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they have equal access and are able to take advantage of the services provided by the FSS Program (see Section XIII.(A). Requests for Reasonable Accommodations).

The FSS Program staff has the primary responsibility to ensure that families 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 Section X.(A) Involuntary Termination). At all times, LACDA 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 LACDA's FSS program:

- FSS participants who have withdrawn voluntarily.
- FSS participants who failed to complete the CoP a year after FSS termination.
- Families terminated with escrow disbursement.
- Families involuntarily terminated that are in good standing with the LACDA.
- Family members who were not Heads of FSS Family previously.

F. Head of FSS Family

The head of the FSS family is designated by the participating family. The LACDA 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 in between the contract term, by the household to the Head of the FSS family must be submitted to the LACDA in writing through the "FSS Program Head of Household Designation Certification" form. Any changes made in between the contract term will require an amendment to the FSS CoP.

V. Outreach

The LACDA will conduct widespread outreach to encourage enrollment in the FSS program. Outreach efforts will include the activities identified below. Interpreters will be used as needed and clients may contact staff to express interest in person, via phone, or by email.

- Information about FSS Program on the LACDA’s website will be continuous and updated as necessary indefinitely.
- FSS program flyers will be included during the annual re-examination process. In addition, the FSS flyers are available at LACDA administrative and property management offices daily for residents in locations likely to be seen by eligible families.
- Providing information about the FSS Program annually during re-examinations. The FSS flyer will be included in the annual re-examination packets.
- Providing information about the FSS Program at each voucher orientation session. A flyer will be provided.
- Holding well-publicized information sessions about FSS monthly.
- Providing information about the FSS Program to eligible families by mail, e-mail, or phone at the request of the tenant. The FSS flyer will be e-mailed and mailed to the families.

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, Spanish, and other frequently requested 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 LACDA 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 LACDA, are described below.

A. Additional Incentives

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

B. Interim Disbursements

The LACDA will allow for interim disbursements on a case-by-case basis. Families may request an interim disbursement for a portion of the escrow account once the FSS family has fulfilled at least one interim goal and is employed, 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).

The requests must be made through the term of the Contract of Participation (CoP) and in writing. The family will be eligible to request the funds twice or up to \$1,500, whichever comes first. 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 LACDA's Manager overseeing the FSS Program Supervisor. 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. Any interim disbursement will be deducted from the participant's escrow balance.

C. Uses of forfeited escrow funds

Generally, FSS families will automatically forfeit their FSS escrow if any of the following occurs:

- The family fails to complete the goals listed on their CoP;
- The family voluntarily withdraws from the FSS program;
- The family moves into another Housing Authority's jurisdiction which does not have an FSS program, the relocating FSS family cannot fulfill its responsibilities under their initial CoP (see Section X.(C)Termination with Escrow Disbursement) for exception;
- The family is not accepted into the receiving PHA FSS program.
- The family is removed from the HCV/Public Housing program for non-compliance of the assisted lease agreement and/or HCV/PH policy and rules (see AP/ACOP for more information).

Treatment of forfeited FSS escrow account funds:

FSS escrow account funds forfeited by the FSS family (if any) will be used to support FSS participants in good standing. Upon written request from a family, the FSS Coordinator will

initiate a meeting with the PCC (one member minimum) to consider the available funds and make a determination.

FSS escrow account funds in lieu of Interim Disbursements.

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:

- Any time during the term of a family’s CoP.

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

- LACDA
- The Head of the FSS family

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

Eligible Uses	Guidelines / Limitations
<p style="text-align: center;">Debt Repayment</p>	<p>Interim disbursements will be allowed for repayment of debt incurred prior to starting the FSS program. FSS families must provide third-party documentation of the debt, must be engaged in financial coaching, and the request must be supported by their financial coach/organization.</p> <p>The FSS family must be in good standing and a clear relationship (nexus) must exist between the debt and continued success in the FSS Program ITSP Goals.</p> <p>Requests will be considered on a case-by-case basis and payments will be made to the debt collector on behalf of the FSS family. Priority will be given to requests that are necessary to stabilize housing for FSS families.</p>
<p style="text-align: center;">Vehicle Repairs</p>	<p>FSS families must provide written third-party verification for any of any expenses that are incurred during the term of the CoP (i.e. receipts, bills, statements).</p> <p>The FSS family must be in good standing and a clear relationship (nexus) must exist between the debt and continued success in the FSS Program ITSP Goals.</p> <p>Amount of Expense: The FSS Coordinator will determine local average costs as a guideline. If the cost of repair exceeds the guideline, the FSS Coordinator may calculate the allowance using the guideline.</p> <p>If the FSS family provides a bill or unpaid statements for expenses they will be required to provide third-party</p>

	<p>documentation proving the expenses were paid as a contingency for the release of escrow funds.</p> <p>Requests will be considered on a case-by-case basis.</p>
<p>Child Care</p>	<p>Child care expenses are for children under 13 years of age and enable the FSS member to work, search for work, or attend school.</p> <p>FSS families must provide written third-party documentation of expenses that are incurred (i.e. receipts, bills, statements).</p> <p>The FSS family must be in good standing and a clear relationship (nexus) must exist between the debt and continued success in the FSS Program ITSP Goals.</p> <p>Amount of Expense: The FSS Coordinator will determine local average costs as a guideline. If the hourly rate materially exceeds the guideline, the FSS Coordinator may calculate the allowance using the guideline.</p> <p>Requests will be considered on a case-by-case basis.</p>
<p>Training for participants</p>	<p>FSS families must provide written third-party verification for any of any expenses that are incurred (i.e. receipts, bills, statements).</p> <p>These expenses must be necessary for success in the program, and a nexus must clearly exist between the expense and the program (i.e. tools for trade school or books for class).</p> <p>If the FSS family provides a bill or unpaid statements for expenses they will be required to provide third-party verification proving the expenses were paid as a contingency for the release of escrow funds.</p> <p>Requests will be considered on a case-by-case basis</p>
<p>Employment or Educational Costs, including:</p> <ul style="list-style-type: none"> a. Employment training b. Employment preparation (e.g. interviews training, professional clothing, etc.) c. Education costs (books, fees, uniforms, tools, etc.) 	<p>FSS families must provide written third-party verification for any of any expenses that are incurred (i.e. receipts, bills, statements).</p> <p>These expenses must be necessary for success in the program, and a nexus must clearly exist between the expense and the program (i.e. tools for trade school or books for class).</p> <p>If the FSS family provides a bill or unpaid statements for expenses they will be required to provide third-party verification proving the expenses were paid as a contingency for the release of escrow funds.</p>

	Requests will be considered on a case-by-case basis.
Training for FSS Program staff	Requests for funding must be approved by LACDA, Housing Assistance Division Director.

The use of forfeited escrow funds must be requested in writing by the Head of the FSS family and FSS Coordinator. During the term of the CoP, the family will be eligible to access funds up to two times or receive \$2,500, whichever comes first. The LACDA will generally make payments on behalf of the family, unless mitigating circumstances require the family to make the payments directly. Any direct payments made by the family with forfeited escrow funds will require third-party verification.

Upon the LACDA receiving the written request from the head of FSS, the LACDA’s Manager overseeing the FSS Program Supervisor will consider the available funds and make a determination.

VII. Family Activities and Supportive Services

All families participating in the FSS Program will benefit from coaching that helps them identify and achieve the 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. The LACDA will provide referrals to supportive services for categories but not limited to:

Supportive Service Category	Specific Service	Source/Partner
Assessment	Vocational Assessment Educational Assessment Disability Assessment Other Specialized Assessments	America’s Job Center of California (AJCC) Department of Rehabilitation (DOR), LA County Department of Mental Health Local Community Colleges, and Universities Vocational Schools.
Child Care	Infant Care/Toddler Care Preschool Care Afterschool Care Homework Assistance	Crystal Stairs, Child Care Resource Center, Local Schools, YMCA, and First 5 LA.
Transportation	Bus Passes	MTA, and Antelope Valley Transit Authority.
Education	High School Equivalency/GED English as a Second Language Post-Secondary Certificates Advanced Degrees Training in executive functions	Local Adult Schools, Local Public Libraries, Local Community Colleges, and/or Vocational schools.
Skills Training	Basic Skills Training Emerging Technologies Training On-the-Job Training Apprenticeships Skilled Labor Training Biomedical Training (Including CNA, Phlebotomy, X-Ray, and other tech, etc.)	America’s Job Center of California (AJCC), Department of Rehabilitation (DOR), Local Community Colleges, Universities, and/or Vocational Schools.

Job Search Assistance	Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement	America's+C20:C38 Job Center of California (AJCC), Department of Rehabilitation (DOR), Local Community Colleges, Universities, and/or Vocational Schools.
Micro and Small Business Development	Small business development services Small business Mentoring Entrepreneurship Training	Small Business Development Centers (SBDC), Los Angeles County Consumer & Business Affairs, Local Community Colleges, and/ or Vocational Schools.
Health/Mental Health Care	Alcohol and Drug Abuse Prevention Alcohol and Drug Abuse Treatment Primary care Dental services Mental Health Services Health Insurance Advising	America's+C20:C38 Job Center of California (AJCC), Department of Rehabilitation (DOR), Local Community Colleges, Universities, and/or C29Vocational Schools.
Crisis Services	Crisis Assessment Crisis Intervention Crisis Management Crisis Resolution	Los Angeles County Department of Mental Health (DMH), Covered California, and Department of Social Services (DPSS).
Child/Adult Protective Services	Needs Assessment Case Planning Information Referral	Los Angeles County Department of child and family services (DCFS).
Household Management	Training in Household Management	DCFS and DMH.
Homeownership Preparation	Homeownership Education Housing Counseling Down payment Assistance Other Homeownership Assistance	LACDA'S Home Ownership Program, East Los Angeles Community Corporation (ELACC), Clear Point Credit Counseling Solutions, Operation HOPE, and New Economics for Women (NEW).
Financial Empowerment	Financial education Financial coaching Banking services Training in money management	Los Angeles County Consumer & Busines Affairs (DCBA), East Los Angeles Community Corporation (ELACC), Clear Point Credit Counseling Solutions, Operation HOPE, New Economics for Women (NEW).
Legal Services	Legal Services	DCFS, Housing Rights Center, and DCBA.
Debt Resolution & Credit Repair	Assistance in negotiating the resolution of past-due debt	East Los Angeles Community Corporation (ELACC), Clear Point Credit Counseling Solutions, Operation HOPE, and New Economics for Women (NEW).

The LADCDA’s FSS Coordinators will aim to provide resources to service providers near the location of the FSS family; therefore, it’s important to note that the partners is not limited to the agencies listed in the table above.

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

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 LACDA 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 LACDA'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 LACDA's 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 LACDA 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 LACDA 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 LACDA, 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 re-examination 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 LACDA 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 LACDA, 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 LACDA.

Discretionary Policy: Termination of employment for nonperformance or resignation is not justification for a contract extension.

- (iii) Any other circumstances that the LACDA determines warrants an extension, including government declared disaster.

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 LACDA will accept the following form of verification for completion of the ITSP goals.

The LACDA will require third-party verification to document completion of ITSP goals. Should the third-party verification not be available, a self-certification may be acceptable.

F. Modification

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

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

- i. When the modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency.
- ii. 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 LACDA, designate another family member to be the FSS head of family.
- iii. 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 LACDA will not allow modifications if the CoP is within 150 days from the end of the term.

G. Consequences of noncompliance with the contract

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

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

A. Involuntary Termination

The LACDA 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 LACDA 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 fifteen (15) calendar days of a written request by the FSS Program to set up 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 LACDA 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 LACDA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- iii. An FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR §982.353) for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

D. Grievance Procedures

All requests for an informal hearing must be received by the LACDA within fifteen (15) calendar days of the date of the FSS End of Participation letter. If an informal hearing is requested by the FSS family, the informal hearing will be conducted within 30 calendar days from the date the request is received.

The informal review will not be conducted by the person who made or approved the decision under review, nor a subordinate of such person. The review may be conducted by:

- A staff person who is not the person who made the decision or his/her subordinate, or
- An individual from outside the LACDA.

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

A Notice of the Review decision will be provided to the participant within 30 calendar days after the review. It shall include the decision of the review officer, and an explanation of the reasons for the decision.

All requests for a review, supporting documentation, and a copy of the final decision will be retained in the applicant's file.

Requests for accommodations from persons with disabilities will be granted upon verification that the request is reasonable, and meet the need presented by the disability on a case-by-case basis.

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 LACDA's decision of whether to admit the family into its housing programs (see Section III.(III.A). - Family Demographic). 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 LACDA will ensure that the voluntary nature of FSS Program participation is clearly stated in all FSS outreach and recruitment efforts.

XII. Timetable

The LACDA implemented its FSS Program since HUD inception (est. 1998) and will continue administering and operating it per this FSS Action Plan.

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

A. Requests for Reasonable Accommodations

A person with disabilities may request reasonable accommodations to ensure access to 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 rendered decision, the family may submit a rebuttal in writing to the 504 Coordinator in accordance with the LACDA's reasonable accommodations policy. The policy and forms are available online at

<https://www.lacda.org/section-8/shared-info/accommodations>.

B. 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 rendered decision, the family may submit a request in writing to the 504 Coordinator in accordance with the LACDA's effective communications policy. The policy is available online at

<https://www.lacda.org/section-8/shared-info/accommodations>.

C. Limited English Proficiency (LEP)

The LACDA 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://welcomehome.lacda.org/whattoknow.html>.

XIV. Coordination of Services

A. Certification of Coordination

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

B. Program Coordinating Committee

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

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

1. One or more FSS Program Coordinators
2. One or more participants from each HUD rental assistance program served by the FSS program.
3. Representatives from a variety of agencies and individuals, which include but are not limited to the following: WorkSource, America's Job Center of California (AJCC), Department of Public Social Services, Los Angeles County Department of Consumer and Business Affairs, and LACDA's Home Ownership Program.

XV. FSS Portability Available Under the Housing Choice Voucher Program Only

A. Portability in initial 12 months

FSS participants may not exercise portability within the initial 12 months after signing a CoP.

B. Moves into the LACDA's jurisdiction

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

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

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 LACDA 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, LACDA 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. 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 - A written assertion based on supporting evidence, provided by the FSS family or the LACDA, as may be required under this part, and which:

- (1) Shall be maintained by the LACDA 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 LACDA, and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or the LACDA, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

Contract of Participation (CoP) - A contract, in a form with contents approved by HUD, entered into between an FSS family and a LACDA 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 LACDA 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 - 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 **[organization]**.

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 LACDA 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 LACDA; 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 LACDA 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 LACDA 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 - Means those appropriate services that a LACDA will coordinate on behalf of an FSS family under a CoP, which may include, but are not limited to:

- (1) *Childcare*—childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- (2) *Transportation*—transportation necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment;
- (3) *Education*—remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;
- (4) *Employment Supports*—job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;
- (5) *Personal welfare*—substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services;
- (6) *Household management*—training in household management;

- (7) *Homeownership and housing counseling*— homeownership education and assistance and housing counseling;
- (8) *Financial Empowerment*—training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing and improving credit scores, etc.;
- (9) *Other services*—any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD’s legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act.

Welfare assistance - Means (for purposes of the FSS Program only) income assistance from Federal, (i.e. Temporary Assistance for Needy Families (TANF) or subsequent program) State, or local welfare programs and includes only cash maintenance payments designed to meet a family’s ongoing basic needs. Welfare assistance does not include:

- (1) Nonrecurrent, short-term benefits that:
 - (i) Are designed to deal with a specific crisis or episode of need;
 - (ii) Are not intended to meet recurrent or ongoing needs; and,
 - (iii) Will not extend beyond four months.
- (2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- (3) Supportive services such as childcare and transportation provided to families who are employed;
- (4) Refundable earned income tax credits;
- (5) Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF);
- (6) Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;
- (7) Amounts solely directed to meeting housing expenses;
- (8) Amounts for health care;
- (9) Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;
- (10) Supplemental Security Income, Social Security Disability Income, or Social Security; and

- (11) Child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child's need and not on the need of the child's current non-parental caretaker.