



# **CHICAGO HOUSING AUTHORITY FAMILY SELF-SUFFICIENCY ACTION PLAN**

CHICAGO HOUSING AUTHORITY DEPARTMENT OF RESIDENT SERVICES

CHICAGO HOUSING AUTHORITY | 60 E. Van Buren Chicago, IL 60605

**CHICAGO HOUSING AUTHORITY (CHA)  
FAMILY SELF-SUFFICIENCY (FSS) ACTION PLAN**

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## THE FAMILY SELF-SUFFICIENCY ACTION PLAN

The Chicago Housing Authority's (CHA) Family Self-Sufficiency (FSS) Action Plan establishes policies for carrying out the FSS program in a manner consistent with Department of Housing and Urban Development (HUD) requirements and local goals and objectives contained in CHA's Moving to Work Plan (MTW Plan), Admissions and Continued Occupancy Policy (ACOP) and Housing Choice Voucher (HCV) Administrative Plan. CHA periodically reviews and updates the Action Plan to reflect changes in regulations, operations, program size, etc. CHA will submit any changes to the Action Plan to HUD for approval. This FSS Action Plan is available for public review as required by 24 CFR Part 903.

## CHA DEMOGRAPHICS

As reported in the CHA Quarterly Report 4<sup>th</sup> quarter 2021 the following charts detail general demographic information for CHA households.

	Public Housing			HCV	Both
	All Family-Designated	Senior-Designated	Total Public Housing		
OVERALL DEMOGRAPHICS					
Total Households	9,270	8,626	17,896	45,552	63,448
Total Residents	22,951	9,598	32,549	99,724	132,273
HOUSEHOLD SIZE					
Average Household Size	2.5	1.1	1.8	2.2	2.1
HEAD OF HOUSEHOLD GENDER					
Female	8,124	4,108	12,232	36,288	48,520
Male	1,146	4,518	5,664	9,264	14,928
RESIDENT AGE					
Youth (0-17)	9,366	93	9,459	34,180	43,639
Working-Age (18-54)	9,833	204	10,037	44,900	54,937
Near-Elderly (55-61)	1,475	299	1,774	7,363	9,137
Elderly (62+)	2,277	9,002	11,279	13,281	24,560
HEAD OF HOUSEHOLD RACE/ETHNICITY					
African American, non-Hispanic	8,191	5,093	13,284	39,610	52,894
Hispanic, any race	18	1,177	1,195	207	87
White, non-Hispanic	910	942	1,852	3,969	5,821
Asian, non-Hispanic	25	85	110	141	1,566
Other/Unknown race	126	1,329	1,455	1,625	3,080
DISABILITY STATUS					
Household with a disabled member	3,199	3,911	7,110	18,670	25,780
% of households with a disabled member	35%	45%	40%	41%	41%
HOUSEHOLD INCOME					
% at 0-30% AMI (Extremely Low Income)	78%	92%	85%	85%	85%
% at 31-50% AMI (Very Low Income)	14%	7%	11%	12%	12%
% at 51-80% AMI (Low Income)	6%	1%	4%	3%	3%
% at 81%+ AMI (Moderate Income)	2%	0%	1%	0%	0%

## **FSS PARTICIPATION AND PROGRAM IMPLEMENTATION**

CHA maintains a voluntary FSS program that is available to up to 1,250 households receiving a subsidy through CHA's HCV, Project Based Voucher (PBV), Rental Assistance Demonstration (RAD1/RAD2), or PH programs. CHA does not limit the number of participants receiving a specific subsidy type; previously CHA limited participation of HCV households to 900 and PH households to 350. As of August 2022, there are 997 active participants in CHA's FSS program. The HCV FSS program began in 1996 with a target enrollment of 900 participants and the PH FSS program began in 2006 with a target enrollment of 50 participants. CHA operated the HCV and PH FSS programs separately until January 2011, when the two programs merged under CHA's Resident Services Division.

CHA provides direct oversight and administration of the FSS program. Previously, CHA has contracted with an FSS service provider that was responsible for program coordination, case management and coaching, financial education, employment, and supportive services. Effective January 2023, CHA will no longer use a contracted FSS service provider, and will directly administer FSS services.

## **FSS ELIGIBILITY, SELECTION AND ENROLLMENT**

CHA households in compliance with the voucher program or Public Housing (PH) lease are eligible for FSS participation. All FSS families must designate an adult aged eighteen or older as the head of FSS family, who does not have to be the Head of Household (HOH), to sign the FSS Contract of Participation (COP) and set goals on the Individual Training and Services Plan (ITSP). FSS participation is voluntary, and FSS families exiting the program due to graduation or unsuccessful exit will retain the right to occupancy according to their lease, and the Admissions and Continued Occupancy Policy (ACOP) or HCV Administrative Plan.

### **Household Eligibility**

FSS participation had been limited to the Head of Household (HOH). Pursuant to the FY2019 MTW Plan, CHA allowed adult household members other than the HOH to enroll in the FSS program. Per 24 CFR 984.303, any adult household member aged eighteen or older may participate in the FSS program and have an ITSP. Individual records for each participant will be maintained in the FSS Case Management Tracking System (CMTS, currently TAAG).

CHA may choose to limit the number of adult household members participating in FSS if HOH participation is less than 50% of total participation.

At any time during the term of the FSS contract, any adult household member may be enrolled in FSS and earn pay points to be applied to the FSS family's FSS savings account. The FSS family must designate a head of FSS family, to sign the COP to enroll the family in the FSS program and there will be one COP for the entire family. If the family decides to designate a new head of FSS family, as agreed upon by CHA, or the head of FSS family moves out of the household, the family must designate a new head of FSS family to sign a new COP as an addendum to the original COP. Anytime the family designates a new head of FSS family, a new COP must be signed by the new head of FSS family as an addendum to all other previously signed COPs. The head of FSS family must attend an Information Session with all other interested participants to sign the COP, designate the head of FSS family, and enroll the family in the FSS program. All participating members being part of the Information Session and COP review will help to ensure that all household members are aware of the requirements for successful completion of the FSS program and will be able to directly communicate to CHA staff their designation of who the head of FSS family will be.

This will help ensure that all participating family members understand the program requirements and that the payout upon successful completion of the program by the entire family will go to the head of FSS family.

All participating family members are not eligible for some FSS savings pay points. This is described in greater detail in this Action Plan section pertaining to FSS Savings Account Maintenance and Credit, but all participating FSS family members will otherwise be engaged and held to the same program requirements as the head of FSS family.

### **Outreach and Marketing**

Opportunities are provided for enrollment into the FSS program when current program participation is below the target enrollment. CHA households are informed of availability in the FSS program through the following outreach methods:

- CHA's primary website and/or social media sites;
- HCV satellite, private property management, and social service, education, and workforce provider offices;
- information provided to resident representation (e.g. Local Advisory Council, HCV Participant Council);
- HCV newsletter and/or other resident publications;
- CHA Call Center; and
- other outreach efforts as needed.

### *Marketing to Family Unification Program-Youth (FUPY) and Foster Youth to Independence (FYI) Households*

CHA will conduct regular outreach to FUPY/FYI households to provide information on the FSS program, including but not limited to: the enrollment process; a description of available services; requirements for participation and graduation; and contact information for the program. FUPY/FYI families may also receive information on the FSS program and other programs, and resources offered to CHA households at their admissions/initial voucher briefing.

### **Permissible Motivation Selection Factors**

FSS applicants may be screened for interest and motivation by using permissible motivation selection factors per HUD regulations, including requiring attendance at FSS information sessions. Reasonable accommodations will be made for individuals with mobility, manual, sensory, speech impairments, mental, or developmental disabilities. In addition, if the applicant needs either childcare or transportation to be able to attend, the FSS service provider shall assist the applicant in obtaining these support services.

### **Prohibited Selection Factors**

CHA's selection procedures ensure that individuals are selected for participation without regard to race, color, sex, gender identify or expression, sexual orientation, disability, familial status, or national origin. CHA will not select participants based on prohibited motivation selection factors, including educational level, educational or standardized test results, previous job history or job performance, credit rating, marital status, number of children, or other factors, such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or nonminority groups.

### **Enrollment of Previous Participants**

There are instances in which FSS family's need to exit the program due to unanticipated circumstances or hardships that are beyond control of the family and/or may inhibit progress toward ITSP goals. Previous FSS families who exit from the program voluntarily or unsuccessfully (i.e. due to non-completion of ITSP goals), may be approved for re-enrollment into the FSS program after 12 months of being exited from the program. Re-enrollment is limited to one-time per FSS family. Any subsequent requests for re-enrollment will need prior approval from CHA and will be reviewed on a case-by-case basis.

Previous FSS families are not eligible to re-enroll in FSS if:

- the FSS family successfully completes the FSS Program; or
- the FSS family is terminated for non-compliance pertaining to the public housing lease and/or HCV Program, or commits any fraud, bribery, or any other corrupt or criminal act in connection with any CHA housing programs.

### **FSS Waitlist Procedures**

FSS enrollment is continuous if there are slots available in the program. CHA shall initiate and maintain an FSS waitlist when the program is at capacity. When program slots are not available, referred families will be placed on the FSS waitlist in the order in which the referral or inquiry is received (i.e. date of receipt). Families on the waitlist will be contacted in the order in which they were added to enroll in the program and will have 30 calendar days from the initial outreach attempt to accept or decline the offered slot. Families will be removed from the waitlist if they enroll in the program, decline the slot, or are non-responsive to multiple outreach attempts. CHA will not maintain an exact limit on the number of slots available on the FSS waitlist, however CHA may temporarily close the FSS waitlist if it becomes so large that those waiting significantly outnumbers anticipated available slots.

### **Selection Preference – FUP-FSS Demonstration**

In July 2016, CHA was approved for implementation of a Family Unification Program (FUP) and FSS Demonstration (FUP-FSS Demonstration) sponsored by HUD to test the effectiveness of combining housing vouchers for eligible youth lacking adequate housing under FUP with assistance from the FSS program. FUP youth participants in the FUP-FSS Demonstration can extend the length of their FUP housing voucher (time-limited to 36 months) through the full term of their FSS participation. In accordance with the Fostering Stable Housing Opportunities (FSHO) amendment, any FUPY/FYI youth leasing up after December 27, 2020 can extend their voucher up to 24 months, not to exceed a maximum time of 60 months, if they enroll in FSS. To be eligible for the FUP-FSS Demonstration, the FUP participant must be certified at the time of application by the local public child welfare agency (PCWA) to be at least 18 years old and not more than 24 years old, who left foster care at age 16 or older or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act, and who does not have adequate housing. CHA will determine eligibility for voucher assistance. FUPY/FYI participants will be held to all other FSS program requirements and policies as described in this Action Plan.

To ensure prioritization of enrollment for FUPY/FYI youth, CHA will utilize a selection preference for FUPY/FYI youth applicants who elect to participate in the demonstration. If the program is at maximum capacity (1,250 participants), FUPY/FYI youth applicants will be moved to the top of the FSS waitlist in the order in which the referral or inquiry is received. FUPY/FYI youth enrolled in FSS through this selection preference will not exceed 50% of the total number of FSS slots occupied by HCV participants.

Once FUPY/FYI youth have utilized the housing voucher to lease a unit, CHA staff and/or the FSS service provider will conduct outreach to the household to provide information on the FSS program and either FUP-FSS Demonstration or FSHO (whichever applicable), including:

- the enrollment process;
- a description of available services to be provided during participation;
- the term of the program;
- requirements for participation and graduation; and
- contact information for FSS staff should they have any follow questions about the program.

FUPY/FYI youth may also receive information on the FSS program and other programs, and resources offered to CHA households at their admissions/initial voucher briefing.

FSS service provider or CHA staff will periodically (i.e. quarterly or bi-annually) follow up with FUPY/FYI households who have not enrolled into FSS to provide additional marketing materials about the program, including FSS success stories, and to address any questions about the program. Additional FSS workshops or information sessions specifically targeted to FUPY/FYI youth may also be scheduled to inform participants of the demonstration program and services available.

## **SUMMARY OF FSS ACTIVITIES AND SUPPORTIVE SERVICES**

CHA's FSS program enables participants to build financial assets while working toward educational, professional, and personal goals such as:

- reducing debt/improving credit;
- earning a post-secondary degree or GED;
- enhancing job-related skills;
- starting a new career/job;
- starting a business;
- becoming a homeowner.

FSS participation generally lasts five years. During this time, FSS Coaches work directly with FSS families to set and monitor their personal goals, as well as provide coaching to support FSS families as they work to achieve these goals. In addition to coaching and direct services, FSS families benefit from the FSS savings account that enables them to build financial assets. When FSS families meet goals and graduate from the program, they are eligible to receive a payout of the monies accrued throughout the duration of participation.

### **Identifying Support Needs**

Upon enrollment, the FSS Coach will meet with the FSS family to conduct an FSS needs assessment. The needs assessment will inform the development of the Individual Training and Services Plan (ITSP) and determine supportive services needed and/or barriers to overcome for the FSS family to achieve the goals outlined in their ITSPs to successfully complete the program. FSS Coaches may also utilize various financial assessments to assist participants to develop individual financial goals and determine what types of financial education and coaching are needed. Ongoing needs and financial assessments may be administered by the FSS Coach through regular participant outreach and engagement activities to inform any changes that need to be made to the ITSP.



## **FSS Activities and Support Services**

FSS Coaches delivers both direct service coordination and referrals to local public and private resources.

### *Education/Training*

- FSS Coaches make referrals to adult literacy and GED preparation courses if participants did not complete their high school diploma or GED, and/or need additional literacy courses prior to entering or advancing in the workforce.
- Participants who have completed their high school diploma or GED are encouraged to enroll in college or other post-secondary education and job training opportunities, including through CHA's Partners in Education program with the City Colleges of Chicago.
- FSS Coaches encourage participants to attend digital literacy courses or training to advance their computer and/or other technological skills.

### *Employment Services*

- FSS Coaches assist participants with career planning, employment preparation soft-skills, placement, and retention support.
- FSS participants are referred to CHA's Workforce Opportunity Resource Center who in turn will provide assessment and connection to CHA's contracted workforce providers. These include but are not limited to entrepreneurial and business development classes, linkage to American Job Centers, direct placement providers and transitional employment.

### *Financial Strength/Asset Building*

- FSS Coaches provide one-on-one coaching or group financial education and inclusion opportunities on topics including household budgeting, credit repair and maintenance, tax preparation and filing, banking, savings, investments, and retirement planning.

### *Homeownership*

- FSS Coaches provide referrals to CHA's Choose to Own Homeownership program and/or other homebuyer program resources.

### *Support Services*

- FSS Coaches provide referrals for services including childcare, workplace clothing or uniforms, transportation, or housing stability assistance (i.e. utility and weatherization programs).
- FSS Coaches utilize coaching techniques and tools to assist participants in goal setting and working toward achievement of these personal goals.

## **Participant Engagement**

Regular outreach and engagement activities (e.g. home visits, office visits, telephone check-ins) are scheduled with participants to review and/or adjust the ITSP, document progress toward goals, and provided needed services or referrals; frequent engagement may be necessary depending on the needs of the participant and the progress made toward FSS goals. FSS Coaches attempt to engage each participant at least once each quarter of the calendar year.

Pursuant to the CHA FY2014 MTW Plan, FSS participants may be terminated due to non-engagement to open slots up to other households. For these purposes, engagement in the FSS program is defined as having at least one (1) face-to-face FSS progress meeting each calendar year ("annual face-to-face FSS progress meeting").

## **CONTRACT OF PARTICIPATION (COP)**

At enrollment, FSS families must designate a head of FSS family to enter into a COP with CHA. Although any household member aged eighteen or older may participate in FSS, there will be one COP per family. The purpose of the COP is to state the rights and responsibilities of the FSS family and CHA, the resources and supportive services to be provided to the family, and the activities to be completed by the participant (i.e. FSS goals listed in the ITSP). CHA utilizes a COP that varies from the standard HUD COP (*form HUD-52650*). CHA's COP is based on *form HUD-52650* but was modified to reflect FSS activities approved through its MTW Plans, including a modified FSS savings model.

### **Establishment of the COP**

The COP is effective the first day of the month after execution. The completion date of the COP is five years from the effective date of the first re-exam following contract execution, during which the FSS family will engage in activities to meet FSS goals and earn pay points credits. If the FSS family needs additional time to complete the FSS goals, they may be approved by CHA for a contract extension of no more than two years.

In accordance with the FSHO amendment, Family Unification Program-Youth (FUPY) and Fostering Youth to Independence (FYI) households admitted to the HCV program after December 27, 2020 are limited to 60 months of HCV program participation. The completion date of the COP will coincide with this timeline. No contract extensions will be granted upon expiration of the COP.

### **Individual Training and Services Plan (ITSP) Development**

In conjunction with the COP, each participating adult family member completes an ITSP that establishes the final and interim goals for participation in the program. These goals enable the FSS Coach and the participant to measure the participant's progress. The ITSP is a component of the COP and thus an obligation of the participant. Each participating family member must complete the goals established on each individual's ITSP, for the COP to be considered complete by CHA. The ITSP may be modified by the participant and the FSS Coach to reflect changes in personal interests and achievable goals. CHA requires that all participants set interim goals for employment and financial education activities as detailed below, however most interim goals will vary by participant depending on their individual needs. The FSS program is a voluntary program, and each participating family member may elect to terminate their ITSP and participation in the FSS program at any time. For the purposes of graduation, CHA will only evaluate the progress of all active participants and ITSPs.

#### *ITSP Required Goal – Free of Welfare Assistance*

To successfully complete the program all household members must be independent from welfare assistance at the time of graduation. FSS Coaches shall inform each participant of this requirement regardless of whether anyone in the household is receiving welfare assistance at the time of COP implementation and include this as a mandatory goal in the ITSP.

CHA requires a signed verification in a format approved by CHA from the head of FSS family and utilizes its system of record to determine if the FSS family meets this requirement.

#### *ITSP Required Goal - Employment Requirement*

Pursuant to CHA's FY2014 MTW Plan, CHA's FSS participants are required to maintain 12-months of continuous employment during the last 12-months of the COP to be considered for successful completion and graduation from the program.

CHA requires one or more of the following forms of verification to determine if the participant meets this requirement:

- CHA employment verification form
- employer offer letter (that includes hire date) and current paystub
- employer letter verifying current employment and hire date
- paystub that includes hire date
- W-2 or 1099 tax forms
- self-employment tax forms

Participants who experience a lapse in employment history due to unexpected termination may still be considered to meet the employment requirement on a case-by-case basis. However, new employment must be attained within 90-days of the initial termination date to maintain compliance with the employment requirement. Similarly, lapses in employment history due to seasonal employment (i.e. employed by the local school district or related service provider) may be considered, however the participant must document intent to return to work and/or exhibit a pattern of seasonal work that show that employment will be regained within 90-days of the initial termination, or separation from employment.

#### *ITSP Required Goal - Financial Education and Coaching Requirement*

CHA requires that FSS participants engage in financial education and coaching activities to successfully complete the FSS Program. Pursuant to CHA's FY2014 MTW Annual Plan, FSS participants are required to set personal financial goals and engage in financial education activities throughout participation to increase financial literacy and progress toward economic independence.

CHA requires a verification of completed financial education/inclusion and coaching activities, including, but not limited to:

- certificate of completion;
- sign-in sheet;
- coaching session verification form; or
- financial assessment or worksheet.

#### *ITSP Interim Goals*

Participants may also include other educational, professional, or personal goals in the ITSP, including:

- reducing debt/improving credit;
- educational advancement (e.g. GED or post-secondary);
- obtaining employment;
- career advancement;
- starting a business;
- homeownership.

Unlike the required goals, interim goals may be modified at any point during participation. Interim goals must also be accomplished to successfully complete the program. Completion of these goals will be verified in a manner similar to the required interim goals through the use of verification forms, etc.

### **COP Completion**

By regulation, the COP is considered complete, and participation in the FSS program is concluded, when the FSS participant/household has fulfilled the obligations of the COP (including completing all of the required and self-identified ITSP goals) on or before the expiration of the Contract term, including any extension thereof.

All successful FSS families must be compliant with the lease and/or obligations of the PH or HCV programs, and may not owe rent to the CHA or private landlord. Upon successful completion of the FSS program, FSS families are invited to a graduation ceremony hosted by CHA.

### ***Fulfillment of COP and ITSP***

CHA requires FSS families fulfilling all obligations under the COP to spend a minimum of three-years in the program to successfully complete FSS and receive the FSS savings funds accrued. FSS families requesting to graduate from the program within the first three-years of participation will be reviewed and approved on a case-by-case basis. FSS families who want to successfully complete the program in conjunction with a voluntarily transition off the housing subsidy must alert FSS program staff within 30-days of the end-of-participation in the CHA housing program.

### ***\$0 Housing Assistant Payment (HAP) Participants***

An FSS household's income may increase during participation to the point in which the household no longer receives a HAP through the HCV program ("HAP"). Participants in a \$0 HAP household, including HOH and non-HOH adult members, may be eligible for successful completion of the program despite not completing at least three-years of FSS participation or being employed for 12-months. Instead, the participant must have been in FSS for at least one-year and must be employed at completion but not for 12-months.

### **COP Extension**

FSS families may be granted COP extension(s) of up to two (2) years if additional time is needed to meet one or more ITSP goals (e.g. needing additional time to become free of welfare assistance, unable to meet employment requirement due to serious illness or involuntary loss of employment). The FSS family must request a COP extension in writing and include a description of the need for the extension and identification of the goal that needs to be met to complete the program. These requests will be evaluated by CHA and approved on a case-by-case basis.

### **COP Termination**

The COP is automatically terminated if:

- the household's housing subsidy assistance is terminated due to non-compliance; or if the head of FSS family leaves the household and/or unit without requesting to successfully complete the program prior to leaving.

The COP may be terminated before the expiration of the contract term due to the following:

- the FSS family and CHA agree to terminate the contract;
- CHA determines that the FSS family has not fulfilled its responsibilities under the COP, including not achieving or providing documentation to support achievement of the goals outlined in the ITSP;
- the FSS family voluntarily withdraws from the FSS program;
- an act occurs that is inconsistent with the purpose of the FSS program;
- the household ports-out to another PHA; or

- other actions permitted in accordance with HUD requirements.

If the COP is terminated or incomplete the FSS family will forfeit FSS savings earned during participation. Termination of the COP will not affect eligibility for housing subsidy; FSS households exiting the program due to unsuccessful exit will retain the right to occupancy according to their lease, and the ACOP or HCV Administrative Plan.

### **COP Termination with FSS Savings Disbursement**

The COP will be terminated with FSS savings disbursement when:

- the FSS family ports-out to another PHA and CHA determines that the family has not fulfilled its responsibilities under this contract, including not achieving or providing documentation to support achievement of the goals outlined in the ITSP, and successful completion of the contract prior to the move is not possible. CHA may disburse the funds in the participant's FSS savings account as long as the FSS family has been in the program for at least 12 months; or
- the head of FSS family becomes permanently disabled and unable to work during the term of the contract; or
- services that CHA and the FSS family have identified in the ITSP as integral to the participant's advancement towards self-sufficiency are unavailable, and cannot obtain these services from another agency; or
- other actions permitted in accordance with HUD requirements.

### **Modifications to the COP**

If an error is found on the COP (i.e. start date/end date) the modification is initialed by the staff making the adjustment, a case note is entered into the participant file, and the participant is notified of the change in writing and provided a new copy of the COP.

### **FUP-FSS Demonstration – Contract Completion and Termination**

Participants of the FUP-FSS Demonstration admitted to the HCV program on December 27, 2020 or prior, who can extend the length of their housing voucher through FSS participation, will no longer receive housing assistance upon completion of the COP, regardless of whether the COP is terminated due to non-compliance or successful completion of the program. If a participant in the FUP-FSS Demonstration is terminated from the FSS program prior to completion of the COP, the participant will no longer be considered a part of the FUP-FSS Demonstration. With the FSS termination, the participant is subject to the statutory time limit of 36 months, beginning from the time the first HAP contract is signed. If the participant has been assisted for more than 36 months, their housing assistance will be terminated. In accordance with CHA's HCV Administrative Plan, the participant will be eligible for an informal hearing to appeal the termination.

### **FSS SAVINGS ACCOUNT MAINTENANCE AND CREDIT**

One of the primary incentives of FSS program participation is the opportunity to build financial assets through the FSS savings account. When FSS families meet goals and graduate from the program, they are eligible to receive a payout of the monies accrued throughout the duration of participation. CHA maintains FSS savings funds in an interest-bearing depository account.

CHA provides an annual report to the participant on the FSS savings account including, but not limited to:

- balance at the beginning of the reporting period;

- amount credited during the period;
- any deductions made from the account; and
- total in the account at the end of the reporting period.

### Modified FSS Savings Model

Pursuant to CHA's FY2018 MTW Annual Plan, CHA adopted a modified FSS savings model in which FSS participants accrue funds by achieving specific pay points – activities and goals that align with both participant goals and FSS objectives. The pay point savings model will enable participants to earn FSS savings credits based on the attainment of various goals of the program including: employment, education, financial stability, homeownership, or transition out of subsidized housing. As participants achieve their goals, a structured incentive payment is placed into an FSS savings account.

Following is a chart detailing CHA's FSS pay points and associated amounts open to each participating FSS family members with the exception of the transition off of the housing subsidy pay point, which is only available one-time to the entire FSS family for transitioning off of the housing subsidy.

Category	Pay Points	Eligibility	Amount
Education/ Training	Completion of training/certification program	one-time	\$500
	Completion of GED	one-time	\$500
	Completion of Associates degree	one-time	\$750
	Completion of Bachelor's degree	one-time	\$1,000
	Completion of Master's or Doctorate degree	one-time	\$1,250
Employment	Obtain new employment <sup>1</sup>	one-time	\$500
	Employment retention for 12-months	one-time per year	\$1,000
	Starting a resident owned (section 3) business <sup>2</sup>	one-time	\$1,000
Engagement	Completion of annual face-to-face FSS progress meeting	one-time per year	\$250
	Successful completion of the FSS program	one-time	\$1,000
Financial Stability/Asset Building	Engagement in Financial Education and Coaching Activities	one-time per year	\$250
	Improvement of credit score	one-time	varies <sup>3</sup>
	Open and maintain a new checking or savings account <sup>4</sup>	one-time	\$300
	Increase personal savings by at least \$200	one-time	varies <sup>5</sup>

<sup>1</sup> May include new employment at a company or organization, or self-employment defined by receipt of a 1099.

<sup>2</sup> Must be a certified Section 3 business with a current registration in CHA's WORC (Section 3) portal.

<sup>3</sup> Pay point amount is double the amount of the number of points the credit score increases in 50-point intervals.  
50-point increase = \$100, 100-point increase = \$200, 150-point increase = \$300.

<sup>4</sup> Account must be opened at least 12-months prior to completion of the program.

<sup>5</sup> Pay point amount will match up to \$1,000 of personal savings accrued over the term of participation.

Housing/ Homeownership	Engagement in homeownership preparation activities <sup>6</sup>	one-time per family member	\$500
	Purchase of a home	one-time	\$2,500
	Transition off of the housing subsidy <sup>7</sup>	one-time	\$2,500

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<sup>6</sup> Includes completion of pre-purchase counseling and mortgage qualification or lender pre-approval. . The FSS family is eligible for this only if they have not purchased a home and are not eligible for the purchase a home pay point. . Any participating FSS family member may engage in homeownership preparation activities to earn this pay point to be credited to the family's FSS savings account one-time during the term of the COP.

<sup>7</sup> Open to FSS families who become ineligible for CHA housing subsidy due to increased income (i.e. \$0 HAP) or who voluntarily terminate the housing subsidy due to moving into the private market or homeownership. . Only graduates will be eligible for the pay point, but a previous graduate can request this pay point w/in 120 days after graduation if the transition off of housing subsidy is not aligned with graduation.

### **Savings Accrual and Verification**

FSS families work with FSS Coaches to document achievement of the pay points. According to a schedule approved by CHA, the FSS service provider will submit a request form in a CHA approved format for specific FSS savings credit(s) to be applied, and verifications maintained in the participant file in the FSS CMTS.

CHA will apply credits at least quarterly for the following pay points:

- Completion of training/certification program;
- Completion of GED;
- Completion of Associate's, Bachelor's or Master's Degree;
- Obtaining new employment;
- Employment retention for consecutive 12-months;
- Completion of required annual face-to-face meeting;
- Engagement in Financial Education & Coaching; and
- Purchase of a home.

CHA will apply credits upon successful completion of the program for the following pay points:

- Successful completion of the FSS program;
- Improvement of credit score;
- Open and maintain a new checking or savings account;
- Increase personal savings by at least \$200;
- Engagement in homeownership preparation activities; and
- Transition off of the housing subsidy.

Pay points may be applied retroactively at any point during participation in the program, apart from those pay points that are only applied upon successful completion of the program. For example, if a participant earns an Associate's Degree in May, but does not have an annual face-to-face FSS progress meeting and provide documentation of completion of the goal to the FSS Coach until the following December, the pay point can still be applied to the account.

### **Traditional FSS Savings Model**

When CHA moved to the modified FSS savings model, some participants requested to remain on the traditional savings model because they were currently accruing a significant amount of monthly credits under the traditional model. CHA approved 20 participants to remain on the traditional model through the end of their COP term and will calculate their FSS savings based on increases in the household's total tenant payment resulting from increases in earned income. As of July 2022, 2 Participants remain on the traditional savings model and will still need to provide verification of activities and goal completion for the purposes of completing the COP. Both COPs expire in 2022, but the participants may have the option to extend up to 2 years to complete their ITSPs.

### **Interim Disbursement of Funds**

CHA permits FSS families to withdraw FSS savings funds prior to the completion of the COP if the funds are needed for meeting a goal in the ITSP, including, but not limited to:

- purchasing a car or making repairs if a vehicle is required for work;
- tuition and/or supplies for enrollment in adult basic education courses, college, graduate school, or job training;



- start-up expenses for Resident Owned Business development; or
- down payment toward the purchase of a home (e.g. independently or through participation in CHA's Choose to Own Homeownership Program)

Interim withdrawal of FSS savings funds will not be approved for payment of back rent, household expenses, household bills, credit card debt, or other non-FSS goal related expenses. FSS families may also consider requesting smaller amounts of funds (\$250 or less) from the FSS participant grant fund.

The head of FSS family must submit an interim disbursement request in writing, along with supporting documentation to their FSS Coach. Supporting documentation should include an explanation and verification of need in relation to meeting an ITSP goal. Participants must also submit a price estimate/invoice that is no more than 30-days old. Interim disbursements may not be more than 50% of the current balance of the participant's FSS savings account unless for the purposes of homeownership.

CHA FSS staff may request an in-person or telephone meeting with the FSS family to review the interim disbursement request, ask any follow-up questions related to the request and/or to collect additional documentation from the FSS family. If requested, this meeting will take place within 10 business days of the submitted request. A determination to approve or deny the request for an interim disbursement will be sent to the FSS family within two (2) business days of the meeting.

Within 30 days of receipt of the interim disbursement, FSS families must submit a receipt, bill of sale and/or account balance statement to verify the disbursement was used for its intended purpose. Failure to provide this documentation or misuse of funds may result in termination from the FSS program and/or an investigation by CHA's Office of the Inspector General. If the FSS family receives an interim disbursement and the FSS family does not complete the COP, the FSS family is not required to repay CHA unless the advance payment was provided based on fraudulent information from the FSS family.

Requests for interim disbursement will be considered on a case-by-case basis. The following chart provides examples of interim withdrawal uses.

Interim Payout Type	Examples of Price Estimates	Examples of Proof of Purchase
vehicle purchase	<ul style="list-style-type: none"> <li>• sales advertisement</li> <li>• dealership invoice</li> <li>• statement of loan</li> </ul>	bill of sale
vehicle repairs	<ul style="list-style-type: none"> <li>• Invoice or signed estimate of repairs from mechanic/repair shop</li> </ul>	receipt
tuition and/or educational supplies	<ul style="list-style-type: none"> <li>• tuition invoice or statement from institution</li> <li>• invoice for exam fees</li> <li>• printout from school webpage/bookstore with supply costs</li> </ul>	receipt
business start-up expenses	<ul style="list-style-type: none"> <li>• lease agreement, invoice for expenses/supplies</li> </ul>	receipt
down payment for home purchase	<ul style="list-style-type: none"> <li>• initial loan estimate</li> </ul>	closing disclosure or settlement statement

**Final Disbursement of FSS Savings Funds**

An FSS family is eligible to receive a full disbursement of their FSS savings account balance upon successful completion of the COP and completion of all ITSP goals. FSS families have no income tax liability for funds held in the account or for payments made at the completion of the COP. All FSS savings disbursements are made directly to the head of FSS family.

**Forfeiture of FSS Savings Funds**

The funds accrued by the FSS family will be forfeited if the COP is terminated due to non-compliance or non-completion of the ITSP, or the household uses their housing voucher to port-out to another PHA that does not administer an FSS program and the participation in CHA's program is ended.

**Earned Income Disregard**

Pursuant to CHA's FY2014 MTW Annual Plan, FSS families have the option of eliminating EID to take advantage of FSS savings accrued by gaining new employment. With the implementation of the modified pay points model, eliminating EID is no longer a benefit to the participant for the purposes of FSS savings accrual.

**FSS PARTICIPANT GRANT FUND**

Pursuant to CHA's FY2019 MTW Annual Plan, CHA has discontinued applying interest earned from the FSS savings account to individual FSS families and instead utilizes the accumulated interest to support a participant grant fund available to FSS families on a first come first serve, as needed basis. In addition to maintaining a pot of accumulated interest for the participant grant fund, CHA will maintain a pot of forfeited FSS savings. The accumulated interest and forfeited FSS savings will collectively be used to support the participant grant fund.

The FSS participant grant fund will enable participants to access support funds throughout the program, leaving their FSS savings accounts intact. All interest earned prior to March 2019 remained with the participants.

The participant grant fund is not an emergency fund, as it may take up to 60 days from the FSS family's initial request to the FSS Coach for receipt of the grant funds. Rather, CHA permits FSS families to request participant grant funds if the funds are needed for meeting a long-term goal in the ITSP, including, but not limited to:

- tuition and/or supplies for enrollment in adult basic education courses, college, graduate school, or job training;
- assistance in resolving debt owed to City Colleges of Chicago if attempting to re-enroll in a training or degree program;
- assistance in resolving debt owed to the City of Chicago for parking or speeding tickets if the participant's vehicle is required to maintain employment; or
- start-up expenses for small business development.

The FSS participant grant funds cannot be used for payment of back rent, household expenses, household bills, credit card debt, or other non-FSS goal related expenses. The limit for any grant request is \$250 and is only available to each participating family member one-time during participation in FSS and is to be paid out to the head of FSS family.

The head of FSS family must submit a grant request in writing, along with supporting documentation to their FSS Coach. Supporting documentation should include an explanation and verification of need in relation to meeting an ITSP goal. FSS families must also submit a price estimate/invoice that is no more than 30-days old.

CHA FSS staff may request an in-person or telephone meeting with the FSS family to review the grant request, ask any follow-up questions related to the request and/or to collect additional documentation from the participant. If requested, this meeting will take place within 10 business days of the submitted request. A determination to approve or deny the request for grant funds will be sent to the FSS family within two (2) business days of the meeting.

Requests for use of participant grant funds will be considered on a case-by-case basis and are limited to the funds available at the time of request.

Within 30 days of receipt of the grant disbursement, FSS families must submit a receipt, bill of sale and/or account balance statement to verify the disbursement was used for its intended purpose. Failure to provide this documentation or misuse of funds may result in termination from the FSS program and/or an investigation by CHA's Office of the Inspector General. If the FSS family receives a grant and the FSS family does not complete the COP, the FSS family is not required to repay CHA unless the advance payment was provided based on fraudulent information from the participant.

Participant Grant Type	Examples of Price Estimates	Examples of Proof of Purchase
vehicle repairs	<ul style="list-style-type: none"> <li>• Invoice or signed estimate of repairs from mechanic/repair shop</li> </ul>	receipt
tuition and/or educational supplies	<ul style="list-style-type: none"> <li>• tuition invoice or statement from institution</li> <li>• invoice for exam fees</li> <li>• printout from school webpage/bookstore with supply costs</li> </ul>	receipt
debt owed to re-enroll in a training or degree program	<ul style="list-style-type: none"> <li>• invoice or printout of amount owed</li> <li>• verification of payment plan, or agreement to enter payment plan</li> </ul>	receipt
debt owed for parking or speeding tickets	<ul style="list-style-type: none"> <li>• documentation of amount owed</li> <li>• verification of payment plan, or agreement to enter payment plan</li> </ul>	receipt
business start-up expenses	<ul style="list-style-type: none"> <li>• lease agreement, invoice for expenses/supplies</li> </ul>	receipt

## HCV PORTABILITY

### Port-Out to Another PHA

If an FSS family ports-out to another PHA, they will be terminated from CHA's FSS program. CHA will not transfer the COP or any accrued FSS funds to the receiving PHA.

### **Port-In to Another PHA**

CHA will not take on the COP and accept an FSS household porting-in from another PHA into its FSS program due to the unique requirements for completion of CHA's FSS program and the modified FSS savings model. However, the port-in household may enroll in CHA's FSS program under a new COP.

### **Conflict of Interest Clause**

If a CHA HCV FSS participant is identified to have a conflict of interest (i.e. an FSS HOH or family member is employed by an HCV Contract Administrator) CHA will handle the case in line with current policy and procedure according to the HCV Administrative Plan and/or policy advisories.

## **GRIEVANCE PROCEDURES**

CHA utilizes a progressive method of addressing complaints and/or grievances from participants related to the FSS program. If an FSS family believes that they have received unfair treatment or disagree with a decision made by CHA staff as it relates to their FSS program participation<sup>8</sup>, they should follow these steps:

### *Step #1 – FSS Manager*

The participant may bring the complaint/concern to an FSS Manager. If the participant's complaint has been escalated and addressed by an FSS Manager, and the participant does not feel a resolution has been achieved, the participant may move onto step #2.

### *Step #2 – FSS Director*

The participant submits their complaint/concern in writing to the FSS Director at [fss@thecha.org](mailto:fss@thecha.org). The FSS Director will review the complaint/concern along with relevant information submitted by the participant or contained in the participant's file. Within 10 business days of receipt of the complaint, a written determination will be provided by the FSS Director to the participant. Unless otherwise requested, all responses will be sent via email to the participant.

### *Step #3 – Resident Services Management Committee*

If the participant does not accept the determination by CHA FSS staff, they may request a face-to-face meeting with management representatives from CHA's Resident Services division. The face-to-face meeting is an opportunity for the participant to present their case in-person to a committee of two or more management-level representatives from CHA's Resident Services division. A determination will be made by the Resident Services committee and provided to the participant in writing via email, unless otherwise requested, within three business days of the face-to-face meeting.

### *Step #4 – CHA Grievance Policy*

If the participant does not accept the determination of the Resident Services committee they may request an informal hearing or formal hearing per the grievance and hearing policies and procedures adopted for the PH and HCV programs in CHA's ACOP and HCV Administrative Plan, respectively. Formal hearings are coordinated through CHA's Legal Department. Participants should consult the ACOP or HCV Administrative Plan for the process and will not go through the FSS program.

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<sup>8</sup> Examples include denial of graduation/program completion, denial of extension of the COP, denial of interim FSS savings payout, etc.

## **PROGRAM COORDINATING COMMITTEE (PCC)**

CHA maintains a PCC in accordance with FSS regulations to oversee general coordination and operation of the FSS program, including updating program policies and procedures, coordination of services between various CHA departments and vendors, and developing and coordinating local resources. 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. CHA's PCC includes one FSS coach, one or more FSS managers, representatives from various CHA departments, contracted vendors, social service program partners, representatives from the City of Chicago and/or sister agencies, and individuals from the HCV program and PH population, including current and/or past FSS participants (e.g. 1 HCV participant, 1 PH participant, 1 PBV participant, and 1 RAD and/or RAD2 participant). CHA's PCC will meet at various points each year and may conduct business on an ad-hoc basis via email, telephone conferences, or virtual meetings. These PCC meetings will be coordinated by CHA FSS staff and includes representatives from various stakeholder groups depending on the type of meeting and topics to be discussed.

## **CERTIFICATION OF COORDINATION**

To avoid duplication of services, CHA certifies the services and activities associated with its FSS program have been coordinated with HUD, local public agencies including the City of Chicago and Chicago Cook Workforce Partnership, and private and non-profit service providers, including members of the PCCs, to avoid duplication of services and activities.