

**2020 ADMINISTRATIVE PLAN/ACOP
INDIVIDUAL WAIVERS IMPLEMENTED BASED ON PIH NOTICES 2020-05 AND
2020-13**

The Board of the Parma Public Housing Agency, at the May 19, 2020 meeting adopted PIH Notice 2020-05, dated April 10, 2020, which listed all waivers that the Department of Housing and Urban Development authorized in order for public housing agencies to continue to process any/all necessary requirements to operate throughout the pandemic. PIH Notice 2020-13, dated July 2, 2020, was issued with additional waivers and requirements as a supplemental.

Parma PHA has elected to utilize the following individual waivers and this document will be included with the 2020 and 2021 Administrative Plan, ACOP and Annual Plan.

Included and not specifically listed in the waivers are any/all changes and modifications to the Administrative Plan, ACOP and annual Plan.

ADMINISTRATIVE PLAN

Chapter 5 – Administrative Plan – Briefings and Voucher Issuance

HCV Family Oral Briefing (982.301(a)(1), 983.252(a)– PPHA will adopt at its discretion alternative ways to hold oral briefings of new clients, such as using Zoom in a group session and Telephone, one on one with new applicants from the HCV waitlist.

Chapter 7 – Administrative Plan – Verification

HUD's Verification Hierarchy will be utilized when possible. We have moved to modify the income hierarchy by accepting client certification of income, but will continue to utilize EIV reports when and where necessary. The PHA reserves the right to utilize other forms of income verification.

Chapter 8 – Housing Quality Standards

HQS Quality Control Inspections (HCV) – Requires supervisory quality control inspections of a sampling of units under contract. This practice has been suspended through December 31, 2020. If HUD extends the waiver period, this will roll into 2021.

HQS Annual/Interim Inspections (HCV) – 8-II.C Parma PHA has adopted Biennial Inspections as authorized by both notices 2020-05 and 2020-13, which was updated with further guidance. We will, however, reserve the right to conduct an inspection on any contracted unit within the annual/biennial period. Parma PHA will continue to inspect “new” units being offered for contracting purposes as long as the unit is not occupied before contracting with the agency. We will adopt alternative methods of ensuring HQS compliance by using videos, pictures, copies of receipts for repairs and written documentation from property owners.

Unit Inspections (Public Housing) – We have adopted performing only emergency inspections through December 31, 2020.

Chapter 11 – Administrative Plan - Reexaminations

Annual/Interim client reexams (HCV/PH) – All annual/interims have been conducted via mail-in and will continue.

Chapter 12 – Termination of Assistance and Tenancy

Absence from the Unit

The PHA will consider absences from the unit (of all family members) beyond the 60-day period.

Chapter 18 – Family Self-Sufficiency

Family Self Sufficiency – PPA will adopt the option of providing for contract extensions as needed for families impacted by the Pandemic. PPHA will research its FSS Family base to determine if any family requires the approval of an extension in completing their FSS contract. If extension requests are related to the Pandemic, contracts of participation will be extended for a period agreed upon by the family and the agency.

ACOP

Chapter 9 – Reexams –

Annual/Interim client reexams (HCV/PH) – All annual/interims have been conducted via mail-in and will continue.

Chapter 7 – Verification

HUD's Verification Hierarchy will be utilized when possible. We have moved to modify the income hierarchy by accepting client certification of income, but will continue to utilize EIV reports when and where necessary. The PHA reserves the right to utilize other forms of income verification.

Chapter 8 – Inspections

Parma Public Housing is implementing modified inspections, vs. annual unit inspections. With the exception of emergencies, (i.e. water leaks, electrical issues, plumbing issues), we will only enter units on an as needed basis. If it is necessary to conduct additional inspections, we will implement alternate methods, such as video-type/Zoom inspections.

Chapter 11 – Community Service

Parma Public Housing is suspending the requirement of community Service through December 31, 2021.

Administrative Plan -Table of Contents

Chapter 18 FAMILY SELF SUFFICIENCY

PART I:	PHILOSOPHY	18-1
PART II:	POLICY	18-1
PART III:	FSS PROGRAM OBJECTIVES	18-1
	18:III.A. Overall Plan Of The FSS Program	18-1
	18:III-B: Standards For Completion Of The FSS Contract Of Participation	18-2
PART IV:	RECRUITMENT AND SELECTION	18-2
	18:IV.A. Outreach Procedures.....	18-2
	18:IV.B. Recruitment Of Participants	18-2
	18:IV.C. Selection Of Participants	18-3
	18:IV.D. Eligibility For FSS.....	18-3
PART V:	ASSESSMENT AND GOAL DEVELOPMENT	18-4
	18:V.A. Information Assessment	18-4
	18:V.B. Goal Development And Planning	18-5
	18:V.C. Annual Review.....	18-6
PART VI:	RECERTIFICATIONS.....	18-7
PART VII:	INCENTIVES - INCLUDING ESCROW CLARIFICATION.....	18-7
PART VIII:	CONSEQUENCES OF NONCOMPLIANCE WITH FSS CONTRACT OF PARTICIPATION.....	18-8
PART IX:	PORTABILITY OF FSS CONTRACT AND ESCROW ACCOUNT	18-9
PART X:	CONTRACT COMPLETION.....	18-10
PART XI:	CONTRACT EXTENSIONS	18-10
PART XII:	NETWORKING IN THE COMMUNITY	18-11
	18-XII.A. Activities.....	18-11
PART XIII:	PROGRAM COORDINATING COMMITTEE (PCC).....	18-11
	18-XIII.A. Agency Partnerships.....	18-11
	18-XIII.B. Coordination Of Services	18-11
PART XIV:	DATA TO BE MAINTAINED.....	18-11
PART XV:	FINAL GOAL FOR EACH FAMILY WHO JOINS FSS	18-12
	18-XV.A. Employment.....	18-12
	18-XV.B. Early Contract Completion	18-12
	18-XV.C. Completion Of The Contract Of Participation.....	18-13
PART XVI:	TIMETABLE FOR PROGRAM IMPLEMENTATION.....	18-13
PART XVII:	AFFIRMATIVELY FURTHERING FAIR HOUSING.....	18-14
PART XVIII:	RECORDS FOR MONITORING PPHA PERFORMANCE	18-18

CHAPTER 18

FAMILY SELF SUFFICIENCY

[24 CFR 984]

PART I: PHILOSOPHY

The overall goal of the Family Self Sufficiency (FSS) Program is to promote economic self-sufficiency to program participants through partnerships with Social Service Providers in Cuyahoga County.

PART II: POLICY

Family Self Sufficiency staff will work with participating families to identify their strengths and barriers. Together they will establish goals that lay the foundation for the families to achieve economic self-sufficiency.

PART III: FSS PROGRAM OBJECTIVES

18:III.A. OVERALL PLAN OF THE FSS PROGRAM

- Introduce FSS to all families who are eligible to participate with the understanding that the commitment to change "begins from within."
- Implement a needs assessment to identify each family's strengths and barriers. Establish interim goals that lay the foundation for the final goals of economic self-sufficiency of each family joining FSS.

18:III-B: PPHA'S STANDARDS FOR COMPLETION OF THE FSS CONTRACT OF PARTICIPATION

- To become independent of TANF assistance and remain independent for 12 consecutive months before the FSS Contract expires.
- To be in good standing with no current or anticipated debt to either the Housing Choice Voucher (HCV) Program or the Landlord.
- To seek and maintain suitable employment based on the skills, education and job training of that individual and available job opportunities in the area.
- To complete the Individual Service Plan goals set by the participant.
- Establish interagency partnerships to achieve high quality and comprehensive service delivery to all members of a family with long-term results.
- The FSS Coordinator will meet with the FSS participants on an annual basis to review goals and to assess the accountability of the families and the agencies

involved but will contact the participant throughout the year to ensure any potential issues are resolved or assistance is provided prior to the expiration of the Contract of Participation.

18:III-C: FAMILY OBJECTIVES

The overall plan for the family participating in FSS is to achieve the following objectives:

- Begin to recognize the connection between self-perceptions and self-imposed limitations. By learning that thoughts can shape and form one's life, the prescription for success is to "begin within."
- Achieve a greater level of self-discipline, self-esteem and self-motivation by accepting responsibility for decisions and actions.
- Demonstrate commitment and accountability to the Individual Training and Services Plan in which both goals and barriers are assessed.

PART IV: RECRUITMENT AND SELECTION

18:IV.A. OUTREACH PROCEDURES

- Recruiting must remain an ongoing effort. FSS is not a one time "take it or leave it" offer. The entire staff is encouraged to promote FSS during daily contact with families.
- FSS staff will conduct outreach that will provide HCV program participants information and an opportunity to participate with the FSS program.

18:IV.B. RECRUITMENT OF PARTICIPANTS

- After the initial Briefing that offers FSS, the Housing Specialist will also offer FSS to every HCV Program tenant during his/her initial enrollment, recertification, interim, and/or transfer.
- Family Self- Sufficiency staff will explain the benefits of the program to each potential FSS participant who wishes to meet with FSS staff to learn more about the program.
- The FSS program will also be explained to interested HCV Program tenants who call and express an interest in learning more about the program.
- If the tenant desires to enroll in the program, he/she will meet with a Family Self Sufficiency staff person to complete the Family Self-Sufficiency Assessment Form.
- The FSS Contract will be explained and completed during the face-to-face interview. The FSS staff will attend various community events providing

information about the program including holding monthly informational sessions for HCV program participants.

18:IV.C. SELECTION OF PARTICIPANTS

- Housing assistance shall not be delayed to an applicant for HCV Program on the basis that the applicant elects not to participate in FSS at the time it is introduced.
- Both current participants and those who attend briefings represent all minority and non-minority groups, there is no attempt to recruit or exclude any person on the basis of race, color, sex, religion, creed, national or ethnic origin, age, to actual or perceived sexual orientation, gender identity, familial or marital status, handicap or disability.
- Families selected include current HCV Program participants as well as from Project Based Assistance.

18:IV.D. ELIGIBILITY FOR FSS

Every effort is made to promote the FSS concept to those least likely to participate as well as those already involved in FSS type activities. By using a self-select approach, the emphasis is for families to express a commitment to change by joining FSS.

8:IV.D.1. ELIGIBILITY FACTORS

- Families (including individuals) who qualify for any bedroom size will be eligible.
- PPHA may screen families for interest, and motivation to participate in the FSS program, provided that the factors utilized by the PHA are those which solely measure the family's interest, and motivation to participate in the FSS program. Permissible motivational screening may include assigning certain tasks which indicate the family's willingness to undertake the obligations which may be imposed by the FSS contract of participation. (CFR 984.203)
- In the event a family joined FSS and then left the HCV Program, later, if they return to the HCV Program, the family may be eligible to rejoin the FSS Program after a period of 12 months (from the date they left FSS) for good cause. Good Cause means circumstances beyond the control of the FSS family as determined by the PHA such as:
 - Death of immediate family member;
 - Serious illness of participant or immediate family member
 - Involuntary loss of employment

In this situation, no monies in escrow from the previous contract are transferable.

- In the event a family does not complete their FSS Contract and remains on the HCV Program, the family may be eligible to rejoin the FSS Program after a period of 12 months (from the date the FSS contract expired) for good cause (as defined above).
- If a family previously joined the FSS Program, did not meet its obligations and was terminated from FSS, the family may be denied future participation in FSS.

18:IV.D.2. MOTIVATIONAL FACTORS

- Motivational screening may include tasks that are readily accomplishable by the family in order to measure the family's interest to participate.
- Willingness to learn about FSS.
- Willingness to keep appointments for enrollment and annual reviews in the FSS Program.
- Demonstrated commitment to the Individual Training and Services Plan that establishes short-range and long-range goals.
- Completion of specific tasks including contacting job training or educational programs or actively seeking employment.
- Willingness to sign a release of information for other agencies to have access to file information.
- Willingness to provide information and/or meet with FSS as is deemed necessary regarding the family's participation in FSS, including documenting how the family worked toward specific FSS goals.

PART V: ASSESSMENT AND GOAL DEVELOPMENT

18:V.A. INFORMATION ASSESSMENT

- The FSS staff person will review the Assessment Form with the enrollee to identify client strengths and determine areas of interest.
- The FSS staff person will evaluate current client support systems and possible educational and training needs.
- With the FSS focus of achieving economic self-sufficiency through employment and continued career development, FSS staff will identify support services that may reduce the dependency of low-income families on welfare assistance and on HCV Program.

- The topics which will be explored in the Family Self-Sufficiency Assessment Form are: Child/Dependent Care, Social Systems, Health, Legal Issues, Understanding and improving credit, Budgeting, Transportation, Housing, Education/Training and Employment. These categories have been identified as areas upon which families begin the process of setting goals and developing an individual plan by which to become self-sufficient.
- Resources and referrals will be provided to FSS participants based upon areas of need identified on the Assessment Form.

18:V.B. GOAL DEVELOPMENT AND PLANNING

- With supportive counseling from FSS staff, each participant will be asked to work with FSS to develop an Individual Training and Services Plan by learning to set SMART goals, a goal-setting strategy developed by other professional coaches that meet the following standards:
 - Specific** – Identify the exact goal the family wants to achieve so the staff can help to breakdown what steps are involved, including possible available community resources.
 - Measurable** – The goal must be concise so that progress can be determined and evaluated.
 - Attainable** – The goal must be achievable within a set time frame.
 - Realistic** – The goal must be practical and have a positive impact on the present or future economic status of the family.
 - Targeted** – A clear goal encourages focus and follow through.
- The FSS staff person will assist the family to break down their long-term goals into manageable steps.
- In the first year of the FSS Contract, the family will be asked to identify 1-2 specific goals in order to start to accomplish the long-range goals of self-sufficiency. Sub- goals will be identified as active steps to lead to the goal to be accomplished during the first year. The participant will receive a copy of the Individual Training and Services Plan and the FSS Contract. The FSS staff person will explain the requirement to meet with FSS staff on an annual basis in order to review completion of their annual goals. The annual review for FSS will likely coincide with the family's annual recertification.

18:V.C. ANNUAL REVIEW

- The Family Self-Sufficiency staff will review both HUD's mandatory goals to successfully complete the program and the specific goals relevant to the family as listed on the Individual Training and Services Plan. In addition, the family will be provided with a statement that indicates the balance of the current escrow account.
- The participant's goals will be reviewed and the family will work with FSS staff to set goals for the following year. The participant will have an opportunity to amend their goals at the discretion of the FSS staff. The FSS staff person will again assist the participant to set goals that are sufficiently specific and concrete so that the goals are measurable. Available resources will be provided as necessary.
- During the Annual Review, the participant will also complete the HUD 50058 FSS Addendum. The participant will be reminded to return the following year to update and review goals until the contract expires or the family completes the FSS Contract (whichever occurs first). The participant will receive a detailed breakout of their escrow account at their annual review.
- PPHA will send written notification of the FSS annual review appointment to the participant. The appointment should coordinate with the HCV recertification appointment. If a participant fail to attend the annual review appointment, PPHA will notify them in writing of a rescheduled time. If the participant fails to come in to the rescheduled appointment or notify the FSS coordinator to make arrangements within 10 days of date of the re-schedule letter, PPHA will:
 - Send the family notice of termination from the FSS program.
 - Exceptions to these policies may be made by the FSS Coordinator if the family is able to document an emergency situation that prevented them from completing the annual review or if requested as a reasonable accommodation for a person with disability.
- FSS staff will contact participants throughout their contract to ensure they are on target to meet their goals. FSS participants are also encouraged to contact FSS staff throughout the contract, if assistance is needed, in obtaining an established goals or assistance in obtaining linkages to social service providers.

PART VI: RECERTIFICATIONS

- In order to assist FSS families with overcoming the barriers to economic self-sufficiency, the FSS staff will conduct both Annual Recertification/Reexaminations as well as Interim income changes for HCV clients who participate in the FSS program. The Recertifications will be completed at the same time as the FSS Annual Review. This process will continue as long as it does not interfere with general FSS job duties.
- The Family Self Sufficiency staff will follow the same policies and procedures established in Chapter 11 in reference to HCV Reexaminations and reporting Interim changes to income.
- When the recertification appointments are being scheduled, the FSS staff will review the list to assure accuracy in scheduling FSS participants. The review will be completed prior to mailing the appointment letter notifying the family of their scheduled date and time. This review will confirm the participant has an active FSS contract and will be seen by an FSS coordinator. If a participant notifies the FSS staff, at the scheduled appointment, that they no longer wish to participate in the FSS program, the FSS staff will complete the Recertification before returning the file to the HCV clerk to re-assign the file to the appropriate housing specialist.

PART VII: INCENTIVES - INCLUDING ESCROW CLARIFICATION

- To encourage participation in FSS, every effort will be made to collaborate with other agencies, companies and persons to identify resources that will benefit or enhance a family's life as they progress toward the goal of economic self-sufficiency.
- Incentives may include:
 - Identifying volunteer activities in the community relevant to the family's goals. Resume service (by referral).
 - Internet access to search for jobs, scholarships and other information.
 - Making job referrals and also references for those families the FSS staff comes to know.
 - Scholarship opportunities, including writing letters of recommendation
 - Assistance in completion of various applications for school enrollment and/or funds.
- Establishing the escrow account and allowing interim disbursement of a portion of the family's escrow account during the Contract period for expenses deemed by FSS to be consistent with the goals of the family's Individual Training and Services Plan. Such needs may include, but are not limited to, the following:
 - School tuition or other education related expenses Job training expenses
 - Business start-up expenses Transportation

- The following limitations apply for partial disbursements:
 - Withdrawals can be made only once during a 12-month period.
 - No more than 50% of the total amount in escrow may be withdrawn (exception to this % may be considered).
 - Payment to be made either to the family or to a pre-approved third party when possible.
 - Receipt(s) must be submitted after purchase has been made. Limit of three payments per withdrawal request.
- At the end of each month, the FSS department will verify the monthly amount being deposited into the escrow account for accuracy. No monthly deposit will be made to a family's escrow account if the FSS family has not paid the family contribution towards rent.

PART VIII: CONSEQUENCES OF NONCOMPLIANCE WITH FSS CONTRACT OF PARTICIPATION

- Families are required to meet with FSS staff on an annual basis in order to review progress and/or completion of the most recent annual goals listed on the Individual Training and Services Plan. A staff person will assess the FSS participant's current situation to set short-term goals with the family for the next twelve months. These short-term goals will be summarized on the Individual Training and Services Plan as part of the family's FSS Contract. The following corrective actions will be taken in order of progression to determine if the FSS Contract will remain in effect:
 - The offer to counsel the family to update interim goals and review what activities or services would be appropriate.
 - Notification in writing that supportive services will be withheld until family initiates or follows through on activities consistent with the FSS goal.
 - Notification in writing of our intention to terminate the FSS Contract will include the right to an informal hearing.
- Penalties for FSS action to terminate FSS Contract include:
 - Termination of supportive services.
 - Forfeiture of amount in FSS escrow savings account. PPHA has final discretion to award or withdraw participants' escrow funds.
 - Family would not be eligible to rejoin FSS Program for a period of 12 months and then only if the family can demonstrate that they are ready to commit to FSS goals and objectives.

- PPHA will not terminate HCV Program assistance as a consequence of termination of the FSS Contract of Participation. Family may continue to receive HCV Program subsidies according to the terms of the Voucher and Lease/Contract in effect.
- FSS and the family may mutually agree to terminate the FSS Contract. The same terms apply as listed under penalties.
- If the FSS family owes any money to PPHA's HCV program, the forfeited FSS account shall be reduced by that amount to pay the debt. Any deductions made from the account for amounts due to PPHA will be made before interest is distributed.

PART IX: PORTABILITY OF FSS CONTRACT AND ESCROW ACCOUNT

- The family must comply with the family obligations under the HCV program and live in the jurisdiction of the PHA that enrolled the family in the FSS program at least 12 months from the effective date of the contract, unless the initial PHA approves the family's request to move outside its jurisdiction under portability. If eligible for portability, PPHA may take one of the following actions:
 - As the initial PHA, PPHA may permit the family to continue to participate in our FSS Program if the family demonstrates it can meet its FSS goals and responsibilities in its new location. This option is available when the voucher is administered by the receiving PHA. Cooperation of the receiving PHA is needed to confirm accuracy of deposits PPHA would make in the escrow account.
 - As the initial PHA, PPHA may permit an early completion of the FSS Contract by the family due to the complexity of maintaining the escrow account and the difficulty in coordinating services for families who do not live within our jurisdiction.
 - As the initial PHA, PPHA may terminate the FSS Contract in cases where the family cannot fulfill its obligations in the new location, or if the receiving PHA does not allow the family to participate in its FSS Program. In either of these cases, the family would forfeit the funds in the escrow account.
 - As the receiving PHA, PPHA may absorb the FSS Contract when the Voucher is absorbed. Any monies in the escrow savings account would be transferred from the initial PHA to the receiving PHA.
 - It is the responsibility of the family to notify the FSS staff in writing of their plans to port. Failure to do so may result in termination from the FSS program and forfeiture of any escrow monies.

PART X: CONTRACT COMPLETION

- The Family Self-Sufficiency staff will review the family's status relative to the goals listed in the Individual Training and Services Plan and the HUD mandated goals in the FSS Contract to determine whether the family has successfully completed the FSS Contract.
- All participants will be asked to complete an Exit Survey.
- Participants who have funds in the escrow account will also complete the Application for Withdrawal of Escrow Accounts form. Upon review of the request for escrow funds, the Family Self-Sufficiency staff will determine whether to recommend that the escrow funds be released to the family.
- The staff will process the request for payment of escrow for those participants who have achieved PPHA's standards for completion of the FSS Contract (listed on page one). This is accomplished by working with the family to set annual goals in the Individual Training and Services Plan that encourage the family to move toward personal and program goals of self-sufficiency.

PART XI: CONTRACT EXTENSIONS

- The initial contract term is five years. The contract may be extended, in writing, and at the family's request, for up to two additional years for good cause. Good cause means circumstances beyond the control of the FSS family, as determined by the PHA such as:
 - Serious illness
 - Involuntary loss of employment
- The PHA should only grant extensions in rare circumstances that are beyond the control of the family, and which prevent completion of the ITSP.
- Termination of employment for non- performance by the FSS head is not justification for a contract extension.
- PHA's may extend the contract to allow families to meet the interim goal of being welfare free at least 12 consecutive months prior to expiration of the contract.
- During an extension the family continues to have FSS amount credited to the escrow account.
- Once the FSS Coordinator receive the request in writing it will be reviewed and determined if the request falls within the above guideline. A determination will be given back to the client in writing and document in the system and file. The FSS coordinator has the right to ask for supporting documentation.

- At the completion of the FSS contract, if the family has an outstanding debt with PPHA, they will be notified in writing that the escrow balance will be lowered by the amount of the balance of the debt.

PART XII: NETWORKING IN THE COMMUNITY

- An FSS program goal is to serve as a connector for families to available community services rather than to serve in the role of traditional case manager. For this reason, it is important to develop a support network of those agencies that have the common purpose of providing supportive services to enable families to achieve self-sufficiency.

18-XII.A. ACTIVITIES

- In furtherance of both FSS recruiting and networking efforts, FSS will participate in a variety of community activities that promote the concept of FSS.

PART XIII: PROGRAM COORDINATING COMMITTEE (PCC)

18-XIII.A. AGENCY PARTNERSHIPS

- The PPHA partners with the Cuyahoga Metropolitan Housing Authority's Program Coordinating Committee. Our participation in this group is beneficial to both our families and to FSS staff. We are able to build relationships with local agencies and job providers. This connection allows us to more effectively refer FSS participants to supportive services and job opportunities that help families to achieve their self-sufficiency goals. We regularly send a representative from FSS to attend these meetings.

18-XIII.B. COORDINATION OF SERVICES

- Services and activities under the FSS Program will be coordinated with relevant community services (including training, education and childcare) in order to avoid duplication of services and activities.

PART XIV: DATA TO BE MAINTAINED

- Significant contacts (including letters, policies, guidelines, and documents) will be maintained in accordance with PPHA's Record Retention Policy. These documents include the following:
 - The FSS Note Screen and/or FSS file.
 - Number of families who enter and/or leave FSS. Contracts of Participation.
 - Individual Training and Services Plan (goals). FSS Statement of Family Obligations.
 - 50058 FSS addendum information.
 - Escrow account information.

PART XV: FINAL GOAL FOR EACH FAMILY WHO JOINS FSS

18-XV.A. EMPLOYMENT

- The head of each FSS family will seek and maintain suitable employment and become and remain independent of TANF assistance for 12 consecutive months prior to the end of the FSS Contract.
 - Definition of "seeking and maintaining employment" - Head of FSS family must apply for employment, attend job interviews and otherwise follow through on employment opportunities.
 - Definition of "suitable employment" - A determination of suitable employment shall be made by PPHA based on the skills, education, and job training of the individual that has been designated the head of the FSS family, and based on the available job opportunities within the Cuyahoga County metropolitan area.
 - Verification of welfare free status (as currently defined by HUD) must be provided prior to final withdrawal of escrow account funds.
 - A statement from the most recent HCV landlord to confirm family's good standing, as well as review of whether any debt is posted by the HCV program.
 - The participant must be working consecutive three months prior to graduation from the program in order to qualify for his or her escrow.

18-XV.B. EARLY CONTRACT COMPLETION

- The purpose of this document is to provide guidance on Early Contract Completion of the Family Self – Sufficiency Program and Requesting Escrow Balance Funds. This guide ensures that the Early Completion of the Family Self – Sufficiency Contract of Participation terms and conditions are in accordance with the US Department of Housing and Urban Development's compliance, regulations, requirements, and does not release the PHA or family from the original responsibilities of the Family Self – Sufficiency (FSS) Program Contract of Participation. It allows the participants to complete their goals and responsibilities early and benefit from self – sufficiency. In addition, allows for other Housing Choice Voucher Participants the opportunity to benefit from the FSS program.
- All family members must:
 1. Comply with the terms of the lease
 2. Become independent of welfare assistance and remain independent of welfare assistance for at least 12 consecutive months before the contract expires

3. Be employed for at least 12 consecutive months prior to request of “Early Contract of Participation” and working 32 - 36 hours weekly. (Full time)
4. Complete an early completion assessment questionnaire/Exit Survey Process to determine whether or not self – sufficiency has been met and the individual has the tools to remain self – sufficient
5. If participation in the HCV program, the family must comply with the family obligation under the HCV program (Housing Choice Voucher Program “Things You Should Know”) and live in the jurisdiction of the HA that enrolled the family in the FSS program at least 12 months from the effective date of this contract, unless the initial PHA has approved the family’s request to move outside its jurisdiction under portability.
6. If any member of the family does not meet his or her responsibilities under this contract, the family will not receive the money in its FSS escrow account, at this time. [NOTE: They can continue on the Family Self – Sufficiency Program for the duration of the Contract of Participation in pursuing their goals.]
7. The family (Head of Household) can request up to 50% of their escrow based on pursuing their goals in achieving self – sufficiency such as... car repair or startup cost for participant owned company or business.

18-XV.C. COMPLETION OF THE CONTRACT OF PARTICIPATION

Completion of the contract occurs when the HA determines that:

1. The family has fulfilled all of its responsibilities under the contract; or
2. 30 percent of the family’s monthly adjusted income equals or is greater than the Fair Market Rent amount for the unit size for which the family qualifies.

PART XVI: TIMETABLE FOR PROGRAM IMPLEMENTATION

- HUD guidelines for enrollment will serve as program goals for FSS enrollment. Per HUD's amendment effective October 21, 1998, the number of families shall be decreased by one family for each family that after that date fulfills its obligation under the FSS Contract of Participation. For purposes of the FSS SEMAP indicator, this would reduce the mandatory size of the FSS program by the number of families that have successfully completed the FSS Contract. To support HUD’s goals of increasing homeownership activities and helping HUD- assisted renters to make progress toward self-sufficiency, PPHA may request permission to expand the total number of FSS slots over and above HUD’s initial guidelines for enrollment in FSS.

PART XVII: AFFIRMATIVELY FURTHERING FAIR HOUSING

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. PPHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Housing Choice Voucher Programs on the the basis of race, color, sex, religion, creed, national or ethnic origin, age, to actual or perceived sexual orientation, gender identity, familial or marital status, handicap or disability.

To further its commitment to full compliance with applicable Civil Rights laws, PPHA will provide Federal/State/local information to Voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Voucher holder's briefing packet and available upon request at the HCV reception desk.

All Housing Authority staff is kept informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families.

Affirmatively furthering fair housing includes providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Fair Housing posters are posted throughout the Housing Authority offices, including in the lobby and interview rooms and the equal opportunity logo is used on all outreach materials. Staff will attend local fair housing update training sponsored by HUD and other local organizations to keep current with new developments.

Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because PPHA's facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout PPHA's office in such a manner as to be easily readable from a wheelchair.

The PPHA offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided by Cincinnati Bell by dialing 1-800-545-1833.

PPHA will take the following steps to ensure that the FSS program "Affirmatively Furthers Fair Housing:"

- Advertise widely in the community for the coordinator position or positions by publicizing and disseminating information to make known the availability of the FSS Coordinator position. PPHA will advertise in a newspaper of general circulation, minority media, and by other suitable means.

- Market the program to all eligible persons, including persons with disabilities and persons with limited English proficiency by:
 - Providing all annual recertification HCV participants with information about the HCV FSS program (description of the program and FSS Coordinator contact information).
 - For persons with limited English proficiency (LEP) the following will be considered:

Oral Translation

The Housing Authority, with sufficient advanced notice, will make arrangements to assist non-English speaking families and translate documents into other languages.

Translation of Documents

In determining whether it is feasible to provide translation of documents written in English into other languages, PPHA will consider the following factors:

The number of applicants and participants in the jurisdiction who do not speak English and speak the other language.

The estimated cost to PPHA per client of translation of English written documents into the other language.

The availability of local organizations to provide translation services to non-English speaking families.

The availability of bilingual staff to provide translation for non-English speaking families.

Make buildings and communications that facilitate applications and service delivery accessible to persons with disabilities:

- Except as otherwise provided in 24 CFR 8.21(c)(1), 8.24(a), 8.25, and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because PPHA's facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout PPHA's office in such a manner as to be easily readable from a wheelchair.
- Provide fair housing counseling services or referrals to fair housing agencies to families needing this service.

To further its commitment to full compliance with applicable Civil Rights laws, PPHA will provide Federal/State/local information to Voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session, during annual recertification on FSS information forms, on all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Voucher holder's briefing packet and available upon request at the HCV reception desk.

If the program has a goal of homeownership or housing mobility, recruiting landlords and service providers in areas that expand housing choice to program participants. Record keeping covers, but is not limited to, the race, ethnicity, familial status, and disability status of program participants by:

Listed below are normal outreach activities used to facilitate an understanding of PPHA's Housing Choice Voucher program by other entities in Cuyahoga County:

- PPHA makes a concerted effort to keep private owners informed of legislative changes in the tenant-based program, which are designed to make the program more attractive to owners. This includes informing participant owners of applicable legislative changes in program requirements.
- PPHA encourages owners of decent, safe and sanitary housing units to lease to Housing Choice Voucher Program families.
- PPHA encourages participation by owners of suitable units located outside areas of high poverty or minority concentration.
- PPHA conducts general meetings with participating owners to improve owner relations, increase program knowledge and recruit new owners.
- PPHA maintains a list of interested owners and lists of units available for the Housing Choice Voucher Program and updates this list at least monthly. When listing requests from owners are received, they will be compiled by PPHA staff by bedroom size. PPHA reserves the right to pre-screen the property before listing it.
- PPHA maintains lists of available housing submitted by owners in all neighborhoods within the Housing Authority's jurisdiction to ensure greater mobility and housing choice to very low-income households. The lists of owners/units will be provided in the lobby, mailed on request, maintained on the agency's Internet site and provided at briefings. PPHA is not responsible for the accuracy of the information on the available unit listing.
- The staff of PPHA initiates personal contact with private property owners and managers by conducting formal and informal discussions and meetings.

- Printed material is offered to acquaint owners and managers with the opportunities available under the program.
- PPHA actively participates in a community-based organization(s) comprised of private property and apartment owners and managers.
- PPHA actively recruits property owners with property located outside areas of minority and poverty concentration and apply for exception payment standards if PPHA determines it is necessary to make the program more accessible in PPHA's jurisdiction.
- PPHA encourages program participation by owners of units located outside areas of poverty or minority concentration. PPHA periodically evaluates the demographic distribution of assisted families to identify areas within the jurisdiction where owner outreach should be targeted. The purpose of these activities is to provide more choice and better housing opportunities to families.
- Voucher holders are informed of a broad range of areas where they may lease units inside PPHA's jurisdiction and are given a list of owners or other parties who are willing to lease units or help families who desire to live outside areas of poverty or minority concentration.
- PPHA may work with an outside entity to counsel families on their prospective move and services available in the areas in which the family is interested, with the goal of increasing the number of voucher holders moving into low- poverty neighborhoods.
- PPHA shall periodically:
 - Request the HUD Field Office to furnish a list of HUD-held properties available for rent.
 - Develop working relationships with owners' associations.
 - Establish contact with civic, charitable and neighborhood organizations which have an interest in housing for low-income families and public agencies concerned with obtaining housing for displacements.
 - Explain the program, including equal opportunity requirements and nondiscrimination requirements, including Fair Housing Amendments Act of 1988 and Americans with Disabilities Act, to real estate agents, owners, and other groups that have dealings with low-income families or are interested in housing such

families.

PART XVIII: RECORDS FOR MONITORING PPHA PERFORMANCE

In order to demonstrate compliance with HUD and other pertinent regulations, PPHA will maintain records, reports and other documentation in accordance with HUD requirements and in a manner that will allow an auditor, housing professional or other interested party to follow, monitor and/or assess PPHA's operational procedures objectively and with accuracy and in accordance with SEMAP requirements with internal supervisory audits.