

PROPOSED FSS ACTION PLAN

In May of 2022, HUD issued a new final rule amending the federal regulations that apply to the Family Self-Sufficiency Program administered by Lake MHA. Lake MHA has proposed amendments to its FSS Action Plan to comply with the HUD final rule.

FSS applicants, participants, or other interested parties may submit written comments regarding the proposed policy to Lake MHA in person, by mail, or by emailing mfurman@lakemetrohousing.org. Written comments must be received by Lake MHA by 5:00 P.M. on September 9, 2022. The proposed policy may be viewed on Lake MHA's website (www.lakehousing.org) or in Lake MHA's administrative office.

The proposed policy is subject to change.

Summary of Major Changes

- FSS participants only have to be “welfare-free” at the time of graduation, rather than for a period of 12 months prior to graduation under the old rule
- The base CoP is longer – the initial end date is 5 years from the first recertification of income after the effective date. The effective date would remain the same but FSS families would have the potential of being on the program for a longer period of time, therefore allowing for the potential to earn more escrow
- The definition of “good cause” for an extension of the CoP end date has been broadened, allowing for more people to earn escrow for a longer period of time
- The Head of the FSS family does not have to be the Head of Household for the HCV Program
- There is a new possibility of termination from the FSS program with an escrow disbursement in certain circumstances
- Any forfeited escrow funds will be used for the benefit of all FSS participants

Any questions about changes to the FSS program can be directed to Janyce Richburg, FSS Coordinator at jrichburg@lakemetrohousing.org or 440-354-3347, extension 34.



ACTION PLAN FOR THE FAMILY SELF-SUFFICIENCY PROGRAM

**Revised
2022**

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Introduction

The mission of the Lake Metropolitan Housing Authority (Lake MHA) is to advocate for, develop, and sustain affordable housing opportunities for the residents of Lake County. We support and encourage residents to attain self-sufficiency while maintaining a customer-centered focus. Therefore, Lake MHA is pleased to have the opportunity to administer the Family Self-Sufficiency Program (FSS) offered by the Department of Housing and Urban Development (HUD).

The purpose of Lake MHA's FSS Program is to offer families participating in Lake MHA's Housing Choice Voucher Program (including those receiving FUP, VASH, or Mainstream vouchers and those in the Homeownership Program), an opportunity to achieve economic and social independence. Lake MHA's objective is to promote local strategies that coordinate HCV rental vouchers with existing public and private resources to assist extremely low and very low-income families in becoming free of all government assistance.

Lake MHA welcomes the opportunity to encourage and assist clients in increasing their earned income thereby increasing their ability to become economically independent. Lake MHA will maintain inter-agency partnerships to achieve high quality comprehensive service in-house, in addition to outreach programs to ensure comprehensive service delivery. The delivery of services and planning for the FSS Program will be coordinated with various community resources to deliver the highest quality assistance available to clients.

The FSS Program will be administered by the FSS Coordinator. The FSS Coordinator will perform outreach, recruitment, and retention of FSS participants, work on goal setting, case management, and coaching of FSS participants, and track program performance. The FSS Coordinator will also work with community and service partners and meet regularly with the Program Coordinating Committee (PCC). The PCC will be composed of at least one Lake MHA representative (the FSS Coordinator), at least one HCV participant, and Lake MHA's community and service partners. The PCC's primary function is to secure commitments from public and private resources for the operation of the FSS Program within Lake MHA's jurisdiction, including assistance in developing the Action Plan and implementation of the Program.

Families agreeing to participate in the FSS Program must enter into a Contract of Participation (CoP) and an Individual Training and Service Plan (ITSP), which will specify the family’s responsibilities and goals. Lake MHA will create an escrow account for families participating in the FSS program when their earned income has increased since the effective date of their CoP and their rental amount has increased as a result of the income. Families that meet their interim goals identified in their ITSP may withdraw funds from their escrow account to pay for approved uses, such as college tuition, transportation, childcare, and other criteria established by Lake MHA. The CoP is set for a time period of five years, although Lake MHA may extend a CoP for up to an additional two years when “good cause” is demonstrated. The goal of the FSS program is to have families successfully complete their CoP and all ITSPs, which will result in disbursement of the family’s escrow account fund to the family.

This document amends the 2016 FSS Action Plan, in accordance with HUD’s May 17, 2022, final rule implementing the reauthorization of the FSS Program, passed as part of the Economic Growth, Regulatory Relief, and Consumer Protection Act in 2018 (codified, in relevant part, at 24 CFR Part 984). This revised Action Plan will serve as the permanent FSS Action Plan in accordance with 24 CFR § 984.201.

Family Demographics

The Lake MHA Housing Choice Voucher Program has 1534 awarded ACC units. At the time of this update (August 2022) 1203 units are leased. This total includes 22 families with Mainstream vouchers, 17 families with FUP vouchers, 15 families with VASH vouchers, 3 Homeownership Program families, and 9 families under portability billing arrangements.

Race and Ethnicity		Voucher Sizes		Elderly/Disabled Members		Income Bracket	
663	White	516	1 bed	82	Elderly/Non-Disabled	24	Low Income
527	Black	383	2 bed	491	Non-Elderly/Disabled	194	Very Low Income
53	Hispanic	233	3 bed	245	Elderly/Disabled	963	Extremely Low Income
3	American Indian	58	4 bed			8	Over 80% Income
1	Asian	3	5 bed				
		1	8 bed				

The characteristics of the families to participate in the FSS program are drawn from the demographics of current FSS participants (August 2022).

Race and Ethnicity		Voucher Sizes		Elderly/Disabled Members		Income Bracket	
5	White	1	1 bed	0	Elderly/Non-Disabled	0	Low Income
15	Black	8	2 bed	0	Non-Elderly/Disabled	4	Very Low Income
0	Hispanic	7	3 bed	0	Elderly/Disabled	16	Extremely Low Income
0	American Indian	4	4 bed			0	Over 80% Income
0	Asian						

The supportive service needs of families expected to be served include education and training, accelerated skills instruction, job placement, job retention, mentoring, homeownership counseling, financial coaching, and assistance paying for childcare and transportation.

Estimate of Participating Families

The FSS Program at Lake MHA had an initial mandatory size of 130 slots. Mandatory slots are reduced as participants successfully complete the Program. At this time, Lake MHA has had 161 FSS graduates since its inception.

Based on the demographics listed above and the composition of the waiting list, Lake MHA estimates that most Lake MHA-assisted families could be reasonably expected to receive supportive services and benefit from the FSS Program. Lake County has a diverse number of supportive services available to families. Lake MHA’s full-time FSS Coordinator will serve at least 25 participants and will strive to serve 50 families.

Eligible Families from Other Self-Sufficiency Programs

If applicable, the families by program type, who are participating in Operation Bootstrap, Project Self-Sufficiency, or any other local self-sufficiency program, are expected to agree to execute an FSS contract of participation.

Incentives to Encourage Participation

Case Management

An incentive to families participating in the FSS Program is the case management support provided by Lake MHA's FSS Coordinator. The FSS Coordinator will help FSS families gain the skills, training, and education to become financially independent through goal setting and coaching on an individualized basis. The FSS Coordinator will also be able to provide information on and referrals to local services.

Escrow Accounts

Another incentive to families participating in the FSS Program is the ability to earn a tax-free escrow account, created in accordance with the requirements set forth in 24 CFR § 984.305. When participating families experience an increase in rent due to an increase in household earned income, an escrow credit is calculated using the HUD-52652 form. The escrow amount is credited in an account in accordance with HUD requirements. Generally, when a participant's rent increases as a result of an increase in earned income, the difference (as compared to the original earned income amount in the CoP) is credited to the escrow account. Escrow credits are calculated by the FSS Coordinator at every interim and annual examination for the family. Written notice of changes to monthly escrow credits are provided to the family and an annual statement of the account balance and interest earned is provided at the end of each fiscal year. In the event of a rounding issue between the HUD form-52652 and agency software, a manually completed HUD form-52652 will be used as the correct escrow amount for the family and documented in the file. FSS families who are not low-income (families whose adjusted annual income exceeds 80% of the area median income) are not entitled to any FSS credit.

Interim Disbursements

Lake MHA may allow for a portion of the escrow account funds to be disbursed to a family when it is determined by Lake MHA that the FSS family has fulfilled certain interim goals established in the CoP and the FSS family needs a portion of the FSS escrow account funds for purposes consistent with or in support of the CoP. The Head of the FSS family must make a request for an interim disbursement in writing. Interim disbursements may only be made during the contract period and for contract related expenses. The following requests may be considered contract related expenses:

1. Emergency car repair or purchase – when transportation is needed for employment or education. Generally, two estimates will be requested for vehicle repairs unless the car is immobile.
2. Costs associated with obtaining a valid driver's license.
3. Educational costs to improve employability.
4. Credit repair/paying old debt, excluding overdue rent and/or utilities, or regular monthly expenses.
5. Business start-up expenses.
6. Other circumstances that assist in ITSP goal actualization, as determined on a case-by-case basis and approved by the FSS Coordinator, HCV Program Manager, and Chief Executive Officer.

For interim disbursements, a maximum of 50% of the escrow account may be withdrawn at one time per the approval of the FSS Coordinator, HCV Program Manager, and the Chief Executive Officer. No more than three interim disbursements shall be permitted for any participant during their contract term. The escrow money shall be made payable to the agency providing the service and/or goods, and not the FSS participant, unless the agency is unwilling to accept payment directly from Lake MHA. In those circumstances, at Lake MHA's discretion, the money may be paid to the participant. When an interim disbursement is paid directly to the participant, Lake MHA will request documentation and/or receipts that the money was used as approved. Interim disbursements will not be approved if the family is not current with rent payments. Additionally, unless the interim disbursement was made based on fraudulent information from the family, the family is not required to repay such interim disbursements, even if the family does not complete the CoP.

Final Disbursements

The escrow account will be paid out to the head of the FSS family when the following has occurred:

1. Graduation - The family has met all obligations under CoP, the contract is considered complete (whether at the expiration of the contract term or prior to expiration of the contract term), and the family is in compliance with the terms and conditions of the HCV Program regulations.
2. Termination with Escrow Disbursement - The CoP is terminated and one of the following HUD-established good cause circumstances exists:
 - a. Services that Lake MHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable.
 - b. The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless Lake MHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
 - c. An FSS family in good standing¹ moves outside the jurisdiction of Lake MHA, in accordance with portability requirements, for good cause and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible. Good cause circumstances are subject to verification. "Good cause" in this circumstance will mean:
 - (i) Moving to a different jurisdiction for the purposes of employment, education/training, or housing circumstances out the family's control

Should the FSS family owe money to Lake MHA, the family's escrow will be reduced by that amount before prorating the interest income earned and making the final disbursement. The escrow account will be paid out within 30 days after the effective date of graduation or termination of the CoP, unless there is an extenuating circumstance that requires additional evaluation to determine contract completion, including investigating allegations of HCV Program violations. Delays in disbursing /forfeiting escrow will be documented in the FSS family file. The interest for the escrow account will stop on the date the family graduated.

¹ In accordance with 24 CFR § 984.103, an FSS family is considered to be in good standing when the family is in compliance with their FSS CoP, has satisfied or is current on any debts owed to Lake MHA, and is in compliance with the regulations of the HCV Program.

Escrow Forfeiture

A participating family will forfeit their escrow account funds when:

1. The CoP is terminated by mutual consent of the parties, failure of the FSS family to meet its obligations of the CoP without good cause, withdrawal from the program, or termination from the HCV Program.
2. The CoP is completed by the FSS family, but the family is receiving welfare assistance at the time the CoP term expires, including any approved extension.

Any forfeited escrow funds will be used for the benefit of FSS participants in good standing. Specifically, the funds will be used for the following eligible activities as determined by the FSS Coordinator, HCV Program Manager, and Chief Executive Officer, depending on the needs of the FSS participants and the amount of escrow available:

1. A class or training open to all FSS participants in good standing, coordinated by Lake MHA, and related to employment preparation and retention skills, financial management skills, or other subject relating to achieving obligations outlined in the CoP.
 - a. When it is determined that funds will be used for this purpose, a notice will be issued to all FSS participants in good standing explaining the availability of the class/training and how and by when a participant must respond to reserve a spot for the class.
2. For transportation, childcare, training, testing fees, employment preparation costs, or other costs relating to achieving obligations outlined in the CoP.
 - a. When it is determined that funds will be used for this purpose, a notice will be issued to all FSS participants in good standing explaining the ability to request up to a particular amount of funds to pay for costs related to achieving obligations outlined in the CoP. Requests must include the purpose for which funds will be used and amount requested. Requests with complete information will be approved on a first come, first served basis until the forfeited escrow funds set for this purpose have been used or unclaimed. Lake MHA will request documentation and/or receipts that the money was used as approved.
3. Training for the FSS Coordinator.

Outreach Efforts

Outreach will be ongoing at each new admission voucher briefing, as well as with each annual income reexamination. Posters, flyers, and brochures will be made available in the Lake MHA waiting room and interviewer rooms. Brochures will be sent to service agencies in Lake County with periodic updates. Periodically, mass mailings and distribution of materials to all eligible participants may occur at the discretion of the Chief Executive Officer or designee. Articles regarding FSS may be included in Lake MHA newsletters.

By notifying every HCV family, Lake MHA seeks to make this opportunity available to all persons, in accordance with Lake MHA's equal opportunity policy.

FSS Family Selection Procedures

FSS clients will be selected from interested, active HCV participants, subject to the selection requirements set forth in 24 CFR § 984.203. Families will always be selected in a nondiscriminatory manner without regard to race, ethnicity, religion, sex, family status, national origin, sexual orientation, or disability, in compliance with Title VI of the Civil Rights Act of 1964 as amended, Title VII of the Civil Rights Act of 1968 as amended, and Executive Order 11063.

Lake MHA will also make reasonable accommodations for persons with disabilities to allow client participation in the FSS Program. Should Lake MHA be unable to accommodate a client's request due to undue financial or administrative burdens or the request results in a fundamental alteration of the program, the client will be referred to other agencies that may be able to better assist the client.

The FSS Program will provide all FSS applicants and participants information on fair housing issues. Fair Housing brochures are in the Lake MHA lobby and accessible to all participants of the FSS Program and future applicants. Information on fair housing issues is included in the intake materials provided to all applicants of the FSS Program. The FSS Coordinator will make referrals to fair housing agencies and other agencies that provide advocacy for individuals with disabilities, as needed. The FSS Coordinator will make any referrals needed to ensure that an FSS applicant or participant is able to file a complaint on fair housing issues.

FSS Waiting List

Should it become necessary due to the volume of applicants and/or the current program size being filled, Lake MHA will maintain an FSS waiting list. Lake MHA will give a selection preference for up to ten percent of Lake MHA's FSS Program slots (five FSS slots) to any eligible participant who is porting into Lake MHA from another jurisdiction and is actively participating in the FSS program at the initial Housing Authority (has an active FSS CoP). The FSS Coordinator will contact the initial Housing Authority's FSS program coordinator to ensure that the client is actively participating in the program. A porting family with an active FSS CoP may fill the other FSS Program slots when selected from the waiting list based on the date and time of their application. If all FSS slots are full at the time an incoming portable family with an active FSS CoP expresses interest in utilizing the port option, the FSS Coordinator will contact the initial Housing Authority's FSS program coordinator and the porting family to discuss the benefits and disadvantages of porting and the options for placement on Lake MHA's waiting list, continuing in the initial Housing Authority's FSS program, or completing or terminating their CoP prior to porting to Lake MHA.

Any FSS applicants not selected via the selection preference for incoming portable families with an active FSS CoP will be selected for the FSS Program on a first come, first serve basis, based on the date and time of their application.

FSS Program Intake

Once an application for the FSS Program has been received, the following actions are taken:

1. The family's application will be date stamped when received by the Lake MHA office.
2. The application is entered into the FSS waiting list according to the date stamp and given a waiting list number.
3. The FSS Coordinator will ensure the family is a part of the HCV Program before entering them into the FSS waiting list.
 - a) If the family is not currently part of the HCV Program, the family will be sent a letter explaining they are not eligible for the program.
 - b) If the family is a pending New Admission to the HCV Program, the application will be placed on hold until such time that their unit is approved and they are leased up and receiving housing assistance.
 - c) Any person who previously participated in the FSS Program at Lake MHA, whether the participant graduated or exited without graduating, will not be eligible for future FSS participation and will have their application withdrawn by written notification.
 - d) An applicant with an outstanding debt owed to Lake MHA will be permitted to participate in the FSS Program, provided they are in full compliance with the terms of their repayment agreement.
4. Prior to scheduling the family for FSS intake appointments, the following actions are taken:
 - a) The Coordinator will check to ensure the family is still on the HCV Program.
 - b) The Coordinator will check to see if the family is under termination. If the family is under termination, the application will be placed on hold until the informal hearing results are known.
 - c) If the family is no longer participating in the HCV Program, the family will be sent a letter informing them they are not eligible and their name will be removed from the waiting list.

Screening for Motivation

The FSS enrollment process includes two intake appointments between the FSS Coordinator and the applicant. When intake appointments are scheduled, the following actions are taken:

1. The FSS Coordinator will send a letter scheduling the applicant for two intake appointments. A personal self-assessment form, verification information form, and FSS Program orientation materials will be sent with the appointment letter. It is requested that the applicant return the completed forms for review at the first intake appointment.
2. Should the applicant fail to attend a scheduled intake appointment without a prior request to reschedule, the FSS Coordinator will attempt to reschedule the missed appointment. Failure to attend the rescheduled appointment without prior notice will result in the FSS application being withdrawn.
3. The FSS Coordinator will conduct a Needs Assessment to identify the strengths and needs of the family, to determine the appropriateness of the program to the applicant, and to screen for motivation. The applicant will be given two pre-selection tasks to complete prior to the second intake appointment. All applicants are given the same motivational tasks – a) to complete a Personal Goal Setting Worksheet within 7 days of the first intake appointment and, (b) provide a resume at their second intake appointment. Lake MHA screens motivation by completion of these tasks by the assigned due date.
4. If the applicant has not completed the tasks due to extenuating circumstances, and has notified the FSS Coordinator, the FSS Coordinator may request the applicant to provide verification that pre-selection tasks were not completed due to personal or dependent medical situations, lack of available service necessary to complete tasks, or inability to complete tasks due to a disability. The FSS Coordinator may provide additional time for completion due to the extenuating circumstances, generally not to exceed an additional 7 days.
5. At the second meeting, if the applicant has successfully completed the pre-selection tasks, the CoP and ITSP are finalized and signed and the applicant signs an Agreement to Succeed. If the applicant does not wish to participate in the FSS Program or fails to complete tasks in accordance with the steps outlined above, then the applicant's FSS file will be closed and the applicant notified in writing that their application has been withdrawn.

Case Management Activities and Supportive Services

Contract of Participation (CoP) and Individual Training and Services Plan (ITSP)

Each family participating in FSS must execute a CoP with Lake MHA. Only the head of the FSS family signs the CoP, but other family members may have Individual Training and Services Plans (ITSP) by mutual agreement of the participating family and the FSS Coordinator. The head of the FSS family can be any adult member of the household who is chosen by the family to act as the head of the FSS family. The head of the FSS family does not have to be the head of household for the HCV Program. The household will be required to sign a form designating which adult member of the household will act as the head of the FSS family. The household may agree to change the adult designated as the head of the FSS family during the term of CoP by signing a new designation form, which will then be reflected in the CoP. In this circumstance, the CoP start and end dates and baseline will not change.

Similarly, if the head of the FSS family ceases to reside with other family members in the assisted unit, the remaining members of the FSS family, after consultation with Lake MHA, will have the right to designate another family member as head of the FSS family to receive the funds in accordance with the regulations by signing a new designation form. This change will need to be reflected in the CoP and the FSS Coordinator may reassess the family's needs.

The CoP describes the responsibilities for the participant family including mandatory goals, ITSPs, and the circumstances resulting in termination from the program. There are two mandatory goals that are part of the CoP. First, the head of the FSS family is required to seek and maintain suitable employment. Lake MHA generally defines "suitable employment" as full-time employment, employment averaging 30 hours per week, or part-time employment with part-time enrollment in a school/training program. Employment less than 30 hours a week may be considered suitable for some individuals. Ultimately, the determination of "suitable employment" will be made by agreement between Lake MHA and the affected FSS participant based on the participant's skills, education, job training, and receipt of other benefits, and the available job opportunities in the jurisdiction.

Second, all family members must be free from cash welfare assistance at the time of graduation. Any other goals established will be established by mutual agreement of the FSS Coordinator and the participant in the participant's ITSP.

An ITSP for each participant, developed based on the Needs Assessment, Personal Self-Assessment, and Personal Goal Setting Worksheet, will be attached to the participant family's CoP. The goals established should be realistic and may vary greatly between individuals due to the differing needs of participants. Participants will be assessed on a case-by-case basis. Modifications may be made to the ITSP as needs change and if goals are no longer appropriate or obtainable. Existing goals may be changed or removed and new goals may be added. There is no limit on the time or number of modifications that can be made to an ITSP; however, modifications must be made in writing, by mutual agreement between the FSS Coordinator and the FSS participant.

Each FSS family is required to fulfill CoP obligations no later than five years after the first reexamination of income (interim or annual reexamination of income) after the execution date of the CoP. When an expiration date is added to the CoP both Lake MHA and the head of the FSS family must sign an amendment that states the new date.

The CoP may be extended for a period of up to two years for good cause. Requests for extensions must be made in writing by the head of the FSS family, prior to the CoP's expiration date and contain a description of the need for extension. "Good cause" may include:

1. Circumstances beyond the family's control such as death in the family, serious illness, or medical emergency;
2. Involuntary loss of employment including lay off, national or natural disasters, strikes, closing of business, or serious illness of a family member. Termination for nonperformance is not grounds for an extension.
3. The active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension, such as completion of a college degree during which the participant is unemployed or under-employed or credit repair toward being homeownership ready.
4. The FSS family will not be free from cash welfare at the end of the CoP term, but is likely to become free from cash welfare during the extension.

Case Management

The role of the FSS Coordinator includes advocating for the participant with service providers and being sensitive to the concerns and needs of low-income families. The FSS Coordinator uses a variety of means to maintain contact with FSS participants. That contact may include telephone calls, emails, letters, and face to face contact.

FSS participants are required to maintain contact with their FSS Coordinator. Repeated failure to respond to the FSS Coordinator will be grounds for termination from the FSS Program. All participants are requested to contact their FSS Coordinator on a regular basis to provide updates on progress in completing goals and meeting needs. Participants who consistently fail to maintain contact shall be notified by mail of failure to do so and a request will be made for the participant to contact the FSS Coordinator immediately. Failure to respond to three contacts (of any combination of telephone calls and notices) may result in proposal for termination from the FSS Program.

The FSS Coordinator will meet at least annually with each participating family to review the ITSPs and goal progress, and make recommendations for modifications in the ITSPs or to service providers. Interim appointments will be set up to discuss emergent needs of participants as they occur. Clients will receive additional referrals to supportive services as needed.

The FSS Coordinator will track the progress of participants. Goal progress and completion will be documented and maintained in the FSS family's file. Acceptable documentation of goal progress and completion may include, but is not limited to, paystubs from an employer, a letter from an employer, a service provider, or a college, university, or training program documenting start and end date, enrollment, completion, etc. A self-certification may be used when third-party documentation is unavailable.

Participants of FSS will be referred to an array of supportive services, if desired and based on identified needs of the family. These needs will be identified through the completion of the Needs Assessment and through ongoing contact with the participating family.

Supportive Services: Community Resources and Partnerships

Lake MHA meets regularly with the Program Coordinating Committee (PCC) in an effort to secure resources for participating families. All FSS participants will be provided information listing local resources, including addresses and telephone numbers. Information regarding service providers will be made available to all participants at appointments, by telephone, e-mail, or other written request. Lake MHA maintains a partnership with many service providers, including:

- Ohio Means Jobs-Lake County (formerly Lake1Stop)
- Lakeland Community College
- ABLE
- Salvation Army
- Job & Family Services (JFS)
- Lifeline
- Laketran
- Key Bank
- Project Hope
- Forbes House
- Family Planning
- Extended Housing
- Goodwill Industries
- OSU Extension Office

FSS Coordinators shall, upon request, use available resources to procure any information regarding assistance that clients may need in order to complete FSS goals. FSS Coordinators will maintain effective relationships with representatives from the service providers listed above as well as any other agency or program which may provide assistance to clients in completing goals.

When available, FSS Coordinators may offer resources and services, including: (1) job search materials and notices; (2) resume development and evaluation; (3) credit report evaluation; (4) homeownership opportunities; and (5) financial literacy education information.

Active FSS participants who are transitioning into the Homeownership Program will receive a preference on the Homeownership wait list.

Method for Identification for Family Support Needs

Supportive services needs are identified by completion of the Needs Assessment with the FSS coordinator before completion of the initial Individual Training and Services Plan (ITSP), which occurs prior to signing the CoP. After enrollment in the FSS program, a Needs Assessment may also be used to modify the ITSP and supportive services, if requested by the family.

Additionally, Lake MHA will review the FSS family and HCV family demographics at least every two years to determine if the needs of the community have changed and if any adjustment to services is needed.

Completion of the CoP

The CoP will be considered complete and the final escrow disbursed when the FSS family has fulfilled all their obligations under the CoP, on or before the expiration date of the contract (including extensions) and they are in compliance with their family obligations under the HCV Program. This means the family has provided documentation that they have completed their ITSP goals satisfactorily and all family members are free from cash welfare assistance.

Transitional Supportive Services - After graduation and at the request of the former head of the FSS family, Lake MHA may provide the former FSS family appropriate coordination of FSS supportive services which are needed to become self-sufficient, so long as the family is still a participant in the HCV Program.

Termination of the CoP

The CoP will be terminated prior to the expiration date, and any escrow forfeited, if the family's housing assistance through the HCV Program is terminated in accordance with HUD requirements.

The CoP may be terminated prior to the expiration date, and any escrow forfeited, for any of the following reason:

1. Mutual consent of the participant and FSS Coordinator
2. Failure of the family to meet contract obligations without good cause including but not limited to:
 - a. failure to maintain contact;
 - b. chronically not accomplishing ITSP goals;
 - c. repeated failure to attend appointments (more than two consecutive);
 - d. repeated failure to return requested documentation; or
 - e. moving out of the jurisdiction without a determination that there is good cause to terminate the CoP with escrow disbursement
4. Family withdrawal from the program

If Lake MHA determines that the FSS family has failed to comply with the requirement of the CoP, without good cause, and that such failure will result in the withholding of coordination of supportive services, forfeiture of escrow, or termination of the family's participation in the FSS Program, the family will be afforded a notice of termination with information on the right to an informal hearing. All hearings shall be conducted in compliance with Lake MHA's Administrative Plan. Lake MHA will not terminate a participant's HCV assistance based solely on termination from the FSS Program.

The CoP may also be terminated with an escrow disbursement when Lake MHA has determined and documented that the circumstances described in the final disbursement section above exist.

Assurance of Non-Interference

An individual or family that chooses not to participate in or is terminated from the FSS Program will not be discriminated against in any way including denial, delay, or termination from Lake MHA's HCV Program. Termination from the FSS Program will not be a means of termination from Lake MHA's HCV Program.

Timetable for Implementation

Lake MHA filled its mandatory slots and met all previous timetable deadlines and requirements for program implementation. Lake MHA will continue to administer a voluntary program. The FSS Coordinator will conduct outreach activities and work with community services providers and the PCC to ensure the minimum program size is met.

Certification of Coordination

Lake MHA entered into a Memorandum of Understanding (MOU) with the Lake County Department of Jobs and Family Services (JFS), effective July 1, 2022. Lake MHA agrees to continue as a party to this MOU and enter into renewal MOUs for as long as Lake MHA participates as a partner in the local workforce development system. Both Lake MHA and JFS will work together to target services and resources for families, and coordinate and streamline administrative functions to ensure the efficient delivery of services to families.

Lake MHA certifies that the FSS Program has developed its services and activities in coordination with JFS and the other service providers listed above. The implementation of program activities and services will continue to be coordinated in a manner that avoids duplication of activities and services.