



FAMILY SELF SUFFICIENCY ACTION PLAN

April 3, 2023

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1. INTRODUCTION

This document constitutes the Family Self Sufficiency (FSS) Program Action Plan for the FSS program operated by Johnstown Housing Authority. It was submitted to HUD on April 3, 2023.

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.

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.

This FSS Action Plan describes the Johnstown Housing Authority'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.

The FSS program and the functions and responsibilities of PHA staff are consistent with the Johnstown Housing Authority's personnel policy and Agency Plan.

2. PROGRAM OBJECTIVES

Johnstown Housing Authority's FSS program seeks to help families make progress toward economic security by supporting the family's efforts to:

- Increase their earned income
- Build financial capability
- Achieve their financial goals
- Become a self-sufficient family
- Reduce dependency of welfare assistance

To maintain these goals Johnstown Housing Authority will network with existing community services, GED programs, vocational schools, transportation services, clothing assistance services and other local businesses and partnerships to help FSS participants obtain and maintain employment.

3. a FAMILY DEMOGRAPHICS

Johnstown Housing Authority's FSS program will serve the following housing assistance programs:

- Public Housing,
- Housing Choice Vouchers (HCV): Tenant-Based Vouchers
- Housing Choice Vouchers (HCV): Other special purpose vouchers (e.g. FUP, FUP-Y, FYI, VASH, EHV, etc.)

The Johnstown Housing Authority houses 1,434 individuals in Public Housing homes that would qualify for the FSS program. Of these 1,434 individuals, 48% are African American, 49% are White, 3% are White and African American only and 2% are Hispanic or Latino.

The Johnstown Housing Authority assists 781 individuals that participate in the Section 8 Housing Choice Voucher Program that would qualify for the FSS program. Of these 781 individuals, 34% are African American, 64% are White, 2% are White and African American and 11% are Hispanic or Latino.

3. b SUPPORTIVE SERVICES NEEDS OF FAMILIES EXPECTED TO PARTICIPATE

- Interview preparation
- Training in basic skills and executive function (including household management)
- Employment training, including sectoral training and contextualized and/or accelerate basic skills instruction
- Job placement assistance
- GED preparation
- Higher education guidance and support
- English as a Second Language
- Assistance accessing and paying for child care
- 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

3. c ESTIMATE OF PARTICIPATING FAMILIES

Over time, Johnstown Housing Authority 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.

During the initial five years of the FSS program, Johnstown Housing Authority expects to be able to provide FSS services to 50 families. This is based on the assumption that 80% of families will graduate in this time and 20% of families will leave the program each year for other reasons, with new families being enrolled as these families exit.

To encourage families to participate and complete the program, Johnstown Housing Authority will include incentives to help individuals succeed within the program. Monthly newsletters will be sent to each participating family sharing successes within the program, free or low cost activities to engage in within the community, workshops being offered through Johnstown Housing Authority for FSS participants and resources participants may be interested in utilizing. The FSS coordinator will also provide emotional support, frequent check ins and anonymous surveys to help engage FSS participants and encourage their feedback.

3. d OTHER SELF SUFFICIENCY PROGRAMS

The Johnstown Housing Authority does not provide any other self-sufficiency programs.

4. a FAMILY SELECTION PROCEDURES

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 of their application.

The FSS program has not adopted any admissions preferences. Families will be selected based on the date the family expressed an interest in participating in the FSS program.

4. b Screening for motivation

The Johnstown Housing Authority 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: The Johnstown Housing Authority 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, provision of transportation to/from the orientation site, translation services, an alternative location, a virtual orientation session, or allowance and encouragement to bring children to the session, where possible.

4. c Compliance with nondiscrimination policies

It is the policy of Johnstown Housing Authority 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, Johnstown Housing Authority'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.

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, Johnstown Housing Authority will select families for participation in the FSS program in accordance with FSS Regulations and HUD guidelines.

4. d Re-enrollment of prior FSS participants

Families who were enrolled in FSS in another jurisdiction may re-enroll through Johnstown Housing Authority.

4. e Head of FSS family

The head of the FSS family is designated by the participating family. The Johnstown Housing Authority may make itself available to consult with families on this decision but it is the assisted household that chooses the head of the 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 Johnstown Housing Authority in writing.

5. Outreach

The Johnstown Housing Authority will conduct widespread outreach to encourage enrollment in the FSS program. Outreach efforts will include the activities identified below. Interpreters will be used as needed and clients may contact staff to express interest in person, via telephone or by email.

Outreach Method	Details
<ul style="list-style-type: none"> Posting information about FSS on Johnstown Housing Authority's website and mobile application. 	This information will include contact information of the FSS coordinator and will remain posted as long as the program is available.
<ul style="list-style-type: none"> Posting FSS program flyers in locations eligible families will be likely to see 	This will be done monthly with updates to the program.
<ul style="list-style-type: none"> Providing information about FSS during scheduled redeterminations 	This will be done during each redetermination meeting.
<ul style="list-style-type: none"> Sending out brochures to qualifying residents about the program 	This will be done monthly to show families the program is still available.
<ul style="list-style-type: none"> Holding well publicized meetings informing families about FSS 	Meetings will take place based on the availability of resources at Johnstown Housing Authority.
<ul style="list-style-type: none"> Facebook 	The FSS program will have its own Facebook page where success stories, meeting information, tips and tricks to maintain a self-sufficient household and many other pieces of information will be posted and updated daily.
<ul style="list-style-type: none"> Instagram 	The FSS program will have its own Instagram account where the public can see how the program is developing, growing and building.

Outreach informational material about the FSS Program will include:

- Program overview
- Program benefits
- Available resources
- Participant responsibilities
- Program outcomes

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 Johnstown Housing Authority will account for the needs of persons 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.

6. FSS Escrow Account and Other Incentives for Participants

Other Opportunities Presented

FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account. While the Johnstown Housing Authority'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, which can be very valuable for FSS program participants

Interim Disbursements

The Johnstown Housing Authority will allow for interim disbursements on a case-by-case basis. Families may request an interim disbursement from the escrow account 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 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. The FSS Coordinator and an administrative representative of the Johnstown Housing Authority will make a determination of whether the family qualifies for the requested interim disbursement on a case-by-case basis. The FSS coordinator will first explore options for services and in-kind donations from partners, which must be exhausted before a request for an interim disbursement will be approved.

Uses of Forfeited Escrow Funds

FSS escrow account 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 and a member of the PCC will consider the available funds and make a determination. The Johnstown Housing Authority may also initiate a request for the use of forfeited escrow funds. Forfeited escrow funds may not be considered as a substitute for an interim escrow disbursement.

7. Family Activities and Support Services

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 participant’s access appropriate services to help them achieve their goals:

Supportive Service Category	Specific Service	Source/Partner
Assessment	Vocational Assessment Educational Assessment Disability Assessment Disability Other specialized assessments	Goodwill Industries Greater Johnstown Career and Technology Center Hiram G. Andrews Center Cambria County BH/ID/EI
Child Care	Infant Care / Toddler Care Preschool Care Afterschool Care Homework Assistance	Community Action Partnership of Cambria County Local School Districts
Transportation	Bus passes	Cam Tran
Education	High School Equivalency/GED English as a Second Language Post-secondary certificates Advanced Degrees	Goodwill Industries Pennsylvania Highlands Community College Mount Aloysius College University of Pittsburgh Johnstown
Skills Training	Training in Executive Function Basic Skills Training Emerging Technologies Training Biomedical Training (including CNA, phlebotomy, x-ray and other tech, etc.)	Greater Johnstown Career and Technology Center JARI L & D Cosmetology School

	On-the-Job Training Apprenticeships Skilled Labor training	Conemaugh Memorial Medical Center School
Job Search Assistance	Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement	JARI Career Link Goodwill Industries
Micro and Small Business Development	Small business development services Small business Mentoring Entrepreneurship Training	JARI City Of Johnstown
Health/Mental Health Care	Alcohol and Drug Abuse Prevention Alcohol and Drug Abuse Treatment Primary care Dental services Mental Health Services Health Insurance Advising	Cambria County Probation Cambria County Behavioral Health Services Richland Family Health Center Highlands Health Cambria County Assistance Office
Crisis Services	Crisis Assessment Crisis Intervention Crisis Management Crisis Resolution	The Women's Help Center Victim Services Peer Empowerment
Child/Adult Protective Services	Needs Assessment Case Planning Information Referral	Children in Youth Services The Women's Help Center Adult Protective Services
Household Management	Training in Household Management	JARI Career Link Pennsylvania Highlands Community College
Homeownership Preparation	Homeownership Education Housing Counseling Down payment Assistance Other Homeownership Assistance	Local Banks

Financial Empowerment	Financial education Financial coaching Banking services Training in money management	Local Banks Local Vocational Schools
Legal Services	Legal Services	Legal Aid
Debt Resolution & Credit Repair	Assistance negotiating the resolution of past-due debt	Local Banks

8. 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

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 referrals to appropriate service providers.
- Overcome obstacles in the way of achieving a family's goals.

9. Contract of Participation

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 Johnstown Housing Authority's policies and practices regarding the CoP.

A. Form and content of contract

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 Johnstown Housing Authority, 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.

B. ITSP goals

Each individual's ITSP will establish specific interim and final goals by which the Johnstown Housing Authority 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 Johnstown Housing Authority 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 the 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.

C. Determination of suitable employment

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 Johnstown Housing Authority, 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.

D. Contract of participation term and extensions

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. Johnstown Housing Authority will grant the extension if it finds that good cause exists to do so. In this context, good cause means:

- (i) Circumstances beyond the control of the FSS family, as determined by the Johnstown Housing Authority 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 Johnstown Housing Authority.

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 Johnstown Housing Authority will accept the following form of verification for completion of the ITSP goals:

- Johnstown Housing Authority will require a combination of self-certification and third-party verification to document completion of ITSP goals.

F. Modification

The Johnstown housing Authority 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 Johnstown Housing Authority as well as the Head of FSS Family.

Johnstown Housing Authority will allow for modifications to the CoP under the following circumstances:

- 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 Johnstown Housing Authority designate another family member to be the FSS head of family

The Johnstown Housing Authority will allow modifications to the CoP if the request is made before 90 days prior to the end of the term.

G. Consequences of noncompliance with the contract

Participant non-compliance with the CoP will result in termination of the FSS program.

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

A. Involuntary termination

Johnstown Housing Authority may involuntarily terminate a family from the FSS Program under the following circumstances:

- 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:
 - (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
 - (iv) If the participant's housing assistance has been terminated.

Participants who fail to meet their obligations under the above paragraph, as determined by an FSS coordinator, will be given the opportunity to attend a required

meeting with the FSS Coordinator or assigned Johnstown Housing Authority 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 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.

If the initial meeting does not resolve the problem, or if the family does not request the meeting within the required period, notification of termination will be made to the family by letter stating:

- (i) The specific facts and reasons for termination;
- (ii) A statement informing the family of their right to request an informal hearing and the date by which this request must be received (see Grievance Procedures);
- (iii) 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.

B. Voluntary Termination

Participants may also be terminated from the FSS program under the following circumstances:

- Mutual consent of both parties; and/or The family's withdrawal from the program

C. Grievance Procedures

The Johnstown Housing Authority Coordinator must receive all requests for an informal hearing 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 will not be limited to:

- The FSS head of household
- The FSS Coordinator
- Johnstown Housing Authority staff members, other than FSS program staff, serving as the Hearing Officer(s)

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. 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 Johnstown Housing Authority within 24 hours of the scheduled hearing date, excluding weekends and holidays. Johnstown Housing Authority 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 Johnstown Housing Authority 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.

11. 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 Johnstown Housing Authority's decision of whether to admit the family into Public Housing or Section 8 Housing Choice Voucher 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. Johnstown Housing Authority will ensure that the voluntary nature of FSS program participation is clearly stated in all FSS outreach and recruitment efforts.

12. Timetable

Johnstown Housing Authority will be implementing its FSS program in the following timeline:

Program begins

The FSS program will commence operation as soon as the Johnstown Housing Authority has received notification of HUD's approval of the Action Plan.

Program Coordinating Committee

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.

Outreach

Within 90 days of program launch, outreach efforts will commence, as described above in the Outreach section.

Participant Selection

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.

Contract Execution

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.

Full Enrollment

The FSS program expects to reach full capacity within 6 months of program launch.

Program Maintenance

The FSS program expects to operate at full capacity thereafter, subject to normal fluctuations related to families leaving and entering the program.

13. Reasonable Accommodations, Effective Communications and Limited English Proficiency

Requests for Reasonable Accommodations

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.

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 to Johnstown Housing Authority Directly.

Request for Effective Communications

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.

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 to Johnstown Housing Authority directly.

Limited English Proficiency

The Johnstown Housing Authority 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 on services provided and offered visit JHAonline.org.

14. 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, childcare, 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 planning 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.

The PCC will meet monthly 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 each HUD rental assistance program served by the FSS program.
3. Representatives from a variety of agencies and individuals, which include but are not limited to the following:
 - JARI, Pennsylvania Highlands Community College, Career Link, Goodwill, CamTran and many more.

15. Portability

A. Portability in the initial 12 months

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

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 Johnstown Housing Authority’s FSS program unless the Johnstown Housing Authority 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 the Johnstown Housing Authority is able to receive an incoming family from another jurisdiction into the FSS program, the Johnstown Housing Authority 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 into a jurisdiction that does not offer an FSS program, Johnstown Housing Authority 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.

Where continued FSS participation is not possible, Johnstown Housing Authority 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.

16. Other Policies

Policy	Where Addressed in Plan
(i) Policies related to the modification of goals in the ITSP;	Section 9 Contract of Participation
(ii) The circumstances in which an extension of the Contract of Participation may be granted	Section 9: Contract of Participation
(iii) Policies on the interim disbursement of escrow, including limitations on the use of the funds (if any)	Section 6: FSS Escrow Account and Other Incentives for Participants

(iv) Policies regarding eligible uses of forfeited escrow funds by families in good standing	Section 6: FSS Escrow Account and Other Incentives for Participants
(v) Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating	Section 4. Family Selection Procedures
(vi) Policies on requirements for documentation for goal completion;	Section 9: Contract of Participation
(vii) Policies on documentation of the household's designation of the "Head of FSS Household;	Section 4. Family Selection Procedures
(viii) Policies for providing an FSS selection preference for porting families (if the PHA elects to offer such a preference)	Section 4: Family Selection Procedures

17. 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 Johnstown Housing Authority as may be required under this part, and which:

- (1) Shall be maintained by Johnstown Housing Authority 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, Johnstown Housing Authority and the public, as appropriate; and,
- (3) Shall be deemed to be accurate for purposes of this part, unless the Secretary or Johnstown Housing Authority, 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 Johnstown Housing Authority 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 Johnstown Housing Authority 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 Johnstown Housing Authority.

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 Johnstown Housing Authority 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 Johnstown Housing Authority; and is in compliance with the regulations regarding participation in the relevant rental assistance program.

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 Johnstown Housing Authority 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 Johnstown Housing Authority 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 Johnstown Housing Authority 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) Nonrecurring, 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 based on the child's need and not on the need of the child's current non-parental caretaker.