

HOUSING AUTHORITY of the City of Jefferson, Missouri Family Self-Sufficiency Program ACTION PLAN

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I. Introduction

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS Program operated by the Housing Authority of the City of Jefferson Missouri (JCHA). It was originally submitted to HUD on June 1, 2010.

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 JCHA'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 the 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 the PHA staff are consistent with JCHA's personnel policy and Agency Plan.

II. Program Objectives

JCHA's FSS Program seeks to help families make progress toward economic security by supporting the family's efforts to increase their earned income, build financial capability, achieve their financial goals, etc. The FSS Program is a voluntary program for tenants receiving JCHA housing assistance. The program is designed to reward those families that are able to remove themselves from public welfare assistance within a five-year period. The program consists of two parts, the Contract of Participation (CoP) and the Escrow Account. The CoP outlines the goals of the family and the resources required to meet these goals within five years. The Escrow Account, which is a monetary incentive for the family, accrues over a five-year period equal to an amount by which the rent of the family increases due to earned income.

III. Program Size and Characteristics

A. Family Demographics

The FSS Program will serve all of the Housing Choice Voucher Program including, tenant-based vouchers, project-based vouchers, homeownership and FYI vouchers.

The following tables describe the demographics of the population expected to be served by JCHA's Action Plan.

Ages of Head of Household

| | |
|--|-------|
| Head of Household is age 24 years or younger | 2.5% |
| Head of Household is age 25 to 44 | 45.6% |
| Head of Household is age 45 to 61 | 31.9% |
| Head of Household is age 62 or greater | 20% |

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Presence and Ages of Children

| | |
|--|-------|
| Households that only include adults 18 and older | 45.8% |
| Households that include children under 18 | 54.2% |

Annual Earned Income

| | |
|---|--------|
| Annual household earnings <\$4,999 | 20.6% |
| Annual household earnings between \$5,000 and \$7,999 | 1.9% |
| Annual household earnings between \$8,000 and \$10,999 | 31.25% |
| Annual household earnings between \$11,000 and \$13,000 | 8.75% |
| Annual household earnings over \$13,000 | 37.5% |

Elderly/Disability Status of Head of Household

| | |
|---|-------|
| Head of Household is an elderly person without disabilities | 4.6% |
| Head of Household is an elderly person with disabilities | 15.6% |
| Head of Household is a non-elderly person with disabilities | 31.8% |
| Head of Household is neither an elderly person nor a person with disabilities | 48% |

Race and Ethnicity

| Race | | Non-Hispanic | Hispanic |
|---|-------|--------------|----------|
| White | 28.6% | 28.6 | 0% |
| Black or African-American | 70.9% | 70.9% | 0% |
| American Indian or Alaska Native | 0.5% | 0.5% | 0% |
| Asian | 0% | 0% | 0% |
| Native Hawaiian or other Pacific Islander | 0% | 0% | 0% |
| Other Race | 0% | 0% | 0% |

B. Supportive Services Needs

The following is a list of supportive service needs of the families expected to enroll in the JCHA's FSS Program:

Employment – Including job training, job search assistance, career counseling, job development, entrepreneurial training, resume techniques, appropriate clothing for job interviews and/or employment.

Educational – Including GED, literacy, ESL, vocational education, higher education, financial aid.

Childcare – Including transportation assistance, tuition fees and parenting skills.

Transportation - Public transportation assistance, vehicle insurance, vehicle maintenance, repair and purchase

Other services offered to participants will be family counseling, parenting classes, domestic violence workshops, money management, legal assistance, nutrition, physical and mental health and wellness, home wellness, homeownership readiness

and healthcare workshops. Clinics/Seminars on Fire Safety in the home, home maintenance, pest control, and other “in-the-home” workshops are available.

The list of supportive services needs are based on experience with past and present FSS participants.

C. Estimate of Participating Families

Over time, JCHA 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 and resources permit.

Historically, JCHA’s FSS Program has enrolled 15 new families into the FSS Program each year. Accordingly, JCHA expects to be able to provide FSS Services to 75 families over a five-year period.

In accordance with CFR §984.105 JCHA has a remaining FSS Program mandate to serve 10 families. This is calculated based on the table below. This is our best estimate at this time.

| Original Number of Participants Mandated | FSS Graduates | Remaining Mandatory Slots |
|---|----------------------|----------------------------------|
| 40 | 30 | 10 |

Therefore, as of the time of preparation of this Action Plan, the JCHA expects to be able to serve 60 families in the FSS Program at any one time.

D. Other Self-Sufficiency Programs

No families from other self-sufficiency programs are expected to enroll in the FSS Program.

IV. Family Selection Procedures

All FSS participants will be chosen based on their expressed interest in the FSS Program after their Housing Choice Voucher has been authorized. If interest is expressed 120 days after a full review has been completed, the family may choose to have an interim review conducted in order to join the FSS Program. Should such a review not be in the family’s favor, they may opt to wait until their regular recertification to join FSS. The option to have a review for the purpose of entering the FSS Program is based upon the availability of FSS slots open at the time of expressed interest, and the availability of the coordinators to handle additional cases. Motivational screening factors will be used to determine which families will be selected. Failure to complete specific tasks, such as returning documents or attending required meetings, could result in the family not being selected for participation because this indicates a lack of interest and motivation to follow through with FSS requirements once on the program. Participants will not be selected on the basis of education level, job history or performance, credit ratings, marital status, or number of children. The PHA will not discriminate with regard to race, color, religion, sex, handicap, national origin, or other protected categories. Families will not be denied participation based on an assessment revealing unlikelihood of the family becoming self-sufficient in five years. Families will, however, be reminded before commencement of participation that the FSS Program is an employment program and thus all

participants must be willing and able to maintain employment at a level affording the family more economic independence after necessary supportive services have been attained.

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

The PHA will not select a family that had previously participated in an FSS Program and had been terminated within the previous three years for failure to meet its FSS obligations. The PHA will also deny participation of families who owe any Housing Authority money in connection with the Public Housing Program or Housing Choice Voucher Program.

Graduates of any FSS Program, families terminated with escrow disbursement, and members of previously enrolled families will not be permitted to re-enroll.

FSS participants who have withdrawn voluntarily, families involuntarily terminated and family members who were not Heads of FSS Family previously enrolled, will be permitted to re-enroll. One re-enrollment will be allowed for these families unless there is an extenuating circumstance that would allow another re-enrollment such as employment, completed education, etc.

The Head of the FSS family is designated by the participating family. FSS Program staff may make itself available to consult with families on this decision but it is the assisted household that chooses the Head of the FSS family that is most suitable for their individual household circumstances. The designation or any changes by the household to the Head of the FSS Family must be submitted to FSS Program staff in writing.

It is the policy of JCHA 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, JCHA'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 Program staff will review the file 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, JCHA will select families for participation in the FSS Program in accordance with FSS Regulations and HUD guidelines.

V. Outreach

JCHA and FSS Program staff will conduct widespread outreach to encourage enrollment in the FSS Program. Outreach activities will include, but are not limited to: mailing informational brochures; including FSS information in JCHA publications; posting FSS information on bulletin boards;

providing informational brochures at the JCHA office and other social service agencies; providing information regarding the FSS Program to case workers from other social service agencies; and participants will be informed of the benefits of the FSS Program at annual recertification and briefings.

Outreach information material about the FSS Program will include a program overview, program benefits, available resources, participant responsibilities, and program outcomes.

Outreach efforts will comply with all applicable fair housing protections.

VI. FSS Escrow Account and Other Incentives for Participants

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

A. Additional Incentives

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

B. Interim Disbursements

The JCHA will allow for interim disbursements on a case by case basis: Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP). Requests must be made in writing to the FSS Program staff and include verification that the funds are required for the completion of a goal under the family's CoP. Requests may be made through the term of the CoP. Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment. A determination of whether the family qualifies for the requested interim disbursement will be made on a case-by-case basis by the FSS Advisory Board. The FSS Program staff will first explore options for services and in-kind donations from partners, which must be exhausted before a request for an interim disbursement will be approved.

Interim disbursements may be granted for no more than 50 percent of the family's escrow balance at the time of the request.

Interim disbursements will be paid in the form of a check made payable directly to the agency, business or individual providing the required items or services.

No more than two (2) interim disbursements per FSS family will be approved.

C. Uses of forfeited escrow funds

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

JCHA and the FSS Advisory Board will consider the available funds and make a determination.

FSS Program staff or JCHA may also initiate a request for the use of forfeited escrow funds.

At the discretion of FSS Program staff, forfeited escrow funds may be considered in lieu of an interim escrow disbursement.

Forfeited FSS escrow funds may be deployed no more than 90 days prior to the scheduled expiration of CoP

Use of forfeited escrow funds for eligible uses (described below) may be requested by the JCHA, FSS Program staff, or Head of the FSS family. Eligible uses of forfeited escrow funds include, but are not limited to:

| Eligible Uses | Guidelines / Limitations |
|---|---|
| <input checked="" type="checkbox"/> Purchasing a vehicle | <p>Families interested in using a forfeited escrow funds to purchase a vehicle must first receive a referral to local, community-minded dealerships that provide discounted vehicles.</p> <p>The maximum forfeited escrow fund amount that will be allowed for a vehicle purchase is: \$5,000</p> <p>Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach</p> <p>The terms of any vehicle purchase or vehicle loan will be carefully scrutinized to ensure the terms are reasonable.</p> <p>Head of FSS Household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle.</p> <p>Requests will be considered on a case-by-case basis</p> |
| <input checked="" type="checkbox"/> Child Care | <p>Requests will be considered on a case-by-case basis</p> <p>Other: After-school Programs, birth to school age – one or two days per week to allow for parent(s) to maintain employment</p> |
| <input checked="" type="checkbox"/> Training for participants | <p>Requests will be considered on a case-by-case basis</p> <p>Other: Job skills, computer skills, driver education, CPR/first aid, education as it relates to making progress from one job to another</p> |
| <input checked="" type="checkbox"/> Employment or Educational Costs, including: | <p>Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach</p> |

| | |
|---|---|
| <input checked="" type="checkbox"/> Employment training <input checked="" type="checkbox"/> Employment preparation (e.g., interview training, professional clothing, etc.) <input checked="" type="checkbox"/> Education costs (books, fees, uniforms, tools, etc.) | Household member receiving funding support must be engaged in financial coaching and this request must have the support of their financial coach Requests will be considered on a case-by-case basis Other: Financial requests must be made in writing with proof of cost(s), letter from the business/organization/educational facility, and statement of need |
| <input checked="" type="checkbox"/> Training for FSS Program staff | Requests for funding must be approached by JCHA |
| <input checked="" type="checkbox"/> Other: | On a case-by-case basis for all other requests not covered above. |

VII. 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 program coordinating committee and relationships with other service providers, the coaches will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals:

| Supportive Service Category | Specific Service | Source/Partner |
|-----------------------------|--|---|
| Assessment | Vocational/Educational Assessment Disability Assessment | In-house |
| Child Care | Infant/Toddler/Preschool Care Afterschool Care Homework Assistance | Boys & Girls Club YMCA CMCA – Head Start Memorial Baptist Church |
| Transportation | Bus passes Car repair assistance Car purchase assistance | Jefferson City Transportation Dept. Plaza Tire Big O Tire Local car dealerships |
| Education | GED English as a Second Language Post-Secondary certificates Advanced Degrees | Columbia College State Tech Merrell School of Cosmetology |

| | | |
|---------------------------|--|---|
| Skills Training | Basic Skills Training Emerging Technologies Training On-the-Job Training Apprenticeships Skilled Labor Training | State Tech Vocational Rehabilitation |
| Job Search Assistance | Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement | Dreams to Reality Rose International Department of Workforce Development |
| Health/Mental Health Care | Alcohol and Drug Abuse prevention and treatment Primary Care Dental services Mental Health Services Health Insurance | Cole County Health Department Community Health Center Eyes on Missouri NAMI Landmark Recovery Phoenix House Council for Drug Free Youth |
| Household Management | Household Management Assessment and Training | Cole County Extension Center University Extension Center |
| Homeownership Preparation | Homeownership education and counseling Down payment assistance | Catholic Charities HUD Certified Housing Counselor |
| Financial Empowerment | Financial education and coaching Banking services Money Management Training Debt resolution | Jefferson City Hands Together River Region Credit Union Missouri Credit Union |

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

A. Identifying Family Support Needs

To help determine the supportive services needs of each family, FSS Program staff will assist the family to complete an initial informal needs assessment for that family before completion of the Individual Training and Services Plan (ITSP) and signing of the contract of participation. After enrollment in the FSS Program, the FSS Program staff may make referrals to partner agencies for completion of one or more formal needs assessments. Formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.

Once the combined needs of a family are assessed, Individual Action Plans (IAP) will be developed for each participating family member. The IAP will help the participants to establish short and long- term goals. These goals will be broken down into attainable action steps which will be clearly defined. Action steps and completion dates will be reviewed quarterly to maintain flexibility of the program.

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. Transitional supportive service assistance

Families that have completed their CoP and remain in assisted housing may request assistance with referrals to service providers in order to continue their progress toward economic security. Subject to limitations on staff capacity, JCHA will try to help these families with appropriate referrals. The time spent on these referrals will not be covered by funds designated by HUD to support the FSS Program.

IX. Contract of Participation

All applicants selected for participation in the FSS Program will be required to sign a five-year Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). This section describes the contents of the CoP and the JCHA'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, FSS Program and JCHA, 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 FSS Program staff 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, FSS Program staff 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. FSS Program staff 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 FSS Program staff, 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. FSS Program staff 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 FSS Program staff, 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 FSS Program staff or
- (iii) Any other circumstances that the FSS Program staff determines warrants an extension.

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 FSS Program staff will require a combination of self-certification and third-party verification to document completion of ITSP goals.

F. Modification

The FSS Program staff 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 FSS Program staff as well as the Head of FSS Family.

FSS Program staff 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 FSS Program staff, designate another family member to be the FSS Head of family

☒ When a relocating family is entering the FSS Program of a receiving **PHA** and the start date of the CoP must be changed to reflect the date the new CoP is signed with the receiving **PHA**

The FSS Program staff will not allow modifications if the CoP is within 90 days from the end of the term.

G. Consequences of noncompliance with the contract

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

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

A. Involuntary Termination

The FSS Contract of Participation will be terminated:

- If the FSS family's Housing Choice Voucher Program assistance is terminated
- It is determined that the family has not fulfilled its responsibilities under the CoP
- The FSS Program staff attempts to contact the family in writing and/or by phone, and the family does not respond to the contact
- FSS families who miss three consecutive monthly contacts with their FSS Coordinator
- An act occurs that is inconsistent with the purpose of the FSS Program
- In accordance with HUD requirements

Participants who fail to meet their obligations as stated above, as determined by FSS Program staff, will be given the opportunity to request a hearing with the FSS Advisory Board if they feel the termination from the program was unjust. They must make their request in writing within ten (10) business days from receipt of the FSS termination. FSS termination will be sent by first class mail.

B. Voluntary Termination

Participants may also be terminated from the FSS Program by mutual consent of both parties or if the family withdraws 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:

- Services that the FSS Program staff 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 FSS Program staff 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.

D. Grievance Procedures

All requests for an informal hearing must be received by FSS Program staff and/or JCHA within ten (10) business 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 first class mail.

Persons included in the informal hearing shall include, but not be limited to, The FSS Head of Household, FSS Program staff, JCHA staff members and FSS Advisory Board members. All participants have the right to obtain legal representation and provide 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) 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 FSS Coordinator within 24 hours of the scheduled hearing date, excluding weekends and holidays. The FSS Coordinator will then reschedule the hearing. The Hearing Officer will issue a written decision to the family within ten (10) business days after the hearing. The decision made by the Hearing Officer will be final. The JCHA 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.

XI. Assurance of Non-Interference

Participation in the FSS Program is voluntary. A family's decision on whether to participate in the FSS Program will have no bearing on the JCHA's decision of whether to admit the family into the Housing Choice Voucher Program. The family's housing assistance will not be terminated based on

whether they decide to participate in the FSS Program, their successful completion of the CoP, or on their failure to comply with FSS Program requirements.

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

XII. Timetable

JCHA implemented its FSS Program in 2010 and will continue to implement it per this FSS Action Plan.

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

A. 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 Program staff. 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 in the Administrative Plan. The policy is available online at jchamo.org.

B. Request for Effective Communications

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

Requests should be made initially to FSS Program staff. 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, see also LEP policy, in the Administrative Plan. The policy is available online at jchamo.org.

C. Limited English Proficiency

The JCHA 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 in the Administrative Plan. The policy is available online at jchamo.org.

XIV. Coordination of Services

Jefferson City Housing Authority:

The JCHA will administer the Housing Choice Voucher (HCV) Program within the legal areas allowed by HUD and the laws of the State of Missouri. Actual program administration is performed by the staff of the JCHA and others who may be working at the direction of the JCHA in accordance to the directions and policies as set by the Board of Commissioners of the JCHA.

FSS Program Coordinating Committee:

JCHA will establish a FSS Program Advisory Board to help with planning and lend assistance to administering the HCV FSS Program. Members will be representatives of local agencies and private groups that have resources or programs available to assist low-income families, present tenants, and Housing Authority staff. The FSS Advisory Board will meet quarterly and may conduct business on an as-needed basis via email or telephone or video conferences. The FSS Advisory Board will review services, evaluate its effectiveness and provide updates on present programs as well as introduce new projects and services. The Advisory Board will also serve as a hearing committee for termination of FSS participants or applicants. This board will have the responsibility to assure that the needs of the potential participant are met with the services of the community and will establish educational programming which will help participants become self-sufficient. If it is found that an FSS family is not progressing towards the goals they have set, the FSS Advisory Board will make suggestions to help the family move forward and can make the recommendation that the family be removed from the program.

FSS Coordinator:

The FSS Coordinator will be the Chairperson of the FSS Advisory Board. In addition, the Coordinator will be responsible for developing innovative local strategies that coordinate public and private resources toward the goal of economic independence for FSS families. Duties will also include effectively integrating Housing Programs to assist Housing Choice Voucher families in order to achieve eventual independence from government-assisted programs. The Coordinator may also serve on other committees.

Certification of Collaboration:

The Housing Authority will enter into cooperative agreements with other agencies in the applicable area to develop services and activities for the HCV FSS participants to help them achieve their goals and obtain self-sufficiency and implementation of these agreements will continue to be coordinated, in order to avoid duplication of services and activities. The JCHA will use the following agencies to provide services;

Central Missouri Community Action
Catholic Charities
Community Health Center
Adult Basic Literacy Education (ABLE)
Boys and Girls Club
Council on Drug Free Youth
American Red Cross
Samaritan Center
Goodwill
Head Start
The Redeem Project
MoneySmart (FDIC Program)

Office of the Missouri State Fire Marshal
Dreams to Reality
Cole County Health Department
Missouri State Extension Office
Jefferson City Police Department
Compass Health
Healthy Blue
Missouri Workforce Development
Mid-Mo Legal Services
Healing House
Lutheran Family Services
Salvation Army

MO Dept. of Mental Health
Vocational Rehabilitation
Women Infants and Children (WIC)
YMCA
Pregnancy Help Center
St. Raymond's Society
Missouri Credit Union
Central MO Foster and Adoption Care
MO Dept. of Family and Children Services
First Choice Employment
American Cancer Society
Habitat for Humanity

Veterans' Services
Dept. of Workforce Development
Dept of Health and Human Services
Common Ground
State Tech
River Region Credit Union
Helping Hands
Capital City Diaper Bank
Dept. of Elementary and Secondary Education
United Way
Landmark Recovery
Jefferson City Hands Together

XV. FSS Portability

A. Portability in initial 12 months

While JCHA is not required to allow FSS participants to exercise portability within the initial 12 months after signing a CoP, it is the policy of JCHA to allow for portability within this period to the extent feasible.

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 JCHA's FSS Program unless JCHA 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 JCHA is able to receive an incoming family from another jurisdiction into the FSS Program, JCHA 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.

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, FSS Program staff 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, JCHA will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR § 984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS Program.

XVI. 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 |

XVII. Definitions

The Housing Authority of the City Jefferson, Missouri, is referred to as "JCHA", "PHA", "HA", and "Housing Authority" throughout this document.

"Family" is used interchangeably with "Resident", "Applicant" or "Participant" and can refer to a single person family.

Definition of Terms

The following are definitions of terminology used throughout this document.

Acronyms

| | |
|---------------|---|
| ACC | Annual Contributions Contract |
| CFR | Code of Federal Regulations. Commonly referred to as "the regulations." |
| FSS | Family Self-Sufficiency |
| FYI | Foster Youth to Independence |
| PHA/HA | Public Housing Authority/Housing Authority |
| HQS | Housing Quality Standards |
| HUD | Department of Housing and Urban Development |

| | |
|-------------|--|
| ITSP | Individual Training and Services Plan |
| JCHA | Housing Authority of the City of Jefferson Missouri is referred to as the JCHA throughout this document. |

Admissions and Continued Occupancy Plan (ACOP). The HUD required written policy of the JCHA governing its administration of the Public Housing Program.

Administration Plan (Admin Plan). The HUD required written policy of the JCHA governing its administration of the HCV Program.

Applicant or applicant family. A family that has applied for admission to a program, but is not yet a participant in the program.

Annual Contributions Contract (ACC). A written contract between HUD and JCHA. Under the contract, HUD agrees to provide funding for operation of the program, and JCHA agrees to comply with HUD requirements for the program.

Contract of Participation (CoP). HUD form 52650. A five-year contract between the Head of Household and the JCHA. The Contract of Participation must include an Individual Training and Services Plan (ITSP). The effective date of the Contract of Participation is the first day of the month following execution of the contract by the Head of Household and the JCHA.

Essential Service. A service which must be available before the family can take advantage of other available services. Such things as transportation to job or school, basic literacy training or job seeking workshops might be considered essential services.

Family Self Sufficiency Program (FSS). The program offered by JCHA to promote the self-sufficiency of assisted families, including the provision of supportive services.

Head of Household. The Head of Household is the person who assumes legal and financial responsibility for the household and is listed on the Housing Choice Voucher (HCV) Program or HCV application as Head.

Housing Choice Voucher Program (HCV) Agency (PHA). Any state, county, municipality, or other governmental entity or public body, which is authorized to administer the Housing Choice Voucher Programs (or an agency or instrumentality of such an entity).

HUD Requirements. HUD requirements for the Housing Choice Voucher and FSS Programs. HUD requirements are issued by HUD headquarters as regulations, Federal Register notices or other binding program directives.

Participant. A family that has been admitted to JCHA's FSS Program. The family becomes a participant on the effective date of the Contract of Participation.

Program Receipts. HUD payments to the JCHA under the consolidated ACC, and any other amounts received by the JCHA in connection with the Housing Choice Voucher Program.

Public Assistance. Welfare or other payments to families or individuals based on need, which are made under programs funded, separately or jointly, by Federal, State, or local governments.

Seeking Employment: Activities such as looking for a job, applying for work, going to job interviews and following-up on employment opportunities. Monthly progress reports must be made to the Family Self-Sufficiency Coordinator.

Suitable Employment: Employment that will eventually make the family independent of the Housing Choice Voucher subsidy.

Tenant Rent. The amount payable monthly by the family as rent to the HA or, in the HCV Program, to the landlord.

Utility Allowance. When the cost of utilities (except phone) is not included in the Contract Rent but is the responsibility of the tenant, the JCHA estimates the cost of a reasonable consumption of utilities for an assisted unit. The utility allowance is only applicable to the portion of utilities paid by the tenant.

Welfare Assistance. Income assistance from Federal or State welfare Programs, including assistance provided under TANF (formerly AFDC) and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, childcare or other services for working families.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

October 6, 2022

Ms. Michelle Wessler
Executive Director
Housing Authority of the
City of Jefferson
1040 Myrtle Avenue
Jefferson, MO 65109

Dear Ms. Koenig:

Thank you for submitting your Family Self-Sufficiency (FSS) Action Plan. The Office of Public and Indian Housing staff reviewed your agency's Action Plan and determined it meets the requirements of the Final Rule. Therefore, your FSS Action Plan is approved.

If you have questions or concerns, please contact me at 314-418-5230 or
Craig.C.Dobson@hud.gov.

Sincerely,

Craig Dobson
Public Housing Director
St. Louis Field Office

