



ACTION PLAN FOR THE FAMILY SELF-SUFFICIENCY PROGRAM

CITY OF TUCSON HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT

ADDENDUM TO
HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE PLAN
FOR
CITY OF TUCSON AND PIMA COUNTY

PHA ACTIONS TO AFFIRMATIVELY FURTHER
FAIR HOUSING FOR PARTICIPANTS
IN THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM
24 CFR 984

JULY 1, 2019

CITY OF TUCSON
HOUSING AND COMMUNITY DEVELOPMENT DEPARTMENT
FAMILY SELF SUFFICIENCY PROGRAM ACTION PLAN
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I. STATEMENT OF OVERALL APPROACH

The City of Tucson(COT), Housing & Community Development Department (HCDD), to further its goal to develop and effectively promote families and individuals to move toward independent living and economic independence, COT HCDD has established a plan for the Family Self Sufficiency (FSS) program. The program is designed to assist low-income families to achieve self-sufficiency by integrating low rent Housing Assistance with employment, training programs, and supportive services. Our administrative approach is to coordinate and collaborate with various agencies and entities in the community to provide the needed services to FSS participants and their families.

II. FAMILY DEMOGRAPHICS [24 CFR 984.201(d)(1)]

As part of the required contents of the FSS Action Plan, family demographics of the Housing Choice Voucher (HCV) and Public Housing program participants serve to provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants). The data may later be used to help the housing authority and the program coordinating committee (PCC) to identify supportive service needs of the families expected to participate in the FSS program.

Housing Choice Voucher/Public Housing	Total Families	Percent of Total
All Families	7,716	100%
Female HOH	5,289	69%
Male HOH	2,427	31%
Race		
White	5,864	76%
Black/African American	1,267	16%
American Indian/Alaska Native	335	4%
Asian	57	1%
Native Hawaiian/Other Pacific Islander	26	0%
Other	70	1%
Ethnicity		
Hispanic or Latino	3,351	43%
Not Hispanic or Latino	3,107	40%
Other	458	7%
Income		
Extremely Low-Income	5,212	68%
Very Low-Income	1,506	20%
Low-Income	982	12%
Household Income from Wages	2,194	28%

Number of Children		
0 (Section 8 only)	3,321	56%
1-2 (Section 8 only)	1,076	18%
3-4 (Section 8 only)	148	2%
5 or more	8	0%
Total Number of Family Members	13,230	
1-2	4,624	60%
3-4	1,682	22%
5 or more	1,028	13%
Persons with Disabilities		
Household Person w/ Disabilities	3,758	49%

III. PROGRAM PROFILE

Public Housing and Housing Choice Voucher participant families will be of varied racial and ethnic backgrounds. Supportive services will be determined based on family needs and available resources.

IV. PROGRAM COORDINATING COMMITTEE

A Program Coordinating Committee (PCC) has been established to bring together both public and private agency representatives in the community. The role of the PCC is generally to support program marketing efforts, to assist in securing commitments of public and private resources. Additionally, the PCC may be called upon to assist with the development, implementation and administration of program components or policies. The PCC is comprised of HCD staff, Public Housing or Housing Choice Voucher (HCV) participants, representatives from community agencies and private business entities from the community.

V. CERTIFICATION OF COORDINATION [24 CFR 984.201(d)(12)]

The FSS action plan is required to contain a certification that the development of the activities and services under the FSS program has been coordinated with the JOBS program (now Welfare to Work under TANF), the programs provided under the JTPA (now Workforce Investment Act programs), and any other relevant employment, child care, transportation, training, and education programs in the applicable area. The implementation of the FSS program's activities and services must continue to be coordinated as such in order to avoid duplication of activities and services.

PHA Policy

The PHA certifies that its FSS program has developed its services and activities in coordination with the Workforce Investment Act (formerly JTPA), Workforce Investment Board and ARIZONA@WORK One Stop Centers, Welfare to Work (formerly JOBS program), and any other relevant employment, child care, transportation, training, and education programs in the

applicable area. The implementation of these activities and services will continue to be coordinated in this manner in order to avoid duplication of activities and services.

VI. MONITORING

Monitoring of FSS participant progress will be coordinated with COT HCDD staff FSS Project Coordinators, who will recommend appropriate activities in relation to the goals set forth in the FSS contract and make referrals for additional supportive services as necessary.

VII. ASSURANCE OF NONINTERFERENCE WITH THE RIGHTS OF NON-PARTICIPATING FAMILIES [24 CFR 984.201(d)(10)]

A family's housing assistance or admission into assisted housing should never depend on whether they choose to participate in the FSS program, and PHAs need to make this known as part of the recruitment process. For this reason, the PHA's action plan must include an assurance that a family's decision to not participate in the FSS program will not affect the family's admission to the public housing or housing choice voucher programs, nor will it affect the family's right to occupancy in accordance with the lease.

PHA Policy

Participation in the FSS program is strictly voluntary. Public Housing residents and Housing Choice Voucher program participants will be notified in all literature and media presentations related to the FSS program that should they decide not to participate in the FSS program it will not affect their public housing or HCV housing assistance. This material will also specify that the family will retain the right to occupancy according to their lease and family obligations contract.

VIII. OUTREACH AND MARKETING

Outreach efforts to all current Public Housing and Section 8 Housing Assistance participants include, but are not limited to written notices, flyers, newsletters, verbal presentations, and FSS brochures. Efforts are made to inform all Public Housing and Section 8 participants in order to offer an opportunity to participate in the FSS program to all who are eligible, both minority and non-minority groups.

Those responding will be offered an opportunity to submit an FSS application and be added to the FSS waitlist. Separate internal waitlists will be maintained for Public Housing and Section 8 participants. FSS applicants name will be added to the appropriate waitlist in the order applications are received.

IX. OCCUPANCY CRITERIA

Continued occupancy criteria will be applied to all FSS participant families. An FSS participant family must currently reside in the Public Housing program or be a current participant of the Section 8 Housing Assistance program. Upon exit from either of these programs, FSS participation will automatically terminate.

X. SELECTION AND ENROLLMENT PROCESS

Initial Eligibility for FSS Program - Those selected for FSS must also meet all of the eligibility criteria for Public Housing or HCV Assistance, whichever program is appropriate. COT HCDD may refuse FSS participation to families who are not in good standing with the PHA including owing money to this or any other PHA/IHA in connection with Public Housing or HCV assistance.

Good standing is defined for Public Housing clients as follows: Must be in compliance with their lease and current in all payments to the housing authority and must pass a housekeeping inspection.

Wait list Selection Process - FSS enrollment is continuous, however the PHA may create a wait list if there is a high demand to participate in the FSS program. The FSS service provider shall initiate and maintain an FSS waitlist when the program is at capacity. Applicants will be placed on the FSS waitlist in the order in which the application is received (i.e. date of receipt). Individuals on the waitlist will be contacted in the order in which they were added to the waitlist to enroll when program openings become available. This method ensures that families will be selected without regard to race, color, religion, sex, handicap, familial status, or national origin. Individuals will be removed from the waitlist if they enroll in the program, decline the slot, or are non-responsive to two written outreach attempts. PHA will not maintain an exact limit on the number of slots available on the FSS wait list, however PHA may temporarily close the FSS waitlist if it becomes so large that those waiting significantly outnumber anticipated available slots. Families who do not participate in the FSS program may continue in their current housing assistance program.

Selection Preference- Prioritization of enrollment will be extended to current Resident Opportunity for Self Sufficiency (ROSS) program participants who have accomplished their goals listed in their ITSP and want to enroll in the FSS program.

FUP/FSS Demonstration- In July 2016, PHA was approved for implementation of a Family Unification Program (FUP) and FSS Demonstration (FUP/FSS Demonstration) sponsored by HUD to test the effectiveness of combining housing vouchers for eligible youth lacking adequate housing under FUP with assistance from the FSS program. FUP youth participants in the FUP/FSS Demonstration are able to extend the length of their FUP housing voucher (time-limited to 36 months) through the full term of their FSS participation. In order to be eligible for the FUP/FSS Demonstration, the FUP participant must be certified at the time of application by the local public child welfare agency (PCWA) to be at least 18 years old and not more than 24 years old, who left foster care at age 16 or older or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act, and who does not have adequate housing. PHA will determine eligibility for voucher assistance. FUP participants will be held to all other FSS program requirements and policies as described in this Action Plan.

In order to ensure prioritization of enrollment for FUP youth, PHA will utilize a selection preference for FUP youth applicants who elect to participate in the demonstration. FUP youth

applicants will be moved to the top of the FSS waitlist in the order in which the referral or inquiry is received.

Once FUP youth have utilized the housing voucher to lease a unit, PHA staff and/or the FSS service provider will conduct outreach to the household to provide information on the FSS program and FUP/FSS Demonstration, including:

- The enrollment process;
- A description of available services to be provided during participation;
- The term of the program;
- Requirements for participation and graduation; and
- Contact information for FSS staff should they have any questions about the program.

FUP youth may also receive information on the FSS program and other programs and resources offered to PHA households at their admissions/initial voucher briefing.

FSS service provider or PHA staff will periodically follow up with FUP youth who do not enroll in the FUP/FSS Demonstration (i.e. quarterly or bi-annually) to provide additional marketing materials about the FSS program, and to address any questions about the program. Additional FSS workshops or information sessions specifically targeted to FUP youth may also be scheduled to inform participants of the demonstration program and services available.

FUP/FSS Demonstration – Contract Completion and Termination

Participants of the FUP/FSS Demonstration, who are able to extend the length of their housing voucher through the full term of their FSS participation, will no longer receive housing assistance upon completion of the COP, regardless of whether the COP is terminated due to non-compliance or successful completion of the program. If a participant in the FUP/FSS Demonstration is terminated from the FSS program prior to completion of the COP, the participant will no longer be considered a part of the FUP/FSS Demonstration. With the FSS termination, the participant is subject to the statutory time limit of 36 months, beginning from the time the first HAP contract is signed. If the participant has been assisted for more than 36 months, their housing assistance will be terminated. In accordance with PHA's HCV Administrative Plan, the participant will be eligible for an informal hearing to appeal the termination

XI. FAMILY NEEDS ASSESSMENTS AND SUPPORTIVE SERVICES

Identifying Family Needs -Prior to entering the FSS program, the family will be required to attend an intake session with a case manager in order to determine program goals, service needs and preliminary tasks for motivational screening, if necessary. Preliminary tasks may be assigned to the family in order to determine the family's willingness to undertake the obligations in the FSS contract. These tasks must be readily accomplishable by the family, based on the family members' educational level and disabilities, if any. Some examples of preliminary tasks may be to require the applicant family to:

- Contact ARIZONA@WORK One-Stop program to sign up for assessment testing
- Complete an intake questionnaire and bring it to the initial intake appointment
- Meet with an educational counselor and submit an educational plan to the case manager.

Participant Engagement -Regular outreach and engagement activities (e.g. home visits, office visits, telephone, or email check-ins) are scheduled with participants to review and/or make adjustments to the ITSP, document progress toward goals, and provided needed services or referrals; frequent engagement may be necessary depending on the needs of the participant and the progress made toward FSS goals. FSS Coordinators will attempt to engage with each participant at least once each quarter of the calendar year. Attempts made by FSS Coordinator to contact participant will be documented, a reasonable deadline (10 calendar days) will be given to participant to respond. If participant does not respond within given deadline, a second and final attempt will be made; failure to respond to second and final attempt may result in termination from the FSS program.

FSS Activities and Supportive Services- The FSS Project Coordinator will conduct an assessment of participant needs. Services provided will relate to specific needs in achieving goals set for the participant in the FSS contract. Services may include, but are not limited to the following:

Child Care: Participants will be encouraged to apply for daycare assistance through Department of Economic Security. Other resources in the community may also be available and will be recommended as needed.

Transportation: Bus passes may be available to participants who are in school, job searching or employed. Other community resources will be utilized as available.

Personal and Career Counseling: Counseling on various levels and topics may be provided through referrals to community and private agencies such as, Pima County ARIZONA@WORK One-Stop, CODAC Behavioral Health Services, Prima Vera, COPE Behavioral Health, Tucson Metropolitan Ministries.

Job Development and Placement: FSS Coordinators assist participants with career planning, employment preparation soft-skills, placement, and retention support. FSS participants are referred to external partners and services within the community including Job development, placement, job readiness training programs, and other community-based workforce services.

Training/Education: FSS Coordinators make referrals to adult literacy and GED preparation courses if participants did not complete their high school diploma or GED, and/or need additional literacy courses prior to entering or advancing in the workforce. Participants who have completed their high school diploma or GED are encouraged to enroll in college or other post-secondary education and job training opportunities coordinated with Pima County Adult Education, Pima Community College, Pima County ARIZONA@WORK One-Stop program, Family Housing Resources, Pio Decimo Center and other community and private providers.

Homeownership: FSS Coordinators will encourage families to participate in PHA's HCV

Homeownership program and/or other homebuyer program resources.

Other Activities and Services: The need for other services and activities will be determined on a case by case basis and community and private resources will be utilized.

XII. CONTRACT OF PARTICIPATION (HUD form -52650)

Establishment of a Contract of Participation -The COP is effective the first day of the month after execution. The completion date of the COP is five years from the effective date, during which the participant will engage in activities to meet FSS goals and potentially earn escrow savings credit. If the participant needs additional time to complete the FSS goals, they may be approved by PHA for a contract extension of no more than two years. The head of household of the FSS family must agree to seek and retain suitable employment during the term of the contract and remain welfare free for at least the last 12 months. The contract also sets forth other responsibilities of the family under the Program, to include specific interim goals and final goals. Participants who have not completed their High School Diploma or High School Equivalency Certificate (HSE) are highly encouraged to add this achievement as a final goal to the Contract of Participation.

Annual Income, Earned Income and Total Tenant Payment-The household's Gross Annual Income, Annual Earned Income, and Total Tenant Payment (TTP) will be listed in the COP. These amounts will remain the same throughout the contract term (except in the case of correction due to error). These amounts will be derived from the latest annual or interim recertification (HUD form 50058), with an effective date no more than 120 days prior to the contract commencement date. (If the effective date of the current 50058 is more than 120 days prior, an annual or interim recertification must be conducted for this purpose prior to commencement of the FSS contract.)

Individual Training and Services Plan (ITSP) Development- In conjunction with the COP, the participant completes an ITSP that establishes the final and interim goals for participation in the program. These goals enable PHA, the FSS Coordinator, and the participant to measure the participant's progress. The ITSP is a component of the COP and thus an obligation of the head of household participant; additional family members may also elect to develop an ITSP. The ITSP may be modified by the participant and the FSS Coordinator to reflect changes in personal interests and achievable goals. PHA requires that all participants set interim goals for employment and financial education activities as detailed below, however most interim goals will vary by participant depending on their individual needs.

ITSP Required Goal – Free of Welfare Assistance- In order to successfully complete the program all household members must be independent from welfare assistance (Cash Assistance) during that last 12-months of the COP. The FSS provider shall inform each participant of this requirement regardless of whether anyone in the household is receiving welfare assistance at the time of COP implementation, and include this as a mandatory goal in the ITSP.

PHA requires a signed verification in a format approved by PHA from the participant and utilizes its system of record to determine if the participant's household meets this requirement.

ITSP Required Goal - Employment Requirement- A determination of "suitable" employment will be based on skills, education, and job training of the individual that has been designated the head of the FSS family and based on the available job opportunities with the jurisdiction served by the PHA.

Forms of Employment verification are described below:

- Employment with an established, legitimate business (the participant is receiving a regular paycheck from which taxes and other required deductions are withheld). – or - Self-employment which is verifiable through signed federal income tax returns (with Schedule C) and or in accordance with HUD published existing acceptable forms of verification (found in the HUD Occupancy Handbook Appendix 3).
- Contracted or commission employment will be considered if it meets the suitable employment definition of this action plan, 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.
- Suitable employment may be in a variety of fields, including but not limited to: office, technical, mechanical, medical, daycare, retail, professional, teaching, labor, sales, restaurant, customer service or governmental.

FSS participants are required to maintain continuous employment during the last 60 days of the COP in order to be considered for successful completion and graduation from the program. PHA requires one or more of the following forms of verification to determine if the participant meets this requirement:

PHA employment verification form

- employer offer letter (that includes hire date) and current paystub
- employer letter verifying current employment and hire date
- paystub that includes hire date
- self-employment tax forms

Participants who experience a lapse in employment history due to unexpected termination may still be considered to meet the employment requirement on a case-by-case basis; however the participant must document intent to return to work and/or exhibit a pattern of seasonal work that shows employment will be regained within 60-days of the initial termination, or separation from employment.

Employment Requirement Reasonable Accommodations for disabled individuals - must be requested in writing and supported by a written statement from the individual's medical provider at least 30 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.

COP Completion - The Contract of Participation is considered to be completed and a family's participation in the FSS program is considered to be concluded when one of the following occurs;

- The FSS family has fulfilled all of its obligations under the Contract of Participation on or before the expiration of the contract term, including any extension thereof.

Verification of completion occurs when the family provides one of the following:

- certificate of completion;
 - sign-in sheet;
 - coaching session verification form; or
 - Financial assessment or worksheet.
- Residents who are assisted under the Section 8 program, Contract of Participation concludes when 30 percent of the monthly adjusted income of the FSS family equals or exceeds the published existing housing fair market rent for the size of the unit for which the FSS family qualifies based on the PHA's occupancy standards.

Head of Household Succession – FSS account funds should be disbursed to the head of the FSS family, however if the head of the FSS family no longer resides with the other family members in the Public Housing or HCV assisted units, FSS family members with ITSP may designate contract after consultation and determination of PHA.

COP Extension- FSS participants may be granted COP extension(s) of up to two (2) years if additional time is needed to meet one or more ITSP goals (e.g. needing additional time to remain free of welfare assistance, unable to meet employment requirement due to involuntary loss of employment). The participant must request a COP extension in writing and include a description of the need for the extension and identification of the goal that needs to be met to complete the program. These requests will be evaluated by PHA and/or the FSS service provider and approved on a case-by-case basis.

COP Termination- The COP is automatically terminated if:

- the household's housing subsidy assistance is terminated due to non-compliance;

The COP may be terminated before the expiration of the contract term due to the following:

- The participant and PHA agree to terminate the contract; HA determines that the participant has not fulfilled its responsibilities under this contract, including not achieving or providing documentation to support achievement of the goals outlined in the ITSP;
- The participant voluntarily withdraws from the FSS program;
- An act occurs that is inconsistent with the purpose of the FSS program;
- The household ports-out to another PHA that does not administer an FSS Program;
- Other actions permitted in accordance with HUD requirements.

If the COP is terminated or incomplete the participant will forfeit escrow savings credits earned during participation. Termination of the COP will not affect eligibility for housing subsidy; FSS households exiting the program due to unsuccessful exit will retain the right to occupancy according to their lease, and the ACOP or HCV Administrative Plan.

FSS Families that leave the FSS program without graduating may be allowed to re-enroll in the FSS program depending on several program factors, including the total number of residents interested in the FSS Program, whether there is a waiting list to participate in the FSS program, and the caseload and capacity of FSS program coordinator staff. Approval will be on a case by case basis based on additional factors, such as the reason the family exited the FSS program, and reasons for wanting to re-enroll, the length of time the resident has been out of the FSS program and what has changed to make the participant now ready to re-enroll. Participants that have received escrow monies may not re-enroll in the program.

XIII. ESCROW ACCOUNT

One of the primary incentives of FSS program participation is the opportunity to build financial assets through the FSS escrow savings account .HCD will establish an escrow account for the head of household, and make deposits to this account in accordance with Housing and Urban Development (HUD) requirements. The amount in the escrow account, in excess of any amount owed to any Public Housing Authority (PHA) by the family will be paid to the family head upon successful completion of the FSS Contract of Participation. The participating family may also be eligible to receive funds from this account if interim goals have been met. HCD may, at its discretion, disburse a portion of these funds for purposes consistent with the Contract of Participation, ITSP plan such as completion of higher education (i.e., college, graduate school), or job training, or to meet start-up expenses involved in creation of a small business, Forfeiture of escrow funds will also be in accordance with the FSS contract and HUD requirements Extension of the contract of participation will entitle the FSS family to continue to have amounts credited to the family's FSS account.

PHA provides an annual report to the family on the escrow account including, but not limited to:

- balance at the beginning of the reporting period;
- amount credited during the period;
- any deductions made from the account;
- amount of interest earned on the account; and
- total in the account at the end of the reporting period.

Interim Escrow requests- Participants must submit an interim disbursement request in writing, along with supporting documentation to their FSS Coordinator. Supporting documentation should include an explanation and verification of need in relation to meeting an ITSP goal. FSS families must also submit a price estimate/invoice that is no more than 30-days old. Interim disbursement requests will be limited to once in a period of 12 months and may not be more than 50% of the current balance of the participant's escrow account unless for the purposes of homeownership.

PHA FSS staff may request an in-person or telephone meeting with the participant and FSS Coordinator to review the interim disbursement request, ask any follow-up questions related to the request and/or to collect additional documentation from the participant. If requested, this meeting will take place within 10 business days of the submitted request. A determination to approve or deny the request for an interim disbursement will be sent to the FSS Coordinator within 2 business days of the meeting.

Requests for interim disbursement will be considered on a case-by-case basis.

Within 30 days of receipt of the interim escrow disbursement, participants must submit a receipt, bill of sale and/or account balance statement to verify the disbursement was used for its intended purpose. Failure to provide this documentation or misuse of funds may result in termination from the FSS program and/or an investigation by PHA's Compliance division. If the family receives an interim disbursement of escrow and the family does not complete its COP, the family is not required to repay PHA unless the advance payment was provided based on fraudulent information from the participant.

Final Disbursement of Escrow Funds- A participant is eligible to receive a full disbursement of their escrow account upon successful completion of the COP and completion of the ITSP goals. FSS families have no income tax liability for funds held in the escrow account or for escrow payments made at the completion of the COP. All escrow disbursements are made directly to the FSS participant.

Forfeiture of Escrow Funds- The escrow funds accrued by the participant will be forfeited if the COP is terminated due to non-compliance or non-completion of the ITSP, or the household uses their housing voucher to port-out to another PHA that does not administer an FSS program and the participation in PHA's program is ended.

Earned Income Disregard- FSS participants have the option of eliminating EID to take advantage of escrow accrued by gaining new employment. With the implementation of the modified escrow accrual model, eliminating EID is no longer a benefit to the participant for the purposes of escrow accrual.

XIV. HCV PORTABILITY

Port-Out to another PHA

If an FSS household ports-out to another PHA, they will be terminated from PHA's FSS program. PHA will not transfer the COP or any accrued FSS escrow funds to the receiving PHA.

Port-In from another PHA

PHA will enroll FSS participant from another PHA FSS program under a new COP providing FSS slots are available. If no slots for FSS are available client will be given preference second to FUP Youth applicants.

XV. FSS CONTRACT TRANSFERS WITHIN THE {PHA'S PUBLIC HOUSING AND ASSISTED HOUSING PROGRAMS

An FSS participant who is moving from one PHA housing program (Public Housing and Section 8 Assisted Housing) will be eligible to transfer their FSS participation as follows:

1. The participant must be meeting goals of the original FSS contract at the time of transfer.
2. New FSS contract - A new FSS contract for the appropriate program will be executed for the time remaining on the original contract. The commencement date on the new FSS contract will be reestablished effective with the first day of the new lease. The new FSS contract will end on the same date as the original FSS contract.
3. Escrow Accounts – The escrow balance (if any) accrued from the original contract will be held by the initial program, to be released to the participant upon successful completion of the FSS program. The participant also has the opportunity to accrue additional escrow through the subsequent contract, to be released to the participant upon successful completion of the FSS program. If successful completion of the FSS program does not occur, the escrow balance will then revert back to the appropriate housing program(s) per HUD requirements.

Conflict of Interest Clause- If a PHA HCV FSS participant is identified to have a conflict of interest (i.e. an FSS HOH or family member is employed by an HCV Contract Administrator) PHA will handle the case in line with current policy and procedure according to the HCV Administrative Plan and/or policy advisories.

XVI. GRIEVANCE PROCEDURES

If a participant feels termination from the FSS program was not justified or that they have been subjected to another adverse action related to FSS (e.g. denial of COP extension, denial of interim escrow payout), they may submit their concerns in writing to PHA FSS staff. A written determination will be provided by PHA staff to the family. The grievance and informal hearing procedures for the FSS program will follow the grievance and hearing procedures adopted for the PH and HCV programs in PHA's ACOP and HCV Administrative Plan, respectively.

XVII. PHA REPORTING REQUIREMENTS TO HUD

The PHA will report FSS data through form 50058 submissions and will submit other FSS reports as prescribed and required by HUD.