City of Chandler Housing and Redevelopment's Family Self-Sufficiency Action Plan

Effective 7/1/2024

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I. INTRODUCTON

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by ***City of Chandler Housing and Redevelopment Division***. It was submitted to HUD on September 30*, 2022*.

The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of HUD assistance with public and private resources in order to enable eligible families to make progress toward economic security.

The purpose of the FSS Action Plan is to establish policies and procedures for carrying out the FSS program in a manner consistent with HUD requirements and local objectives.

This FSS Action Plan describes the ***City of Chandler Housing and Redevelopment Division***'s local polices for operation of the FSS program in the context of federal laws and regulations. The FSS program will be operated in accordance with applicable laws, regulations, notices and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.

The FSS program and the functions and responsibilities of PHA staff are consistent with the ***City of Chandler Housing and Redevelopment Division***'s personnel policy and Agency Plan.

II. PROGRAM OBJECTIVES

The City of Chandler Housing and Redevelopment Division's FSS program seeks to help families make progress toward economic security by supporting the family's efforts to:

- Increase their earned income
- Build financial capability

Achieve their financial goals

III. PROGRAM SIZE AND CHARACTERISTICS

III. A. Family Demographics

These tables describe the demographics of the population expected to be served by the ***City of Chandler Housing and Redevelopment Division***'s Action Plan.

The FSS program will serve the following housing assistance programs:

☒ Public Housing,

☒ Housing Choice Vouchers (HCV): Tenant-Based Vouchers

☒ Emergency Housing Vouchers (EHV)

Ages of Head of Household and Other Adults

	Percent
Ages of Head of Household	
--Head of Household is age 24 years or younger	1 %
--Head of Household is age 25 to 50	52%
--Head of Household is age 51 to 61	22%
--Head of Household is age 62 or greater	25%
Ages of Other Adults in Household	
-- Age 24 years or younger	55%
-- Age 25 to 50	31%
-- Age 51 to 61	7%
-- Age 62 or greater	7%

Presence and Ages of Children

	Percent
Presence and Ages of Children	
--Households that only include adults over age 18	56%
--Households that include one or more child age 13-17	34%
--Households that include children who are all 12 or younger	10%

Employment Status of Population to be Served

	Percent
Employment Status of Head of Household	
--Families with an employed head	44%
--Families whose head is unemployed	56%
Employment Status of All family members	
--Families with any member that is employed	46%
--Families with no employed member	54%

Annual Earned Income of Population to be Served

	Percent
Annual household earnings <$5,000 per year	10%
Annual household earnings between $5,000 and $9,999	25%
Annual household earnings between $10,000 and $14,999	32%
Annual household earnings between $15,000 and $19,999	11%
Annual household earnings between $20,000 and $24,999	7%
Annual household earnings between $25,000 and $29,999	5%
Annual household earnings between $30,000 and $34,999	6%
Annual household earnings of $35,000 or higher	4%

Elderly/Disability Status of Population to be Served

	Percent
Elderly/Disability Status of Head of Household	
--Head of Household is an elderly person without disabilities	9%
--Head of Household is an elderly person with disabilities	16%
--Head of Household is a non-elderly person without disabilities	16%
--Head of Household is neither an elderly person nor a person with disabilities	59%
Elderly/Disability Status of All Household members	
--Household includes an elderly person without disabilities	3%
--Household includes an elderly person with disabilities	6%
--Household includes a non-elderly person with disabilities	10%
--Household includes no elderly persons or persons with disabilities	81%

Race and Ethnicity of Population to be Served (required)

Race		Non-Hispanic	Hispanic
White	32%	32%	36%
Black or African-American	25%	43%	32%
American Indian or Alaska Native	6%	62%	32%
Asian	1%	67%	32%
Native Hawaiian or other Pacific Islander	0%	68%	42%
Other Race	0%	68%	42%

III.B. Supportive Service Needs

Supportive Services Needs of Families Expected to Participate in FSS

The following is a list of the supportive service needs of the families expected to enroll in the ***City of Chandler Housing and Redevelopment Division's*** FSS program:

- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerated basic skills instruction
- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for childcare
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Access to counseling or treatment for substance abuse and mental health
- Dental care, health care, and mental health care including substance abuse treatment/counseling
- Homeownership readiness

This list of supportive services needs is based on:

☒ Experience with past FSS or other supportive service program participants

☒ Input from the PCC or other service provider partners

☒ A needs assessment completed on FSS ***enrollment date***

III.C. Estimate of Participating Families

Over time, ***City of Chandler Housing and Redevelopment Division*** hopes to serve all families who are interested in participating in the FSS Program. The number of spaces available in the program at any given time, however, will be limited by the program's resources, including the number of FSS coordinators funded to work with FSS participants. New families will be admitted to the FSS program as space permits.

In recent years, the ***City of Chandler Housing and Redevelopment Division*** has been funded for ***two (2)*** coordinators. The minimum number of participants required to be served based on this funding is Zero Mandatory, ***60 voluntary Public Housing and 60 voluntary Housing Choice Voucher***, for each program with a goal to increase by 10 for each caseload by end of fiscal year.

Historically, ***the City of Chandler Housing and Redevelopment Division***'s FSS program has enrolled 10 new families into the FSS program each year. Accordingly, ***the City of Chandler Housing and Redevelopment Division*** expects to be able to provide FSS Services to 170 families over a five-year period.

Therefore, as of the time of preparation of this Action Plan, the ***City of Chandler Housing and Redevelopment Division*** expects to be able to serve ***140*** families in the FSS program at any one time.

III. D. Other Self-Sufficiency Programs

The ***City of Chandler Housing and Redevelopment Division*** except to enroll into FSS families from the self-sufficiency programs checked in the table below.

Name of Program	Check box if applicable
Emergency Housing Voucher (EHV)	☒

IV. Family Selection Procedures

A. Waiting List

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

B. Admissions Preferences

The FSS program has not adopted any admissions preferences. Families will be selected based on the following selection method:

Selection Method	
Date the family expressed an interest in participating in the FSS program	☒

C. Screening for motivation.

The ***City of Chandler Housing and Redevelopment Division*** will use one or more motivational screening factors to measure the family's interest and motivation to participate in the FSS program. The following screening criteria will be used:

☐ **Orientation Session:** The ***City of Chandler Housing and Redevelopment Division*** will screen families for motivation to participate in the FSS program by requiring that families who apply to enroll in the FSS program attend an initial orientation session. Each family will be given two opportunities to attend the orientation session and may request accommodation if unable to attend a scheduled orientation session. Accommodations will be offered on a case-by-case basis, depending on the needs of the applicant. Accommodations may include an individually scheduled orientation session, provision of transportation to/from the orientation site, translation services, an alternative location, a virtual orientation session, or allowance and encouragement to bring children to the session, where possible.

D. Compliance with nondiscrimination policies

It is the policy of *the* ***City of Chandler Housing and Redevelopment Division*** 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, *the* ***City of Chandler Housing and Redevelopment Division***'s FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).

The FSS program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS coordinators will review the file in the staff review meeting to ensure that non-selection is not based on discriminatory factors before the final decision is made. Applicants will be notified in writing of the reason(s) they were not selected for participation and will have the opportunity to appeal the decision (see Hearing Procedures). At all times, ***the City of Chandler Housing and Redevelopment Division*** will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

PHA Policy:
Reasonable Accommodation Requests: Persons with a disability or those who require a reasonable accommodation, modification, and auxiliary aids and services may submit a request at any time. Requests may include (but are not limited to) documents in large print or Braille, readers, sign language interpreters, or assistance explaining forms. Requests may be made to the City of Chandler Housing and Redevelopment Division by calling 480-782-3200 (*711 via Arizona Relay Service, TTY English 800-367-8939 or Español 800-842-2088); faxing 480-782-3220;
emailing **chandler.housing@chandleraz.gov** or **housing.residents@chandleraz.gov**; or mailin g written a request to City of Chandler Hosing Housing and Redevelopment Division, Mail Stop 101, P.O. Box 4008, Chandler, AZ 85244-4008.

Language Assistance: Persons with limited English proficiency are entitled to language assistance with written or oral communication. These services are available at no cost. To obtain language assistance, contact our office by calling 480-782-3200.

E. Re-enrollment of prior FSS participants

The following previous FSS families will be allowed to re-enroll in ***the City of Chandler Housing and Redevelopment Division's*** FSS program:

☒ FSS program graduates ***[three years or more since graduation, if applicable]***

☒ FSS participants who have withdrawn voluntarily ***[one year or more from date of exit, if applicable]***

☒ Families involuntarily terminated ***[one year or more from date of exit, if applicable]***

☒ Family members who were not Heads of FSS Family previously

The following conditions apply to re-enrollment:

The re-enrollment of a prior FSS participant will be approved one time only.

F. Head of FSS Family

The head of the FSS family is designated by the participating family. The in ***the City of Chandler Housing and Redevelopment Division*** may make itself available to consult with families on this decision but it is the assisted household that chooses the head of FSS family that is most suitable for their individual household circumstances. The designation or any changes by the household to the Head of FSS Family must be submitted to the in ***the City of Chandler Housing and Redevelopment Division*** in:

☒ Writing

V. Outreach

The ***City of Chandler Housing and Redevelopment Division*** will conduct widespread outreach to encourage enrollment in the FSS program. Outreach efforts will include the activities identified through the checked boxes below: Interpreters will be used as needed and clients may contact staff to express interest in person, via our toll-free telephone number or by email.

Outreach Methods	Details, including frequency
☒ Posting information about FSS on ***the City of Chandler Housing and Redevelopment Division***'s website	FSS "Success story" video posted on website.
☒ Posting FSS program flyers in locations likely to be seen by eligible families	Monthly.
☒ Providing information about the FSS program during scheduled reexaminations	Once a year at annual reexaminations.
☒ Providing information about the FSS program at voucher orientation sessions	At all scheduled voucher orientation sessions.
☒ Holding well-publicized information sessions about FSS	At housing authority scheduled events.
☒ Providing information about the FSS program to eligible families by mail	At least once a year, dependent upon budget

Outreach informational material about the FSS Program will include information about:

- Program overview
- Program benefits
- Available resources
- Participant responsibilities
- Program outcomes

Outreach efforts will be targeted equally to all families, using materials in both English and other commonly spoken languages to ensure that non-English and limited English-speaking families receive information and have the opportunity to participate in the FSS Program. In conducting outreach, ***the City of Chandler Housing and Redevelopment Division*** will account for the needs of person with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible who wish to participate are able to do so.

VI. FSS Escrow Account and Other Incentives for Participants

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account, as well as any additional incentives offered by the ***City of Chandler Housing and Redevelopment Division***, are described below.

A. Additional Incentives

While the ***City of Chandler Housing and Redevelopment Division***'s FSS program does not provide any other financial incentives for FSS participants, it does provide coaching services, as well as referrals to other service providers, that can be very valuable for FSS program participants.

B. Interim Disbursements

The ***City of Chandler Housing and Redevelopment Division*** will allow for interim disbursements on a case-by-case basis: Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP).

Requests may be made in writing. Requests may be made through the term of the Contract of Participation. Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment. Certainly guidelines / limitations apply to interim disbursement requests, as noted in the table below. The FSS Coordinator and an administrative staff representative of the ***City of Chandler Housing and Redevelopment Division*** will consider requests for interim disbursement in light of these policies and applicable federal requirements.

Specific guidelines / limitations apply to interim disbursement requests for the expenditure types checked in the box below.

Expenditure Type	**Guidelines / Limitations**
☒ Debt repayment	☒ Requests will be considered on a case-by-case basis ☒ An interim disbursement for debt repayment may not exceed 10% of the participant's escrow savings.
☒ Car purchase	☒ The maximum interim disbursement that will be allowed for a car purchase is: ***$10,000*** ☒ Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach

	☒The terms of any car purchase or car loan will be carefully scrutinized to ensure the terms are reasonable. ☒ Head of FSS Household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle. ☒ Requests will be considered on a case-by-case basis

C. Uses of forfeited escrow funds.

Treatment of forfeited FSS escrow account funds. FSS escrow account funds forfeited by the FSS family (if any) will be used to support FSS participants in good standing. Upon written request from a family, the FSS Coordinator and a member of the PCC will consider the available funds and make a determination.

The ***City of Chandler Housing and Redevelopment Division*** may also initiate a request for the use of forfeited escrow funds.

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

Forfeited FSS escrow funds may be deployed:

☒ Any time during the term of a household's CoP

Use of forfeited escrow funds for eligible uses (described below) may be requested by:

☒ ***City of Chandler Housing and Redevelopment Division***

Eligible uses of forfeited escrow funds include, but are not limited to:

Eligible Uses	Guidelines / Limitations
☒ Purchasing a vehicle	☒ Requests will be considered on a case-by-case basis
☒ Child Care	☒ Requests will be considered on a case-by-case basis
☒ Training for participants	☒ Requests will be considered on a case-by-case basis
☒ Employment or Educational Costs, including: ☒ Employment training ☒ Education costs (books, fees, uniforms, tools,	☒ Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach
☐ Training for FSS Program staff	☒ Requests for funding must be approached by ***[entity (e.g., the PCC)]***

VII. Family Activities and Supportive Services

As described in the next section, all families participating in the FSS program will benefit from coaching that helps them identify and achieve goals that the family selects. Drawing on partners on the program coordinating committee and relationships with other service providers, the coaches will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals:

Supportive Service Category	**Specific Service**	**Source/Partner**
☒ **Assessment**	☒ Vocational Assessment Educational ☒ Assessment Disability Assessment ☒ Disability Other specialized assessments	Maricopa Community College Career Outreach Arizona @ Work Ability 360
☒ **Child Care**	☒ Infant Care / Toddler Care Preschool Care ☒ Afterschool Care ☒ Homework Assistance	Sunrise Preschool/Tots Unlimited City of Chandler Parks & Recreation Kids Club Boys & Girls Club ICAN
☒ **Transportation**	☒ Bus passes ☒ Assistance with car repairs ☒ Assistance with car purchase	Valley Metro Restoration Rides Ministry
☒ **Education**	☒ High School Equivalency/GED ☒ English as a Second Language ☒ Post-secondary certificates ☒ Advanced Degrees	Chandler Public Library Friendly House Si Se Puede Foundation Maricopa Community Colleges ASU, GCU
☒ **Skills Training**	☒ Training in Executive Function ☒ Basic Skills Training ☒ Emerging Technologies Training ☐ ☒Biomedical Training (including CNA, phlebotomy, x-ray and other tech, etc.) ☒ On-the-Job Training ☒ Apprenticeships ☒ Skilled Labor training	Fresh Start Dress for Success Chicanos Por La Causa AWEE, Inc. MAXIMUS Father Matters MesaCAN/A New Leaf

☒ **Job Search Assistance**	☒ Resume Preparation ☒ Interviewing Skills ☒ Dress for Success ☒ Workplace Skills ☒ Job Development ☒ Job Placement	Dress for Success MAXIMUS Arizona @ Work Father Matters MesaCAN/A New Leaf
☒ **Micro and Small Business Development**	☒ Small business development services ☒ Small business Mentoring ☒ Entrepreneurship Training	Small Business Administration (SBA), MesaCAN/A New Leaf City of Chandler Chamber of Commerce
☒ **Health/Mental Health Care**	☒ Alcohol and Drug Abuse Prevention ☒ Alcohol and Drug Abuse Treatment ☐ Primary care ☐ Dental services ☐ Mental Health Services ☒ Health Insurance Advising	Mercy Maricopa Integrated Health Al Anon/Ala Teen Info Center Community Bridges Magellan Chandler Care Center
☒ **Crisis Services**	☒ Crisis Assessment ☒ Crisis Intervention ☒ Crisis Management ☐ Crisis Resolution	Impact 24-Hour Crisis Line Al Anon/Ala Teen Info Center Community Bridges Magellan City of Chandler Fire Dept. Family Resource Center/Child Crisis Center Terroz City of Chandler Victims Assistance My Sister's Place Center Against Family Violence Chicanos Por La Causa Chrysalis 24 hour Domestic Violence Hotline

☒ **Child/Adult Protective Services**	☒ Information Referral	Senior Helpline Child Abuse 24 hour Hotline Child Crisis Center Mesa State of AZ child abuse hotline
☒ **Homeownership Preparation**	☒ Homeownership Education ☒ Housing Counseling ☒ Down payment Assistance ☒ Other Homeownership Assistance	Newtown Trellis Habitat for Humanity NACA
☒ **Financial Empowerment**	☒ Financial education ☒ Financial coaching ☒ Banking services ☒ Training in money management	Newtown Trellis A New Leaf NACA
☒ **Individual Development Accounts**	☒ Matched Savings Accounts	Newtown Trellis A New Leaf NACA
☒ **Legal Services**	☒ Legal Services	Community Legal Services Friendly House Catholic Charities
☒ **Debt Resolution & Credit Repair**	☒ Assistance negotiating the resolution of past-due debt	Newtown Trellis A New Leaf

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

A. Identifying Family Support Needs

To help determine the supportive services needs of each family, the FSS coordinator will work with the family to complete an initial informal needs assessment for that family before completion of the initial Individual Training Service Plan (ITSP) and signing of the contract of participation. After enrollment in the FSS program, the FSS coordinator may make referrals to partner agencies for completion of one or more formal needs assessments. These assessments may focus on such issues as: employment readiness and employment training needs, educational needs related to secondary and

post-secondary education, financial health, and other topics, depending on the needs and interests of the family.

The formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.

B. Delivering Appropriate Support Services

Coaching. All families who participate in the FSS program will be assigned an FSS coordinator who will provide coaching services to help each participating family to:

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

C. Transitional supportive service assistance.

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

IX. Contract of Participation

All families enrolled in the FSS program will be required to sign a Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). This section describes the contents of the CoP and the ***City of Chandler Housing and Redevelopment Division***'s policies and practices regarding the CoP.

A. Form and content of contract

The CoP, which will incorporate one ITSP for each participating member of the family, sets forth the principal terms and conditions governing participation in the FSS program. These include the rights and responsibilities of the FSS family and of the ***City of Chandler Housing and Redevelopment Division***, the services to be provided to, and the activities to be completed by, each adult member of the FSS family who elects to participate in the program.

B. ITSP goals

Each individual's ITSP will establish specific interim and final goals by which the ***City of Chandler Housing and Redevelopment Division*** and the family will measure the family's progress towards fulfilling its obligations under the CoP. For any FSS family that is a recipient of welfare assistance at the outset of the CoP or that receives welfare assistance while in the FSS program, the ***City of Chandler Housing and Redevelopment Division*** will establish as a final goal that every member of the family become independent from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.

C. Determination of suitable employment

As defined in the FSS regulations (24 CFR 984.303(4)(iii)), a determination of what constitutes "suitable employment" for each family member with a goal of seeking and maintaining it will be made by the ***City of Chandler Housing and Redevelopment Division***, with the agreement of the affected participant, based on the skills, education, job training and receipt of other benefits of the family member and based on the available job opportunities within the community.

D. Contract of Participation term and extensions

The CoP will go into effect on the first day of the month following the execution of the CoP. The initial term of the CoP will run the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. Families may request up to two one-year extensions and are required to submit a written request that documents the need for the extension. The ***City of Chandler Housing and Redevelopment Division*** will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

(i) Circumstances beyond the control of the FSS family, as determined by the ***City of Chandler Housing and Redevelopment Division***, such as a serious illness or involuntary loss of employment;

(ii) Active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension (e.g. completion of a college degree during which the participant is unemployed or under-employed, credit repair towards being homeownership ready, etc.) as determined by the ***City of Chandler Housing and Redevelopment Division*** or

(ii) Any other circumstances that the ***City of Chandler Housing and Redevelopment Division*** determines warrants an extension.

Family circumstances

- Death in the family
- Serious illness
- Medical emergency
- Mandatory court appearances
- Involuntary loss of employment
- Loss of head of household through death, incarceration, or removal from lease
- Change in the ITSP improving progress toward economic self-sufficiency

Community circumstances

- Significant reduction in workforce (over 20 percent reduction in employment field)
- Significant interruption in service delivery (over 3 months interruption)
- Provider noncompliance with regulation
- Provider unable/unwilling to provide service
- Provider offering inferior service

E. Completion of the contract

The CoP is completed, and a family's participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members' ITSPs, on or before the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed. The ***City of Chandler Housing and Redevelopment Division*** will accept the following form of verification for completion of the ITSP goals:

The ***City of Chandler Housing and Redevelopment Division*** will require a combination of self-certification and third-party verification to document completion of ITSP goals.

F. Modification

The ***City of Chandler Housing and Redevelopment Division]*** and the FSS family may mutually agree to modify the CoP with respect to the ITSP and/or the contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by the ***City of Chandler Housing and Redevelopment Division*** as well as the Head of FSS Family.

The ***City of Chandler Housing and Redevelopment Division*** will allow for modifications to the CoP under the following circumstances:

☒ When the modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency

☒ When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, after consultation with the ***City of Chandler Housing and Redevelopment Division]***, designate another family member to be the FSS head of family

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

The ***City of Chandler Housing and Redevelopment Division*** will allow modifications at any time during the term of the CoP

G. Consequences of noncompliance with the contract

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

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

Program Termination

A. Involuntary Termination

The***/ City of Chandler Housing and Redevelopment Division*** may involuntarily terminate a family from FSS under the following circumstances:

I. If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan and related documentation. Non-compliance includes:

i. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance

ii. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities

iii. Failure to complete activities and/or goals within the specified time frames; and/or

II. If the participant's housing assistance has been terminated.

Participants who fail to meet their obligations under paragraph I above, as determined by an FSS coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned ***City of Chandler Housing and Redevelopment Division*** representative to review the situation. At this meeting, a review of the Contract of Participation, Individual Training and Services Plan, 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 fourteen (14) days of a written request by the FSS program to set up 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, 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 (see *Grievance Procedures*);
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. 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.

B. Voluntary Termination

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

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

C. Termination with Escrow Disbursement

In most cases, families whose FSS contracts are terminated will not be entitled to disbursement of their accrued FSS escrowed funds. However, the CoP will be terminated with FSS disbursement when one of the following situations occurs:

(i) Services that the ***City of Chandler Housing and Redevelopment Division*** and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.

(ii) The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the ***City of Chandler Housing and Redevelopment Division*** and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.

(iii) A FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR §982.353) for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

D. Grievance Procedures

The ***City of Chandler Housing and Redevelopment Division***'s PHA Plan details the ***City of Chandler Housing and Redevelopment Division***'s Grievance Procedures (See ***PHA Policy section reference or page number below***).

PHA Policy

The grievance and informal hearing procedures for the FSS program will be the same as the grievance and hearing procedures adopted for the public housing and housing choice voucher programs in the PHA's admissions and continued occupancy policy and administrative plan, respectively. (In the Public Housing Admissions and Continued Occupancy Policy, refer to Chapter 14-Grievances and Appeals. In the HCV Administrative Plan, refer to Chapter 16-Program Administration, Part III Informal Reviews and Hearings.)

XI. 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 the ***City of Chandler Housing and Redevelopment Division***'s decision of whether to admit the family into the ***City of Chandler Housing and Redevelopment Division's Family Self-Sufficiency*** 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.

The ***City of Chandler Housing and Redevelopment Division*** will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.

XII. Timetable

The City of Chandler Housing and Redevelopment Division implemented its FSS program since 1991 and will continue to implement it per this FSS Action Plan.

XIII. 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 should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's reasonable accommodations policy. The policy is available online at ***http://affordablehousing/chandleraz.gov***

PHA Policy:

Reasonable Accommodation Requests: Persons with a disability or those who require a reasonable accommodation, modification, and auxiliary aids and services may submit a request at any time. Requests may include (but are not limited to) documents in large print or Braille, readers, sign language interpreters, or assistance explaining forms. Requests may be made to the City of Chandler Housing and Redevelopment Division by calling 480-782-3200 (*711 via Arizona Relay Service, TTY English 800-367-8939 or Español 800-842-2088); faxing 480-782-3220;
emailing **chandler.housing@chandleraz.gov** or **housing.residents@chandleraz.gov**; or mailin g written a request to City of Chandler Hosing Housing and Redevelopment Division, Mail Stop 101, P.O. Box 4008, Chandler, AZ 85244-4008.

Request for Effective Communications

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

Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator's response, the family may submit a request in writing in accordance with the agency's effective communications policy. The policy is available online at
http://affordablehousing/chandleraz.gov

Limited English Proficiency

The ***City of Chandler Housing and Redevelopment Division*** will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available online at ***http://affordablehousing/chandleraz.gov***

PHA Policy:

Language Assistance: Persons with limited English proficiency are entitled to language assistance with written or oral communication. These services are available at no cost. To obtain language assistance, contact our office by calling 480-782-3200.

XIV. Coordination of Services

A. 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, childcare, 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.

B. Program Coordinating Committee

The principal vehicle for ensuring ongoing coordination of services is the program coordinating committee (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 ***quarterly*** 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.

3. Representatives from a variety of agencies and individuals, which include but are not limited to the following: **The East Valley Alliance, ADES, MAXIMUS, NEWTOWN, TRELLIS, ASU Family Resources, SRP Utilities, A New Leaf, Arizona @ Work, City of Phoenix Housing Authority, Housing Authority of Maricopa County, Maricopa Integrated Health System, and Habitat for Humanity.**

XV. FSS Portability (Applicable to HCV Only)

A. Portability in initial 12 months

FSS participants may not exercise portability within the initial 12 months after signing a CoP.

B. Moves into the PHA's jurisdiction

If an FSS participant moves into the PHA's jurisdiction, they will be admitted in good standing into the ***City of Chandler Housing and Redevelopment Division***'s FSS program unless the ***City of Chandler Housing and Redevelopment Division*** 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.

C. FSS termination with disbursement for porting families

If a FSS family seeks to move to a jurisdiction that does not offer an FSS program, the ***City of Chandler Housing and Redevelopment Division*** will closely examine the family's progress to determine if it would be appropriate to exercise FSS Termination with Disbursement as discussed above in the section on Termination.

Where continued FSS participation is not possible, ***City of Chandler Housing and Redevelopment Division*** will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR § 984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS program.

XVI. Other Policies

Policy	**Where Addressed in Plan**
(i) Policies related to the modification of goals in the ITSP;	Section IX Contract of Participation
(ii) The circumstances in which an extension of the Contract of Participation may be granted	Section IX: Contract of Participation
(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any)	Section VI: FSS Escrow Account and Other Incentives for Participants
(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing	Section VI: FSS Escrow Account and Other Incentives for Participants

(v) Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating	Section IV. Family Selection Procedures
(vi) Policies on requirements for documentation for goal completion;	Section IX: Contract of Participation
(vii) Policies on documentation of the household's designation of the "Head of FSS Household;	Section IV. Family Selection Procedures
(viii) Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference)	Section IV: Family Selection Procedures

XVII. HOTMA

Impact of HOTMA on Family Self-Sufficiency (FSS) Programs

PHAs who operate FSS programs should note that families participating in the FSS program are subject to all HOTMA interim reexamination regulations. PHAs cannot implement local policy to perform an interim reexamination for increases in adjusted income below the 10% threshold for FSS participants.

Although families participating in FSS may experience fewer escrow increases under the HOTMA final rule, the revised IR regulations may provide these families the opportunity to use their increased earnings to realize other short or long-term goals outside of the scope of the FSS program.

The HOTMA interim reexamination regulations impact administration of the FSS program in the following ways:

1. FSS participants are subject to all requirements of the HOTMA interim reexamination regulations; and
2. At enrollment, PHAs may not perform an interim reexamination of annual income unless the family experienced a change in adjusted annual income that meets the threshold to perform an interim reexamination under the HOTMA final rule.
3. Families for whom their reexamination of income does not occur until their regularly scheduled annual reexamination will not have the opportunity to begin escrowing their increased earnings until that time and may have fewer escrow increases over the life of the 5-year contract.

HOTMA Resources

HOTMA Resources Page (Public Housing and HCV):

HOTMA Resources / HUD.gov / U.S. Department of Housing and Urban Development (HUD)

HUD Exchange (Public Housing and HCV only):

Materials Posted: HOTMA Income and Assets Training Series – HUD Exchange

XVIII. Definitions

The definitions below are specified in CFR 24 984.103. The terms 1937 Act, Fair Market Rent, Head of Household, HUD, Public Housing, Public Housing Agency (PHA), Secretary, and Section 8, as used in this part, are defined in 24 CFR Part 5.

Certification means a written assertion based on supporting evidence, provided by the FSS family or the ***City of Chandler Housing and Redevelopment Division***, as may be required under this part, and which:

(1) Shall be maintained by the ***City of Chandler Housing and Redevelopment Division*** in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification;

(2) Shall be made available for inspection by HUD, the ***City of Chandler Housing and Redevelopment Division***, and the public, as appropriate; and,

(3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or the ***City of Chandler Housing and Redevelopment Division***, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

Contract of Participation (CoP) means - a contract, in a form with contents approved by HUD, entered into between an FSS family and a ***City of Chandler Housing and Redevelopment Division*** operating an FSS Program that sets forth the terms and conditions governing participation in the FSS Program. The CoP includes all Individual Training and Services Plans (ITSPs) entered into between the ***City of Chandler Housing and Redevelopment Division*** and all members of the family who will participate in the FSS Program, and which plans are attached to the CoP as exhibits. For additional detail, see § 984.303.

Effective date of Contract of Participation (CoP) - means the first day of the month following the date in which the FSS family and the PHA entered into the CoP.

Eligible families means current residents of Public Housing (Section 9) and current Section 8 program participants, as defined in this section, including those participating in other local self-sufficiency programs.

Enrollment means the date that the FSS family entered into the CoP with the ***City of Chandler Housing and Redevelopment Division***.

Family Self-Sufficiency (FSS) Program means the program established by a PHA within its jurisdiction or by an owner to promote self-sufficiency among participating families, including the coordination of supportive services to these families, as authorized by section 23 of the 1937 Act.

FSS escrow account (or, escrow) means the FSS escrow account authorized by section 23 of the 1937 Act, and as provided by § 984.305.

FSS escrow credit means the amount credited by the ***City of Chandler Housing and Redevelopment Division*** to the FSS family's FSS escrow account.

FSS family means a family that resides in Public Housing (Section 9) or receives Section 8 assistance or receives HUD Project-Based Rental Assistance for a privately owned property, and that elects to participate in the FSS Program, and whose designated adult member (head of FSS family), as determined in accordance with § 984.303(a), has signed the CoP.

FSS family in good standing means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the ***City of Chandler Housing and Redevelopment Division***; and is in compliance with the regulations regarding participation in the relevant rental assistance program.

FSS related service program means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of ‘‘supportive services’’ set forth in this § 984.103.

FSS slots - refers to the total number of families (as determined in the Action Plan and, for mandatory programs, in § 984.105 of this part) that the PHA will serve in its FSS Program.

FSS Program Coordinator means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS participants; goal setting and case management/coaching of FSS participants; working with the community and service partners; and tracking program performance.

FY means Federal Fiscal Year (starting October 1 and ending September 30, and year designated by the calendar year in which it ends).

Head of FSS family means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent.

Housing Opportunity Through Modernization Act (HOTMA) is a Provision/Regulation/PIH 202-27 for the Public Housing and Housing Choice Voucher programs. On July 29, 2016, HOTMA was signed into law. HOTMA makes numerous amendments to Sections 3, 8, and 16 of the United States Housing Act of 1937(1937 Act), including significant changes to income calculation, net family assets, and income reviews.

Individual Training and Services Plan (ITSP) means a written plan that is prepared by the ***City of Chandler Housing and Redevelopment Division*** in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

(1) The final and interim goals for the participating FSS family member;

(2) The supportive services to be provided to the participating FSS family members;

(3) The activities to be completed by that family member; and,

(4) The agreed upon completion dates for the goals and activities.

Each ITSP must be signed by the ***City of Chandler Housing and Redevelopment Division*** and the participating FSS family member, and is attached to, and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS Program, including the head of FSS family who has signed the CoP.

Owner means the owner of multifamily assisted housing.

Self-sufficiency means that an FSS family is no longer receiving Section 8, Public Housing assistance, or any Federal, State, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS escrow account funds.

Supportive services mean those appropriate services that a ***City of Chandler Housing and Redevelopment Division*** will coordinate on behalf of an FSS family under a CoP, which may include, but are not limited to:

(1) *Childcare*—childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;

(2) *Transportation*—transportation necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment;

(3) *Education*—remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;

(4) *Employment Supports*—job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;

(5) *Personal welfare*—substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services;

(6) *Household management*—training in household management;

(7) *Homeownership and housing counseling*— homeownership education and assistance and housing counseling;

(8) *Financial Empowerment*—training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing and improving credit scores, etc.;

(9) *Other services*—any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD's legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act.

Welfare assistance means (for purposes of the FSS program only) income assistance from Federal, (i.e. Temporary Assistance for Needy Families (TANF) or subsequent program) State, or local welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs. Welfare assistance does not include:

(1) Nonrecurrent, short-term benefits that:

(i) Are designed to deal with a specific crisis or episode of need;

(ii) Are not intended to meet recurrent or ongoing needs; and,

(iii) Will not extend beyond four months.

(2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

(3) Supportive services such as childcare and transportation provided to families who are employed;

(4) Refundable earned income tax credits;

(5) Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF);

(6) Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;

(7) Amounts solely directed to meeting housing expenses;

(8) Amounts for health care;

(9) Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;

(10) Supplemental Security Income, Social Security Disability Income, or Social Security; and

(11) Child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child's need and not on the need of the child's current non-parental caretaker.