

CHATTANOOGA HOUSING AUTHORITY

FAMILY SELF-SUFFICIENCY (FSS) ACTION PLAN

Effective Date: 11/01/2023

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801 N. Holtzclaw Ave.
Chattanooga, TN 37404

Chattanooga Housing Authority (CHA) Family Self-Sufficiency (FSS) Action Plan

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Section I – INTRODUCTION AND MISSION STATEMENT

The Chattanooga Housing Authority (CHA) is pleased to have the opportunity to participate in the Family Self-Sufficiency Program (FSS) offered by the Department of Housing and Urban Development (HUD) and has the capacity to administer a minimum of 50 and up to 75 FSS slots. The CHA welcomes the opportunity to encourage and assist participants in increasing earned income, thereby increasing the ability for families to become economically independent. Both the delivery of services and planning shall be coordinated with various community resources in an effort to deliver the highest quality available assistance to participants.

The mission of the CHA's FSS Program is to match families participating in the Housing Choice Voucher Program (HCVP) and the Low Income Public Housing (LIPH) Program, with existing community services. The program aims to help the FSS program participants achieve economic self-sufficiency and assist them in all manners possible that shall enable them to become economically self-sufficient. The FSS Program is governed by HUD Program 24 CFR Parts 887 and 984. All mandatory requirements of this regulation are incorporated by reference into this FSS Action Plan.

Section II – PROGRAM OBJECTIVES

The CHA's FSS Program enables families to advance toward economic independence by empowering them to:

- Increase their earned income
- Develop their financial expertise
- Reach their financial goals

Section III – PROGRAM SIZE AND CHARACTERISTICS

3.1 Family Demographics

The table below describes the CHA's HCVP and LIPH. The data may be used at a later date to help the Program Coordinating Committee (PCC) identify supportive services and needs of expected FSS participants.

The CHA's FSS Program will serve the following housing assistance programs:

- HCVP: HCV Homeownership

- HCVP: Project-Based Vouchers (PBV)
- HCVP: Tenant-Based Vouchers
- HCVP: Emergency Housing Voucher (EHV), Family Unification Program (FUP), Veteran Affairs Supportive Housing (VASH)
- LIPH

	Housing Choice Voucher Program		Low Income Public Housing	
Demographics	Total Families	Percent of Total	Total Families	Percent of Total
Household				
Total Households	2,975	----	1,300	----
Total Residents	7,700	----	2,490	----
Members in Family				
1-2	1,686	57%	980	75%
3-5	443	15%	299	23%
6 or more	165	6%	22	2%
Race				
African American/Black	6,396	83%	2,180	88%
White	1,323	17%	303	12%
Other			8	0%
Ethnicity				
Hispanic or Latino	65	1%	32	1%
Not Hispanic or Latino	7,643	99%	2,455	99%
Unknown	----	----	3	0%
Disability Status				
Household with a disabled member	1,032	35%	510	39%

3.2 Supportive Services Needs

The FSS Coordinator shall encourage service coordination and referrals to appropriate local, public and private resources (24 CFR 984.103). The below list of FSS activities and supportive services is based on an assessment of services provided to past FSS, ROSS, and UMP participants.

- **Child care:** On an as-needed or ongoing basis, a type that provides sufficient hours of operation and serves an appropriate range of ages.
- **Transportation:** Needed by a participating FSS family member to access available services, commute to their place(s) of employment, medical facilities, schools, etc.
- **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.
- **Employment:** Job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP.
- **Personal Welfare:** Substance/alcohol abuse treatment and counseling, and health, dental, mental health, and health insurance services.
- **Household Management:** Training in household management.
- **Homeownership and housing counseling:** Homeownership education and assistance and housing counseling.
- **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.
- **Other Services:** Any other services and resources, including case management, reasonable accommodations, optional services, and specialized services for individuals with disabilities, that the CHA may determine to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications shall be made for individuals with disabilities consistent with applicable federal, state, and local civil rights and nondiscrimination laws.

The FSS Coordinator shall schedule regular check-ins with the FSS participants to monitor and document their progress, adjust the ITSP, and provide additional services and referrals. The FSS Coordinator shall attempt to engage with each participant once every quarter of the calendar year. It is the responsibility of the participant to collaborate in the scheduling of progress meetings and properly communicate their availability. Failure to do so is a violation of the participant's CoP and may result in termination from the FSS Program.

3.3 Estimate of Participating Families

The CHA no longer has mandatory slots in its FSS Program. The program size reflects the number of eligible FSS families who can reasonably be expected to receive supportive services under the FSS Program, based on available and anticipated Federal, State, Local, and private resources. CHA has been funded for one FSS Coordinator, and can maintain a program size of at least 50 participants drawn from the HCVP and LIPH.

Historically, the CHA has enrolled approximately 10 new families into the FSS Program each year. The CHA expects to be able to provide FSS services to a minimum of 250 families over a five-year period. Effective date of this Action Plan, the CHA expects to be able to serve up to 75 families in the FSS Program at any one time.

3.4 Other Self-Sufficiency Programs

The CHA administers three additional HUD self-sufficiency programs: Emergency Housing Voucher (EHV), Family Unification Program (FUP), Veteran Affairs Supportive Housing (VASH), Resident Opportunities and Self-Sufficiency (ROSS). All participation is voluntary. EHV has the capacity to serve up to 40 households, FUP has the capacity to serve up to 70 households, VASH has the capacity to serve up to 140 households, and ROSS has the capacity to serve 110-165 individuals for three LIPH sites.

Additionally, the CHA administers an Upward Mobility Program (UMP) that has the capacity to serve up to 275 households and tracks all adults in these households. UMP participation is mandatory, unless the participant is designated exempt due to elderly and/or disabled status.

Name of Program	Number of Eligible Participants Per Year
EHV	2
FUP	2
ROSS	2
VASH	1

UMP	3
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Section IV – FAMILY SELECTION PROCEDURES

4.1 Waiting List

The FSS Coordinator shall initiate and maintain an FSS waitlist at all times. Individuals are placed on and selected from the waitlist in the order in which their waitlist applications were received (date and time) (24 CFR 984.203(b)). All potential FSS participants shall fill out and submit a waitlist application to the CHA to secure their slot in the program. The FSS Coordinator shall review the FSS waitlist on a monthly basis, and update information/applicant status as needed. The FSS waiting list is opened and closed in response to the number of applicants on the lists and the anticipated availability of FSS slots.

Individuals shall be removed from the waitlist if they receive a slot in the FSS Program, decline a slot, request to be removed, or are non-responsive after three outreach attempts. On the third attempt to reach the waitlist applicant, the FSS Coordinator shall inform the individual that if they do not respond within 2 business days, they shall be taken off the waitlist.

Individuals are deemed as ineligible for FSS if they are currently under a repayment agreement and/or owe money to CHA.

4.2 Admissions Preferences

The CHA's FSS Program has not adopted any admissions preferences. Families will be selected based on the time and date their FSS waitlist application is received.

4.3 Screening for Motivation

The CHA will not adopt any motivational screening factors to measure the family's interest and motivation to participate in the FSS Program.

4.4 Compliance with Nondiscrimination Policies

It is the policy of the CHA to comply fully with existing federal and state laws protecting the individual rights of applicants, residents, and/or staff and any laws subsequently enacted. Such laws include Title VI of the Civil

Rights Act of 1964 and the implementing regulations at 24 CFR Part 1; Title VIII of the Civil Rights Act of 1968 (as amended by the Fair Housing Amendment Act of 1988) and the implementing regulations at 24 CFR Parts 100,108,110, and 121; Executive Order 11063 on Equal Opportunity in Housing and the implementing regulations at 24 CFR Part 107; Section 504 of the Rehabilitation Act of 1973 and the implementing regulations at 24 CFR Part 8; the Age Discrimination Act of 1975 and the implementing regulations at 24 CFR Part 146; Title II of the Americans with Disabilities Act and the implementing regulations at 28 CFR Part 35; the Violence Against Women Act of 2005 as amended by the Violence Against Women Reauthorization Act of 2013 and the implementing regulations at 24 CFR 5.2001 et. seq. and 24 CFR 960.103; laws, Executive Orders and regulations recited at 24 CFR 5.105(a); and the Tennessee Landlord and Tenant Act.

The CHA shall not discriminate because of race, color, sex, religion, age, handicap, disability, ancestry, national origin, ethnicity, familial or marital status, children, sexual orientation (homosexuality, heterosexuality, and/or bisexuality), gender identity (actual or perceived gender-related characteristics) or veteran status in the leasing, rental, sale or transfer of units, buildings, and related facilities, including land that it owns or controls. The CHA shall affirmatively further fair housing in the administration of its Program.

The FSS Coordinator 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 Coordinator 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 Grievance Procedures, Section X). At all times, the CHA will select families for participation in the FSS Program in accordance with FSS Regulations and HUD guidelines.

Procedures for participants who require reasonable accommodations can be found in Section XIII of this Action Plan.

4.5 Re-enrollment of Prior FSS Participants

Previous participants who were exited from the program unsuccessfully or voluntarily may have the opportunity to re-enroll 12 months after exiting. Re-

enrollment is limited to one-time per participant. Previous participants do not take priority over new participants during the selection or enrollment process.

Previous participants are not eligible for re-enrollment if:

- The participant has successfully graduated from the program and collected an excess of \$3,000 of escrow, minus any money owed to the CHA.
- The participant was terminated for non-compliance from HCVP or LIPH programs, commits fraud, bribery, or any other corrupt or criminal activity in connection with any of the CHA housing programs.

4.6 Head of FSS Family

CHA households currently living in HCVP and LIPH programs are eligible for enrollment. Families with Homeownership Vouchers may enroll in FSS and families that transition into Voucher Homeownership may remain in FSS. All household members of the FSS family shall be in compliance with their lease.

Pursuant to HUD regulations, any adult member of the household may enroll in the FSS Program (24 CFR 984.303(a)). The head of the FSS family means that a designated adult family member of the FSS family has signed the Contract of Participation (CoP) (24 CFR 984.103). The head of the FSS family may, but is not required to be, the head of the household for the purposes of determining income eligibility and rent (24 CFR 984.303).

- One CoP per family
- Individual Training Service Plan (ITSP) for as many members of the family who wish to participate
- Escrow goes to the person who signs the CoP

If the head of the FSS family changes, the current head, and the upcoming head shall both sign a form regarding the following:

- Acknowledging that the transfer of the head of the FSS household is changing and consensual.
- The new head of the FSS family inherits all of the money in the escrow account.
- The previous head of the FSS family no longer has any right to the money accrued in the escrow account.
- The new head of the FSS family may modify the ITSP goals.
- The CoP expiration date does not change unless a contract extension is granted.

- If the head of the FSS Family is incapacitated and/or dies, an adult family member may assume the position as the head of the FSS family. If no adult family member is willing or able to act as the head of the FSS family, the executor/administrator of the estate will need to request and submit a waiver to the FSS Coordinator for final disbursement of escrow.

Section V – OUTREACH

The CHA shall take measures to equally educate all participants and residents about the FSS Program. These efforts may include the distribution of marketing materials and applications at the time of a lease signing, briefings, and relocation meetings, etc., and distribution of information to social service providers and others who may work/serve the CHA's participant/resident population.

Outreach and marketing efforts are vital in communicating the value of the FSS Program to the CHA residents. As such, the CHA is responsible for the following:

- Review and update, as necessary, the FSS brochure, flyers, handouts, and all other marketing materials.
- Review and update, as necessary, CHA's website to have all marketing materials, the FSS waitlist application, the FSS Coordinator's contact information, and all other relevant FSS forms and information.
- Ensure that all of the CHA sites have accurate and up-to-date marketing materials, waitlist application, etc.

The CHA may also utilize and collaborate with focus groups, resident councils, case managers, CHA staff, etc. to recruit residents to the FSS Program.

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 CHA will account for the needs of persons with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible who wish to participate are able to do so.

Section VI – FSS ESCROW ACCOUNT AND OTHER INCENTIVES FOR PARTICIPANTS

The CHA shall manage the escrow accounts in accordance with HUD regulations and in conjunction with the CoP. The FSS escrow savings account serves two purposes. The first is to act as the primary incentive for participants to increase their earnings. The second is to provide a unique opportunity for FSS participants to build substantial savings.

The CHA is responsible for maintaining the escrow account of FSS participants. The amount of escrow in the account grows as the earnings of the FSS participant increases. The CHA converts increases in rent for FSS participants, due to increases in their earned income, into escrow savings. At enrollment, the most recent examination of rent shall be used to establish the baseline annual earned income. In calculating baseline annual earned income, all applicable exclusions of income shall be applied, except for any disregarded earned income or other adjustments associated with self-sufficiency incentives that may be applicable to the determination of annual income. If an FSS family has income disregarded due to EID (which shall sunset with HOTMA), or any other self-sufficiency income disregard, that income is included in the baseline. Monthly escrow credits can continue to grow up to 80% Area Median Income (AMI).

The CHA shall deposit the FSS escrow account funds of all families participating in an FSS Program into a single-interest bearing depository account. Escrow is deposited each month regardless of whether the family pays rent or pays it on time (24 CFR 984.305(a)).

The CHA shall provide an annual report to the FSS participant of their escrow account. The report shall include the original balance, changes during the reporting period, deductions made to the account, interest earned, and total account value at the end of the period (24 CFR 984.305(a)(3)).

6.1 Additional Incentives

The main incentive offered to all participants is the ability to build escrow funds during participation in the FSS Program. The CHA shall distribute all earned escrow money to eligible participants (those who have completed all goals outlined on ITSP and are free of welfare assistance at the time of CoP completion) minus any money owed to the CHA.

Other incentives include, but are not limited to, connections to community partnerships and financial benefits that the CHA may provide to FSS participants from forfeited escrow funds from previous FSS participants (24 CFR 984.305(f)).

There may be times when these types of incentives are not available. The CHA is not obligated to provide any incentives other than the escrow savings account.

6.2 Interim Disbursements

The CHA permits FSS participants to make an interim withdrawal up to 25% of the total amount deposited into the escrow account and interest earned. Interim withdrawals can only be made once per year after the first 12 months. Any exceptions to this shall be approved by the Resident Engagement Administrator. All interim withdrawals shall be directly related to helping the participant meet all goal(s), as outlined in their ITSP.

Participants may be required to be enrolled in one or more programs or courses that directly relate to their interim disbursement. Requests shall be considered on a case-by-case basis. Participants who request an interim withdrawal must fill out an interim disbursement request form. Once received, the FSS Coordinator will review the request and submit it to the Resident Engagement Administrator for approval. Requests over \$250 shall be reviewed by the Department Director for approval. Fund requests over \$10,000 shall be reviewed by the Executive director for approval. Limitations regarding eligible activities are listed below.

Examples of justifiable withdrawals include, but are not limited to:

- Completion of education/job training related goals such as money for tuition, books, manuals, subscriptions, equipment, etc.
- Helping pay for a car, repairs on a vehicle that is required for work, or a bus pass.
- Paying off old debt to improve credit.
- Fees and start-up expenses for small business development.
- Down payment toward the purchase of a home.

Examples of non-justifiable interim disbursements include, but are not limited to:

- Paying for the participant's portion of rent or debt owed to CHA.
- Vacation/leisure activities.
- Anything that can be provided by referring the participant to a community resource or program.

The FSS participant shall provide documentation/verification of any money needed in order for the CHA to process the withdrawal. Examples include certificates, proof of purchase, statements of verifications, pay stubs, bank

statements, etc. The CHA, in its sole discretion, will determine if a document that a participant provides is sufficient.

The Resident Engagement Administrator shall approve the request. The check usually shall be issued to both the participant and/or business that shall be accepting the participant's payment for the reasons stated above. Any requests that exceed 25% of the escrow balance and/or are requested more often than once a year shall be reviewed and approved/denied at the discretion of the Resident Engagement Administrator.

6.3 Uses of Forfeited Escrow Funds

The funds accrued by the participant will be forfeited if:

- The participant exits the FSS Program without completing ITSP goals.
- The participant is terminated due to non-compliance.
- The participant commits fraud and/or fails to report timely any change in household composition, income and/or assets. See Section 6.5 for additional details regarding Participant Fraud Policy.
- The CoP is declared null and void.
- The participant ports to another PHA.

At CHA's sole discretion, a participant who commits fraud or fails to timely report income, and who has entered into a written repayment agreement, may request a disbursement from the forfeited escrow funds so long as the participant is not in default under the fraud repayment agreement.

Pursuant to 24 CFR 984.305(f), all forfeited escrow shall go into an account to be used for the benefit of current FSS families in good standing. Forfeited FSS escrow funds may be used anytime during the term of the participant's CoP. At the discretion of the FSS Coordinator, forfeited escrow funds may be considered in lieu of an interim escrow disbursement and will follow interim disbursement procedures.

Funds may be used, but are not limited to, the following eligible activities:

- Transportation, childcare, training, test fees, employment preparation costs, and other cost-related expenses or activity that go towards achieving obligations outlined in the CoP.
- To act as an incentive for completing classes, training, or other goal-related activities.
- Family and household essentials.

- Training for FSS Program Coordinator(s).
- Other eligible activities as determined by HUD regulations .

Funds may not be used for the following:

- Salary and fringe benefits of the FSS Program Coordinator(s).
- General administrative costs for the FSS Program.
- Housing assistance payments (HAP) expenses or public housing operating funds.
- Any other activities determined ineligible by HUD.

6.4 Final Disbursement of Escrow

A participant is eligible to receive a full disbursement of their FSS escrow balance, minus any debt owed to the CHA, upon successful completion of the CoP and completion of the ITSP goals. FSS participants have no income tax liability for funds held in the account or for payments made at the completion of the CoP.

If the head of the FSS Family is incapacitated and/or dies, an adult family member may assume the position as the head of the FSS family. If no adult family member is willing or able to act as the head of the FSS family, the executor/administrator of the estate will need to request and submit a waiver to the FSS Coordinator for final disbursement of escrow.

6.5 Participant Fraud Policy

Should a participant commit fraud and/or fail to report timely any change in household composition, income and/or assets while accruing escrow before the January 2022 board resolution, Resolution 2022 - 003, the amount of escrow monies deposited and interest accrued during the time a participant was committing fraud will be subtracted from the participant's escrow balance. The remaining balance should reflect the time the participant accrued escrow while not committing fraud. If the participant commits fraud at any point after January 2022, their full escrow balance as of the date the fraud is identified will be forfeited.

At CHA's sole discretion, a participant who commits fraud or fails to timely report income may be terminated from the FSS Program for a CoP violation or the participant may be allowed to continue in the FSS Program. Such decisions are made on a case-by-case basis in the light of the participant's entire history with

CHA. If CHA determines that a participant may remain on the FSS Program, the participant will begin accruing an escrow balance from that point in time forward. To receive any escrow balance amounts, the participant must abide by the rules and obligations outlined in the CoP, Outcome Requirements Form, FSS Action Plan, and HUD regulations that factor into whether they are eligible to receive their remaining escrow balance.

6.6 Debt Policy

The CHA may not collect or hold participants accountable for any debt over 10 years old, per Tennessee code § 28-3-109 (2017). Participants that are indebted to the CHA shall agree to and complete a “Repayment Agreement.” The participant shall abide by all terms stated within both documents and make regular payments on debt until debt is completely paid off. Repayment of said debt shall become a part of the client’s ITSP. Failure by the participant to make agreed upon payments shall be equivalent to a failure to complete a goal and may result in termination of participation in the FSS Program. Any participant that is still indebted to the CHA upon successful completion of all other goals in the ITSP shall have all monies owed to the CHA deducted from their escrow monies before disbursement of any funds to participant.

Residents that apply to the FSS Program and are indebted to the CHA at the time of application shall be allowed to become an FSS participant provided requirements of participation are met and the participant agrees to abide by above stated rules regarding debt.

Section VII – FAMILY ACTIVITIES AND SUPPORTIVE SERVICES

Supportive Service	Specific Service	Source/Partner
Child Care	<ul style="list-style-type: none"> • Infant Care / Toddler Care • Preschool Care • Afterschool Care • Homework Assistance 	The Bethlehem Center, state and local government resources, local nonprofits.

Transportation	<ul style="list-style-type: none"> • Bus passes 	CARTA.
Education	<ul style="list-style-type: none"> • High School Equivalency/GED • English as a Second Language • Post-secondary certificates • Advanced Degrees 	Local higher education providers, Department of Labor and Workforce career center, other appropriate nonprofits.
Skills Training	<ul style="list-style-type: none"> • Training in Executive Function • Basic Skills Training • Emerging Technologies Training • Biomedical Training (including CNA, phlebotomy, x-ray and other tech, etc.) • On-the-Job Training • Apprenticeships • Skilled Labor training 	Impact 1!, other local vocational educational providers, and the Department of Labor and Workforce career center.
Job Search Assistance	<ul style="list-style-type: none"> • Resume Preparation • Interviewing Skills • Dress for Success • Workplace Skills • Job Development • Job Placement 	Department of Labor and Workforce career center.
Micro and Small Business Development	<ul style="list-style-type: none"> • Small business development services • Small business Mentoring • Entrepreneurship Training 	Launch and Co.Lab.

Health/Mental Health Care	<ul style="list-style-type: none"> • Alcohol and Drug Abuse Prevention • Alcohol and Drug Abuse Treatment • Primary care • Dental services • Mental Health Services • Health Insurance Advising 	Hamilton County Health Department and other nonprofits.
Crisis Services	<ul style="list-style-type: none"> • Crisis Assessment • Crisis Intervention • Crisis Management • Crisis Resolution 	Centerstone Chattanooga and Johnson Mental Health Center.
Child/Adult Protective Services	<ul style="list-style-type: none"> • Needs Assessment • Case Planning • Information Referral 	Department of Children's Services and Department of Adult Protective Services.
Household Management	<ul style="list-style-type: none"> • Training in Household Management 	CHA.
Homeownership Preparation	<ul style="list-style-type: none"> • Homeownership Education • Housing Counseling • Down Payment Assistance • Other Homeownership Assistance 	Chattanooga Neighborhood Enterprise(CNE), Habitat for Humanity.

Financial Empowerment	<ul style="list-style-type: none"> • Financial education • Financial coaching • Banking services • Training in money management 	CHA, Department of Labor and Workforce career center, CNE, and Operation HOPE.
Individual Development Accounts	<ul style="list-style-type: none"> • Matched Savings Accounts 	Local banks and nonprofits.
Legal Services	<ul style="list-style-type: none"> • Legal Services 	Legal Aid.
Debt Resolution & Credit Repair	<ul style="list-style-type: none"> • Assistance negotiating the resolution of past-due debt 	Operation HOPE.
Other:	<ul style="list-style-type: none"> • Other services as needed 	Identified partners PCC and other partnerships.

Section VIII– METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS AND DELIVERING APPROPRIATE SUPPORT SERVICES

8.1 Identifying Family Support Needs

The FSS Coordinator shall conduct a needs assessment upon the first meeting with the participant. The assessment shall help develop the ITSP and determine which supportive services are needed to help the participant achieve the goals outlined in the ITSP. Common goals, include but are not limited to:

- Debt management
- Credit improvement
- Earning a GED, post-secondary, or technical degree

- Enhancing job-related skills
- Finding employment/new job where they earn more money
- Homeownership

At each quarterly meeting, the participant and FSS Coordinator shall review the participant's progress in achieving goals and adjust the services as needed.

8.2 Delivering Appropriate Support Services

All families who participate in the FSS Program will be assigned an FSS Coordinator who will provide coaching services to help each participating family to:

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

8.3 Transitional Supportive Service Assistance

No assistance or referrals will be available to families who have completed their CoP contracts.

Section IX– CONTRACT OF PARTICIPATION (CoP)

9.1 Form and Content of Contract

The CoP outlines the rights and responsibilities of the FSS participant and the CHA, and the participant's ITSPs. It shall be signed by the head of FSS Household and the CHA representative. Additional family members may also have an ITSP. The FSS participant, and all family members that elect to participate, shall be required to fulfill those obligations and goals to which the participating family has committed itself under the CoP.

- The start date of the CoP is the first day of the month following the date in which the FSS family and the CHA executed the contract (24 CFR 984.103).
- The end date of the CoP is 5 years after the first re-examination of income after the execution date of the contract (24 CFR 984.303(c)).

9.2 ITSP Goals

The CoP shall incorporate the ITSP for each participant. HUD-52650 is the HUD-provided form for the CoP and ITSP. It establishes specific goals that the participant wants to accomplish by the time their CoP expires. Every ITSP shall include two HUD-required goals that shall be achieved before the participant can graduate and receive their full escrow. Both of the required goals are briefly discussed below.

- Free of welfare assistance before the expiration of the term of the CoP, including any extensions thereof (24 CFR 984.303(b)(2)).
- The head of the FSS household shall have suitable employment.

9.3 Determination of Suitable Employment

Per HUD regulation, (24 CFR 984.303(4)(iii)), the determination of what suitable employment is defined as will be made by the CHA. Employment as outlined in the ITSP of the CoP and is based on the skills, education, job training, and receipt of other benefits of the household member, and based on available job opportunities within the jurisdiction served by the CHA.

9.4 CoP Term and Extensions

Every CoP is originally executed for five years from the date of the first reexamination of income after the date of CoP execution. If a participant does not achieve all goal(s) within five years, they can request up to two, one-year extensions. A request for an extension shall be submitted to the CHA, in writing, at least one month before the participant's contract expires.

Per HUD regulation 24 CFR 984.303(d), an extension of the CoP may occur for good cause, as defined as:

1. Circumstances beyond the control of the FSS family that impede the family's ability to complete the CoP obligations, such as a serious illness or involuntary loss of employment;

2. Active pursuit of a current or additional goal that shall result in the 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.); or
3. Any other unique circumstance that the CHA determines to warrant an extension, as long as the CHA is consistent in its determination as to which circumstances warrant an extension.

9.5 Completion of the Contract

FSS participants are eligible to graduate from the program and receive their full amount of accrued escrow when they have completed all of their obligations under the CoP, including the completion of their ITSPs, on or before the contract expires. These obligations include two required goals of suitable employment for the head of the FSS household and being free from welfare assistance before the expiration of the term of the CoP, including any extensions thereof (24 CFR 984.303(b)(2)).

- **Suitable employment:** Employment as outlined in the ITSP of the CoP and is based on the skills, education, job training, and receipt of other benefits of the household member, and based on available job opportunities within the jurisdiction served by the CHA (24 CFR 984.303(b)(4)(iii)).
- **Welfare assistance:** (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 (24 CFR 984.103).

FSS participants must provide documentation verifying that they completed their goals. A combination of self-certification and third-party verification will be acceptable to documentation of completion of ITSP goals. This could include certificates, proof of purchase, statements of verifications, pay stubs, bank statements, etc. The CHA, in its sole discretion, may determine if a document that a participant provided is sufficient.

FSS participants may graduate from the program early, without penalty, if goals have been completed. A participant may elect to identify new goals and extend participation in the program. If a participant has met all goals and does not choose to identify new goals, then the participant may receive the amount in the

family's FSS escrow account in excess of any amount owed to the CHA by the participant (24 CFR 984.305(c)(2)(i)).

9.6 Modification

The ITSP may be modified at any time so long as the goals are realistic for the participant to complete within the time of their contract. This is to ensure flexibility for the participant and reflect changing circumstances and interests. If a participant completes all goal(s) before the end of their contract, they may modify their ITSP to add another goal that they can realistically achieve within the time of their CoP (24 CFR 984.303(f)).

9.7 Consequences of Non-Compliance with the Contract

If a participant is deemed to be in non-compliance with the CoP, they may be at risk of termination from the FSS Program. See policies on Involuntary Termination in Section 10.1.

Section X – PROGRAM TERMINATION, AVAILABLE GRIEVANCE PROCEDURES, AND WITHHOLDING OF SERVICES

10.1 Involuntary Termination

The CHA may involuntarily terminate a participant's involvement in the program for the following reasons:

- If the head of the FSS family leaves their household/rental assistance program without transferring the head of the FSS family status to another household member.
- The participant is evicted from their HCVP or LIPH rental assistance program.
- A participant fails to honor the terms of the CoP.
- Any other act deemed inconsistent with the purpose of the FSS Program, in the sole discretion of the CHA.
- If the FSS family moves outside the jurisdiction of the CHA.

10.2 Voluntary Termination

The CHA may voluntarily terminate a participant's involvement in the program for the following reasons:

- Mutual consent of both parties.
- The participant withdraws from the FSS Program.

10.3 Termination with Escrow Disbursement

The CoP shall be terminated with FSS escrow disbursement when:

- Services that CHA 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 CHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- The participant is found guilty of committing fraud, but all fraud was committed prior to CHA's January 2022 board resolution, Resolution 2022 - 003. See Section 6.5 for additional details on the Participant Fraud Policy.

10.4 Grievance Procedures

Applicants to and participants of the FSS Program may file a grievance for any decision involving termination from the FSS Program, denial of FSS participation, escrow monies forfeited and withdrawal of FSS Waitlist Application. Any such grievance shall be processed in accordance with the HCVP Administrative Plan, Admissions and Continued Occupancy Policy (ACOP).

10.5 Withholding of Services

The CHA has the discretion to withhold services when a participant fails to comply with completion of the FSS Outcome Requirements, which shall be used to evaluate the effectiveness of the program outcomes. The failure of the client to meet these obligations may result in the CHA's withholding of supportive services to the client and/or possible termination from the FSS Program.

A participant and/or family members fail to comply with the terms of the lease and family obligations if applicable, and become independent from welfare assistance before the expiration of the term of the CoP, including any extensions thereof (24 CFR 984.303(b)(2)).

The FSS head of household shall seek and maintain suitable employment after completion of job training/educational program(s) as listed in the ITSP.

Section XI – ASSURANCE OF NON-INTERFERENCE

Participation in the FSS Program is voluntary. No individual or family that chooses not to participate, is terminated, or successfully completes the FSS Program shall be discriminated against in any way including denial, delay or termination of HCVP and/or LIPH lease termination.

Section XII – TIMETABLE

The CHA has provided direct oversight and administration of the FSS program since 2008, and is dedicated to meet all deadlines and requirements for program implementation. The CHA shall continue to provide its residents with supportive services while adapting to and complying with current and future HUD regulations and subsidies.

Section XIII – REASONABLE ACCOMODATIONS, EFFECTIVE COMMUNICATIONS, AND LIMITED ENGLISH PROFICIENCY

13.1 Requests for Reasonable Accommodations

The CHA shall make reasonable accommodations as required by law for handicapped/disabled persons to promote equal access to and participation in the Program. Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25 and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because the CHA's facilities are inaccessible to or unusable by persons with disabilities, or because the CHA's policies and/or procedures, lease or other provisions of law so provide.

The CHA cannot refuse to make a reasonable accommodation in rules, policies, practices or services when such accommodation may be necessary to afford a person with a physical or mental impairment equal opportunity to use and enjoy a CHA apartment, including public and common use areas.

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 on CHA's website.

13.2 Requests for Effective Communications

The CHA, in administering all public and assisted housing programs, is committed to ensuring that applications, residents, employees, contractors, and other members of the public with disabilities have an effective means to communicate. When requested, the CHA employees, agenda, contractors, and private management companies, shall furnish appropriate auxiliary aids and services to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of the programs, services, and activities conducted by the CHA. All notifications, including approvals or denials of requests for effective communication referenced in the Effective Communications Policy, will be provided in an alternate format, upon request. The policy can be found as Attachment B in the CHA Agency Plan, available on the CHA's website.

13.3 Limited English Proficiency

It is the policy of the CHA to take reasonable steps to ensure that people with Limited English Proficiency (LEP) have meaningful access to the CHA's programs, services and activities. This policy complies with the HUD's "Final Guidance to Federal Financial Assistance Recipients Regard Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficiency Persons" dated January 22, 2007. For more information, see the LEP policy available on CHA's website.

Section XIV – COORDINATION OF SERVICES

14.1 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.

14.2 Program Coordinating Committee (PCC)

Pursuant to HUD regulation (24 CFR 984.202(a)), the CHA shall establish a PCC whose function is to assist the CHA in securing commitments of public and private resources for the operation of the FSS Program.

The PCC shall meet at least three times per year to ensure continued involvement and cooperation among all agencies involved. The PCC shall be a strong resource in implementing needed resource referral and supportive services to the FSS Program participants.

The PCC shall consist of:

- The FSS Coordinator
- One or more members from each of the CHA's rental assistance programs—HCVP and LIPH.
- Representative(s) from various CHA departments and resident council(s)
- Community partner, social services, and relevant public agency members.
Such as:
 - Tech Goes Home, CHI Memorial, Mental Health Cooperative, Signal Centers, American Job Centers, Chattanooga Neighborhood Enterprise.

Section XV – FSS PORTABILITY (Applicable to HCV Only)

15.1 Port-Out to Another PHA

If an FSS household ports-out to another PHA, the household will be terminated from the CHA's FSS Program. The CHA will not transfer the COP or any accrued FSS funds to the receiving PHA.

The CHA is not responsible for helping the participant find a PHA that has an FSS Program and accepts port-ins. However, the FSS Coordinator may provide a list of PHAs with FSS programs. The CHA is not responsible for initiating contact between the FSS participant and the PHA or ensuring the participant's slot in the receiving PHA's FSS Program.

15.2 Port-In from Another PHA

If an FSS household ports-in from another PHA to the CHA, the household's CoP will not be accepted and will be terminated. This does not limit the port-in from applying to the CHA's FSS Program and starting over with a new CoP.

Section XVI – DEFINITIONS

- **Baseline annual earned income:** The FSS family's total annual earned income from wages and business income (if any) as of the effective date of the FSS contract. In calculating baseline annual earned income, all applicable exclusions of income shall be applied, except *for* any disregarded earned income or other adjustments associated with self-sufficiency incentives that may be applicable to the determination of annual income (24 CFR 984.103).
- **Contract of Participation (CoP):** The contract entered into between an FSS family and CHA that sets forth the terms and conditions governing participation in the FSS Program. All Individual Training and Services Plans (ITSPs) are attached to the CoP (24 CFR 984.103). HUD-52650 is the HUD-provided form for the CoP and ITSP.
- **Current annual earned income:** FSS family's total annual earned income from wages and business income (if any) as of the most recent re-examination of income which occurs after the effective date of the FSS contract. In calculating current annual earned income, all applicable exclusions of income shall apply, including any disregarded earned income and other adjustments associated with self-sufficiency incentives or other alternative rent structures that may be applicable to the determination of annual income (24 CFR 984.103).
- **Effective date of Contract of Participation (CoP):** The first day of the month following the date in which the FSS family and the CHA entered into the CoP (24 CFR 984.103).
- **FSS family:** A family that resides in public housing or receives Section 8 assistance, and elects to participate in the FSS Program, and whose

designated adult member (head of FSS family) has signed the CoP (24 CFR 984.103).

- **FSS family in good standing:** An FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the PHA or owner; and is in compliance with the regulations in part 5 and chapters VIII and IX of this title regarding participation in the relevant rental assistance program (24 CFR 984.103).
- **Good cause:** (1) Circumstances beyond the control of the FSS family that impede the family's ability to complete the CoP obligations, as determined by the PHA or owner, such as a serious illness or involuntary loss of employment (24 CFR 984.303(d)).
- **Head of the FSS Family/Household:** The designated adult family member of the FSS family who has signed the CoP. The head of the FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent (24 CFR 984.103).
- **Individual Training and Services Plan (ITSP):** A written plan that is made by the FSS participant and the FSS Coordinator. The ITSP outlines the final and interim goals for the FSS participant, supportive services to be provided to the participant, activities to be completed by the participant, and the agreed upon completion dates for the goals and activities. The ITSP is attached to the CoP.
- **Participant(s):** The individual participating in the FSS Program.
- **Resident:** Persons and/or families that are currently and actively receiving rental assistance within the CHA's HCV or LIPH programs.
- **Suitable employment:** Employment as outlined in the ITSP of the CoP and is based on the skills, education, job training, and receipt of other benefits of the household member, and based on available job opportunities within the jurisdiction served by the CHA (24 CFR 984.303(b)(4)(iii)).
- **Welfare assistance:** (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 (24 CFR 984.103).
 1. Nonrecurrent, short-term benefits that:
 - a. Are designed to deal with a specific crisis or episode of need;
 - b. Are not intended to meet recurrent or ongoing needs; and,
 - c. 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.