

STATE OF CONNECTICUT DEPARTMENT OF HOUSING  
J. D'AMELIA & ASSOCIATES

# Family Self-Sufficiency Program Action Plan

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DOH/JDA FSS program reserves the right to make addendums to this Action Plan as situations, regulations, and funding sources change, but such changes will be made in compliance with HUD's regulations.

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# **I INTRODUCTION**

## **Connecticut Department of Housing**

The Department of Housing strengthens and revitalizes communities by promoting affordable housing opportunities. The Department seeks to eliminate homelessness and to catalyze the creation and preparation of quality, affordable housing to meet the needs of all individuals and families statewide to ensure that Connecticut continues to be a great place to live and work.

The Department of Housing (DOH) works in concert with municipal leaders, public agencies, community groups, local housing authorities, and other housing developers in the planning and development of affordable homeownership and rental housing units, the preservation of existing multi-family housing developments, community revitalization and financial and other support for our most vulnerable residents through our funding and technical support programs. As the State's lead agency for all matters relating to housing, DOH provides leadership for all aspects of policy and planning relating to the development, redevelopment, preservation, maintenance and improvement of housing serving very low, low, and moderate income individuals and families. DOH is also responsible for overseeing compliance with applicable statutes, regulations and financial assistance agreements for funded activities through long-term program compliance monitoring.

The Department of Housing has been authorized to administer the Section 8 Housing Choice Voucher Program. In addition to the Section 8 Housing Choice Voucher Program, the unit maintains oversight of the Section 8 Moderate Rehabilitation Program, and the state-funded Rental Assistance Program (RAP).

### **Mission**

A Connecticut where affordable housing, in strong and vibrant communities, is accessible to individuals and families across the state and homelessness is a thing of the past.

### **Section 8 Housing Choice Vouchers**

The Housing Choice Voucher Program is the government's major program for assisting very-low-income families to afford decent, safe, and sanitary housing in the private market.

Participants are able to find their own housing, including apartments, townhouses, and single-

family homes. The participant is free to choose any private rental housing that meets the requirements of the program. *Section 8* Housing Choice Vouchers are federally funded through the Department of Housing and Urban Development (HUD) and is administered locally by over 40 Public Housing Agencies (PHAs) across the state and statewide by the Connecticut Department of Housing (DOH) and its agent, J. D'Amelia & Associates (JDA). JDA subcontracts operation of the DOH Housing Choice Voucher Program to seven local PHAs and one community action agency throughout Connecticut.

A family that is issued a Housing Voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. Rental units must meet minimum standards of quality and safety as determined by HUD. A housing subsidy is paid by the Public Housing Authority to the landlord directly on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program based on their income.

## **II PROGRAM OBJECTIVE**

The objective of the program is to assist families in obtaining employment that will allow them to become self-sufficient, reducing the dependency of low-income families on welfare assistance, voucher program assistance, public assistance, or any federal, state, or local rental programs.

To meet its objective the Department of Housing and its contracted agency J. D'Amelia & Associates will network with existing community services, social services providers, colleges, financial institutions, transportation providers, vocational schools, Department of Labor, businesses and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment and education.

### **Family Self-Sufficiency Program**

The Family Self-Sufficiency (FSS) Program is an employment and savings incentive program for low-income families that have Section 8 Vouchers. The (FSS) Program is intended to promote the development of local strategies for coordinating the use of Housing Choice

Vouchers with public and private resources to help eligible families achieve economic independence. Participation on the FSS program is voluntary for families; the program is open to current families participating in the Housing Choice Voucher Program who are unemployed or underemployed.

Families entering the FSS Program work with a case coordinator to develop goals that will, over a 5-year period, lead to self-sufficiency. When the family meets its goals and completes its FSS contracts, the family becomes eligible to receive funds deposited in an escrow account on its behalf throughout the family’s participation on the FSS Program. The amount credited to the family’s escrow account is based on increases in the family’s earned income during the term of the FSS contract.

**Family Demographics**

Initially, 150 families were subsidized under the FSS Program. The Department of Housing’s Section 8 allocation for the Family Self-Sufficiency Program did increase to a maximum program size of 396 families in 1998. Over the years the obligation has been reduced due to participants who have successfully completed the program. The following demographics were calculated based on the current 273 families.

[Editor’s note: the percentages have been removed from this sample Action Plan.]

**Employment**

	<b>Percent</b>
Head of household	
-- Households with an employed head	__%
-- Households whose head is unemployed	__%
All household members	
-- Households with any member that is employed	__%
-- Households with no employed member	__%

### Earnings

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

### Elderly / Disability Status

	Percent
Head of household	
-- Head of household is an elderly person without disabilities	__%
-- Head of household is an elderly person with disabilities	__%
-- Head of household is a non-elderly person with disabilities	__%
-- Head of household is neither elderly nor disabled	__%
All households members	
-- Household includes an elderly person without disabilities	__%
-- Household includes an elderly person with disabilities	__%
-- Household includes a non-elderly person with disabilities	__%
-- Household includes no elderly persons or persons with disabilities	__%

### Racial/Ethnic Percentages

	Non-Hispanic	Hispanic
Caucasian                   __%	__%	__%
Black or African-American                   __%	__%	__%

### **III PROGRAM COMPONENTS**

The FSS program has two main components: Case Coordination and Escrow accounts. Families receive Case Coordination and referral services to identify employment goals and supportive service programs available in the community to help achieve goals.

#### **Escrow**

Escrow deposits are calculated on increases in earned income as they impact the family's Total Tenant Payment (TTP) at the time the Contract of Participation is executed. Escrow credit calculations will be made whenever the Department of Housing and its agent J. D'Amelia conducts an interim or annual reexamination during the Contract of Participation. DOH/JDA will credit escrow accounts monthly and calculate interest monthly. At least annually, the Family Self-Sufficiency Coordinators will provide FSS families with an escrow statement reflecting beginning and ending balances, deposits, withdrawals, and interest accrued.

#### **Case Coordination**

The Department of Housing and its agent J. D'Amelia & Associates is not a direct service provider but rather disseminates information to participants and makes referrals on their behalf to partner agencies. FSS Coordinators will help participants to receive the services and support they need to achieve their goals by contacting partner agencies on their behalf, make referrals to organizations that work with participants in the completion of forms, applications and resumes and finally make referrals for supportive counseling such as career, credit, school and when requested, family, mental health and/or family counseling.

### **IV HOUSING AUTHORITY CONTRACT OF PARTICIPATION**

The contract will set forth the rights and responsibilities of both the client and DOH/JDA under the provisions of the Family Self – Sufficiency Program. The head of the FSS family must be the head of household for eligibility and rent determination purposes. The Individual Training and Service Plan (ITSP) will be attached to every contract. The services to be provided to each participating family member will be listed. The contract of participation will be executed no more than 120 days after the household's most recent annual or interim reexamination. A new reexamination will be completed if more than 120 days have elapsed. The initial term of the

Contract of Participation is five (5) years. DOH/JDA may grant an extension of up to two (2) years if the family gives a written request for the extension and if DOH/JDA finds that good cause exists for the extension.

Extensions will not be granted for loss of employment due to lack of performance on the part of the FSS participant. All requests for extensions must be submitted in writing prior to expiration of the Contract of Participation. The request letter should include the following components:

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

Participants will be notified in writing of DOH/JDA's decision within fourteen (14) business days and may request an informal hearing if they disagree with the decision (see Hearing Procedures below). 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, Program Agreement Form, and Individual Training and Services Plan, as well as keep in regular contact with a FSS coordinator during the extension.

The contract is considered to be completed, and a family's FSS participation is concluded, when:

- ❖ The family has fulfilled all of its obligations under the contract on or before the expiration of the contract; or
- ❖ 30 percent of the monthly adjusted income equals or exceeds the published Fair Market Rents for the family unit size under the DOH/JDA subsidy standards (even if the five years is not up) and no family member receives state welfare.

The participant will be considered to have completed all of its obligations when the family has completed the contract on or before the contract expiration date or extension; as defined by the Family-Self Sufficiency Regulations *24 CFR 984.305(c)*.

### **Interim Disbursement of FSS Funds**

The Department of Housing and its agent J. D'Amelia & Associates will allow the family to receive a portion of its escrow funds early under circumstances specified below. Participants in

good standing with Section 8 and the Section 8 FSS Program will be allowed to request money from their accounts prior to the completion of their Contract. The early withdrawal of funds must be used for continuing growth and for reaching the goals articulated in the ITSP. Withdrawals can only be made once during a twelve (12) month period. The family will be required to pay a portion of the overall cost of the item. All FSS families with an escrow balance are eligible to request a withdrawal.

The Family Self-Sufficiency Coordinators will determine that the family has fulfilled established interim goals and requires a portion of the FSS escrow account funds for the purpose consistent with the contract of participation. Before agreeing to an early disbursement, the FSS Coordinators will seek other sources for the funds needed so that the escrow account will not be depleted. The FSS staff will discuss the appropriateness of the request during a regularly scheduled meeting. The FSS Program reserves the right to request that the family attend a meeting for clarification of the withdrawal request before a determination is made and/or may require additional documentation prior to making a decision.

The decision to release escrow will be made by consensus of the staff members and the decision will be binding. If the withdrawal request is denied, the FSS family will be given a written response outlining the decision. Should the family not complete its FSS contract, the family is not required to repay the amount received as an interim disbursement unless the advance payment was made based on fraudulent information given by the family. Early disbursements of escrow funds may include and may not be limited to the following:

- ❖ Completion of college or graduate school (expenses related to education);
- ❖ Job training;
- ❖ Transportation expenses;
- ❖ Purchase of a home

### **Disbursement Procedure for Interim Withdrawal**

The head of household must submit a budget in addition to a written request for an interim. The request must include:

- ❖ The amount of money requested;

- ❖ The amount of money the family will be investing;
- ❖ How the funds will be used;
- ❖ How this will facilitate their movement towards self-sufficiency;
- ❖ An assessment of their progress on their self-sufficiency goals;
- ❖ Alternate funding sources they have tried and
- ❖ Documentation of expenses

All requests for early disbursements of FSS funds must be made in writing 30 days prior to stated use; no checks will be issued to a FSS participant. Checks will only be issued to the appropriate entity.

### **Final Disbursements/Contract Completion**

In order to successfully complete the FSS Contract of Participation and receive any money in the FSS Escrow Account, participants must meet the following criteria:

1. The head of household has obtained suitable full-time employment (as defined below) or has maintained part-time employment for a period of at least six (6) months.
2. All members of the household have been independent of welfare for at least twelve (12) consecutive months. Welfare is defined as income assistance from Federal or State Welfare Programs, and includes only cash maintenance payments designed to meet a family's ongoing basic needs. It does *not* include Food stamps, Social Security, Child Support payments, Medicaid, or similar benefits.
3. All activities listed on the Individual Training and Service Plan must be completed within the designated timeframes.
4. The household is in full compliance with the lease, including no monies owed for repayment agreements to DOH/JDA or the Section 8 landlord. Escrow payment is the amount in the family's (participant) account, less any money owed to the DOH/JDA Program. Before disbursement of the escrow account funds the FSS Coordinator will verify that the family does not owe a debt.

Alternatively, a family may graduate from FSS when 30 percent of the family's monthly adjusted income equals or exceeds the published Fair Market Rent for the family unit size under the DOH/JDA subsidy standards (even if the five years is not up), the head of household is employed and no family member receives state welfare. The participant will be considered to have completed all of its obligations when the family has completed the contract on or before the contract expiration date or extension; as defined by the Family-Self Sufficiency Regulations 24 *CFR* 984.305(c). To graduate under this alternative policy, a family must also comply with paragraph 4 above.

Full-time employment is defined as:

- ❖ For hourly or salaried employees – at least 32 hours per week
- ❖ For self-employment – net earnings (after business expense deductions) of at least 32 hours per week at minimum wage.

Accommodations for disabled individuals – A person with disabilities may request an accommodation to these employment standards. Requests for accommodation must be submitted in writing and supported by a written statement from the individual's medical provider at least 90 days prior to program completion. The statement will include a recommendation from the medical provider as to a specific number of hours that the individual is able to work due to disability. Requests will be considered on a case-by case basis.

Suitable employment is defined as follows:

- Employment with an established, legitimate business (the participant is receiving a regular paycheck from which taxes and other required deductions are withheld)
- Self-employment which is verifiable through signed Federal income tax returns (with Schedule C).
- Contracted or commission employment will be considered if it meets the hourly/income requirement, is verifiable, and is being declared for tax purposes.
- Informal employment which does not meet the criteria listed above will not be considered (employment where income is not declared for tax purposes).
- Employment must be considered a lawful activity.

## **Forfeiture of FSS Funds**

Funds in the FSS Escrow Account will be forfeited if:

- ❖ The Contract of Participation, including any extension, expires and the obligations are unfulfilled by the head of household.
- ❖ The FSS family loses their housing assistance due to violation of the Section 8 HCV family obligations;
- ❖ The FSS family is deemed to be non-compliance with the FSS program and is terminated;
- ❖ The FSS family voluntarily terminates their enrollment in the FSS program.

## **V. FAMILY SELECTION PROCEDURES**

### **Outreach/Recruitment**

Efforts will be targeted equally to minority and non-minority families to ensure that non-English and limited English speaking families receive information and have the opportunity to participate in the FSS Program. Efforts will also be made to serve persons with disabilities including, but not limited to, persons with impaired vision or hearing. Outreach efforts for the FSS Program may include, but are not limited to, distribution of FSS Program flyers to contracted housing authorities and partners (both private and public), mass mailing of program information to current DOH/JDA section 8 participant. Orientation presentations to incoming Section 8 clients. Interpreters will be used as needed and clients may contact staff via our toll-free telephone number or by email. Outreach informational material about the FSS Program may include:

- Program benefits
- Program information
- Available resources
- Participant responsibilities

It is the policy of Department of Housing and its agent J. D'Amelia & Associates to comply 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. 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 ground of race, color,

sex, religion, national or ethnic origin, family status, source of income, or disability. In addition, DOH/JDA'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).

### **Selection of Participants**

The FSS 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 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, DOH/JDA will select families for participation in the FSS program in accordance with HUD guidelines.

### **Waiting List**

As per HUD guidelines, DOH/JDA's FSS program may exercise its right to give preference on the FSS waiting list for up to 15 FSS slots to applicants or participants who are in a related service program. This preference will extend to FSS participants from other Housing Authorities who are porting to DOH/JDA, at the Department of Housing/ J. D'Amelia discretion. At all times, families who enter the selection process for the Family Self-Sufficiency Waiting List must be active recipients of the DOH/JDA Housing Choice Voucher Programs. DOH/JDA will utilize a first-come first-served selection system for the Family Self-Sufficiency Waiting List using date stamp on letters of interest received from tenants.

DOH/JDA clients who express an interest in the FSS Program may be screened before being enrolled in the program within the following HUD allowable guideline: mandatory participation in an FSS Program orientation on either a group or individual basis. The orientation will include a review of participant expectations, the services offered, and the requirements to complete the FSS Program. Those interested clients who have successfully completed the program orientation and express further interest in enrollment will be chosen for participation based on the following factors:

- ❖ Preference given to FSS participants porting to DOH/JDA from another Housing Authority Program.
- ❖ Preference given to participants of related service programs as described above.

If all FSS Program slots are filled, DOH/JDA's FSS coordinators will maintain an FSS Waiting List of families to be enrolled based on the above ordered criteria and families will be enrolled as slots become available.

DOH/JDA at its discretion, may deny participation in the FSS Program to a family that previously participated and was terminated from FSS because the family did not meet their obligations according to the Contract of Participation. DOH/JDA at its discretion, may allow a family that previously participated in the FSS Program and was terminated to sign a new Contract of Participation if the cause for termination of the original contract was due to circumstances beyond the family's control, such as a serious illness.

### **Orientation Sessions**

The Department of Housing and its agent J. D'Amelia & Associates will hold orientation sessions for all FSS participants. The rights and responsibilities of both participants and Housing Authorities will be outlined. A Contract of Participation, Understanding of Participation, and Program Agreement will be required for each participant and it will be discussed in detail during the orientation session.

## **VI. FAMILY ACTIVITIES/ SUPPORT SERVICES**

### **Incentives to Encourage Participation**

As part of the FSS program, Department of Housing and its agent J. D'Amelia & Associates offers incentives to encourage participation and enhance the participant's ability to achieve self-sufficiency. DOH/JDA will establish an FSS Escrow Account for each eligible participating family in accordance with HUD guidelines as a financial incentive for program participation. Additional incentives include, but are not limited to enhanced opportunities for education, training and employment. FSS participants have access to financial counseling, credit repair, homeownership workshops, and available resources about the home buying process. FSS participants also have a number of personal incentives for involvement including structured goal

planning, greater opportunity to increase their standard of living, an enhanced support system, increased self-esteem, etc. DOH/JDA reserves the right to revise this plan when and if additional official incentives can be offered.

### **Identification of Support Needs**

An assessment will be conducted to help program participants get started in the goal/need identification process. The FSS staff works with each person in the family who wishes to develop an Individual Training and Services Plan (ITSP) in a face-to-face interview process during the initial intake, in which the assessment tool is used as a facilitator to begin the goal planning process. The assessment addresses common issues faced by participants of self-sufficiency programs including, but not limited to: employment, job search and readiness, abuse issues, budget issues, child care issues, clothing needs, credit needs, drug and alcohol issues, educational issues, health/mental health issues, housing issues, medical coverage issues, parenting skills, support network needs, training needs, and transportation issues.

The purpose of the assessment tool is to help clients start thinking about the issues of real concern in their lives and the areas of their lives in which they can realistically hope to achieve some improvement. In conjunction with the ITSP, identified goals are then broken down into realistic action steps. Goal progress is tracked with each participant through monthly contact by letters phone and email, and or interviews every four (4) months. Goals may be revised during this period but must be approved by the FSS Coordinator. Goals may not be changed within the last 12 months of the Contract of Participation. The head of household is the only person required to have an ITSP, although other adult family members are welcome to work with the case manager to develop their own.

Comprehensive resources are available to FSS program participants through public and private agencies. In order to protect confidentiality, participants sign a Release of Information that allows FSS staff to coordinate with these agencies for the provision of services. The following is a list of services currently available to eligible FSS participants. We continue to include resources from many places throughout the community, which means that resources and services are in a constant state of change.

**Program overview of services:**

**Coordination:** Families participating in the FSS program will be in regular contact with an FSS Coordinator to develop and carry out the Individual Training and Services Plan. The case manager will provide ongoing supervision of the participant's progress and act as an advocate to empower families toward self-sufficiency. In addition, the case manager also can help FSS participants cope with crises that often get in the way of achieving employment objectives.

**Housing:** The FSS Coordinator may act as a liaison between program participants and their housing specialist to ensure **updates** are processed in a timely manner, bring any discrepancies to resolution in a positive fashion, and find possible solutions to problems as they occur.

**Escrow:** Deposits may be made into an escrow account on behalf of an FSS family. Amounts deposited will be calculated in accordance with Federal regulations for the FSS program (see FSS Escrow Account).

The state of Connecticut and local offices of the **Department of Social Services (DSS)** currently assist DOH/JDA's FSS participants with applications for Temporary Assistance for Needy Families (TANF), Medicaid, Snap, Childcare assistance, and other emergencies.

**Department of Labor (DOL)/CT Works/ Workforce Development Board** offer workshops on employment, computer training, Job Corps, resume writing, career development specialist to assist clients, and career counselors. DOL both makes and accepts referrals to/from DOH/JDA's FSS program DOL has provided on-the-job internships to FSS participants which have led to full-time employment. Participants on the DOH/JDA's program have utilized the collaboration of State agencies under the *Workforce Investment Act Program* for Education and Vocational Training.

**Bureau of Rehabilitation Services (DSS)** provides vocational testing, career counseling and additional financial assistance for educational programs to persons with disabilities; Bureau vocational Rehabilitation also provides psychological counseling.

**Care 4 Kids** helps low to moderate income families in Connecticut pay for child care costs. This program is sponsored by the State of Connecticut's Department of Social Services, the families in the program and the providers who take care of the children.

**Head Start** programs are readily accessible to most FSS participants.

**Women, Infants, and Children (WIC)** provides vouchers for infant formula and food for low-income pregnant women and **children** up to five years of age. All eligible FSS tenants are referred or information is provided to their local offices.

**Habitat for Humanity** provides decent **affordable** homeownership for families in our communities.

**Connecticut Housing Finance Authority (CHFA)** is a leader in creating affordable housing opportunities for families and individuals in Connecticut. Eight-hour homebuyer education courses are offered free-of-charge to anyone interested in learning about the path to homeownership and CHFA loan applicants year-round through its HUD-approved, participating counseling agencies located across the state.

The eight-hour course includes instruction in the financial and practical aspects of buying and maintaining a home as well as individual financial and credit counseling sessions. The class is offered on week day evenings and Saturdays to accommodate diverse schedules.

Many educational programs in the State of Connecticut including the **University of Connecticut, University of New Haven, University of Phoenix, Capital Community College, Manchester Community College, Naugatuck Valley Community College, Gateway Community College, Albertus Magnus College, Central Connecticut State University**; assist the DOH/JDA FSS participant in educational goals. Each educational program assists FSS tenants with applications for admission, applying for financial aid, deciding on a course of study, and other aspects of higher education. Participants are also referred to Graduate CT.

**Charter Oak State College** The program helps working single mothers earn an Associate and/or Bachelor's degree with the assistance of student financial aid. The online courses offered at Charter Oak State College allow mothers to earn their degree from the convenience and comfort

of their homes. The program is funded by donations and grants. **Program Offers:** Online college courses, Loan of a laptop and printer , Free dial-up Internet service, Reimbursement of a percentage of the cost for DSL and other services, Books provided for Charter Oak State College courses, Reimbursement of books for courses taken at other institutions and academic, career, and personal counseling. Scholarships are based on availability.

**Goodwin College “The Golden Ticket Program”** is a full scholarship program offered to any Family Self-Sufficiency Participant. Scholarship focuses on the following areas: Business Administration, Criminal Justice, Early Childhood Education, Environmental Studies, Histologic Science, Human Services, and Medical Billing and Coding. Scholarships are based on availability.

**The Connecticut Talent Assistance Cooperative, Inc.’s** mission is to facilitate the entry and/or re-entry of eligible Connecticut residents into postsecondary educational programs. Specific program activities include client educational assessments, career and academic counseling and guidance, college tutorial services and collection and dissemination of financial aid information.

These services, which involve no fees to the client, are targeted to Connecticut residents, 19-years of age and older who desire to pursue a program of postsecondary education. CONNTAC-EOC maintains 10 satellite offices which are Capital Community College, Gateway Community College, Housatonic Community College, Manchester Community College, Middlesex Community College, Naugatuck Valley Community College, Norwalk Community College, Quinebaug Valley Community College, Three Rivers Community College and Tunxis Community College.

## **VII. FSS PORTABILITY**

Families selected to participate in the FSS program must initially live in an assisted unit within the DOH/JDA’s jurisdiction for twelve consecutive months in order to exercise a move under portability provisions. In coming portable FSS families will be absorbed if funding is available into the DOH/JDA’s FSS Program if a slot is available based on our preferences on the waiting list of the 15 FSS slots for applicants or participants who are in a related service program.

If a family exercises portability after its initial occupancy, and are at any time during the term of the Contract of Participation unable to fulfill their FSS obligations (either by continuing in the initial DOH/JDA's program or transferring to the Receiving PHA's program), FSS participation and Section 8 assistance may be terminated. If the FSS Contract of Participation is terminated prior to successful completion by the family of all goals, any accrued escrow amount would be forfeited, per the contract's requirements. The family would be offered the opportunity for an informal hearing in the event of either FSS participation termination or Section 8 termination.

## **VIII. PROGRAM TERMINATION**

### **Involuntary Termination:**

Participants may be denied or involuntarily terminated from FSS under the following circumstances:

- A. If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan, the Program Completion Agreement and related documentation. Non-compliance includes:
  - a. Missing scheduled meetings, failure to return phone calls, and maintain contact after written notification of non-compliance.
  - b. Failure to complete quarterly reviews
  - c. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan
  - d. Failure to complete activities and/or goals within the specified time frames;and/or
- A. Failure to participate in job related activities (i.e. employment, education, training, workshops, completing applications, etc)
- B. If the participant owes money to the DOH/JDA or any other PHA in connection with the Section 8 Program
- C. If the participant breached an agreement to pay back amounts owed to the Housing Authority for payments made on behalf of the family to an owner in the Section 8 program
- D. If the participant has committed fraud in connection with any Federal housing assistance program

- E. If the participant failed to meet any obligations under the lease
- F. Expiration of the Contract term or any extension of the Contract without completing the criteria for program completion as outlined under the section Contract Completion
- G. If the client's housing assistance (Section 8) is terminated

Participants who fail to meet their obligations under the above circumstances will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned DOH/JDA representative to resolve the problem. At this meeting, a review of the Contract of Participation, Individual Training and Services Plan, Program Completion Agreement, 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 for 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. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program. Notification to the family will be made 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 Hearing 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.

**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.

If the family withdraws from the FSS program with the mutual consent of DOH/JDA and the FSS Head of Household, then the family may rejoin the FSS program in the future, with the following understanding:

- ❖ The family signs a new Contract of Participation, Program Completion Agreement, and Individual Training and Services Plan.
- ❖ The family is not eligible to receive funds accrued in escrow up to the point of their initial withdrawal from FSS.
- ❖ The family will be eligible to receive future deposits into escrow upon rejoining the FSS program.

### **Hearing Procedures:**

All requests for informal hearings must be received by DOH/JDA FSS Coordinator within fourteen (14) business days of the date of the FSS termination letter. If a hearing is requested by the FSS family, notification to the family regarding the date, time, and location of the informal hearing will be made by mail.

Persons included in the informal hearing shall include, but not be limited to:

- The FSS head of household;
- The FSS Coordinator; and
- DOH/JDA staff members, other than FSS program staff, serving as the Hearing Officer, all participants have the right to obtain legal representation and provide their witnesses.

The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

Requests to reschedule a hearing must be made in writing within (5) days prior to the hearing date. At their discretion, DOH/JDA may request documentation of the “good cause” prior to rescheduling the hearing. If the family does not appear at the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the emergency, the family must contact DOH/JDA within 24 hours of the scheduled hearing date, excluding weekends and holidays. DOH/JDA will reschedule the hearing. The Hearing Officer will issue a written decision to the

family within ten (10) business days after the hearing. The decision made by the Hearing Officer will be final. DOH/JDA reserves the right to overturn the Hearing Officer's decision only in the event that the decision is contrary to the policy.

### **Reasonable Accommodations**

DOH/JDA and FSS program staff will make reasonable accommodations to persons with disabilities in order to ensure they are able to take full advantage of the services provided under the FSS program.

## **IX. RIGHTS OF NON-PARTICIPATING FAMILIES**

Participation on the Family Self – Sufficiency Program is voluntary. DOH/JDA will not penalize a Section 8 Voucher holder who chooses not to participate.

### **Time Table for Program Implementation**

Program implementation has already occurred and outreach selection, and enrollment activities are ongoing. Family Self-Sufficiency slots are in the process of being filled and will continue to be filled as vacancies occur and as additional slots are created. The services identified in this Action Plan are in place and are being accessed by Family Self- Sufficiency program participants. The Family Self- Sufficiency program has been revised according to HUD requirements and information contained in this Action Plan.

## **X. PROGRAM COORDINATING COMMITTEE (PCC)**

A program coordinating committee has been established in accordance with FSS regulations and to assists in securing commitments of public and private resources for the operation of the FSS Program. The committee will work to develop program policies and procedures and oversee program implementation. The PCC meets Semi-annually and may conduct business on an as-needed basis via email or telephone conferences. PCC includes representatives from a variety of agencies and individuals, which includes but is not limited to the following individuals:

[Editor's Note: the names and affiliations of the individuals have been omitted before posting this sample plan.]

DOH/JDA FSS program reserves the right to make addendums to this Action Plan as situations, regulations, and funding sources change, but such changes will be made in compliance with HUD's regulations.

## **XI. CERTIFICATION OF COORDINATION**

As required by 24 CFR 984.201(d)(12), DOH/JDA certifies that development of the services and activities under this FSS program has been coordinated with the following programs specified in the regulation (or their successors): the JOBS Program; the programs provided under the JTPA; and any other relevant employment, child care, transportation, training, and education programs (e.g., Job Training for the Homeless Demonstration program) in the applicable area, and that implementation will continue to be coordinated, in order to avoid duplication of services and activities.