



## **Section 8 Program**

Family Self-Sufficiency

Action Plan

Terrebonne Parish Consolidated Government

Department of Housing and Human Services

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## **I. Introduction**

### **Introduction**

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by *Terrebonne Parish Consolidated Government (TPCG)*. It was submitted to HUD on September 23, 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 *Terrebonne Parish Consolidated Government's* local policies 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 *Terrebonne Parish Consolidated Government's* personnel policy and Agency Plan.

## **II. Program Objectives**

### **Program Objectives**

*Terrebonne Parish Consolidated Government'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**

#### **Family Demographics**

These tables describe the demographics of the population expected to be served by TPCG's Action Plan.

The FSS program will serve the following housing assistance programs:

- Public Housing,
- Housing Choice Vouchers (HCV): Tenant-Based Vouchers
- Housing Choice Vouchers (HCV): Project-Based Vouchers (PBV)
- Housing Choice Vouchers (HCV): HCV Homeownership

- Housing Choice Vouchers (HCV): Other special purpose vouchers (e.g. FUP, FUP-Y, FYI, VASH, EHV, etc.) (Specify: \_\_\_\_\_)
- Section 8 Moderate Rehabilitation
- Project-Based Rental Assistance (PBRA)
- Other Program (Specify: \_\_\_\_\_)

**Ages of Head of Household and Other Adults**

	<b>Percent</b>
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	19%
--Head of Household is age 62 or greater	28%
Ages of Other Adults in Household	
-- Age 24 years or younger	8%
-- Age 25 to 50	6%
-- Age 51 to 61	1%
-- Age 62 or greater	2%

**Presence and Ages of Children**

	<b>Percent</b>
Presence and Ages of Children	
--Households that only include adults over age 18	49%
--Households that include one or more child age 13-17	5%
--Households that include children who are all 12 or younger	23%

**Employment Status of Population to be Served**

	<b>Percent</b>
Employment Status of Head of Household	
--Families with an employed head	17%
--Families whose head is unemployed	83%
Employment Status of All family members	
--Families with any member that is employed	26%
--Families with no employed member	74%

**Annual Earned Income of Population to be Served**

	<b>Percent</b>
Annual household earnings <\$5,000 per year	5%
Annual household earnings between \$5,000 and \$9,999	14%
Annual household earnings between \$10,000 and \$14,999	13%
Annual household earnings between \$15,000 and \$19,999	26%
Annual household earnings between \$20,000 and \$24,999	30%
Annual household earnings between \$25,000 and \$29,999	8%
Annual household earnings between \$30,000 and \$34,999	3%
Annual household earnings of \$35,000 or higher	1%

**Elderly/Disability Status of Population to be Served**

	<b>Percent</b>
Elderly/Disability Status of Head of Household	
--Head of Household is an elderly person without disabilities	5%
--Head of Household is an elderly person with disabilities	23%
--Head of Household is a non-elderly person without disabilities	25%
--Head of Household is neither an elderly person nor a person with disabilities	47%
Elderly/Disability Status of All Household members	
--Household includes an elderly person without disabilities	5%
--Household includes an elderly person with disabilities	24%
--Household includes a non-elderly person with disabilities	37%
--Household includes no elderly persons or persons with disabilities	34%

**Race and Ethnicity of Population to be Served (required)**

<b>Race</b>		Non-Hispanic	Hispanic
White	10%	99%	1%
Black or African-American	84%	100%	0%
American Indian or Alaska Native	2%	100%	0%
Asian	1%		
Native Hawaiian or other Pacific Islander	1%	100%	0%
Other Race	2%	100%	0%

### III.B – Supportive Services 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 *Terrebonne Parish Consolidated Government'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 child care
- 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 *[date]*
- Other: \_\_\_\_\_

### III. C. – Estimate of Participating Families

#### **Estimate of Participating Families**

Over time, *Terrebonne Parish Consolidated Government* 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 *TPCG FSS Program* has been funded for **ONE full-time** coordinator. The minimum number of participants required to be served based on this funding is **25**.

Historically, *TPCG'S FSS program* has enrolled **an average of 9** new families into the FSS program each year. Accordingly, *Terrebonne Parish Consolidated Government* expects to be able to provide FSS Services to **202** families over a five-year period.

### III. D – Other Self-Sufficiency Programs

#### Other Self-Sufficiency programs

No families from other self-sufficiency programs are expected to enroll in the FSS program.

## IV. Family Selection Procedures

### 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 and the date of their application.

#### B. Admissions Preferences

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

<u>Selection Method</u>	<u>Check applicable method</u>
Lottery	<input type="checkbox"/>
Length of time living in subsidized housing	<input type="checkbox"/>
Date the family expressed an interest in participating in the FSS program	<input checked="" type="checkbox"/>
Other: <i>Families Porting In</i>	<input checked="" type="checkbox"/>

#### C. Screening for motivation.

The *Terrebonne Parish Consolidated Government* will not use any motivational screening factors to measure a family's interest and motivation to participate in the FSS program.

#### D. Compliance with nondiscrimination policies

It is the policy of *Terrebonne Parish Consolidated Government* 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, *TPCG'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, **TPCG** will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

#### **E. Re-enrollment of prior FSS participants**

The following previous FSS families will be allowed to re-enroll in **Terrebonne Parish Consolidated Government** FSS program:

- FSS program graduates. Only allowed if family received less than \$5,000.00 in escrow disbursement.
- FSS participants who have withdrawn voluntarily [*No less than one year after withdrawal*]
- Families terminated with escrow disbursement [*No less than one year after termination*]
- Families involuntarily terminated [*No less than one year after termination*]
- Family members who were not Heads of FSS Family previously
- No member of previously enrolled families may re-enroll

The following conditions apply to re-enrollment:

*Families requesting to re-enroll must show a desire to actively participate by establishing reachable goals to be completed within the allotted timeframe agreed upon between the FSS Coordinator and the FSS participant. A family will only be allowed to re-enroll once. In the case of families being voluntarily or involuntarily withdrawn from FSS, enrollment will only be considered if there is a major change in household circumstances (ie. Change in employment or student status).*

#### **F. Head of FSS Family**

The head of the FSS family is designated by the participating family. The **TPCG FSS** Coordinator 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 **Terrebonne Parish Consolidated Government** in:

- Writing
- A form developed by the **Terrebonne Parish Consolidated Government**
- Other [*specify*]

## **V. Outreach**

### **Outreach**

**Terrebonne Parish Consolidated Government** 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
<input checked="" type="checkbox"/> Posting information about FSS on the <i>TPCG's</i> website	FSS information will continually be listed on website, along with approved Action Plan link.
<input type="checkbox"/> Posting FSS program flyers in locations likely to be seen by eligible families	
<input checked="" type="checkbox"/> Providing information about the FSS program during scheduled reexaminations	FSS survey and pamphlet included in every reexamination application packet.
<input checked="" type="checkbox"/> Providing information about the FSS program at voucher orientation sessions	FSS survey and pamphlet included in every voucher orientation packet.
<input type="checkbox"/> Holding well-publicized information sessions about FSS	
<input checked="" type="checkbox"/> Providing information about the FSS program to eligible families by mail	Annual Postcard Campaign
<input checked="" type="checkbox"/> Facebook	Weekly informational posts
<input checked="" type="checkbox"/> Twitter	Weekly informational posts
<input checked="" type="checkbox"/> Instagram	Weekly informational posts
<input checked="" type="checkbox"/> Other [ <i>Lobby Television</i> ]	FSS Videos and information on constant rotation.

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, *TPCG* 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 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 TPCG, are described below.

#### **A. Additional Incentives**

While the *Terrebonne Parish Consolidated Government'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 TPCG FSS Program 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 must 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. A determination of whether the family qualifies for the requested interim disbursement will be made on a case-by-case basis by the FSS Coordinator and an administrative staff representative of the TPCG Section 8 Program. The FSS coordinator will first explore options for services and in-kind donations from partners, which must be exhausted before a request for an interim disbursement will be approved.

#### **C. Uses of forfeited escrow funds.**

**Treatment of forfeited FSS escrow account funds.** *TPCG FSS Program* will use forfeited escrow accounts for support and other costs for FSS participants in good standing when funds requested are needed to complete an interim goal or task in the ITSP and are not ongoing expenses or if the family can demonstrate that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals in the ITSP.

Upon written request from a family, the FSS Coordinator and an administrative staff representative of the *TPCG Section 8 Program* will consider the available funds and make a determination. *TPCG* will prioritize requests for funds from forfeited escrow accounts initially on a first come first served basis based on the date and time of the request.

*TPCG* will use forfeited escrow accounts for training provided to FSS Coordinator.

*Terrebonne Parish Consolidated Government* 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
- Within [####] days of CoP execution
- No more than [####] days prior to the scheduled expiration of CoP

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

- Terrebonne Parish Consolidated Government**
- Head of the FSS family
- Non-head FSS family members

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

Eligible Uses	Guidelines / Limitations
<input checked="" type="checkbox"/> Purchasing a vehicle	<input type="checkbox"/> Families interested in using a forfeited escrow funds to purchase a vehicle must first receive a referral to <b><i>[add partner name]</i></b> that provides discounted vehicles. <input checked="" type="checkbox"/> The maximum forfeited escrow fund amount that will be allowed for a vehicle purchase is: \$5000.00 <input checked="" type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach. <input checked="" type="checkbox"/> The terms of any vehicle purchase or vehicle loan will be carefully scrutinized to ensure the terms are reasonable. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Child Care	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Training for participants	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Employment or Educational Costs, including: <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Employment training</li> <li><input checked="" type="checkbox"/> Employment preparation (e.g.,</li> </ul>	<input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach

interview training, professional clothing, etc.) <input checked="" type="checkbox"/> Education costs (books, fees, uniforms, tools, etc.)	<input type="checkbox"/> Household member receiving funding support must be engaged in financial coaching and this request must have the support of their financial coach <input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Training for FSS Program staff	<input checked="" type="checkbox"/> Requests for funding must be approached by <b><i>TPCG Section 8 Administration.</i></b> <input type="checkbox"/> Other: <i>[specify]</i>
<input type="checkbox"/> Other:	<input type="checkbox"/>

## VII. Family Activities and Supportive Services

### 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
<input checked="" type="checkbox"/> <b>Assessment</b>	<input checked="" type="checkbox"/> Vocational Assessment Educational <input checked="" type="checkbox"/> Assessment Disability Assessment <input checked="" type="checkbox"/> Disability Other specialized assessments	Gulf Coast Teaching & Family Services Options for Independence LA Rehabilitation Services START Corporation
<input checked="" type="checkbox"/> <b>Child Care</b>	<input checked="" type="checkbox"/> Infant Care / Toddler Care Preschool Care <input checked="" type="checkbox"/> Afterschool Care <input checked="" type="checkbox"/> Homework Assistance	TPCG Head Start TPCG Library Public/Private Daycare
<input checked="" type="checkbox"/> <b>Transportation</b>	<input checked="" type="checkbox"/> Bus passes <input type="checkbox"/> Assistance with car repairs <input type="checkbox"/> Assistance with car purchase	TPCG Transit Services
<input checked="" type="checkbox"/> <b>Education</b>	<input checked="" type="checkbox"/> High School Equivalency/GED <input checked="" type="checkbox"/> English as a Second Language <input checked="" type="checkbox"/> Post-secondary certificates <input checked="" type="checkbox"/> Advanced Degrees	Bayou Cane Adult Education Fletcher Technical Community College
<input checked="" type="checkbox"/> <b>Skills Training</b>	<input type="checkbox"/> Training in Executive Function <input checked="" type="checkbox"/> Basic Skills Training <input type="checkbox"/> Emerging Technologies Training <input checked="" type="checkbox"/> Biomedical Training (including CNA, phlebotomy, x-ray and other tech, etc.)	Learning Bridge Blue Cliff College Unitech Training LA Workforce Commission START Youthbuild

	<input checked="" type="checkbox"/> On-the-Job Training <input type="checkbox"/> Apprenticeships <input type="checkbox"/> Skilled Labor training	Salvation Army
<input checked="" type="checkbox"/> <b>Job Search Assistance</b>	<input checked="" type="checkbox"/> Resume Preparation <input checked="" type="checkbox"/> Interviewing Skills <input checked="" type="checkbox"/> Dress for Success <input checked="" type="checkbox"/> Workplace Skills <input checked="" type="checkbox"/> Job Development <input checked="" type="checkbox"/> Job Placement	LA Workforce Commission Goodwill of South LA Lofton Staffing Associated Staffing Salvation Army
<input checked="" type="checkbox"/> <b>Micro and Small Business Development</b>	<input checked="" type="checkbox"/> Small business development services <input type="checkbox"/> Small business Mentoring <input type="checkbox"/> Entrepreneurship Training	TEDA Legacy Business Center
<input checked="" type="checkbox"/> <b>Health/Mental Health Care</b>	<input checked="" type="checkbox"/> Alcohol and Drug Abuse Prevention <input checked="" type="checkbox"/> Alcohol and Drug Abuse Treatment <input checked="" type="checkbox"/> Primary care <input checked="" type="checkbox"/> Dental services <input checked="" type="checkbox"/> Mental Health Services <input type="checkbox"/> Health Insurance Advising	Terrebonne Mental Health New Start Recovery Ascent Health START Community Health Center TECHE Action Clinic Terrebonne Parish Health Unit
<input checked="" type="checkbox"/> <b>Crisis Services</b>	<input checked="" type="checkbox"/> Crisis Assessment <input checked="" type="checkbox"/> Crisis Intervention <input checked="" type="checkbox"/> Crisis Management <input checked="" type="checkbox"/> Crisis Resolution	Beacon Behavioral South Central LA Human Services Authority Terrebonne Parish Emergency Crisis Center Magnolia Family Services Ascent Health Salvation Army United Way
<input checked="" type="checkbox"/> <b>Child/Adult Protective Services</b>	<input checked="" type="checkbox"/> Needs Assessment <input type="checkbox"/> Case Planning <input checked="" type="checkbox"/> Information Referral	The Haven Battered Women’s Shelter DCFS Elderly Protection DCFS Child Protection CASA
<input checked="" type="checkbox"/> <b>Household Management</b>	<input checked="" type="checkbox"/> Training in Household Management	Catholic Charities of Houma
<input checked="" type="checkbox"/> <b>Homeownership Preparation</b>	<input checked="" type="checkbox"/> Homeownership Education <input checked="" type="checkbox"/> Housing Counseling <input checked="" type="checkbox"/> Down Payment Assistance <input type="checkbox"/> Other Homeownership Assistance	Catholic Charities of Houma Iberia Bank

<input checked="" type="checkbox"/> <b>Financial Empowerment</b>	<input checked="" type="checkbox"/> Financial education <input checked="" type="checkbox"/> Financial coaching <input checked="" type="checkbox"/> Banking services <input checked="" type="checkbox"/> Training in money management	Catholic Charities of Houma Iberia Bank START Corporation Options for Independence
<input checked="" type="checkbox"/> <b>Individual Development Accounts</b>	<input checked="" type="checkbox"/> Matched Savings Accounts	United Way
<input checked="" type="checkbox"/> <b>Legal Services</b>	<input checked="" type="checkbox"/> Legal Services	Southeast LA Legal Services Goodwill of South LA
<input checked="" type="checkbox"/> <b>Debt Resolution &amp; Credit Repair</b>	<input checked="" type="checkbox"/> Assistance negotiating the resolution of past-due debt	Iberia Bank Allegiance Home Lending American South Mortgage Lending
<input type="checkbox"/> Other:		

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

### **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, *TPCG FSS Program* 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**

### **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 *TPCG FSS Program*'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 *TPCG FSS Program*, 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 *TPCG FSS Program* 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 *TPCG FSS Program* 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 *TPCG FSS Program*, 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. *TPCG FSS Program* 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 *TPCG FSS Program*, 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 *TPCG FSS Program* or



(iii) Any other circumstances that the **TPCG FSS Program** determines warrants an extension, including extenuating circumstances (ie. Global pandemic, natural disaster).

#### **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 **TPCG FSS Program** will accept the following form of verification for completion of the ITSP goals:

The TPCG will require a combination of self-certification and third-party verification to document completion of ITSP goals.

#### **F. Modification**

The **TPCG FSS Program** 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 **TPCG FSS Program** as well as the Head of FSS Family.

The **TPCG FSS Program** 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 **TPCG FSS Program**, 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**
- Other:

The **TPCG FSS Program** 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 Procedures

### Program Termination

#### A. Involuntary Termination

The ***TPCG FSS Program*** 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 two 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 ***Terrebonne Parish Consolidated Government*** 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 this a meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue(s), may lead to termination from the program. The FSS Coordinator will also attempt to contact the participant via phone, text, in person and/or email prior to the review meeting. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program.

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

1. The specific facts and reasons for termination;
2. A statement informing the family of their right to request an informal hearing and the date by which this request must be received (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 *TPCG FSS Program* 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 *TPCG FSS Program* and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- (iii) An 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**

All requests for an informal hearing must be received by *TPCG Family Self-Sufficiency* 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
- *Terrebonne Parish Consolidated Government* 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 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.

*Terrebonne Parish Consolidated Government's* PHA Plan details the *TPCG's* Grievance Procedures (See page 16-6 through 16-9).

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 the *TPCG FSS Program* within 24 hours of the scheduled hearing date, excluding weekends and holidays. *TPCG FSS Program* will then 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. The *TPCG FSS*

*Program* reserves the right to overturn the Hearing Officer’s decision only in the event that the decision is contrary to the organization’s written policies.

## **XI. Assurance of Non-Interference**

### **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 *Terrebonne Parish Consolidated Government’s* decision of whether to admit the family into the *Housing Choice Voucher* 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.

*Terrebonne Parish Consolidated Government* will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.

## **XII. Timetable**

### **Timetable**

*TPCG* implemented its FSS program in 1995 and will continue to implement it per this FSS Action Plan.

#### Program Begins

The FSS program will commence operation as soon as the TPCG has received notification of HUD’s approval of the Action Plan.

#### Program Coordinating Committee

Within 90 days after the program begins, a Program Coordinating Committee (PCC) will be formed and will begin meeting. The Committee will continue to meet monthly for the next twelve months. Thereafter, meetings will be quarterly. Additional special meetings will occur as needed.

#### Outreach

Within 90 days of program launch, outreach efforts will commence, as described above in the Outreach section.

#### Participant Selection

Candidates who respond to the outreach efforts will be selected in accordance with the selection procedures described above. The first FSS program participants are expected to be enrolled within 120 days of program launch.

#### Contract Execution

Contracts of Participation will be executed with selected participants on a rolling basis. The first Contracts of Participation are expected to be completed within 6 months of program launch.

#### Full Enrollment

The FSS program expects to reach full capacity within 12 months of program launch. (See discussion above of the number of participants expected to be served. Note that generally for funded programs, the program is required to be serving the minimum number of participants within one year.)

#### Program Maintenance

The FSS program expects to operate at full capacity thereafter, subject to normal fluctuations related to families leaving and entering the program.

### **XIII. Reasonable Accommodations, Effective Communications, and Limited English Proficiency**

#### **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 [www.tpcg.org](http://www.tpcg.org).

##### **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 [www.tpcg.org](http://www.tpcg.org).

##### **Limited English Proficiency**

The *TPCG FSS Program* 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 [www.tpcg.org](http://www.tpcg.org).

## **XIV. Coordination of Services**

### **XIV.A Coordination of Services (PHAs only)**

#### **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, child care, transportation, training, education, and financial empowerment programs in the area. Implementation will continue to be coordinated, in order to avoid duplication of services and activities.

##### **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. When available, representatives from a variety of agencies and individuals, which include but are not limited to the following:

**Catholic Charities of Houma**  
**Ascent Health**  
**LA Workforce Commission**  
**TPCG Head Start**  
**Blue Cliff College**  
**START Corporation**

## XV. FSS Portability (Applicable to HCV Only)

### Portability

#### A. Portability in initial 12 months

While *TPCG Family Self-Sufficiency Program* is not required to allow FSS participants to exercise portability within the initial 12 months after signing a CoP, it is the policy of *TPCG FSS Program* to allow for portability within this period to the extent feasible.

#### 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 *TPCG's* FSS program unless the *TPCG FSS Program* is already serving the number of FSS families identified in this FSS Action Plan and determines that it does not have the resources to manage the FSS contract.

Regardless of whether *TPCG FSS Program* is able to receive an incoming family from another jurisdiction into the FSS program, *TPCG FSS Program* will agree to allow and support porting families to remain in their initial PHA's FSS program after porting housing vouchers if the initial PHA requests that the family remain in the initial FSS program and can demonstrate the family is able to fulfill its responsibilities under the initial CoP, the move in jurisdictions notwithstanding.

#### C. FSS termination with disbursement for porting families

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, the *TPCG FSS Program* 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, *TPCG FSS Program* 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

### 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. Definitions

### 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 **TPCG FSS Program**, as may be required under this part, and which:

- (1) Shall be maintained by the **TPCG FSS Program** 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 **TPCG FSS Program**, and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or the **TPCG FSS Program** 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 Terrebonne Parish Consolidated Government 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 **TPCG FSS Program** 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 **TPCG FSS Program**.

*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 **TPCG FSS Program** 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 **TPCG FSS Program**; 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.

*Individual Training and Services Plan (ITSP)* means a written plan that is prepared by the **TPCG FSS Program** 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 **TPCG FSS Program** 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 **TPCG FSS Program** Staff member 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.