

# Family Self-Sufficiency (FSS) Program Action Plan

---

The Los Angeles County Development Authority

REVISED AND UPDATED  
August 1, 2020



# Contents

<b>I.</b>	<b>PURPOSE OF THE PROGRAM</b> .....	<b>1</b>
<b>II.</b>	<b>OBJECTIVE</b> .....	<b>1</b>
<b>III.</b>	<b>FAMILY PROFILE</b> .....	<b>2</b>
A.	Demographics .....	2
B.	Families Expected to Participate .....	4
<b>IV.</b>	<b>OUTREACH AND RECRUITMENT</b> .....	<b>4</b>
<b>V.</b>	<b>FSS FAMILY SELECTION PROCEDURES</b> .....	<b>4</b>
A.	Fair Housing and Equal Opportunity .....	5
B.	General Application Process .....	5
C.	Denial of Participation .....	5
D.	Waiting List.....	5
E.	Incentive Plan.....	6
<b>VI.</b>	<b>ACTIVITIES AND REFERRAL SERVICES</b> .....	<b>6</b>
A.	Individual and Training Services Plan (ITSP) .....	6
B.	Program Coordinating Committee (PCC) .....	7
<b>VII.</b>	<b>FSS PROGRAM CONTRACT OF PARTICIPATION (COP)</b> .....	<b>7</b>
A.	Family Responsibilities.....	7
B.	Contract Extensions .....	7
<b>VIII.</b>	<b>SUCCESSFUL FSS PROGRAM COMPLETION OR GRADUATION</b> .....	<b>8</b>
A.	FSS Program Completion .....	8
B.	FSS Program Graduation.....	8
C.	Transitional Supportive Service Assistance .....	9
<b>IX.</b>	<b>FSS ESCROW SAVINGS ACCOUNT</b> .....	<b>9</b>
A.	Escrow Disbursements .....	9
B.	Interim Escrow Disbursements [24 CFR §984.305(c)(2)]: .....	10
C.	Forfeiture of the FSS Escrow Account .....	10
<b>X.</b>	<b>Portability</b> .....	<b>10</b>
A.	Incoming Portability .....	10
B.	Outgoing Portability .....	11
<b>XI.</b>	<b>FSS PROGRAM TERMINATION</b> .....	<b>11</b>
A.	Assurance of Non-Interference .....	12
<b>XII.</b>	<b>TIMETABLE FOR FSS PROGRAM IMPLEMENTATION</b> .....	<b>12</b>
<b>XIII.</b>	<b>CERTIFICATION OF COORDINATION</b> .....	<b>12</b>
<b>XIV.</b>	<b>DEFINITIONS OF TERMINOLOGY</b> .....	<b>12</b>

## **I. PURPOSE OF THE FAMILY SELF-SUFFICIENCY PROGRAM**

The purpose of the Family Self-Sufficiency (FSS) Program is to develop and promote local strategies for coordinating available public and private resources to help both Housing Choice Voucher (HCV) and Public Housing (PH) recipients to achieve long-term economic self-sufficiency. The FSS Program's abiding ideology is - the greatest step towards long-term financial independence is with obtaining and sustaining suitable employment. This ideology is pursued by providing FSS participants with adequate training, education, employment, and supportive services. Based on the assessed skills, experience, needs, and the current employment situation of FSS participants, the FSS Program will work to achieve the following:

- Empower families to overcome barriers and economic disparities;
- Help families to attain resources, skills and education;
- Assist participants in identifying their short and long-term paths to employment;
- Promote successful job retention and upward mobility; and
- Support participants in achieving financial stability within five years.

The Los Angeles County Development Authority (LACDA) currently administers an FSS Program consisting of a mandatory HCV participant level of 481 slots, as well as a voluntary PH FSS program. Policies and procedures for both programs are the same, unless otherwise noted, and are described in the HCV Administrative Plan (AP) and Public Housing Admissions and Continued Occupancy Policy (ACOP). The majority of HCV and PH participants are encouraged to participate in the FSS Program. The Consolidated Appropriations Act of 2014, allowed for the two programs be merged into one program and administered as provided herein, in accordance with 24CFR§984.201(e).

## **II. OBJECTIVE**

The objective of the FSS Program is for low-income families to reduce their dependency on welfare assistance. This is accomplished by providing FSS families with leads to resources within the community, which may include, but are not limited to, case management, job training, educational workshops, counseling, and other types of supportive services that assist participants in achieving economic independence. The FSS Program objectives are as follows:

- Recruit HCV and PH participants for the FSS Program;
- Conduct in-depth evaluation of each participant and develop goals the family needs to achieve to obtain economic self-sufficiency.
- Provide necessary services and resources to assist families in achieving their specific target goals;
- Develop a family's Individual Training and Service Plan (ITSP) to become self-sufficient;

- Establish a best practices case management approach that identifies the needs and services for each family based on their ITSP;
- Improve the coordination of both the planning and delivery of services to FSS Program participants;
- Document the implementation of services to be used for further planning of a broader-based FSS Program;
- Establish interagency partnerships to achieve high quality comprehensive service delivery to all members of a participating family to generate long-term results; and
- Conduct assessments and evaluations of a family's participation, case management activities, and service provisions provided by supportive service providers.

### **III. FAMILY PROFILE**

#### **A. Demographics**

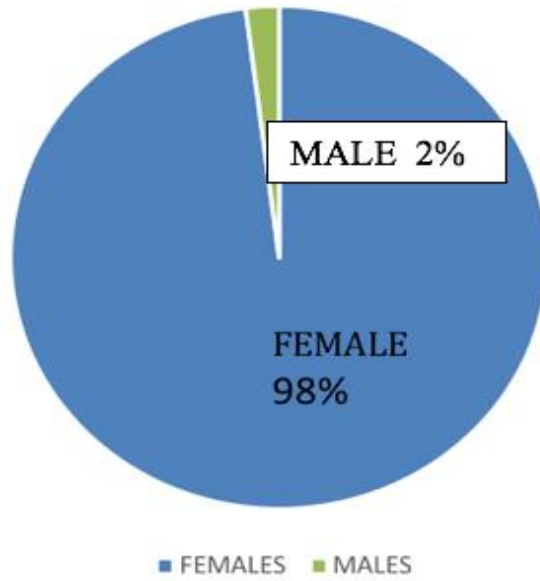
The following demographics were calculated based on a random sample of 100 families from the HCV and PH FSS program. Changes in the demographics of FSS families are expected to fluctuate overtime because of program enrollments, terminations, and completions.

#### **Employment Statistics:**

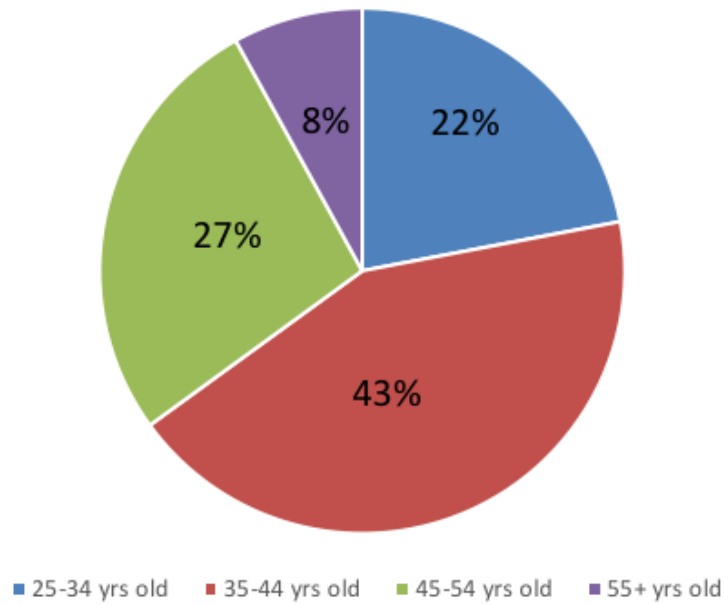
FSS Head of Household who are employed: 48 out of 100 (48%)

FSS Family's Yearly Earned Median Income: \$22,644

Participants



HoH Age Cohort



DEPENDENTS IN THE HOUSEHOLD								
Number of Dependents	0	1	2	3	4	5	6	7
Percentage of Families	10	13	30	20	10	12	4	1

## **B. Families Expected to Participate**

The LACDA's FSS Program must consist of a minimum number of HCV and PH families as required by the Department of Housing and Urban Development (HUD). HCV and PH participants alike will count towards the number of overall LACDA mandatory slots. Ongoing mandatory program size shall be reduced by one slot for each family that completes their FSS Contract of Participation (COP), per (24CFR984.105(b)(3)). All vacant FSS slots will be filled by HCV and PH participants that submit an application and qualify for program admission. Recruitment will be based on the availability of the LACDA's FSS Federally mandated slots. The LACDA does not have families participating in Operation Bootstrap or Project Self-Sufficiency.

## **IV. OUTREACH AND RECRUITMENT**

The LACDA's policies for selecting program participants are subject to the requirements described in Section 24 CFR §984.203. The LACDA will recruit potential FSS participants from families receiving rental assistance through the Family Unification Program (FUP), HCV, and PH program populations. Participants will be informed about the FSS program through a variety of methods to ensure that all participants are made aware of FSS Program opportunities. Recruitment activities will include, but are not limited to:

- FSS presentation at voucher issuance;
- LACDA publications, such as the Tenant Talk and LINK newsletters;
- Brochures;
- Referrals from other LACDA programs;
- Monthly Housing Commission meetings;
- FSS Program enrollment meetings; and
- FSS Information disseminated in the LACDA lobby

Recruitment activities will focus on explaining the benefits of participating in the LACDA's FSS program to potential participants. Interested families will be notified that FSS participation is limited to families who are receiving monthly rental subsidies from The LACDA.

## **V. FSS FAMILY SELECTION PROCEDURES**

**A. Fair Housing and Equal Opportunity**

It is the policy of the LACDA to comply fully with all Federal, State and local nondiscrimination laws including the rules and regulations governing fair housing and equal opportunity in housing and employment. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under the FSS or any LACDA assistance programs on the grounds of race, color, sex, religion, creed, national or ethnic origin, familial status, or disability; regardless of actual or perceived sexual orientation, gender identity, or marital status.

**B. General Application Process**

Subsequent to outreach and recruitment efforts (see section IV), the LACDA will invite eligible HCV and PH participants to attend an FSS enrollment appointment. At the appointment, the family will receive the requirements and benefits of participating in the FSS Program. Prospective applicants 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 or in person.

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

The LACDA will make up to three attempts to schedule an enrollment appointment in person, by phone, and/or mail.

**C. 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 public housing authority;
2. Does not respond to the three attempts made to schedule an enrollment appointment;
3. Has successfully met the terms of a previous FSS contract with the LACDA or another public housing authority and officially graduated from the FSS Program with or without an escrow savings account.

**D. Waiting List**

As required by 24CFR§984.203(b), if there is no availability to enroll eligible participants, applicants will be placed on the FSS Program's waiting list in the order of the date and time their applications was received by the LACDA. When a slot becomes available, the next eligible family will be contacted for an interview. Applicants that fail to respond, are not locatable, or are not willing to sign the FSS COP will be taken off of the waiting list. The LACDA will make three attempts to schedule an enrollment appointment.

Preferences: The LACDA's FSS Program will give preference to incoming portable families with an active FSS COP.

### **E. Incentive Plan**

As required by HUD, the LACDA will provide incentives for families who participate in the FSS Program. The two main incentives provided to FSS participants are case management services and the FSS escrow savings account. The LACDA may establish an escrow savings account for eligible FSS participants (see section IX). Through case management, FSS participants will have the opportunity to receive individualized assistance and encouragement from an LACDA FSS program specialist. Additionally, the family will have access to community employment, training and educational resources, and the flexibility to select services that will assist the family in developing the necessary skills, while securing the resources to achieve economic self-sufficiency.

## **VI. ACTIVITIES AND REFERRAL SERVICES**

The quantity and quality of supportive services received will depend on the availability of federal funding, private funding, and the resources available in the community. The supportive service needs for families participating in the FSS Program will be determined when each family's Individual and Training Services Plan (ITSP) is prepared. The head of the FSS family, and each adult member of the family who elect to participate in the FSS Program will meet with a LACDA FSS program specialist who will assess the family member's strengths and needs in order to establish goals. The LACDA FSS program specialist will then develop a plan to help each family member accomplish their goals. The FSS participant is ultimately responsible for pursuing all community resources listed in their service plan.

### **A. Individual and Training Services Plan (ITSP)**

Each Head of Household (HOH) and any adult member(s) in the family that elect to participate in the FSS Program will complete an ITSP. The plan will outline the participant's recommended resources and services, milestones, interim and final goals for suitable employment. A family's recommended supportive services may be provided by both private and public resources, and include, but are not limited to the following:

- Case Management;
- Job Fairs;
- Subsidized Child Care Providers;
- Job Search Assistance Agencies;
- Educational Centers;
- Crisis Intervention Programs;
- Transportation Assistance;
- Career Counseling;



- Homebuyer Counseling;
- Financial Counseling;
- Life skill Counseling;
- Parenting Counseling; and
- Training or Informational Workshops.

## **B. Program Coordinating Committee (PCC)**

As required by HUD, the FSS Program has established a Program Coordinating Committee (PCC). The PCC meets, at least, four times a year. The PCC is composed of representatives from the LACDA, Social Service agencies, FSS participants and other interested parties. The purpose of the PCC is to identify community resources and obtain commitments from supportive service providers and private entities in order to increase the effectiveness of the FSS Program. The PCC also provides referral services for participating families.

## **VII. FSS PROGRAM CONTRACT OF PARTICIPATION (COP)**

As required by HUD, all applicants selected for participation in the FSS program will be required to sign form HUD-52650, Family Self-Sufficiency (FSS) Program Contract of Participation (COP). The COP will be for an initial 5-year term and will include an ITSP, the Total Tenant Payment (TTP) or 30% of the family's monthly adjusted income, annual income, earned income, COP effective and expiration dates.

### **A. Family Responsibilities**

All family members must comply with the terms of the FSS Program and leases to ensure they remain in "good standing" (see the LACDA's Admin/ACOP Plans). Family responsibilities under the COP include, but are not limited to:

Head of Household must:

- Seek and maintain suitable employment throughout the term of the contract;
- Complete activities specified in the ITSP; and
- Upon request, supply the LACDA with verification of the family's participation. Verification may include evidence of employment, job interviews, training, educational attendance, and other FSS services and activities.

### **B. Contract Extensions**

A participant of the FSS Program may request an extension of their COP, if the family is unable to complete its goals within the five-year period due to circumstances beyond the family's control. Examples of circumstances are; serious illness; involuntary loss of employment; or current economic conditions [24CFR§984.303 5(d)].

Request for a contract extension must be made in writing by the head of household. The written request must include a description of the need for an extension. The LACDA will review the extension request and determine if an extension can be granted. Any approved extension request may not exceed two (2) years.

## **VIII. SUCCESSFUL FSS PROGRAM COMPLETION OR GRADUATION**

### **A. FSS Program Completion**

It is possible for a family to complete their family's participation obligations before the end of their 5-year contract term in the FSS Program. A family's entitlement to their escrow funds may occur in less than 5 years in these cases.

Once the COP has expired, a family's participation in the FSS Program is considered to be concluded when The LACDA determines one of the following has occurred:

1. The family has fulfilled all of its responsibilities under the contract; or
2. For HCV FSS participants, when thirty percent (30%) of the family's monthly-adjusted income is greater than or equal to the Fair Market Rent (FMR) amount for the unit size for which the family qualifies, based on The LACDA's occupancy standards.

**NOTE:** Public Housing participant families are excluded from the second option above, which allows for COP completion or graduation when 30% of the family's monthly-adjusted income is greater than or equal to the area's FMR.

Based on these cases, the COP will be considered completed and the family's participation in the FSS Program concluded, even though the contract term, including any extension thereof, have yet to expired, and family members who have ITSP have not completed all the activities set forth in their ITSP plans.

### **B. FSS Program Graduation**

To successfully graduate from the FSS program, the family must:

- Submit a written request for consideration for graduation;
- Demonstrate that all interim and final goals in their COP and ITSP were completed on or before the expiration date of the contract;
- Include all supporting documents, along with verification that all household members have been independent of welfare assistance for twelve (12) consecutive months; and

- Certify that the HOH has secured suitable employment.

Upon submission of a graduation request, the LACDA will review the request and determine if the family is suitable for graduation. If it is determined that the family has fulfilled all responsibilities under their COP and ITSP, the LACDA will disburse any accumulated escrow funds due to the family (minus any debts owed to the LACDA).

### **C. Transitional Supportive Service Assistance**

The LACDA may offer a former FSS family appropriate supportive services to assist in becoming self-sufficient or in remaining self-sufficient, if they have completed their COP and the family's HOH is employed. To receive this continued assistance, the family must still reside in Public Housing or HCV assisted housing [24 CFR 984.303 (j)].

## **IX. FSS ESCROW SAVINGS ACCOUNT**

Each eligible participant may establish an escrow savings account, in accordance with HUD regulations. The general concept of the FSS escrow account is for a family to pay rent in accordance with HUD required family contribution policies, but based on their household income increasing due to their increased employment income, the amount of the increase in earned income is escrowed. However, since there are other factors that affect the family's rent portion, the amount may not necessarily be a dollar-for-dollar match. The amount escrowed for the family will depend on whether the family is considered a very low-income or low-income family.

### **A. Escrow Disbursements**

To receive escrow funds, an FSS participating family must successfully complete the terms and conditions of the COP. Successful completion will be monitored and documented by the FSS coordinator assigned to each case.

Escrow funds may be disbursed when the following occurs:

- The COP has been completed and the LACDA determines the family has met their family obligations and is in good standing as defined in the AP/ACOP.
- When 30% of family's monthly adjusted income is greater than or equal to the FMR for the unit size for which the family qualifies.
- At contract completion, the head of the family must certify that no family member receives welfare assistance.

If eligible, the accrued escrow funds (minus any debts owed to the LACDA) will be disbursed to the designated head of household.

**B. Interim Escrow Disbursements [24 CFR §984.305(c)(2)]:**

The LACDA may consider requests for an interim disbursement of a portion of the FSS escrow account, provided the request is submitted in writing and meets the following requirements:

- The family must prove that the requested is needed in order to remove goal-related barriers and that the family has attempted other resources; and
- The family is currently employed and has met one additional goal outlined in their ITSP, as determined by the LACDA.

The interim disbursement request must be related to one of the following:

- Completion of higher education (i.e. college, graduate school);
- Job training expenses;
- Business start-up expenses; or
- Car when public transportation is unavailable or inaccessible to the family.

The LACDA will make a determination on a case-by-case basis for the early release of escrowed funds. Interim Escrow Disbursements must be approved by the LACDA's Director. Any interim disbursement will be deducted from the participant's escrow balance.

**C. Forfeiture of the FSS Escrow Account**

The 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;
- 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).

**X. Portability**

**A. Incoming Portability**

The LACDA may at its sole discretion absorb billable port FSS participants from another housing authority and in accordance with 24 CFR §984.306.

## **B. Outgoing Portability**

If an existing LACDA HCV FSS participant wishes to relocate prior to the initial term (12 months) of their FSS COP, the family will be terminated from the FSS program.

- **Billing**

If an FSS family relocates to another Housing Authority located within the County of Los Angeles' geographic area, the family may be eligible to remain in the LACDA's FSS program and receive continued FSS case management.

If an FSS family relocates to another Housing Authority located *outside* of the County of Los Angeles' geographic area, the family will be terminated from the LACDA's FSS Program.

- **Absorbing**

If an FSS family ports to another Housing Authority after the initial term of their FSS COP, and the receiving Housing Authority is absorbing the family, the family will have up to 1 year to transfer its FSS COP to the receiving Housing Authority, if the receiving Housing Authority is willing to enroll the family into its FSS program.

If the receiving Housing Authority does not have an FSS Program, the family will be terminated from the LACDA's FSS Program.

## **XI. FSS PROGRAM TERMINATION**

Families will be thoroughly briefed on the conditions under which the family may be terminated from the FSS Program prior to signing their COP.

The LACDA may terminate participants from the FSS Program for the following reasons:

- Termination or violation of the HCV/PH program regulations;
- The family's voluntary withdrawal from the FSS program;
- Mutual termination through consent of both the LACDA and the participating family;
- Failure of the FSS family to meet its obligations under their COP/ITSP without good cause. This includes failure of the HOH to seek and maintain suitable employment during their contract period.
- Failure of the other household members to become independent of welfare assistance for a period of one-year prior to termination of the FSS contract;
- If the family ports to another Housing Authority and is not accepted into the receiving agency's FSS program or family chooses not to participate; or

- By such other act as is deemed inconsistent with the LACDA and the FSS Program.

The LACDA will not terminate or withhold an FSS participant's housing for not satisfying the FSS COP. If a family previously did not complete their FSS COP, and wishes to enroll in the program for the second time, the family must submit an application and a written request. The written request must indicate the reason(s) why the family would like to enroll in the program for a second time. The LACDA will review the request and make a determination.

#### **A. Assurance of Non-Interference**

LACDA policies are subject to the requirements as described in Section 24CFR984.201(10) of the FSS Program. Therefore, families will be notified during the recruitment and application process that the FSS program is a voluntary program and assistance will not be withheld for non-participation or non-completion of FSS program requirements.

### **XII. TIMETABLE FOR FSS PROGRAM IMPLEMENTATION**

As stated in the Initial FSS Action plan, outreach for the implementation of the FSS program began in January of 2004, with a target date of establishment set for September 30, 2005. The LACDA will continue to incorporate any additional subsidies awarded in the future in accordance with HUD regulations.

### **XIII. CERTIFICATION OF COORDINATION**

To comply with the federal Workforce Investment Act (WIA) of 1998, which supersedes the Job Training Partnership Act, the LACDA and the FSS Program certify that they have and will continue to coordinate with WorkSource Centers and other community resource providers. Implementation of additional services and activities will continue to be coordinated on an ongoing basis.

### **XIV. DEFINITIONS OF TERMINOLOGY**

Definitions as used in this plan are outline in PART 24CFR§984.103 and Part 882 and 887 of 24 CFR.

**Welfare assistance** is defined as income assistance from Federal or State welfare programs, and includes only cash maintenance payments designed to meet a family's ongoing basic needs [24 CFR §984.103 (8)]. Types of assistance explicitly excluded from the definition of welfare are non-recurrent short-term benefits, child-care services provided to working families, such as TANF non-needy grants, Medicaid and food stamps.

**Suitable employment** is defined as employment that is either part-time or full-time, and is based on the participant's skills, education, and available job opportunities within the LACDA's jurisdiction (24CFR984.303(b)(3)(iii)).

**NOTE:** The terms FSS family and FSS participant are used interchangeably throughout this plan.