



ACTION PLAN FOR THE FAMILY SELF-SUFFICIENCY PROGRAM

**Revised
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Introduction

The mission of the Lake Metropolitan Housing Authority (Lake MHA) is to advocate for, develop, and sustain affordable housing opportunities for the residents of Lake County. We support and encourage residents to attain self-sufficiency while maintaining a customer-centered focus. Therefore, Lake MHA is pleased to have the opportunity to administer the Family Self-Sufficiency Program (FSS) offered by the Department of Housing and Urban Development (HUD).

The purpose of Lake MHA's FSS Program is to offer families participating in Lake MHA's Housing Choice Voucher Program (including those receiving FUP, VASH, or Mainstream vouchers and those in the Homeownership Program), an opportunity to achieve economic and social independence. Lake MHA's objective is to promote local strategies that coordinate HCV rental vouchers with existing public and private resources to assist extremely low and very low-income families in becoming free of all government assistance.

Lake MHA welcomes the opportunity to encourage and assist clients in increasing their earned income thereby increasing their ability to become economically independent. Lake MHA will maintain inter-agency partnerships to achieve high quality comprehensive service in-house, in addition to outreach programs to ensure comprehensive service delivery. The delivery of services and planning for the FSS Program will be coordinated with various community resources to deliver the highest quality assistance available to clients.

The FSS Program will be administered by the FSS Coordinator. The FSS Coordinator will perform outreach, recruitment, and retention of FSS participants, work on goal setting, case management, and coaching of FSS participants, and track program performance. The FSS Coordinator will also work with community and service partners and meet regularly with the Program Coordinating Committee (PCC). The PCC will be composed of at least one Lake MHA representative (the FSS Coordinator), at least one HCV participant, and Lake MHA's community and service partners. The PCC's primary function is to secure commitments from public and private resources for the operation of the FSS Program within Lake MHA's jurisdiction, including assistance in developing the Action Plan and implementation of the Program.

Families agreeing to participate in the FSS Program must enter into a Contract of Participation (CoP) and an Individual Training and Service Plan (ITSP), which will specify the family’s responsibilities and goals. Lake MHA will create an escrow account for families participating in the FSS program when their earned income has increased since the effective date of their CoP and their rental amount has increased as a result of the income. Families that meet their interim goals identified in their ITSP may withdraw funds from their escrow account to pay for approved uses, such as college tuition, transportation, childcare, and other criteria established by Lake MHA. The CoP is set for a time period of five years, although Lake MHA may extend a CoP for up to an additional two years when “good cause” is demonstrated. The goal of the FSS program is to have families successfully complete their CoP and all ITSPs, which will result in disbursement of the family’s escrow account fund to the family.

This document amends the 2016 FSS Action Plan, in accordance with HUD’s May 17, 2022, final rule implementing the reauthorization of the FSS Program, passed as part of the Economic Growth, Regulatory Relief, and Consumer Protection Act in 2018 (codified, in relevant part, at 24 CFR Part 984). This revised Action Plan will serve as the permanent FSS Action Plan in accordance with 24 CFR § 984.201.

Family Demographics

The Lake MHA Housing Choice Voucher Program has 1534 awarded ACC units. At the time of this update (August 2022) 1203 units are leased. This total includes 22 families with Mainstream vouchers, 17 families with FUP vouchers, 15 families with VASH vouchers, 3 Homeownership Program families, and 9 families under portability billing arrangements.

Race and Ethnicity		Voucher Sizes		Elderly/Disabled Members		Income Bracket	
663	White	516	1 bed	82	Elderly/Non-Disabled	24	Low Income
527	Black	383	2 bed	491	Non-Elderly/Disabled	194	Very Low Income
53	Hispanic	233	3 bed	245	Elderly/Disabled	963	Extremely Low Income
3	American Indian	58	4 bed			8	Over 80% Income
1	Asian	3	5 bed				
		1	8 bed				

The characteristics of the families to participate in the FSS program are drawn from the demographics of current FSS participants (August 2022).

Race and Ethnicity		Voucher Sizes		Elderly/Disabled Members		Income Bracket	
5	White	1	1 bed	0	Elderly/Non-Disabled	0	Low Income
15	Black	8	2 bed	0	Non-Elderly/Disabled	4	Very Low Income
0	Hispanic	7	3 bed	0	Elderly/Disabled	16	Extremely Low Income
0	American Indian	4	4 bed			0	Over 80% Income
0	Asian						

The supportive service needs of families expected to be served include education and training, accelerated skills instruction, job placement, job retention, mentoring, homeownership counseling, financial coaching (including budgeting, banking, credit, debt, and savings), dental care, health care, and mental health care, and assistance paying for child care and transportation. This list of supportive service needs is based on experience with past FSS participants.

Estimate of Participating Families

The FSS Program at Lake MHA had an initial mandatory size of 130 slots. Mandatory slots are reduced as participants successfully complete the Program. At this time, Lake MHA has had 161 FSS graduates since its inception.

Based on the demographics listed above and the composition of the waiting list, Lake MHA estimates that most Lake MHA-assisted families could be reasonably expected to receive supportive services and benefit from the FSS Program. Lake County has a diverse number of supportive services available to families. Lake MHA 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.

In recent years, Lake MHA has been funded for one FSS coordinator. The minimum number of participants required to be served based on this funding is 25 participants each year. Lake MHA’s full-time FSS Coordinator will serve at least 25 participants and will strive to serve 50 families.

Eligible Families from Other Self-Sufficiency Programs

Lake MHA expects to enroll in FSS families from the self-sufficiency programs checked in the table below.

Name of Program	Check box if applicable	Number of families each year
Family Unification Program – Family	X	0-1
Family Unification Program – Youth	X	0-1
Foster Youth Initiative		
Resident Opportunity and Self-Sufficiency		
Jobs Plus		
Emergency Housing Voucher		
Veterans Affairs Supportive Housing	X	0-1
Other:		

Incentives to Encourage Participation

Case Management

An incentive to families participating in the FSS Program is the case management support provided by Lake MHA’s FSS Coordinator. The FSS Coordinator will help FSS families gain the skills, training, and education to become financially independent through goal setting and coaching on an individualized basis. The FSS Coordinator will also be able to provide information on and referrals to local services.

Escrow Accounts

Another incentive to families participating in the FSS Program is the ability to earn a tax-free escrow account, created in accordance with the requirements set forth in 24 CFR § 984.305. When participating families experience an increase in rent due to an increase in household earned income, an escrow credit is calculated using the HUD-52652 form. The escrow amount is credited in an account in accordance with HUD requirements. Generally, when a participant’s rent increases as a result of an increase in earned income, the difference (as compared to the original earned income amount in the CoP) is credited to the escrow account. Escrow credits are

calculated by the FSS Coordinator at every interim and annual examination for the family. Written notice of changes to monthly escrow credits are provided to the family and an annual statement of the account balance and interest earned is provided at the end of each fiscal year. In the event of a rounding issue between the HUD form-52652 and agency software, a manually completed HUD form-52652 will be used as the correct escrow amount for the family and documented in the file. FSS families who are not low-income (families whose adjusted annual income exceeds 80% of the area median income) are not entitled to any FSS credit.

Interim Disbursements

Lake MHA may allow for a portion of the escrow account funds to be disbursed to a family when it is determined by Lake MHA that the FSS family has fulfilled certain interim goals established in the CoP and the FSS family needs a portion of the FSS escrow account funds for purposes consistent with or in support of the CoP. The Head of the FSS family must make a request for an interim disbursement in writing. Interim disbursements may only be made during the contract period and for contract related expenses. The following requests may be considered contract related expenses:

1. Emergency car repair or purchase – when transportation is needed for employment or education. Generally, two estimates will be requested for vehicle repairs unless the car is immobile.
2. Costs associated with obtaining a valid driver's license.
3. Educational costs to improve employability.
4. Credit repair/paying old debt, excluding overdue rent and/or utilities, or regular monthly expenses.
5. Business start-up expenses.
6. Other circumstances that assist in ITSP goal actualization, as determined on a case-by-case basis and approved by the FSS Coordinator, HCV Program Supervisor, and Chief Executive Officer.

For interim disbursements, a maximum of 50% of the escrow account may be withdrawn at one time per the approval of the FSS Coordinator, HCV Program Supervisor, and the Chief Executive Officer. No more than three interim disbursements shall be permitted for any participant during their contract term. The escrow money shall be made payable to the agency providing the service and/or goods, and not the FSS participant, unless the agency is unwilling to accept

payment directly from Lake MHA. In those circumstances, at Lake MHA's discretion, the money may be paid to the participant. When an interim disbursement is paid directly to the participant, Lake MHA will request documentation and/or receipts that the money was used as approved. Interim disbursements will not be approved if the family is not current with rent payments. Additionally, unless the interim disbursement was made based on fraudulent information from the family, the family is not required to repay such interim disbursements, even if the family does not complete the CoP.

Final Disbursements

The escrow account will be paid out to the head of the FSS family when the following has occurred:

1. Graduation - The family has met all obligations under CoP, the contract is considered complete (whether at the expiration of the contract term or prior to expiration of the contract term), and the family is in compliance with the terms and conditions of the HCV Program regulations.
2. Termination with Escrow Disbursement - The CoP is terminated and one of the following HUD-established good cause circumstances exists:
 - a. Services that Lake MHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.
 - b. The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless Lake MHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
 - c. An FSS family in good standing¹ moves outside the jurisdiction of Lake MHA, in accordance with portability requirements, for good cause and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible. Good cause circumstances are subject to verification. "Good cause" in this circumstance will mean:
 - (i) Moving to a different jurisdiction for the purposes of employment, education/training, or housing circumstances out the family's control

¹ In accordance with 24 CFR § 984.103, an FSS family is considered to be in good standing when the family is in compliance with their FSS CoP, has satisfied or is current on any debts owed to Lake MHA, and is in compliance with the regulations of the HCV Program.

Should the FSS family owe money to Lake MHA, the family's escrow will be reduced by that amount before prorating the interest income earned and making the final disbursement. The escrow account will be paid out within 30 days after the effective date of graduation or termination of the CoP, unless there is an extenuating circumstance that requires additional evaluation to determine contract completion, including investigating allegations of HCV Program violations. Delays in disbursing /forfeiting escrow will be documented in the FSS family file. The interest for the escrow account will stop on the date the family graduated.

Escrow Forfeiture

A participating family will forfeit their escrow account funds when:

1. The CoP is terminated by mutual consent of the parties, failure of the FSS family to meet its obligations of the CoP without good cause, withdrawal from the program, or termination from the HCV Program.
2. The CoP is completed by the FSS family, but the family is receiving welfare assistance at the time the CoP term expires, including any approved extension.

Any forfeited escrow funds will be used for the benefit of FSS participants in good standing. Specifically, the funds will be used for the following eligible activities as determined by the FSS Coordinator, HCV Program Supervisor, and Chief Executive Officer, depending on the needs of the FSS participants and the amount of escrow available:

1. A class or training open to all FSS participants in good standing, coordinated by Lake MHA, and related to employment preparation and retention skills, financial management skills, or other subject relating to achieving obligations outlined in the CoP.
 - a. When it is determined that funds will be used for this purpose, a notice will be issued to all FSS participants in good standing explaining the availability of the class/training and how and by when a participant must respond to reserve a spot for the class.
2. For transportation, childcare, training, testing fees, employment preparation costs, or other costs relating to achieving obligations outlined in the CoP.
 - a. When it is determined that funds will be used for this purpose, a notice will be issued to all FSS heads of household in good standing explaining

the ability to request up to a particular amount of funds to pay for costs related to achieving obligations outlined in the CoP. Requests must include the purpose for which funds will be used and amount requested. Requests with complete information will be approved on a first come, first served basis until the forfeited escrow funds set for this purpose have been used or unclaimed. Lake MHA will request documentation and/or receipts that the money was used as approved.

3. Training for the FSS Coordinator.

Outreach Efforts

Outreach will be ongoing at each new admission voucher briefing, as well as with each annual income reexamination. FSS information will be posted on Lake MHA's website. Posters, flyers, and brochures will be made available in the Lake MHA waiting room and interviewer rooms. Brochures will be sent to service agencies in Lake County with periodic updates. Periodically, mass mailings and distribution of materials to all eligible participants may occur at the discretion of the Chief Executive Officer or designee. Articles regarding FSS may be included in Lake MHA newsletters.

By notifying every HCV family, Lake MHA seeks to make this opportunity available to all persons, in accordance with Lake MHA's equal opportunity policy.

FSS Family Selection Procedures

FSS clients will be selected from interested, active HCV participants, subject to the selection requirements set forth in 24 CFR § 984.203. It is the policy of Lake MHA 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, Lake MHA'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. Should Lake MHA be unable to accommodate a client's request due to undue financial or administrative burdens or the request results in a fundamental alteration of the program, the client will be referred to other agencies that may be able to better assist the client.

The FSS Program will provide all FSS applicants and participants information on fair housing issues. Fair Housing brochures are in the Lake MHA lobby and accessible to all participants of the FSS Program and future applicants. Information on fair housing issues is included in the intake materials provided to all applicants of the FSS Program. The FSS Coordinator will make referrals to fair housing agencies and other agencies that provide advocacy for individuals with disabilities, as needed. The FSS Coordinator will make any referrals needed to ensure that an FSS applicant or participant is able to file a complaint on fair housing issues.

At all times, Lake MHA will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

If an applicant is not selected for the FSS Program at any time, the applicant will be notified in writing of the reason they were not selected for participation. The notice will state that applicants have the opportunity to appeal the decision by making a request for an informal hearing within ten (10) business days of the date of the notice. All hearings shall be conducted in compliance with Lake MHA's Administrative Plan regarding informal hearings.

FSS Waiting List and Program Intake

Should it become necessary due to the volume of applicants and/or the current program size being filled, Lake MHA will maintain an FSS waiting list. Once an application for the FSS Program has been received, the following actions are taken:

1. The family's application will be date stamped when received by the Lake MHA office.
2. The application is entered into the FSS waiting list according to the date stamp and given a waiting list number.
3. The FSS Coordinator will ensure the family is a part of the HCV Program before entering them into the FSS waiting list.
 - a) If the family is not currently part of the HCV Program, the family will be sent a letter explaining they are not eligible for the program.
 - b) If the family is a pending New Admission to the HCV Program, the application will be placed on hold until such time that their unit is approved and they are leased up and receiving housing assistance.
 - c) Any person who previously participated in the FSS Program at Lake MHA, whether the participant graduated or exited without graduating, will not be eligible for future FSS participation and will have their application withdrawn by written notification.
 - d) An applicant with an outstanding debt owed to Lake MHA will be permitted to participate in the FSS Program, provided they are in full compliance with the terms of their repayment agreement.
4. Prior to scheduling the family for FSS intake appointments, the following actions are taken:
 - a) The Coordinator will check to ensure the family is still on the HCV Program.
 - b) The Coordinator will check to see if the family is under termination. If the family is under termination, the application will be placed on hold until the informal hearing results are known.
 - c) If the family is no longer participating in the HCV Program, the family will be sent a letter informing them they are not eligible and their name will be removed from the waiting list.

Selection Preference

Lake MHA will give a selection preference for up to ten percent of Lake MHA's FSS Program slots (five FSS slots) to any eligible participant who is porting into Lake MHA from another jurisdiction and is actively participating in the FSS program at the initial Housing Authority (has an active FSS CoP). Applicants within this preference will be selected based on the date and time of application to the FSS Program. The FSS Coordinator will contact the initial Housing Authority's FSS program coordinator to ensure that the client is actively participating in the program. A porting family with an active FSS CoP may fill the other FSS Program slots when selected from the waiting list based on the date and time of their application. If all FSS slots are full at the time an incoming portable family with an active FSS CoP expresses interest in utilizing the port option, the FSS Coordinator will contact the initial Housing Authority's FSS program coordinator and the porting family to discuss the benefits and disadvantages of porting and the options for placement on Lake MHA's waiting list, continuing in the initial Housing Authority's FSS program, or completing or terminating their CoP prior to porting to Lake MHA.

Any FSS applicants not selected via the selection preference for incoming portable families with an active FSS CoP will be selected for the FSS Program on a first come, first serve basis, based on the date and time of their application, as described above.

Screening for Motivation

The FSS enrollment process includes two intake appointments between the FSS Coordinator and the applicant. When intake appointments are scheduled, the following actions are taken:

1. The FSS Coordinator will send a letter scheduling the applicant for two intake appointments. A personal self-assessment form, verification information form, and FSS Program orientation materials will be sent with the appointment letter. It is requested that the applicant return the completed forms for review at the first intake appointment.
2. Should the applicant fail to attend a scheduled intake appointment without a prior request to reschedule, the FSS Coordinator will attempt to reschedule the missed appointment. Failure to attend the rescheduled appointment without prior notice will result in the FSS application being withdrawn.

3. The FSS Coordinator will conduct a Needs Assessment to identify the strengths and needs of the family, to determine the appropriateness of the program to the applicant, and to screen for motivation. The applicant will be given two pre-selection tasks to complete prior to the second intake appointment. All applicants are given the same motivational tasks – a) to complete a Personal Goal Setting Worksheet within 7 days of the first intake appointment and, (b) provide a resume at their second intake appointment. Lake MHA screens motivation by completion of these tasks by the assigned due date.
4. If the applicant has not completed the tasks due to extenuating circumstances, and has notified the FSS Coordinator, the FSS Coordinator may request the applicant to provide verification that pre-selection tasks were not completed due to personal or dependent medical situations, lack of available service necessary to complete tasks, or inability to complete tasks due to a disability. The FSS Coordinator may provide additional time for completion due to the extenuating circumstances, generally not to exceed an additional 7 days.
5. At the second meeting, if the applicant has successfully completed the pre-selection tasks, the CoP and ITSP are finalized and signed and the applicant signs an Agreement to Succeed. If the applicant does not wish to participate in the FSS Program or fails to complete tasks in accordance with the steps outlined above, then the applicant’s FSS file will be closed and the applicant notified in writing that their application has been withdrawn.

Case Management Activities and Supportive Services

Contract of Participation (CoP) and Individual Training and Services Plan (ITSP)

Each family participating in FSS must execute a CoP with Lake MHA. Only the head of the FSS family signs the CoP, but other family members may have Individual Training and Services Plans (ITSP) by mutual agreement of the participating family and the FSS Coordinator. The head of the FSS family can be any adult member of the household who is chosen by the family to act as the head of the FSS family. The head of the FSS family does not have to be the head of household for the HCV Program. The household will be required to sign a form designating which adult member of the household will act as the head of the FSS family. The household may agree to change the adult designated as the head of the FSS family during the term

of CoP by signing a new designation form, which will then be reflected in the CoP. In this circumstance, the CoP start and end dates and baseline will not change.

Similarly, if the head of the FSS family ceases to reside with other family members in the assisted unit, the remaining members of the FSS family, after consultation with Lake MHA, will have the right to designate another family member as head of the FSS family to receive the funds in accordance with the regulations by signing a new designation form. This change will need to be reflected in the CoP and the FSS Coordinator may reassess the family's needs.

The CoP describes the responsibilities for the participant family including mandatory goals, ITSPs, and the circumstances resulting in termination from the program. There are two mandatory goals that are part of the CoP. First, the head of the FSS family is required to seek and maintain suitable employment. Lake MHA generally defines "suitable employment" as full-time employment, employment averaging 30 hours per week, or part-time employment with part-time enrollment in a school/training program. Employment less than 30 hours a week may also be considered suitable. Ultimately, the determination of what constitutes "suitable employment" for each family member with a goal of seeking and maintaining it will be made by Lake MHA, with the agreement of the affected participant based on the participant's skills, education, job training, and receipt of other benefits, and the available job opportunities within the community.

Second, all family members must be free from cash welfare assistance at the time of graduation. Any other goals established will be established by mutual agreement of the FSS Coordinator and the participant in the participant's ITSP.

An ITSP for each participant, developed based on the Needs Assessment, Personal Self-Assessment, and Personal Goal Setting Worksheet, will be attached to the participant family's CoP. The goals established should be realistic and may vary greatly between individuals due to the differing needs of participants. Participants will be assessed on a case-by-case basis.

Modifications may be made to the ITSP as needs change and if goals are no longer appropriate or obtainable. Existing goals may be changed or removed and new goals may be added. There is no limit on the time or number of modifications that

can be made to an ITSP; however, modifications must be made in writing, by mutual agreement between the FSS Coordinator and the FSS participant.

The CoP goes into effect on the first day of the month following the execution of the CoP. Each FSS family is required to fulfill CoP obligations no later than five years after the first reexamination of income (interim or annual reexamination of income) after the execution date of the CoP. When an expiration date is added to the CoP both Lake MHA and the head of the FSS family must sign an amendment that states the new date.

The CoP may be extended for a period of up to two years for good cause. Families may request up to two one-year extensions. Requests for extensions must be made in writing by the head of the FSS family, prior to the CoP's expiration date and contain a description of the need for extension. "Good cause" may include:

1. Circumstances beyond the family's control such as death in the family, serious illness, or medical emergency;
2. Involuntary loss of employment including lay off, national or natural disasters, strikes, closing of business, or serious illness of a family member. Termination for nonperformance is not grounds for an extension.
3. The active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension, such as completion of a college degree during which the participant is unemployed or under-employed or credit repair toward being homeownership ready.
4. The FSS family will not be free from cash welfare at the end of the CoP term, but is likely to become free from cash welfare during the extension.

Case Management

The role of the FSS Coordinator includes advocating for the participant with service providers and being sensitive to the concerns and needs of low-income families. The FSS Coordinator uses a variety of means to maintain contact with FSS participants. That contact may include telephone calls, emails, letters, and face to face contact.

FSS participants are required to maintain contact with their FSS Coordinator. Repeated failure to respond to the FSS Coordinator will be grounds for termination from the FSS Program. All participants are requested to contact their FSS

Coordinator on a regular basis to provide updates on progress in completing goals and meeting needs. Participants who consistently fail to maintain contact shall be notified by mail of failure to do so and a request will be made for the participant to contact the FSS Coordinator immediately. Failure to respond to three contacts (of any combination of telephone calls and notices) may result in proposal for termination from the FSS Program.

The FSS Coordinator will meet at least annually with each participating family to review the ITSPs and goal progress, and make recommendations for modifications in the ITSPs or to service providers. Interim appointments will be set up to discuss emergent needs of participants as they occur. Clients will receive additional referrals to supportive services as needed.

The FSS Coordinator will track the progress of participants. Goal progress and completion will be documented and maintained in the FSS family's file. Acceptable documentation of goal progress and completion may include, but is not limited to, paystubs from an employer, a letter from an employer, a service provider, or a college, university, or training program documenting start and end date, enrollment, completion, etc. A self-certification may be used when third-party documentation is unavailable.

Participants of FSS will be referred to an array of supportive services, if desired and based on identified needs of the family. These needs will be identified through the completion of the Needs Assessment and through ongoing contact with the participating family.

Supportive Services: Community Resources and Partnerships

Lake MHA meets regularly with the Program Coordinating Committee (PCC) in an effort to secure resources for participating families. All FSS participants will be provided information listing local resources, including addresses and telephone numbers. Information regarding service providers will be made available to all participants at appointments, by telephone, e-mail, or other written request. Lake MHA maintains a partnership with many service providers who can provide a variety of supportive services. The supportive services and service providers an FSS participant may be referred to include the following:

Supportive Service Category	Specific Service	Source/Partner
<input checked="" type="checkbox"/> Assessment	<input checked="" type="checkbox"/> Vocational Assessment Educational <input checked="" type="checkbox"/> Disability Assessment <input checked="" type="checkbox"/> Other specialized assessments	Ohio Means Jobs, Crossroads Health, and Opportunities for Ohioans with Disabilities
<input checked="" type="checkbox"/> Child Care	<input checked="" type="checkbox"/> Financial assistance for child care <input checked="" type="checkbox"/> Child care search <input checked="" type="checkbox"/> Respite services	Lake County Department of Job and Family Services and Crossroads Health
<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Bus passes <input checked="" type="checkbox"/> Route education and planning <input checked="" type="checkbox"/> Assistance with car purchase <input checked="" type="checkbox"/> Assistance with car repair	Laketran and Lifeline
<input checked="" type="checkbox"/> Education	<input checked="" type="checkbox"/> High School Equivalency/GED <input checked="" type="checkbox"/> English as a Second Language <input checked="" type="checkbox"/> Post-secondary degrees and certificates	Auburn Career Center (ASPIRE) and Lakeland Community College
<input checked="" type="checkbox"/> Skills Training	<input checked="" type="checkbox"/> Training in Executive Function <input checked="" type="checkbox"/> Basic Skills Training <input checked="" type="checkbox"/> Emerging Technologies Training <input checked="" type="checkbox"/> Apprenticeships <input checked="" type="checkbox"/> Skilled Labor training	Ohio State University Extension Office, Auburn Career Center, and Ohio Means Jobs

<input checked="" type="checkbox"/> Job Search Assistance	<input checked="" type="checkbox"/> Resume Preparation <input checked="" type="checkbox"/> Interviewing Skills <input checked="" type="checkbox"/> Dress for Success <input checked="" type="checkbox"/> Workplace Skills <input checked="" type="checkbox"/> Job Development <input checked="" type="checkbox"/> Job Placement	Ohio Means Jobs, Goodwill, Salvation Army, Suit Yourself, Crossroads Health,
<input checked="" type="checkbox"/> Health/Mental Health Care	<input checked="" type="checkbox"/> Alcohol and Drug Abuse Prevention <input checked="" type="checkbox"/> Alcohol and Drug Abuse Treatment <input checked="" type="checkbox"/> Primary care <input checked="" type="checkbox"/> Dental services <input checked="" type="checkbox"/> Mental Health Services <input checked="" type="checkbox"/> Domestic violence assistance <input checked="" type="checkbox"/> Sexual and Reproductive Health Services	Crossroads Health, Signature Health, The Compass Line, Forbes House, and Extended Housing
<input checked="" type="checkbox"/> Crisis Services	<input checked="" type="checkbox"/> Crisis Assessment <input checked="" type="checkbox"/> Crisis Intervention <input checked="" type="checkbox"/> Crisis Management <input checked="" type="checkbox"/> Crisis Resolution	Crossroads Health and Beacon Health
<input checked="" type="checkbox"/> Child/Adult Protective Services	<input checked="" type="checkbox"/> Needs Assessment <input checked="" type="checkbox"/> Case Planning <input checked="" type="checkbox"/> Information Referral	Lake County Department of Job and Family Services
<input checked="" type="checkbox"/> Homeownership Preparation	<input checked="" type="checkbox"/> Homeownership Education <input checked="" type="checkbox"/> Housing Counseling	Fair Housing Resource Center
<input checked="" type="checkbox"/> Financial Empowerment	<input checked="" type="checkbox"/> Financial education <input checked="" type="checkbox"/> Financial coaching <input checked="" type="checkbox"/> Banking services <input checked="" type="checkbox"/> Training in money management	Goodwill, Salvation Army, Ohio State University Extension Office
<input checked="" type="checkbox"/> Individual Development Accounts	<input checked="" type="checkbox"/> Matched savings account upon completion of IDA program	Lifeline
<input checked="" type="checkbox"/> Legal Services	<input checked="" type="checkbox"/> Legal Services <input checked="" type="checkbox"/> Assistance negotiating the resolution of past-due debt	Legal Aid Society of Cleveland, Fair Housing Resource Center

FSS Coordinators shall, upon request, use available resources to procure any information regarding assistance that clients may need in order to complete FSS goals. FSS Coordinators will maintain effective relationships with representatives from the service providers listed above as well as any other agency or program which may provide assistance to clients in completing goals.

When available, FSS Coordinators may offer resources and services, including: (1) job search materials and notices; (2) resume development and evaluation; (3) credit report evaluation; (4) homeownership opportunities; and (5) financial literacy education information.

Active FSS participants who are transitioning into the Homeownership Program will receive a preference on the Homeownership wait list.

Method for Identification for Family Support Needs and Delivering Appropriate Support Services

Identifying Family Support Needs

Supportive services needs are identified by completion of the Needs Assessment with the FSS coordinator before completion of the initial Individual Training and Services Plan (ITSP), which occurs prior to signing the CoP. After enrollment in the FSS program, a Needs Assessment may also be used to modify the ITSP and supportive services, if requested by the family.

Delivering Appropriate Support Services

All families who participate in the FSS program will receive coaching services from the FSS Coordinator. The FSS Coordinator will help FSS families 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, break down the goals into achievable steps, identify family strengths and skills, understand the needs the family has for services and supports that may help the family make progress toward their goals, overcome obstacles, and access community services through appropriate referrals.

Transitional Supportive Services

After graduation and at the request of the former head of the FSS family, Lake MHA may provide the former FSS family appropriate coordination of FSS supportive services which are needed to become self-sufficient, so long as the family is still a participant in the HCV Program. Subject to limitations on staff capacity, Lake MHA 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.

Completion of the CoP

The CoP will be considered complete and the final escrow disbursed when the FSS family has fulfilled all their obligations under the CoP, on or before the expiration date of the contract (including extensions) and they are in compliance with their lease and family obligations under the HCV Program. This means the family has provided documentation that they have completed their ITSP goals satisfactorily and all family members are free from cash welfare assistance. Lake MHA will require third-party verification to document completion of ITSP goals. If third-party verification cannot be obtained, self-certification may be used as verification to document completion of ITSP goals.

Termination of the CoP

Involuntary Termination

Lake MHA may involuntarily terminate a family from the FSS Program under the following circumstances:

1. If the participant fails to meet their obligations under the CoP, the ITSP, and related documentation. Noncompliance includes:
 - a) Missing scheduled meetings, failure to return documentation, phone calls, and/or maintain contact after written notification of non-compliance;
 - b) Failure to work on activities and/or goals set forth in the ITSP, including employment activities;

- c) Failure to complete activities and/or goals within the specified time frames;
 - d) moving out of the jurisdiction without a determination that there is good cause to terminate the CoP with escrow disbursement; and/or
2. If the participant's housing assistance is terminated.

Participants who fail to meet their obligations under paragraph 1. above, as determined by an FSS coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned Lake MHA representative to review the situation. At this meeting, a review of the CoP, ITSP, and all related documentation will be conducted, and amendments will be made as necessary (within HUD guidelines) to allow for changes in circumstances. Failure to contact the FSS Coordinator to schedule this meeting within ten (10) business days of a written request by the FSS Coordinator to set up this a meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue(s), may lead to termination from the program. The FSS Coordinator will also attempt to contact the participant via phone, text, in person and/or email prior to the review meeting. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program.

If the initial meeting does not resolve the problem, or if the meeting is not requested by the family within the required period, notification of termination will be made to the family by letter stating:

1. The specific facts and reasons for termination;
2. A statement informing the family of their right to request an informal hearing and the date by which this request must be received;
3. A statement informing the family that termination from the FSS program for the reasons stated therein will not result in termination of the family's housing assistance.

All hearings will be conducted in compliance with Lake MHA's Administrative Plan regarding informal hearings. Failure to request a hearing in writing by the deadline will result in closure of the family's FSS file and all rights to a hearing will be waived. All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. Housing assistance will not be terminated based on non-compliance with the FSS program. The current amount of escrow in the family's escrow account will be included in the letter.

Voluntary Termination

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

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

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 may also be terminated with an escrow disbursement when Lake MHA has determined and documented that the circumstances described in the Final Disbursement section, above, exist.

Assurance of Non-Interference

Participation in the FSS Program is voluntary. A family's decision on whether to participate in FSS will have no bearing on Lake MHA's decision of whether to admit the family into the HCV Program. The family's housing assistance will not be terminated based on whether they decide to participate in FSS, their successful completion of the CoP, or on their failure to comply with FSS program requirements.

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

Timetable for Implementation

Lake MHA filled its mandatory slots and met all previous timetable deadlines and requirements for program implementation. Lake MHA will continue to administer a voluntary program per this FSS Action Plan. The FSS Coordinator will conduct outreach activities and work with community services providers and the PCC to ensure the minimum program size is met.

Coordination of Services

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.

Program Coordinating Committee

The principal vehicle for ensuring ongoing coordination of services is the PCC, which has been established in accordance with FSS regulations to assist in securing commitments of public and private resources for the operation of the FSS Program. Among other responsibilities, the PCC will help the FSS program to identify and build strong referral relationships with providers of supportive services that meet the needs of FSS participants. The PCC will also be consulted in developing program policies and procedures.

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

1. One or more FSS Program Coordinators;
2. One or more participants from each HUD rental assistance program served by the FSS program; and
3. Representatives from a variety of agencies and individuals, which include but are not limited to Job & Family Services, Lakeland Community College, Auburn Career Center, Crossroads, Salvation Army, Lifeline, Laketran, Project Hope, Forbes House, Sexual and Reproductive Health Services, Extended Housing, Goodwill Industries, OSU Extension Office

FSS Portability

Portability in the Initial 12 Months

FSS participants may not exercise portability within the initial 12 months after signing a CoP. Lake MHA will consider exceptions to this policy for purposes of reasonable accommodation or reasons related to domestic violence, dating violence, sexual assault, or stalking.

Moves into the PHA's Jurisdiction

If an FSS participant moves into Lake MHA's jurisdiction, they will be admitted in good standing into the Lake MHA's FSS program unless Lake MHA 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 Lake MHA is able to receive an incoming family from another jurisdiction into the FSS program, Lake MHA 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.

FSS Termination with Disbursement for Porting Families

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, Lake MHA 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 sections on Termination and Final Disbursement.

Where continued FSS participation is not possible, Lake MHA 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.

Reasonable Accommodations, Effective Communications and Limited English Proficiency Requirements

Requests for Reasonable Accommodations

A person with disabilities may request reasonable accommodations to facilitate participation in the FSS program. Requests will be considered on a case-by-case basis. Requests may be made and will be addressed in accordance with Lake MHA's Administrative Plan.

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. Requests will be addressed in accordance with Lake MHA's Administrative Plan.

Limited English Proficiency

Lake MHA will comply with HUD requirements to conduct oral and written communication related to the FSS Program in language that are understandable to people with Limited English Proficiency. For more information, see Lake MHA's Administrative Plan.