For Housing Authority Meeting of: August 22, 2022

CITY OF SANTA ROSA HOUSING AUTHORITY

TO: HOUSING AUTHORITY COMMISSIONERS FROM: JULIE GAREN, PROGRAM SPECIALIST

HOUSING AND COMMUNITY SERVICES

SUBJECT: HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE

PLAN REVISION – ELIMINATING CHAPTER 18 FAMILY SELF SUFFICIENCY (FSS) PROGRAM ACTION PLAN AND ADOPTING

A SEPARATE INDEPENDENT FSS ACTION PLAN

AGENDA ACTION: RESOLUTION

RECOMMENDATION

It is recommended by the Housing and Community Services Department that the Housing Authority, by resolution, adopt the revisions to the Housing Choice Voucher Program Administrative Plan eliminating Chapter 18 – Family Self Sufficiency (FSS) Program Action Plan and adopting the separate independent FSS Action Plan that incorporates the substantive changes issued by HUD in the FSS Final Rule dated May 16, 2022 and in Title 24 of the Code of Federal Regulations Part 984.

EXECUTIVE SUMMARY

The Administrative Plan is the major policy document guiding the ongoing administration of the federally regulated Housing Choice Voucher (HCV) program. Where allowed under law, the U.S. Department of Housing and Urban Development (HUD) permits local jurisdictions to establish policies pertaining to the program. Chapter 18 of the current Santa Rosa Housing Authority Administrative Plan incorporates the Family Self Sufficiency (FSS) Program Action Plan that outlines the policies and procedures for the administration of the FSS Program. FSS is a voluntary program offered to Housing Choice Voucher program participants that enables voucher households to increase their earned income and reduce their dependency on welfare assistance and rental subsidies through resource referrals, case management and asset building opportunities. On May 16, 2022, HUD published the FSS Final Rule and new regulations outlining FSS program administration and mandated that all FSS programs submit an updated FSS Action Plan to HUD by September 30, 2022. The City of Santa Rosa Housing Authority will satisfy this requirement by eliminating Chapter 18 of the current Administrative Plan and adopting a separate independent FSS Action

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Plan dated August 22, 2022 which incorporates the policy changes under the FSS Final Rule dated May 16, 2022 and in Title 24 of the Code of Federal Regulations Part 984.

BACKGROUND

The Department of Housing and Community Services (HCS) administers the FSS program for the City of Santa Rosa Housing Authority (Housing Authority). The FSS program, is a voluntary program offered to Housing Choice Voucher program participants that enables voucher households to increase their earned income and reduce their dependency on welfare assistance and rental subsidies through resource referrals, case management and asset building opportunities.

The FSS program is the nation's largest asset-building program for low-income families. The program currently serves around 65,000 participants at over 700 Public Housing Authorities (PHAs) across the Country. FSS is a voluntary program that uses a combination of service coordination and an escrow savings account to help participants grow their earned income and savings and increase their financial well-being overall. In 2021, upon graduation from the program, the average family participating in FSS nationwide had about \$9500. The City of Santa Rosa FSS Program currently has 43 participants.

To participate in FSS, Housing Choice Voucher holders enter into a five-year Contract of Participation and create an Individual Training and Services Plan (ITSP) outlining their employment and related goals. Families work with a Housing Authority representative to secure referrals for resources to achieve their specific goals. Entering a Contract of Participation also allows the Housing Authority to establish an interest-bearing escrow account on behalf of the family, and during the contract years any increases in the family's rent as a result of increased earned income result in a credit to the family's escrow account. When a family graduates from the program by achieving the goals outlined in their ITSP, they may access the escrow and use it for any purpose.

A component of the FSS program requirements is the Program Coordinating Committee, comprised of local organizations that assist the Housing Authority in securing services to support families in the FSS program, such as educational institutions, financial empowerment organizations, other government assistance programs, and participants in the FSS program. The City of Santa Rosa Housing Authority and the Sonoma County Housing Authority share a joint Program Coordinating Committee including participant representatives from both FSS programs. On May 16, 2022, HUD published the FSS Final Rule and new regulations outlining program administration guidelines and mandated that all FSS programs submit an updated FSS Program Action Plan to HUD by September 30, 2022.

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The Administrative Plan is the major policy document guiding the ongoing administration of the federally regulated Housing Choice Voucher (HCV) program. Chapter 18 – Family Self Sufficiency (FSS) Action Plan of the current Santa Rosa Housing Authority Administrative Plan incorporates the policies and procedures for administration of the FSS Program.

To satisfy HUD requirements, Chapter 18 of the current Administrative Plan is being eliminated and replaced by a separate independent FSS Action Plan that incorporates the substantive changes issued by HUD in the FSS Final Rule dated May 16, 2022 and in Title 24 of the Code of Federal Regulations Part 984.

PRIOR HOUSING AUTHORITY REVIEW

Not applicable.

<u>ANALYSIS</u>

The current FSS program policies in the FSS Action Plan require replacement per the FSS Final Rule and New CFR 984 published by HUD on May 16, 2022. The required changes to the FSS Program Action Plan are substantial and the current plan will be eliminated from the Housing Choice Voucher Program Administrative Plan and a separate independent FSS Action Plan will be adopted as the guiding policy document for the administration of the Family Self Sufficiency Program.

New HUD program guidelines outline changes to the FSS Program including but not limited to the following:

- Program Coordinating Committee requirements
- Family selection criteria procedures
- Enrollment and eligibility
- Contract of Participation
- Definition of suitable employment
- Services to be coordinated
- Escrow account calculations
- Income reporting guidance
- Accounting for Escrow
- Escrow Disbursement
- Extensions
- Graduations
- Portability
- · Reporting and Monitoring

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The new FSS rule permits any adult household member, not only the voucher Head of Household, to enroll in the program and eliminates regulations that were potential barriers to program graduation.

The separate and independent Family Self Sufficiency (FSS) Action Plan dated August 22, 2022 incorporates the FSS program policies in the FSS Final Rule published May 16, 2022 and changes to Title 24 of the Code of Federal Regulations Part 984.

The proposed FSS Action Plan dated August 22, 2022 is provided as Attachment 1-Family Self Sufficiency (FSS) Action Plan.

FISCAL IMPACT

The proposed changes to the FSS Action Plan do not have a fiscal impact.

ENVIRONMENTAL IMPACT

The Housing Authority finds that the proposed action to update the policies in the Administrative Plan is exempt from the provisions of the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15061(b)(3) and 15378 in that there is no possibility that the implementation of this action may have significant effects on the environment, and no further environmental review is required.

BOARD/COMMISSION/COMMITTEE REVIEW AND RECOMMENDATIONS

Not applicable.

NOTIFICATION

Not applicable.

ATTACHMENTS

- Attachment 1 Family Self Sufficiency Action Plan
- Resolution

CONTACT

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