

OXNARD HOUSING AUTHORITY
REVISED FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN
PUBLIC HOUSING AND SECTION 8 HOUSING CHOICE VOUCHER PROGRAMS
July 01, 2015

BACKGROUND

This Action Plan has been developed in compliance with requirements of the Code of Federal Regulations (CFR) 24, 984-201, as authorized by the Family Self-Sufficiency (FSS) Program created by Section 554 of the Cranston-Gonzalez National Affordable Housing Act (NAHA) of 1990. The purpose of Section 554 is to “promote the development of local strategies to coordinate use of public housing and assistance under the housing choice voucher programs under Section 8 with public and private resources, to enable eligible families to achieve economic independence and self-sufficiency.”

FSS is a U.S. Department of Housing and Urban Development (HUD) program that encourages communities to develop local strategies to help Housing Choice Voucher (Section 8) families and/or families in the Public Housing Program to obtain employment that will lead to economic independence and self-sufficiency. Public Housing Agencies (PHAs) work with welfare agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a living wage.

In accordance with CFR 984.103 both the Section 8 and Public Housing Family Self-Sufficiency (FSS) program for the Housing Authority of the City of Oxnard (PHA’s) is contained in this Action Plan (Plan).

INTRODUCTION

The Housing Authority of the City of Oxnard, or Oxnard Housing Authority (OHA), is dedicated to assist families who wish to achieve economic independence and self-sufficiency. This FSS Program Action Plan outlines the direction, coordination, and implementation that the OHA will employ to fulfill the program’s objectives through interactive measures with the community and participating families. This Plan describes the policies and procedures of the FSS Program and the supportive service needs of the participants.

In partnership with local agencies, FSS program services may include, but are not limited to:

- Child care
- Transportation
- Education
- Job training and employment counseling
- Substance/alcohol abuse treatment or counseling
- Household skill training

- Homeownership counseling
- Financial counseling/coaching
- Resource referral

All families who receive assistance under the HCV or Public Housing Program are eligible to participate in the FSS program.

The OHA will identify and select the FSS participants for the program from assisted families in accordance with the HUD-approved number of authorized FSS slots. The OHA will establish and maintain escrow accounts for participants in which FSS-generated funds will be deposited. The OHA will apply to HUD for funding for FSS program coordinators when such funding is available.

The OHA has organized and maintained a Project Coordinating Committee (PCC). The FSS Project Coordinating Committees has helped develop this action plan, FSS program policies, obtain public and private supportive services funding and commitments, and oversee overall implementation of the FSS programs.

1.0 DEMOGRAPHICS OF PARTICIPANT FAMILIES AND SUPPORTIVE SERVICES NEEDED

The CFR requires specific demographic data for the OHA on its client population.

1.1 Oxnard Housing Authority – Section 8 – FSS

Number of mandatory HUD slots as of April, 2015: 12

Number enrolled as of May, 2015: 40 (80 combined with PH)

Total number of required FSS HUD slots for 2 FSS Coordinators: 75

Number of Sec. 8 households: 1,614

Average size of the Section 8 family (Sec. 8 families): 2.6

Sec. 8 families receiving public assistance as a %: 16

Sec. 8 household members under the age of 62: 3,426

Number of Sec. 8 families with disabled members: 626

Race composition of Sec. 8 households:

White	89%
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African American	7%
Asian	2%
American Indian/Alaska Native	1%

Ethnic composition of Sec. 8 households: 79% Hispanic, 21% non-Hispanic

Average annual income of Sec. 8 households: \$18,639

Breakdown of income levels in Sec. 8 households:

Extreme Low Income (30%)	982
Very Low Income (50%)	266
Low Income (80%)	59
Above Low Income (81%+)	3

1.2 Oxnard Housing Authority – Public Housing Programs – FSS

Number enrolled as of May, 2015: 40 enrolled (80 combined with Section 8)

Total number of required FSS HUD slots for 2 FSS Coordinators: 75

Families living in public housing: 650

Average size of public housing families: 3.3

PH families receiving public assistance as a %: 30

PH members under the age of 62: 1,858

Number of PH families with disabled members: 201

Race composition of PH households:

White	96%
African American	2%
Asian	1%
American Indian/Alaska Native	0%

Ethnic composition of PH households: 95% Hispanic, 5% non-Hispanic

Average annual income of PH households: \$25,812

Breakdown of income levels in PH households:

Extreme Low Income (30%)	389
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Very Low Income (50%)	179
Low Income (80%)	62
Above Low Income (81%+)	20

2.0 NUMBER OF ELIGIBLE PARTICIPANT FAMILIES

Estimate of participating families: Public Housing: 500, Section 8: 1,007

Number of eligible FSS families expected to receive supportive services: PHFSS: 35, S8FSS: 35

Number of eligible PH households from other self-sufficiency programs: 0

OHA operates a Resident Opportunities and Self-Sufficiency program and a Family Investment Center. Both programs will be represented on the Project Coordinating Committee and will actively participate in the recruitment and assistance of both Section 8 and Public Housing residents.

Demographics may be updated and amended at any time for this plan by the staff.

2.1 FSS Family Selection Procedures

In accordance with regulations found in 24 CFR, Sec. 984.203, the OHA will identify and screen prospective families for the programs to determine the types of services required to facilitate family self-sufficiency. The process will include evaluation of educational level, overall skills, job experience, and financial status. These factors and needed services are recorded for evaluation against available support services. This individual assessment initially determines the family’s eligibility for the FSS Program.

Selection procedures ensure that families will be selected without regard to race, color, religion, sex, handicap, familial status, or national origin.

2.2 Incentives Plan

FSS accounts will be maintained in accordance with 24 CFR, Sec. 984.305. The incentives plan shall be part of the Action Plan. Additional income derived from increased earned income will be maintained in the FSS account for as long as the resident adheres to their Contract of Participation (COP).

2.3 Outreach Efforts

The FSS program will generally be targeted to two groups of “family” households (non-senior and non-disabled):

- Those that are extremely low income (at or below 30% of area median income [AMI]); and
- Those that are on flat rents (these households are generally above 80% of AMI) which may be encouraged to move from public housing so as to make room for lower income households on Public Housing waiting lists.

All Section 8 and Public Housing families will be notified of the opportunities with particular attention paid to those with higher incomes. Notification of FSS Program availability is initiated as follows:

- At initial orientation to the programs for lease-up, all Section 8 and Public Housing program participants are informed about the FSS programs.
- Informative meetings are held to discuss program features and requirements.
- Program availability is discussed at each schedule reexamination.
- Newsletters, forums.
- Through review of tenant demographic and income data and direct outreach, including going door-to-door.

Incremental mailings may be sent to allow easier handling by the housing authority staff. Interviews are conducted and briefings arranged for groups of no more than ten (10) people to describe the program and to explain the necessary steps to apply.

2.4 Briefings

- Comprise the initial attempt to screen potential applicants for interest and possible success in the program;
- Allow the first opportunity to assess support-services requirements for the potential applicants;
- Permit explanation of the contract terms and the fact that the contract must be executed prior to receiving FSS Program assistance; and
- Afford an opportunity to clarify that violation of the FSS contract may constitute grounds for termination of the FSS Program.

The OHA holds meetings and distributes literature to ensure that families are able to make an informed decision about program participation.

In the case of an insufficient number of potential participants from the current Section 8 or Public Housing participants, the OHA may:

- Intensify its outreach efforts through additional mailings, if appropriate, or renewed interview sessions with potential applicants;
- Seek the assistance of current FSS Program participants to encourage and reassure potential applicants;
- Notify HUD and seek guidance and recommendations on additional or improved outreach methods; and
- Request a waiver from HUD to reduce FSS Program size only if all other efforts to meet program requirements fail.

The OHA will ensure that both minority and non-minority groups are informed about the FSS Program's availability and qualification requirements. All potential applicants will be notified, without preference to race or other discriminating factors. Information is prepared in bilingual format and distributed freely.

Each member of the OHA may solicit FSS Program volunteers from a list of Section 8 Rental Assistance Program participants and Public Housing residents according to current HUD policy and regulations. The list is prioritized in the order of the date of request.

Since participation is voluntary, a family may choose not to apply and still retain its status as a current Section 8 or Public Housing participant.

The PHA will reassign or withdraw the family if the following circumstances warrant:

- During formal application review, the family's priority changes or the family is found ineligible;
- The family fails to execute a Contract of Participation (COP) within 60 days of receipt of the Letter of Intent to Certify.

3.0 SUPPORTIVE SERVICES AND ACTIVITIES

The OHA and its local partners provide the following services as part of the FSS Program:

- Computer literacy instruction including a computer lab on-site;
- Community college courses;
- Drug and alcohol treatment and counseling;
- Education and training, including education toward completion of high school, scholarships, tuition-free courses, and course materials;
- Family counseling;
- ESL classes;
- Job search assistance and work readiness training;
- Youth development and after school programs for youth;
- Money management and financial literacy counseling and training;
- Government and community services;
- Personal and professional appearance guidance and training;
- Rental and homeownership opportunity counseling in private sector;
- Special education, including business and trade schools, and training for the handicapped;
- Homeownership training and counseling;
- Child care, during training and employment hours;
- Health services, including medical, mental health, dental, and health care counseling;
- Nutrition programs and food assistance;
- Self-esteem or self-improvement counseling or seminars;
- Transportation, including automobile, insurance, or public-transportation subsidies and car repair or maintenance services;

- Legal services
- Vocational training and placement; and
- Parent training.

Nearly all FSS Program participants require educational and employment assessment, followed by educational program and job-training enrollment. A high school diploma or equivalent and English language proficiency are considered top priorities.

4.0 IDENTIFICATION OF NEEDS, SERVICES, AND ACTIVITIES

4.1 Determination of Needs

A Project Coordinating Committee (PCC) will oversee all program activities. FSS candidates will be interviewed and a contract of participation will be negotiated detailing their goals and support services needed to achieve those goals. The evaluation process includes evaluation of educational level, overall skills, job experience, and financial status. These factors and needed services are recorded for evaluation against available support services. This individual assessment initially determines the family's eligibility for the FSS Program.

4.2 Questionnaire and Contract of Participation Preparation

Once the family's eligibility is determined, the family's concurrence is received, and the support services are secured, an FSS Program Questionnaire is filled out and signed. The FSS Contract of Participation (COP) is then executed between the PHA and the participating family. Details of the COP contents are provided in paragraph 16.0.

4.3 Conditions of Participation

Participation in the FSS Program will be under the following conditions and after the following events have occurred:

- The prospective family is presently participating the Section 8 or Public Housing program;
- The prospective family has been briefed on the FSS Program;
- The prospective family has returned its enrollment form;
- The PHA has screened the family to determine support-service needs and the availability of those services;
- The family agrees to participate;
- The family's eligibility to participate has been determined and a current recertification has been performed;
- The FSS Program Questionnaire is filled out and signed;
- The FSS COP is executed.

4.4 Essential Service Determination

The local PHA determines if an essential service is unavailable, resulting in disqualification of the prospective family. Each denied family's case is then presented before the Project Coordinating Committee (PCC) to allow the consideration of other options and further case

evaluation. If a service is consistently needed, the PHA and PCC will try to identify new support service resources. The OHA will conduct at least an annual reevaluation of available services against a family's requirements. This reevaluation will occur more often if necessary, depending on the frequency of support service additions. If a service becomes available after the family has been denied FSS Program participation, the PHA will notify the family.

5.0 AVAILABLE PUBLIC AND PRIVATE RESOURCES

5.1 Committed Resources

The PHA solicited housing and supportive services from a wide variety of human and social service providers throughout Ventura County. The PHA has obtained participation from the following private and public resources:

- Ventura County Community Development Corporation
- County of Ventura PSSA GAIN/JOBS Program
- Oxnard College CalWORKS Program
- County of Ventura Public Social Services Agency
- Employment Development Department (EDD) State of California
- Ventura County Department of Alcohol and Drug Program
- Ventura County Mental Health
- Child Development Resources
- Surepath Financial Solutions
- Women's Economic Ventures
- Family Investment Center
- Housing Resident Services Program
- Colonia Village Tenants Association
- Pleasant Valley Village Tenants Association
- California State University at Channel Islands
- Oxnard Adult Education
- Center for Employment Training (C.E.T.)
- Other agencies

Collectively these resources provide the following assistance:

- Connecting program participants with child care services; providing access to information about public and private day care facilities
- Evaluation and treatment for drug or alcohol-addicted participants
- Literacy and educational improvement through instruction and formal classes
- Employment information, training, and placement, suitable employment, job search assistance, including resume preparation, career guidance, and interviewing techniques
- Personal counseling to assist in personal management
- Information and referrals to other or additional sources for treatment or assistance
- Homeownership and budget counseling suitable for FSS Program participants

- Subsidized transportation and automobile repair or maintenance services
- Numerous additional support functions for economic and personal understanding and growth.

In addition to the previously identified resources, the OHA continues to solicit the service provider community and the private sector to maintain and improve its pool of services for FSS families. Such additional sources include:

- Business, trade, and computer schools (for example, Watterson College Pacific, Sawyer College)
- Local colleges and universities (for example, Oxnard College, Ventura College, Moorpark College, California State University Northridge-Ventura Campus, University of California Santa Barbara-Ventura Center)
- Youth organizations and centers (for example, Boy Scouts America-Ventura County, YMCA Boys and Girls Clubs)
- Family guidance and counseling services (for example, Interface Children Family Services of Ventura County)

5.2 Interagency Agreement

An interagency agreement or memo of understanding may be required between the OHA and the agencies providing the services. The PCC will evaluate the necessity of such an agreement and inform the OHA accordingly.

6.0 IMPLEMENTATION

The Project Coordinating Council (PCC) is established as a citywide entity, supporting the Public Housing and Section 8 Program Self-Sufficiency (FSS) programs of the Oxnard Housing Authority. PCC members provided input and advice for the preparation of this action plan. PCC organizational meetings are presently conducted at the OHA. The PCC meets as often as necessary to accomplish its FSS Program responsibilities. As the programs develop, the PCC may adjust the frequency with which it meets to accommodate changing needs.

The OHA has open enrollment for both the Public Housing and Section 8 Self-Sufficiency programs, both HUD-approved programs. Funding for the programs is solicited from HUD through competitive service coordinator grant awards and is utilized upon receipt of an Approved Contributions Contract (ACC) from HUD. In the event that service coordinator grant funds are not received for a particular year or years, the OHA may seek local resources or other alternative funding sources to continue the FSS programs.

7.0 PROGRAM COORDINATION CERTIFICATION

7.1 Coordination Efforts

The OHA coordinated service and activity efforts for the FSS Program with:

- Numerous health and human service organizations

- Educational and vocational opportunity services
- Private nonprofit organizations, including the Workforce Investment Board (WIB) of Ventura County and Greater Avenues for Independence (GAIN). GAIN is the California version of the Federal Jobs Opportunities and Basic Skills Training Program (JOBS)
- Legal services
- Homeownership opportunity groups.

A list of these agencies and organizations is provided in paragraph 5.1 and letters of commitment may be found in the OHA's application for the FSS Program.

7.2 Continued Coordination

The OHA continues to coordinate with these agencies and service organizations to keep them informed as to the program needs and status and to eliminate the possibility of duplicate efforts.

8.0 DESIGNATION OF NUMBER OF UNITS

The OHA maintains data on the designation of the number of units for the FSS Program by bedroom size and by program (housing choice voucher or public housing).

9.0 FSS PARTICIPANT SELECTION

9.1 Selection Method

Each member of the OHA shall solicit FSS Program volunteers from a list of Section 8 or Public Housing participants according to current HUD policy and regulations in 24 CFR, Part 984, and as described in paragraphs 11.0 and 12.0.

9.2 Participant Reevaluation and Notification

If a family declines to participate in the FSS Program, the family is informed that it may apply at any time in the future. The OHA also continues to inform Section 8 and Public Housing participants of the program's availability through newsletters and attachments to mailings and other notices. In addition, program availability is discussed at each scheduled reexamination.

Upon request to participate in the FSS Program, a family is placed in the already existing volunteer pool in the order of the date of the request. This order, however, may be subject to other priorities or considerations established by the PCC.

9.3 Available Services Tracking and Notification

If a PHA denies a family participation in the program because an essential service is unavailable, the denial will be recorded in an FSS Program database, along with the reason for the denial. The case will be presented before the PCC to allow for the possibility of other option considerations and further case evaluation.

The PHA will periodically reassess the database and available services to ensure family notification of any changes in support services. This reassessment will occur at least annually and more often if necessary, depending on the frequency of support service additions.

10.0 PUBLIC HOUSING

All policies and procedures contained in this plan shall apply to public housing participants.

11.0 NOTIFICATION AND OUTREACH EFFORTS

11.1 Current Resident Notification

Notification of FSS Program availability may be initiated as follows:

- A general letter is issued to all Section 8 or Public Housing participants.
- Informative meetings are held to discuss program features and requirements.
- Program availability is discussed at each scheduled reexamination.

Incremental mailings may be sent to allow easier handling by the housing authority staff. Interviews are conducted and briefings arranged for groups of no more than 10 people to describe the program and to explain the necessary steps to apply. The briefings:

- Comprise the initial attempt to screen potential applicants for interest and possible success the program;
- Allow the first opportunity to assess support-services for the potential applicants;
- Permit explanation of the contract terms and the fact that the contract must be executed prior to receiving FSS Program assistance; and
- Afford an opportunity to clarify that violation of the contract may constitute grounds for termination of both FSS and Section 8 or Public Housing assistance.

The OHA holds meetings and distributes literature to ensure that families are able to make an informed decision about program participation.

11.2 Recruitment Efforts

In the case of an insufficient number of potential participants from the current Section 8 or Public Housing participants, the PHA may:

- Intensify its outreach efforts through additional mailings, if appropriate, or renewed interview sessions with potential applicants;
- Seek the assistance of current FSS Program participants to encourage and reassure potential applicants;
- Notify HUD and seek guidance and recommendations on additional or improved outreach methods; and
- Request a waiver from HUD to reduce FSS Program size only if all other efforts to meet program requirements fail.

11.3 Minority and Non-Minority Notification

The OHA ensures that both minority and non-minority groups are informed about the FSS Program's availability and qualification requirements. All potential applicants are notified, without preference to race or other discriminating factors. Information is prepared in bilingual format, when appropriate, and distributed freely. Other outreach efforts are conducted according to the procedures described paragraph 11.2 and Section 8 and Public Housing Outreach plan.

11.4 Program Publication

If an insufficient number of FSS Program applicants are identified, additional outreach efforts will be conducted as described in paragraphs 11.2 and 11.3. However, the OHA does not anticipate that additional publication efforts will be necessary due to the number of current Section 8 or Public Housing participants and the limited number of FSS-funded increments.

12.0 SELECTION PROCESS AND DESCRIPTION

Each member of the OHA solicits FSS Program volunteers from a list of Section 8 Rental Assistance Program and Public Housing participants according to current HUD policy and regulations. The list is prioritized in the order of the date of request.

Since participation is voluntary, a family may choose not to apply and still retain its status as a current Section 8 or Public Housing participant.

PHA will reassign or withdraw the family if the following circumstances warrant:

- During formal application review, the family's priority changes or the family is found ineligible.
- The family fails to execute a COP within 60 days of receipt of the Program Questionnaire.

NOTE: The OHA assists the family in preparation of the COP in accordance with PCC rules and guidelines. The OHA uses FSS Contract of Participation form HUD-52560 (11-91) and its attached individual training and services plan for all FSS participating families.

13.0 ASSISTANCE TERMINATION OR WITHHOLDING POLICY

13.1 Termination Process

An FSS contract may be terminated or assistance may be withheld at any time if the participating family fails to fulfill the requirements of the contract. Grounds for termination of assistance could include:

- Failure to complete activities within the specified dates in the individual training and service plan;

- Failure to comply with the terms of the lease;
- Failure on the part of the head of the participating family to seek and maintain suitable employment based on skills and available job opportunities;
- Failure to meet any other obligations of the Section 8 or Public Housing programs;
- Moving from the OHA's FSS Program jurisdiction, without continuation of the existing program and without completing appropriate transfer to a new PHA's program; or
- Mutual consent of the parties.

13.2 Withholding Process

The OHA may temporarily suspend the contract of a participant family if the family encounters extenuating circumstances and is unable to complete the terms of its contract. Extenuating circumstances could include serious illness, unexpected layoff, or other unavoidable problems. Participants will continue to receive rental assistance, but the requirements of the individual training and services plan will be postponed until such time as determined by the OHA.

An agreement of understanding will be executed between the participant family and the OHA. The agreement will outline not only the terms of the suspension, but also the stipulation that continued participation in the program is contingent upon conformance with those terms within the adjusted or modified schedule contained the agreement.

13.3 Failure-to-Comply Determination

The OHA will refer all suspected failure-to-comply cases to its PCC. The PCC will review the case and make either of the following recommendations:

- Modify the Contract of Participation; or
- Terminate the Contract of Participation

The OHA retains final authority and disposition of all failure-to-comply cases following the recommendation by the PCC. The OHA may concur with the recommendation to modify the COP if the OHA determines that the family's failure to comply with the COP was due to circumstances beyond its control (for example, an involuntary layoff due to a staff reduction or a serious illness), or terminate the COP due to neglect or indifference. However, if the OHA decides to terminate the COP, the Section 8 or Public Housing assistance may not be terminated or withheld as a consequence of failure to complete the Contract of Participation without good cause. If referring a case to the PCC would delay a process when timing is essential to the outcome, the OHA may act without conferring with the PCC.

13.4 Hearing/Grievance Procedures

If a participating family fails to fulfill its COP and FSS Program assistance is terminated, the family may request an informal hearing as is the policy for Section 8 or Public Housing participants. The applicable grievance procedures are contained the OHA's administrative plan.

14.0 CURRENT PARTICIPANTS IN RELATED SELF-SUFFICIENCY PROGRAMS

The OHA does not have any families participating in other self-sufficiency programs such as Operation Bootstrap or Project Self-Sufficiency.

15.0 DEFINITION OF TERMS

15.1 Seeking and Maintaining Employment

Seeking employment includes activities such as actively searching for a job, applying for work, participating in job interviews, and other types of employment follow-up. Maintaining employment includes meeting the minimum standards and requirements necessary for that specific employment and employer. These standards and requirements must be within the capability of the employee.

15.2 Suitable Employment

The head of the FSS family (who must be at least 18 years old) must seek and maintain suitable employment sometime during the contract. Only the head of the FSS family is required to seek and maintain employment, not the other members of the family. Suitable employment objectives should include employment in more than minimum wage jobs, unless there is a potential for advancement. Attending school is not acceptable, unless the head of the FSS family coordinates part-time schooling with part-time employment and obtains approval from the PHA.

15.3 Essential Service

An essential service is one that is critical to the coordination of other support services. For example, securing employment for a single head of household will generally require securing daycare assistance.

15.4 Employment Income

Employment income includes all wages, tips, salary, and any other earnings from self-employment. It does not include any pension or annuity transfer payments, cash or in-kind benefits, or funds deposited in the escrow account on behalf of the FSS participating family.

NOTE: The OHA makes the final interpretation of these definitions and the acceptability of the FSS family's performance against these definitions. This determination is reached through consultation between the PHA and the head of the FSS participating family.

16.0 CONTRACT AMENDMENT PROVISIONS

The Contract of Participation is executed between the PHA and the participating family. It establishes goals to be accomplished and deadlines to be met by the head of the FSS family. It

defines the reasons for termination of the contract and removal from the FSS Program. The contract also outlines the support services to be offered by the PHA.

The initial term of the contract is five (5) years, with an optional two (2) year extension at the discretion of the PHA. The extension must be requested in writing by the participating family and must state the good-cause reasons for the request. Extension of the contract entitles the participating family to continue to accrue FSS escrow credits. The PHA is responsible for evaluating and determining all contract amendments and modifications.

If acceptable to the PHA, the following contract provisions may be modified:

- Individual training and service plan;
- Contract term; and
- Head of family designation.

17.0 REAPPLICATION FOR ASSISTANCE

17.1 Program Termination

If a family is terminated from the FSS Program due to contract violations, the disposition will be handled as detailed in paragraph 13.3.

17.2 Program Completion and Re-Enrollment

If a family completes the FSS Program, it may continue receiving rental assistance if needed. However, the family may not re-enroll for the FSS Program a second time but may be offered FSS supportive services to help continue toward self-sufficiency.

A family that did not complete the FSS Program and did not receive any escrow savings may request to re-enroll in the program a second time. Re-enrollment will be allowed at the discretion of the OHA according to the following conditions:

- The family is in good standing with regards to its Public Housing or Section 8 and FSS responsibilities;
- The family was not terminated initially from the FSS Program due to fraud;
- The family will be assessed to determine they are motivated, willing, and capable of completing the FSS contract by obtaining suitable employment and completing all goals that will be identified in the COP;
- The family must wait for a period of 1 year for re-enrollment in the program after the initial FSS Contract has been terminated; and
- The family will receive low priority by being placed last in the waiting list if any, and behind any other families waiting to enroll in the program.

18.0 ESCROW ACCOUNTS

18.1 Account Formation

An interest-bearing escrow (savings) account is established for each FSS Program participating family. The amount of FSS credit or escrow contribution is computed according to HUD regulations and guidelines.

If a Contract of Participation is extended for good cause as described in paragraph 16.0, FSS escrow contributions continue to accrue according to HUD policy.

18.2 Interest Accrual and Investment

The amount of FSS escrow contribution shall be calculated according to HUD statute as defined in the applicable Federal Register. An FSS Escrow Account Credit Worksheet is completed for each new lease, reexamination, and interim change. One copy of worksheet is submitted to the Finance Department. The Finance Department maintains escrow accounts according to HUD regulations and invests escrow funds in the HUD-approved investments.

Interest is accrued as earned and a quarterly account balance/report is made available for review upon request by the family or authorized agency. The quarterly balanced/report identifies each escrow account, lists the active balance in each account and provides the total amount of FSS escrow funds on deposit.

18.3 Money Owed to the PHA

If a family owes money to the PHA, the money will not be deducted from the escrow account funds. All escrow funds are protected from withdrawal, except as noted in paragraph 19.1, until the participating family's contract is completed. Interest will continue to accrue as usual. At the time of the escrow fund distribution, any monies owed to the PHA will be deducted.

19.0 ESCROW FUND DISTRIBUTION

19.1 Participant Requirements

In order to receive its escrow funds, an FSS Program participating family must fulfill and successfully complete the terms and conditions of its Contract of Participation (COP). Successful completion will be monitored and documented by the PHA as described in paragraphs 22.0 through 22.2.

NOTE: Under certain situations as identified by HUD, an FSS Program participating family may receive funds from the escrow account prior to completion of the COP. Example situations could include the need for special tools or clothing for employment requirements. All situations will be evaluated on a case-by-case basis.

19.2 Interim Disbursements

A family participating in the FSS program may request an interim disbursement of escrow funds prior to the completion of the COP. The FSS Coordinator and the Public Housing/HCV Program Supervisor will review interim disbursement requests and submit a recommendation to the Housing Director. The Housing Director will make the final decision on all interim disbursement requests according to regulations and this Action Plan.

Interim disbursements will be made at the discretion of the OHA according to regulations and the following limits and conditions:

- The funds are needed to complete goals in the family's Contract of Participation (example: to pay for school costs or transportation to work);
- The family is in good standing with regards to its Public Housing or Section 8 and FSS responsibilities;
- Interim disbursements are granted for no more than thirty percent (30%) of the family's escrow balance at the time of the request;
- Requests are made in writing and the family provides verification about the item or service to be purchased (i.e. estimates for car repair, registration information for a class, etc.);
- The family must have already completed at least one (1) goal in their FSS Contract of Participation found in their Individual Service and Training Plan;
- No less than the amount of \$100.00 can be disbursed (minimum amount);
- The OHA will grant no more than one (1) interim disbursement, although an exemption may be granted from the OHA because of financial hardship; and
- The funds will not be used to meet any recurring expenses or bills.

19.3 Escrow-Check Issue

When the PHA determines that a family has met the conditions of its COP and the family is no longer receiving welfare assistance, the FSS escrow funds are calculated and disbursed. Any interest accrued since the last quarterly statement is added and any monies owed to the PHA are subtracted. The OHA expects to issue escrow-fund distribution checks within 2 months of receipt of program termination and appropriate family certification.

20.0 PROJECT COORDINATING COMMITTEE

20.1 Members

OHA representatives met and evaluated the requirements for a Project Coordinating Committee (PCC). The decision reached established one citywide PCC to serve all the housing developments of the Housing Authority of the City of Oxnard. The PCC's goal is to have at least one representative from each of the following:

- Department of Labor
- Each OHA program involved with self-sufficiency efforts

- Health and human services
 - Greater Avenues for Independence (GAIN)
 - Public Social Services Agency (PSSA)
- Workforce Investment Board
- Legal services
- Local city management
- Private business
- Private sector homeownership and rental counselors
- Support service providers
- Welfare and employment agencies
- Public Housing tenant organization/s

20.2 Functions and Responsibilities

The PCC is responsible for assisting with the development of the FSS Action Plan and FSS Program policies and procedures. The committee helps with PHA requests for supportive service funding and service commitments and assists with overall implementation of the FSS Program.

The PCC and the PHA coordinate to fulfill the following requirements:

- Review of the projected program participant needs as presented by the OHA members and the resources available through PCC representation and commitments received from others.
- Review of the FSS Program volunteer pool after the prospective applicants have been formally screened by the OHA and determined as certifiable,
- Search, solicitation, and procurement of commitments from public and private, sources for implementation and operation of the FSS Program.
- Determination of the requirements for Contract of Participation (COP).
- Evaluation of funding, staffing, and contracting needs, including recommendations to the OHA concerning those evaluations.
- Review and recommendation for acceptance or denial of each COP submitted by the OHA. (Recommendation for acceptance shall also include acceptance of each service provider involved in that contract. Recommendation for denial shall include specific reasons [for example, essential services unavailable]).
- Serving as review panel for actions required to terminate FSS Program assistance for family failure to fulfill COP requirements. The PCC may elect to modify a family's COP if the failure was beyond the family's control. (Also see paragraph 16.0 for contract amendment discussion.)
- Evaluation of the FSS Program's success, including the ability to obtain necessary resources, coordination of agencies to provide services, implementation of program requirements, and documentation of participant family successes and failures.

PCC organizational meetings are presently conducted at the Oxnard Housing Authority. The PCC meets as often as necessary to accomplish its FSS Program responsibilities. As the program develops, the PCC may adjust the frequency with which it meets to accommodate changing needs.

20.3 Coordination of Program Efforts

Although the PCC assists with overall program implementation and monitoring, certain duties, such as case management, will be delegated to the program level. Case management functions may also be assigned according to the following options:

- To the PCC which may create a position to perform these functions; or
- To the OHA which may staff this position in the future if the number of funded increments warrants it.

OHA responsibilities include:

- Assessment of community needs
- Program staffing
- Progress monitoring and reporting (case management)
- Reporting to the PCC on program status
- Proposal and grant writing
- Selection and screening of participants in conjunction with the PCC
- Preparation and monitoring of the Contract of Participation in conjunction with the PCC
- Any additional support required to assist the PCC and program participants.

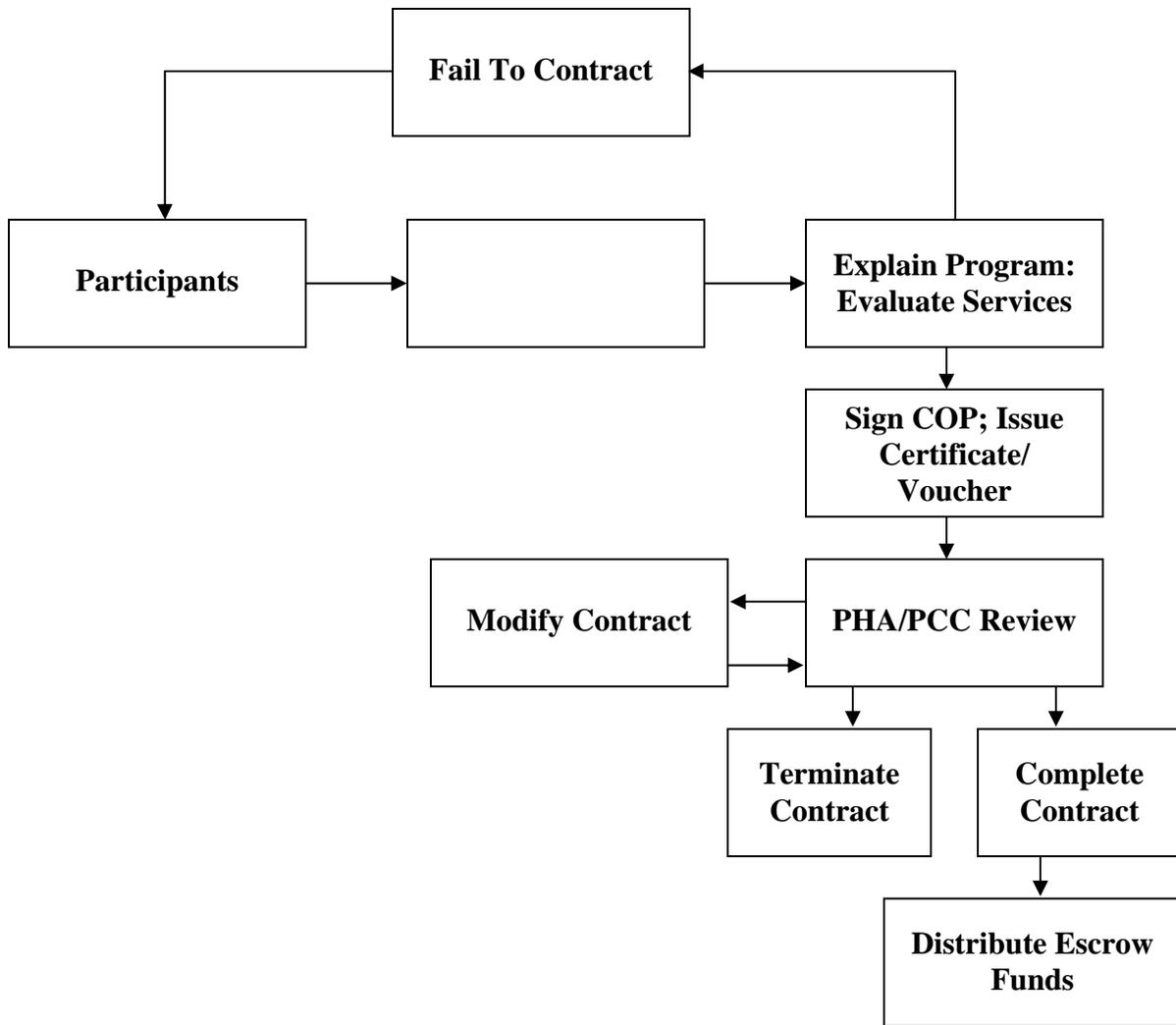
Overall FSS Program coordination, PCC involvement, and process flow are illustrated in Figure 1 (FSS Program Flowchart).

21.0 PORTABILITY CONSIDERATIONS

The family may continue with the OHA's FSS Program if it can demonstrate an ability to fulfill its contract at the new location. If necessary, the family may request a transfer to a new PHA's FSS Program. That acceptance is at the sole discretion of evaluation the new PHA.

22.0 FSS CONTRACT MONITORING

The OHA is responsible for contract monitoring in conjunction with the participating family. The OHA may elect to delegate contract monitoring to another agency (for example, to a contracted case management service, or the OHA may elect to staff the position in the future if the number of funded increments warrants it). The PHA will review the procedures used by whichever agency is providing the case management service and conduct annual assessments with case management personnel on the status and progress of each contract. If originally identified services are inadequate for the participating family, attempts to identify alternate services will be initiated.



COP = Contract of Participation
 PCC = Project Coordinating Committee
 PHA = Public Housing Authority

Figure 1. FSS Program Flowchart

22.1 Performance Evaluation

Each contract's individual training and services plan outlines the necessary activities and milestones required for contract compliance and completion. Performance is judged against these criteria. The frequency with which that contract is monitored depends on the nature of the requirements. (For example, if drug rehabilitation is a contract provision, weekly or more frequent monitoring may be necessary. On the other hand, if the participant is fully employed and job promotion is the only mandate, then periodic, even yearly, monitoring may be sufficient.)

22.2 Necessary Documentation

A participant's failure to comply with the FSS contract will be reported by the case management agency. The report will initiate a review and evaluation by the PCC. After review and recommendation by the PCC, the PHA may elect to terminate the contract or modify the contract as described in paragraph 13.3.

23.0 SITE-SPECIFIC PROGRAM

If a site-specific FSS Program is adopted (for example, a specific housing development is used), the PHA may reinstate families who leave the program to Section 8 or Public Housing rental assistance status. Reinstatement will be allowed unless family has violated a term or condition of its lease.

24.0 OTHER ITEMS

24.1 Annual Report

An annual FSS Program report is submitted to HUD by September of each year on the HUD-provided form, or at reporting times that may be established by HUD from time to time. The report provides data similar to the following:

- Activities performed as part of the FSS Program
- Evaluation of program effectiveness
- Description of coordination with support-service providers and the results of that coordination
- Recommendations for program improvements, including PCC, PHA, legislative, and administrative actions