

BRAZOS VALLEY COUNCIL OF GOVERNMENTS



HOUSING CHOICE VOUCHER PROGRAM

Family Self-Sufficiency Action Plan

FAMILY SELF-SUFFICIENCY ACTION PLAN
FOR THE
BRAZOS VALLEY COUNCIL OF GOVERNMENTS
HOUSING CHOICE COUCHER PROGRAM
TX526

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I. Introduction

The Family Self-Sufficiency Action Plan describes in detail all of the requirements, procedures, and policies for the Brazos Valley Council of Governments' Housing Choice Voucher Program to administer the Family Self-Sufficiency Program.

The purpose of the Family Self-Sufficiency program is to reduce the dependency of low-income families on welfare assistance and on HCV, public assistance, or any Federal, State, or local rent or homeownership program. Resources and services are coordinated, without duplication, to assist HCV participants who are unemployed and/or under-employed to find and attain employment or better employment opportunities. This is achieved through education, skill development, supportive services, job training, and actual employment. Housing is used as the stabilizing factor. The program's goal is to build employment skills needed for each participating family to earn an income that can support the family with minimal or no public assistance.

The Brazos Valley Council of Governments (BVCOG) administers 1,901 Housing Choice Vouchers. A total of 403 mandatory FSS slots were awarded from November 1st, 1991 through December 1st, 1995. As the Family Self-Sufficiency program develops, BVCOG is committed to expanding and broadening this program to include a greater number of program participants. The current mandatory FSS mandatory size for BVCOG is 212 as of March 2016. BVCOG is serve a minimum of 337 FSS families.

The BVCOG FSS Program is committed to promoting the self-sufficiency and asset development of FSS families. Our objectives are:

- To increase the number and percentage of participants employed.
- To outreach for and provide supportive services that improve the participants' ability to obtain and maintain employment, and ultimately self-sufficiency from all government assistance
- To outreach for and provide supportive services to increase independence for the elderly or families with disabilities.

The following Action Plan for the Family Self-Sufficiency program describes BVCOG's efforts, both voluntary and mandated, to foster self-sufficiency for HCV Program participants. In order to support program participants in achieving their goals, the BVCOG Housing Choice Voucher Family Self-Sufficiency program coordinates with local agencies for the following services:

- Employment Opportunities
- Job Training
- Education
- Transportation
- Financial Counseling and Budget Development
- Home Ownership Counseling
- Credit Repair Counseling
- Life Skills Training
- Parenting Skills

- Childcare
- Health/Dental Care
- Mental Health Services
- Domestic Violence Counseling
- Marriage Counseling
- Legal Advice
- Drug Prevention/Intervention/Treatment Services
- Down Payment Assistance/Security Deposit Assistance
- Small Business Loans
- Utility Assistance

Program participants will be counseled on the importance of setting and implementing attainable goals to enhance their individual chances of success. Emphasis will be placed on job training and employment. Life skills and crisis intervention will also be in place to assist participants with any setbacks that may occur during program participation.

The Program Coordinating Committee has been established from both private and public sectors to assist BVCOG in securing commitments of public and private resources for the operation of the Family Self-Sufficiency Program. The PCC has been established from an existing committee which functions under the name of the Community Partnership Board (CPB). The PCC/CPB is composed of representatives from more than 80 agencies who meet quarterly. The PCC/CPB provides an immediate source of networking and problem solving. *[See Appendix B]*

Requirements to Administer a Family Self-Sufficiency Program

Federal Regulations require the administration of a Family Self-Sufficiency Program in the following circumstances (reference 24 CFR 984.101):

- 1) Each Public Housing Authority that received funding for public housing units under the FY 1991 and FY 1992 FSS incentive award competitions must operate a public housing FSS program.
- 2) Each Public Housing Authority that received funding for Section 8 rental certificates or rental vouchers under the combined FY 1991/1992 FSS incentive award competition must operate a Section 8 FSS program.
- 3) Each Public Housing Authority for which HUD reserved funding (budget authority) for additional rental certificates or rental vouchers in FY 1993 through October 20, 1998 must operate a Section 8 FSS program.
- 4) Each Public Housing Authority for which HUD reserved funding (budget authority) to acquire or construct additional public housing units in FY 1993 through October 20, 1998 must operate a public housing FSS program.

Section 509 of the Quality Housing and Work Responsibility Act (QHWRA) effective October 21, 1998, amends section 23 of the United States Housing Act and allows Public Housing Authorities to reduce their Family Self-Sufficiency program obligation (mandatory minimum program size, prior to any reductions previously approved by HUD) by one family for each FSS graduate fulfilling the family's Contract of Participation obligations on or after October 21, 1998. Additionally, the QHWRA

provides that the minimum FSS program size will not increase when a Public Housing Authority receives incremental Section 8 funding and public housing units on or after October 21, 1998.

The Family Self-Sufficiency Program is structured to allow the participating tenant to reach success within a period of five years. The head-of-household of the participating family signs a Contract of Participation. The purpose of the Contract of Participation is to define the head-of-household's goals and his/her commitment to achieve self-sufficiency. BVCOG will assist in providing available resources that will empower participants in reaching attainable goals. The program features the development of an escrow account to deposit a percentage of additional earned income. The escrow account is distributed upon completion of the contract as defined above or participants may request to withdraw a specific amount to reach interim goals defined in the contract. The BVCOG Housing Self-Sufficiency Specialist will work closely with clients to assist in developing and achieving their goals.

II. Family Demographics

As of June 1st, 2016, 69% of all participants in the BVCOG Housing Choice Voucher Program were located in and resided within the city boundaries of the City of Bryan. On that same date, 22% of all HCV Participants were located in the City of College Station.

For the City of Bryan, the 2010 census population was 65,660, and by 2008 the City of Bryan had grown to include 43.4 square miles and a population of 73,972, as calculated by the city's Development Services Department. The MSA (Metropolitan Statistical Area) that Bryan is located in includes College Station, Caldwell and Hearne, and represents the populations of three counties: Brazos, Burleson and Robertson.

As noted in the 2000 Census, the City of Bryan's Black population continued to be a significant minority category (11,635 persons or 17.7% of total population). The Hispanic population also showed a significant increase in the last census, with an increase from 10,892 (19.8%) to 18,271 persons or 27.8% of the total 2000 population.

For the purposes of this section, an "Area of Racial/Ethnic Minority Concentration" is a 2000 Census Tract with a total population that consists of more than 50% racial or ethnic minority residents. In Bryan, high concentrations of Black and Hispanic citizens are predominately located in the older central, west and northern neighborhoods. Most of these neighborhoods are located in Census Tracts 5, 6.03 and 6.04. Many of the dwelling units in these neighborhoods were built before 1950, and a substantial percentage of them are in poor condition.

Based on the 2000 Census, the Median Family Income (MFI) for the Bryan-College Station Metropolitan Statistical Area (MSA) was \$46,530. The 2000 National Median Family Income was \$47,800. The most recently received MFI from the U.S. Dept. of HUD for the City of Bryan is \$56,100 for a family of four. Current income eligibility requirements, based on 80%, 50% or 30% of the MFI for family size

According to 91.205 (b)(2) of the Consolidated Plan Final Rule, "...disproportionately greater need exists when the percentage of persons in a category of need, who are members of a particular racial or ethnic group, is at least 10 percentage points higher than the percentage of persons in the

category as a whole." In examining the two tables *High Concentrations of Minority Residents* and *High Concentrations of Low/Mod Income Persons*, it is observed that Census Tract 5 contained 61% Low Income Persons and 50.36% Black, Non-Hispanic residents. Additionally, Census Tract 6.03 contained 71% Low Income Persons and 68% Hispanic residents. Neither of these Census Tracts meets the definition of *Disproportionate Need*. Census Tract 4, with 51% low/mod income persons, contains 44% Black persons. Census tract 3 with 53% low to moderate income persons has 51% white persons and 30.52% Hispanics. Census tract 6.04 with 68% low to moderate income persons has 50.36% Hispanic persons. Census tract 7 with 62% low to moderate income persons has 50.30% white persons. Census tract 9 with 63% low to moderate income persons has 44.58% Hispanic. Census tract 10 with 63% low to moderate income persons has 58.27% white. None of these meet the definition of disproportionate need. Therefore, it has been discovered that there are no *Disproportionate Needs* as defined by HUD in the City of Bryan. However, the City recognizes that these census tracts contain large populations of low/mod income persons and minorities and the City considers these factors when making public policy and funding decisions.

Elderly households are 1 and 2 member household with each person being 62 or older. Out of 1,060 elderly renters, 57.3% have a housing problem. Out of 3,057 elderly owners, 20.4% have a housing problem. Again, renters have more housing problems than owners, like much of the City. In addition, 76.2% of extremely low income elderly renters and 77.7% of extremely low income elderly owners have housing problems.

Amongst the disabled, housing problems follow a similar path as with most of the City. Out of 1,314 disabled renters, 66.1% have a housing problem. Out of 2,068 disabled owners, 29.5% have a housing problem. Again, the renters fair worse than the owners. The data also demonstrates that the lowest incomes have substantially more housing problems.

The data allows us to see which groups are in higher need. Among renters, the very low income, disabled, extra elderly, and low income disabled elderly have significantly higher rates of housing problems, 100% and 89.5%, respectively. Among owners, the category listed as —all other displays the need. Very low income and low income persons in this category are in great need, 90.8% and 42.6% respectively.

The local student population is a sizeable demographic group in the Bryan-College Station MSA. Combined, Texas A&M University and Blinn College represent approximately 57,000 students locally. While the economic health of our community is directly linked to these two institutions, some of the local housing, infrastructure and public service needs are, similarly, driven by the needs of our student populations.

Using estimates from the U.S. Census Bureau's 2008 American Community Survey for Bryan, the following chart demonstrates that the majority of the Bryan population earns less than \$75,000 annually. 22% percent of Bryan residents have annual household income of less than \$15,000, while 15% of citizens earn between \$15,000 and \$25,000. Another 11% earn between \$25,000 and \$35,000, and 15% earn between \$35,000 and \$50,000, and 18% earn between \$50,000 and \$75,000 annually.

The higher income segment includes 9% with an annual household income of \$75,000 to \$100,000, 8% making between \$100,000 and \$150,000, 1% making between \$150,000 and \$200,000, and finally 2% making \$200,000 or more annually. The City of Bryan's mean annual household income is \$49,134 as compared to Texas' \$68,291.

Based on the 2008 American Community Survey, approximately 45% of Bryan families have incomes at or below the MFI (Median Family Income) for Bryan. Review of family incomes indicates that 19% of Bryan's families fall below the poverty level, higher than the county, state and nation (15%, 13% and 10% respectively). An even higher percentage of individuals fall below the poverty line (26%), which is slightly less than the county (28%), but more than the states' 16% and the nation's 13%. This very high number for individuals is likely impacted by the large number of college students in the community.

III. Estimate of Participating Families

The number of eligible FSS families who can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated Federal, tribal, State, local, and private resources is estimated to be about 400 (as of June 2016). This number is based on the average number of participants served per Housing Self-Sufficiency Specialist (50) and the number of supportive services available within the seven counties of Brazos Valley region in Texas.

BVCOG will serve as many participants as it can accommodate with current FSS program staff. Additionally, BVCOG is committed to expanding the FSS program through available and anticipated Federal, tribal, State, local and private resources. As more resources are provided to the program, staff will take on more FSS coordinating duties, enabling many more families to be served. The BVCOG will evaluate its capacity to serve more FSS participants on an ongoing basis.

IV. Number of Eligible Families from Other Self-Sufficiency Program

It is currently unknown how many current HCV Participants are participating in Operation Bootstrap, Project Self-Sufficiency, or any other local self-sufficiency program that are expected to agree to execute an FSS Contract of Participation. BVCOG may survey our HCV Participants at least once annually to determine who is currently in a local self-sufficiency program.

V. FSS Family Selection Procedures

Selection of applicants to participate in the FSS Program will be made without regard to race, color, religion, gender, disability, familial status, or national origin. Although all HCV families are encouraged to apply for the FSS Program, a family's choice to not participate in the FSS Program will not affect their participation in the HCV Program.

Each family that is selected to participate in an FSS program must enter into a Contract of Participation with the PHA that operates the FSS program in which the family will participate. The Contract of Participation shall be signed by the head of the FSS family. The Contract of Participation, which incorporates the individual training and services plan(s), shall be in the form prescribed by HUD, and shall set forth the principal terms and conditions governing participation in the FSS program, including the rights and responsibilities of the FSS family and of the PHA,

the services to be provided to, and the activities to be completed by, the head of the FSS family and each adult member of the family who elects to participate in the program.

The Contract of Participation shall specify that if the FSS family fails to comply, without good cause, with the terms and conditions of the Contract of Participation, which includes compliance with the public housing lease or the Section 8-assisted lease, the PHA may: (i) Withhold the supportive services; (ii) Terminate the family's participation in the FSS program; and/or Forfeit any Escrow Account funds accrued.

The Contract of Participation requires that the head of the FSS family shall be required under the Contract of Participation to seek and maintain suitable employment during the term of the Contract and any extension thereof. Although other members of the FSS family may seek and maintain employment during the term of the contract, only the head of the FSS family is required to seek and maintain suitable employment. BVCOG defines suitable employment as unsubsidized employment that meets the skills, education, and/or job training of the head of family and has an hourly wage that is equal to or greater than the amount of the federal minimum wage per hour as defined by Department of Labor (DOL). BVCOG defines part-time employment as employment with less than 30 hours per week. BVCOG defines full-time employment as employment with 30 or more hours per week. The obligation to seek employment is defined as the head of the FSS family has an active job search account with www.workintexas.com and is currently working with an Employment Counselor at Workforce Solutions, has applied for at least two employment opportunities in the past 30 days, has attended job interviews, and/or has otherwise followed through on employment opportunities. BVCOG shall verify the head of the family's job search through the www.workintexas.com website, Workforce Solutions, and/or internal job search forms. The obligation to maintain employment is defined as the head of the FSS family has been employed for a minimum of 15 days prior to the contract completion date. The head of the family must be employed at the time of contract completion in order to be disbursed the funds from the escrow account.

BVCOG may, in writing, extend the term of the Contract of Participation for a period not to exceed two years for any FSS family that requests, in writing, an extension of the Contract, provided that BVCOG finds that good cause exists for granting the extension. The family's written request for an extension must include a description of the need for the extension. "Good Cause" means circumstances beyond the control of the FSS family, as determined by BVCOG, such as a serious illness or involuntary loss of employment. Extension of the Contract of Participation will entitle the FSS family to continue to have amounts credited to the family's FSS account.

BVCOG Policy

BVCOG will consider the following situations as "Good Cause" to determine if it is necessary to grant a Contract extension:

1. Extenuating circumstances (e.g. hospitalization, illness, incapacitation, or a family emergency) for an extended period of time that has affected the head of household's ability to seek and maintain suitable employment for a period of more than thirty (30) days during the term of the Contract.
2. The family was prevented from seeking and maintaining employment due to a

- disability.
3. There were insufficient or unavailability of resources to fulfill the goals of the FSS contract (i.e. not enough classes at the post-secondary institution to complete a certificate and/or degree).
 4. The FSS participants had an involuntary loss of employment with the exception of termination from employment to the FSS participant's performance on the job.

Any extension must be approved by the FSS Coordinator.

BVCOG Local Selection Procedures

BVCOG has the option of giving a selection preference for up to 50 percent of its public housing FSS slots and of its Section 8 FSS slots respectively to eligible families, as defined in 24 CFR § 984.103, who have one or more family members currently enrolled in an FSS related service program or on the waiting list for such a program. BVCOG may limit the selection preference given to participants in and applicants for FSS-related service programs to one or more eligible FSS related service programs. If BVCOG chooses to exercise the selection preference option must include the following information in its Action Plan: (1) The percentage of FSS slots, not to exceed 50 percent of the total number of FSS slots for each of its FSS programs, for which it will give a selection preference; (2) The FSS-related service programs to which it will give a selection preference to the programs' participants and applicants; and (3) The method of outreach to, and selection of, families with one or more members participating in the identified programs.

BVCOG Policy

BVCOG will not give any selection preference to eligible families who have one or more family members currently enrolled in an FSS-related service program or on the waiting list for such a program.

For those FSS slots for which BVCOG chooses not to exercise the selection preference provided in this section, the FSS slots must be filled with eligible families in accordance with an objective selection system, such as a lottery, the length of time living in subsidized housing, or the date the family expressed an interest in participating in the FSS program. The objective system to be used by BVCOG must be described in BVCOG's Action Plan.

BVCOG may screen families for interest, and motivation to participate in the FSS program, provided that the factors utilized by BVCOG are those which solely measure the family's interest, and motivation to participate in the FSS program. Permitted motivational factors include requiring attendance at FSS orientation sessions or pre-selection interviews, and assigning certain tasks which indicate the family's willingness to undertake the obligations which may be imposed by the FSS Contract of Participation. However, any tasks assigned shall be those which may be readily accomplishable by the family, based on the family members' educational level, and disabilities, if any.

Reasonable accommodations must be made for individuals with mobility, manual, sensory, speech impairments, mental or developmental disabilities. Prohibited motivational screening factors include the family's educational level, educational or standardized motivational test results, previous job history or job performance, credit rating, marital status, number of children, or other

factors, such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or non-minority groups.

BVCOG Policy

BVCOG will fill FSS slots with eligible families based on the date the family expressed an interest and motivation to participate in the FSS program. BVCOG will use two different selection procedures based on when FSS slots are available and when FSS slots are not available. The definition of the availability of a mandatory FSS slot pertains to when a mandatory slot for the FSS program is not currently filled by an active participant in the program.

When mandatory FSS slots are available:

BVCOG will screen families for interest and motivation to participate in the FSS program on a regular basis. A regular basis is defined here as either monthly or quarterly. The motivational factors that BVCOG will use include: 1) requiring attendance at an FSS orientation session; 2) requiring attendance at an FSS pre-selection interview with BVCOG staff; 3) completion and return of an FSS Application; (4) completion of Texas Adult Basic Education (TABE) testing if applicable; or (5) completion a Needs Assessment with the Housing Self-Sufficiency Specialist. Failure to complete one (1) or more of the above motivational factors shall result in denial of eligibility for the FSS Program.

At the time of an FSS orientation or pre-selection interview, families will be briefed prior to executing the Contract of Participation on: 1) the benefits and reasons to join the FSS Program; 2) the rights and responsibilities of the FSS family while participating in the FSS program; 3) the services to be provided to the family; and 4) the activities to be completed by the head of the FSS family and each adult member of the family who elects to participate in the program. An FSS application packet (mailed or given directly to the family) will provide the same information to the family as provided in an FSS orientation session or a pre-selection interview.

After the family is provided an FSS orientation, application packet or pre-selection interview by BVCOG, the family will be offered the opportunity to join the FSS Program. If the family decides to join the program, the family will be required to execute a Contract of Participation. Any BVCOG staff may execute a Contract of Participation with the family so long as the family has been screened for interest and motivation to participate in the FSS program.

When mandatory FSS slots are not available:

When FSS slots are not available, BVCOG will screen families for interest and motivation to participate in the FSS program as new slots become available on an as-needed basis to fill the slots. The motivational factors and procedures that BVCOG will use when FSS slots are not available include all of the policies and procedures listed above when FSS slots are available.

BVCOG will make reasonable accommodations for those persons with disabilities who require such accommodation in order to meet the criteria for their interest and motivation to participate in the FSS program.

The income and rent numbers to be inserted on page one of the Contract of Participation may be taken from the amounts on the last reexamination or interim determination before the family's initial participation in the FSS program, unless more than 120 days will pass between the effective date of the most recent HUD Form 50058 submitted and the effective date of the Contract of Participation.

BVCOG Policy

Prior to executing a Contract of Participation with the family, the family will be informed that their most current annual income reported on a HUD Form 50058 will be entered into their Contract of Participation and as long as it is not more than 120 days old between the effective date of the HUD Form 50058 and the effective date of the Contract of Participation. In a case when the HUD Form 50058 is more than 120 days old, BVCOG will allow the FSS participant to choose whether or not it is more appropriate for BVCOG to obtain supporting documentation to submit a new HUD Form 50058 for an Interim Reexamination or wait until their next Annual Reexamination to enroll in the FSS Program.

VI. Incentives

Escrow Account

Families participating in the FSS Program can accumulate money in an escrow account (or "savings account") when their earned income increases. Each time the family's earned income increases as compared to their earned income at the date they signed the FSS Contract of Participation, a percentage of the additional amount they would pay towards rent is deposited into an escrow account. The calculation is based on federal regulations as defined in 24 CFR 984.305 (b) FSS credit.

The FSS credit shall be computed as follows: (i) for FSS families who are very low-income families, the FSS credit shall be the amount which is the lesser of: (A) thirty percent of their current monthly adjusted income less the family rent, which is obtained by disregarding any increases in earned income from the effective date of the FSS Contract of Participation; or (B) the current family rent less the family rent at the time of the effective date of the FSS Contract of Participation.

For FSS families who are low-income families but not very low-income families, the FSS credit shall be 80 percent of the amount determined according to the paragraph above. FSS families who are not low-income families shall not be entitled to any FSS credit. BVCOG shall not make any additional credits to the FSS family's FSS account when the FSS family has completed the FSS Contract of Participation or when the FSS Contract of Participation is terminated or otherwise nullified.

BVCOG deposits the FSS account funds for each family into a main escrow account which has a separate General Ledger Account. The FSS General Ledger Account will consist of subsidiary ledgers containing individual information on each FSS participant including but not limited to: name of participant; date participant entered the FSS program; individual escrow transactions by

date and amount; interest earned on individual balances; and the date that the account is terminated or fully disbursed. The main escrow account may be invested in investments approved by HUD. Interest earned on the main escrow account will be earned on a monthly basis and allocated to the individual account. During the time of the FSS Contract of Participation, BVCOG shall credit periodically, at least annually, to each families' FSS account, the amount of FSS credit determined in accordance with 24 CFR §984.305(b).

In accordance with 24 CFR §984.305(2)(iii), if the FSS family has not paid the family contribution towards rent, or other amounts, if any, due under the HCV program, the balance in the family's FSS account shall be reduced by that amount (as reported by the owner to BVCOG) before prorating the interest income. If the FSS family has fraudulently underreported income, the amount credited to the FSS account will be based on the income amounts originally reported by the FSS family.

The amount in the family's escrow, less any amount owed to BVCOG, will be paid to the head of the FSS family when (1) BVCOG has verified that the family has met its obligations under the contract of participation on or before the contract's expiration date, including that the head of the FSS family submits a certification that, to the best of his or her knowledge, that no member of the FSS family has been a recipient of welfare of a minimum of 12 months prior to meeting their obligations and/or contract expiration date; or (2) whenever 30 percent of the family's monthly adjusted income equals or exceeds the existing housing Fair Market Rent for the size of the unit for which the FSS qualifies based on BVCOG's occupancy standards, and at the time of contract completion, the head of the family can certify that no family members are a recipient of welfare assistance.

Before disbursement of the FSS account funds to the family, BVCOG may verify that the FSS family is no longer a recipient of welfare assistance by requesting copies of any documents which may indicate whether the family is receiving any welfare assistance, and contacting welfare agencies.

BVCOG Policy

BVCOG will conduct a third-party verification to verify that no member of the FSS family is a recipient of welfare assistance.

If the head of the FSS family ceases to reside with other family members in the public housing or the Section 8-assisted unit, the remaining members of the FSS family, after consultation with BVCOG, shall have the right to designate another family member to receive the funds in the FSS escrow account.

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

- (i) The FSS Contract of Participation is terminated; or
- (ii) The FSS Contract of Participation is completed by the family, but the FSS family is receiving welfare assistance at the time of expiration of the term of the FSS Contract of Participation, including any extension thereof.

Interim Disbursements from FSS Escrow Account

If BVCOG determines that the FSS family has fulfilled certain interim goals established in the FSS Contract of Participation and needs a portion of the FSS account funds for purposes consistent with their FSS Contract of Participation, 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, BVCOG, at BVCOG's sole discretion, may disburse a portion of the funds from the family's FSS account to assist the family meet those expenses.

BVCOG Policy

An FSS family must request in-writing an interim disbursement from their FSS Escrow Account. BVCOG will review the family's request and notify the family within 20 business days of BVCOG's approval or denial of the request. Requests will be reviewed by the FSS Coordinator, which will recommend approval or denial of the requests. The Executive Director or his/her designee must grant final approval prior to the disbursement.

BVCOG may approve at any time an interim disbursement no greater than 25% of the total amount in the FSS escrow account for purposes consistent with the family's FSS Contract of Participation. A maximum of two interim disbursements for the life of the Contract of Participation will be approved per FSS participant.

VII. Outreach Efforts

Extensive Outreach

When slots are available, BVCOG will distribute monthly and/or quarterly newsletters describing the FSS Program to all HCV participants. The newsletter will contain information on the benefits of joining the FSS program and how to join the FSS program. The newsletter will contain an FSS Interest Form to be filled out and returned by the family.

When slots are available, BVCOG will also distribute brochures to every HCV participant at the time of their annual, repair, or initial inspection. If the family is not home, BVCOG will leave the brochure at the front door of the family. BVCOG will also distribute brochures to every HCV participant who physically comes into the office of BVCOG. The brochure will contain information on the benefits of joining the FSS program; how the program works; and how to join the FSS program.

Upon receipt of the FSS interest form or application, the FSS Coordinator will contact HCV participants who have demonstrated interest regarding the next FSS orientation session; to schedule them for a pre-selection interview; or send them an FSS packet. After the FSS orientation session and pre-selection interview those residents who wish to enter the FSS Program will be admitted based on the preferences and procedures outlined in Section V of this Action Plan.

Whenever possible, BVCOG staff will attend volunteer fairs, job fairs, and other networking (booth) initiatives in order to contact HCV participants who may be eligible for FSS.

In order to assure that both minority and non-minority groups are informed about the FSS program, BVCOG will: 1) attend public events that serve all cultural groups in the community; 2) provide translation services during a pre-selection interview or FSS orientation sessions to any HCV participants who do not speak English; 3) provide information in both English and Spanish whenever possible.

Outreach Efforts to Service Providers

Outreach efforts to service providers will be on-going in order to develop resources and support to aid FSS participants in achieving their goals. The FSS Program Coordinating Committee will also provide outreach efforts to local area service providers to secure commitments from them for the benefit of FSS participants.

BVCOG serves as a member in several community-based groups to actively promote the FSS Program and expand partnerships to enhance resources for FSS participants. These groups include but are not limited to:

- CPB (Community Partnership Board)
- BVCH (Brazos Valley Coalition for Homelessness)
- THA (Texas Housing Association)
- SETHA (Southeastern Texas Housing Association)
- TXNAHRO (Texas Chapter- National Association for Housing and Re-Development Organizations)
- NAHRO (National Association for Housing and Re-Development Organizations)
- Bank on Brazos
- DASH (Decent Affordable Safe Housing)
- Brazos Valley Regional Transportation Workgroup
- VOAD (Volunteer Organizations Active in Disaster)
- Brazos Valley Housing Consortium

VIII. FSS Activities and Supportive Services

BVCOG will use a team approach model to guide a FSS family towards self-sufficiency from government assistance. The team will consist of a Housing Self-Sufficiency Specialist, a FSS Coordinator for Financial Counseling and Credit Repair, a FSS Coordinator for Education and a FSS Coordinator To Increase Job Opportunities and Navigate the Workforce Solutions Programs.

Delivery of Services

Housing Self-Sufficiency Specialist

The Housing Self-Sufficiency Specialist will complete the following tasks, including but not limited to:

1. Needs Assessment at the time of FSS Contract execution:
 - a. Individual Training and Services Plan developed
 - i. Each family member assessed
 - ii. Determine goals and barriers to achieving FSS
 - iii. Determine services needed by family
 - b. Case conference - to set up delivery of services
2. Maintaining data of what services are needed and rendered.
3. Maintaining minimum of monthly contact with family.

4. Building a supportive rapport with the participants, providing guidance and support as the participants implement their Individual Training and Services Plan.
5. Determining compliance with the Individual Training and Services Plan.
6. The Program Coordinating Committee oversees the operation of the program and resolves interagency issues.

FSS Coordinator for Financial Counseling and Credit Repair

In addition to a BVCOG case manager who will be responsible for assessing and referring FSS families to partnering agencies, BVCOG has on staff a FSS Coordinator dedicated to providing financial counseling and credit repair for all FSS families.

The FSS Coordinator for Financial Counseling and Credit Repair will be responsible in providing services including, but not limited to:

1. Providing and/or coordinating the delivery of financial coaching and counseling services
2. Providing one-on-one financial coaching services with the goal to help FSS families proactively take control of their finances at crucial moments in their lives, and empower them to make better-informed decisions regarding consumer financial products and services;
3. Leading FSS families through a collaborative process that guides them in setting or refining their goals, developing action plans to meet those goals, coaching them in goal advancement, and ultimately achieving the goal(s);
4. Helping FSS families stay on top of their goals and monitor and document their progress over time using a case management and outcome tracking system with the ultimate goal of empowering them to proactively take control of their financial lives;
5. Leveraging financial coaching techniques to assist FSS families in achieving specific short-term and long-term financial goals;
6. Delivering focused financial coaching strategies that promote behavior change such as goal-setting, accountability, and confidence-building;
7. Developing strategic, behavior-focused activities to help clients meet their financial goals;
8. Identifying appropriate ways to support client's goal achievement using coaching skills (accountability, check in/follow up);
9. Providing information, guidance and assistance in:
 - a. Budget/financial planning
 - b. Debt reduction, management and avoidance strategies
 - c. Savings strategies and methods (e.g. how to save for emergencies, unanticipated contingencies, and major purchases such as a house or car)
 - d. Credit management (e.g. credit repair or credit building)
 - e. Addressing the financial needs during transition, including Military transition financial needs (e.g. cost of living analysis, tax and insurance considerations when transitioning to civilian life)
 - f. Information and/or referral as required based on the client financial needs and goals.

FSS Coordinator for Education and Counselling

BVCOG also has on staff a FSS Coordinator dedicated to providing educational counselling for all FSS families. The FSS Coordinator for Financial Counseling and Credit Repair will be responsible in providing services including, but not limited to:

1. Providing direction and guidance to FSS participants on educational material that is needed in order to earn their General Education Diploma (GED)
2. Assessing the FSS participants' readiness to take the GED exam
3. Ensuring that the educational goals included in the FSS Participants' Contracts of Participation and Individual Training and Services Plans are met on a regular, ongoing and satisfactory basis;
4. Working with the Program Coordinating Committee (PCC) and with local service providers to ensure that FSS participants are linked to the supportive services they need to attain self-sufficiency;
5. Provide on-going counseling and case management for FSS participants in regards to their educational goals;
6. Maintaining a referral and networking system for essential and support services.
7. Publishing monthly marketing materials to incentivize FSS participants and interested applicants;
8. Organizing and/or coordinating program workshops and self-sufficiency activities;
9. Providing program orientations to potential FSS families;
10. Communicate and network with community agencies, private industry and the general public for the purpose of obtaining resources and self-sufficiency related services while promoting the FSS Program.

FSS Coordinator To Increase Job Opportunities and Navigate the Workforce Solutions Programs

The purpose of this FSS Coordinator is to develop job opportunities for BVCOG FSS families and assist the FSS family navigate through all applicable Workforce Solutions Programs.

Responsibilities for this FSS Coordinator of include but are not limited to:

- a. Facilitating access to Workforce Solutions employment and training programs for FSS families;
- b. Working with FSS families in conjunction with other FSS staff to achieve self-sufficient employment as identified on the FSS families' Employment Plan;
- c. Identifying barriers to employment that are common amongst FSS families and making recommendations to other FSS staff on how to overcome these barriers
- d. Contacting local employers to develop employment opportunities for individual FSS participants in coordination with Workforce business services supervisor;
- e. Coordinating and tracking FSS families that have been referred to Workforce Solutions programs;
- f. Counselling FSS families who present unusual placement or job adjustment problems in conjunction with other FSS staff;

- g. Communicating and networking with community agencies, private industry and the general public for the purpose of obtaining resources and self-sufficiency related services while promoting the FSS Program.
- h. Referring FSS families to community resources as needed.

Partnerships with Public and Private Entities

BVCOG will also provide on-going support, follow-up, tracking, counseling, referrals, and various supportive services to the families via the BVCOG Workforce Solutions office and non-profit service providers in the community.

BVCOG will form partnerships with public and private entities to provide opportunities that enable and empower FSS families to become self-sufficient. The public and private entities will work together to marshal resources for the FSS program, including resources such as employment opportunities, job training, educational assistance, transportation services, child care assistance, homeownership education, and counseling services. BVCOG staff will work to continually expand the range of available services through the partnerships.

Partnerships with public entities and the supportive services to be provided:

Public Entity	Support Services
Workforce Solutions of the Brazos Valley	Job training; transportation services; employment opportunities; educational assistance
Aging and Disability Resource Centers	Referral service for people with disabilities
Area Agency on Aging	Counseling services; health insurance enrollment
Brazos Valley Food Bank	Nutritional Assistance
Child Care Management Services	Child care assistance
Workforce Board	General Education Diploma
Project Unity	Educational assistance; counseling services; parenting classes
United Way	Counseling services; service coordination
Blinn College	Educational assistance; counseling services; job training; child care assistance
Texas A&M	Educational assistance; job training
Brazos Valley Affordable Housing Corporation	Homeownership counseling; employer-based small dollar loan
Financial Fitness Center	Credit repair; homeownership counseling; financial counseling
City of Bryan	Down payment assistance; home repair
City of College Station	Down payment assistance; tenant-based rental assistance for deposit assistance
Elder Aid	Supportive services; housing
Brazos Valley Community Action Agency	Head Start and Early Head Start Programs; nutritional counseling; nutritional assistance; transportation assistance, educational assistance;

	child care assistance, case management; rental assistance; housing
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IX. Method for Identification of Family Support Needs

The FSS program will identify the needs of FSS participants when the family initially joins the FSS program and on a quarterly basis. At the time of executing the FSS Contract and the Individual Training and Service Plan, BVCOG staff will ask the following questions:

1. What skills and work experience do you have and what are your interests?
2. What are your most recent jobs held?
3. Do you have any transferable skills from your other jobs?
4. What is your dream job?
5. What kind of skills and/or training do you think you will need for that job?
6. What schools have you attended and/or attended?
7. What did you study at those schools?
8. What education does your household members have?
9. What are you in most need of first, i.e. child care, transportation, training, education, etc.?
10. Do you have a history of substance (i.e. alcohol or drug abuse)?
11. What do you hope to accomplish at the end of your FSS participation?
12. What goals do you wish to accomplish in three months? In six months? In one year? In two years? In three years?
13. What activities need to happen before you complete each goal?

In order to deliver the services and supportive activities according to the needs of each FSS participant, BVCOG staff will do the following:

1. Contact employed FSS participants on a quarterly basis to determine progress made toward interim goals via telephone contact, personal interviews, or group meetings and to provide referrals as needed.
2. Contact non-employed FSS participants at least once every month to inform them of supportive services, job leads, and events happening at the Workforce Center.
3. Work to obtain services on behalf of the FSS participant.
4. Work with public entities to provide referrals, research job opportunities, and expand the supportive services available to FSS families.
5. Communicate job opportunities (including job fairs) and supportive services available to all FSS families.
6. Maintain an electronic file documenting tasks and accomplishments made toward achieving goals for all FSS participants using housing software.
7. Conduct quarterly group meetings for current participants.
8. Provide quarterly updates to the Program Coordinating Committee on FSS program participants’ progress and on their employment and achievement of interim goals.

X. Portability of FSS Participation

When can an FSS family port

A FSS family must lease in the assisted unit for a minimum period of 12 months after the effective of the contract of participation, within BVCOG’s seven-county jurisdiction. However, in

accordance with 24 CFR 984.306, BVCOG may approve a family's request to relocate outside its jurisdiction under portability during the initial 12 months.

BVCOG Policy

BVCOG will not allow portability of FSS participation during the initial 12 months.

After the initial 12 months, the FSS family may move outside BVCOG's seven-county jurisdiction under portability procedures.

Which FSS Program Can the Family Participate In

The relocating FSS family may continue to participate in the FSS program at BVCOG if the family can demonstrate that it will be able to fulfill its responsibilities under the contract of participation at its new residence. If a family is unable to demonstrate compliance, the FSS family's contract of participation will be terminated by BVCOG and any funds in the escrow account will be forfeited.

If the PHA agrees and is able to, the FSS family may also choose to participate in the FSS program with the PHA in which its new residence will be located.

BVCOG will work closely with the other PHA, regardless of which FSS program the family participates in, to ensure an easier transition for the FSS family.

XI. Program Termination, Withholding of Services, and Grievance Procedures

Termination of FSS Contract of Participation

The FSS Contract of Participation may be terminated before the expiration of the contract term, and any extension thereof, for the following reasons:

- 1) The Contract of Participation is automatically terminated if the family's rental assistance is terminated in accordance with HUD requirements;
- 2) Mutual consent of the parties;
- 3) The failure of the FSS family to meet its obligations under the FSS Contract of Participation without good cause, including in the Section 8 FSS program, the failure to comply with the contract requirements because the family has moved outside the jurisdiction of BVCOG;
- 4) The family's withdrawal from the FSS program;
- 5) Such other act as is deemed inconsistent with the purpose of the FSS program; or Operation of law.

Termination or Withholding Supportive Services for the FSS Contract of Participation

BVCOG may terminate or withhold the supportive services and the FSS family's participation in the FSS program, if BVCOG determines, in accordance with the hearing procedures provided in 24 CFR 982.555 that the FSS family has failed to comply without good cause with the requirements of the FSS Contract of Participation as provided above.

If BVCOG terminates the Contract of Participation, the FSS participant will not be allowed to

participate in any FSS programs administered by BVCOG for one full-year.

Grievance Procedures

Informal reviews are provided for FSS participants. Informal reviews are intended to provide an opportunity for the FSS participant to appeal a decision to terminate their Contract of Participation; withhold supportive services; and/or withhold for a certain period of time the family's participation in the FSS program; and/or forfeit any amount of the escrow account funds.

Decisions Subject to Informal Review

BVCOG will give an FSS participant the opportunity for an informal review of a decision to terminate their Contract of Participation; withhold supportive services; and/or withhold for a certain period of time the family's participation in the FSS program. Withholding of supportive services may include refusing to provide any supportive services available under the FSS program

Notice to the FSS Participant

BVCOG must give an FSS participant prompt notice of a decision to terminate their Contract of Participation; withhold supportive services; and/or withhold for a certain period of time the family's assistance. The notice must contain a brief statement of the reasons for the decision, and must also state that the FSS participant may request an informal review of the decision. The notice must describe how to obtain the informal review.

Scheduling an Informal Review

BVCOG Policy

A request for an informal review must be made in writing and delivered to BVCOG either in person or by first class mail, by the close of the business day, no later than ten (10) business days from the date of BVCOG's notice to the FSS participant to withhold, deny or terminate participation in the FSS program or HCV program.

BVCOG must schedule and send the results of the informal review within ten (10) business days of the family's request.

Informal Review Procedures

BVCOG Policy

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The FSS participant must be provided an opportunity to present written or oral objections to the decision of BVCOG.

The person conducting the review will make a recommendation to BVCOG, but BVCOG is responsible for making the final decision as to whether assistance should be granted, resumed, or denied.

Informal Review Decision

BVCOG must notify the FSS participant of BVCOG's final decision, including a brief statement of the reasons for the final decision.

BVCOG Policy

In rendering a decision, BVCOG will evaluate the following matters:

- The validity of grounds for denial or termination of participation in the FSS program. If the grounds for denial are not specified in the regulations, then the decision to deny or terminate participation could be overturned.
- The validity of the evidence. BVCOG will evaluate whether the facts presented prove the grounds for denial or termination of participation in the FSS program.

BVCOG will notify the FSS participant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within ten (10) business days of the informal review, to the FSS participant and his or her representative, if any, along with proof of mailing.

XII. Assurance of Non-Interference

A family's election not to participate in the FSS program will not affect the family's admission to public housing or to the Section 8 program or the family's right to occupancy in accordance with its lease.

XIII. Timetable for Implementation

The operation of a local FSS program must begin within 12 months of the earlier of notification to BVCOG of HUD's approval of the incentive award units or of other funding that establishes the obligation to operate an FSS program. Operation means that activities such as outreach, participant selection, and enrollment have begun. Full delivery of the supportive services to be provided to the total number of families required to be served under the program need not occur within 12 months, but must occur by the deadline.

BVCOG must have completed enrollment of the total number of families required to be served under the FSS program (based on the minimum program size), and must have begun delivery of the supportive services within two years from the date of notification of approval of the application for new public housing units for a public housing FSS program or for new rental certificates or rental vouchers for a Section 8 FSS program.

HUD may extend the deadline set forth in either paragraph above if BVCOG requests an extension, and HUD determines that, despite best efforts on the part of BVCOG, the development of new public housing units will not occur within the deadlines set forth in the first paragraph above, the commitment by public or private resources to deliver supportive services has been withdrawn, the delivery of such services has been delayed, or other local circumstances warrant an extension of the deadlines set forth in the first paragraph above.

BVCOG may employ appropriate staff, including a service coordinator or program coordinator to administer its FSS program, and may contract with an appropriate organization to establish and administer the FSS program, including the FSS account, as provided by § 984.305.

BVCOG Policy

When FSS slots are available, BVCOG will screen families for interest and motivation to participate in the FSS program on a regular basis following the procedures and policies under Section V: FSS Family Selection Procedures.

When FSS slots are not available, BVCOG will screen families for interest and motivation to participate in the FSS program as new slots become available on an as-needed basis to fill the slots following the procedures and policies under Section V: FSS Family Selection Procedures.

XIV. Certification of Coordination

This is to certify that development of the services and activities under the FSS program has been coordinated with Workforce Solutions of Brazos Valley including Workforce Investment Opportunity Act and any other relevant employment, child care, transportation, training, and education programs in the jurisdiction of BVCOG, and that implementation will continue to be coordinated, in order to avoid duplication of services and activities.

XV. Optional Information

BVCOG has no optional information to provide at this time that would help HUD determine the soundness of BVCOG's FSS program.

APPENDIX A
GLOSSARY OF ABBREVIATIONS AND ACRONYMS

AAF Annual Adjustment Factor. A factor published by HUD in the Federal Register which is used to compute annual rent adjustment.

ACC Annual Contributions Contract

BVCOG Brazos Valley Council Governments, the "PHA"

CFR Code of Federal Regulations. Commonly referred to as "the regulations".

ELI Extremely low income

FICA Federal Insurance Contributions Act - Social Security taxes

FMR Fair Market Rent

FSS FAMILY SELF SUFFICIENCY

FY Fiscal Year

FYE Fiscal Year End

GED General Education Diploma

GR Gross Rent

HAP Housing Assistance Payment

HOH Head of Household

HQS Housing Quality Standards

HUD The Department of Housing and Urban Development or its designee.

IRA Individual Retirement Account

MSA Metropolitan Statistical Area established by the U.S. Census Bureau

PHA Public Housing Agency

PMSA A Primary Metropolitan Statistical Area established by the U.S. Census Bureau

PS Payment Standard

QC Quality Control

RFTA Request for Tenancy Approval

SSMA Standard Statistical Metropolitan Area. Has been replaced by MSA, Metropolitan Statistical Area

SRO Single Room Occupancy

TR Tenant Room

TTP Total Tenant Payment

UA Utility Allowance

URP Utility Reimbursement Payment

APPENDIX B

MEMBER AGENCIES FOR THE COMMUNITY PARTNERSHIP BOARD (CPB)

1. Aggieland Pregnancy Outreach, Inc
2. American Red Cross
3. Better Business Bureau
4. Big Brothers/Big Sisters
5. Brazos County Coalition Against Domestic Violence
6. Brazos County Community Supervision
7. Brazos County Health Dept
8. Brazos County Juvenile Services
9. Brazos Valley Care Coordination
10. Brazos Valley Coalition for the Homeless
11. Brazos Valley Center for Independent Living (BVCIL)
12. Brazos Valley Food Bank
13. Brazos Valley Workforce Board
14. Bryan Police Department
15. Bryan Community Development
16. Bryan Housing Authority
17. Bryan ISD
18. BRYAN ISD Adult Learning Center
19. BRYAN ISD Homeless Education Program
20. BRYAN ISD Special Programs, Parent Involvement
21. Brazos County Community Supervision
22. BV Affordable Housing Corporation
23. BV Council of Governments
24. BV Council of Governments Section 8 Housing Choice Voucher Program
25. Brazos Valley Community Action Agency (BVCAA)
26. BVCAA Health Point
27. BVCAA Early Head Start
28. BVCAA Energy/Housing Services
29. BVCAA Head Start
30. BVCAA Women, Infants, Children (WIC)
31. Brazos Valley Council on Alcohol and Substance Abuse
32. BVCOG -R White Title II Admin Agency
33. BVCOG--Area Agency on Aging
34. Burleson Health Resource Center
35. Catholic Charities of Central Texas
36. Children Ninos
37. College Station Community Development
38. College Station Police Department
39. College Station Independent School District (CSISD)
40. CSISD Head Start
41. DARS--Division for Blind Services
42. Dept of Family & Protective Services
43. Grimes Health Resource Center
44. Habitat for Humanity
45. Health for All
46. La Hacienda Intensive Outpatient Center
47. Leon Health Resource Center
48. Madison Health Resource Center
49. Mental Health Mental Retardation Authority of the Brazos Valley
50. MHMR Children's Services
51. National Alliance on Mental Illness (NAMI)
52. Early Childhood Intervention (ECI)
53. Pride Community Center
54. Project Unity
55. Sexual Assault Resource Center, Brazos Valley
56. Scotty's House
57. St. Joseph Health System
58. St. Vincent de Paul
59. TAMU Rural Public Health
60. Texas AgriLife Extension
61. Texas Medicaid
62. Texas Workforce Commission
63. The Prenatal Clinic
64. Third Day Treatment Center
65. Twin City Mission
66. Twin City Mission Phoebe's Home
67. Twin City Mission STAR Program
68. United Way
69. United Way/211-Texas
70. Voices For Children