

BOULDER COUNTY HOUSING AUTHORITY

FAMILY SELF-SUFFICIENCY PROGRAM

ACTION PLAN

Revised January 2022

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1. Boulder County Housing Authority **Family Self-Sufficiency Program Overview**

The Boulder County Housing Authority (BCHA) Family Self-Sufficiency Program (FSS) is a 5-year academic, employment and savings incentive program designed to help low income families, who have rental assistance (Section 8 or Project Based Voucher), gain job training and education to improve their family's financial situation and move toward self-sufficiency.

BCHA's FSS program was created in 1984 as part of a federal HUD pilot program (Project Self-Sufficiency) that offered eligible low-income families the opportunity to receive a wide array of coordinated services designed to help them attain economic independence.

The BCHA FSS program is a joint program with Boulder Housing Partners (BHP) which runs a Moving To Work (MTW) program. At the beginning of January 2022, BCHA FSS program has 52 HCV and 46 PBV. The Joint BHP FSS program has 35 PBV.

The FSS program helps participants set job training and educational goals that will lead to better employment opportunities. According to DeVol (2006), "Poverty traps people in the tyranny of the moment, making it very difficult to attend to ...plans for the future-the very things needed to build adequate resources and financial assets." In order to provide participants with the support they need to improve financial burdens, FSS helps participants access: Childcare Assistance, Financial Aid, Transportation, First-time Home-buying, and Emergency Financial Help for rent, utilities, and childcare. FSS combines rental assistance and the coordination of services to help participating households achieve economic self-sufficiency.

The educational goals of FSS participants are set and attained through the combination of financial assistance, case management, referral and linkage to community agencies that help with Academic Advising, Career Counseling, and in some cases, internships. Once education has been attained, FSS support specialists facilitate job search and job preparedness, and refer to other agencies that assist in this process.

Participants receive personal support and tailored guidance through their work with the FSS support specialist. Support specialists assist in the creation of a holistic life plan that can lead participants to a more desirable lifestyle. Support specialists address family, health, personal, financial and educational challenges that are key areas to

troubleshoot while on the path to goal achievement. Support specialists refer participants to parenting/financial classes and professional counseling services that can aid them in their process toward attaining self-sufficiency. Participants are encouraged to attend a variety of life skills classes: Financial Workshops, such as, Budgeting on a Small Income or Thoughtful Money Management or parenting classes. FSS participants are encouraged to become involved with a variety of support networks and actively participate in community groups or in other activities in which they have an interest, such as, P.E.R.L. (People Engaged in Raising Leaders) training, Single-Parenting Support Groups or the Thrive Program.

As defined in the FSS Contract of Participation and for the purposes of the BCHA FSS program, “Self-Sufficiency” is defined as: maintaining suitable employment after the completion of a job training and/or academic program, being free of TANF for the last 12 months of FSS program enrollment, and moving toward the ultimate goal of being free of a housing subsidy.

By BCHA FSS program standards, the goal is that each BCHA FSS participant will make progress during their tenure with FSS. The FSS program uses the **Colorado Family Support Assessment – Version 2.0 (CFSA 2.0 attached)** to guide the FSS support specialists in providing effective Family Development Services through program implementation and evaluation support, including analysis of family support data which is tracked in a common data base system. The CFSA 2.0 is utilized to allow for more consistency between Boulder County programs that utilize this measurement tool. The purpose of the CFSA 2.0 is to obtain an objective assessment of family well-being in multiple areas. The FSS support specialists administer the tool using an interview format to identify family strengths and areas for growth and change. The CFSA 2.0 includes the following 3 sections:

Part A, the Domain Matrix, assesses family stability in 13 categories critical to family self-reliance (income, employment, housing, transportation, food security, child care, child education, adult education, cash savings, debt management, health coverage, physical health, and mental health). Each domain is rated on a scale of 1 to 5 using domain-specific indicators.

Part B, The Protective Factors Survey (PFS), assesses five factors that protect against child abuse and neglect (Family Functioning/Resiliency, Social Support, Concrete Support, Nurturing and Attachment, Knowledge of Parenting, and Child Development).

Part C, Family Readiness to Change, assesses areas in which families would like to change and how ready, on a scale of 1 to 10, they are to make a change in the identified areas. Specifically, families are asked to identify the areas in which they would most like to make a change (ideally no more than three or four) and then rate each selected area on a scale of 1 to 10, with 1 indicating 'not at all ready' and 10 indicating 'extremely ready'.

The CFSA 2.0 is typically administered within the first two weeks of working with a family (baseline assessment) and at three- to six-month intervals thereafter (follow-up assessments).

2. Family Demographics

In January 2022, the Family Self-Sufficiency program actively managed 127 households. The FSS families that participate in the BCHA/BHP program are primarily Caucasian, non-Hispanic, female-headed households. Many participants are employed (74%) or in school (32%). 87% of households in the program are single parent households.

The caseload demographics as of January 2021 are:

Race	Ethnicity	Gender
Caucasian: 75%	Hispanic: 34%	Male: 6%
African American: 4%	Non-Hispanic: 55%	Female: 94%
Hawaiian/Pacific Islander: 4%	Not Reported:9%	
Asian: 4%		
Native American: 3%		
Other: 6%		
Unreported: 9%		

Families enrolled in the FSS program typically identify the following supportive service needs in order to work towards and achieve financial self-sufficiency:

- Access to Academic Programs (GED and Community College)
- Access to Vocational Training
- Access to Career Counseling and Skills Analysis / Assessment
- Access to Child Care and/or Child Care payment assistance
- Access to Family/Individual Counseling
- Access to Parenting Classes
- Access to Budget Assessment and Money Management Education
- Access to Job Placement Programming

- Access to Transportation and Transportation Assistance

3. Estimated Number of Participating Families

The BCHA's FSS program is a voluntary program and as of January 2022, FSS has 46 slots allocated for BCHA Project-Based Voucher units, 52 BCHA Housing Choice Vouchers and 35 slots allocated for BHP Project-Based Voucher units. The standard caseload size varies from 44 participants per Full-Time Support Specialist.

4. Eligible Families from Other Self-Sufficiency Programs

Preference is given to households porting to, or being absorbed by, BCHA's FSS program. These households must be actively involved, and in good standing with the originating Housing Authority's FSS program.

5. FSS Family-Selection Procedures

It is the policy of the Boulder County Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws; the Americans with Disabilities Act; and the U. S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. BCHA will ensure that it follows these Regulations and Laws to affirmatively further fair housing for all the Section 8 Programs including the Section 8 Housing Choice Voucher, the Section 8 Project-Based Voucher and the Family Unification Program.

- No person shall, on the ground of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Boulder County Housing Authority housing programs.

To further its commitment to full compliance with applicable Civil Rights laws, BCHA will provide Federal/State/local information to applicants for and participants in the Section 8 Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the Boulder County Housing Authority office. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

BCHA will assist any family that believes they have suffered illegal discrimination by providing them with copies of the housing discrimination form. BCHA will also assist them in completing the form, if requested, and will provide them with the address of the nearest HUD Office of Fair Housing and Equal Opportunity.

Eligibility

To be eligible to apply for the FSS Program, applicants may be current BCHA or BHP Section 8 Housing Choice Voucher family or families that are eligible for a Project Based Housing Voucher, and have motivation to pursue educational and employment goals and qualify for housing.

- Individuals who were enrolled in an FSS program in the past and graduated successfully with an escrow account, are not eligible to reapply to the program.
- Individuals who were enrolled in an FSS program in the past, but did not graduate successfully, or left the FSS program before the 5-year period was complete, may be eligible to reapply for the FSS program a second time. Depending upon individual circumstance, former participants may be eligible to reapply after 3 years from their previous exit from the program. The 3 years is in alignment with the BCHA Section 8 Administrative Plan.
 - These former participants would be required to reapply to the FSS program by completing an FSS Application and doing an informal interview with two FSS support specialists to discuss the circumstances surrounding their past FSS participation and to review their future goals. The FSS supportive specialists would assess for motivation for their name to be put on the FSS waitlist.

Application, Waitlist, and Program Acceptance Process

A tenant with a BCHA or BHP Section 8 Housing Choice Voucher may apply for the FSS program by completing and submitting a written **FSS Application** (attached) to the FSS Program. Applicants who do not currently have housing assistance may apply as well.

Once the FSS support specialist reviews the FSS applicant's submission, the FSS applicant will be contacted for the scheduling of an FSS Interview.

The FSS Interview is conducted by two (2) FSS support specialists and is designed to 1) determine applicant's motivation and readiness for the FSS program; 2) explain what goals are needed to be accomplished in order to graduate successfully (Be TANF free for 12 months and have employment); and 3) inform the applicant of the expectations around the program (participation, monthly meetings, etc.).

Applicants will be screened on their motivation to become self-sufficient. The FSS support specialists consider willingness to work with a support specialist, motivation to

complete their goals and desire to access supportive services offered through the FSS program; however, motivation to become self-sufficient overrides all the above factors.

Following the FSS Interview, FSS staff will send an FSS Decision Letter to the applicant stating whether the applicant was provisionally approved for FSS.

Following the FSS Interview, the Decision Letter will invite the applicant to complete specific tasks/goals in order to further assess motivation to participate in FSS, and to contact FSS staff with documentation of task completion. Supportive service resources are also included in the FSS Decision Letter. Once the tasks are completed and documentation submitted to FSS staff, the applicant is placed on the FSS Waitlist.

- If an applicant does not subsequently follow through on the specific tasks/goals detailed in the FSS Decision Letter, the applicant will be invited to reapply to FSS six (6) months after the FSS Interview date.

If an applicant misses the first FSS Interview, a second interview will be scheduled. If an applicant misses two interviews, that applicant will be asked to reapply to FSS in six (6) months.

The FSS Staff will remain engaged with the applicants on the FSS Waitlist by doing monthly “check in’s” to ensure they are completing their personalized short-term tasks/goals, are maintaining contact with FSS, and are continuing to express interest in FSS participation.

Waitlist Process

For those applicants who do not yet have a Section 8 Housing Choice Voucher or a Project Based Voucher, the following will apply:

- Once an applicant on the FSS Waitlist moves into a BCHA or BHP designated FSS PBV housing unit, that applicant will be assigned a FSS Support Specialist and begin FSS participation.
- After three (3), six (6) or nine (9) months from the interview date, if an applicant on the FSS Waitlist is still waiting for a PBV housing unit, FSS Staff may ask for a copy of a paycheck stub, school schedule or documentation from any other activity the applicant may be doing. This request will serve as a check-in on motivation and to assess ongoing interest level in FSS.

- If the applicant has had difficulty in meeting the FSS Waitlist activities, the FSS support specialists will work with the applicant to provide resources and to assist with problem-solving and continued progress.
- If an applicant is not showing motivation around the tasks requested by FSS, that applicant may be removed from the FSS Waitlist. The applicant will be notified of why they are being removed from the FSS Waitlist with the opportunity to reapply in six (6) months.
- If the applicant no longer wants to be on the FSS Waitlist, their name will be removed with the opportunity to reapply in six (6) months.
- Applicants who request their name be removed or may have their name removed due to lack of motivation for the FSS Program will be 1) informed of the reasons for not being selected; 2) offered suggestions for future program readiness; 3) provided with appropriate referrals to community resources; and 4) offered an invitation to reapply to the program at a later date.

6. Program Enrollment

Applicants who have a BCHA or BHP Section 8 Housing Choice Voucher at the time of acceptance into the FSS program are mailed an Acceptance Letter assigning a support specialist and instructing the applicant to arrange an Initial Enrollment Meeting.

Applicants who have been approved for the FSS program who do not have a Section 8 Housing Choice Voucher but are eligible for a Project Based Voucher, and have been placed on the FSS Waitlist, are placed directly on the Boulder Housing Partners (BHP) Waitlist for a Project-Based Unit at the BHP Woodlands Residential Community which has 35 units.

The applicants on the BCHA PBV waiting list that are interested in and have been deemed eligible for the FSS Program will receive a preference ranking of twelve (12) points for the FSS/PBV specific lists, this preference does not apply to applicants applying to the HCV lottery. FSS staff will assess the prospective applicant based on its Procedures Manual and Federal Regulation 24 CFR 984. This preference is limited to no more than 104 families at any one time for the BCHA PBV Program.

When BCHA opens its waitlist for Project-Based units, an FSS support specialist will contact the applicant with information on waitlist assignment. Once on the BCHA PBV waitlist, applicants are ranked in the order in which they were approved, according to the date of their interview. When a housing unit becomes available, the applicant is contacted by BHP or BCHA. The participant's new housing is established, and leasing contracts are signed with BHP or BCHA. Once the participant has moved into the unit, FSS is notified, and the participant is mailed an Acceptance Letter (mentioned above) assigning an FSS support specialist and instructing the applicant to contact the FSS support specialist to arrange an Initial Enrollment Meeting.

During the Initial Enrollment Meeting, the FSS Support Specialist 1) explains the FSS Contract of Participation, Disclosure Statements, Individual Training and Services Plan; 2) reviews FSS program expectations, Successful Tenancy documents; and 3) obtains the necessary signatures from the participant to begin enrollment proceedings.

The FSS Contract of Participation is designed to clarify participant expectations and program offerings. The Disclosure Statement provides information on participant rights related to confidentiality. The Individual Training and Services Plan (ITSP) is created to identify participant goals and assess the participant's current employment/ financial / academic standing. The ITSP needs assessment identifies the most pressing issues impacting the participant's life situation: education, health, finances, and family. Participants prioritize the importance of each goal. The ITSP provides the participant and support specialist a baseline plan for holistic development that will lend itself towards employment/educational growth and financial independence allowing them to reach their goals to graduate successfully from the FSS Program.

Referral Sources

Referrals to the FSS program originate from a variety of local community agencies that serve low-income families. The FSS program staff network with personnel from governmental and non-profit organizations which manage transitional housing, basic needs, TANF eligibility, childcare, vocational rehabilitation, academic institutions, and counseling agencies. Past and present participants also refer potential families to FSS.

7. Incentives to Encourage Participation

FSS Escrow Account – BCHA Escrow Account and BHP Moving To Work (MTW) Escrow Accounts.

BCHA Escrow Account

BCHA will establish an FSS escrow account for the participant family. When the

participant family obtains an increase in earned income, rent payment is due to increase. A portion of that rent increase will be credited to the participant family's FSS escrow account in accordance with HUD requirements.

- Interim Withdrawals from an escrow account must be tied to the participants goals, such as, helping to pay for their education or down payment on a home. The FSS participant will submit a written request to the FSS support specialist for how the interim withdrawal will help them meet their goal. The amount of the interim withdrawal will depend on the request, what they are using the funds for and will be reviewed on a case to case bases.
- There can only be one Interim Withdrawal requested and approved during the participants time in the program.
- The FSS participant may submit a written request to extend their time in the FSS program to become welfare free; however, this request can only be made one time while the participant is in the program. If the participant goes back on welfare during the time frame they requested, in order to be welfare free, they will not successfully graduate from the FSS program and will lose their escrow funds.
- Once the participant family's Head-of-Household has successfully fulfilled the FSS Contract of Participation, the escrow funds will be disbursed to the family.
- The family may use the final disbursement of escrow account funds without restriction.
- A letter will be sent out annually to participants with their escrow amount.

Boulder Housing Partners Moving To Work Escrow Account

The BHP FSS MTW program has several ways in which FSS participants can earn escrow. BHP FSS MTW program started in January of 2020 and new FSS participants are diverted directly into the MTW program for earning escrow. BHP participants in the program before 2020 have the option to continue to earn escrow based on when the participant's family obtains an increase in earned income, and a portion of the rent increase will be credited to the participant family's FSS escrow account in accordance with HUD requirements. (Note above like the BCHA escrow account.) BHP participants in the program before 2020 also have the option to move to the MTW model of earning escrow which can be earned in two ways: earned income included in the rent calculation and goals achieved.

- Earned Income: Households will be recertified at the beginning of years 3 and 5. At that time, the household will be eligible to earn a monthly escrow deposit based on the amount of earned income that is included in the rent calculation. The monthly

amount is determined according to the BHP FSS Contract Addendum regarding Escrow Calculations (attached).

- Goals Achieved: As FSS participant families achieve certain goals, a corresponding deposit will be made to their escrow account. These goals are outlined in the chart attached (BHP FSS Contract Addendum regarding FSS Escrow Account).
- Once the participant family's Head-of-Household has successfully fulfilled the FSS Contract of Participation, the escrow funds will be disbursed to the family.
- The family may use the final disbursement of escrow account funds without restriction.
- A letter will be sent out annually to the participants with their escrow amount.

In 2021, 22 of the 23 FSS participants who graduated were able to increase their earned income and put money into their escrow accounts. The total dollar value of escrow accounts disbursed to these participants was \$214,855.58 and 3 participants were able to purchase homes.

Personal Investment Enterprise (Individual Development Accounts) – FSS participant families are eligible for Individual Development Accounts (IDA's): matched savings accounts. Participant families who are interested in benefiting from this incentive are required to contribute least \$25.00 per month to their account. IDA savings are matched by public and private sources. IDA funds are specifically designated for high-return investments, such as: 1) first-time homeownership; 2) post-high school education; and 3) business capitalization.

Scholarships – FSS participants are eligible to apply for financial scholarships, which are offered periodically during the calendar year. FSS participants apply for the Scholarships by completing the **FSS Scholarship Application**.

The BCHA FSS Scholarships are awarded to up to six (6) eligible FSS Participants once per year. FSS scholarship funds can be used for **living expenses** while an FSS participant is attending school. Since tuition expenses are frequently covered by Pell Grants, applicants use funds for other basic needs and daily living expenses.

- 1) Eligible Scholarship applicants must be enrolled in the FSS program for a least 1-year;

- 2) Applications must be fully completed and received by the stated submission deadline;
- 3) If an applicant applied in the past but was denied scholarship award, this applicant would receive priority consideration;
- 4) If an applicant received a scholarship in the past, they are ineligible;
- 5) Applicant's personal statement must stand out against other applicants in areas of personal growth, educational and/or family goals.

Scholarship Applications are reviewed by the **Scholarship Review Committee**, which consists of Boulder Community Housing Corporation Board Members and Housing and Human Services staff members.

The Scholarship Review Committee determines the scholarship award based on the Scholarship Review Criteria above.

Individual Scholarships are awarded up to \$1,000 each, depending upon funding.

In addition, Individual Financial Scholarships are offered in smaller amounts throughout the calendar year to assist FSS participants in academic supplies, books and basic needs. These smaller scholarships range from \$100-\$300 and are based on client needs, positive standing in school, and positive standing in the FSS program.

Home Ownership Counseling – BCHA offers home ownership assistance/counseling for FSS participants who are interested in purchasing their own home.

Financial Assistance – FSS support specialists help participants with financial assistance for emergencies. Participants also work with local Family Resource Centers the Emergency Family Assistance Association (EFAA), Sister Carmen Community Center or the OUR Center, to communicate their needs.

8. Outreach Efforts

FSS outreach materials are distributed to the two (2) Housing Authorities within Boulder County (Boulder County Housing Authority and Boulder Housing Partners).

FSS Program brochures may be posted in a public area at the housing authorities to provide accessibility to the materials.

FSS support specialists may conduct outreach by networking at community meetings, attending local events held by referral agencies and by conducting in-service trainings with partner agencies. FSS support specialist work with BCHA Occupancy Specialists by attending HCV orientations to market the FSS program to new HCV holders along with doing outreach to individuals that already have a HCV.

BCHA assures that both minority and non-minority families are informed about the FSS program. BCHA has bilingual (English – Spanish) employees on staff to ensure that we are meeting the language needs of the Boulder County community.

9. BCHA and BHP FSS Program Expectations

Successful graduation from the BCHA/BHP FSS program means that program participants must have met the criteria below:

- Have been off TANF funds for 12 months;
- Have secured and maintained suitable employment for 6 consecutive months (15-32 hours per week) in the FSS program due to uncertainty around the pandemic and working conditions. If Disabled or an Older Adult (62 years and above) they need to secure and maintain suitable employment for 5-10 hours per week for 3 consecutive months.

Other goals that participants have noted on their ITSP will be looked at but not a factor of successful graduation from the FSS program. These may include:

- Increased earned income resulting in contributions to escrow;
- Increased TTP;
- Cleaned up and improved credit score
- Locate safe and stable childcare
- Obtained Mental Health and Substance Abuse counseling
- Remained in compliance with lease agreement and Successful Tenancy;
- Remained in compliance with housing assistance requirements and rules;
- Successfully completed BCHA - FSS 5-Year Program Expectations.

Exceptions to these rules can be made temporarily by the FSS team, most specifically for those participants who have:

- Severe medical, physical/mental health related issues;
- Extenuating family circumstances; or
- Are in the process of completing a higher educational program (Bachelor's or Master's degree), which will lead to suitable employment and increased pay; however, they must have some form of employment to graduate successfully from FSS.

Reasonable Accommodation Paperwork:

The FSS program will offer participants who are struggling to meet employment/education goals on their ITSP with the opportunity to fill out a Reasonable Accommodation (RA) form that will go to the BCHA Reasonable Accommodation Committee. The RA is offered when FSS participant or a family member are struggling with a long term medical, physical/mental health related issue. The FSS program is 5 years and during that time life events can occur that may prevent the participant from being able to work or attend school. The RA supports the participant in taking the time needed to focus on themselves so that they can heal and then refocus on their FSS goals.

BCHA and BHP FSS participants, who reside in a PBV during their tenure in FSS, will be eligible for an HCV upon graduation. If HCV's are not available at the time of graduation, the participant is able to reside in their PBV unit until a voucher becomes available.

10. BCHA FSS Supportive Service Offerings

Case Management – The BCHA FSS standard caseload size is 44 participants per Full Time Support Specialist. Participants meet with their FSS support specialist on a monthly basis to establish what progress has been made toward their ITSP. New goals are created for the following month, which will bring the participant closer to the life that they desire educationally, financially and emotionally. These goals are recorded for the participants to use as a reference tool, and as a tracking tool for Support Specialists. Participants are offered access to a variety of resources in the community according to the needs that Support Specialists recognize at each of the meetings, and the direct requests of the participants.

Newsletter – FSS participant families receive a quarterly newsletter. The newsletter disseminates information on upcoming community activities and events, as well as helpful information, such as: location of flu shots, access to free school supplies, free workshops, health insurance options for children, and summer and after-school activities.

Holiday Adopt – A – Family Programs – FSS participant families are eligible to be sponsored or “adopted” by a donor family for the winter holidays.

Housing Stabilization Program and Emergency Financial Assistance – FSS participant families may be eligible for Housing Stabilization Program Funds and Emergency Financial Assistance for emergency situations. BCHA FSS can help with rent, utilities, childcare and other necessary expenses.

Services offered through agency partners:

- Career counseling, resume writing, job search assistance with Boulder County Workforce and the YWCA;
- Academic advising and financial aid assistance with Front Range Community College and the Educational Opportunity Center;
- Community Food Share;
- Boulder County’s Community Action Program administers PIE/IDA program;
- Rental, utility assistance & emergency food assistance with OUR Center, Sister Carmen and EFAA;
- Boulder County Housing Authority’s Personal Finance Program offers the Financial education workshops and homeownership workshops;
- Personal enhancement, enrichment and advancement through THRIVE;
- Childcare support through the Colorado Childcare Assistance Program.

11. Method for Identification of Family Support Needs

FSS Support Specialists meet monthly with FSS participants to assess family needs, growth steps, acquired and desired skills, and appropriate linkages to supportive service resources. FSS Support Specialists work in concert with the FSS participant family to identify realistic and attainable goals relating to education, career, job skills and personal enhancement. The Individual Training and Services Plan (ITSP) serves as a guide to assess and maintain participant progress and drives supportive service delivery. FSS Support Specialists maintain awareness of the community’s economic capital to better assist families in identifying resources.

12. Policy for Supportive Plans, Terms and Conditions, Probation and Exit/Appeal Process

BCHA will make every effort to enable a family to remain in FSS and will approve reasonable revisions to the ITSP to accommodate changing circumstances.

Participants in the BCHA FSS Program may be exited from the program through graduation, voluntary withdrawal, and program exit due to non-compliance with ITSP and/or not meeting with FSS Support Specialists to change/update ITSP.

Supportive Plans, Terms and Conditions, Probation and Exits

If the participant is not meeting the goals of their ITSP, the participant may be placed on a Supportive Plan. The intent of the supportive plan is to help the participant get reconnected with his/her goals and to address if any changes need to be made to the ITSP. The supportive plan can be in place for a three (3) month period or longer depending on how the participant is doing meeting his/her goals. When participants have a Reasonable Accommodation, they will have a Supportive Plan that is aligned with the timeline of the Reasonable Accommodation. If a participant continues to not meet their ITSP goals they may be placed on Terms and Conditions for a time frame that can range from (3) three to (9) months. If the participant doesn't follow through on meeting ITSP goals and the Terms and Conditions, they may be placed a Probationary Period for a length of time to help them get back in compliance with the FSS Program. The Terms and Conditions and the Probationary Period are opportunities to move toward meeting goals. If the participant fails to make a good faith effort to comply with the terms of the COP and the ITSP during the Probationary Period, FSS program services may be withheld or the participant may be exited from the program. It is the intent of the FSS program to only have participants offered one (1) Probationary Period during their tenure with the FSS program but this may vary depending on the circumstances of each FSS participant. For any FSS participant that is in a Project Based Housing unit being exited from the FSS program means that the participant can continue to reside in their BCHA/BHP unit and their rental subsidy will continue to be paid for by BCHA/BHP. For FSS participants with a Housing Choice Voucher, termination from the FSS program will not affect their housing status and they will continue to have their rental subsidy paid for by BCHA. BCHA or BHP may at any time terminate program assistance for a participant, because of any action or inaction by the household as cited in the BCHA Section 8 Administrative Plan.

Appeal Process

The Appeal Process for the FSS Program follows the **BCHA Section 8 Administrative Plan: Informal Review for Applicants and Informal Hearings for Participants process.**

If an applicant is denied acceptance into FSS, or if a participant is exited from FSS based on his or her failure to meet the FSS Contract of Participation and additional obligations, he or she can submit an Appeal, in writing, within 10 days of the denial or

exit notification to the HHS Director of Case Management and Community Outreach Division (CMCO). Individuals who appeal will have the opportunity for an Informal Hearing to consider whether the BCHA decisions relating to the individual circumstances of a participant family are in accordance with the law, HUD regulations, and Boulder County Housing Authority policies and FSS contractual agreements.

BCHA will schedule an informal hearing within 10-business days or within a reasonable time of receipt of the written appeal. The hearing will be conducted by a hearing officer, any person or persons designated by the Boulder County Housing Authority, other than a person who made or approved the decision under review or a subordinate of this person. The hearing officer must issue a written decision within 10 calendar days from the date of the hearing, stating briefly the reasons for the decision. Factual determinations relating to the individual circumstances of the family shall be based on a preponderance of the evidence presented at the hearing.

The Boulder County Housing Authority will investigate and respond to complaints by participant families, owners, and the general public. The Boulder County Housing Authority may require that complaints be put in writing. Anonymous complaints are investigated whenever possible.

13. Assurance of Non-interference with Rights of Non-participating Families

The BCHA FSS program assures that a family's election to not participate in the FSS program will not affect the family's admission to the Section 8 program or the family's right to occupancy in accordance with its lease.

14. Timetable for Implementation

The BCHA FSS Program accepts applications and new participants in order to fulfill BCHA program size requirements. BCHA reserves the right to close the FSS Waitlist when the FSS Caseload is at maximum (46 cases per full-time Support Specialist) and when the FSS Waitlist is longer than twelve (12) months.

15. Certification of Coordination

FSS coordinates services and case management plans with other self-sufficiency related programs. The FSS program works closely with Work Force Boulder County (WFBC) in order to avoid duplication of services. WFBC offers services around training, employment workshops, and life skills classes. Other agencies that the FSS Program coordinates with are as follows:

- Head Start
- A Precious Child

- TANF
- Front Range Community College
- Safe Shelter of St. Vrain Valley/Safehouse Progressive Alliance for Non-Violence
- Boulder County Mental Health
- The OUR Center
- A Woman's Work
- Boulder County Department of Housing and Human Services
- Emergency Family Assistance Association
- Sister Carmen Community Center
- Community Food Share

16. PCC Committee

FSS has a Program Coordinating Committee (PCC) that is a community collaborative of local public and private, nonprofit/for-profit, academic, public safety, human service organizations and community members. PCC works collaboratively to create the best possible impact on the lives of all Boulder County residents with a focus on FSS participants. PCC is committed to improving the quality of life for community members through partnerships, mentoring and building support networks. The PCC services in a general advisory role to the planning and implementation of the Boulder County Housing Authority's FSS program by:

*Identifying and providing linkages to community resources that will promote self-sufficiency for families;

*Assessing and addressing system barriers that may interfere with the goal of self-sufficiency and assist with the improvement of community wide service delivery.