

# FSS ACTION PLAN

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# First Things

- Yes, this webinar will be recorded and the PPTs made available.
- SIGN UP TO THE FSS MAILING LIST
  - [Sign up for the HUD FSS Listserve](#)
  - <https://public.govdelivery.com/accounts/USHUDPIH/signup/30989>
- The answer to “where?” is almost always [FSS Resources Page](#)
  - (google HUD FSS and you’ll get there)
- FAQ Section on FSS Action Plans – see most recent FAQ (on resources page)
- Questions? [FSS@hud.gov](mailto:FSS@hud.gov)

# Why?

- Because you have to!
- Because the FSS Action Plan is where you codify YOUR policies and procedures.
  - FSS leaves A LOT up to the discretion of the local program.
  - A large portion of the questions to the FSS mailbox are answered with, “what’s in your FSS Action Plan?”
  - YOU need to know what’s statute, what’s regulation, and what’s up to your local policy.

# Critical Templates



[FSS Action Plan Checklist](#) - Required for Submission of Plans



[Sample FSS Action Plan](#)

# SAMHSA'S 6 PRINCIPLES

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## TRAUMA-INFORMED APPROACH



### SAFETY

Prevents violence across the lifespan and creates safe physical environments.

### TRUSTWORTHINESS

Fosters positive relationships among residents, City Hall, police, schools and others.

### EMPOWERMENT

Ensures opportunities for growth are available for all.

### COLLABORATION

Promotes involvement of residents and partnership among agencies.

### PEER SUPPORT

Engages residents to work together on issues of common concern.

### HISTORY, GENDER, CULTURE

Values and supports history, culture and diversity.

# FSS Regulatory Action Plan Requirements

- Family Demographics
- Estimate of participating families (program size/number of FSS slots)
- Eligible families from other self-sufficiency program
- FSS family selection procedures
- Incentives to encourage participation
- Outreach efforts
- FSS activities and supportive services
- Method for identification of family support needs
- Program termination; withholding of services; and available grievance procedures
- Assurances of non-interference with the rights of non-participating families
- Timetable for program implementation
- Certification of coordination

# Family Demographics

## **What are the characteristics of the families you expect to serve in the FSS Program?**

- Which Housing Assistance Program(s)? (PH, HCV, PBV, PBRA etc.)
  - Employment status (will you target unemployed families?)
  - Current income levels (will you target under-employed? Families doing well and possibly ready for the next step?)
  - Family size
  - Age (can you catch families with kids before they turn 18?)
  - Disability status of HoH
  - Race/ethnic data
- This information will help you target your recruitment of participants and partners

# Demographics?

- All of this is in PIC/TRACS
- The Resident Characteristics Report (RCR) in PIC is one source of demographic data. There's no report that's going to spit out a chart like the one in the Sample Action Plan. You may have to do some math. Or you may decide to include other types of demographics. The sample is a SAMPLE.
- REMEMBER – The demographics are not for your existing FSS program, but for the population of potential participants



# Supportive Service Needs of Families Expected to be Served

What do you know? How could you find out?

- Training in basic skills and executive function
- Employment training, including sectoral training and contextualized and/or accelerated basic skills instruction
- Job placement assistance
- GED preparation
- Assistance paying for child care
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings

# Estimate of Participating Families

An estimate of the number of eligible families who can reasonably be expected to receive supportive services based on available resources.

- Please note that this is different from the minimum number of families that a PHA is funded to serve.
- **PHAs ONLY** - This number must be at least the minimum program size required for your agency, if applicable. (If you don't know if you still have a Mandatory Minimum Program or don't know how many slots you have, please consult your field office or include the best numbers you have.)

Original Number of Participants Mandated	FSS Graduates	Current Number of Participants Mandated

# Other Self-Sufficiency Programs

- If families from another self-sufficiency program are expected to enroll in the FSS program, the number of those families must be also estimated.
  - ROSS, Jobs Plus, Choice Neighborhoods
  - VASH, FUP/FYI/FSHO

# FSS Family Selection Procedures (24 CFR 984.303)

- (1) The percentage of FSS slots, not to exceed fifty (50) percent of the total number of FSS slots, 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.
- (b) Selection among families with preference. The PHA may use either of the following to select among applicants on the FSS waiting list with the same preference status:
  - (1) Date and time of application to the FSS program; or,
  - (2) A drawing or other random choice technique.
- (c) FSS selection without preference. For those FSS slots for which a selection preference is not applicable, 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 the PHA must be described in the PHA Action Plan.

# Will you offer a preference to...

- porting-in families already on FSS?
- FUP-Y/FYI voucher holders who want to take advantage of FSHO?
- Families that are already engaged in a particular service or program?

# Motivation as a Selection Factor

- (d) Motivation as a selection factor.
- (1) General. A PHA may screen families for interest, and motivation to participate in the FSS program, provided that the factors utilized by the PHA are those which solely measure the family's interest, and motivation to participate in the FSS program.
- (2) Permissible motivational screening factors. Permitted motivational factors include requiring attendance at FSS orientation sessions or preselection interviews and assigning certain tasks which indicate the family's willingness to undertake the obligations which may be imposed by the FSS CoP. Any tasks assigned shall be those which may be readily accomplishable by the family, based on the family members' educational level, capabilities, and disabilities, if any. Reasonable accommodations and modifications must be made for individuals with disabilities, including, e.g., mobility, manual, sensory, speech, mental, intellectual, or developmental disabilities;
- (3) *Prohibited motivational screening factors.* 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 the exclusion, application of different eligibility requirements, or other discriminatory treatment or effect on the basis of race, color, national origin, sex (including actual or perceived gender identity and sexual orientation), religion, familial status or disability.

# Incentives to encourage participation

- The incentives plan shall provide for the establishment of the FSS escrow account in accordance with the requirements set forth in § 984.305, and other incentives, if any.

# Outreach Efforts

## **Do you have a clear and well articulated outreach plan?**

- You plan should include a description of the planned notification and outreach efforts by the PHA or owner to recruit FSS participants from among eligible families and to provide FSS information to minority and non-minority families.
- How will you ensure that all types of families receive the information equally?





Create and implement an outreach/marketing plan?

When/where/how do you recruit?



Create a “with” or an “in-group”?



Capitalize on graduates as potential “thought leaders” or mentors



Convene a focus group or leadership circle of current or former or potential participants



Use social media – for outreach and/or for communication with participants - CAREFULLY

## Outreach/Engagement

# Relational Organizing

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## AKA – It's ALL About Relationships

- ✓ Stay away from Transactional
- ✓ What's your story?
  - ✓ Self, Us and Now
- ✓ Write a Script. Test it out. Re-write it.
- ✓ Have an Ask!
- ✓ Practice!
- ✓ LISTEN 70/30
- ✓ Ask Questions
- ✓ Don't knock like a cop!
- ✓ Leave Something Behind
- ✓ Follow up
- ✓ Every encounter is an opportunity for connection

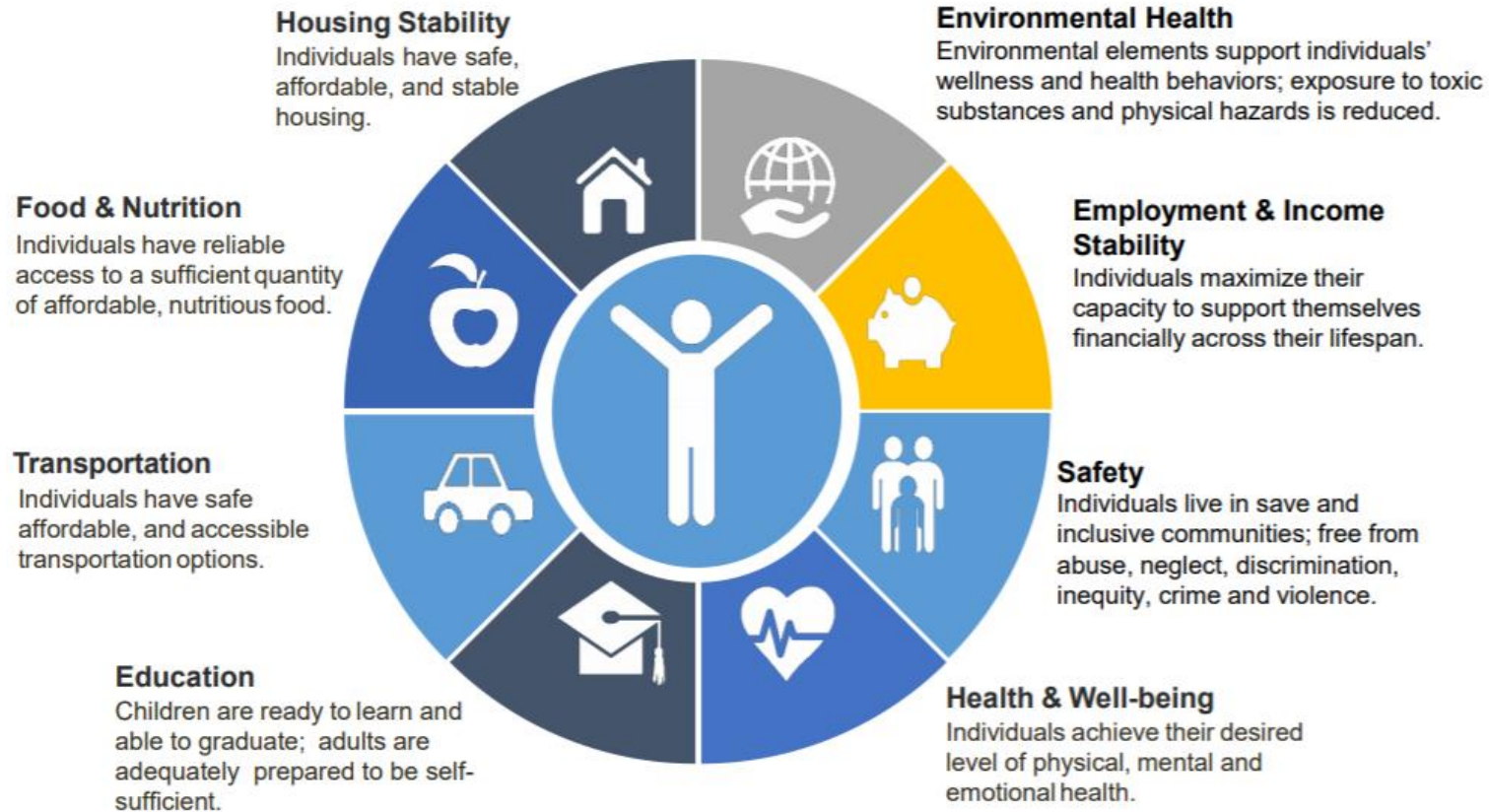
# FSS Activities & Supportive Services

## Creating and Maintaining Strong Community Based Partnerships

- What activities and supportive services are in place to FSS families by both public and private providers and identification of the public and private resources which are expected to provide the supportive services.
- Every FSS program should have a Partner/Service matrix (best practice)

Supportive Service Category	Specific Service	Source/Partner
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# Start by viewing all work through the Social Determinants of Health & Wellness Lens to Increased Self-Sufficiency & Stability



# Method to Identify Family Support Needs

- How will your FSS program identify the service needs of families?
- Once needs are identified, what are the service delivery systems in place to support families?

# Needs Assessment and Individual Services Plan –

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## Needs Assessment

- Are you using a standard tool or did you create one? Pros/cons?
- Does it ask the “right” questions for your population?
- How have you tweaked it since you started using it?

## How do you decide what comes first in the plan?

- (e.g. substance abuse, domestic violence, low education, no work history... what comes first?)
- Are you able to have a “long view”?
- Do you have a standard triage of needs?

## Be Strengths-Based

- What’s good? What’s working? What survival skills and informal systems have gotten them this far?

# Program Compliance

- Program Termination
  - Are the requirements reasonable and actually help families move toward their goals
  - Meetings for the sake of meeting?
  - When/how often will you review?
  - What's your process for notification
    - Multiple times, multiple ways
  - Does termination require the approval of more than one person?
  - How do your re-enrollment policies dovetail with termination policies?
- Grievance Procedures
  - Can point to the grievance procedures for your rental assistance programs

# Program Assurances

- Action Plan must provide assurance that a family's election not to participate in the FSS program will not affect the family's participation in the rental assistance program.



# Timetable for Program Implementation

- A schedule for program implementation and for filling all FSS slots with eligible FSS families.
- For Programs with Mandatory slots – how will that mandate be met?
- For NEW programs – how will the minimum number of participants (if funded) be enrolled in the first year?

# Certification of Coordination

- FSS program has been coordinated with programs under title I of the Workforce Innovation and Opportunity Act 29 U.S.C. §§ 3111 et seq.; and
  - other relevant employment, child care, transportation, training, education, and financial empowerment programs in the area,
  - and that implementation will continue to be coordinated, in order to avoid duplication of services and activities;
- This section might also include policies on the Program Coordinating Committee
  - Who?
  - When?
  - How often? (best practice – at least quarterly)

# New FSS Action Plan requirements

- (13) Optional additional information. Such other information that would help HUD determine the soundness of the proposed FSS program. This may include

# ITSP Goal Modification

- (i) Policies related to the modification of goals in the ITSP
  - Best Practice – flexibility... all the way to the end.

# Extensions

## (ii) The circumstances in which an extension of the Contract of Participation may be granted;

- (i) Circumstances beyond the control of the FSS family, as determined by the [organization], such as a serious illness or involuntary loss of employment;
  - (ii) Active pursuit of a current or additional goal that will result in furtherance of self-sufficiency during the period of the extension (e.g. completion of a college degree during which the participant is unemployed or under-employed, credit repair towards being homeownership ready, etc.) as determined by the [organization] or
  - (iii) Any other circumstances that the [organization] determines warrants an extension,
- Who requests?
  - Who decides?
  - When?

# Interim Distribution of Escrow

(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any);

- Best Practice – Allow!
- Who requests?
- Who Decides?
  
- What's allowable?
  - How much?
  - To whom?

- Limitations?

- Only up to a dollar amount
- Only up to a % of what's in the account
- Only up to a % of total cost of request
- Engaged in financial empowerment activities
  
- Pre-requisites
  - Not available from a partner
  - 3 bids

# Uses of Forfeited Escrow

(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing;

- Remember, the goal is that this pot will be empty
- Who decides?
- What's eligible?

# Re-Enrollment

- (v) Policies regarding the re-enrollment of previous FSS participants, including
  - graduates
  - those who exited the program on their own accord
  - Asked to leave the program
  - Escrowed
  - Didn't escrow;
- Depends on local circumstances
- May impose other requirements
  - After a certain period of time?
  - With a significant life event?
  - Different goals?



# Documentation

(vi) Policies on requirements for documentation for goal completion;

- Auditor could confirm that a goal was achieved.
- What needs to be in the file?
- Paper or electronic is fine.

# Documentation of “Head of FSS Household”

- (vii) Policies on documentation of the household’s designation of the “Head of FSS Household;” and
- Requirement is “as designated by the family”

# PHAs only - Selection Preference for Ports

(viii) Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference).

- This may already be in your selection preference section

# What's Next?



FSS Action Plan AND Checklist emailed to your Field Office Grant Manager (PHAs) or PBRA Grant Specialist (PBRA)



Email as one or two documents... but please make them searchable! Not a scanned PDF!



Due April 28, 2023



Once Action Plan is approved, start enrolling

# FAQ

## Q. Does every PHA or Property need a separate Action Plan?

A. The reason for the separate FSS Action Plans is that each PHA/property may have different demographics and mandatory program sizes remaining. So, basically, do one plan and copy - in each separate one, answer the questions that pertain to the agency separately, but all of the policies the same. Indicate at the top that this is a joint FSS program with [list the other properties or PHAs] so the reviewer can review them all together.

## Q. Can a PHA have a combined plan for Public Housing and HCV?

A. YES! The PH and HCV programs have been combined since FY14. PHAs SHOULD have ONE plan that covers PH and HCV. See 24 CFR 984.201(f).

## Q. How do I use the Sample FSS Action Plan?

A. There are instructions on p.2. Here's the really important part

- **Completing Your Action Plan.** To use this Template as your Action Plan, select the policy options that match your policy choices in the right-hand column and delete any options that do not apply to your program. Delete any instructions or other text in the right-hand column that are not necessary for understanding the document. The remaining text in the right-hand column will constitute your Action Plan and may be submitted to HUD for approval. There is no need to delete the instructions in the left-hand column before submitting.

# FAQ

**Q. If I submit my FSS Action Plan and it's approved and then I want to change it, can I?**

A. Yes. You are always allowed to modify your FSS Action Plan. You will need to re-submit it. Revisions should be submitted to your PIH Field Office or your Multifamily Grant Specialist.

**QUESTIONS**

The image features the word "QUESTIONS" in a large, bold, white, sans-serif font with a slight 3D effect. The text is centered and surrounded by a vibrant, multi-colored collage of question marks and geometric shapes. The shapes include circles, squares, and rectangles in various colors such as blue, yellow, orange, red, green, purple, and pink. The question marks are also in various colors and sizes, some appearing to be floating or scattered around the main text. The entire graphic is set against a plain white background and is enclosed within a thick, solid blue border.