

PHA Name : Newnan

PHA Code : GA095

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of Newnan participates in the MTW Demonstration due to our commitment to improve resident outcomes, increase program cost-effectiveness, and through the development of a rent reform and incentive program. The proposed program will encourage and support program participants' self-sufficiency, while increasing landlord involvement; and reducing administrative burden and costs. The Housing Authority of Newnan (HAN) has adopted the following statutory objectives: Reduce cost and achieve greater cost-effectiveness in federal expenditures; give incentives to families with children where the head of household is working; is seeking work; or are preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and increase housing choices for eligible low-income families. HAN believes that Public Housing (PH) and Housing Choice Voucher (HCV) should be a steppingstone to self-sufficiency; clients who come in through the PH and HCV programs can use their housing assistance as a tool to become self-sufficient.

The following items are activities and/or proposed short-term and long-term goals of the Housing Authority of Newnan to further the MTW statutory objectives during the Fiscal Year of July 1, 2023 through June 30, 2024:

1. Administrative Efficiency and Cost Effectiveness:

A. MTW flexibilities will allow HAN to make simple changes to eliminate requirements that cause confusion amongst clients and increase the workload for HAN staff. In the agency's 2022 MTW supplement, HAN eliminated the utility reimbursement calculations for MTW PH and HCV participants. In addition to this activity, the 2023 supplement will include elimination the Earned Income Disallowance (EID). These calculations are burdensome to HAN staff because of the time and coordination efforts needed to process these deductions. HCV clients will know the exact amount of their rental assistance before they start looking for suitable housing. To save money and increase housing choices, HAN plans to apply for block grant PH and HCV funds. This will also help to improve program efficiency and effectiveness.

B. After implementation of our current Alternative Reexamination activity, our agency was able to evaluate challenges and barriers to implementation of the activity. These challenges were identified as rejection of 50058 submittals to PIC with future dates past 12 months of annual recertification date, and an increased in PIC fatal errors. As a solution to this barrier, HAN plans to modify its Alternative Reexamination Schedule for all PH and HCV clients. HAN will return to annual recertifications for all eligible PH and HCV households. Elderly/disabled households will continue to have the options to complete triennial recertifications from this provision and can complete an interim recertification at any time. Clients that believe they qualify for a hardship may request an interim recertification. Elderly/disabled household clients are not required to report increases/decreases in income between triennial recertifications; however, they must report all other household composition changes. This modification will allow us to achieve a more efficient use of our limited staff time and resources. We estimate that will eliminate between 10-12 weeks of staff time each year. Put in the context of our larger MTW goals, this will allow more staff time to devote to activities that better support our residents and address larger community needs. Our residents will benefit by not having to go through the process every year – it will save them time, stress and headaches.

2. Self Sufficiency Initiatives:

A. HAN will eliminate the Earned Income Disallowance (EID) for PH and HCV participants. This will increase operational efficiencies by reducing the time it takes to administratively process the EID. Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits. Families will begin to achieve self-sufficiency at a more rapid pace. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.

B. HAN will replace the Family Self-Sufficiency (FSS) escrow model with a Goal Rewards Model. In the proposed model, participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives can immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will receive the incentive immediately via disburse check at the time the goal is completed. At this time, increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program. HAN proposes modifying the FSS contract of participation to reflect the new Goal Rewards Model based on achievement of self-sufficiency activities. This involves modifying the following sections in the FSS Contract: FSS Escrow Account; Withdrawal of Funds from FSS Escrow Account; Loss of FSS Escrow Account; and HAN Responsibilities. Current FSS participants who are within 12 months of completion of FSS program will have the option to choose to remain on the current FSS Escrow Model or switch to the Goal Rewards Model. If an extension of the contract is needed to complete goals, the participants will be placed on the Goal Rewards Model All other FSS participants who are 12 months or more upon completion of FSS contract will be placed on the Goal Rewards Model and will be able to

benefit from immediate cash incentives upon completion of goals. If the PHA or owner determines that the FSS family has fulfilled unless the interim disbursement was made based on fraudulent information from the family, the family is not required to repay such interim disbursements if the family does not complete the COP. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.

C. HAN will implement a work requirement that will apply to all PH and HCV household members 19-61. Each family member ages 19-61 years of age is requires to be employed a minimum of 15 hours per week (30 hours per week minimum households with multiple eligible members) or meet a qualify work activity. This activity will move participant families toward self sufficiency and financial independence thereby breaking the cycle of poverty and dependence on subsidies. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Currently Implementing
f. Minimum Rent (HCV)	Currently Implementing
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Currently Implementing
n. Utility Reimbursements (HCV)	Currently Implementing
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Currently Implementing
s. Elimination of Deduction(s) (HCV)	Currently Implementing
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Plan to Implement in the Submission Year
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented

9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Plan to Implement in the Submission Year
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Plan to Implement in the Submission Year
e.PH Policies for Addressing Increases in Family Income (PH)	Plan to Implement in the Submission Year
e.HCV Policies for Addressing Increases in Family Income (HCV)	Plan to Implement in the Submission Year
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Plan to Implement in the Submission Year
b. Work Requirement (HCV)	Plan to Implement in the Submission Year
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Newnan Plans to Implement in the Submission Year or Is Currently Implementing

1.e. - Minimum Rent (PH)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative The HAN will continue increase the minimum rent for all clients (New Admission and Currently Assisted) during our first year of implementation. Our current minimum rent is \$50.00. All clients will have a minimum rent of \$130. This MTW activity was effective July 1, 2022. Rent Increases are being adjusted during the household annual recertification. This initiative will continue to promote self-sufficiency by encouraging heads-of household to work, while also promoting cost effectiveness by raising much-needed rental revenue. This revenue can be put back into the agency-allowing HAN to complete long-deferred maintenance projects and fund MTW projects. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.
Safe Harbors: i. Minimum rent must not exceed \$130 per month. ii. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. iii. HAN will conduct an impact analysis for this activity. iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.
Which of the MTW statutory objectives does this MTW activity serve? Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased revenue
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Other – another specifically defined target population or populations.
If Other Selected in Previous Question: Please describe this target population in the text box. This MTW activity will apply to all assisted families who can work; elderly and disabled families, as well as full-time students will be exempt.
Does the MTW activity apply to all public housing developments? The MTW activity applies to all developments
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This activity has been implemented successfully with 0 hardship requests submitted at this time.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

1.e. - Minimum Rent (PH); 1.f. - Minimum Rent (HCV); 1.r. - Elimination of Deduction(s) (PH); 1.s. - Elimination of Deduction(s) (HCV); 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV); 12.a. - Work Requirement (PH); 12.b. - Work Requirement (HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How much is the minimum rent or minimum Total Tenant Payment (TTP)?

\$130

1.f. - Minimum Rent (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

The HAN will continue increase the minimum rent for all clients (New Admission and Currently Assisted) during our first year of implementation. Our current minimum rent is \$50.00. All clients will have a minimum rent of \$130. This MTW activity was effective July 1, 2022. Rent Increases are being adjusted during the household annual recertification. This initiative will continue to promote self-sufficiency by encouraging heads-of household to work, while also promoting cost effectiveness by raising much-needed rental revenue. This revenue can be put back into the agency-allowing HAN to complete long-deferred maintenance projects and fund MTW projects. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.

Safe Harbors:

- i. Minimum rent must not exceed \$130 per month.
- ii. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.
- iii. HAN will conduct an impact analysis for this activity.
- iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This activity has been implemented successfully with 0 hardship requests submitted at this time.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How much is the minimum rent or minimum Total Tenant Payment (TTP)?

\$130

1.m. - Utility Reimbursements (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will continue to eliminate Utility Reimbursements payments for all clients (New Admission and Currently Assisted) at all locations. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This activity has been implemented successfully with 0 hardship requests submitted at this time.. The only challenge presented are increase administration time to address software barriers that are corrected by manual data entry.

1.n. - Utility Reimbursements (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will eliminate Utility Reimbursements payments for all clients (New Admission and Currently Assisted) at all locations. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This activity has been implemented successfully with 0 hardship requests submitted at this time.. The only challenge presented are increase administration time to address software barriers that are corrected by manual data entry.

1.r. - Elimination of Deduction(s) (PH)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HAN will continue to establish a cap in the childcare deduction. This activity modifies the applicable rules and regulations necessary to limit the amount of childcare deduction that may be taken by all HAN clients. The activity allows HAN to place a cap on childcare deductions to match with the Georgia Childcare and Parent Services (GA CAPS) reimbursement amounts. Childcare deductions will not exceed GA CAPS reimbursement amounts and are reduced to categorical maximum amounts filtered by age. Hardship requests are addressed on a case-by-case basis in accordance with the Hardship Policy. Families continue to furnish proof of their out-of-pocket childcare expenses and HAN staff will simply verify the provided childcare costs are in-line with GA CAPS based on the child's age and service provider. HAN administrative staff will utilize the Georgia Childcare and Parent Services (GA CAPS) reimbursements rates as a reference guide to determined childcare deduction cap/limits. The reference guide is located at the following: <https://caps.decal.ga.gov/assets/downloads/CAPS/AppendixC-CAPS Reimbursement Rates.pdf>

Safe Harbors:

- i. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.
- ii. HAN will conduct an impact analysis for this activity.
- iii. iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Which deduction(s) will be eliminated, modified, or added?

Unreimbursed childcare costs

1.s. - Elimination of Deduction(s) (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will continue to establish a cap in the childcare deduction. This activity modifies the applicable rules and regulations necessary to limit the amount of childcare deduction that may be taken by all HAN clients. The activity allows HAN to place a cap on childcare deductions to match with the Georgia Childcare and Parent Services (GA CAPS) reimbursement amounts. Childcare deductions will not exceed GA CAPS reimbursement amounts and are reduced to categorical maximum amounts filtered by age. Hardship requests are addressed on a case-by-case basis in accordance with the Hardship Policy. Families continue to furnish proof of their out-of-pocket childcare expenses and HAN staff will simply verify the provided childcare costs are in-line with GA CAPS based on the child's age and service provider. HAN administrative staff will utilize the Georgia Childcare and Parent Services (GA CAPS) reimbursements rates as a reference guide to determined childcare deduction cap/limits. The reference guide is located at the following:
[https://caps.dec.state.ga.us/assets/downloads/CAPS/AppendixC-CAPS Reimbursement Rates.pdf](https://caps.dec.state.ga.us/assets/downloads/CAPS/AppendixC-CAPS_Reimbursement_Rates.pdf)

Safe Harbors:

- i. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.
- ii. HAN will conduct an impact analysis for this activity.
- iii. iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Which deduction(s) will be eliminated, modified, or added?

Unreimbursed childcare costs

1.v. - Alternative Income Inclusions/Exclusions (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW

activity contributes to a larger initiative

HAN will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID. Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits.

Safe Harbors:

i. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What inclusions or exclusions will be eliminated, modified, or added?

Earned Income Disallowance (EID)

1.w. - Alternative Income Inclusions/Exclusions (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HAN will eliminate the Earned Income Disregard. This will increase operational efficiencies by reducing the time it takes to administratively process the EID. Currently, the EID allows individuals who go from not working in the previous 12 months, to working, to gradually phase in the income counted toward their rental calculation over a period of 2 years. The EID is an opportunity for clients that gain earned income, that did not previously have earned income to experience the benefit of increased income without that income increase being utilized for rent immediately; however, due to cumbersome regulations, the cost to continue offering this exclusion far outweigh the benefits.

Safe Harbors:

i. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What inclusions or exclusions will be eliminated, modified, or added?

Earned Income Disallowance (EID)

3.a. - Alternative Reexamination Schedule for Households (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN plans to modify its Alternative Reexamination Schedule for all PH and HCV clients. HAN will return to annual recertifications for all eligible PH and HCV households. Elderly/disabled households will continue to have the options to complete triennial recertifications from this provision and can complete an interim recertification at any time. Clients that believe they qualify for a hardship may request an interim recertification. HAN will allow one interim decreased rent adjustment per annual without a hardship request. Any additional interim decrease rent adjustments will require a hardship request according to the guidelines of the hardship policy. Interim increased rent adjustments must be reported. However, rent increases will take place if total household income increase by 20% . No rent change will be adjusted if income income fall below 20%. Elderly/disabled household clients are not required to report increases/decreases in income between triennial recertifications; however, they must report all other household composition changes. This modification will allow us to achieve a more efficient use of our limited staff time and resources. We estimate that will eliminate between 10-12 weeks of staff time each year. Put in the context of our larger MTW goals, this will allow more staff time to devote to activities that better support our residents and address larger community needs. Our residents will benefit by not having to go through the process every year – it will save them time, stress and headaches.

Safe Harbors:

i. Reexaminations must occur at least every three years.

ii. HAN will allow at least one interim adjustment per year at the request of the household, if the household gross income

has decreased 10% or more.

iii. HAN will conduct an impact analysis for this activity.

iv. iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Full Time Students

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

After implementation of our current Alternative Reexamination activity, our agency was able to evaluate challenges and barriers to implementation of the activity. These challenges were identified as rejection of 50058 submittals to PIC with future dates past 12 months of annual recertification date, and an increased in PIC fatal errors. As a solution to this barrier,

HAN plans to modify its Alternative Reexamination Schedule for all PH and HCV clients.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

MTW clients are not required to report increases/decreases in income between biennial recertifications; however, they must report all other changes to the household.

3.b. - Alternative Reexamination Schedule for Households (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN plans to modify its Alternative Reexamination Schedule for all PH and HCV clients. HAN will return to annual recertifications for all eligible PH and HCV households. Elderly/disabled households will continue to have the options to complete triennial recertifications from this provision and can complete an interim recertification at any time. Clients that believe they qualify for a hardship may request an interim recertification. HAN will allow one interim decreased rent adjustment per annual without a hardship request. Any additional interim decrease rent adjustments will require a hardship request according to the guidelines of the hardship policy. Interim increased rent adjustments must be reported. However, rent increases will take place if total household income increase by 20% . No rent change will be adjusted if income fall below 20%. Elderly/disabled household clients are not required to report increases/decreases in income between triennial recertifications; however, they must report all other household composition changes. This modification will allow us to achieve a more efficient use of our limited staff time and resources. We estimate that will eliminate between 10-12 weeks of staff time each year. Put in the context of our larger MTW goals, this will allow more staff time to devote to activities that better support our residents and address larger community needs. Our residents will benefit by not having to go through the process every year – it will save them time, stress and headaches.

Safe Harbors:

- i. Reexaminations must occur at least every three years.
- ii. HAN will allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.
- iii. HAN will conduct an impact analysis for this activity.
- iv. iv. Hardship requests will be processed per HAN'S MTW Rent Reform Hardship Policy.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation); Other –

another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Full Time Students

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

MTW clients are not required to report increases/decreases in income between biennial recertifications; however, they must report all other changes to the household.

4.b. - Damage Claims (HCV-Tenant-based Assistance)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN average HAP is \$1,181. HAN will provide a one-time up to \$1,000 claim reimbursement for damages for a specific unit. If the tenant leaves the unit damaged, the amount of damage claims will not exceed \$1000 or lesser of the cost of repairs. The participant security deposit must first be used to cover damages and the agency before reimbursement is distributed to cover the remaining repairs. The payment must be made to the landlord when the next HAP contract is executed between the owner and HAN. The owner will be required to submit the claim with documentation be claim can be paid. This activity will retain current landlords within the HCV program as well as attract new landlords who may have reservations of joining the HCV program due to tenant turnover.

Safe Harbors:

- i. If the tenant leaves the unit damaged, the amount of the damage claims must not exceed the lesser of the cost of repairs or two months of contract rent.
- ii. The tenant's security deposit must first be used to cover damages and the agency may provide up to two months of contract rent minus the security deposit to cover remaining repairs.
- iii. The payment will be made to the landlord when the next HAP contract is executed between the owner and the HAN.
- iv. HAN will update its Administrative Plan to reflect the vacancy loss policy.

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to all tenant-based units
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?) To all units
What is the maximum payment that can be made to a landlord under this policy? Up to \$1000.00
How many payments were issued under this policy in the most recently completed PHA fiscal year? 0
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? \$0

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative HAN's average HAP is \$1,181. HAN will continue to give all landlords a one-time signing bonus of up to \$1000 for providing new units to the HCV program. A landlord can receive one bonus annually no more than one month of the contract rent. Payments made to the landlord will be \$1000 or no more than one month of contract rent. The payment must be made to the landlord when the HAP contract is executed between the owner and HAN. Safe Harbors: i. Payments made to the landlord must be equal to no more than one month of the contract rent. ii. The payment will be made to the landlord when the next HAP contract is executed between the owner and the HAN.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)

To all units

What is the maximum payment that can be made to a landlord under this policy?

\$1000.00

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

10.d.PH - Modify or Eliminate the Contract of Participation (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will modify the FSS contract of participation to reflect the removal of the traditional escrow model and the implementation of the new Goal Rewards Model. This involves modifying the following sections in the FSS Contract: FSS Escrow Account; Withdrawal of Funds from FSS Escrow Account; Loss of FSS Escrow Account; and HA Responsibilities. This change is part of a shift to a participant-driven coaching model that will give participants more empowerment and ownership of their path forward while still providing needed guidance. It will increase collaboration and trust between staff and participants to make progress toward goals. These changes shift the agency-participant relationship away from rule enforcement and toward life coaching. FSS staff will help participants clarify program goals based on their needs, abilities, and skills.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

No

No document is attached.

10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will modify the FSS contract of participation to reflect the removal of the traditional escrow model and the implementation of the new Goal Rewards Model. This involves modifying the following sections in the FSS Contract: FSS Escrow Account; Withdrawal of Funds from FSS Escrow Account; Loss of FSS Escrow Account; and HA Responsibilities. This change is part of a shift to a participant-driven coaching model that will give participants more empowerment and ownership of their path forward while still providing needed guidance. It will increase collaboration and trust between staff and participants to make progress toward goals. These changes shift the agency-participant relationship away from rule enforcement and toward life coaching. FSS staff will help participants clarify program goals based on their needs, abilities, and skills.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

No

No document is attached.

10.e.PH - Policies for Addressing Increases in Family Income (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will replace the Family Self-Sufficiency (FSS) escrow model with a Goal Rewards Model. In the proposed model, participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives can immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will receive the incentive immediately via disburse check at the time the goal is completed. Participants will have the opportunity to start an individual savings account managed by Bank of OZK. Participants who elect this incentive will be able to make deposits into their Individual Savings Account (ISA) while participating in the FSS program. HAN will match the dollar amount deposit up to \$1,000 per year the into an individual savings account. Withdrawals from ISA account will not be allowed unless certain interim goals are established in the Contract of Participation (CoP) and the participant needs a portion of the funds for purposes consistent with or in support of the CoP, such as completion of higher education (i.e., college, graduate school), job training, vehicle repair or to meet start-up expenses involved in creation of a small business. Upon HAN's discretion, a disbursement of a portion of the funds from the family's ISA may be given to assist the family in paying those expenses. At this time, increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program. HAN proposes modifying the FSS contract of participation to reflect the new Goal Rewards Model based on achievement of self-sufficiency activities. This involves modifying the following sections in the FSS Contract: FSS Escrow Account; Withdrawal of Funds from FSS Escrow Account; Loss of FSS Escrow Account; and HAN Responsibilities. Current FSS participants who are within 12 months of completion of FSS program will have the option to choose to remain on the current FSS Escrow Model or switch to the Goal Rewards Model. If an extension of the contract is needed to complete goals, the participants will be placed on the Goal Rewards Model All other FSS participants who are 13 months or more upon completion of FSS contract will be placed on the Goal Rewards Model and will be able to benefit from immediate cash incentives upon completion of goals. If the PHA or owner determines that the FSS family has fulfilled Unless the interim disbursement was made based on fraudulent information from the family, the family is not required to

repay such interim disbursements if the family does not complete the CoP.

Safe Harbors:

- i. HAN will review FSS Guidance.
- ii. HAN will execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.
- iii. HAN will have an update, approved FSS Action Plan in accordance with the 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.
- iv. HAN will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.

Which of the MTW statutory objectives does this MTW activity serve?

Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

No

No document is attached.

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

At this time, increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program.

10.e.HCV - Policies for Addressing Increases in Family Income (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will replace the Family Self-Sufficiency (FSS) escrow model with a Goal Rewards Model. In the proposed model, participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives can immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will receive the incentive immediately via disburse check at the time the goal is completed. Participants will have the opportunity to start an individual savings account managed by an accredited financial institution. Participants who elect this incentive will be able to make deposits into their Individual Savings Account (ISA) while participating in the FSS program. HAN will match the dollar amount deposit up to \$1,000 per year the into an individual savings account. Withdrawals from ISA account will not be allowed unless certain interim goals are established in the Contract of Participation (CoP) and the participant needs a portion of the funds for purposes consistent with or in support of the CoP, such as completion of higher education (i.e., college, graduate school), job training, vehicle repair or to meet start-up expenses involved in creation of a small business. Upon HAN's discretion, a disbursement of a portion of the funds from the family's ISA may be given to assist the family in paying those expenses. At this time, increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program. HAN proposes modifying the FSS contract of participation to reflect the new Goal Rewards Model based on achievement of self-sufficiency activities. This involves modifying the following sections in the FSS Contract: FSS Escrow Account; Withdrawal of Funds from FSS Escrow Account; Loss of FSS Escrow Account; and HAN Responsibilities. Current FSS participants who are within 12 months of completion of FSS program will have the option to choose to remain on the current FSS Escrow Model or switch to the Goal Rewards Model. If an extension of the contract is needed to complete goals, the participants will be placed on the Goal Rewards Model All other FSS participants who are 13 months or more upon completion of FSS contract will be placed on the Goal Rewards Model and will be able to benefit from immediate cash incentives upon completion of goals. If the PHA or owner determines that the FSS family has fulfilled Unless the interim disbursement was made based on fraudulent information from the family, the family is not required to repay such interim disbursements if the family does not complete the CoP.

Safe Harbors:

- i. HAN will review FSS Guidance.
- ii. HAN will execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program.
- iii. HAN will have an update, approved FSS Action Plan in accordance with the 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract.
- iv. HAN will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

No

No document is attached.

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

At this time, increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program.

12.a. - Work Requirement (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will implement a work requirement that will apply to all PH and HCV household members 19-61. Each family member ages 19-61 years of age is required to be employed a minimum of 15 hours per week (30 hours per week minimum households with multiple eligible members) or meet a qualify work activity. This activity will move participant families toward self sufficiency and financial independence thereby breaking the cycle of poverty and dependence on subsidies.

Safe Harbors:

- i. The work requirement policy will apply to all eligible individuals, the maximum requirement will be 15 hours of work per week per individual.
- ii. The work requirement policy will apply to all eligible households, the maximum requirement will be 30 hours of work per week per household.
- iii. Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance.
- iv. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.
- v. Those individuals exempted from the Community Service Requirement in accordance with Section 12(c)(2)(A)(B)(D) and (E) of the 1937 Act must be exempt from HAN's work requirement in both the PH and HCV programs.
- vi. Individuals who are primary caretaker for child under 6 years of age or who are pregnant must also be exempt from the agency's work requirement.
- vii. Supportive services shall be provided, either through the agency or a partner organization, to assist families in obtaining employment or an acceptable substitute, as defined by the HAN's MTW policy.
- viii. Work requirements shall not be applied to exclude, or have the effect of excluding, the admission into housing or participation in supportive services by persons with disability or elderly, or families that include persons with disabilities or elderly individuals.
- ix. HAN will conduct an annual impact analysis.
- x. HAN will implement a hardship policy, including a policy to address tenants seeking a determination of disability status.
- xi. The Hardship Policy in the ACOP and/ or Administrative Plan will apply to families who are actively trying to comply with the agency's work requirement, but are having difficulties obtaining work or an acceptable substitute.
- xii. The ACOP and/or Administrative Plan must also describe the consequences of failure to comply with the work requirement.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

12.b. - Work Requirement (HCV)

Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?

Yes

Please describe the conditions for exemption.

Full Time Students

What counts as "work" under this the work requirement MTW activity?

Earned Income of (15hrs) of work per individual and/or Earned Income of (30hrs) or work per household.

How will the MTW agency monitor compliance with the work requirement MTW activity?

HAN will monitor compliance with the work requirement through completion of reported and verified income during recertifications and interims. This will include reported income from participants as well as verified income of our Enterprise Income Verification (EIV) systems.

What supportive services are offered to support households to comply with the work requirement?

HAN will provide case management supportive services to assist with households to comply with the work requirement such as referrals to local career center and vocational rehabilitation.

How does the agency address noncompliance with the work requirement policy?

How many households are currently subject to the policy?

0

How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?

0

12.b. - Work Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

HAN will implement a work requirement that will apply to all PH and HCV household members 19-61. Each family member ages 19-61 years of age is required to be employed a minimum of 15 hours per week (30 hours per week minimum households with multiple eligible members) or meet a qualify work activity. This activity will move participant families toward self sufficiency and financial independence thereby breaking the cycle of poverty and dependence on subsidies.

Safe Harbors:

- i. The work requirement policy will apply to all eligible individuals, the maximum requirement will be 15 hours of work per week per individual.
- ii. The work requirement policy will apply to all eligible households, the maximum requirement will be 30 hours of work per week per household.
- iii. Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance.
- iv. To ensure this initiative target residents who can work, elderly and disabled families, as well as full-time students will be exempt.
- v. Those individuals exempted from the Community Service Requirement in accordance with Section 12(c)(2)(A)(B)(D) and (E) of the 1937 Act must be exempt from HAN's work requirement in both the PH and HCV programs.
- vi. Individuals who are primary caretaker for child under 6 years of age or who are pregnant must also be exempt from the agency's work requirement.
- vii. Supportive services shall be provided, either through the agency or a partner organization, to assist families in obtaining employment or an acceptable substitute, as defined by the HAN's MTW policy.
- viii. Work requirements shall not be applied to exclude, or have the effect of excluding, the admission into housing or participation in supportive services by persons with disability or elderly, or families that include persons with disabilities or elderly individuals.
- ix. HAN will conduct an annual impact analysis.
- x. HAN will implement a hardship policy, including a policy to address tenants seeking a determination of disability status.
- xi. The Hardship Policy in the ACOP and/ or Administrative Plan will apply to families who are actively trying to comply with the agency's work requirement, but are having difficulties obtaining work or an acceptable substitute.
- xii. The ACOP and/or Administrative Plan must also describe the consequences of failure to comply with the work requirement.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?

Yes

Please describe the conditions for exemption.

Full Time Students.

What counts as "work" under this the work requirement MTW activity?

Earned Income of (15hrs) of work per individual and/or Earned Income of (30hrs) or work per household.

How will the MTW agency monitor compliance with the work requirement MTW activity?

HAN will monitor compliance with the work requirement through completion of reported and verified income during recertifications and interims. This will include reported income from participants as well as verified income of our Enterprise Income Verification (EIV) systems.

What supportive services are offered to support households to comply with the work requirement?

HAN will provide case management services to refer participants to community resources according to the participants needs. A needs assessment may be conducted to assist in identifying participant's needs.

How does the agency address noncompliance with the work requirement policy?

HAN will make efforts to assist individuals with compliance of the work requirement. Participants who do not meet the minimum work hours required due to lack of employment , will have to report to the HA each month for interim examinations and adjustments.

How many households are currently subject to the policy?

0

How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?

0

D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2023	\$2,085,587	\$1,876,840	\$208,747	2022-12-31

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
Income Level		Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income		
49%-30% Area Median Income		
Below 30% Area Median Income		
Total Local, Non-Traditional Households		0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No</p> <p>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. MTW agency did not established a rent reform policy to encourage employment and self-sufficiency HAN do not have any future rent reform activities at this time.</p>	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if Population Type is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
------------------------	--------	------	------	------	------	-------	-------------	------------------	-----------------------------	--	---	---	--

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
------------	--

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.
No known evaluations.	

- **12.a and 12.b – Work Requirement** – Work requirement will apply to all public housing household members aged 19-61 the requirement is to be employed a minimum of 15 hours per week or 30 hours per week minimum for household with multiple eligible members or meet a qualifying work activity. This activity will move participant families toward self-sufficiency and financial independence.
- **10.e FSS Program with MTW Flexibilities: HAN** will replace the FSS Escrow model with Goal Reward Program. Ms. Ralls explained what all was proposed in the model the participants would earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals.

Ms. Ralls Stated that the entire hearing will be recorded so that anyone can request a copy to go back and review and or look at for the first time upon requested.

Discussion and or Questions: Ms. Ralls asked.

1. Ms. Bereatha Brooks – ask what if you child is 18 years of age and is a full-time student and is still in school, does that apply to them as well for the supplement on Work Requirements? Ms. Ralls stated that if the child is a full-time student, then this does not apply if the parents are working over the work requirement limit. Property manager stated that they would check on this to be sure of answer.

Ms. Ralls Announced the Housing Authority of Newnan – Clean Up Day -. March 17, 2023, we will focus on 3 Areas 1. Boone, 2. Neal,3. Cliff but may other areas if we have a large turnout of volunteers. We have asked youth, Residents, and community Partners to help collect trash from the community together.

Thank you,

Ms. Ralls and Ms. Chunn thanked everyone for their attendance at the hearing.

Meeting Adjourned at 6:10pm.

12.14.2022 Moving to Work
Resident Advisory Board Meeting via Zoom
Minutes and Resident Advisory Board Comments

- The meeting was called to order at 5:06pm.
- There were not enough Resident Advisory Board Members in attendance for a quorum.
- Mrs. Wendy Keith, Vice President of the Resident Advisory Board was in attendance.
- Staff in attendance: Khristian Ralls Director of Resident Services; Khristian Ralls, Moving to Work Coordinator; Bessie Chun, Ross Coordinator.
- Mrs. Ralls asked each resident have they reviewed the MTW supplement and do anyone have any questions.
- Ms. Keith stated she has reviewed the MTW supplement and did not have any questions or comments regarding the MTW Supplement at this time.
- Ms. Ralls informed the residents of the MTW General Public meeting on February 15, 2023, at 6:00pm and encouraged Ms. Keith to inform the residents to attend the meeting. Mrs. Ralls also informed the residents that a copy of the MTW supplement will be available at the office or may emailed to residents upon request.
- Meeting was adjourned at 5:25pm.

MTW CERTIFICATIONS OF COMPLIANCE***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

HOUSING AUTHORITY OF NEWMAN

GA092

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

OTIS JONES, III

CHAIRMAN

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

5/31/22

* *Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

RESOLUTION NO.09-2023

**APPROVAL TO WRITE-OFF COLLECTION LOSSES FOR
JANUARY – MARCH 2023**

Be it resolved that the Collection Losses for January-March 2023 be written off as presented:

Collection Losses -	\$9,780.00	January 2023
	\$71.00	February 2023
	\$7,411.45	March 2023

Chairman Otis Jones, III entertained a motion to approve Resolution 09-2023. Commissioner Goode made the motion for approval, Commissioner Hooks seconded the motion. The motion was accepted unanimously by the Board.

Financial Reports

Candace Atkinson, Director of Operations presented the Board Operating Statements for January 2023 and Bank Statements from April 2023. Our accounting firm will provide updated Board Operating Statements via email to the board once completed.

RESOLUTION NO.10-2023

The board unanimously accepted the financials as presented.

Chairman Otis Jones, III entertained a motion to approve Resolution 10-2023. Commissioner Hooks made the motion for approval, Commissioner Goode seconded the motion. The motion was accepted unanimously by the Board.

RESOLUTION NO.11-2023

**APPROVAL FOR ANNUAL PLAN AND MTW SUPPLEMENT
FISCAL YEAR 2023:**

Be it resolved that the FY 2023 Annual Plan and the MTW Supplement be approved.

Chairman Otis Jones, III entertained a motion to approve Resolution 11-2023. Commissioner Barron made the motion for approval, Commissioner Goode seconded the motion. The motion was accepted unanimously by the Board.



Housing Authority of Newnan Moving to Work Hardship Policy

HAN's Hardship Policy will apply to the following activities: *1.e, 1f. Minimum Rent, 1.m, 1.n Utility Reimbursements, 1.r, 1.s Elimination of Deductions, 1.v, 1.w Alternative Income Inclusions/Exclusions, 3.a, 3.b Alternative Reexamination, and 12.a, 12.b Work Requirement.* If the household gross income has decreased 10% or greater, families may request an interim for hardship if the family experienced decrease in income because of a changed circumstance due to loss/reduction in employment, death in the family's income earnings, reduction in other earnings or assistance that cannot be replaced, or if there has been an increase because of changed circumstances for medical cost, childcare, transportation, education, etc. Proof of income must be provided supporting evidence of how the MTW activity/activities caused an undue financial burden and may include current expenses relate to childcare, health, transportation, and similar supporting proof.

Definition of Hardship Types

A **HARDSHIP** exists when:

- The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program;
- The family would be evicted as a result of the imposition of MTW activities;
- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- The family has an increase in expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the agency to be appropriate.

NO HARDSHIP exists when:

- The Housing Authority determines there is no qualifying hardship

- MTW activities will be reinstated, including requiring back payment of minimum rent and other costs or fees to HAN for the time of suspension.

TEMPORARY HARDSHIP exists when:

- The Housing Authority determines that there is a qualifying hardship but that it is of a temporary nature. The MTW activity will not be imposed for a period of 90 days from the date of the family's request
- At the end of the 90-day period, the MTW activity will be imposed retroactively to the time of suspension. HAN will offer a reasonable repayment agreement for any minimum rent back payment and any other costs and fees paid by HAN on the family's behalf during the period of suspension.

LONG-TERM HARDSHIP exists when:

- The Housing Authority determines there is a long-term hardship.
- The family will be exempt from the MTW activity until the hardship no longer exists.
- The HRHA Hardship Policy allows the authority the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible.
- Zero income households must report income or income changes every 90 days or when income begins.

Until income is restored to the household, households must continue to meet the definitions of hardship types above and also meet all of the following criteria:

- Remain in compliance with all program requirements
- Not owe The Housing Authority any money or be current with a re-payment agreement
- Continued lack of income has not been through the fault of the household
- Have applied for financial resources it may be eligible for but been unsuccessful in securing those

- Request the hardship waiver within the deadline set by The Housing Authority. Households have 10 business days from the date of their “Notice of Change” letter in which to request an Informal Hearing
- Have not received hardship relief for the same MTW activity previously

1.e, 1. f Minimum Rent - If the application of this activity creates a hardship, households may return to minimum rent of \$50 for a time period according to the policies and guidelines above for Hardship Types as determined by The Housing Authority.

1.r, 1.s Elimination (CAP) of Unreimbursed Child Care Deduction - Households that may experience a hardship from the Limit/CAP of the Child Care deduction may make a request for rent reduction according to the policies and guidelines above for Hardship Types.

3.a, 3.b Alternative Reexamination- Households that may experience a hardship from Alternative Reexamination may make a request for rent reduction according to the policies and guidelines above for Hardship Types.

Each household is eligible for only one interim for each MTW initiative. If the household qualifies for more than one relief at any given recertification (annual or interim), the reliefs will be calculated concurrently.

Requesting a Hardship Exception

While the hardship request is under review, the Housing Authority will suspend the MTW activity/activities for the household, beginning the next month after the request, until the HAN has determined if the request is warranted. If the Housing Authority determines a hardship exist, Housing Authority will continue to provide the household an exemption from the MTW activity/activities for up to 90 days. The HAN will determine what constitutes a financial hardship and it will be defined but not limited to following:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the agency to be appropriate.

If the hardship request does not meet its hardship standards, the household must resume the MTW activity/activities, and the HAN will collect any retroactive rent if applicable through a reasonable repayment agreement. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.



**Housing Authority of Newnan Moving to Work
Hardship Policy**

HAN's Hardship Policy will apply to the following activities: *1.e, 1f. Minimum Rent, 1.m, 1.n Utility Reimbursements, 1.r, 1.s Elimination of Deductions, 1.v, 1.w Alternative Income Inclusions/Exclusions, 3.a, 3.b Alternative Reexamination, and 12.a, 12.b Work Requirement.* If the household gross income has decreased 10% or greater, families may request an interim for hardship if the family experienced decrease in income because of a changed circumstance due to loss/reduction in employment, death in the family's income earnings, reduction in other earnings or assistance that cannot be replaced, or if there has been an increase because of changed circumstances for medical cost, childcare, transportation, education, etc. Proof of income must be provided supporting evidence of how the MTW activity/activities caused an undue financial burden and may include current expenses relate to childcare, health, transportation, and similar supporting proof.

Definition of Hardship Types

A **HARDSHIP** exists when:

- The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program;
- The family would be evicted as a result of the imposition of MTW activities;
- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- The family has an increase in expenses because of changed circumstances, such as for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the agency to be appropriate.

NO HARDSHIP exists when:

- The Housing Authority determines there is no qualifying hardship

- MTW activities will be reinstated, including requiring back payment of minimum rent and other costs or fees to HAN for the time of suspension.

TEMPORARY HARDSHIP exists when:

- The Housing Authority determines that there is a qualifying hardship but that it is of a temporary nature. The MTW activity will not be imposed for a period of 90 days from the date of the family's request
- At the end of the 90-day period, the MTW activity will be imposed retroactively to the time of suspension. HAN will offer a reasonable repayment agreement for any minimum rent back payment and any other costs and fees paid by HAN on the family's behalf during the period of suspension.

LONG-TERM HARDSHIP exists when:

- The Housing Authority determines there is a long-term hardship.
- The family will be exempt from the MTW activity until the hardship no longer exists.
- The HRHA Hardship Policy allows the authority the flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. To be considered for a hardship exemption, the household must apply for all benefits for which it may be eligible.
- Zero income households must report income or income changes every 90 days or when income begins.

Until income is restored to the household, households must continue to meet the definitions of hardship types above and also meet all of the following criteria:

- Remain in compliance with all program requirements
- Not owe The Housing Authority any money or be current with a re-payment agreement
- Continued lack of income has not been through the fault of the household
- Have applied for financial resources it may be eligible for but been unsuccessful in securing those

- Request the hardship waiver within the deadline set by The Housing Authority. Households have 10 business days from the date of their “Notice of Change” letter in which to request an Informal Hearing
- Have not received hardship relief for the same MTW activity previously

1.e, 1. f Minimum Rent - If the application of this activity creates a hardship, households may return to minimum rent of \$50 for a time period according to the policies and guidelines above for Hardship Types as determined by The Housing Authority.

1.r, 1.s Elimination (CAP) of Unreimbursed Child Care Deduction - Households that may experience a hardship from the Limit/CAP of the Child Care deduction may make a request for rent reduction according to the policies and guidelines above for Hardship Types.

3.a, 3.b Alternative Reexamination- Households that may experience a hardship from Alternative Reexamination may make a request for rent reduction according to the policies and guidelines above for Hardship Types.

Each household is eligible for only one interim for each MTW initiative. If the household qualifies for more than one relief at any given recertification (annual or interim), the reliefs will be calculated concurrently.

Requesting a Hardship Exception

While the hardship request is under review, the Housing Authority will suspend the MTW activity/activities for the household, beginning the next month after the request, until the HAN has determined if the request is warranted. If the Housing Authority determines a hardship exist, Housing Authority will continue to provide the household an exemption from the MTW activity/activities for up to 90 days. The HAN will determine what constitutes a financial hardship and it will be defined but not limited to following:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance;
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; and
- Such other situations and factors determined by the agency to be appropriate.

If the hardship request does not meet its hardship standards, the household must resume the MTW activity/activities, and the HAN will collect any retroactive rent if applicable through a reasonable repayment agreement. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

1.e Minimum Rent (PH)

Through implementation of this activity, HAN's effort is to promote our (PH) participants toward *Self-Sufficiency and achieve Cost Effectiveness* of federal dollars and other agency cost.

- Implementation of this activity will impact on agency finances by reducing Utility Reimbursement Payments. HAN's current minimum rent is \$50.00. HAN (PH) currently has approximately 40 households who are Minimum Rent Candidates and total of approximately 103 households who receive a Utility Reimbursements. The current total amount of utility reimbursements issued each month estimates at \$ 11,874.00 per month. This activity will reduce the number of households to receive a credit on their account and receive a utility reimbursement. After implementation of this activity, utility reimbursements issued each month will be approximately \$3,634 per month and will reduce agency cost on UR approximately 70%.
- Implementation of this activity will impact the *Housing Cost Affordability* by increasing the minimum rent to \$130 to all participants. All minimum rent increases will occur July 1, 2022. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with the HAN Hardship Policy on a case-by case basis.
- This activity will not impact *the waitlist(s)*
- HAN will monitor impact of the *termination rates* after implementation of this activity. HAN's Hardship Policy will lessen the overall impact of *terminations rates*.
- This activity will not impact *Public Housing occupancy level and voucher utilization*.
- This activity will meet the *MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice* by reducing agency cost of utility reimbursements and increase participant's self-sufficiency. HAN will measure this activity by conducting an analysis on the number of households who do not currently contribute income towards their rental cost and/or households who are awarded a utility reimbursement.
- This activity will meet the five *MTW statutory requirements*.
- HAN will monitor the number of *hardship request* and the number granted and denied as a result of this MTW activity.

1.f Minimum Rent (HCV)

Through implementation of this activity, HAN's effort is to promote our (HCV) participants toward *Self-Sufficiency and achieve Cost Effectiveness* of federal dollars and other agency cost.

Implementation of this activity will have impact on agency finances by reducing utility reimbursement payments. HAN's current minimum rent is \$50.00. HAN (HCV) currently has approximately 25 households who are Minimum Rent Candidates, and a total of approximately 22 households who receive a utility reimbursement. The current total amount of HAP spending each month is approximately \$29,434.00. After implementation of this activity, HAP spending will be reduced to \$27,434.00 and will save the agency approximately \$2,000 per month.

- This activity will decrease the number of Minimum Rent Candidates from 40 to approximately 36, and a total of 45 households to receive a utility reimbursement. The current total amount of utility reimbursements issued each month will be approximately \$3,634 per month and will reduce agency cost on UR approximately 70%.
- Implementation of this activity will impact the *Housing Cost Affordability* by increasing the minimum rent to \$130 to all participants. All minimum rent increases will occur July 1, 2022. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.
- This activity will not impact *the waitlist(s)*
- HAN will monitor the impact of the *termination* rates after implementation of this activity. HAN's Hardship Policy will lessen the overall impact of terminations rates.
- This activity will not impact *Public Housing occupancy level and voucher utilization*.
- This activity will meet *the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice* by reducing agency cost of utility reimbursements and increase participant's self-sufficiency. HAN will measure this activity by conducting an analysis on the number of households who do not currently contribute income towards their rental cost and households cost and/or households who are awarded a utility reimbursement.
- This activity will meet the five *MTW statutory requirements*.
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

1.r. Elimination of Deductions (Childcare)/(PH)

Through implementation of this activity, HAN’s efforts are to promote our (PH) participants toward *Self-Sufficiency* and achieve *Cost Effectiveness* of federal dollars and other agency cost.

Implementation of this Activity will Impact the *Agency’s Finances*. This activity will modify existing rules and regulations to the childcare deduction and create a limit/cap on the amount of childcare deduction applied to the participant’s rent calculation. This activity allows HAN to place a cap on childcare deductions that will replicate the Georgia Childcare and Parent Services (GA CAPS). The Georgia Department of Early Care and Learning provides low-income families afford safe, and quality childcare by subsidizing childcare costs for children under the age of 13.

HAN will measure this activity by conducting an analysis on the reduction of childcare deductions included in the PH rent calculations. This activity will increase Total Tenant Payments (TTP) as well as increase agency revenue. HAN’s current childcare deductions for (PH) is approximately \$ 290,594.00.

HAN’s goal is to reduce the amount of childcare deduction calculated in the TTP. This will increase participant’s self-sufficiency and agency revenue.

HAN will align childcare costs to match the GA CAPS reimbursement amounts according to the categorical maximum amounts filtered by age. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

HAN’s current policy allows participants to deduct 100% of childcare cost from the annual total household income without limitations of cost.

Type of Care	Zone 1			Zone 2			Zone 3		
	Center	Family	Informal	Center	Family	Informal	Center	Family	Informal
Full-time (per week)									
Infant (birth - 12 months)	\$150	\$125	\$95	\$110	\$90	\$80	\$85	\$80	\$50
Toddler (1-2 years)	\$144	\$120	\$85	\$102	\$88	\$80	\$85	\$76	\$50
Preschool (3-5 years)	\$124	\$105	\$75	\$92	\$85	\$70	\$80	\$75	\$49
School age (6 years & older)	\$115	\$85	\$75	\$90	\$75	\$70	\$75	\$75	\$49
Part-time (per day)									
All ages	\$40	\$30	\$25	\$27	\$25	\$22	\$21	\$20	\$15
Before and after school (per week)									
All ages	\$70	\$55	\$50	\$60	\$53	\$50	\$45	\$40	\$35

[AppendixC-CAPS Reimbursement Rates.pdf \(ga.gov\)](#)

This activity will impact the Housing Cost Affordability by creating a limit/cap on childcare deductions that will not exceed the GA CAPS Reimbursement Rates. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- HAN will monitor impact of the termination rates after implementation this activity. HAN's Hardship Policy will lessen the overall impact of terminations rates.
- This activity will not impact Public Housing occupancy level and voucher utilization
- This activity will meet the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice by reducing the amount of childcare deductions calculated in the Total Tenant Payment (TTP) and increase participant's self-sufficiency. Implementation of this activity will reduce the amount of childcare deductions calculated in TTP by approximately 95%.
- *This activity will meets the five MTW statutory requirements.*
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

1.s. Elimination of Deductions (Childcare)/(HCV)

Through implementation of this activity, HAN's effort is to promote our (HCV) participants toward *Self-Sufficiency* and achieve *Cost Effectiveness* of federal dollars and other agency cost.

Implementation of this Activity will Impact the *Agency's Finances*. *This activity* will modify existing rules and regulations to the childcare deduction and create a limit/cap on the amount of childcare deduction applied to the participant's rent calculation. The activity allows HAN to place a cap on childcare deductions in line the Georgia Childcare and Parent Services (GA CAPS). The Georgia Department of Early Care and Learning provides low-income families afford safe, and quality childcare by subsidizing childcare costs for children under the age of 13.

HAN will measure this activity by conducting an analysis on the reduction of childcare deductions included in the HCV rent calculations which will increase Total Tenant Payments (TTP) and increase agency revenue. HAN current childcare deductions for (HCV) is approximately \$15,640.

HAN's goal is to reduce the amount of childcare deduction calculated in the TTP. This will increase participant's self-sufficiency and agency revenue.

HAN will align childcare costs to match the GA CAPS reimbursement amounts according to the categorical maximum amounts filtered by age. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

HAN’s current policy allows participants to deduct 100% of childcare cost from the annual total household income without limitations of cost.

Type of Care	Zone 1			Zone 2			Zone 3		
	Center	Family	Informal	Center	Family	Informal	Center	Family	Informal
Full-time (per week)									
Infant (birth - 12 months)	\$150	\$125	\$95	\$110	\$90	\$80	\$85	\$80	\$50
Toddler (1-2 years)	\$144	\$120	\$85	\$102	\$88	\$80	\$85	\$76	\$50
Preschool (3-5 years)	\$124	\$105	\$75	\$92	\$85	\$70	\$80	\$75	\$49
School age (6 years & older)	\$115	\$85	\$75	\$90	\$75	\$70	\$75	\$75	\$49
Part-time (per day)									
All ages	\$40	\$30	\$25	\$27	\$25	\$22	\$21	\$20	\$15
Before and after school (per week)									
All ages	\$70	\$55	\$50	\$60	\$53	\$50	\$45	\$40	\$35

[AppendixC-CAPS Reimbursement Rates.pdf \(ga.gov\)](#)

This activity will impact the Housing Cost Affordability by creating a limit/cap on childcare deductions that will not exceed the GA CAPS Reimbursement Rates. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- HAN will monitor impact of the termination rates after implementation this activity. HAN’s Hardship Policy will lessen the overall impact of terminations rates.
- This activity will not impact Public Housing occupancy level and voucher utilization
- This activity will meet the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice by reducing the amount of childcare deductions calculated in the Total Tenant Payment (TTP) and increase participant’s self-sufficiency. Implementation of this activity will reduce the amount of childcare deductions calculated in TTP by approximately 95%.
- *This activity meets the five MTW statutory requirements.*

- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

Alternative Reexamination 3.a. (PH)

This activity will implement Biennial Recertification for family Units and Triennial Recertifications for elderly/disabled household for all PH Clients (New Admission and Currently Assisted) at all locations. HAN will allow an interim adjustment at the request of the household, if the household gross income has decreased 10% or more.

- This activity *Impact the Agency's Finances* by reducing staff time and costs, as well as being less invasive and time consuming for our residents. Current regulations require annual recertification and verification to determine that a household meets program requirements. All households that report no income or no income from wages on an annual recertification will be scheduled to report increases in income every 90 days.
- *This Activity will not impact Housing Cost Affordability*
- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- *This activity will not impact The termination rate (s)*
- This activity will not impact Public Housing occupancy level and voucher utilization
- *This Activity Meets the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice.* HAN will use this activity for all participants of the PH program. The agency as well as households will experience time savings due to fewer re-examinations and, HAN will save additional staff time by eliminating the need to process and update consent forms between scheduled reexaminations and manage the cumbersome process of beginning program termination for non-receipt of consent forms. Participant families on the biennial or triennial schedule may also see income savings as a result of HAN not recalculating rent portions during the interim.

HAN will measure this activity by conducting an analysis on the reduction of (PH) reexaminations completed per year and the reductions in administrative time to complete reexaminations.

HAN currently process approximately 422 (PH) Recertifications per year and averages 51 Recertifications per month. Approximately 12 recertifications per week are completed between 2 staff members. Implementation will significantly reduce annual recertifications by 50%. This activity will also reduce administrative time. It currently takes approximately 2 hours per reexamination to complete. Implementation of this activity will reduce administrative time from 24 hours per week to 12 hours per

week. This activity will significantly reduce administrative time by 50%. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- *This activity meets the five MTW statutory requirements.*
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity.

Alternative Reexamination 3.b. (HCV)

This activity will implement Biennial Recertification for family Units and Triennial Recertifications for elderly/disabled household for all HCV Clients. HAN will allow one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

This activity *Impact the Agency's Finances* by reducing staff time and costs, as well as being less invasive and time consuming for our residents. Current regulations require annual recertification and verification to determine that a household meets program requirements. All households that report no income or no income from wages on an annual recertification will be scheduled to report increases in income every 90 days.

- *This Activity will not impact Housing Cost Affordability*
- This activity will not impact the waitlist(s)
- All elderly and disabled households will be exempt from participating in this activity. Therefore, this activity will not impact elderly and disabled families.
- *This activity will not impact The termination rate (s)*
- This activity will not impact Public Housing occupancy level and voucher utilization
- *This Activity Meets the MTW Statutory goals of cost effectiveness, self-sufficiency, and or/ housing choice.* HAN will use this activity for all participants of the PH program. The agency as well as households will experience time savings due to fewer re-examinations and, HAN will save additional staff time by eliminating the need to process and update consent forms between scheduled reexaminations and manage the cumbersome process of beginning program termination for non-receipt of consent forms. Participant families on the biennial or triennial schedule may also see income savings as a result of HAN not recalculating rent portions during the interim.

HAN will measure this activity by conducting an analysis on the reduction of (HCV) reexaminations completed per year and the reductions in administrative time to complete reexaminations.

HAN currently process approximately 167 (HCV) Recertifications per year and averages 14 Recertifications per month. Approximately 4 recertifications per week are completed between 1 staff member. This activity will significantly reduce annual recertifications by 50%. This activity will also reduce administrative time. It currently takes approximately 2 hours per reexamination to complete. Implementation of this activity will reduce administrative time from 8 hours per week to 4 hours per week. Implementation will significantly reduce administrative time by 50%. Upon request, HAN will accept hardship applications and will grant adjustments in accordance with its Hardship Policy on a case-by case basis.

- *This activity meets the five MTW statutory requirements.*
- HAN will monitor the number of hardship request and the number granted and denied as a result of this MTW activity

Impact Analysis for Work Requirement 12.a and 12.b

1. Impact on the agency's finances

The HAN will implement a work requirement. The goal of this activity is to increase personal accountability and personal finance responsibility, which will have a positive impact on the agency's finances.

2. Impact on housing cost affordability

There will be no impact on housing cost affordability.

3. Impact on the waitlist

This activity will not affect the waiting list.

4. Impact on the termination rate

Due to the number of work-related activities participants and tenants can participate in, the HAN anticipates a minimal number of terminations.

5. Impact on the agency's current occupancy level in public housing

This activity is not anticipated to negatively affect the occupancy rate.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

Cost effectiveness: this activity will ensure the goal of cost effectiveness through encouraging participant to become self-sufficient.

Self-sufficiency: this activity will encourage eligible households to seek work related activities.

7. Impact on the agency's ability to meet the MTW statutory requirements

The HAN will be able to meet MTW statutory requirements.

8. Impact on the rate of hardship request and the number granted and denied as a result of an MTW activity

The HAN anticipates a small number of hardship request and few, if any, denials.

9. Impact across other factors above, on protected classes, including disparate impact

This activity will not have a negative impact on the protected classes.

FSS Sample Action Plan

OVERVIEW: The FSS Action Plan is a required document that describes the policies and procedures of the public housing agency (PHA) or multifamily property owner (owner) for operation of a local Family Self-Sufficiency (FSS) program. The requirements for the FSS Action Plan, including the procedures for developing and submitting the plan for HUD approval, are described at [24 CFR 984.201](#).

WHAT DOES THE FSS ACTION PLAN INCLUDE?

In general terms, the FSS Action Plan describes:

- Program size and characteristics of anticipated FSS participants
- Services that the FSS program will offer
- How the FSS program will be administered

See the [FSS Action Plan Checklist](#) for a list of specific items to address in the FSS Action Plan.

RESOURCES: This Sample Action Plan is based on the requirements for an FSS Action Plan specified in [24 CFR 984.201](#) and cross-references these regulations and the HUD guidebook, *Administering an Effective Family Self-Sufficiency Program: A Guidebook Based on Evidence and Promising Practices*. Additional resources for PHA-based FSS programs can be found [here](#). Many of these resources are also applicable to FSS programs offered by multifamily owners. Additional resources for multifamily FSS programs can be found [here](#).

WHO NEEDS AN FSS ACTION PLAN? Every FSS program (funded or not) must have a HUD-approved FSS Action Plan in order to operate an FSS Program, whether the program is offered by a PHA or a multifamily owner or is a combined program for families served by the PHA and one or more owners.

ELIGIBLE ENTITIES. —The following entities are eligible to administer a local FSS program once their Action Plan has been approved:

- A PHA administering housing assistance to or on behalf of an eligible family
- The owner or sponsor of a multifamily property (owner) receiving project-based rental assistance

Each PHA or PBRA project must have its own FSS Action Plan approved by HUD. If an entity manages an FSS program at several sites or if there is a Joint FSS program, you may indicate on the cover page that the Action Plan is essentially identical to *[name the others]* but the demographics and program size sections will be unique to each PHA/project.

Single action plan. A PHA/owner should submit one Action Plan that covers all applicable rental assistance programs (Section 8 vouchers, PBRA, Mod Rehab, and public housing) served by the FSS program.

HOW TO USE THIS DOCUMENT:

- **Left Column: Instructions.** The document has two columns. The left-hand column provides instructions to guide users in completing the Action Plan and a list of policy decisions that need to be made to complete the section.
- **Right Column: Sample Action Plan Text.** The right-hand column contains sample action plan text.
 - FSS programs may adapt this sample text to meet their needs and reflect the specific policies the program elects to adopt. For example, enter the name of the PHA/owner in the spaces marked with “Housing Authority of Newnan,” surrounded by square brackets, and fill in other information surrounded by square brackets.
 - The sample action plan text includes options to include where there is a choice. Instructions (to be deleted after entering your action plan information) are marked as “Instructions” and highlighted in yellow.
 - Suggested options or choices are marked and are highlighted in blue.
- **Document Structure and Sections.** This Sample Action Plan is organized into sections as a suggestion to help users organize the content. FSS programs have discretion to organize the content differently and use different section titles, so long as it includes all of the required content.
- **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.

Table of Contents

I. Introduction	4
II. Program Objectives	4
III. Program Size and Characteristics	5
III.A. – Family Demographics	5
III.B – Supportive Services Needs	9
III. C. – Estimate of Participating Families	10
III. D – Other Self-Sufficiency Programs	11
IV. Family Selection Procedures	12
V. Outreach	17
VI. FSS Escrow Account and Other Incentives for Participants	18
VII. Family Activities and Supportive Services	24
VIII. Method of Identifying Family Support Needs and Delivering Appropriate Support Services	27
IX. Contract of Participation	28
X. Program Termination, Withholding of Services, and Available Grievance Procedures	32
XI. Assurance of Non-Interference	35
XII. Timetable	36
XIII. Reasonable Accommodations, Effective Communications, and Limited English Proficiency	37
XIV. Coordination of Services	38
XIV.A Coordination of Services (PHAs only)	38
XIV.B Coordination of Services (Multifamily owners only)	39
XV. FSS Portability (Applicable to HCV Only)	41
XVI. Other Policies	42
XVII. Definitions	44

I. Introduction

<p>Instructions: While not required by the applicable regulations, an introduction is recommended to provide an overview of what the document is and what it contains.</p>	<p>Introduction</p> <p>This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by <i>Housing Authority of Newnan</i>. It was submitted to HUD on <i>[date]</i>.</p> <p>The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of HUD assistance with public and private resources in order to enable eligible families to make progress toward economic security.</p> <p>The purpose of the FSS Action Plan is to establish policies and procedures for carrying out the FSS program in a manner consistent with HUD requirements and local objectives.</p> <p>This FSS Action Plan describes the <i>Housing Authority of Newnan</i>'s local policies for operation of the FSS program in the context of federal laws and regulations. The FSS program will be operated in accordance with applicable laws, regulations, notices and HUD handbooks. The policies in this FSS Action Plan have been designed to ensure compliance with all approved applications for HUD FSS funding.</p> <p>For PHAs: The FSS program and the functions and responsibilities of PHA staff are consistent with the <i>Housing Authority of Newnan</i>'s personnel policy and Agency Plan.</p>
---	---

II. Program Objectives

<p>Instructions: While not required by the applicable regulations, a section on program objectives can help provide an overall framing for what your FSS program is trying to achieve. Your FSS program is free to adopt whatever local objectives you wish so long as they do not conflict with the federal objectives.</p> <p>The federal objectives for the FSS program are specified in 24 CFR 984.102.</p>	<p>Program Objectives</p> <p><i>Housing Authority of Newnan</i>'s FSS program seeks to help families make progress toward economic security by supporting the family's efforts to:</p> <ul style="list-style-type: none">• Increase their earned income• Build financial capability• Achieve their financial goals
--	---

III. Program Size and Characteristics

III.A. – Family Demographics

<p>Instructions. Describe the characteristics of the families you expect to be served by your FSS program. This information must include data on their race and ethnicity and may also include data on other characteristics.</p> <p>Note: This information is required per 24 CFR § 984.201(d)(1). That section also requires a description of supportive service needs of families expected to be served, which is covered in Section III.B of this sample Action Plan, and how many families are expected to be served, which is covered in Section III.C.</p> <p>Description of sample tables Start by indicating which housing assistance programs your FSS program will serve by checking the appropriate boxes.</p> <p>The sample Action Plan then includes several tables that you</p>	<p>Family Demographics</p> <p>These tables describe the demographics of the population expected to be served by Housing Authority of Newnan’s Action Plan.</p> <p>The FSS program will serve the following housing assistance programs:</p> <ul style="list-style-type: none">• Public Housing,• Housing Choice Vouchers (HCV): Tenant-Based Vouchers• Housing Choice Vouchers (HCV): HCV Homeownership• Housing Choice Vouchers (HCV): Other special purpose vouchers: FUP and Mainstream <p>The Housing Authority of Newnan has been awarded <u>13</u> FUP Vouchers and <u>40</u> Mainstream Vouchers.</p> <p>As of the date of this action plan, <u>9</u> FUP and <u>20</u> Mainstream vouchers have been leased and included in Family Demographics.</p>
---	--

may use to show characteristics of the population expected to be served. If it makes it easier to develop estimates, new FSS programs may assume that FSS participants will be similar to the general population of the PHA or property.

To describe the characteristics of the families your program plans to serve, you may use the tables in the right-hand column and fill them in to provide the appropriate information. You may also modify the tables to specify different ranges or to otherwise reflect the available data. The information requested through the tables should be available on the HUD-50058 or HUD-50059 Family Reports in PIC or TRACS, respectively.

Demographics of FSS Eligible Families

	Public Housing-436	Housing Choice Voucher (77)	FUP (7)	Mainstream (23)
<u>Family Status</u>				
Head – Age 62 Over	158	37	0	1
Head – Under 62	278	40	7	22
Handicapped/Disabled	109	30	0	22
Children	355	75	17	21
<u>Source of Income:</u>				
TANF	2	0	0	0
Child Support	17	12	1	3
Pension	11	2	0	1
Social Security	238	36	0	15
SSI	5	31	1	9
Other (Employed)	198	31	2	0
Unemployed	18	2	4	2
<u>Gender of Head of Household</u>				
Male	84	3	1	5
Female	352	74	6	18

Race/ethnicity. This is a required table. Estimate the racial and ethnic composition of the families to be served by the FSS program.

-

Race and Ethnicity of Population to be Served (required)

<u>Race / Ethnicity</u>				
White	61	4	3	3
African-American	375	72	4	20
Asian	1	0	0	0
American Indian	0	0	0	0
Native American	0	0	0	0
Hispanic	6	2	0	0
Non-Hispanic	430	74	7	23

III.B – Supportive Services Needs

Instructions: Describe in this section the supportive service needs of the families you expect to participate in your FSS program. The sample text provides illustrations of needs to consider. Feel free to adjust this list to reflect the needs you identify. Then indicate how you identified the supportive services needs by checking one or more of the boxes and/or adding your own explanation.

Note: 24 CFR § 984.201(d)(1) specifies that FSS Action Plans must include “Family demographics. A description of the number, size, characteristics, and other demographics (including racial and ethnic data), and **the supportive service needs of the families expected to participate in the FSS program**” The characteristics other than supportive service needs are covered above, in Section III.A and the size of the program is covered in Section III.C.

Supportive Services Needs of Families Expected to Participate in FSS

The following is a list of the supportive service needs of the families expected to enroll in the *Housing Authority of Newnan* FSS program:

- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerated basic skills instruction
- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for childcare
- Transportation assistance
- Financial coaching, including assistance with budgeting, banking, credit, debt, and savings
- Access to counseling or treatment for substance abuse and mental health
- Dental care, health care, and mental health care including substance abuse treatment/counseling
- Homeownership readiness

This list of supportive services needs is based on the following:

- Experience with past FSS or other supportive service program participants
- Input from the PCC or other service provider partners
- Historical needs assessments completed at program enrollment
- Other: _____

III. C. – Estimate of Participating Families

Instructions: Provide an estimate of the number of eligible families who can reasonably be expected to receive services based on available resources.

If you are funded for FSS coordinator positions, by virtue of that funding, you have a minimum number of participants to be served each year. Be sure that your Estimate of Participating Families is at a minimum, the number of participants required by your funding.

Note that if you have not yet fulfilled your Mandatory Program size requirement, your Estimate of Participating Families must be at least the minimum program size required for your agency. For more information, see 24 CFR §984.105 and FSS Guidebook Section 6.6 Minimum FSS Program Size).

Estimating Participating Families

You must describe how many families you expect your FSS program will be able to serve at a time and then estimate how many families your program will serve over a five-year period. The sample text includes different options for existing and new programs.

If you are operating an *existing program*, you should use your records to identify how many families enroll per year and add five years of new enrollment to the typical program size to estimate how many families you will serve over five years.

If you are starting a *new program*, you will need to adopt some assumptions about graduation and attrition for other reasons. For example, assume an FSS program has a capacity of 100 families and expects to operate at capacity at all times. If the program expects 50 of those families to graduate in five years (with some families getting an extension) and 10

Estimate of Participating Families

Over time, **Housing Authority of Newnan** hopes to serve all families who are interested in participating in the FSS Program. The number of spaces available in the program at any given time, however, will be limited by the program's resources, including the number of FSS coordinators funded to work with FSS participants. New families will be admitted to the FSS program as space permits.

In recent years, the **Housing Authority of Newnan** has been funded for **two** coordinators. The minimum number of participants required to be served based on this funding is **75**.

Historically, **Housing Authority of Newnan's** FSS program has enrolled **approximately five to ten** new families into the FSS program each year.

Accordingly, **Housing Authority of Newnan** expects to be able to provide FSS Services to 125 families over a five-year period.

Therefore, as of the time of preparation of this Action Plan, the **Housing Authority of Newnan** expects to be able to serve **100** families in the FSS program at any one time.

In the last five years, 14 participants have graduated the FSS program. We anticipate 20 participants to graduate the program within the next five year.

families to leave the program each year for other reasons, the expected number of families to be served in the first five years is 200 (100 + 50 new enrollees who replace graduates + 50 new enrollees who replace families who leave for other reasons.)

Note that the number of families your FSS program expects to serve is different from the minimum number of families that your FSS program is required to serve under the terms of the Notice of Funding Opportunity that allocated the funds. FSS programs are encouraged to enroll more than the minimum number of families, so long as this is possible without compromising your program's quality.

If your agency is a PHA with an FSS mandate, you should include the text indicated in the right-hand column and complete the table.

In accordance with CFR §984.105(c), if the Estimate of Participating Families is smaller than the Minimum Program Size, indicate if you have an exception granted by HUD to run a program smaller than the mandate and when that exception expires.

III. D – Other Self-Sufficiency Programs

Instructions: If you expect families from another self-sufficiency program to enroll in your FSS program, provide estimates of the numbers of these families.

For PHAs: If you seek to enroll families in the FSS program that are nearing the end of their eligibility for the Jobs Plus Earned Income Disregard as a way to continue to serve these families, you may wish to describe this approach in this section.

Other Self-Sufficiency programs

Option 1:

The Housing Authority of Newnan expects to enroll into FSS families from the self-sufficiency programs checked in the table below.

The sample Action Plan text includes two options – one for FSS programs that expect to enroll families from other self-sufficiency programs and one for FSS programs that do not. Choose the option that best fits your program. If you choose Option 1, check the applicable boxes to indicate which programs are included and, if you have an estimate in mind, indicate the number of families from that program you expect to enroll.

For more information, see 24 CFR §984.201(d)(3) and FSS Guidebook section 2.2 Outreach and Enrollment.

Name of Program	Check box if applicable	Number of Families each year
Family Unification Program - Family	<input checked="" type="checkbox"/>	10
Family Unification Program – Youth (FUP-Y)	<input checked="" type="checkbox"/>	1
Foster Youth Initiative (FYI)	<input type="checkbox"/>	N/A
Resident Opportunity and Self-Sufficiency (ROSS)	<input checked="" type="checkbox"/>	5
Jobs Plus	<input type="checkbox"/>	N/A
Emergency Housing Voucher (EHV)	<input type="checkbox"/>	N/A
Veterans Affairs Supportive Housing (VASH)		N/A
Other: Mainstream	<input checked="" type="checkbox"/>	10

Option 2:

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

IV. Family Selection Procedures

Instructions: Describe your policies and procedures for selecting FSS participants, including whether your FSS program will offer a preference to prospective participants who are already enrolled in, or on the waiting list for, FSS-related service programs and whether your FSS program plans to screen prospective participants for motivation to participate. (Note that motivation is

Family Selection Procedures

A. Waiting List

A waiting list will be maintained for families whose applications cannot be accepted at the time of initial application due to program capacity limits. The waiting list will include the name and contact information for the head of household of the applicant family and the date and time of their application.

B. Admissions Preferences

the only allowable screening criteria to include).

Note: The maximum number of FSS slots with a selection preference is limited to 50% of the total number of FSS slots.

For any preference your program selects, you must provide the following:

1. Percentage of slots for which your program will give the selection preference
2. If applicable, the FSS related service programs to which your program will give a selection preference
3. The method of outreach to, and selection of, families with one or more members participating in the identified programs
4. How families with the applicable preferences will be selected from the wait list: (a) date and time of application; or (b) a drawing or other random choice technique.

(see 24 CFR 984.203 and FSS Guidebook Section 2.2 Outreach and Enrollment)

Policy Decisions: In completing this section, you will need to make the following policy decisions:

Option 1: No preference:

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

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

1. Whether to allow selection preferences. If so, (a) what selection preferences, (b) outreach methods, and (c) selection methods. Start by indicating whether you will utilize any selection preferences by selecting the appropriate option. Then complete the table applicable to that option.

The “% of FSS slots” is a percentage of the whole anticipated program size, as established in III.C (above)
2. Whether to include a screening for motivation. If so (a) what the screening will entail, and (b) how the FSS program will ensure reasonable accommodations to avoid discrimination. Select the appropriate option.
3. What families or family members may re-enroll in the FSS program following exit from the program and under what circumstances.
4. What process to follow for documenting the family’s choice of Head of FSS Family.

Note: Your FSS program may use motivational screening factors to screen families interested in participating in the FSS program. You may use these factors to

Option 2: One or more selection preference(s):

The FSS program will provide a preference for families who meet each of the preference types identified by a checkmark in the following table. The table shows the percent of FSS slots to which the preference applies, and the outreach and selection methods that will be applied to identify and select the households within each preference category.

Check if Applicable	Preference Type	% of FSS Slots	Outreach Method(s)	Identify Selection Method (these are the only two options for selection within a preference, per 24 CFR 984.203(b))
<input type="checkbox"/>	Families already in the following FSS-related service program(s): <i>[specify]</i>			<input type="checkbox"/> Date and time of application to the FSS Program <input type="checkbox"/> A drawing or other random choice technique
<input type="checkbox"/>	Families Porting in			<input type="checkbox"/> Date and time of application to the FSS Program <input type="checkbox"/> A drawing or other random choice technique
<input type="checkbox"/>	FUP-Y/FYI Families that want to take advantage of the Fostering Stable Housing Opportunities (FSHO) Initiative			<input type="checkbox"/> Date and time of application to the FSS Program <input type="checkbox"/> A drawing or other random choice technique
<input type="checkbox"/>	Other Preference:			<input type="checkbox"/> Date and time of application to the FSS Program <input type="checkbox"/> A drawing or other random choice technique

measure a family's interest and motivation to participate in the FSS program.

(see 24 CFR 984.203 and FSS Guidebook Section 2.2 Outreach and Enrollment)

Note: This section includes a required statement affirming that the organization will not engage in unlawful discrimination.

C. Screening for motivation.

Option 1: The *Housing Authority of Newnan* will not use any motivational screening factors to measure a family's interest and motivation to participate in the FSS program.

Option 2: The *Housing Authority of Newnan* will use one or more motivational screening factors to measure the family's interest and motivation to participate in the FSS program. The following screening criteria will be used:

Orientation Session: The *Housing Authority of Newnan* will screen families for motivation to participate in the FSS program by requiring that families who apply to enroll in the FSS program attend an initial orientation session. Each family will be given two opportunities to attend the orientation session and may request accommodation if unable to attend a scheduled orientation session. Accommodations will be offered on a case-by-case basis, depending on the needs of the applicant. Accommodations may include an individually scheduled orientation session, translation services, an alternative location, a virtual orientation session, or allowance and encouragement to bring children to the session, where possible.

Other Screening Criteria: *[specify here]*

D. Compliance with nondiscrimination policies

It is the policy of *Housing Authority of Newnan* to comply with all Federal, State, and local nondiscrimination laws and regulations, including but not limited to the Fair Housing Act, the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the grounds of race, color, sex, religion, national or ethnic origin, family status, source of income, disability or perceived gender identity and sexual orientation. In addition, *Housing Authority of Newnan's* FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).

The FSS program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS coordinators will review the file in the staff review meeting to ensure that non-selection is not based on discriminatory factors before the final decision is made. Applicants will be notified in writing of the reason(s) they were not selected for participation and will have the opportunity to appeal the decision (see Hearing Procedures). At all times, *Housing Authority of Newnan* will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

E. Re-enrollment of prior FSS participants

The following previous FSS families will be allowed to re-enroll in *the Housing Authority of Newnan's* FSS program no less than one year from FSS graduation/exit:

- FSS program graduates
- FSS participants who have withdrawn voluntarily
- Families involuntarily terminated due to non-participation

The following conditions apply to re-enrollment:

F. Head of FSS Family

The head of the FSS family is designated by the participating family. The *Housing Authority of Newnan* may make itself available to consult with families on this decision but it is the assisted household that chooses the head of FSS family that is most suitable for their individual household circumstances. The designation or any changes by the household to the Head of FSS Family must be submitted to the Housing Authority of Newnan in writing only.

V. Outreach

<p>Instructions: Describe the planned notification and outreach efforts by your FSS program to recruit FSS participants from among eligible families and to provide FSS information to minority and non-minority families.</p> <p>The sample Action Plan lists a number of typical outreach methods. Check the ones that apply to your program and provide details about how you will implement each method, including how often.</p> <p>You should feel free to modify this section to reflect your program’s outreach strategy. However, it is recommended that you retain the note at the end of this section which affirms that outreach will comply with all applicable fair housing protections.</p> <p>(see 24 CFR 984.201(c)6 and FSS Guidebook Section 2.2 Outreach and Enrollment)</p>	<p>Outreach</p> <p>The <i>Housing Authority of Newnan</i> will conduct widespread outreach to encourage enrollment in the FSS program. Outreach efforts will include the activities identified through the methods listed below: Interpreters will be used as needed and clients may contact staff to express interest in person, via our toll-free telephone number or by email.</p> <table border="1" data-bbox="682 500 1890 971"> <thead> <tr> <th data-bbox="682 500 1297 548">Outreach Methods</th> <th data-bbox="1297 500 1890 548">Details, including frequency</th> </tr> </thead> <tbody> <tr> <td data-bbox="682 548 1297 683"> <ul style="list-style-type: none"> Posting information about FSS on the <i>Housing Authority of Newnan</i>’s website and social media. </td> <td data-bbox="1297 548 1890 683"> Dedicated information section with a summary detailing FSS services under the Residents section of our website and on Resident Services Facebook Page. </td> </tr> <tr> <td data-bbox="682 683 1297 768"> <ul style="list-style-type: none"> Posting FSS program flyers in locations likely to be seen by eligible families </td> <td data-bbox="1297 683 1890 768"> FSS Flyers in the lobby of main office and property management offices. </td> </tr> <tr> <td data-bbox="682 768 1297 873"> <ul style="list-style-type: none"> Providing information about the FSS program during scheduled reexaminations </td> <td data-bbox="1297 768 1890 873"> Property Managers provide FSS informational flyer at initial intake and reexamination appointments. </td> </tr> <tr> <td data-bbox="682 873 1297 971"> <ul style="list-style-type: none"> Holding well-publicized information sessions about FSS </td> <td data-bbox="1297 873 1890 971"> FSS information and orientation sessions are well publicized by being included in mailers to residents. </td> </tr> </tbody> </table> <p>Outreach informational material about the FSS Program will include information about:</p> <ul style="list-style-type: none"> Program overview Program benefits Available resources Participant responsibilities Program outcomes <p>Outreach efforts will be targeted equally to all families, using materials in both English and other commonly spoken languages to ensure that non-English and limited English-speaking families receive information and have the opportunity to participate in the FSS Program. In conducting outreach, the <i>Housing Authority of Newnan</i> will account for the needs of person with disabilities, including persons with impaired vision, hearing or mobility, and provide effective communications to ensure that all eligible who wish to participate are able to do so.</p>	Outreach Methods	Details, including frequency	<ul style="list-style-type: none"> Posting information about FSS on the <i>Housing Authority of Newnan</i>’s website and social media. 	Dedicated information section with a summary detailing FSS services under the Residents section of our website and on Resident Services Facebook Page.	<ul style="list-style-type: none"> Posting FSS program flyers in locations likely to be seen by eligible families 	FSS Flyers in the lobby of main office and property management offices.	<ul style="list-style-type: none"> Providing information about the FSS program during scheduled reexaminations 	Property Managers provide FSS informational flyer at initial intake and reexamination appointments.	<ul style="list-style-type: none"> Holding well-publicized information sessions about FSS 	FSS information and orientation sessions are well publicized by being included in mailers to residents.
Outreach Methods	Details, including frequency										
<ul style="list-style-type: none"> Posting information about FSS on the <i>Housing Authority of Newnan</i>’s website and social media. 	Dedicated information section with a summary detailing FSS services under the Residents section of our website and on Resident Services Facebook Page.										
<ul style="list-style-type: none"> Posting FSS program flyers in locations likely to be seen by eligible families 	FSS Flyers in the lobby of main office and property management offices.										
<ul style="list-style-type: none"> Providing information about the FSS program during scheduled reexaminations 	Property Managers provide FSS informational flyer at initial intake and reexamination appointments.										
<ul style="list-style-type: none"> Holding well-publicized information sessions about FSS 	FSS information and orientation sessions are well publicized by being included in mailers to residents.										

VI. MTE FSS GOAL REWARDS Program and Other Incentives for Participants

Instructions: Describe your FSS program's policies regarding the Goal Rewards Program, as well as any other incentives that you intend to offer eligible families to encourage participation in the FSS program.

The sample text covers key issues related to escrow program administration, including interim

FSS Escrow Account and Other Incentives for Participants

- HAN will replace the Family Self-Sufficiency (FSS) escrow model with a Goal Rewards Model. In the proposed model, participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives can immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will receive the incentive immediately via disburse check at the time the goal is completed. At this time, increases in income will not be recorded and will not contribute to increases in escrow. There will be incentives based on maintaining and earning income, however they will not be directly tied to increases in income from start of program. Key policies and procedures applicable to the FSS Goal Rewards Program, as well as any additional incentives offered by the *Housing Authority of Newnan*, are described below.

A. Additional Incentives

disbursements. While FSS programs are not required to offer interim disbursements, HUD encourages FSS programs to do so as a way of helping families stay on track toward their goals.

(see 24 CFR 984.305 and FSS Guidebook Section 2.2 Outreach and Enrollment for information on incentives. See 24 CFR 984.305(c)2 and 24 CFR 984.305(f)2 respectively for regulations relating to interim disbursement of escrow funds and information relating to forfeited escrow funds and FSS Guidebook Section 5.2 The FSS Escrow Account.)

Policy Decisions: In completing this section, you will need to make the following policy decisions:

1. Whether to provide financial incentives to FSS participants (in addition to the escrow account), and, if so, what incentives to provide under what conditions. (Select the appropriate option.)
2. Whether to allow interim disbursements of escrow savings. If so: (a) under what conditions will interim disbursements be permitted (including restrictions on interim disbursements, if any), and (b) what your programs procedures for applying for and

Option 1. While the *Housing Authority of Newnan*'s FSS program does not provide any other financial incentives for FSS participants, it does provide coaching services, as well as referrals to other service providers, that can be very valuable for FSS program participants.

Option 2. The *Housing Authority of Newnan*'s FSS program provides the following incentives to FSS participants in addition to the FSS escrow account:

B. Goal Rewards Model

Option 1: In the Goal Rewards Model, participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives can immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will receive the incentive immediately via disburse check at the time the goal is completed.

Participants will have the opportunity to start an individual savings account managed by an accredited financial institution. Participants who elect this incentive will be able to FSS Family must be actively participating with case management. Requests may be made verbal in writing. Requests may be made through the term of the Contract of Participation. Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment. A determination of whether the family qualifies for the requested interim disbursement will be made on a case-by-case basis by the FSS Coordinator and an administrative staff representative of the *Housing Authority of Newnan*.

Option 2: The *Housing Authority of Newnan* will allow for interim disbursements subject to certain specified limitations:

Families may request an interim disbursement from the household's contribution in the ISA once the FSS family has fulfilled at least one interim goal in order to pay for specific goods or services that will help the family make progress toward achieving the goals in its Individual Training and Services Plan (ITSP). Requests may be made verbally or in writing. Requests may be made through the term of the Contract of Participation. Examples of potentially eligible activities include, but are not limited to, payments for post-secondary education, job training, credit repair, small business start-up costs, job start-up expenses, and transportation to/from a place of employment. Certainly guidelines / limitations apply to interim disbursement requests, as noted in the table below. The FSS Coordinator and an administrative

<p>approving interim disbursements will be. (Three options have been provided. If you select the second option, indicate what guidelines apply to specific expenditure types.)</p> <p>In your policy, be sure to include</p> <ul style="list-style-type: none"> • how a request is made • by whom • any limitations on when a request may be made • eligible activities • how the request will be reviewed/who will make the determination <p>3. What are the eligible uses of forfeited escrow funds? (Check the uses that apply to your FSS program.)</p> <p>In your policy, be sure to include</p> <ul style="list-style-type: none"> • how a request is made • by whom • any limitations on when a request may be made • eligible activities • how the request will be reviewed/who will make the determination <p>4.)</p>	<p>staff representative of the <i>Housing Authority of Newnan</i> will consider requests for interim disbursement in light of these policies and applicable federal requirements.</p> <p>Specific guidelines / limitations apply to interim disbursement requests for the expenditure types checked in the box below.</p> <table border="1"> <thead> <tr> <th data-bbox="680 391 1010 440">Expenditure Type</th> <th data-bbox="1016 391 1892 440">Guidelines / Limitations</th> </tr> </thead> <tbody> <tr> <td data-bbox="680 444 1010 821"> <input type="checkbox"/> Debt repayment </td> <td data-bbox="1016 444 1892 821"> <input type="checkbox"/> Interim disbursements will be allowed for repayment of debt incurred prior to starting the FSS program, but not for debt incurred afterwards <input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> An interim disbursement for debt repayment may not exceed x% of the participant's escrow savings. <input type="checkbox"/> Other: <input type="checkbox"/> Interim disbursements will not be allowed for debt repayment </td> </tr> <tr> <td data-bbox="680 826 1010 1416"> <input type="checkbox"/> Car purchase </td> <td data-bbox="1016 826 1892 1416"> <input type="checkbox"/> Families interested in using an interim disbursement to purchase a car must first ask the PHA for a referral to [add partner name] that provides discounted cars. <input type="checkbox"/> The maximum interim disbursement that will be allowed for a car purchase is: [add] <input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> The terms of any car purchase or car loan will be carefully scrutinized to ensure the terms are reasonable. <input type="checkbox"/> Head of FSS Household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle. <input type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other: [specify] <input type="checkbox"/> Interim disbursements will not be allowed for car purchase. </td> </tr> </tbody> </table>	Expenditure Type	Guidelines / Limitations	<input type="checkbox"/> Debt repayment	<input type="checkbox"/> Interim disbursements will be allowed for repayment of debt incurred prior to starting the FSS program, but not for debt incurred afterwards <input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> An interim disbursement for debt repayment may not exceed x% of the participant's escrow savings. <input type="checkbox"/> Other: <input type="checkbox"/> Interim disbursements will not be allowed for debt repayment	<input type="checkbox"/> Car purchase	<input type="checkbox"/> Families interested in using an interim disbursement to purchase a car must first ask the PHA for a referral to [add partner name] that provides discounted cars. <input type="checkbox"/> The maximum interim disbursement that will be allowed for a car purchase is: [add] <input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> The terms of any car purchase or car loan will be carefully scrutinized to ensure the terms are reasonable. <input type="checkbox"/> Head of FSS Household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle. <input type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other: [specify] <input type="checkbox"/> Interim disbursements will not be allowed for car purchase.
Expenditure Type	Guidelines / Limitations						
<input type="checkbox"/> Debt repayment	<input type="checkbox"/> Interim disbursements will be allowed for repayment of debt incurred prior to starting the FSS program, but not for debt incurred afterwards <input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> An interim disbursement for debt repayment may not exceed x% of the participant's escrow savings. <input type="checkbox"/> Other: <input type="checkbox"/> Interim disbursements will not be allowed for debt repayment						
<input type="checkbox"/> Car purchase	<input type="checkbox"/> Families interested in using an interim disbursement to purchase a car must first ask the PHA for a referral to [add partner name] that provides discounted cars. <input type="checkbox"/> The maximum interim disbursement that will be allowed for a car purchase is: [add] <input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> The terms of any car purchase or car loan will be carefully scrutinized to ensure the terms are reasonable. <input type="checkbox"/> Head of FSS Household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle. <input type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other: [specify] <input type="checkbox"/> Interim disbursements will not be allowed for car purchase.						

<input type="checkbox"/> [Add category]	
<input type="checkbox"/> [Add category]	
<p><input type="checkbox"/> Option 3: The <i>Housing Authority of Newnan</i> will not allow for interim disbursements.</p> <p><i>C. Uses of forfeited escrow funds.</i></p> <p><input type="checkbox"/> Option 1: Forfeited funds from HA contribution of ISA remaining from terminated participants will be collected in a general fund and may be disbursed evenly among participants in good standing on a regular basis.</p> <p><input checked="" type="checkbox"/> Option 2: Treatment of forfeited FSS escrow account funds. FSS ISA funds forfeited by the FSS family (if any) will be used to support FSS participants in good standing. Upon written request from a family, the FSS Coordinator will consider the available funds and make a determination.</p> <p>The <i>Housing Authority of Newnan</i> may also initiate a request for the use of forfeited escrow funds.</p> <p><i>Select one of the following options regarding interim disbursements:</i></p> <p><input checked="" type="checkbox"/> Option 1: At the discretion of the FSS coordinator, forfeited ISA funds may be considered in lieu of a disbursement.</p> <p><input type="checkbox"/> Option 2: Forfeited escrow funds may not be considered as a substitute for an interim escrow disbursement.</p> <p><input type="checkbox"/> Option 3: Other: [specify]</p>	

Complete the sections below.

Forfeited FSS household contribution of ISA funds may be deployed:

- Any time during the term of a household's CoP
- Within [###] days of CoP execution
- No more than [###] days prior to the scheduled expiration of CoP

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

- [The Housing Authority of Newnan]***
- Head of the FSS family
- Non-head FSS family members

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

Eligible Uses	Guidelines / Limitations
<input type="checkbox"/> Purchasing a vehicle	<ul style="list-style-type: none"><input type="checkbox"/> Families interested in using a forfeited funds to purchase a vehicle must first receive a referral to <i>[add partner name]</i> that provides discounted vehicles.<input type="checkbox"/> The maximum forfeited escrow fund amount that will be allowed for a vehicle purchase is: <i>[add]</i><input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach

	<input type="checkbox"/> The terms of any vehicle purchase or vehicle loan will be carefully scrutinized to ensure the terms are reasonable. <input type="checkbox"/> Head of FSS Household must submit a budget that includes the ability to cover insurance, gas and savings for maintenance and repair of the vehicle. <input type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other: <i>[specify]</i>
<input checked="" type="checkbox"/> Child Care	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other: <i>[specify]</i>
<input checked="" type="checkbox"/> Training for participants	<input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other: <i>[specify (e.g., categories of training permitted)]</i>
<input checked="" type="checkbox"/> Employment or Educational Costs, including: <input checked="" type="checkbox"/> Employment training <input checked="" type="checkbox"/> Employment preparation (e.g., interview training, professional clothing, etc.) <input checked="" type="checkbox"/> Education costs (books, fees, uniforms, tools, etc.)	<input type="checkbox"/> Head of FSS Household must be engaged in financial coaching and this request must have the support of their financial coach <input type="checkbox"/> Household member receiving funding support must be engaged in financial coaching and this request must have the support of their financial coach <input checked="" type="checkbox"/> Requests will be considered on a case-by-case basis <input type="checkbox"/> Other: <i>[specify]</i>
<input checked="" type="checkbox"/> Training for FSS Program staff	<input type="checkbox"/> Requests for funding must be approached by <i>[entity (e.g., the PCC)]</i> <input checked="" type="checkbox"/> Other: <i>[Per approval by Executive Director]</i>
<input checked="" type="checkbox"/> Other:	<input type="checkbox"/> <i>[Other needs identified and approved by FSS Coordinator]</i>

VII. Family Activities and Supportive Services

<p>Instructions: Describe the activities and supportive services to be provided to FSS families by both public and private providers and identify the public and private resources which are expected to provide the supportive services.</p> <p>(see FSS Guidebook Section 3.3 Referrals to Service Providers)</p> <p>Check the categories of services and the specific services that your program plans to make available to families through referrals and indicate the source or partner for that service.</p> <p>The sample Action Plan describes the coaching/case management services provided to families in the next Section.</p>	<p>Family Activities and Supportive Services</p> <p>As described in the next section, all families participating in the FSS program will benefit from coaching that helps them identify and achieve goals that the family selects. Drawing on partners on the program coordinating committee and relationships with other service providers, the coaches will provide referrals as needed to help FSS participants access appropriate services to help them achieve their goals:</p>		
	<p>Supportive Service Category</p>	<p>Specific Service</p>	<p>Source/Partner</p>
	<p><input type="checkbox"/> Assessment</p>	<p><input type="checkbox"/> Vocational Assessment Educational</p> <p><input type="checkbox"/> Assessment Disability Assessment</p> <p><input type="checkbox"/> Disability Other specialized assessments</p>	
	<p><input checked="" type="checkbox"/> Child Care</p>	<p><input checked="" type="checkbox"/> Infant Care / Toddler Care Preschool Care</p> <p><input checked="" type="checkbox"/> Afterschool Care</p> <p><input checked="" type="checkbox"/> Homework Assistance</p>	<p>Community Action For Improvement</p>
	<p><input type="checkbox"/> Transportation</p>	<p><input type="checkbox"/> Bus passes</p> <p><input type="checkbox"/> Assistance with car repairs</p> <p><input type="checkbox"/> Assistance with car purchase</p>	
<p><input checked="" type="checkbox"/> Education</p>	<p><input checked="" type="checkbox"/> High School Equivalency/GED</p> <p><input checked="" type="checkbox"/> English as a Second Language</p> <p><input checked="" type="checkbox"/> Post-secondary certificates</p> <p><input checked="" type="checkbox"/> Advanced Degrees</p>	<p>West Georgia Technical College</p>	

	<input checked="" type="checkbox"/> Skills Training	<input type="checkbox"/> Training in Executive Function <input checked="" type="checkbox"/> Basic Skills Training <input checked="" type="checkbox"/> Emerging Technologies Training <input checked="" type="checkbox"/> Biomedical Training (including CNA, phlebotomy, x-ray and other tech, etc.) <input checked="" type="checkbox"/> On-the-Job Training <input type="checkbox"/> Apprenticeships <input checked="" type="checkbox"/> Skilled Labor training	Goodwill Career Center
	<input checked="" type="checkbox"/> Job Search Assistance	<input checked="" type="checkbox"/> Resume Preparation <input checked="" type="checkbox"/> Interviewing Skills <input checked="" type="checkbox"/> Dress for Success <input checked="" type="checkbox"/> Workplace Skills <input checked="" type="checkbox"/> Job Development <input checked="" type="checkbox"/> Job Placement	Goodwill Career Center
	<input type="checkbox"/> Micro and Small Business Development	<input type="checkbox"/> Small business development services <input type="checkbox"/> Small business Mentoring <input type="checkbox"/> Entrepreneurship Training	
	<input checked="" type="checkbox"/> Health/Mental Health Care	<input checked="" type="checkbox"/> Alcohol and Drug Abuse Prevention <input checked="" type="checkbox"/> Alcohol and Drug Abuse Treatment <input type="checkbox"/> Primary care <input type="checkbox"/> Dental services <input checked="" type="checkbox"/> Mental Health Services <input type="checkbox"/> Health Insurance Advising	BYRD House Behavioral Youth Resource Development
	<input checked="" type="checkbox"/> Crisis Services	<input checked="" type="checkbox"/> Crisis Assessment <input checked="" type="checkbox"/> Crisis Intervention <input checked="" type="checkbox"/> Crisis Management <input checked="" type="checkbox"/> Crisis Resolution	BYRD House Behavioral Youth Resource Development Georgia Crisis and Access Line (GCAL) 1-800-715-4225

	<input checked="" type="checkbox"/> Child/Adult Protective Services	<input checked="" type="checkbox"/> Needs Assessment <input checked="" type="checkbox"/> Case Planning <input checked="" type="checkbox"/> Information Referral	Department of Family and Children Services
	<input type="checkbox"/> Household Management	<input type="checkbox"/> Training in Household Management	
	<input checked="" type="checkbox"/> Homeownership Preparation	<input checked="" type="checkbox"/> Homeownership Education <input checked="" type="checkbox"/> Housing Counseling <input checked="" type="checkbox"/> Downpayment Assistance <input checked="" type="checkbox"/> Other Homeownership Assistance	Bank of OZK
	<input checked="" type="checkbox"/> Financial Empowerment	<input checked="" type="checkbox"/> Financial education <input checked="" type="checkbox"/> Financial coaching <input checked="" type="checkbox"/> Banking services <input checked="" type="checkbox"/> Training in money management	
	<input type="checkbox"/> Individual Development Accounts	<input type="checkbox"/> Matched Savings Accounts	
	<input type="checkbox"/> Legal Services	<input type="checkbox"/> Legal Services	
	<input type="checkbox"/> Debt Resolution & Credit Repair	<input type="checkbox"/> Assistance negotiating the resolution of past-due debt	
	<input type="checkbox"/> Other: <i>[identify]</i>		

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

Instructions: Describe how your FSS program will identify the needs of participating families and deliver the appropriate supportive services.

(see FSS Guidebook Section 3.3 Referrals to Service Providers)

Policy Decisions: In completing this section, you will need to make the following policy decisions:

1. What approaches and procedures you will use to identify family needs for support services.
2. How your program will approach coaching or case management (See FSS Guidebook Chapter 3 Case Management/Coaching for recommendations and best practices).
3. Whether to provide services referrals to families who have completed their FSS contracts of participation. (Select the option that applies. See 24 CFR 984.303(e)2 for relevant regulations)

Method of Identifying Family Support Needs and Delivering Appropriate Support Services

A. Identifying Family Support Needs

To help determine the supportive services needs of each family, the FSS coordinator will work with the family to complete an initial informal needs assessment for that family before completion of the initial Individual Training Service Plan (ITSP) and signing of the contract of participation. After enrollment in the FSS program, the FSS coordinator may make referrals to partner agencies for completion of one or more formal needs assessments. These assessments may focus on such issues as: employment readiness and employment training needs, educational needs related to secondary and post-secondary education, financial health, and other topics, depending on the needs and interests of the family.

The formal assessments may lead to adjustments to the Individual Training Service Plan, if requested by the family.

B. Delivering Appropriate Support Services

Coaching. All families who participate in the FSS program will be assigned an FSS coordinator who will provide coaching services to help each participating family to:

- Understand the benefits of participating in the FSS program and how the program can help the family achieve its goals.
- Identify achievable, but challenging interim and final goals for participation in the FSS program, break down the goals into achievable steps and accompany the family through the process.
- Identify existing family strengths and skills.
- Understand the needs that the family has for services and supports that may help the family make progress toward their goals.
- Access services available in the community through referral to appropriate service providers.

	<ul style="list-style-type: none"> • Overcome obstacles in the way of achieving a family’s goals. <p>C. Transitional supportive service assistance.</p> <p><input checked="" type="checkbox"/> Option 1: Families that have completed their CoP and remain in assisted housing may request assistance with referrals to service providers in order to continue their progress toward economic security. Subject to limitations on staff capacity, <i>[The Housing Authority of Newnan]</i> will try to help these families with appropriate referrals. The time spent on these referrals will not be covered by funds designated by HUD to support the FSS program.</p> <p><input type="checkbox"/> Option 2: No assistance or referrals will be available to families who have completed their CoP contracts.</p>
--	--

IX. Contract of Participation

<p>Instructions: You are not required by regulation to include a section on the Contract of Participation (CoP) in the FSS Action Plan. However, such a section may help you explain to readers what the Contract is and how your program will implement it.</p> <p>In addition, the sample Action Plan addresses in this section several of the policies referenced under “optional additional information” in 24 CFR 984.201(d)(13) the FSS Rule.</p> <p>(see 24 CFR 984.103 (CoP Effective date), 24 CFR 984.303(c) (Term of CoP),</p>	<p>Contract of Participation</p> <p>All families enrolled in the FSS program will be required to sign a Contract of Participation (CoP) that includes an Individual Training and Services Plan (ITSP). This section describes the contents of the CoP and the <i>Housing Authority of Newnan’s</i> policies and practices regarding the CoP.</p> <p>A. Form and content of contract</p> <p>The CoP, which will incorporate one ITSP for each participating member of the family, sets forth the principal terms and conditions governing participation in the FSS program. These include the rights and responsibilities of the FSS family and of the <i>Housing Authority of Newnan</i>, the services to be provided to, and the activities to be completed by, each adult member of the FSS family who elects to participate in the program.</p>
--	--

<p>24 CFR 984.303(d) (Extensions of CoP),</p> <p>24 CFR 984.303(f) (Modification of the CoP),</p> <p>24 CFR 984.303(g) (Completion of the CoP) and</p> <p>24 CFR 984.304(d) (Contract of Participation Extension).</p> <p>Policy Decisions: In completing this section, you will need to make the following policy decisions:</p> <ol style="list-style-type: none"> 1. Whether and under what circumstances to grant extensions of FSS CoPs. 2. Acceptable methods for documenting completion of CoPs. (Select the appropriate option.) 3. Timing limitations (if any) on when participants may modify their ITSPs. (Select the appropriate option.) 4. Policies on the consequences of non-compliance with the terms of the CoP. 	<p>B. ITSP goals</p> <p>Each individual’s ITSP will establish specific interim and final goals by which the <i>Housing Authority of Newnan</i> and the family will measure the family’s progress towards fulfilling its obligations under the CoP. For any FSS family that is a recipient of welfare assistance at the outset of the CoP or that receives welfare assistance while in the FSS program, the <i>Housing Authority of Newnan</i> will establish as a final goal that every member of the family become independent from welfare assistance before the expiration of the CoP. The ITSP of the head of FSS family will also include as a final goal that they seek and maintain suitable employment. The FSS coordinator will work with each participating individual to identify additional ITSP goals that are relevant, feasible and desirable. Any such additional goals will be realistic and individualized.</p> <p>C. Determination of suitable employment</p> <p>As defined in the FSS regulations (24 CFR 984.303(4)(iii)), a determination of what constitutes “suitable employment” for each family member with a goal of seeking and maintaining it will be made by the <i>Housing Authority of Newnan</i>, with the agreement of the affected participant, based on the skills, education, job training and receipt of other benefits of the family member and based on the available job opportunities within the community.</p> <p>D. Contract of Participation term and extensions</p> <p>The CoP will go into effect on the first day of the month following the execution of the CoP. The initial term of the CoP will run the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. Families may request up to two one-year extensions and are required to submit a written request that documents the need for the extension. <i>Housing Authority of Newnan</i> will grant the extension if it finds that good cause exists to do so. In this context, good cause means:</p>
---	--

- (i) Circumstances beyond the control of the FSS family, as determined by the ***Housing Authority of Newnan***, 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 ***Housing Authority of Newnan*** or
- (iii) Any other circumstances that the ***Housing Authority of Newnan*** determines warrants an extension, including

E. Completion of the contract

The CoP is completed, and a family’s participation in the FSS program is concluded when the FSS family has fulfilled all its obligations under the CoP, including all family members’ ITSPs, on or before the expiration of the contract term. The family must provide appropriate documentation that each of the ITSP goals has been completed. The ***Housing Authority of Newnan*** will accept the following form of verification for completion of the ITSP goals:

Option 1: The ***Housing Authority of Newnan*** will accept self-certification to document completion of ITSP goals.

Option 2: The ***Housing Authority of Newnan*** will require third party verification to document completion of ITSP goals.

Option 3: The ***Housing Authority of Newnan*** will require a combination of self-certification and third-party verification to document completion of ITSP goals.

F. Modification

The **Housing Authority of Newnan** and the FSS family may mutually agree to modify the CoP with respect to the ITSP and/or the contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by the **Housing Authority of Newnan** as well as the Head of FSS Family.

The **Housing Authority of Newnan** will allow for modifications to the CoP under the following circumstances:

[Select all that apply]

When the modifications to the ITSP improve the participant’s ability to complete their obligations in the CoP or progress toward economic self-sufficiency

When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, after consultation with the **Housing Authority of Newnan**, designate another family member to be the FSS head of family

When a relocating family is entering the FSS program of a receiving **PHA** and the start date of the CoP must be changed to reflect the date the new CoP is signed with the receiving **PHA**

Other: [specify]

Option 1: The **Housing Authority of Newnan** will allow modifications at any time during the term of the CoP

Option 2: The **Housing Authority of Newnan** will not allow modifications if the CoP is within [fill in] days from the end of the term.

Option 3: The **Housing Authority of Newnan** will not allow modifications of the CoP.

	<p>G. Consequences of noncompliance with the contract</p> <p>Participant non-compliance with the CoP may result in termination from the FSS program. See policies on Involuntary Termination in Section X(A).</p>
--	--

X. Program Termination, Withholding of Services, and Available Grievance Procedures

<p>Instructions: Describe your FSS program’s policies for terminating or withholding supportive services or FSS participation for failure to comply with the Contract of Participation. Include a description of the grievance and hearing procedures available to FSS families.</p> <p>(See 24 CFR 984.201(d)(9) and FSS Guidebook Section 2.3 Contract of Participation and Individual Training and Services Plan)</p> <p>Policy Decisions: In completing this section, you will need to make the following policy decisions:</p> <ol style="list-style-type: none"> 1. Your FSS program’s approaches and procedures assessing and executing involuntary termination from the FSS program. 2. Your FSS program’s policy on voluntary terminations. 	<p>Program Termination</p> <p>A. Involuntary Termination</p> <p>The <i>Housing Authority of Newnan</i> may involuntarily terminate a family from FSS under the following circumstances:</p> <ol style="list-style-type: none"> I. If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan and related documentation. Non-compliance includes: <ol style="list-style-type: none"> i. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance ii. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities iii. Failure to complete activities and/or goals within the specified time frames; and/or II. If the participant’s housing assistance has been terminated. <p>Participants who fail to meet their obligations under paragraph I above, as determined by an FSS coordinator, will be given the opportunity to attend a required meeting with the FSS Coordinator or assigned <i>Housing Authority of Newnan</i> representative to review the situation. At this meeting, a review of the Contract of Participation, Individual Training and Services Plan, and all related documentation will be conducted, and amendments will be made as necessary (within HUD guidelines) to allow for changes in circumstances. Failure to contact the FSS Coordinator to schedule</p>
--	--

<p>3. Your FSS program's grievance procedures, including timelines, modes of communication, settings, and individuals involved.</p>	<p>this meeting within fourteen (14) days of a written request by the FSS program to set up this a meeting or failure by the FSS Head of Household to attend this meeting without some type of correspondence to clarify the issue(s), may lead to termination from the program. The FSS Coordinator will also attempt to contact the participant via phone, text, in person and/or email prior to the review meeting. Participants who remain out of compliance after this meeting will be subject to termination from the FSS program.</p> <p>If the initial meeting does not resolve the problem, or if the meeting is not requested by the family within the required period, notification of termination will be made to the family by letter stating:</p> <ol style="list-style-type: none"> 1. The specific facts and reasons for termination; 2. A statement informing the family of their right to request an informal hearing and the date by which this request must be received (see <i>Grievance Procedures</i>); 3. A statement informing the family that termination from the FSS program for the reasons stated therein will not result in termination of the family's housing assistance. Failure to request a hearing in writing by the deadline will result in closure of the family's FSS file and all rights to a hearing will be waived. All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. Housing assistance will not be terminated based on non-compliance with the FSS program. The current amount of escrow in the family's escrow account will be included in the letter. <p>B. Voluntary Termination</p> <p>Participants may also be terminated from the FSS program under the following circumstances:</p> <ul style="list-style-type: none"> • Mutual consent of both parties; and/or • The family's withdrawal from the program.
---	--

C. Termination with Escrow Disbursement

In most cases, families whose FSS contracts are terminated will not be entitled to disbursement of their accrued FSS escrowed funds. However, the CoP will be terminated with FSS disbursement when one of the following situations occurs:

- (i) Services that the *Housing Authority of Newnan* and the FSS family have agreed are integral to the FSS family’s advancement towards self-sufficiency are unavailable.
- (ii) The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the *Housing Authority of Newnan* and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family.
- (iii) An FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR §982.353) for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

D. Grievance Procedures

All requests for an informal hearing must be received by *Housing Authority of Newnan* Coordinator within fourteen (14) business days of the date of the FSS termination letter. If a hearing is requested by the FSS family, notification to the family regarding the date, time, and location of the informal hearing will be made by mail.

Persons included in the informal hearing shall include, but not be limited to:

- The FSS head of household;
- The FSS Coordinator; and
- *Housing Authority of Newnan* staff members, other than FSS program staff, serving as the

Hearing Officer All participants have the right to obtain legal representation and provide their witnesses.

The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made in writing within (5) days prior to the hearing date.

[Optional Alternative Text on Grievances for PHAs]: *[PHA Name]*'s PHA Plan details the *[PHA Name]*'s Grievance Procedures (See *[PHA Plan section reference or page number]*).

If the family does not appear at the scheduled time and was unable to reschedule the hearing in advance due to the nature of the emergency, the family must contact the *[organization]* within 24 hours of the scheduled hearing date, excluding weekends and holidays. *[Organization]* will then reschedule the hearing. The Hearing Officer will issue a written decision to the family within ten (10) business days after the hearing. The decision made by the Hearing Officer will be final. The *[organization]* reserves the right to overturn the Hearing Officer's decision only in the event that the decision is contrary to the organization's written policies.

XI. Assurance of Non-Interference

Instructions: Include a statement here that provides an 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.

(see FSS Guidebook Section 1.2 What is FSS and Why is it Important?)

Assurance of Non-Interference

Participation in the FSS Program is voluntary. A family's decision on whether to participate in FSS will have no bearing on the *Housing Authority of Newnan*'s decision of whether to admit the family into the Family Self Sufficiency program. The family's housing assistance will not be terminated based on whether they decide to participate in FSS, their successful completion of the CoP, or on their failure to comply with FSS program requirements.

Housing Authority of Newnan will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.

XII. Timetable

<p>Instructions: Provide a schedule for program implementation and for filling all FSS slots with eligible FSS families.</p> <p>Separate options have been provided for FSS programs that have already started or have not yet started.</p> <p>(see FSS Guidebook Section 2.2 Outreach and Enrollment)</p>	<p>Timetable</p> <p><input checked="" type="checkbox"/> Option 1: <i>Housing Authority of Newnan</i> implemented its FSS program in [year] and will continue to implement it per this FSS Action Plan.</p> <p><input type="checkbox"/> Option 2: <i>Housing Authority of Newnan</i> will be implementing its FSS program in the following timeline: <u>Program Begins</u></p> <p>The FSS program will commence operation as soon as the <i>Housing Authority of Newnan</i> has received notification of HUD’s approval of the Action Plan.</p> <p><u>Program Coordinating Committee</u></p> <p>Within 90 days after the program begins, a Program Coordinating Committee (PCC) will be formed and will begin meeting. The Committee will continue to meet monthly for the next twelve months. Thereafter, meetings will be quarterly. Additional special meetings will occur as needed.</p> <p><u>Outreach</u></p> <p>Within 90 days of program launch, outreach efforts will commence, as described above in the Outreach section.</p> <p><u>Participant Selection</u></p> <p>Candidates who respond to the outreach efforts will be selected in accordance with the selection procedures described above. The first FSS program participants are expected to be enrolled within 120 days of program launch.</p> <p><u>Contract Execution</u></p> <p>Contracts of Participation will be executed with selected participants on a rolling basis. The first Contracts of Participation are expected to be completed within 6 months of program launch.</p>
---	--

	<p><u>Full Enrollment</u> The FSS program expects to reach full capacity within 12 months of program launch. (See discussion above of the number of participants expected to be served. Note that generally for funded programs, the program is required to be serving the minimum number of participants within one year.)</p> <p><u>Program Maintenance</u> The FSS program expects to operate at full capacity thereafter, subject to normal fluctuations related to families leaving and entering the program.</p>
--	---

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

<p>Instructions: Reasonable accommodations and effective communications for persons with disabilities are required by federal law. While there is no specific requirement in the program regulations to describe in the FSS Action Plan the agency’s policy on reasonable accommodations and effective communications, inclusion of this section in the Action Plan can be helpful for reinforcing the commitment of the PHA/owner to these important policies. The sample plan also describes the agency’s commitment to meeting the needs of people with Limited English Proficiency.</p>	<p>Reasonable Accommodations, Effective Communications and Limited English Proficiency Requirements</p> <p>Requests for Reasonable Accommodations</p> <p>A person with disabilities may request reasonable accommodations to facilitate participation in the FSS program. Requests will be considered on a case-by-case basis.</p> <p>Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator’s response, the family may submit a request in writing in accordance with the agency’s reasonable accommodations policy. The policy is available and will be provided upon request.</p> <p>Request for Effective Communications</p> <p>A person with disabilities may request the use of effective communication strategies in order to facilitate participation in the FSS program. Examples include: appropriate auxiliary aids and services, such as interpreters, computer-assisted real time transcription (CART), captioned videos with audible video description, visual alarm devices, a talking thermostat, accessible electronic communications and websites, documents in alternative formats (e.g., Braille, large print), or assistance in reading or completing a form, etc.</p> <p>Requests should be made initially to the FSS coordinator. If a family is not satisfied with the FSS Coordinator’s response, the family may submit a request in writing in accordance with the agency’s effective communications policy. The policy is available and will be provided upon request.</p>
--	---

Limited English Proficiency

The [*Housing Authority of Newnan*] will comply with HUD requirements to conduct oral and written communication related to the FSS program in languages that are understandable to people with Limited English Proficiency. For more information, see the Limited English Proficiency policy available and will be provided upon request.

XIV. Coordination of Services

XIV.A Coordination of Services (PHAs only)

Instructions: Certify that the development of the services and activities scheduled to be provided under the FSS program has been coordinated with public and private providers, including 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. In this certification, you should further specify that implementation will continue to be coordinated with these local public and private providers to avoid duplication of services.

Note: PHAs should include here a description of the Program Coordinating Committee. (This provision does not apply to multifamily owners.)

Coordination of Services

A. Certification of Coordination

Development of the services and activities under the FSS program has been coordinated with programs under title I of the Workforce Innovation and Opportunity Act 29 U.S.C. 3111 et seq., and other relevant employment, child care, transportation, training, education, and financial empowerment programs in the area. Implementation will continue to be coordinated, in order to avoid duplication of services and activities.

B. Program Coordinating Committee

The principal vehicle for ensuring ongoing coordination of services is the program coordinating committee (PCC), which has been established in accordance with FSS regulations to assist in securing commitments of public and private resources for the operation of the FSS Program. Among other responsibilities, the PCC will help the FSS program to identify and build strong referral relationships with providers of supportive services that meet the needs of FSS participants. The PCC will also be consulted in developing program policies and procedures.

XIV.B Coordination of Services (Multifamily owners only)

<p>Instructions: Provide a statement indicating whether there is an existing PCC that serves the area where the property is located.</p> <p>If there is an existing PCC where the property is located, provide a statement indicating whether it is available for you to work with.</p> <p>Note: If your FSS program has made good-faith attempts to reach out to the existing PCC about joining and has received an unfavorable response/no response, then the existing PCC is not considered available.</p> <p>If there is a PCC that is available for your program to work with, provide a statement indicating whether your program will work with the existing PCC or start your own.</p>	<p>Coordination of Services</p> <p><input checked="" type="checkbox"/> [Option 1]</p> <p>The <i>Housing Authority of Newnan's</i> PCC serves the area in which the <i>Housing Authority of Newnan</i> is located and the PCC and the owner have agreed that the PCC will work with the owner to coordinate the provision of services.</p> <p><input type="checkbox"/> [Option 2]</p> <p>The PCC serves the area in which the <i>Housing Authority of Newnan</i> is located but is not available to work with the owner to coordinate the provision of services. The <i>Housing Authority of Newnan</i> will therefore establish its own PCC, as described below.</p> <p><input type="checkbox"/> [Option 3]</p> <p>The PCC serves the area in which the <i>Housing Authority of Newnan</i> is located but is not available to work with the owner to coordinate the provision of services. In lieu of establishing its own PCC, the <i>Housing Authority of Newnan</i> will coordinate services as follows:</p> <p><input type="checkbox"/> [Option 4]</p>
--	---

If there is NO existing PCC that is available for your FSS program to join, provide a statement indicating whether you plan to start your own.

Note: If there is no available PCC, your program is not required to start its own but is encouraged to do so. If you choose not to start a PCC, HUD encourages you to develop an alternative approach allowing you to get regular feedback from service providers and FSS participants.

(See 24 CFR 984.202, and FSS Guidebook Sections 3.3 Referrals to Service Providers and 6.1 Building Partnerships)

Policy Decision:

1. Whether you will use a PCC or an alternative method of coordinating services and how the PCC/coordination process will work.

No existing, available PCC serves the area in which the *Housing Authority of Newnan* is located. The *Housing Authority of Newnan* will therefore establish its own PCC, as described below.

[Option 5]

No existing, available PCC serves the area in which the *Housing Authority of Newnan* is located. In lieu of establishing its own PCC, the *Housing Authority of Newnan* will coordinate services as follows:

Program Coordinating Committee

The principal vehicle for ensuring ongoing coordination of services is the program coordinating committee (PCC), which has been established to assist in securing commitments of public and private resources for the operation of the FSS Program. Among other responsibilities, the PCC will help the FSS program to identify and build strong referral relationships with providers of supportive services that meet the needs of FSS participants. The PCC will also be consulted in developing program policies and procedures.

The PCC will meet *quarterly* and may conduct business on an as-needed basis via email or telephone conferences. The PCC includes the following representatives:

1. One or more FSS Program Coordinators
2. One or more participants from the *Housing Authority of Newnan*
3. Representatives from a variety of agencies and individuals, which include but are not limited to the following:

Public and private sector providers will include, but not limited to:

Department of Family and Children Services
West Central Georgia Workforce Investment Board
Goodwill
Health Department
Coweta Samaritan Clinic
Wells Fargo
Bridging The Gap
Department of Labor
Yeager Road Community Resource Center
West Georgia Central Technical College
B.Y.R.D. House Behavioral Youth Resource Development
Family Patterns Matter
Community Action for Improvement (CAFI)
Bank OZK
Newnan Chapel United Methodist Church
Coweta Force
Coweta Family Connection
University of Georgia Extension Program

XV. FSS Portability (Applicable to HCV Only)

Instructions: While not specifically required by the federal program regulations, it can be helpful to include a section describing how the program will approach portability.

(see 24 CFR 984.306 and FSS Guidebook Section 6.7 Portability in the FSS Program)

Policy Decisions: In completing this section, you will need to make the following policy decision:

1. Whether your FSS program will allow portability in the first 12 months of enrollment.
2. Under what circumstances your FSS program will accept FSS participants porting into your FSS program from another jurisdiction's FSS program.
3. Under what circumstances your FSS program will agree to a family porting into your agency's jurisdiction to remain in the initial agency's FSS program (provided that the initial PHA agrees to retain the family in its program and demonstrates that the family meets conditions under 24 CFR 984.306(b)1 to fulfill its

Portability

A. Portability in initial 12 months

B.

Option 1: While *Housing Authority of Newnan* is not required to allow FSS participants to exercise portability within the initial 12 months after signing a CoP, it is the policy of *Housing Authority of Newnan* to allow for portability within this period to the extent feasible.

Options 2: FSS participants may not exercise portability within the initial 12 months after signing a CoP.

B. Moves into the PHA's jurisdiction

If an FSS participant moves into the PHA's jurisdiction, they will be admitted in good standing into the *Housing Authority of Newnan's* FSS program unless the *Housing Authority of Newnan* is already serving the number of FSS families identified in this FSS Action Plan and determines that it does not have the resources to manage the FSS contract.

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

C. FSS termination with disbursement for porting families

If an FSS family seeks to move to a jurisdiction that does not offer an FSS program, the *Housing Authority of Newnan* will closely examine the family's progress to determine if it would be appropriate to exercise FSS Termination with Disbursement as discussed above in the section on Termination.

<p>responsibilities under the initial CoP).</p>	<p>Where continued FSS participation is not possible, <i>Housing Authority of Newnan</i> will discuss the options that may be available to the family, depending on the family's specific circumstances, which may include, but are not limited to, modification of the FSS contract, termination of the FSS contract and forfeiture of escrow, termination with FSS escrow disbursement in accordance with 24 CFR § 984.303(k)(1)(iii), or locating a receiving PHA that has the capacity to enroll the family into its FSS program.</p>
---	---

XVI. Other Policies

<p>Instructions: Describe any other FSS program-related policies over which your program has discretion that are not covered above.</p> <p>The Sample Action Plan lists the local discretionary policies specifically identified under the section “optional additional information” in 24 CFR 984.201(d)13 and specifies in which section of this sample action plan each is included. Including a table like this one in your Sample Action Plan will make it easier to find policies that could be included under more than one heading.</p>	<h3>Other Policies</h3>	
	<p>Policy</p>	<p>Where Addressed in Plan</p>
	<p>(i) Policies related to the modification of goals in the ITSP;</p>	<p>Section IX Contract of Participation</p>
	<p>(ii) The circumstances in which an extension of the Contract of Participation may be granted</p>	<p>Section IX: Contract of Participation</p>
	<p>(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any)</p>	<p>Section VI: FSS Escrow Account and Other Incentives for Participants</p>
	<p>(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing</p>	<p>Section VI: FSS Escrow Account and Other Incentives for Participants</p>
	<p>(v) Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating</p>	<p>Section IV. Family Selection Procedures</p>
	<p>(vi) Policies on requirements for documentation for goal completion;</p>	<p>Section IX: Contract of Participation</p>

	(vii) Policies on documentation of the household's designation of the "Head of FSS Household;	Section IV. Family Selection Procedures
	(viii) Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference)	Section IV: Family Selection Procedures
	A. Other Policies	

XVII. Definitions

Definitions

The definitions below are specified in CFR 24 984.103. The terms 1937 Act, Fair Market Rent, Head of Household, HUD, Public Housing, Public Housing Agency (PHA), Secretary, and Section 8, as used in this part, are defined in 24 CFR Part 5.

Certification means a written assertion based on supporting evidence, provided by the FSS family or the **Housing Authority of Newnan**, as may be required under this part, and which:

- (1) Shall be maintained by the **Housing Authority of Newnan** in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification;
- (2) Shall be made available for inspection by HUD, the **Housing Authority of Newnan**, and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or the **Housing Authority of Newnan**, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

Contract of Participation (CoP) means - a contract, in a form with contents approved by HUD, entered into between an FSS family and a **Housing Authority of Newnan** operating an FSS Program that sets forth the terms and conditions governing participation in the FSS Program. The CoP includes all Individual Training and Services Plans (ITSPs) entered into between the **Housing Authority of Newnan** and all members of the family who will participate in the FSS Program, and which plans are attached to the CoP as exhibits. For additional detail, see § 984.303.

Effective date of Contract of Participation (CoP) - means the first day of the month following the date in which the FSS family and the PHA entered into the CoP.

Eligible families means current residents of Public Housing (Section 9) and current Section 8 program participants, as defined in this section, including those participating in other local self-sufficiency programs.

Enrollment means the date that the FSS family entered into the CoP with the **Housing Authority of Newnan**.

Family Self-Sufficiency (FSS) Program means the program established by a PHA within its jurisdiction or by an owner to promote self-sufficiency among participating families, including the coordination of supportive services to these families, as authorized by section 23 of the 1937 Act.

FSS escrow account (or, escrow) means the FSS escrow account authorized by section 23 of the 1937 Act, and as provided by § 984.305.

FSS escrow credit means the amount credited by the **Housing Authority of Newnan** to the FSS family's FSS escrow account.

FSS family means a family that resides in Public Housing (Section 9) or receives Section 8 assistance or receives HUD Project-Based Rental Assistance for a privately owned property, and that elects to participate in the FSS Program, and whose designated adult member (head of FSS family), as determined in accordance with § 984.303(a), has signed the CoP.

FSS family in good standing means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the **Housing Authority of Newnan**; and is in compliance with the regulations regarding participation in the relevant rental assistance program.pro

FSS related service program means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of “supportive services” set forth in this § 984.103.

FSS slots - refers to the total number of families (as determined in the Action Plan and, for mandatory programs, in § 984.105 of this part) that the PHA will serve in its FSS Program.

FSS Program Coordinator means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS participants; goal setting and case management/coaching of FSS participants; working with the community and service partners; and tracking program performance.

FY means Federal Fiscal Year (starting October 1 and ending September 30, and year designated by the calendar year in which it ends).

Head of FSS family means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent.

Individual Training and Services Plan (ITSP) means a written plan that is prepared by the **Housing Authority of Newnan** in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

- (1) The final and interim goals for the participating FSS family member;
- (2) The supportive services to be provided to the participating FSS family members;
- (3) The activities to be completed by that family member; and,
- (4) The agreed upon completion dates for the goals and activities.

Each ITSP must be signed by the **Housing Authority of Newnan** and the participating FSS family member, and is attached to, and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS Program, including the head of FSS family who has signed the CoP.

Owner means the owner of multifamily assisted housing.

Self-sufficiency means that an FSS family is no longer receiving Section 8, Public Housing assistance, or any Federal, State, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS escrow account funds.

Supportive services mean those appropriate services that a **Housing Authority of Newnan** will coordinate on behalf of an FSS family under a CoP, which may include, but are not limited to:

- (1) *Childcare*—childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- (2) *Transportation*—transportation necessary to enable a participating FSS family member to receive available services, or to commute to their place(s) of employment;
- (3) *Education*—remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;
- (4) *Employment Supports*—job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;
- (5) *Personal welfare*—substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services;
- (6) *Household management*—training in household management;
- (7) *Homeownership and housing counseling*—homeownership education and assistance and housing counseling;
- (8) *Financial Empowerment*—training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing and improving credit scores, etc.;
- (9) *Other services*—any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD’s legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act.

Welfare assistance means (for purposes of the FSS program only) income assistance from Federal, (i.e. Temporary Assistance for Needy Families (TANF) or subsequent program) State, or local welfare programs and includes only cash maintenance payments designed to meet a family’s ongoing basic needs. Welfare assistance does not include:

- (1) Nonrecurrent, short-term benefits that:
 - (i) Are designed to deal with a specific crisis or episode of need;
 - (ii) Are not intended to meet recurrent or ongoing needs; and,
 - (iii) Will not extend beyond four months.
- (2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

- (3) Supportive services such as childcare and transportation provided to families who are employed;
- (4) Refundable earned income tax credits;
- (5) Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF);
- (6) Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;
- (7) Amounts solely directed to meeting housing expenses;
- (8) Amounts for health care;
- (9) Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;
- (10) Supplemental Security Income, Social Security Disability Income, or Social Security; and
- (11) Child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child's need and not on the need of the child's current non-parental caretaker.

MTW Family Self-Sufficiency (FSS) Program Contract of Participation

This Contract of Participation for the Family Self-Sufficiency (FSS) Program is between _____, Public Housing Agency (PHA) or PBRA owner, and _____ head of FSS family.

The FSS family includes everyone in the household and is referred to in this contract as “family.”

Type of FSS Program.

The family is housed in: (Check only one)

- Housing Choice Voucher (HCV)/Project Based Voucher (PBV)
 Public Housing

Purpose of Contract

The purpose of this contract is to state the rights and responsibilities of the participating family and the PHA/owner, the resources and supportive services to be provided to the family, and the activities to be completed by the family.

Term of Contract

This contract will be effective on _____

This contract will expire on [5 years after the first recertification of income after execution] _____

The PHA/owner may extend the term of the contract up to 2 years if the PHA/owner finds that *good cause* exists for the extension.

Resources and Supportive Services

During the term of the contract, the PHA/owner will try to coordinate the resources and services listed in the Individual Training and Services Plans (ITSP). However, the PHA/owner has no liability to the family if the resources and services are not provided.

Individual Training and Services Plan (ITSP)

An Individual Training and Services Plan (ITSP) must be developed for each participating family member. All ITSPs for the family are hereby incorporated into and made part of this contract.

MTW FSS Goal Rewards

HAN will replace the Family Self-Sufficiency (FSS) escrow model with a Goal Rewards Model. In the Goal Rewards Model, participants earn immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals. Incentives can immediately and tangibly reward participants for progress toward self-sufficiency and inspire them to take the next steps. Participants will receive the incentive immediately via disburse check at the time the goal is completed. Participants will have the opportunity to start an individual savings account managed by an accredited financial institution. Participants who elect this incentive will be able to make deposits into their Individual Savings Account (ISA) while

participating in the FSS program. HAN will match the dollar amount deposit up to \$1,000 per year into the participant’s individual savings account.

Interim Withdrawal of MTW FSS Goal Rewards

Withdrawals from ISA account will not be allowed unless certain interim goals are established in the Contract of Participation (CoP) and the participant needs a portion of the funds for purposes consistent with or in support of the CoP, such as completion of higher education (i.e., college, graduate school), job training, vehicle repair or to meet start-up expenses involved in creation of a small business. Upon HAN’s discretion, a disbursement of the participant’s portion of the funds from the family’s ISA may be given to assist the family in paying those expenses.

Graduation from the MTW FSS Goal Reward Program

The PHA/owner will disburse to the head of FSS family immediate cash incentives for reaching milestones related to income, finance, education, health, employment, and other self-sufficiency goals less any amount owed to the PHA/owner (for unpaid rent or other outstanding debts), when the family is compliant with its lease, and:

- (1) the PHA/owner determines that the family has completed the terms of this contract, including the terms of all ITSPs; and
- (2) The head of FSS family certifies that no member of the FSS family is a recipient of welfare assistance;

Disbursement of ISA in Cases of Contract Termination

The PHA/owner *must* disburse to the FSS family the amount in the family’s FSS ISA account, less any amount owed to the PHA/owner (for unpaid rent or other outstanding debts), when the family is *compliant* with its lease and:

- (1) The PHA/owner, with HUD approval, determines there is good cause to disburse FSS ISA funds; or
- (2) When the Contract has been terminated for the following reasons:
 - a. Services that the PHA/owner 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, and the PHA/owner and FSS family determine it is not possible to modify the Contract or designated a new head of the FSS family; or
 - c. A voucher FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with regulatory portability requirements) for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

Head of FSS Family Leaves Assisted Unit

If the head of the FSS family leaves the assisted unit, the remaining family members may, after consulting the HA/owner, name another family member to take over the Contract or receive the FSS incentives and ISA funds in accordance with the terms of this agreement.

Loss of FSS Goal Rewards and ISA funds

The family will not receive the HA contribution of funds in its FSS ISA except as provided above. The FSS HA contribution of funds will be forfeited, and the family has no right to receive funds from the HA FSS ISA contribution if the contract is terminated, except as provided above. The family will only be entitled to participant’s contributions in the ISA account. Goal Rewards disbursements will cease effective the date of contract termination.

Family Responsibilities Head of FSS Family must:

- o Seek and maintain suitable employment. **The head of FSS family and those family members who have decided, with PHA/owner agreement, to execute an ITSP, must:**
- o Complete the interim goals, final goals, and any other activities by the completion dates contained in each ITSP.

All family members must:

- o Comply with the terms of the lease.
- o If receiving welfare assistance, become independent of welfare assistance by the end of this Contract term.
- o If participating in the HCV program, the family must comply with the family obligations under the HCV program and live in the jurisdiction of the PHA that enrolled the family in the FSS program at least 12 months from the effective date of this contract, unless the initial PHA has approved the family’s request to move outside its jurisdiction under portability.

Termination of the Contract of Participation

The PHA/owner may terminate this contract if:

- (1) the family and the PHA/owner agree to terminate the contract;
- (2) the PHA/owner determines that the family has not fulfilled its responsibilities under this contract;
- (3) the family withdraws from the FSS program; or
- (4) the PHA/owner is permitted to terminate the contract in accordance with HUD regulations and requirements.

Signatures:

Family

Housing Agency/Owner

(Signature of Head of FSS Family)

(Name of PHA/Owner)

(Date Signed)

(Official Title)

(Signature of PHA/Owner Official)

(Date Signed)

The PHA/owner will terminate this contract and distribute escrow according to 24 CFR 984 and 887 when:

- (1) Services that the PHA/owner and the FSS family have agreed are integral to the FSS family’s advancement towards self-sufficiency are unavailable
- (2) The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, and the PHA/owner and FSS family determine it is not possible to modify the Contract or designated a new head of the FSS family; or
- (3) A voucher FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements 24 CFR 982.353) for good cause, as determined by the PHA, and continuation of the CoP after the move, or completion of the CoP prior to the move, is not possible.

The PHA/owner must give a notice of termination to the head of FSS family. The notice must state the reasons for the PHA/owner decision to terminate the contract.

This contract is automatically terminated if the family’s rental assistance is terminated in accordance with HUD requirements.

Modification

The PHA/owner and the family may mutually agree to modify this contract or any incorporated ITSP in accordance with 24 CFR parts 887 and 984, as applicable.

Compliance with HUD Regulations and Requirements

The PHA/owner and the FSS family agree to comply with HUD regulations and requirements, including 24 CFR parts 887 and 984. To the extent that anything in this contract conflicts with HUD regulations or requirements, including parts 887 and 984, HUD regulations and requirements will prevail. Terms and figures, such as the income and rent amount on page 1, are subject to correction by the PHA/owner for compliance with HUD regulations and requirements. The PHA/owner must notify the family in writing of any adjustments made to the contract.

Conflict with the Lease

If any term of this contract conflicts with the lease, the lease will prevail.

Each Housing Agency (PHA/owner) must implement the FSS Program in compliance with 24 CFR 984 and 24 CFR 877.

Public reporting burden for this collection of information is estimated to average 1.0 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Response to this collection of information is mandatory by law (Section 23 (c) & (g) of the U.S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act (PL 101- 625) and Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174) for participation in the FSS program.

The information collected on this form is considered sensitive and is protected by the Privacy Act. The Privacy Act requires that these records be maintained with appropriate administrative, technical, and physical safeguards to ensure their security and confidentiality. In addition, these records should be protected against any anticipated threats to their security or integrity which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom the information is maintained.

HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Instructions for Executing the FSS Contract of Participation

Head of FSS Family

The family must designate an adult family member to be the Head of FSS Family who will sign this contract. The head of FSS Family may, but is not required to be, the head of the household for rental purposes. Under certain circumstances, consistent with 24 CFR part 887 and 984, as applicable, and this contract, the family may designate a new Head of FSS Family during the term of the contract.

Term of Contract

- (1) The effective date is the first day of the month following the date the contract was signed by the family and the PHA/owner's representative.
- (2) The expiration date is five years from the effective date of the first re-exam after the effective date of the contract. The expiration date may be left blank until the first rental re-exam.
- (3) If the PHA/owner decides to extend the term of the contract, the original expiration date listed on page one of the contract must be crossed out and the new expiration date added.
- (4) If a family moves under HCV portability procedures and is going to participate in the receiving PHA's FSS program, the effective date of the contract between the family and the receiving PHA is the first day of the month following the date the contract was signed by the family and the PHA's representative. The expiration date of the contract between the receiving PHA and the family must be the same as the expiration date of the contract between the initial PHA and the family.

FSS Escrow Account

- (1) The income and rent numbers to be inserted in this Contract must be taken from the amounts on the last reexamination or interim determination before the family's initial participation in the FSS program.
- (2) If a family moves under HCV portability procedures and is going to participate in the receiving PHA's FSS program, the receiving PHA must use the amounts listed for annual income, earned income, and family rent in this contract between the initial PHA and the FSS family.

Changes to the Contract

- (1) This contract of participation can only be changed to modify the contract term, the Head of FSS family, or the ITSPs.

- (2) Any change of the head of the family under the contract must be included as an attachment to the contract. The attachment must contain the name of the new designated head of FSS family, the signatures of the new head of FSS family and a PHA/owner representative, and the date signed.

- (3) Any change(s) to an ITSP must be included as a revision to the original ITSP (attachment) to which the change applies. The revision must include the item changed, signatures of the participant and a PHA/owner representative, and the date signed.

Individual Training and Services Plans (ITSPs)

- (1) The contract must include an individual training and services plan for the head of the family. Other family members aged eighteen and older may choose to execute an individual training and services plan if agreed to by the PHA/owner.

- (2) The resources and supportive services to be provided to each family member must be listed in the ITSPs which are attachments to the contract of participation.

- (3) Each ITSP must be signed by the participant and an PHA representative.

- (4) Interim goals must be specified along with the activities and services needed to achieve them. For example, a single mother with two children who has an interim goal of completing her secondary education might require several different activities and services to achieve that goal. These might include transportation, tutoring, and child care.

- (5) All completion dates included in the ITSPs must be on or before the contract of participation expires.

- (6) One of the final goals for families receiving welfare assistance is to become independent of welfare assistance by the end of the contract. Any family that is receiving welfare assistance **must** have this included as a final goal in the head of FSS family's ITSP.

- (7) The other final goal listed on the ITSP of the head of FSS family **must** include seeking and maintaining suitable employment specific to that individual's skills, education, job training, and the available job opportunities in the area.

Incentives

If the PHA/owner has chosen to offer other incentives in connection with the FSS program, these incentives may be included in the individual training and services plans or as an attachment to this contract.

Family Self-Sufficiency Program Individual Training and Services Plan

Attachment _____

Name of Participant _____

Final Goal

Interim Goal Number _____

Date Accomplished _____

Activities/Services

Responsible Parties

Date/s

Comments

Signatures:

Family

(Participant)

(Date Signed)

Housing Agency

(Signature of PHA/Owner Representative)

(Date Signed Title)

Family Self-Sufficiency Program Individual Training and Services Plan

Attachment _____

Name of Participant _____

Final Goal

Interim Goal Number _____

Date Accomplished _____

Activities/Services

Responsible Parties

Date/s

Comments