

**Lincoln Housing Authority**

**Combined**

**Public Housing**

**and**

**Housing Choice Voucher**

**Family Self-Sufficiency Program**

**Action Plan**

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APPROVAL FOR THE FSS ACTION PLAN>**

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**Attachment A FSS Direct Assistance Guidelines**

## **I. INTRODUCTION**

The Family Self-Sufficiency (FSS) Program has been operated by the Lincoln Housing Authority since 1993. This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by Lincoln Housing Authority. The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of HUD assistance with public and private resources in order to enable eligible families to make progress toward economic security. The purpose of the FSS Action Plan is to establish policies and procedures for carrying out the FSS program in a manner consistent with HUD requirements and local objectives. This FSS Action Plan describes the Lincoln Housing Authority's local polices for operation of the FSS program in the context of federal laws and regulations. The FSS program will be operated in accordance with applicable laws, regulations, notices, and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.

## II. OVERVIEW

The Family Self-Sufficiency Program is designed to support Public Housing families and Section 8 Housing Choice Voucher families in obtaining the training, education, employment, and support services necessary to increase their earned income, to become independent of federal welfare assistance, and to achieve economic self-sufficiency. Upon enrollment, participants receive guidance in identifying goals and objectives to help families toward employment and self-sufficiency. While the FSS Program encourages families to reach an earning level that makes housing assistance unnecessary, successful completion of the FSS program does not require becoming independent of housing assistance.

Families who choose to enter the FSS Program must execute a Contract of Participation which identifies the responsibilities of the participant, as well as the role of LHA and partnering service providers. The Contract includes the development of an Individual Training and Services Plan (ITSP) outlining the participant's goals and interim steps toward self-sufficiency.

Housing authorities are required by HUD to provide FSS participants with support services coordinated by the LHA staff and the staff of partner organizations. In addition, HUD requires that housing authorities establish an escrow account of behalf of eligible FSS participants. Eligibility for an escrow account deposit is determined by a HUD-approved formula, based on changes in household income. Families with escrow accounts are able to make interim and final withdrawals based on HUD regulations and agency policies as outlined in the FSS Action Plan. FSS regulations and policies are explained to participants at orientation, at the time the contract is executed, and at various times throughout their participation in the program.

### III. PROGRAM SIZE AND CHARACTERISTICS

#### A. FAMILY DEMOGRAPHICS

Families expected to participate in the Public Housing or Housing Choice Voucher FSS program will be those who are financially disadvantaged, have a lack of education and/or job skills, and those with primarily female heads of households.

The following is a data snapshot from July 7, 2022, for the current public housing and housing choice voucher participants.

	Public Housing	Housing Choice Voucher
<b>Head of Household</b>		
Male Head of Household	30	1057
Female Head of Household	166	1829
<b>Family Composition</b>		
Single Persons	21	1480
Families with Children	175	1406
<b>Race</b>		
White	68%	76%
Black	24%	16%
American Indian/Native Alaskan	1.5%	2%
Asian/Pacific Islander	.5%	3%
Native Hawaiian/Other Pacific Islander	1%	.3%
Other	5%	3%
<b>Ethnicity</b>		
Hispanic	11%	5%
Non-Hispanic	89%	95%

<b>Age of Household Members</b>		
Age 0 to 20	436	3245
Age 21 to 30	54	459
Age 31 to 40	83	794
Age 41 to 50	59	631
Age 51 to 60	26	543
Age 61 and over	17	1094
<b>Unit Statistics</b>		
0 Bedroom	0	90
1 Bedroom	0	1055
2 Bedroom	45	919
3 Bedroom	119	553
4 Bedroom	27	243
5 Bedroom	5	25
6 Bedroom	0	1

## **B. Supportive Service Needs**

LHA expects these families to need supportive services such as housing placement and assistance, home ownership preparation, counseling, and employment opportunities by assisting in job development, on-the-job training, training in basic skills and executive function (including household management), job placement assistance, GED preparation, higher education guidance and support, English as a Second Language, assistance accessing and paying for child care, transportation assistance, financial coaching, including assistance with budgeting, banking, credit, debt, and savings, and access to resources for health services including counseling or treatment for substance abuse and mental health. In marketing the program, emphasis will be given to participation in education or training as an important step in moving toward self-sufficiency.

## **C. Estimate of Participating Families**

In recent years, Lincoln Housing Authority has been funded for 2 coordinators. The minimum number of participants required to be served based on this funding is 75.

**Public Housing Program:**

Eligible families will be those including two or more family members and single individuals. Of the current client list, 89% represent families and 11% are single. There are currently 200 public housing units.

**Section 8 Housing Choice Voucher Program:**

Eligible families will be those including two or more family members and single individuals. There are currently 2,886 vouchers shown in the family demographic data in Section 1. There are additional special purpose vouchers: VASH (162 vouchers), Mainstream (147 vouchers) and Emergency Housing Vouchers (100 vouchers). These households are also eligible to participate in the FSS program.

Lincoln Housing Authority expects to maintain an average enrollment of 85 to 100 FSS families at any one time. With turnover, Lincoln Housing Authority expects to serve 120 families per year.

**D. Eligible Families from Other Self-Sufficiency Programs**

At the beginning of the FSS program in 1993, Lincoln Housing Authority transferred all participants from Operation Bootstrap and Project Self-Sufficiency to the Family Self-Sufficiency program. No other transfers from other self-sufficiency programs were expected since there were no other self-sufficiency programs for individuals or families in the Section 8 program at the time the FSS program was started. Currently Lincoln Housing Authority receives Emergency Housing Vouchers (EHV), Mainstream and Veterans Affairs Supportive Housing (VASH) vouchers and expects to enroll families from these programs into the FSS program.

For public housing, no transfers from other Lincoln Housing Authority self-sufficiency programs were completed since there were no self-sufficiency programs for individuals or families in public housing at the time the FSS program was started.

Lincoln Housing Authority is willing to enter into agreements with other agencies that have self-sufficiency programs. Through these agreements, agencies will offer the FSS contract as an additional option for their participants provided the family is an eligible FSS candidate. The interagency agreement will identify the roles and responsibilities of each party with respect to the FSS program to ensure that HUD requirements are met.

**Program Transfers**

HUD rules for the FSS program do not address program transfers from the public housing program to the housing choice voucher program or from the housing choice voucher program to the public housing program. HUD allows a transfer with the following requirements:

- The original terms of the contract will not change, i.e., the start and end date of the contract and the baseline total income, earned income and total tenant payment. Calculations of escrow will be based on these original terms.
- A contract amendment will be completed to show the change in program.



**Portability**

LHA allows the transfer of FSS contracts of families in good standing from other PHAs. The original terms of the contract will not change, i.e., the start and end date of the contract and the baseline total income, earned income and total tenant payment. Calculations of escrow will be based on these original terms.

## **IV. FSS FAMILY SELECTION PROCEDURES**

LHA has an overall enrollment goal of 100 families per year in the program. To the extent that LHA can work with other agencies to provide supportive services in a way that ensures the integrity of the program and compliance with rules and regulations, LHA will exceed the enrollment goal of 100 families and will not set a specific limit on enrollment. LHA intends to exceed these minimum enrollment levels.

### **Public Housing**

Lincoln Housing Authority was initially required to have a minimum program enrollment of 39 families. As of March 1, 2004, LHA fully met the requirement for a minimum program enrollment of 39 families by achieving the equivalent number of FSS program graduates. See program regulations for 10/1/98.

### **Housing Choice Voucher (Section 8) Program**

Lincoln Housing Authority was initially required to have a minimum program enrollment of 33 families. Eligible families for FSS are current participants in the housing choice voucher program. As of March 1, 2004, Lincoln Housing Authority fulfilled the requirements for a minimum program enrollment of 33 families by achieving the equivalent number of FSS program graduates. See program regulations for 10/1/98.

For both public housing and housing choice vouchers, the program size is determined as a function of the Action Plan and the HUD grants for funding the FSS Coordinator positions. (See above)

The selection process for Public Housing FSS or Section 8 FSS is non-discriminatory in nature and the following procedures will ensure that the selection of families will be made without regard to race, color, religion, sex, handicap, familial status, or national origin.

The Lincoln Housing Authority will not discriminate against qualified persons because of their disabilities. To assist in the application process or FSS program participation, reasonable accommodations will be made for individuals with mobility, manual, sensory, speech impairments, mental or developmental disabilities. The Lincoln Housing Authority will make reasonable accommodations to a person's disability to allow participation in the FSS program. However, LHA may decide that an accommodation is not reasonable if it causes undue financial and administrative burdens.

The Family Self-Sufficiency program will comply with the housing authority's Limited English Proficiency Plan to ensure that persons with limited English proficiency have meaningful access to participate in the programs and services provided in the FSS program.

Lincoln Housing Authority will not deny participation in the FSS program based on whether the family is likely or unlikely to become self-sufficient in five years.

### **Initial Notification--Public Housing**

All Public Housing residents receive a brochure on the FSS program during their move-in process. Brochures are also mailed within 60 days after moving into public housing. Lincoln Housing Authority continues to inform Public Housing families about the FSS Program through a quarterly tenant newsletter. Families who participate in the Community Service and Economic Self-Sufficiency Program are also often given information about the FSS program. Individuals can declare their interest in the FSS program by completing a questionnaire form on the LHA website or by submitting a completed brochure questionnaire.

### **Initial Notification--Housing Choice Voucher**

Section 8 Housing Choice Voucher participants are notified about the FSS program through briefings, a quarterly tenant newsletter, brochures, and post-cards. Individuals can declare their interest in the FSS program by completing a questionnaire form on the LHA website or by submitting a completed brochure questionnaire.

### **Selection Preference**

#### **FSS Families Relocating to Lincoln**

LHA will give an enrollment preference to an FSS family relocating to Lincoln from another housing authority. The family must be in good standing and participated in the initial housing authority's FSS program for at least one full year. HUD defines good standing as an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the PHA; and is in compliance with the regulations regarding participation in the relevant rental assistance program, including rent payments. The FSS contract at LHA will be effective within 120 days of their initial lease up under the voucher or public housing program. HUD requires the expiration date of the contract with LHA must be the same as the expiration date of the contract with the initial housing authority and LHA must use the same amounts listed for annual income, earned income, and family rent (TTP) on the original Contract of Participation between the initial housing authority and the family. The initial housing authority must also transfer the family's FSS escrow account balance in conjunction with their lease up and FSS enrollment. In the case of a voucher, the voucher must be absorbed by LHA. The initial housing authority must also determine that the family left their FSS program in good standing. No relocating family will be enrolled in the FSS program with a preference if more than six months has elapsed from the termination date of their housing at the initial housing authority to the proposed effective date of the FSS contract of participation at LHA.

In those cases where the relocating family does not enroll with a preference, they will be eligible to be placed on the waiting list, if applicable, and enroll in FSS through regular enrollment.

### **FSS Waiting List Procedures**

A waiting list of current Public Housing families and a separate waiting list of Housing Choice Voucher families interested in FSS will be maintained by the Lincoln Housing Authority. An applicant's FSS contract must be effective within six (6) months of the referral date or their name will be removed from the waiting list or placed at the bottom of the waiting list. For applicants removed from the waiting list, should they later be interested again, a new date and time for declaring interest will be established for purposes of positioning them on the FSS waiting list. One FSS coordinator will be assigned to the Public Housing FSS waiting list. The assigned

Public Housing FSS coordinator will also enroll Section 8 participants if there is not further remaining applicants on the Public Housing waiting list.

### **Selection for or Denial of Participation**

Lincoln Housing Authority will deny FSS participation to a family if the family owes the LHA money in connection with Public Housing or the Housing Choice Voucher Program, unless the participant has engaged in and is current on an approved payment plan.

Lincoln Housing Authority will deny participation to past graduates of the FSS program through Lincoln Housing Authority or another housing authority. LHA, at its discretion, may approve participation in the FSS program a second time for participants who withdrew voluntarily. Participants will need to complete a six-month waiting period with the understanding that:

1. The family signs a new COP, ITSP, and other enrollment paperwork.
2. The family is not eligible to receive funds accrued in escrow up to the point of their initial withdrawal from FSS.
3. The family will be eligible to receive future deposits into a new escrow account upon the FSS program.

LHA may waive the requirement for a six-month waiting period due to good cause reasons or other mitigating factors.

LHA, at its discretion, may approve participation in the FSS program a second time for participants who were terminated from the program. Participants will need to complete a twelve-month waiting period with the understanding that:

1. The family signs a new COP, ITSP, and other enrollment paperwork.
2. The family is not eligible to receive funds accrued in escrow up to the point of their initial withdrawal from FSS.
3. The family will be eligible to receive future deposits into a new escrow account upon the FSS program.
4. The family will identify barriers of previous enrollment and plans to overcome those barriers.
5. The family may be asked to complete items prior to enrollment to overcome those previous barriers.

### **Head of FSS Family**

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

Lincoln Housing Authority will deny FSS participation to a family in the FSS program if the family is unable or unwilling to meet the minimum expectations for continuing participation.

Minimum expectations are presented at enrollment.

If a service is not available which is key to the family's needs, the Tenant Services Manager may decide, after consulting with the family, that it is necessary to offer the FSS slot to the next family for which there are available services. If a missing service or group of services is consistently needed by applicants, LHA will try to locate resources to deliver the missing service.

After a family has declared an interest in FSS, the Lincoln Housing Authority will maintain that family's name, date, and time of declaration of interest, and other relevant information on a FSS waiting list. When a slot is open for enrollment in FSS, a referral date is recorded on the waiting list and the Housing Authority will send a letter to the family to complete an application form as the first step in the pre-enrollment process.

The following steps will be required of all families. The FSS Coordinator will mail an eligibility letter and FSS application form to the family. The family will be given a 30-day time frame to return the completed application. If no application is submitted within 30 days, the family's name is removed from the waiting list.

If the family submits a completed application within the 30-day time frame, the FSS Coordinator will provide an orientation to give a detailed explanation of the requirements and expectations and benefits of the program. The FSS Coordinator will also conduct an interview to determine the history and needs of the family. In some cases, the family may be required to participate in other assessments as determined by LHA. There will also be individual appointments with the FSS Coordinator to complete an Individual Training and Services Plan and Contract of Participation and the contract must be effective within 6 months of the referral date, or the family loses eligibility to enroll. As part of the pre-enrollment process, a Head of FSS Family may be required to perform related tasks such as collecting more information, making contacts with service providers, or completing application for training or educational programs. Example: if a Head of FSS Family has goals which include attending school, it may be necessary for the Head of FSS Family to get some additional information on admission criteria or program requirements before making the decision to include this as a goal.

Participation in and completion of the steps listed above are required and must be completed within reasonable time frames. If the Head of FSS Family does not complete the steps, they will be considered non-responsive and will be removed from the waiting list. It will be an indication that the family is not willing to undertake the obligations imposed by the FSS contract of participation. Failure of the family to complete the steps will result in the family not being selected to participate in the FSS program. Should they later be interested again, a new date and time for declaring interest will be established for purposes of positioning them on the FSS waiting list.

All of the pre-enrollment tasks will be readily accomplishable by the family based on the family members' educational levels and any disabilities. Reasonable accommodations will be made for individuals with disabilities. The following motivational screening factors will not be used: educational level, educational or standardized motivational test results, previous job history or

job performance, credit rating, marital status, number of children, sensory or manual skills, and discriminatory factors.

## **V. OUTREACH EFFORTS**

Outreach efforts will be made in the following ways:

All Public Housing residents and Section 8 voucher families are informed of the program and have the opportunity to declare their interest in the program and be considered for the program based on date and time of declared interest or date housed, whichever is later. Information is provided verbally and with a brochure at public housing move-ins and voucher briefings. Individuals who have been issued a voucher but have yet to be housed will also be sent a recruitment post-card. All families also receive quarterly newsletters which includes information about the FSS program. Individuals can declare their interest in the FSS program by completing a questionnaire form on the LHA website or by submitting a completed brochure questionnaire.

Families can be added to the waiting list by completing the personal information section of the FSS brochure and returning it to the housing authority's main office. Families are added to the waiting list based on date and time of LHA's receipt of the personal information section of the brochure.

Outreach efforts will be targeted equally to all families. Materials in commonly spoken languages other than English and/or interpretation services will be provided 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 Lincoln Housing Authority will account for the needs of persons 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. LHA will use direct mail, referrals by other staff or participants, and other means and media to promote and recruit participants to the program.

## **VI. FSS ESCROW ACCOUNT AND OTHER INCENTIVES TO ENCOURAGE PARTICIPATION**

### **Earning Escrow**

Achievement of family self-sufficiency through the FSS program is the primary incentive for participation. In addition, the FSS program provides for the establishment of an escrow account as an incentive and reward for FSS program completion. Escrow accounts will be established based on eligibility of each participating family in the FSS Program.

The amount of the monthly escrow credit is based on increases in the family's total tenant payment resulting from increases in the family's earned income during the term of the FSS contract. FSS escrow credits will be computed from earned income reported by the family at annual and interim re-exams. Whenever an annual or interim re-exam is conducted, LHA will re-compute the monthly escrow credit.

When a family enters into an FSS contract, Lincoln Housing Authority will establish baseline income data. The amount of family rent (total tenant payment or tenant rent plus utilities/utility allowance) at the start of the FSS program will be calculated and used in computing the credit.

The FSS credit will use a modified version of the HUD escrow credit worksheet. Modifications are explained below.

Under its MTW authority (effective with new housing admissions beginning 2-1-08 and annual reviews beginning 7-1-08), LHA uses 27% of gross income to determine the total tenant payment. This is the equivalent of a standard deduction of 10% for all families. The escrow credit worksheet is modified to reflect a 27% growth in monthly earned income, under calculation of FSS escrow, as that is the percentage of adjusted income used to determine the TTP.

The (account for monthly deposits) funds will be held in a single depository escrow account and invested in HUD approved investments. The total of the combined FSS account funds will be supported in the LHA accounting records by a subsidiary ledger showing the escrow balance applicable to each family. Interest income will be posted at least annually to each family's account.

An annual report on the status of the escrow account will include the balance of the FSS account at the beginning and end of the reporting period, the amount of the family's rent that was credited to the FSS account during the reporting period, any disbursements made to or on behalf of the participant, any deductions for amounts due the LHA, and the amount of interest earned during the reporting period.

The FSS Coordinators will prepare and mail the annual reports to families in January of each year and FSS families may request a report at any time.

### **Disbursement of funds in the escrow account**



When families have fulfilled all obligations under their FSS contracts and certify they are not receiving any Welfare assistance, and after proper verification by the Lincoln Housing Authority, the escrow accounts will be calculated, any family debt owing will be deducted and any interest accrued will be added. Escrow can be disbursed to the family rather than forfeited, if an FSS family in good standing moves outside the jurisdiction of the PHA 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, or if the Head of the FSS Family became disabled and unable to work during the period of the contract. Note that an interim goal of each plan is that each family that is a recipient of welfare assistance must become independent from welfare assistance on the day of graduation. Welfare assistance does not include nonrecurring, short-term benefits that are designed to deal with a specific crisis, are not intended to meet ongoing needs, and will not extend beyond four months.

A check will be issued to the family Head of FSS Family within 60 days of completion of the FSS program and receipt of family certification and verification.

If a family is ready to complete the FSS program but is under investigation for fraudulent activities by Lincoln Housing Authority, the escrow check will be held for 60 days or until resolution of the investigation, whichever occurs first. If an FSS participant is found guilty of committing fraud while participating in the FSS program, they will be terminated from the FSS program and any funds in the escrow account will be forfeited.

#### **Changes in Head of FSS Family**

If the head of the FSS family ceases to reside with other family members in the public housing or voucher unit, the remaining members of the FSS family, after consultation with the Lincoln Housing Authority, shall have the right to designate another family member as Head of FSS Family and the family will need to amend the contract of participation to designate this person as the new head of the FSS family. A new or amended Individual Training and Services Plan may also be required.

If the Head of FSS family dies and the remaining members of the family choose not to continue participating in the program and the family's obligations under the contract of participation have not been met, the escrow funds will be forfeited.

#### **Interim Disbursement of escrow funds**

At the sole discretion of the Lincoln Housing Authority, the LHA may advance to the FSS family a portion of the escrow account prior to completion of the contract. LHA has established written guidelines for use of escrow funds to meet goals of the Individual Training and Services Plan. (Attachment A)

If the family later drops out of the FSS program without meeting the contract of participation obligations, the advance payment of escrow funds will not be owed to Lincoln Housing Authority unless there was fraud or misinformation by the family.

### **Forfeiture of FSS account funds**

Amounts in the FSS account shall be forfeited upon occurrence of the following:

- (1) the contract of participation is automatically terminated if the family is evicted from housing or the family's housing choice voucher assistance is terminated in accordance with HUD requirements.
  
- (2) the contract of participation is terminated for:
  - a) unavailability of supportive services;
  - b) mutual consent of the parties;
  - c) failure of the FSS family to meet its obligations under the contract of participation;
  - d) the family's withdrawal from the FSS program;
  - e) such other act as is deemed inconsistent with the purpose of the FSS program;or  
f) by operation of law contract.
  
- OR (3) the contract of participation is completed but the FSS family is receiving welfare assistance at the time of expiration of the term of the contract of participation.
  
- OR (4) the Head of FSS family dies and the remaining members of the family choose not to continue participating in the program and the family's contract of participation obligations have not been met.

Failure of a family to report all income is committing fraud and is grounds for termination from the FSS program. The LHA has the right to evict the family from public housing and/or terminate the family from the FSS program. If the family pays back rent and LHA does not evict or terminate from FSS program, it will not credit the escrow account with any additional credits from the back rent.

Escrow funds, including interest on the funds while in the escrow account, are not considered income for purposes of income taxes. The U.S. Internal Revenue Service (IRS) has confirmed to HUD that an FSS family will have no income tax liability for funds held in the escrow account or for escrow payments made at the completion of the contract. The HA does not submit an IRS form 1099 for any FSS accounts.

FSS escrow funds forfeited by the FSS family must be used by LHA for the benefit of the FSS participant.

Specifically, such funds may be used for the following eligible activities:

- (A) Support for FSS participants in good standing, including, but not limited to, transportation, child care, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP;
- (B) Training for FSS Program Coordinator(s); or
- (C) Other eligible activities as determined by the Secretary.

Such funds may not be used for salary and fringe benefits of FSS Program Coordinators; general administrative costs of the FSS program, for housing assistance payments (HAP) expenses or public housing operating funds; or any other activity determined ineligible by the Secretary.

### **Additional FSS Participation Incentives**

LHA employs two FSS Coordinators to assist the families with enrollment, goal planning, coaching and support, and assistance with referrals for services. The coordinators will provide referrals to other organizations for support services that help remove barriers toward achievement of self-sufficiency.

LHA budgets non-federal funds, obtains local grants and will use forfeited FSS escrow funds (if any) to financially assist families to achieve the goals of their ITSPs. FSS funds are Lincoln Housing Authority private resources set aside for FSS participant families. These FSS funds may be available to FSS families, in good standing, for special unmet needs such as car repairs, subsidized childcare, special workshops or seminars, tuition and books, public transportation, counseling, emergency situations, etc. A process has been established for reviewing each request by the FSS participants. The decision to request funds is made by the FSS Coordinator and approved or denied by Tenant Services Manager in accordance with board-approved guidelines. (Attachment A)

Included in the guidelines for use of FSS funds is a requirement for families to use FSS escrow funds instead of FSS funds if their escrow balance exceeds a specified balance. These changes do not require families to use escrow, but they will not receive FSS funds if escrow funds are available. Families are asked to sign a special request form that serves as a general agreement to access the escrow funds.

LHA also has a discretionary fund program which may be available to any LHA families for special unmet needs in accordance with agency guidelines. Discretionary funds are also Lincoln Housing Authority private resources set aside for emergency and urgent need situations. Families who are approved for these discretionary funds must sign an agreement to repay the fund. No interest or penalties apply. FSS participants can request use of the discretionary funds through their housing specialist. Requests are approved or denied by the Tenant-Based Housing Manager in accordance with board-approved guidelines.

## **VII. FSS ACTIVITIES AND SUPPORTIVE SERVICES**

Lincoln Housing Authority certifies that the development of the services and activities scheduled to be provided under the FSS program has been coordinated with public and private providers, including self-sufficiency programs of the Departments of Labor and Health and Human Services, and other employment, childcare, transportation, training, and education programs. And, that implementation will continue to be coordinated with these local public and private providers to avoid duplication of services.

LHA expects families to need activities and supportive services such as assessments, childcare, transportation, education, home ownership preparation, counseling, skills training, job search assistance and financial empowerment. Activities and supportive services will be provided by both public and private resources, historically these services have been provided by: Southeast Community College, Vocation Rehabilitation, University of Nebraska, Wesleyan College, Doane College, in home and center licensed childcare providers, local mechanics, StarTran bus services, NeighborWorks, US Bank, Community Action Program, American Job Center, Assistive Technology Partnership, Matt Talbot Kitchen and Outreach, Center for People in Need, Good Neighbor Center, Asian Center, Bryan Health, and Lincoln Literacy. The FSS Coordinator will work to obtain the necessary supports and services to families with the input of the Program Coordinating Committee (PCC).

## **VIII. METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS AND DELIVERING APPROPRIATE SUPPORT SERVICES**

To help determine the supportive service 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 and Service Plan (ITSP) and signing 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. The formal assessments may lead to adjustments to the ITSP, if requested by the family.

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 towards their goals.
- Access services available in the community through referrals to appropriate service providers.
- Overcome obstacles in the way of achieving a family's goals.

## IX. CONTRACT OF PARTICIPATION

Each family that is selected to participate in the FSS program must enter into a contract of participation with Lincoln Housing Authority. The contract is signed by the Head of the FSS family. The contract of participation incorporates the Individual Training and Service Plan. It is in the form prescribed by HUD and sets forth the terms and conditions governing participation in the FSS program, including the rights and responsibilities of the FSS family and of the Lincoln Housing Authority, the services to be provided to and the activities to be completed by the head of the FSS family and each adult member of the family who elects to participate in the program.

### **Interim and Final Goals**

The Individual Training and Services Plan will establish specific interim and final goals by which the Lincoln Housing Authority and the family will measure the family's progress toward fulfilling its obligations under the contract of participation, and toward becoming self-sufficient.

The following goals will be required of all participating FSS families:

- Each participating family that is a recipient of welfare assistance must establish an interim goal of that every member of the family become independent from welfare assistance at successful completion of the FSS program.
- Each contract of participation shall provide that one of the obligations of the FSS family is to comply with the terms and conditions of the housing lease.
- The head of the FSS family shall be required to seek and maintain suitable employment during the term of the contract and any extension thereof. Seeking employment means the head of the FSS family has applied for employment by completing job applications, going to job interviews, and following up on employment opportunities.

Suitable employment: A determination of suitable employment shall be made by Lincoln Housing Authority, with the agreement of the affected participant, based on the skills, education, job training, and receipt of other benefits of the household member, and based on the available job opportunities within the jurisdiction served by Lincoln Housing Authority.

Participants will be encouraged to pursue employment which is verifiable for a minimum of 32 hours per week for 10 weeks over a 12-week period. AmeriCorp VISTA and Experience Works does not meet the requirements for suitable employment.

Reasonable accommodation for Persons with Disabilities—requests for a reasonable accommodation to the above criteria must be submitted in writing prior to program completion. The request must be supported by a

written statement from the individual's medical provider or other appropriate professional as to a specific number of hours that the individual is able to work per week. The FSS program will consider the number of hours specified in the statement when determining the hours required for the participant to be "suitably" employed.

Determination of suitable self-employment will be based on the skills, education, and job training of the individual that has been designated head of the FSS family and based on the available job opportunities within the Lancaster County area. The participants net income, must be equal to or greater than 32 hours per week at minimum wage.

In addition to the above criteria, suitable employment will be determined by FSS coordinator after consulting with the family and with the approval of the Tenant Services Manager. Such determination of suitable employment will be based on the skills, education, and job training of the individual that has been designated head of the FSS family, and based on the available job opportunities within the Lancaster County area.

### **Home Ownership Preparation**

Home ownership preparation may be a primary goal coinciding with the employment goal. In this circumstance, the participant will be required to complete a home buyers preparation course through a local agency, obtain and maintain a credit score of 640 or higher, and save a minimum of \$1,000 of their own funds to purchase a home. They will also be informed of the LHA Home Ownership and Lease to Purchase Program as well as be expected to stay in compliance with their current lease obligations.

Home ownership may also be explored with FSS participants as a secondary goal. FSS Coordinator will discuss such topics as budgeting, obtaining credit report, LHA Home Ownership and Lease to Purchase Program, and refer participants to local home buyer's education agencies and credit repair agencies.

### **Contract Terms and Extensions**

The Contract of Participation (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 examination of income that follows the execution date.

HUD allows for extension of FSS contracts. Lincoln Housing Authority may extend the term of the contract for any FSS family that requests, in writing, an extension of the contract, provided that Lincoln Housing Authority finds good cause for granting the extension. The written request must include a description of the need for the extension. Good cause means circumstances beyond the control of the FSS family, as determined by LHA, such as serious illness, or involuntary loss of employment, active pursuit of a current or additional goal that will result in

furtherance of self-sufficiency during the period of the extension as determined by LHA or any other circumstances that LHA determines warrants an extension, as long as the request is reasonable and LHA is consistent in its determination as to which circumstances warrant an extension. Extension of the contract will entitle the FSS family to continue to have amounts credited to the escrow account, if applicable. No contract will be extended beyond the time limits allowed by HUD.

### **Unavailability of Supportive Services**

If a social service agency fails to deliver the supportive services pledged under an FSS family members Individual Training and Services Plan, LHA shall make a good faith effort to obtain these services from another agency. If LHA is unable to obtain the services from another agency, LHA shall determine whether another available service will achieve the same purpose. If other available services will not achieve the same purpose, LHA will determine whether the unavailable services are integral to the FSS family's advancement or progress toward self-sufficiency.

If determined not to be integral to advancement toward self-sufficiency, LHA will revise the Individual Training and Services Plan to delete these services and will modify the contract of participation to remove any obligation on the part of the FSS family to accept the unavailable services.

If determined to be integral to the FSS family's advancement toward the objectives of the contract of participation, Lincoln Housing Authority shall declare the contract of participation null and void.

### **Modification of the Individual Training and Services Plan (ITSP)**

Lincoln Housing Authority and the family may mutually agree to modify the ITSP. Either the family or coordinator may suggest modifications to the ITSP. Modifications may be made to the Individual Training and Services Plan, however, it is preferred that no modifications be permitted within three (3) months of the contract's end date.

The Contract of Participation can be modified with respect to the terms (extensions), to change the Head of FSS Family, or to correct any errors. The Lincoln Housing Authority shall have the final decision on all modifications.

### **Completion of the contract**

The contract is considered to be completed and a family's participation in the FSS program is considered concluded when the FSS family has fulfilled all of its obligations under the contract of participation, including all family members' ITSPs, on or before the expiration of the contract term, including any extension thereof. The family must provide appropriate documentation that each of the ITSP goals has been completed. Lincoln Housing Authority will require third-party verification to document completion of goals, when third-party verification is not possible, self-certification will be considered.

### **Termination of the contract**

The contract of participation may be terminated before the expiration of the term for:



- a) eviction from public housing or termination of the family's housing choice voucher assistance in accordance with HUD requirements;
- b) unavailability of supportive services;
- c) mutual consent of the parties;
- d) failure of the FSS family to meet its obligations under the contract of participation;
- e) the family's withdrawal from the FSS program;
- f) such other act as is deemed inconsistent with the purpose of the FSS program; or
- g) by operation of law.

### **Minimum Expectations for Continuing Participation**

Families who are participating in the Family Self-Sufficiency (FSS) Program must cooperate with the coordinator and comply with the terms of the self-sufficiency contract or agreement. Families must also comply with the general expectations of the program as established by HUD or the FSS Program Coordinating Committee. They must also be in compliance with the activities of the ITSP and making progress on the goals and objectives of their ITSP. Families who meet these expectations are considered to be in good standing. Failure to meet these expectations could result in a decision by the Lincoln Housing Authority to terminate the Contract of Participation for non-compliance.

Some of the basic expectations for participation are:

1. Students must maintain an enrollment of at least 6 credits on the semester system or 9 credits on the quarter system. A lesser number of hours will be considered for students who are also working part or full-time or actively seeking employment. For example, a part-time student would be expected to also be working 15 to 25 hours per week. Students are expected to provide evidence of school enrollment and provide copies of grade reports at the end of each semester or quarter.
2. For those who are job-seeking, they must be actively looking for employment with documented contacts and other evidence of job-seeking activity. If job seeking follows education, the job should be suitable to the training or education received.
3. All participants are expected to maintain and initiate contacts with coordinator on a regular basis.

Some examples in which the FSS family would be considered to not be participating at an expected level include, but are not limited to, the following:

1. Not completing assessments.
2. Not meeting the terms of the self-sufficiency contract or participating in contract revisions.
3. Not keeping appointments with the coordinator or with another agency providing services to the client.
4. Not maintaining satisfactory attendance or participation in education or training activities or dropping out of the program.

5. Voluntarily leaving a training component before its completion.
6. Not searching for a job or reporting on employment search activities.
7. Failing to appear for a job interview or follow up on a job opening when the potential job meets the appropriate work criteria.
8. Quitting employment or refusing a bona fide offer of employment without good cause.
9. Repeated failure to achieve the identified milestones of the self-sufficiency plan or its revisions; failure to show evidence of any substantive activity related to achieving self-sufficiency over a period of greater than 30 days.
10. Failure to follow medical advice.
11. Involvement in criminal activity.

In some cases, there may be good cause for non-participation in self-sufficiency activities. To continue to be an FSS family, these good cause reasons should only be temporary, i.e. less than 90 days unless otherwise specified. Non-participation will be reviewed on a case-by-case basis.

1. A person who has an illness or injury serious enough to temporarily prevent participation in employment or training.
2. A family crisis or change in family circumstances which interfere with participation.
3. Unavailability or a breakdown in transportation or childcare arrangements with no readily accessible alternative.
4. Hazardous work conditions; or the participant's mental or physical inability to do the job.
5. A person who is needed in the home on a continuous basis because of the illness or incapacity of another household member and no other appropriate member of the household is available to provide the needed care. Verification from a medical provider is required.
6. A parent or needy caretaker relative of a child under the age of 12 weeks.
7. A pregnant woman beginning with the 3<sup>rd</sup> trimester of pregnancy continuing through six weeks following the end of the pregnancy.
8. Unavailability of training or an educational class is not available for enrollment.

## **X. FSS PORTABILITY**

FSS participants should be aware that porting out to another housing authority could impact their participation in the FSS program. Participants who are considering porting out must notify their FSS coordinator prior to porting out.

HUD regulations allow agencies to terminate contracts of FSS participants who port out during the first twelve months of their FSS contract. When an FSS participant ports out during the first 12 months, LHA will terminate the FSS contract.

For FSS participants who have been in the program for 12 months or more and are porting out to another housing authority, the following will apply:

- In cases where the participant has not completed the contract and the receiving housing authority is absorbing the voucher, the participant may request enrollment in the receiving housing authority's FSS program. If enrollment is granted, the contract with LHA will be terminated. Upon authorized request, FSS participation records will be transferred to the receiving housing authority. Escrow will be transferred upon receipt of a written request from the receiving housing authority along with a copy of the new FSS contract and ITSP from the receiving housing authority. The new contract must be effective within 60 days of lease-up in the receiving jurisdiction and must have the same baseline data and expiration date as the contract with LHA.
- There may be cases where the receiving housing authority allows the relocating participant to enroll in its FSS program but does not absorb the Section 8 voucher. In such cases, it becomes unfeasible and an administrative burden for LHA to continue to monitor the FSS Contract.
- Where continued FSS participation is not possible, Lincoln Housing Authority will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii).

HUD regulations do not address the issue of FSS transfers when an FSS family moves from LHA's public housing to another housing authority's public housing or voucher program. Regulations do not address moving from LHA's voucher program to another housing authority's public housing program.

## **XI. PROGRAM TERMINATION; WITHHOLDING OF SERVICES; AND AVAILABLE GRIEVANCE PROCEDURES**

The contract of participation can be terminated, or support services withdrawn before the expiration of the contract term and any extension thereof for:

- a) eviction from public housing or termination of the family's housing choice voucher assistance in accordance with HUD requirements;
- b) unavailability of supportive services;
- c) mutual consent of the parties;
- d) failure of the FSS family to meet its obligations under the contract of participation;
- e) the family's withdrawal from the FSS program;
- f) such other act as is deemed inconsistent with the purpose of the FSS program; or
- g) by operation of law.

### **Withdrawal of Support Services**

Before support services are withdrawn, the FSS family will be issued a warning and invited to a conference with the case-manager and the Tenant Services Manager to discuss the problem. A representative of the support service may also be involved. The Tenant Services Manager will make a decision to continue, change, or withdraw any or all support services.

The Head of FSS Family is expected to make regular contact with the coordinators. The coordinators will monitor service delivery and program progress so that problems can be solved by prevention or early identification. Periodic contact will also be made with service providers as needed.

Agencies providing support services and activities retain the right to terminate specific services according to the policies & procedures of the agency. If the withdrawal of services is due to change of policy, loss of funding, or other administrative reason, the Program Coordinating Committee will be advised of the situation at their next regularly scheduled meeting.

### **Termination of Contract of Participation**

Coordinators have the responsibility to monitor FSS families to ensure that they are meeting their obligations under the contract and the minimum expectations for continuing participation, and they are actively working on the goals of the Individual Training and Services Plan(s). If the FSS Coordinator determines that a family is not meeting these criteria, they will work with the family to correct the situation. However, if the situation is not completely or substantially corrected, the FSS Coordinator will recommend termination of the contract of participation.

Before the contract of participation is terminated for failure to meet its obligations, the Tenant Services Manager will issue the FSS family a notice of impending termination. The family will have the opportunity to schedule an informal hearing with the Tenant Services Manager to discuss the failure to fulfill the contract. The FSS Coordinator will outline the reason termination is recommended and the FSS family will have the opportunity to respond. The Tenant Services Manager will make a decision to continue or terminate the contract of participation. If the contract is continued, revisions to the Individual Training and Services Plan

may be required as a condition of continuation. The Tenant Services Manager will make the final decision and will notify the FSS family, FSS Coordinator and others of the final decision.

In addition to the above, public housing tenants shall have the options available under the public housing grievance procedures.

### **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:

- Services that the Lincoln Housing Authority and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.
- The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the Lincoln Housing Authority and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- 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.

### **Ongoing Services**

Families who have completed the FSS contract may continue to receive case management support, on request, for up to six months following completion of the FSS program.

## **XII. ASSURANCE OF NON-INTERFERENCE WITH THE RIGHTS OF NON-PARTICIPATING FAMILIES**

The Lincoln Housing Authority assures that it will not interfere with the rights of non-participating families. A family's election to not participate in the FSS program will not affect the family's admission to Public Housing or the Housing Choice Voucher Program or the family's right to occupancy in accordance with their lease.

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

### **XIII. TIMETABLE FOR IMPLEMENTATION**

The Lincoln Housing Authority implemented the FSS program effective September 1, 1993 and achieved all minimum required enrollments for both the Section 8 and Public Housing FSS programs. Lincoln Housing Authority will continue to implement the FSS program per this FSS Action Plan.

#### **XIV. NON-DISCRIMINATION**

The selection process for Public Housing FSS or Section 8 FSS is non-discriminatory in nature and the following procedures will ensure that the selection of families will be made without regard to race, color, religion, sex, handicap, familial status, or national origin.

The Lincoln Housing Authority will not discriminate against qualified persons because of their disabilities. To assist in the application process or FSS program participation, reasonable accommodations will be made for individuals with mobility, manual, sensory, speech impairments, mental or developmental disabilities. The Lincoln Housing Authority will make reasonable accommodations to a person's disability to allow participation in the FSS program. However, LHA may decide that an accommodation is not reasonable if it causes undue financial and administrative burdens.

The Family Self-Sufficiency program will comply with the housing authority's Limited English Proficiency Plan to ensure that persons with limited English proficiency have meaningful access to participate in the programs and services provided in the FSS program.



## **XV. COORDINATION OF SERVICES**

### **A. Certification of Coordination**

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

### **B. Program Coordinating Committee**

The principal vehicle for ensuring ongoing coordination of services is the program coordinating committee (PCC), which has been established in accordance with FSS regulations to assist in securing commitments of public and private resources for the operation of the FSS program. Among other responsibilities, the PCC will help the FSS program to identify and build strong relationships with providers of supportive services that meet the needs of FSS participants. The PCC will also be consulted in developing program policies and procedures. The PCC will meet at least twice per year and may conduct business on an as-needed basis via email or telephone conferences. The Lincoln Housing Authority has final decision-making authority with respect to the Action Plan and membership of the PCC.

The PCC may appoint subcommittees for various reasons.

The PCC includes the following representatives:

- one representative of public housing and housing choice voucher participants
- one or more representatives of the Lincoln Housing Authority
- one or more representatives of local agencies providing self-sufficiency or supportive services

## **XVI. DEFINITION OF TERMS**

**EARNED INCOME** includes income as follows: (1) the full amount, before any deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services; (2) the net income from the operation of a business or profession; and (3) all regular pay, special pay and allowances of a member of the Armed Forces (special pay to a family member serving in the Armed Forces who is exposed to hostile fire is excluded). As part of its Moving to Work Demonstration, Lincoln Housing Authority has implemented a Minimum Earned Income Requirement (MEI) which is included as earned income.

Earned income does not include any pension or annuity, transfer payments, any cash or in-kind benefits, or funds deposited in or accrued interest on the FSS escrow account established on behalf of a participating family. Earned income does not include the income from employment of children under the age of 18 years.

**FSS FAMILY OR PARTICIPATING FAMILY** means a family that resides in public housing or a family that currently participates in the Housing Choice Voucher program, and that elects to participate in the FSS program and whose designated head of the family has signed the contract of participation.

**FSS PROGRAM COORDINATOR** means the person(s) who runs the FSS program. This may include (but 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.

**GOOD STANDING** An FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the PHA or owner; and is in compliance with the regulations regarding participation in the relevant rental assistance program, including rent payments.

**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.

**SEEKING EMPLOYMENT** means the head of the family has applied for employment by completing job applications, going to job interviews and following up on employment opportunities.

**SUITABLE EMPLOYMENT** means employment which will eventually make the family independent of welfare assistance. The coordinator and family, with the supervision and

approval of the Tenant Services Manager, determine suitable employment based on the skills, education, and job training of the individual that has been designated head of the FSS family, and based on the available job opportunities within the Lancaster County area. Where Lincoln Housing Authority has provided tuition assistance, the employment is expected to correspond with the course of study for which the assistance was provided.

**WELFARE ASSISTANCE** for purposes of the FSS program only, means income assistance from federal or state welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basis needs.

Welfare assistance does not include:

- ◆ Non-recurrent, short-term benefits that are designed to deal with a specific crisis situation or need, are not intended to meet recurrent or ongoing needs, and will not extend beyond four months.
- ◆ Work subsidies such as payments to employers or third parties to help cover the costs of employee wages, benefits, supervision and training
- ◆ Supportive services such as child care and transportation provided to families who are employed
- ◆ Refundable earned income tax credits
- ◆ Contributions to and distributions from Individual Development accounts under TANF
- ◆ Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement and other employment related services that do not provide basic income support.
- ◆ Transitional benefits provided under a Job Access or Reverse Commute project, pursuant to section 404 (k) of the Social Security Act, to an individual not otherwise receiving assistance
- ◆ Amounts solely directed to meeting housing expenses
- ◆ Amounts for health care
- ◆ Food Stamps and emergency rental and utilities assistance
- ◆ SSI, SSDI, or Social Security

## **Revision History for the FSS Program Action Plan**

<b>Original Plan (Public Housing):</b>	<b>December 21, 1993</b>
<b>Original Plan (Section 8):</b>	<b>August 5, 1994</b>
<b>Separate and Revised Plans:</b>	<b>November 16, 1994</b>
<b>Revised and Combined Plans:</b>	<b>August 12, 1996</b>
<b>Revised:</b>	<b>November 1, 1999</b>
<b>Revised:</b>	<b>May 17, 2000</b>
<b>Revised:</b>	<b>September 5, 2000</b>
<b>Revised:</b>	<b>November, 2000</b>
<b>Revised:</b>	<b>June, 2002</b>
<b>Revised:</b>	<b>December, 2002</b>
<b>Revised:</b>	<b>December, 2003</b>
<b>Revised:</b>	<b>June, 2004</b>
<b>Revised</b>	<b>June, 2005</b>
<b>Revised</b>	<b>June, 2006</b>
<b>Revised</b>	<b>April, 2007</b>
<b>Revised</b>	<b>July, 2007</b>
<b>Revised</b>	<b>January, 2008</b>
<b>Revised</b>	<b>August, 2008</b>
<b>Revised</b>	<b>July, 2009</b>
<b>Revised</b>	<b>July, 2010</b>
<b>Revised</b>	<b>July, 2011</b>
<b>Revised</b>	<b>July, 2012</b>
<b>Revised</b>	<b>April, 2013</b>
<b>Revised</b>	<b>July, 2013</b>
<b>Revised</b>	<b>July, 2014</b>
<b>Revised</b>	<b>February, 2015</b>
<b>Revised</b>	<b>June, 2016</b>
<b>Revised</b>	<b>October, 2018</b>
<b>Revised</b>	<b>April, 2020</b>
<b>Revised</b>	<b>October, 2021</b>
<b>Revised</b>	<b>September, 2022</b>
<b>Revised</b>	<b>November, 2022</b>

# FSS Direct Assistance Guidelines

December 2024

## I. FSS Assistance Funds

### Description & procedures

Lincoln Housing Authority has budgeted funds and will use forfeited FSS escrow (if any), to provide assistance to participants in the Family Self-Sufficiency Program. The FSS Assistance is both an incentive for FSS participation as well as a way to assist families in achieving their goals. Coordinators review family needs and submit request for payment from the assistance funds in accordance with the family's individual training and service plans and these guidelines for use of funds.

### Requesting Assistance

Coordinators will provide families with information about the availability of the assistance funds and how to access funds. Coordinators will submit a request for payment form along with supporting documentation for the expenditure. Supporting documentation can include statements or invoices, receipts, or other evidence of the amount of the expenditure. As much as possible, payments will be made directly to the vendor or service provider rather than the FSS participant.

An ongoing list of actual expenses through FSS assistance, escrow funds, or other agency grants will be maintained.

### Specific uses for FSS Assistance Funds

Following are items for which FSS Assistance Funds may be used:

#### 1. Education Costs

Educational assistance is provided at Nebraska colleges for undergraduate course work to earn a college degree or training diploma or certificate. Educational assistance excludes graduate courses, correspondence courses, credit by examination and testing out of courses.

##### Standard schedule of Assistance:

College on a quarter system: \$29.00 per credit hour for up to 15 credit hours

College on a semester system: \$39.00 per credit hour for up to 15 credit hours

##### Special schedule of Assistance:

Students, who have other 3<sup>rd</sup> party resources, excluding Pell Grants and student loans, are required to report and use those resources first to meet needs for tuition, fees, and books. Examples of third party resources include scholarships, military tuition assistance, grants, and assistance from other agencies. FSS participants will use LHA assistance only if there

is remaining unmet need for tuition or books. LHA assistance is intended only for individuals who have no other form of assistance specifically for these costs. FSS education funds cannot be used for test preparation programs or admissions tests, though these costs may be covered through the other needs funds. FSS funds will not be approved for non-accredited schools, for profit schools and schools whose credits are not reliably transferred to other approved institutions.

NOTE: At schools where payment is accepted after the term, LHA will pay only for completed credit hours. Students are required to submit grades and must achieve at least a grade point average of 2.0 on a 4.0 point scale to receive future assistance. Tuition assistance will not be provided for graduate school education or graduate school admissions tests. College application, initial registration costs or graduation-related costs are not covered.

Participants who fail to complete a class or do not achieve a passing grade will not receive future assistance for that class. A pattern of incomplete courses, failing grades, or a cumulative grade point average below 2.0 on a 4.0 scale will disqualify a participant for tuition assistance.

**GED Testing** 100% of the cost of GED Testing @ \$30.00 per tests. Payment can be approved to take test up to two times.

### **ESL Classes**

Cost for all ESL classes at SCC are currently fully funded through the Adult Education and Family Literacy Act.

Advanced courses are for credit and covered under the tuition per credit hour plan. Students are responsible for the cost of books.

For the Intensive English Program (IEP) at UNL, approval can be given for \$200 for full-time enrollment and \$100 for part-time\summer enrollment.

The TOEFL test can be paid for one time for up to \$100.00 if needed for undergraduate college enrollment but not graduate school enrollment.

### **Money Owed to College/University**

FSS Participant may be eligible, on a case-by-case basis, for past debt owed to a college or university that would be eligible for FSS tuition assistance, if the debt prevents enrollment in a college or university. Debts accrued anytime during participation in the FSS program will not be eligible. LHA will offer a one-time match payment up to a maximum of \$500. Verification that FSS participant's portion is paid must be received before LHA will authorize payment.

**2. Transportation:**

100% of cost of a monthly Bus Passport for school or work using the Low Income Bus Pass program.

Emergency car repairs will be considered on a case-by-case basis. No more than \$500.00 will be allowed for car repairs per fiscal year and will not be allowed for most routine maintenance or repairs of cars. Routine maintenance or repairs include: fluids (fluid changes unless it is necessary for a larger repair) and most body damage repairs. The car must be registered in the name of the FSS family and must be insured. Participants will always pay at least 20% of the cost of the repair. LHA may require two estimates. LHA must give the client approval to proceed with repairs before repairs are made. If grants or assistance are obtained from other agencies, the participant must pay 20% of the remaining amount after factoring in other assistance. Upon approval, participants may also access LHA's Discretionary Loan Fund through their housing specialist. This requires a repayment agreement. If the discretionary loan program is being used, those funds can be counted as part of the participant's 20% share of the cost of repair.

- 3. Child Care:** Assistance with child care expense will be considered only for attendance at work or school. Families should be encouraged to apply at the Department of Health and Human Services (DHHS) for child care assistance if applicable. No payments will be made for child care if the family is eligible and is currently receiving assistance with child care through the DHHS. LHA will pay no more than 50% of the family's cost of child care and must be provided in a licensed child care home or center.

Child care assistance is limited to \$400.00 per household per fiscal year.

- 4. Other needs:** A maximum of \$400.00 for professional licensing tests and fees, counseling, evaluations, uniforms for jobs, or other special expenses directly related to starting employment or other goals in the plan. Test preparation programs or admissions tests may be covered on a case-by-case basis. FSS Assistance cannot be used to obtain permanent resident card, employment authorization documents, citizen identification cards, etc. For SCC Health Statement forms, assistance can be used for Titer test and required immunizations but not chest x-ray, or criminal background check.

This FSS Assistance is limited to \$400.00 during the entire program participation, not \$400.00 per year.

Assistance with Driver Education Training to achieve a license is provided at 50% of participant's cost up to \$200 in assistance under this category.

5. **FSS Graduation:** Graduates from the FSS program who do not receive an escrow payment may receive a gift certificate up to \$200.00 or other appropriate recognition of their accomplishment.

### **Annual Ceiling on FSS Assistance**

There will be an annual ceiling per participant family of \$800.00 per year of FSS Assistance and/or Escrow Funds for the period of April 1 to March 31. For participants who are in school, the ceiling will be \$1,400 for one person in school and \$1,600 for families where more than one participant with an ITSP is enrolled in school. Grant funds from other funding sources (if available) may be used to exceed these limits in accordance with the grant program.

### **Special Provisions**

Coordinator's Role: The Coordinator's role is to inform participants of the funds, manage the assistance program and request payments in accordance with these guidelines.

Third Party Payments: As much as possible, payments under this assistance program must be made directly to the vendor or service provider.

Advance Approval Required: No retroactive payments will be allowed. Payments must be approved in advance by the coordinator, or they will not be allowed.

Families Eligible: Only families who have a fully executed FSS contract of participation are eligible for assistance. Families who are in the referral process or whose contract has been signed but the effective date has not occurred are not eligible for this assistance.

Individuals Eligible: For most assistance, the recipient must not just be a family member but must have an Individual Training and Services Plan.

Other Funding Sources: The coordinator and family must explore and take advantage of other funding sources prior to accessing assistance.

Current Compliance with FSS Contract: The participant family must currently be in compliance with the FSS contract and is progressing satisfactorily toward goals and objectives of the Individual Training and Services Plan (ITSP). The utilization of assistance funds should be in accordance with the overall goals of the ITSP. In some cases, it may be necessary to amend the ITSP with revised or additional goals/objectives.

Loans for Deposits or Other Needs: The assistance program and funds are not a loan program. No funds shall be used for loans for deposits, utilities, or other housing needs.



Completed\Terminated Contracts: Families who's FSS Contracts of Participation have been completed or terminated are not eligible for the assistance funds.

### **FSS Escrow Funds**

Coordinators are also responsible for informing families of their ability to access escrow funds as allowed under the Combined Housing Choice Voucher and Public Housing FSS Action Plan. However, access to escrow funds must be closely tied to achievement of specific goals and is at the sole discretion of LHA. When a family's escrow fund balance exceeds \$700.00, LHA requires escrow funds be used in place of LHA assistance funds.

If escrow balance is greater than \$700	Use escrow resources instead of FSS Assistance; do not split an expense between FSS Assistance and Escrow
If escrow balance is \$700 or less	Use FSS Assistance

An FSS family is not required to use escrow funds but will not receive FSS assistance if escrow funds are available as shown above.

FSS escrow funds will be available using the same guidelines as used for FSS assistance. At the discretion of the manager, escrow funds may be used for expenses not listed in the guidelines provided they are related directly to achievement of goals. FSS escrow funds are not available for car payments or purchase or other regular household-related expenses. The escrow account will not be reduced below \$5.00 except for final payment upon completion of the FSS contract.

Neither FSS assistance nor escrow funds are provided through any "entitlement" and any access or use of the funds is solely at the discretion of LHA.

### **Miscellaneous**

LHA may contract with another agency to provide some or all of the FSS case management services. The contract may include authorization for some or all of the above forms of assistance to FSS participants.

The Tenant Services Manager monitors the total funds available and may adjust the guidelines to ensure the availability of funds through the fiscal year and to respond to extraordinary circumstances.

## **FAMILY SELF-SUFFICIENCY PROGRAM**

### **FAMILY REQUEST**

#### **FOR PARTIAL PAYMENT OF FSS ESCROW ACCOUNT FUNDS**

HUD Rule:

HUD rules allow that if the LHA determines the FSS family has fulfilled certain interim goals established in the contract of participation and needs a portion of the FSS account funds for purposes consistent with the contract of participation, the LHA may, at the LHA's sole option, disburse a portion of the funds from the family's FSS account to assist the family to meet those expenses.

LHA Guideline:

LHA has determined that a household's escrow funds will be used in place of other LHA assistance funds when a family's escrow fund balance exceeds \$700.00. The amount of FSS escrow funds that will be available will be based on established guidelines. LHA may change the guidelines at its discretion. Under no circumstances will an FSS Escrow Account go below \$5.00. The family members must be in full compliance with their FSS contract and other rules of the program.

Each head of household for the family must sign the statement below to have access to the FSS Escrow Funds. It is not required that the statement be signed. If the family does not wish to use FSS Escrow Funds when they are available, they will not be required to use escrow funds. However, they will not be able to use LHA Assistance Funds.

NAME: \_\_\_\_\_

I hereby certify that I understand the above information regarding access to FSS Escrow Funds and I agree that my signature below represents my request and permission to use the FSS Escrow Account as allowed by LHA and HUD. I understand that money will be subtracted from my family's FSS Escrow Account and the balance will be reduced by the amount of payments made on my behalf. I understand that any payment must be accompanied by verification of expenses for which the money will be used. Checks issued for this purpose will be payable only to the institution or business receiving payment.

This authorization is made for me as the FSS Head of Household and for other members of my family who have an FSS Individual Training and Services Plan.

\_\_\_\_\_  
Signature of FSS Head of Household

Date