

Family Self Sufficiency Action Plan Review Checklist

The Family Self Sufficiency (FSS) Action Plan shall describe the policies and procedures of the Public Housing Authority (PHA) or Multifamily Property Owner for operation of a local FSS program. FSS Action Plan requirements, including procedures concerning the development and approval of the plan, are described in the Code of Federal Regulations at [24 CFR 984.201](#). The [FSS Guidebook may also be used as a helpful resource in the development of FSS Action Plan policies](#) (Section 1.3, *FSS Action Plan and Core Documents for the FSS Program* outlines the basic requirements). The Action Plan shall be developed by the PHA or owner in consultation with the chief executive officer of the applicable unit of general local government and the Program Coordinating Committee. *Please also reference the FSS Final Rule FAQ that may be found on the [FSS Resources Page](#)*

The table below lists the required information of an FSS Action Plan. It follows the same order and categories listed in the regulation (24 CFR 984.201(d)). Other FSS regulatory references that provide additional information concerning a particular topic are included below for convenience.

HUD USE

Reviewer Name _____

Reviewer Email _____

Reviewer Office Location _____

Approved Denied

Decision Date _____

FOR PUBLIC HOUSING AUTHORITIES

PHA Name Housing Authority of Indiana County

PHA Code (e.g. IL006) PA048

Field Office Location Pittsburgh PA

PHA Grant Manager Name Shannon Kundla

PHA Grant Manager Email shannonkundla@haichousing.com

(Only list more than one PHA if it is a joint FSS program or if there is a Cooperative Agreement between the entities. Otherwise, each PHA requires a separate Action Plan. You may add more lines, if needed.)

Primary Point of Contact for this FSS Action Plan

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Title Executive Director

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Phone Number 724-463-4730 Ext. 111

Please submit your completed FSS Action Plan Checklist and FSS Action Plan to PHAFSSActionPlans@hud.gov.

Include PHA Name and PHA Code in email subject line and in the document name of any attachments.

Required Information	Description	Page Number(s)	Notes (for PHA/owner and/or HUD)
Family Demographics	<p>A description of the characteristics of the families expected to be served by the FSS program (including ethnic and racial data, program size) and the supportive service needs of the expected population.</p> <p><i>Note:</i> New FSS programs may assume that FSS participants will be similar to the general population of the PHA or property.</p> <p><i>Note:</i> This is not the demographics of your current FSS program – it is a demographic review of the population of potential participants in your program.</p> <p><i>(see FSS Guidebook Section 1.3 FSS Action Plan and Core Documents for the FSS Program, FSS Action Plan)</i></p>	<p>5-8</p>	
Estimate of participating families (program size/number of FSS slots)	<p>An estimate of the number of eligible families who can reasonably be expected to be enrolled in your FSS program at any one time, based on available resources.</p> <ul style="list-style-type: none"> • If families from another self-sufficiency program are expected to enroll in the FSS program, the number of those families must be also estimated. • Please note that this is different from the minimum number of families that a program is funded to serve. • PHAs ONLY - This number must be at least the minimum program size required for your agency (or agencies, if joint), if applicable. (If you don't know if you still have a Mandatory Minimum Program or don't know how many slots you have, please consult your field office or include the best numbers you have.) <p><i>(see 24 CFR 984.105 and FSS Guidebook Section 2.1 Overview of the FSS Program Coordinator Position, Caseload Size; Section and, Section 6.6 Minimum FSS Program Size)</i></p>	<p>10-11</p>	

Required Information	Description	Page Number(s)	Notes (for PHA/owner and/or HUD)
Eligible families from other self-sufficiency programs	If applicable, the number of families, by program type, who are participating in other self-sufficiency programs that are expected to enroll in FSS.	11	
FSS family selection procedures	<p>Policies and procedures for selecting FSS participants, including whether the PHA or owner will offer a preference to prospective participants who are already enrolled in, or on the waiting list for, FSS-related service programs and whether the FSS program plans to screen prospective participants for motivation to participate (the only allowable screening criteria to include).</p> <p>And, a description of how the PHA's selection procedures ensure selection without regard to race, color, religion, sex, handicap, familial status, or national origin.</p> <p><i>(see 24 CFR 984.203 and FSS Guidebook Section 2.2 Outreach and Enrollment)</i></p>	12	
Incentives to encourage participation	<p>A description of the incentives that the PHA or owner intends to offer eligible families to encourage participation in the FSS program, including FSS escrow accounts.</p> <p><i>(see 24 CFR 984.305 and FSS Guidebook Section 2.2 Outreach and Enrollment)</i></p>	15	
Outreach efforts	<p>A description of the planned notification and outreach efforts by the PHA or owner to recruit FSS participants from among eligible families and to provide FSS information to minority and non-minority families.</p> <p><i>(see FSS Guidebook Section 2.2 Outreach and Enrollment)</i></p>	14-15	

Required Information	Description	Page Number(s)	Notes (for PHA/owner and/or HUD)
FSS activities and supportive services	<p>A description of the activities and supportive services to be provided to FSS families by both public and private providers and identification of the public and private resources which are expected to provide the supportive services.</p> <p><i>(see FSS Guidebook Section 3.3 Referrals to Service Providers)</i></p>	17	
Method for identification of family support needs	<p>A description of how the FSS program will identify the needs of participating families and deliver the appropriate support services.</p> <p><i>(see FSS Guidebook Section 2.4 Participant Assessments)</i></p>	18-19	
Program termination; withholding of services; and available grievance procedures	<p>Policies for terminating or withholding supportive services or FSS participation for failure to comply with the Contract of Participation. And, the grievance and hearing procedures available to FSS families.</p> <p><i>(see FSS Guidebook Section 2.3 Contract of Participation and Individual Training and Services Plan)</i></p>	23-25	
Assurances of non-interference with the rights of non-participating families	<p>A statement that provides an assurance that a family's election not to participate in the FSS program will not affect the family's participation in the rental assistance program.</p> <p><i>(see FSS Guidebook Section 1.2 What is FSS and Why is it Important?)</i></p>	26	
Timetable for program implementation	<p>A schedule for program implementation and for filling all FSS slots with eligible FSS families.</p> <p><i>Note: This question is geared to new programs. If you have already been running a program, you may state that you have an existing program and will continue implementing it. Or, you may describe the timetable to implement any policy changes.</i></p> <p><i>(see FSS Guidebook Section 2.2 Outreach and Enrollment)</i></p>	26	

Required Information	Description	Page Number(s)	Notes (for PHA/owner and/or HUD)
Certification of coordination	<p>PHAs only - A certification by the PHA 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. (This provision does not apply to multifamily owners.)</p> <p><i>(see FSS Guidebook Section 3.3 Referrals to Service Providers, and Section 6.1 Building Partnerships)</i></p>	27	

Required Information	Description	Page Number(s)	Notes (for PHA/owner and/or HUD)
Availability of a Program Coordinating Committee (PCC)	<p>PBRA owners only:</p> <p>A statement indicating whether there is an existing PCC that serves the area where the property is located.</p> <p>If there is an existing PCC where the property is located, a statement indicating whether it is available for the owner to work with.</p> <ul style="list-style-type: none"> ○ Note: If the owner has made good-faith attempts to reach out to the existing PCC about joining and has received an unfavorable response/no response, then the existing PCC is not considered available. <p>If there is a PCC that is available for the owner to work with, a statement indicating whether the owner will work with the existing PCC or start their own.</p> <p>If there is NO existing PCC that is available for the owner to join, a statement indicating whether the owner plans to start their own.</p> <ul style="list-style-type: none"> ○ If there is no available PCC, the owner is not required to start their own, but is encouraged to do so. If the owner chooses not to start a PCC, HUD encourages them to develop an alternative approach allowing them to get regular feedback from service providers and FSS participants. 	<p>NA</p>	
Other Required Policies (codified either in the Action Plan or separately)	<p>Any other information that would help HUD determine the soundness of the PHA or owner’s FSS program.</p> <p>Examples of policies in list below. <i>(see FSS Guidebook Section 1.3 FSS Action Plan and Core Documents for the FSS Program)</i></p>	<p>NA</p>	
	<p>Policies related to the modification of goals in the ITSP, including limits on modifications as participants approach graduation;</p>	<p>20-22</p>	

Required Information	Description	Page Number(s)	Notes (for PHA/owner and/or HUD)
	The circumstances in which an extension of the Contract of Participation may be granted	20-22	
	Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any);	15-16	
	Policies regarding eligible uses of forfeited escrow funds by families in good standing;	15-16	
	Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating;	12-13	
	Policies on requirements for documentation of goal completion;	20-22	
	Policies on documentation, designation, and change of the household's designation of the "Head of FSS family;"	14	
	PHAs only - Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference)-	12	
	Other policies FSS program related policies over which PHA or owner has discretion (if applicable). Please add rows and list.	12-14	

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I. Introduction

Introduction

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by the **Housing Authority of Indiana County**. It was submitted to HUD on **September 13, 2022**.

The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of HUD assistance with public and private resources in order to enable eligible families to make progress toward economic security.

The purpose of the FSS Action Plan is to establish policies and procedures for carrying out the FSS program in a manner consistent with HUD requirements and local objectives.

This FSS Action Plan describes the **Housing Authority of Indiana County's** local policies for operation of the FSS program in the context of federal laws and regulations. The FSS program will be operated in accordance with applicable laws, regulations, notices and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.

The FSS program and the functions and responsibilities of PHA staff are consistent with the **Housing Authority of Indiana County's** personnel policy and Agency Plan.

II. Program Objectives

The objective of the **Housing Authority of Indiana County's** FSS program is to reduce the dependency of low-income families on welfare assistance and on housing assistance. Under the FSS program, low-income families are provided opportunities for education, job training, counseling, and other forms of social service assistance, while living in assisted housing, so that they may obtain the education, employment, and social skills necessary to achieve self-sufficiency. Program success is also based on the number of FSS families who, as a result of participation in the program, have family members who obtain their first job, or who obtain higher paying jobs; no longer need benefits received under one or more welfare programs; obtain a high school diploma or higher education degree; or accomplish similar goals that assists the family in obtaining economic independence. The FSS program will operate in conformity with Housing and Urban Development regulations.

III. Program Size and Characteristics

III.A. – Family Demographics

Family Demographics

These tables describe the demographics of the population expected to be served by the Housing Authority of Indiana County’s Action Plan.

The FSS program will serve the following housing assistance programs:

- Public Housing,
- Housing Choice Vouchers (HCV): Tenant-Based Vouchers
- Housing Choice Vouchers (HCV): Other special purpose vouchers (*VASH, EHV*)

Housing Choice Vouchers includes VASH & EHV as of 07/2022)	Total Families	Percent of Total
All Families	469	
Single	363	77%
Female HOH	316	67%
Male HOH	153	33%
Race		
White	418	89%
Black/African American	35	7.5%
American Indian/Alaska Native	4	0.85%
Asian	2	0.43%
Native Hawaiian/Other Pacific Islander	0	0
Ethnicity		
Hispanic or Latino	10	2.13%
Not Hispanic or Latino	459	97.87%

Income		
Extremely Low-Income	343	73.13%
Very Low-Income	110	23.45%
Low-Income	12	2.56%
HOH Income from Wages	68	14.50%
Other Member Income from Wages	14	2.99%
HOH Income from TANF	12	2.56%
Other Member Income from TANF	0	0
HOH Income from SSI	444	94.67%
Other Member Income from SSI	58	12.37%
Number of Children		
0	406	87%
1-2	54	12%
3-4	8	0.02%
5 or more	1	0.002%
Total Number of Family Members		
1-2	425	91%
3-4	42	0.09%
5 or more	2	0.004%
Persons with Disabilities		
HOH Person w/ Disabilities (HUD)	316	0.67%
Family Members w/ Disabilities	32	0.07%

Public Housing (as of 07/2022)	Total Families	Percent of Total
All Families	155	
Single	117	75%
Female HOH	99	64%
Male HOH	48	31%
Race		
White	149	96%
Black/African American	4	3%
American Indian/Alaska Native	0	0
Asian	0	0
Native Hawaiian/Other Pacific Islander	0	0
Ethnicity		
Hispanic or Latino	2	1.30%
Not Hispanic or Latino	153	98%
Income		
Extremely Low-Income	95	98%
Very Low-Income	37	24%
Low-Income	13	8%
HOH Income from Wages	27	17%
Other Member Income from Wages	4	3%
HOH Income from TANF	2	2%
Other Member Income from TANF	0	0
HOH Income from SSI	122	79%
Other Member Income from SSI	14	9%

Number of Children		
0	120	77%
1-2	22	14%
3-4	3	2%
5 or more	0	0
Total Number of Family Members		
1-2	140	90%
3-4	13	8%
5 or more	2	2%
Persons with Disabilities		
HOH Person w/ Disabilities (HUD)	84	54%
Family Members w/ Disabilities	8	5%

III.B – Supportive Services Needs

Supportive Services Needs of Families Expected to Participate in FSS

The following is a list of the supportive service needs of the families expected to enroll in the **Housing Authority of Indiana County's** FSS program:

- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerated basic skills instruction
- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for child care
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Access to counseling or treatment for substance abuse and mental health
- Dental care, health care, and mental health care including substance abuse treatment/counseling
- Homeownership readiness

This list of supportive services needs is based on:

- Experience with past FSS or other supportive service program participants
- Input from the FSS Task Force or other service provider partners

III. C. – Estimate of Participating Families

Estimate of Participating Families

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

In recent years, the **Housing Authority of Indiana County** has been funded for (1) full-time of coordinator. The minimum number of participants required to be served based on this funding is 25.

Historically, the **Housing Authority of Indiana County’s** FSS program has enrolled 14 new families into the FSS program each year. Accordingly, the **Housing Authority of Indiana County** expects to be able to provide FSS Services to 30 families over a five-year period.

Minimum Program Size. In accordance with CFR §984.105, the **Housing Authority of Indiana County** has a remaining FSS program mandate to serve (1) one family. This is calculated based on the table below. This is our best estimate at this time, and it includes the mandate for both the Public Housing program and the HCV program and counts graduates from both programs.

Original Number of Participants Mandated in both HCV and PH	FSS Graduates	Remaining Mandatory Slots
<u>50</u>	<u>49</u>	<u>1</u>

Therefore, as of the time of preparation of this Action Plan, the **Housing Authority of Indiana County** expects to be able to serve 30 families in the FSS program at any one time.

III. D – Other Self-Sufficiency Programs

Other Self-Sufficiency programs

The **Housing Authority of Indiana County** administers EHV and HUD VASH Vouchers. These participants have been included in the overall FSS Family Demographic statistics. All EHV and HUD VASH Voucher holders are awarded the same opportunity to participate in the **Indiana County Housing Authority's** FSS Program.

IV. Family Selection Procedures

Family Selection Procedures

The FSS program has not adopted any admissions preferences. Families will be selected based on the following selection method:

1. The family selection process is based on the requirements set forth in § 984.203 ensuring that families are selected without regard to race, color, religion, sex, handicap, familial status, or national origin.

In order to select applicants for the FSS program we will take participants from the following:

- A. Individuals receiving offers of housing assistance will be offered participation in the program and will complete the FSS interest card at the initial briefing for Section 8 participants and during the appointment to collect the security deposit for Public Housing participants;
- B. Current program participants of housing assistance programs within HAIC:
 1. Will be re-notified annually through annual recertification mailings.
 2. If needed, FSS information interest cards will be mailed to all Section 8 Voucher and Public Housing participants.
- C. All interested applicants will be contacted by either mail, email, phone, or a face-to-face meeting to discuss in detail further participation in the FSS program. Interested applicants will be scheduled an appointment to complete enrollment.
- D. If a waiting list is necessary, completed FSS interest cards will be date and time stamped. Cards will be placed in the FSS box and families will be selected in the order they were received. When an opening is available families will be notified by mail and will be given ten (10) calendar days in which to respond if they are interested. If no response occurs within ten (10) calendar days they will be placed at the bottom of the waiting list.

Compliance with nondiscrimination policies

It is the policy of the **Housing Authority of Indiana County** to comply with all Federal, State, and local nondiscrimination laws and regulations, including but not limited to the Fair Housing Act, the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the grounds of race, color, sex, religion, national or ethnic origin, family status, source of income, disability or perceived gender identity and sexual orientation. In addition, the **Housing Authority of Indiana County's** FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).

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

Re-enrollment of prior FSS participants

A former participant may re-enroll into the FSS Program under certain conditions.

- **Graduated Participant** – If a graduated FSS household requests to re-enter the FSS Program and had not received any escrow dollars, they may re-apply to the program and their application will be reviewed by the FSS Coordinators. If the graduated family received escrow dollars, they may not re-apply to the FSS Program with the same head of household. If they designate a new head of household, they would be permitted to re-apply to the FSS program.
- **Terminated Participant** – If a terminated FSS household requests to re-enter the FSS Program, they may re-apply to the program and their application will be reviewed by the FSS Coordinators.
- **Participant Withdrew** – If the household withdrew from the FSS Program and requests to re-enter the FSS Program, they may re-apply to the program and their application will be reviewed by the FSS Coordinators.

Participants whom complete the application to re-enter the FSS Program will have their request reviewed with these conditions in mind:

- Past performance in the FSS Program including reason for termination or withdrawal
- Past compliance with their contract obligations

If a former family is denied re-entry into the FSS Program they have a right to appeal the decision in writing and request an informal hearing. Informal Hearing Procedures for Participants will then be followed.

Head of FSS Family

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

- A form developed by the Housing Authority of Indiana County

V. Outreach

Outreach

The **Housing Authority of Indiana County** will conduct widespread outreach to encourage enrollment in the FSS program. Outreach efforts will include the activities identified through the checked boxes below. Interpreters will be used as needed and clients may contact staff to express interest in person, via telephone or by email.

Outreach Methods	Details, including frequency
Posting information about FSS on the Housing Authority of Indiana County's website, Including the FSS video	On-Going
Posting FSS program flyers in locations likely to be seen by eligible families	On-Going
Providing information about the FSS program during scheduled reexaminations	On-Going
Providing information about the FSS program at orientation sessions	On-Going
Providing information about the FSS program to eligible families by mail	Annually or as-needed
Facebook	On-Going

Outreach informational material about the FSS Program will include information about:

- Program overview
- Program benefits
- Available resources
- Participant responsibilities
- Program outcomes

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

VI. FSS Escrow Account and Other Incentives for Participants

FSS Escrow Account and Other Incentives for Participants

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account, as well as any additional incentives offered by the **Housing Authority of Indiana County**, are described below.

A. Additional Incentives

While the **Housing Authority of Indiana County's** FSS program does not provide any other financial incentives for FSS participants, it does provide coaching services, as well as referrals to other service providers, that can be very valuable for FSS program participants.

B. Interim Disbursements

If a participant wishes to withdraw funds from their Escrow Account before their contract is completed, the Head of Household must submit a written request and documentation to a Program Coordinator. The coordinator will review the request and documentation, to ensure:

- The request is not more than 75% of the total amount available in escrow
- There is verified progress towards goals
- The withdrawal will be used for emergency situations in which all other resources have been exhausted
- The withdrawal may only be used specifically for reasons to move towards the participants' goals of self-sufficiency
- Payment will be made directly to sources

The Program Coordinator refers the request to the Task Force for review and approval. The Task Force will review and decide if it should be approved; the recommendation for approval is then forwarded to the Section 8 Coordinator or Property Manager for the final signature to release funds.

If a request is denied and the participant files a grievance, a representative from the Task Force will be contacted to hear the case.

C. Uses of forfeited escrow funds.

Treatment of forfeited FSS escrow account funds. FSS escrow account funds forfeited will be used to support FSS participants in good standing. Upon written request from a family, the FSS Coordinators and members of the FSS Task Force will consider the available funds and make a determination. The withdrawal may only be used specifically for reasons to move towards the participants goals of self- sufficiency.

At the discretion of the FSS Coordinator and the FSS Task Force, forfeited escrow funds may be considered in lieu of an interim escrow disbursement.

If a participant wishes to utilize funds from a Forfeited Escrow Account, the Head of Household must submit a written request and documentation to a FSS Program Coordinator. The FSS coordinators and the FSS Task Force will review the request and documentation, to ensure:

- The forfeited escrow account has available funding
- The first-time request cannot be more than \$500 (if funds are available). Any subsequent requests will be limited to a cap of \$250. Participants may only receive one disbursement per fiscal year.
- There is verified progress towards goals
- The withdrawal will be used for emergency situations in which all other resources have been exhausted
- The withdrawal may only be used specifically for reasons to move towards the participants' goals of self-sufficiency (ex: books, tools, test fees, uniforms, certification fees, training fees, educational costs, etc.).
- Training for FSS Program Staff
- Payment will be made directly to sources if possible.

The FSS Program Coordinator refers the request to the Task Force for review and approval. The Task Force will review and decide if it should be approved; the recommendation for approval is then forwarded to the Section 8 Coordinator or Property Manager for the final signature to release funds.

If a request is denied and the participant files a grievance, a representative from the Task Force will be contacted to hear the case.

In the event that the Forfeited Fund Account exceeds a balance of \$10,000, coordinators will consider a one-time disbursement to participants in good standing, at the end of the fiscal year.

VII. Family Activities and Supportive Services

Family Activities and Supportive Services

As described in the next section, all families participating in the FSS program will benefit from coaching that helps them identify and achieve goals that the family selects. Drawing on partners on the FSS Task Force and relationships with other service providers, the coaches will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals:

- Indiana County's Department of Human Services provides centralized information and referrals; the Department produces a Human Service Directory, a flyer of available resources, a flyer of support groups, and a flyer of no/low-cost health care. The Department created a flyer entitled Steps to Employment in Indiana County with FSS participants in mind. All of these flyers are given to participants when they are oriented. Participants are referred to the online directory at www.humanservice-countyofindiana.org.
- All new FSS participants will be introduced to the FSS Resource Library during the initial FSS intake interview as well as any subsequent face to face meetings. Resources are made available at all times.
- Participants will be encouraged to attend programs that will benefit them reaching their goals; such as Financial Literacy and Renter's Prep programs.

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

Method of Identifying Family Support Needs and Delivering Appropriate Support Services

A. Identifying Family Support Needs

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

The formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.

B. Delivering Appropriate Support Services

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

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

C. Contact Obligations: Knowing the value of consistent communication with our FSS participants, we require the following contact obligations as defined below:

- If participants are working or in school part-time or full-time, they must contact a Program Coordinator once each month for the first six months they are in the FSS program. After that, they must contact a Program Coordinator every other month to discuss the progress of their goals. Participants must meet with a Program Coordinator face to face once per year to update the written plan.
- If participants are not working or in school, they must contact the Program Coordinator once each week, for the first six months they are in the FSS program. After that, they must contact a Program Coordinator at least twice each month to discuss the progress on their goals. Participants must meet with a Program Coordinator once a quarter (every three months) to update their written plan.
- Reasonable accommodations may be made for face-to-face meetings for participants that have been ported to another HCV Program, but remain in the initial HCV FSS Program. Telecommunications will be considered if the distance exceeds 50 miles from HAIC.
- Participants are encouraged to accept responsibility for making the contact with a program coordinator. If participants fail to make contact, a program coordinator will make an attempt to call or email them. If the participant does not respond to the phone call or email, a program coordinator will send a “no contact letter” to the participant. If the participant fails to respond to the no contact letter, a program coordinator will send out a second notice no contact letter.
- If the participant does not respond within ten (10) calendar days, a program coordinator will send out a termination letter. The participant will have the right to appeal their termination to members of the Task Force.

All FSS Participants and family members will be notified in writing, should they require an interpreter due to a language barrier and/or assistance for special needs. They will also need to make those requirements known to an FSS Coordinator.

IX. Contract of Participation

Contract of Participation

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

A. Form and content of contract

The CoP, which will incorporate one ITSP for each participating member of the family, sets forth the principal terms and conditions governing participation in the FSS program. These include the rights and responsibilities of the FSS family and of the **Housing Authority of Indiana County**, the services to be provided to, and the activities to be completed by, each adult member of the FSS family who elects to participate in the program.

B. ITSP goals

Each individual's ITSP will establish specific interim and final goals by which the **Housing Authority of Indiana County** and the family will measure the family's progress towards fulfilling its obligations under the CoP. For any FSS family that is a recipient of welfare assistance at the outset of the CoP or that receives welfare assistance while in the FSS program, the **Housing Authority of Indiana County** will establish as a final goal that every member of the family become independent from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

C. Determination of suitable employment

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

D. Contract of Participation term and extensions

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

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

E. Completion of the contract

The CoP is completed, and a family's participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members' ITSPs, on or before the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed. The **Housing Authority of Indiana County** will accept the following form of verification for completion of the ITSP goals:

The **Housing Authority of Indiana County** will require a combination of self-certification and third-party verification to document completion of ITSP goals.

- Participant (HOH) is suitably employed.
- Employment verification will be verified by the FSS Coordinators
- Participant provided written certification that the Head of Household (HOH) is not receiving cash welfare assistance at the time of graduation.
- Participants completed all obligations under the CoP and the goals outlined on the ITSP.

Graduation: In general, there are two types of graduations:

- **On-Time Graduation:** This occurs at the end of the contract when the CoP requirements have been fulfilled, the HOH has sought and maintained “suitable employment,” is not currently receiving cash welfare assistance at the time of graduation and the HOH has completed the goals in their ITSP. A written request shall be made prior to the end of the participants CoP.
- **Early Graduation:** A participant HOH can request an early graduation, in writing, if they have fulfilled their COP and ITSP. To qualify for an early graduation, participants must fulfill the same obligations as an on-time graduation.

FSS participants completing Contract of Participation are eligible for any FSS escrow accumulated, minus any monies due to HAIC.

F. Modification

The **Housing Authority of Indiana County** and the FSS family may mutually agree to modify the CoP with respect to the ITSP and/or the contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by the **Housing Authority of Indiana County** as well as the Head of FSS Family.

The **Housing Authority of Indiana County** will allow for modifications to the CoP under the following circumstances:

- When the modifications to the ITSP improve the participant’s ability to complete their obligations in the CoP or progress toward economic self-sufficiency
- When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, after consultation with the **Housing Authority of Indiana County**, designate another family member to be the FSS head of family
- The Housing Authority of Indiana County will not allow modifications if the CoP is within sixty (60) business days from the end of the term, unless good cause has been established and determined by the FSS Coordinators and the FSS Task Force.

G. Consequences of noncompliance with the contract

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

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

Program Termination

A. Involuntary Termination

The **Housing Authority of Indiana County** may involuntarily terminate a family from FSS under the following circumstances:

I. If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan and related documentation. Non-compliance includes:

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

II. If the participant's housing assistance has been terminated.

1. Participants who fail to meet their obligations under paragraph I above, as determined by an FSS coordinator, will be sent a "no contact letter." This letter will contain related documentation stating the reason for failing to meet their obligations. They will be given ten (10) calendar days to make contact with the FSS Coordinators.
2. If after ten (10) calendar days, the participant has not made contact with the FSS Coordinators, a second "no contact letter" will be sent, giving an additional ten (10) calendar days to make contact.
3. If at this point no contact has been initiated, a final termination letter will be sent, giving them ten (10) more calendar days and if no contact is made, a termination date is given. The letter will also provide a statement informing the family of their right to request an informal hearing and the date by which this request must be received (see Grievance Procedures)
4. A statement informing the family that termination from the FSS Program for the reasons stated therein will not result in termination of the family's housing assistance. Failure to request a hearing in writing by the deadline will result in closure of the family's FSS file and all right to a hearing will be waived. All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. Housing assistance will not be terminated based on non-compliance with the FSS Program. The current amount of escrow in the family's escrow account will be included in the letter.

B. Voluntary Termination

Participants may also be terminated from the FSS program under the following circumstances:

- Mutual consent of both parties; and/or
- The family's withdrawal from the program.

C. Termination with Escrow Disbursement

In most cases, families whose FSS contracts are terminated will not be entitled to disbursement of their accrued FSS escrowed funds.

However, the CoP will be terminated with FSS disbursement when one of the following situations occurs:

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

D. Grievance Procedures

All requests for an informal hearing must be received by the **Housing Authority of Indiana County** Coordinator within ten (10) calendar days of the date of the FSS termination letter. If a hearing is requested by the FSS family, notification to the family regarding the date, time, and location of the informal hearing will be made by mail.

Persons included in the informal hearing shall include, but not be limited to:

- The FSS head of household;
- The FSS Coordinator;
- The **Housing Authority of Indiana County** staff member, other than FSS program staff, serving as the Hearing Officer; and
- At least one member of the FSS Task Force

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

The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made in writing within (5) calendar days prior to the hearing date.

If the family does not appear at the scheduled time and was unable to reschedule the hearing in advance due to the nature of the emergency, the family must contact the **Housing Authority of Indiana County** within five (5) calendar days of the scheduled hearing date. The **Housing Authority of Indiana County** will then reschedule the hearing. The Hearing Officer will issue a written decision to the family within ten (10) calendar days after the hearing. The decision made by the Hearing Officer will be final. The **Housing Authority of Indiana County** reserves the right to overturn the Hearing Officer's decision only in the event that the decision is contrary to the organization's written policies.

Families have the right to:

- examine the documents submitted to the Hearing Officer
- present any or all information pertinent to the issue of the hearing
- request that a Program Coordinator or a Task Force member be available or present at the hearing to answer questions pertinent to the case;
- be represented by legal counsel or other designated representative at their own expense

In addition to the other requirements contained in this section HAIC has a right to:

- present evidence and all or any information pertinent to the issue of the hearing
- have its attorney present; and
- have the Program Coordinator familiar with the case present

The informal hearing shall concern only the issues listed in the opportunity for hearing request received by the family.

Evidence presented at the hearing may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

XI. Assurance of Non-Interference

Assurance of Non-Interference

Participation in the FSS Program is voluntary. A family's decision on whether to participate in FSS will have no bearing on the **Housing Authority of Indiana County's** decision of whether to admit the family into **Public Housing, Housing Choice Voucher, VASH, or EHV Programs**. The family's housing assistance will not be terminated based on whether they decide to participate in FSS, their successful completion of the CoP, or on their failure to comply with FSS program requirements.

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

XII. Timetable

Timetable

The **Housing Authority of Indiana County** implemented its FSS program in **1992** and will continue to implement it per this FSS Action Plan.

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

Reasonable Accommodations, Effective Communications and Limited English Proficiency Requirements

Requests for Reasonable Accommodations

A person with disabilities may request reasonable accommodations to facilitate participation in the FSS program. Requests will be considered on a case-by-case basis.

Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's reasonable accommodations policy. The policy is available online at

www.haichousing.com.

Request for Effective Communications

A person with disabilities may request the use of effective communication strategies in order to facilitate participation in the FSS program. Examples include: appropriate auxiliary aids and services, such as interpreters, computer-assisted real time transcription (CART), captioned videos with audible video description, visual alarm devices, a talking thermostat, accessible electronic communications and websites, documents in alternative formats (e.g., Braille, large print), or assistance in reading or completing a form, etc.

Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's effective communications policy. The policy is available online at www.haichousing.com.

Limited English Proficiency

The **Housing Authority of Indiana County** will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available online at www.haichousing.com.

XIV. Coordination of Services

Coordination of Services

A. Certification of Coordination

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

B. Program Coordinating Committee

The principal vehicle for ensuring ongoing coordination of services is the FSS Task Force, 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 FSS Task Force will help the FSS program to identify and build strong referral relationships with providers of supportive services that meet the needs of FSS participants. The FSS Task Force will also be consulted in developing program policies and procedures.

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

1. One or more FSS Program Coordinators
2. One or more participants from each HUD rental assistance program served by the FSS program.
3. Representatives from a variety of agencies and individuals, which include but are not limited to the following:
 - Indiana County Department of Human Services
 - Indiana County Community Action Program
 - Alice Paul House
 - Housing Authority of Indiana County
 - Indiana County Office of Planning and Development
 - Family Promise
 - CareerT.R.A.C.K.

XV. FSS Portability (Applicable to HCV Only)

Portability

A. Portability in initial 12 months

FSS participants may not exercise portability within the initial 12 months after signing a CoP. The Housing Authority of Indiana County will consider exceptions to this policy for purposes of reasonable accommodations when requested.

B. Moves into the PHA's jurisdiction

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

Regardless of whether the **Housing Authority of Indiana County** is able to receive an incoming family from another jurisdiction into the FSS program, the **Housing Authority of Indiana County** will agree to allow and support porting families to remain in their initial PHA's FSS program after porting housing vouchers if the initial PHA requests that the family remain in the initial FSS program and can demonstrate the family is able to fulfill its responsibilities under the initial CoP, the move in jurisdictions notwithstanding. Full regulation can be found at 24 CFR 984.306(b)(1).

C. FSS termination with disbursement for porting families

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, the **Housing Authority of Indiana County** will closely examine the family's progress to determine if it would be appropriate to exercise FSS Termination with Disbursement as discussed above in the section on Termination.

Where continued FSS participation is not possible, the **Housing Authority of Indiana County** will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR § 984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS program.

C. Other Policies

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

D. Definitions

Definitions

The definitions below are specified in CFR 24 984.103. The terms 1937 Act, Fair Market Rent, Head of Household, HUD, Public Housing, Public Housing Agency (PHA), Secretary, and Section 8, as used in this part, are defined in 24 CFR Part 5.

Certification means a written assertion based on supporting evidence, provided by the FSS family or the **Housing Authority of Indiana County**, as may be required under this part, and which:

- (1) Shall be maintained by the **Housing Authority of Indiana County** in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification;
- (2) Shall be made available for inspection by HUD, the **Housing Authority of Indiana County**, and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or the **Housing Authority of Indiana County**, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

Contract of Participation (CoP) means - a contract, in a form with contents approved by HUD, entered into between an FSS family and a **Housing Authority of Indiana County** operating an FSS Program that sets forth the terms and conditions governing participation in the FSS Program. The CoP includes all Individual Training and Services Plans (ITSPs) entered into between the **Housing Authority of Indiana County** and all members of the family who will participate in the FSS Program, and which plans are attached to the CoP as exhibits. For additional detail, see § 984.303.

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

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

Enrollment means the date that the FSS family entered into the CoP with the **Housing Authority of Indiana County**.

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

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

FSS escrow credit means the amount credited by the **Housing Authority of Indiana County** to the FSS family's FSS escrow account.

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

FSS family in good standing means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the **Housing Authority of Indiana County**; and is in compliance with the regulations regarding participation in the relevant rental assistance program.pro

FSS related service program means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of “supportive services” set forth in this § 984.103.

FSS slots - refers to the total number of families (as determined in the Action Plan and, for mandatory programs, in § 984.105 of this part) that the PHA will serve in its FSS Program.

FSS Program Coordinator means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS participants; goal setting and case management/coaching of FSS participants; working with the community and service partners; and tracking program performance.

FY means Federal Fiscal Year (starting October 1 and ending September 30, and year designated by the calendar year in which it ends).

Head of FSS family means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent.

Individual Training and Services Plan (ITSP) means a written plan that is prepared by the **Housing Authority of Indiana County** in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

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

Each ITSP must be signed by the **Housing Authority of Indiana County** and the participating FSS family member, and is attached to, and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS Program, including the head of FSS family who has signed the CoP.

Owner means the owner of multifamily assisted housing.

Self-sufficiency means that an FSS family is no longer receiving Section 8, Public Housing assistance, or any Federal, State, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS escrow account funds.

Supportive services mean those appropriate services that a **Housing Authority of Indiana County** will coordinate on behalf of an FSS family under a CoP, which may include, but are not limited to:

- (1) *Childcare*—childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- (2) *Transportation*—transportation necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment;
- (3) *Education*—remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;
- (4) *Employment Supports*—job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;
- (5) *Personal welfare*—substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services;
- (6) *Household management*—training in household management;
- (7) *Homeownership and housing counseling*—homeownership education and assistance and housing counseling;
- (8) *Financial Empowerment*—training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing and improving credit scores, etc.;
- (9) *Other services*—any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD’s legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act.

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

- (1) Nonrecurrent, short-term benefits that:
 - (i) Are designed to deal with a specific crisis or episode of need;
 - (ii) Are not intended to meet recurrent or ongoing needs; and,
 - (iii) Will not extend beyond four months.
- (2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

- (3) Supportive services such as childcare and transportation provided to families who are employed;
- (4) Refundable earned income tax credits;
- (5) Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF);
- (6) Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;
- (7) Amounts solely directed to meeting housing expenses;
- (8) Amounts for health care;
- (9) Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;
- (10) Supplemental Security Income, Social Security Disability Income, or Social Security; and
- (11) Child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child's need and not on the need of the child's current non-parental caretaker.