

BOULDER COUNTY HOUSING AUTHORITY

FAMILY SELF-SUFFICIENCY PROGRAM

ACTION PLAN

Revised July 2022

Table of Contents

| | |
|--|-----------|
| 1. <u>Family Self-Sufficiency Program Overview</u> | <u>3</u> |
| 2. <u>Family Demographics</u> | <u>5</u> |
| 3. <u>Estimated Number of Participating Families</u> | <u>5</u> |
| 4. <u>Eligible Families from Other Self-Sufficiency Programs</u> | <u>6</u> |
| 5. <u>FSS Family Selection Procedures</u> | <u>7</u> |
| 6. <u>Incentives to Encourage Participation</u> | <u>11</u> |
| 7. <u>Outreach Efforts</u> | <u>14</u> |
| 8. <u>Supportive Services Offerings</u> | <u>14</u> |
| 9. <u>Method for Identification of Family Support Needs</u> | <u>15</u> |
| 10. <u>Program Termination; Withholding of Services; Grievance Procedures</u> | <u>16</u> |
| 11. <u>Assurance of Non-interference with Rights of Non-participating Families</u> | <u>18</u> |
| 12. <u>Timetable for Implementation</u> | <u>18</u> |
| 13. <u>Certification of Coordination</u> | <u>18</u> |
| 14. <u>Program Coordinating Committee</u> | <u>19</u> |
| 15. <u>Other Required Policies</u> | <u>19</u> |

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 (Housing Choice Voucher 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 July 2022, the BCHA FSS program has 58 HCV and 41 PBV. The Joint BHP FSS program has 35 PBV.

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 July 2022, the Family Self-Sufficiency program actively managed 128 households. The FSS families that participate in the BCHA/BHP FSS program are primarily Caucasian, non-Hispanic, female-headed households. Many participants are employed (71%) and/or in school (32%). 86% of households in the program are single parent households.

The caseload demographics as of July 2022 are:

| Race | Ethnicity | Gender |
|-------------------------------|-------------------|---------------|
| Caucasian: 69% | Hispanic: 33% | Male: 6% |
| African American: 3% | Non-Hispanic: 57% | Female: 94% |
| Hawaiian/Pacific Islander: 2% | Not Reported: 9% | |
| Asian: 2% | | |
| Native American: 3% | | |
| Other: 10% | | |
| Unreported: 13% | | |

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

If a HCV family elects to exercise portability of their housing voucher, the FSS program will attempt to accommodate participation in the FSS program. FSS Portability requires that there be only one escrow account and one Contract of Participation. The Action Plan of the housing authority that holds the current Contract of Participation will guide the family's participation in the FSS program.

Port-Ins to BCHA or BHP from another housing authority:

- Current FSS participants who exercise their right to portability into BCHA or BHP's jurisdiction will be given preference for the BCHA/BHP FSS program. If the participant enrolls in the BCHA/BHP FSS program, a new Contract of Participation will be executed for the term of the remaining contract. The new contract start date will be the first day of the month after the new contract is signed. The end date of the contract and the baseline figures from the initial contract will remain the same.

Port-Out to a receiving housing authority with a FSS Program:

- If the receiving housing authority accepts the participant into their FSS program and fully absorbs the resident into their housing authority, the FSS team will transfer the FSS Contract of Participation, ITSP, and escrow balance to the receiving housing authority.
- Where continued FSS participation in the receiving PHA's FSS program is not possible, the initial PHA must clearly discuss the options that may be available to the family. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

Port-Out to a receiving housing authority without a FSS program:

- If the receiving PHA does not administer an FSS program and the Receiving Housing Authority is absorbing the voucher, the FSS family may not continue participation in the FSS program.
- The PHA will, as stated above, clearly discuss the options that may be available to the family where continued FSS participation is not possible. Depending on the family's contract specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to

enroll the family in its FSS program, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or termination of the FSS contract and forfeiture of escrow.

5. FSS Family-Selection Procedures

It is the policy of the **Boulder County Housing Authority and the FSS program** 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/FSS 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/FSS 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/FSS will assist any family that believes they have suffered illegal discrimination by providing them with copies of the housing discrimination form. BCHA/FSS 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 support specialists would assess for motivation for their name to be put on the FSS waitlist.

Application, Waitlist, and Program Acceptance Process

Application process: A tenant with a BCHA or BHP Section 8 Housing Choice Voucher or Project Based Voucher and applicants who do not currently have housing assistance may apply for the FSS program by completing and submitting a written **FSS Application** (attached) to the FSS Program. Applications are provided to anyone interested in the FSS Program.

Once an interested party submits their completed application to the FSS program, an FSS support specialist reviews the applicant's submission and the FSS applicant will be contacted for the scheduling of an FSS Interview. Applicants are scheduled for interviews within one week after they have turned in a completed application.

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 need to be accomplished in order to graduate successfully; and 3) inform the applicant of the expectations of the program (participation, meetings, employment, etc.).

Selection process: FSS staff conduct an informal interview to assess the FSS applicant's motivation to participate in the FSS program. Following the interview, FSS applicants may be assigned certain tasks which indicate the family's willingness to undertake the obligations which may be imposed by the FSS contract of participation. However, any tasks assigned shall be those which may be readily accomplishable by the family, based on the family members' educational level, and disabilities, if any. The FSS program will

make sure reasonable accommodations are made for individuals with mobility, manual, sensory, speech impairments, mental or developmental disabilities.

Following the task completion, if an applicant is a current HCV or PBV participant, they will immediately begin the FSS program.

Following task completion, if an applicant is NOT a current HCV or PBV participant, then they will be placed on the FSS waitlist in order of task completion date.

- If an applicant does not subsequently complete the specific tasks/goals assigned following the interview, the applicant will be invited to reapply to FSS six (6) months after the FSS Interview date.

The FSS Staff will remain engaged with applicants on the FSS Waitlist by doing monthly phone “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 Housing Choice Voucher or a Project Based Voucher, the following will apply (see “Program Enrollment” for those individuals with a BCHA or BHP HCV or PBV):

- 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.
- If the applicant is in need of services or resources while on the FSS waitlist, 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.

Program Enrollment: Applicants who have a BCHA or BHP Housing Choice Voucher or Project Based 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 HCV or PBV 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.

6. 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-by-case basis.
- There can only be one Interim Withdrawal requested and approved during the participants time in the program.
- Once the participant family's Head of FSS family has successfully fulfilled the FSS Contract of Participation, the escrow funds will be disbursed to the Head of FSS 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.

If the FSS contract of participation is terminated, the balance of the participant's FSS escrow account will be forfeited. In accordance with HUD guidelines, an exception to this rule applies when:

- Services that the PHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable
- The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the PHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family

- An FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements) for good cause and continuation of the CoP after the move or completion of the CoP prior to the move is not possible

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.

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 standout 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.

7. 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 also has a website accessible to the public with program information.

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 specialists work with BCHA and BHP Occupancy Specialists by attending HCV orientations to market the FSS program to new HCV holders. FSS staff will send a blast email to all current HCV and PBV participants in BCHA and BHP at least every 6 months to promote the FSS program and invite interested parties to apply.

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.

8. 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

interim 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 EFSA;
- 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.

9. 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. Participants in the FSS program work closely with their FSS support

specialist to identify family needs in a holistic manner and to develop the Individual Training and Services Plan (ITSP) component of the Contract of Participation. The ITSP identifies the final goals the participant will complete while enrolled in the program and the interim goals and activities that will be required in reaching those goals. The FSS support specialist will assist the participant in setting specific, measurable, attainable, realistic and time-bound (SMART) goals that will guide future actions. While on the FSS program, participants must work with their FSS support specialist to report progress towards their ITSP goals within the assigned timeframes. The FSS support specialist will support participants in locating and securing resources in the community to assist in meeting their goals and will help eliminate barriers to completing the goals whenever possible.

10. Program Termination; Withholding of Services; Available Grievance Procedures

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

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. For FSS participants with a Housing Choice Voucher or Project Based 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 or BHP. 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 or BHP Section 8 Administrative Plan.

Termination Process

The CoP will be terminated before the expiration of the contract term, and any extension thereof, for any of the following reasons:

- Mutual consent of the parties.
- Family's withdrawal from the FSS program.

- If the FSS participant's housing assistance is terminated.
- The failure of the FSS family to meet its obligations under the Contract of Participation without "good cause". The FSS team will determine if there is "good cause" for not meeting the contract obligations. In general, "good cause" means a circumstance beyond the family's control that directly prevents the participant from meeting the obligations of the contract. An extension will be offered if the FSS team determines "good cause"
- Such other act as is deemed inconsistent with the purpose of the FSS program.
- The head of the FSS family becomes permanently disabled and other family members will not participate in FSS as the head of the FSS family.
- In a Section 8 FSS program, failure to comply with the contract requirements because the family has moved outside the jurisdiction of the PHA under portability without continued FSS participation.
- If a participant fails to report progress to their FSS support specialist in a timely manner. After six months without contact, the FSS team may begin the termination process outlined below.

If a FSS participant has not been in contact with their FSS Support Specialist for 6 months, a letter will be sent asking that the participant contact their FSS Support Specialist within 30 days. If after 30 days, there is no contact from the participant, a second letter will be sent out with a date by which the participant needs to make contact. If the participant doesn't reach out after the second letter a final letter will be sent with a deadline date. If the FSS Support Specialist doesn't hear from the participant by the deadline date, the FSS Support Specialist may terminate the FSS participant's Contract of Participation. All letters will be mailed and emailed to the FSS participant. The FSS participant will be notified of the Appeal Process by mail, certified mail and email.

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.

11. 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 HCV or PBV program or the family's right to occupancy in accordance with its lease.

12. 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.

13. 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

14. Program Coordinating 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, community members and at least one BCHA or BHP voucher holder. 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.

15. Other Required Policies

ITSP modifications

The FSS participant's ITSP will be reviewed at least annually by the participant and the FSS Support Specialist. This review will be used to determine whether or not there have been any changes to the participant's situation, circumstances, or goals that may need to be adjusted, added, or changed. The FSS participant's ITSP may be modified at any time during the contract period when modifications to the ITSP improve the participant's ability to complete their obligations in the contract.

Contract Extensions

The initial contract term is five years. The contract may be extended for up to two additional years if the family is unable to achieve self-sufficiency in this time due to circumstances that are beyond their control such as:

- Serious illness in the immediate family;

- Involuntary loss of employment;
- Serious injury that interferes with employment opportunities; and/or
- Other circumstances that are beyond the control of the family and that are deemed as good cause by FSS staff.

All requests for extension must be submitted in writing prior to expiration of the Contract of Participation. The request letter should include the following components:

1. An explanation of why the goals were not completed;
2. What goals still need to be completed; and
3. The time frame in which the goals will be completed.

Participants will be notified in writing of the FSS team’s decision within ten (10) business days and may request an informal hearing if they disagree with the decision (see Hearing Procedures). During the extension period, the family will continue to be eligible to receive deposits into the FSS Escrow Account. The FSS Head of Household will be required to continue abiding by the Contract of Participation and Individual Training and Services Plan, as well as keep in regular contact with a FSS support specialist during the extension.

Forfeited Escrow

Amounts in the FSS escrow account shall be forfeited upon the occurrence of the following:

- The COP is terminated; or,
- The COP is completed by the family, but the FSS family is receiving welfare assistance at the time the COP term expires, including any extension thereof.

Forfeited escrow funds will be used for the benefit of the FSS participants. Specifically, such funds may be used for the following eligible activities:

- Support for FSS participants in good standing, including, but not limited to, transportation, child care, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the COP;
- Training for FSS support specialists;
- Other eligible activities as determined by the Secretary

FSS participants who wish to request funds from this source will be required to submit a request in writing indicating the amount being requested, how the funds will further

their ITSP goal progress, an invoice/estimate of the service requested, and documentation that other means to meet this request have been exhausted.

Documentation of Goal Completion

The FSS program will require documentation of ITSP goal completion, as well as verification that the head of the FSS family is not receiving TANF benefits, in order for the participant to graduate successfully from the FSS program. To confirm that the ITSP goals were achieved, the FSS support specialist may request such documentation as paystubs or employer letter verifying employment, certificates from financial or homeownership workshops, documentation of certificate or degree completion from an educational institution, or any other documentation that would confirm that the ITSP goal was completed.

Designation of the “Head of FSS Family”

The contract shall be signed by a representative of the PHA and the head of FSS family, as designated by the family. This head of FSS family does not have to be the same as the official head of household for rental assistance purposes. The PHA will meet with the family and detail the obligations, rights, and privileges that pertain to the FSS head of family, and the family will determine which adult household member will be the head of FSS family. Each adult family member will certify their agreement as to their designated head of the FSS family by signing a form for this purpose.

When the designated head of the FSS family ceases to reside with other family members in the assisted unit, the remaining family members may designate another family member to be the FSS head of family and the CoP will be updated.

The family may request to change the head of FSS family, in writing, during the FSS contract term. If the family requests to change the head of FSS family, each adult family member will certify their agreement to changing the designated head of the FSS family by signing a form for this purpose and the CoP will be updated.