HOUSING AUTHORITY
OF DEKALB COUNTY,
GEORGIA

A FAMILY SELF-SUFFICIENCY PROGRAM

ACTION PLAN

HOUSING CHOICE VOUCHER PROGRAM
# Table of Contents

- Program Summary ................................................................. 3
- Family Demographics ............................................................. 4
- Estimate of Participating Families ........................................... 4
- Outreach Efforts ...................................................................... 4
- Family Selection Procedures ................................................... 5
- Incentive to Encourage Participation ....................................... 5
- FSS Activities and Supportive Services ..................................... 6
- Methods for Identification of Eligibility and Supportive Service Needs ................................................................. 7
- Assurance of Non-Interference with the Right of Non-participating Families ................................................................. 12
- Timetable for Implementation of FSS Program ........................... 12
- Certification of Coordination ................................................... 13
- Program Components ............................................................. 13
- Termination Policy .................................................................. 13
- Optional Information ............................................................. 14
- Complaints and Appeals ......................................................... 14
- Program Coordinating Committee .......................................... 15
I. Program Summary

The Family Sufficiency (FSS) Program was established in 1990 by Section 554 of the National Affordable Housing Act. It is one of the successor programs designed to project and increase self-sufficiency, encourage economic independence and promote bootstrap initiatives.

FSS is a HUD-initiated program that encourages communities to develop local strategies to assist families receiving any type of government subsidy with the tools to increase job opportunities, obtain, and maintain employment and provide life skills enhancements designed to promote economic independence and self-sufficiency. Public housing agencies (PHAs) work in partnership with welfare agencies, schools, businesses, and other local community partners to develop a comprehensive program that provides participating FSS family members with the opportunity to develop the skills and experience to enable them to obtain employment that pays a living wage (i.e. suitable employment).

The current administration upon arrival at HADC, reviewed all resident initiatives and decided the Agency was not in a position to offer the FSS program, based on the HUD prescribed format. Therefore, a decision was made to eliminate the initiative until the HADC departments focusing on HCV and resident services were restructured. The 2010 grant funds received by HADC for an FSS Coordinator were returned to HUD.

To operate either a voluntary or mandatory HCV-FSS program, the HADC must establish an FSS program coordinating committee and develop an FSS action plan. The FSS program Coordinating Committee will assist the PHA to develop its action plan and FSS program policies, obtain public and private supportive services funding and commitments, and oversee the overall implementation of the FSS program. As the HADC previously operated the FSS program, the Coordinating Committee will be reconvened and new participants added as applicable. As the local HUD Field Office must approve the FSS action plan, it will be forwarded upon completion of milestone tasks to include restructuring the Program Coordinating Committee.

After a thorough restructuring of the Resident Services Department and a review of resident needs as the HADC has been approved for the Rental Assistance Demonstration Program (RAD), an administrative decision was made to re-implement the FSS program. Under RAD, all HADC conventional public housing units will be converted to project-based vouchers. Therefore, a need has been identified to provide a continuum of service provisions to HCV participants focusing on self-sufficiency directives.

Previously, the FSS program was structured to only include a single tract and all participants were required to establish an escrow account to be in “good standing” and focus on homeownership as a desired goal. The re-designed FSS program will offer four (4) distinct tracks to self-sufficiency.

The initial track or “general” is designed for families who choose to participate as they may desire to receive one or more of the supportive services offered through FSS but do not have the desire to commit to a full “case-management” service agreement. Participants in this track will receive an initial, placement needs assessment. At any time during their service delivery the participant has the option to request in writing that they choose to enter into a case-management track.

The second track, the “Bridge” track is for participating families whose household has an annual earned income of $0-$9,999. This track is comprised of a mix of families who have no income or whose primary income is derived from work as well as some type of assistance (TANF, CS, SS/SSI, etc). Families on this track usually have a variety of developmental issues that need to be addressed. The services that may be coordinated through the FSS Staff may include, but are not limited to: life skills training, basic skills training, GED, career advisement, vocational training, post-secondary education, job readiness training, job search assistance, job placement, job retention training, child care assistance, health care, transportation assistance, substance abuse treatment, and family therapy. Once the family's annual earned income
surpasses the $10,000 point they are advanced to the third track entitled “Stepping Stone”.

Families on the “Stepping Stone” track have a combined household earned income of $10,000-$17,999. “Stepping Stone” families generally have minimal education and training, skills, employment experience and are underemployed. In order to address these issues, they may receive: educational advisement, career advisement, vocational training, post-secondary education, job readiness training, job search assistance, job placement, job retention training, child care assistance, transportation assistance, substance abuse treatment, family therapy, and other services as needed. Once the family’s annual earned income surpasses the $18,000 point they are advanced to the fourth track entitled, “Pathways to Economic Independence”.

Families enrolled in “Pathways to Independence”, have a combined annual earned income of $18,000 or above. The head-of-household of “Pathways” families usually has a significant educational or training background, significant work experience, and may have accumulated a significant amount of funds in an FSS Escrow Account. At this stage family members may need assistance with obtaining additional education, improving their employment situation, financial advisement and planning, college planning, homeownership preparation, etc. Families will be encouraged to but not mandated to include homeownership as a goal in their Individual Tenant Service Plan (ITSP).

With the exception of the general or initial track, all participants will be required to list “To obtain and maintain suitable employment” as one of their final goals. Obtaining employment must be identified in the ITSP by activities that fall under the definition of “seeking suitable employment” as listed:

**Seeking Suitable Employment:** To be actively in search of suitable employment by having a minimum of 20 job inquiries (submittal of resume, cold-calling, submittal of application) and/or job interviews per week that may lead to an employment opportunity relative to the education and/or training obtained while in the FSS Program that allows the participant to become self-sufficient without any welfare assistance (food stamps, Medicaid, etc.). Search must be documented by a verification form which may be obtained from the FSS Clerk or FSS Coordinator.

**II. Program Coordinating Committee**

The HADC will request that all partnering agencies provide a representative to serve on the PCC. In addition to the aforementioned, a representative from the Welfare Investment Board will be requested to participate. This configuration will afford the HADC representation of residents, public and private education entities, welfare, and employment agencies. This collaborative effort will better position program participants to take full advantage of services being provided. The Program Coordinating Committee will meet on a quarterly basis.

**III. Demographics of Participating HCV Families**

Demographics, to include the number of participants, family size, racial and ethnic data, and supportive service needs shall be maintained. Participant selection, enrollment, and retention information shall be maintained.
Ethnic Groups / Program Track Breakdowns:

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>General</th>
<th>Bridge</th>
<th>Stepping Stone</th>
<th>Pathways to Independence</th>
</tr>
</thead>
<tbody>
<tr>
<td>African American / Black, Non-Hispanic</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>African American / Black, Hispanic</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Caucasian, Non-Hispanic</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Caucasian, Hispanic</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Native American/Pacific Islanders</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

IV. Eligibility

Only HADC participants of the Housing Choice Voucher Programs (HCV) will be eligible to participate in the FSS Program. Participants porting into the jurisdiction are eligible to continue participation in the FSS Program or may begin participation.

V. Estimate of Participating Families

The HADC estimates approximately there are approximately 5000 families enrolled in the HCV program (including ports). The majority of the FSS participants will only receive supportive services and will not be eligible or required to establish an escrow account.

It is the goal of HADC to target a FSS enrollment of 500, or 10% of the general population, for the general tract. Twenty-five (25) participants will be targeted as the goal for Pathways to Independence with escrow accounts. Participants may begin in the General Track and then select to receive more intensive case management and will be assigned to the Bridge, Stepping Stone, or Pathways to Homeownership based on their current income and desire to participate in the FSS Escrow component of the program.

VI. Outreach Efforts

The Resident Services Department and the Resident Services Corporation, an affiliate of HADC, to include Staff dedicated to FSS, will be primarily responsible for identifying and recruiting new participants. Outreach efforts may include direct mailings, briefings of service providers, orientation sessions to potential participant families, and flyer circulation/distribution. As needed, bi-lingual information may be available. The FSS Program will also be explained at the HCV Program briefings. More specifically, the direct recruitment efforts will include:

- Mass Mailings to HCV and traditional Public Housing recipients
- Distribution of Information Pamphlets
- Orientation Sessions (conducted during tenant briefings)
- Partnerships with HADC Partners (DeKalb County Career Centers, DeKalb County Workforce Development, etc.)
- Electronic media/email, in-lobby television and text campaigns, etc.
- Recruitment during annual Housing Choice Voucher certifications
Staff will make a direct appeal to current HADC program participants to participate in the FSS Program. This appeal will take place at the time of their annual renewal and during the regular course of resident contact. Program Participants are invited to attend an FSS orientation session that explains the program. Direct mailing and flyers are a vital part of outreach efforts; however, the most effective method is direct personal contact.

All new participants will be provided information concerning the program and an invitation to attend a scheduled orientation session.

Families who do not decide to participate in the FSS program will not be affected by their decision. They will retain all rights under the HCV program.

VII. FSS Family Selection Procedures

As previously stated, although the HADC will market the FSS general track to target 100% of the HCV client population, it is the goal of HADC to target a FSS enrollment of 500 or 10% of the general population, for the general tract. Five percent (5%) of the total FSS enrollment or twenty-five (25) participants will be targeted as the goal for Pathways to Independence with escrow accounts. For participation in the escrow component, the HADC will give selection preferences to include - 10% of the total FSS slots will be given to portable HCV families in good standing; 90% to other HADC HCV families. There will not be a maximum or minimum number assigned to those choosing to participate in the initial "General" track for supportive services without case-management.

All potential participants of the FSS Program without regards or preference to the track enrolled shall be informed about the following incentives:

- Escrow Account
- Increased Independence
- Increased Income
- Education and Training
- Homeownership and Others

VIII. Incentives to Encourage Participation

HADC promotes the FSS Escrow Account and participation in the HADC Homeownership Program as incentives to prospective families.

FSS Escrow Account

HADC shall establish an interest bearing FSS Escrow Account for each participating HCV families. An escrow credit, based on increases in earned income of the family, will be credited to this account by the HADC during the term of the FSS contract or Contract for Participation (COP). The credit to this escrow account, in accordance with HUD requirements will be determined by HADC and represents the appropriate amounts to be credited to the family's account, allowing for all mandatory adjusted income exclusions. The HADC will make a portion of this escrow account available to the family during the term of the contract to enable the family to complete an interim goal such as education.
If the family completes the contract and no member of the family is receiving cash welfare assistance, the amount of the FSS account is paid to the head of the family. If the HADC terminates the FSS contract, or if the family fails to complete the contract before its expiration, the family's FSS escrow funds are forfeited.

Families qualify for an FSS Escrow Account in two situations:

- A family enters the program unemployed and gains employment; and
- A family enters the program employed and has an increase in earned income due to a raise, promotion, or job change.

Escrow account funds shall be deposited by the HADC into a HUD approved financial institution. Deposit income shall be credited monthly to the account. If the family is able to purchase a home prior to completion of other goals listed in their ITSP, the HADC will allow for interim disbursement to be used for the home purchase. Other interim disbursements may also be allowed for emergency purposes in order to enable the family to fulfill goals and objectives listed in their ITSP at the discretion of the FSS Program Coordinator. The family will be allowed to continue participation in the program until all goals have been completed.

Escrow accounts for porting families will be maintained by the families’ originating housing authority and be coordinated by the FSS Case Manager/Coordinator. All withdrawals will be subject to the approval of the originating housing authority.

- **Homeownership**

FSS participants who reach this point in the program are usually employed, have established good credit, and have a significant amount of money in their escrow account. At this stage, participants are referred to the HADC Homeownership Counseling Program which is administered by the non-profit affiliate, Resident Services Corporation. A Homeownership Counselor will then work with the family throughout the process of purchasing a home. In addition, the family will receive counseling on money management, budgeting, energy conservation, and home maintenance.

Once the participant begins their search for a home, the FSS Clerk or FSS Coordinator, in addition to the Homeownership Counselor, will closely monitor the participant's progress. This supportive method of assisting the family throughout the home buying process will give them increased confidence in their ability to become homeowners.

**IX. FSS Activities and Supportive Services**

All participants seeking to receive or benefit from supportive service provisions will be required to attend a mandatory orientation meeting. The first orientation session will include a presentation by FSS staff. The initial orientation does not have to be a singular activity but may be presented in a group format to maximize attendance. The structure for the orientation session may be included as follows:

- **A. Welcome** - Attendance is taken at the door and "first name" tags are prepared. Guests are greeted on an informal basis.
- **B. Program & FSS Staff Introduction** - The staff will explain the main objective and process of the program.
- **C. Client Self-Assessment & Goal Setting Exercise** - Ever mindful that self-esteem of the participants is of the utmost importance, the FSS Coordinator shall facilitate an informal
client self-assessment and goal setting exercise. Self-exploration is critical in the quest for developing a self-sufficiency plan or presenting the various types of supportive services available through FSS. The orientation will also foster a feeling of independence, interdependence, and mutual support for individuals who might typically otherwise feel isolated and alienated from others. Also, this exercise serves as a tool to ascertain "real" interest from "curiosity" as pertains to the pursuement of FSS directed self-sufficiency initiatives.

D. **Program Briefing** - The FSS Staff will be prepared to address the following types of questions:

1. **(What is the FSS Program?)** The FSS Program is a program to promote economic self-sufficiency among residents of federal assisted programs.

2. **(How does FSS work and how do you achieve success?)** The staff may review the FSS Brochure/Information Sheet and discuss when a FSS participant is considered to have achieved success. The staff will explain the criteria for the definition of successful completion of the FSS Program.

3. The staff will explain the Escrow Account as another incentive of the FSS Program.

E. **Question and Answer Session** - The staff will allow for a question and answer session. The main objective of this session is to encourage the guests to ask questions to obtain clarifications.

F. **Application** - The staff will allow approximately from ten to fifteen minutes to review the basic content areas in the application for the FSS Program. The staff will ask the guests to fill out the application if they feel they are interested in becoming FSS Participants.

Handouts provided for the orientation session are as follows:

- FSS Information Sheet/Brochure
- FSS Application
- FSS Orientation Acknowledge Form
- FSS Pre-Enrollment Information
- FSS Personal Needs Assessment

After the family has expressed interest in participating by completing the application for the program, the FSS Coordinator will schedule a follow-up appointment.

**X. Methods for Identification of Eligibility and Family Supportive Needs**

After the first meeting with program staff, the potential participating family will be scheduled an appointment to complete an initial assessment to determine program eligibility.

The assessment results will then be used to determine which program track the family will be placed on, and the identified supportive service needs.

Each family will then be assigned to the FSS Clerk based on their program track and will enter into a Contract of Participation with the HADC. An Individual Training and Services Plan will be developed if the participant is entering into Tracks 2-4 (Bridge, Stepping Stone, and Pathways to Homeownership). The
Individual Training and Services Plan will include the individual’s goals and the services and activities needed to reach the goals.

Participating families in all tracks will be responsible for communicating with the FSS Clerk on a defined schedule to evaluate their progress and determine any additional supportive needs or difficulties that they may be encountering.

Track 1 or “General” participants will be required to meet with the FSS Clerk quarterly, Bridge Families must meet with the FSS Clerk at least twice a month, Stepping Stone Families must meet with the FSS Clerk at least once a month and Pathways to Economic Independence Families must meet with the FSS Clerk once every two months.

**Recruitment** ⇒ **Orientation** ⇒ **Interview/Assessment** ⇒ **Enrollment** ⇒ **Create ITSP Plan** ⇒ **Monitoring** ⇒ **Program Completion**

In addition to the required meetings with the FSS Clerk, each participant is required to attend mandatory group meetings according to their program track held at the discretion of the FSS Program Coordinator.

The supportive services needed by participating families will primarily be provided through existing and future HADC collaborations and partnerships. Needs for supportive services will be identified through each participating family’s initial and subsequent assessments. The FSS Clerk will primarily make referrals to partnering agencies. Currently, some of the most identified needs include, but are not limited to direct counseling, education & training, health care, child care, advocacy, transportation assistance, job readiness & placement, youth programs, and homeownership counseling.

The HADC has been extremely successful in the development of effective and long-term partnerships that have been instrumental in a seamless service delivery process. Some of the HADC’s existing partners include:

**Georgia Piedmont College**

**Services include:**
- Career Interest Assessment
- Counseling
- Job-Readiness/Job Retention/GED classes
- Life Management Workshops (Goal setting, Decision-making, money management, interpersonal communication skills, self-esteem)
- Skills Training

**Clark Atlanta University Economic Development Center**

**Services include:**
- Youth Entrepreneurship Training
- Fast Track Entrepreneurial Training
- Franchise Ownership Program
Housing Authority of Fulton County, Georgia HUD-Certified Housing Counseling Center

The scope of services includes educational/counseling sessions in the following topic areas:

**Educational Sessions**
- Benefits of Homeownership
- Choosing a Home
- Locations
- Schools
- Daycare
- Transportation
- Neighborhood Amenities

**Financial Sessions**
- How much can I afford?
- Qualifying for a home
- Credit History
- Types of Loans
- Loan Programs
- Down-payment Assistance
- Closing Costs
- Fees
- Budgeting

**Homeownership Duties**
- Keeping Value in your home
- Maintenance/Upkeep
- Annual Home Inspections
- Taxes
- Homestead Exemption

DeKalb County Office of Workforce Development

Services include:
- Career Apprenticeship Job Training Programs
- Job Preparation
- Job Counseling
- Job Placement
- Job Follow-Up
- Access to Two “One Stop Career Centers”
- Welfare to Work Training including child care, transportation and life skills
**Families First**

*Services include:*

- Family Life Education & Counseling

**DeKalb County Cooperative Extension Service**

*Services include:*

- Mobility Counseling
- Master Gardening Program

**DeKalb County Department of Family and Children Services**

*Services include:*

- Child Care
- TANF Assistance
- Transportation
- Miscellaneous Expenses (help with eye-glasses, car repairs, etc.)

**DeKalb County Board of Health**

*Services include:*

- Physical Health Services including testing, screening, immunizations, exams
- Counseling
- Family Planning
- Health Promotion/Disease Prevention Services

**DeKalb County Office of Human and Community Development**

*Services include:*

- Down payment Assistance

**DeKalb County Community Service Board (Mental Health, Mental Retardation, and Substance Abuse)**

*Services include:*

- Addictive Disease Treatment including Substance Abuse
- Mental Health Treatment and Counseling
DeKalb County Schools

*Services include:*

- Parenting Classes
- Christmas Gift Donations

Georgia Department of Labor

*Services include:*

- Job Search Assistance
- Job Readiness Workshops
- Resume Preparation
- Career Search Planning
- Employment Counseling
- Labor Market Information
- Financial Management Workshops
- Vocational Rehab Training

Dress for Success

*Services include:*

- Job Search Assistance
- Professional Clothing for Interviews
- Job Readiness Workshops

Faith Based Partnerships

*Services include:*

- Learning Center (Day Care)
- Enrichment Program
- National Night Out
- Community Love Festival
- Angel Food Ministry
- Easter Bags
- Clothes (for needy)
- Shoes (for needy)
- Summer Camp
- Back to School Round Up
- Christmas Angel Tree
Scottdale Child Development and Family Resource Center

Services include:

- Child Development slots, ages 6 weeks to age 5 years old
- Family Support Services, including parenting classes
- Early Childhood Education
- Job and Skills Training in food services, grounds and maintenance

YMCA

Services include:

- A State Licensed After-school Program
- Aerobics and Fitness
- Summer Camp
- Mentoring Programs
- Youth and Adult Sports

XI. Assurances of Non-interference with the Rights of Non-participating Families

The HADC will ensure that a family’s eligibility for continued housing or their decision not to participate in the FSS Program does not affect their right to occupancy.

XII. Timetable for FSS Program

<table>
<thead>
<tr>
<th>Activity</th>
<th>Projected Start Date</th>
<th>Projected End Date</th>
<th>Projected Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orientations &amp; Interviews for Program</td>
<td>July 1, 2013</td>
<td>September 30, 2013</td>
<td>PCC in operation</td>
</tr>
<tr>
<td>Coordinating Committee (PCC)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completion of Action Plan</td>
<td>October 1, 2013</td>
<td>October 30, 2013</td>
<td>Action Plan complete and forwarded to HUD</td>
</tr>
<tr>
<td>Marketing/Enrollments for Participants</td>
<td>November 2013</td>
<td>On-going</td>
<td>Pool of active HCV participants</td>
</tr>
<tr>
<td>PCC Meetings</td>
<td>November 2013</td>
<td>Quarterly</td>
<td>Active PCC</td>
</tr>
<tr>
<td>FSS General Participants Meetings</td>
<td>December 2013</td>
<td>Quarterly</td>
<td>Active FSS participants</td>
</tr>
<tr>
<td>FSS Bridge Participants Meetings</td>
<td>December 2013</td>
<td>Quarterly</td>
<td>Active FSS participants</td>
</tr>
<tr>
<td>FSS Stepping Stone Meetings</td>
<td>December 2013</td>
<td>Quarterly</td>
<td>Active FSS participants</td>
</tr>
<tr>
<td>FSS Pathway to Independence Meetings</td>
<td>December 2013</td>
<td>Quarterly</td>
<td>Active FSS participants</td>
</tr>
</tbody>
</table>

XIII. Certification of Coordination

Certification between the HADC and respective service providers in the area to ensure that all available resources are utilized in order to prevent duplication of services and activities will be prepared, if needed
XIV. FSS Program Components

A. Initial Assessment

After a family is recruited and given an orientation, the head-of-household is assessed. The initial assessment tool is a series of questions designed to identify areas of need and concern in the individual’s life. It is composed of several sections: family composition, family health, education history, employment history, personal history, etc.

The information attained from the initial assessment is used to determine eligibility for the program and to develop the head-of-household’s Individual Training and Services Plan.

B. Contract of Participation

Once it can be determined that the FSS Program can provide the needed services identified by the initial assessment the head-of-household is required to sign a Contract of Participation (COP).

The purpose of the contract is to outline the responsibilities of the family and the role of the HADC. The term of the contract is five years and is valid beginning the first day of the month following the signing of the contract. The contract may be extended for an additional two years, if the family proves the need for additional time to become self-sufficient and is diligently working towards that goal. A contract may be terminated by the HADC if the family fails to meet its responsibilities outlined therein.

C. Individual Training and Services Plan

The Individual Training and Services Plan (ITSP) is a component of the COP. The ITSP outlines the participant’s interim and final goals, the steps, and supportive services needed to reach them, the parties responsible for achieving the goals, and a time frame in which they should be reached.

The participant will be held to this plan unless it is changed with the consent of the participant and the HADC. If a participating family is receiving any welfare assistance, they must be free of such assistance at least 12 months prior to the end of the contract.

XV. Termination Policy

HADC may terminate participating families from the FSS Program:

- If a participant acquires two unexcused absences (including personal counseling, required seminars, referrals, and class attendance) they will receive a notice of termination.

- If a participant underreports income or assets, they will not be granted retroactive escrow and they may be terminated from the Housing Choice Voucher and FSS Program due to failure to comply without good cause.

Other conditions for termination shall include mutual consent of both parties, expiration of the term of the contract and the family’s withdrawal from the FSS Program. Such determination may not be made until the Authority has given the client notice and an opportunity to respond.
The notice given to the family:

1. Shall be in writing to the participant.

2. Shall state that on certain grounds and for factual reasons to enable the family to prepare objections, that the family’s eligibility will terminate as of a date specified in the notice; but that the participant may request a hearing to appeal the decision.

3. Note, any proceeds contained in an Escrow Account are forfeited upon termination and will be credited to the HADC operating fund.

**XVI. Optional Information (For escrow participants)**

If a family owes rent or other amounts to the PHA or to another PHA they will be denied participation in the FSS Program.

If a previous participant or member of the participant's family was terminated from the FSS Program due to committing fraud, bribery or any other corrupt or criminal act in connection with any Federal Housing Program, they will not be given a second chance to participate in the FSS Program.

If a current home owner becomes unemployed, they will be required to meet with the FSS Clerk on a weekly basis and submit a list of twenty (20) employers per week until they are gainfully employed again.

If a HCV or Public Housing family has zero (0) income and wants to accumulate an FSS Escrow account, they will be required to enroll in the Job Readiness Program and meet with the FSS Clerk bi-weekly.

FSS participants may attend school/college on a part-time basis. Employment is a requirement for the FSS program. FSS participants **cannot** attend school/college and be unemployed. Part-time enrollment in School/ employment part-time is acceptable.

**XVII. Optional Information (For non-escrow participants)**

If a family owes rent or other amounts to the HADC or to another PHA they will be denied participation in the FSS Program.

If a previous participant or member of the participant's family was terminated from the FSS Program due to committing fraud, bribery or any other corrupt or criminal act in connection with any Federal Housing Program, they will not be given a second chance to participate in the FSS Program.

If a current home owner becomes unemployed, they will be required to meet with the FSS Clerk on a weekly basis and submit a list of twenty (20) employers per week until they are gainfully employed again.

All HCV or family who have zero (0) income or are minimum renters and enrolled in the FSS Program will be strongly encouraged to participate in the Job Readiness Program.
XVIII. Complaints and Appeals

1. The HADC will provide an opportunity for an informal hearing if FSS participation is terminated.
2. The participant may request an informal hearing in writing within ten days of written notification by
   the HADC of ineligibility and/or termination.
3. A third party hearing officer will conduct the hearing.
4. The hearing officer will notify the family in writing within ten (10) days stating the reason for the
   decision via certified mail.
5. At the family's expense, a lawyer or other representative may represent them.
6. The HADC and family shall be given the opportunity to present evidence and question any
   witness.