

August 18, 2022

Housing Authority Board of Commissioners  
Clackamas County

Members of the Board:

**Public Hearing regarding the Housing Authority of Clackamas County  
policy updates to its Family Self-Sufficiency Action Plan.  
No County General Funds are involved.**

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| <b>Purpose/Outcome</b>                 | Holding a Public Hearing to gather public and commissioner feedback regarding the posted Housing Authority of Clackamas County's (HACC) Family Self-Sufficiency (FSS) Action Plan Policy Updates.   |
| <b>Dollar Amount and Fiscal Impact</b> | \$0<br>No County General Funds are involved.  |
| <b>Funding Source</b>                  | federal FSS Coordinator grant funds   |
| <b>Duration</b>                        | Policy changes are required to be adopted no later than September 30, 2022 and remain in effect until additional updates are needed.  |
| <b>Previous Board Action/Review</b>    | August 2, 2022 – FSS Memo and Summary of policy changes was presented at Issues and a request to schedule a public hearing was made.<br>July 29, 2022 – FSS Action Plan Proposed Changes public notice in the Oregonian was provided to encourage public comments.<br>July 26-September 9, 2022 – FSS Action Plan with proposed policy updates is posted on HACC's website and open for public comment for 45 days, as required by HUD.   |
| <b>Strategic Plan Alignment</b>        | How does this item align with your Department's Strategic Plan goals?<br>The proposed policy changes align with H3S's strategic priority to increase self-sufficiency for our clients.<br>How does this item align with the County's Performance Clackamas goals?<br>The updates to the FSS Action Plan align with the County's strategic priority to ensure safe, healthy, and secure communities by providing households with greater housing options and pathways to self-sufficiency. |
| <b>Counsel Review</b>                  | Not applicable – This is a public hearing   |
| <b>Procurement Review</b>              | 1. Was the item processed through Procurement? yes <input type="checkbox"/> no <input checked="" type="checkbox"/><br>2. If no, provide brief explanation: This is a public hearing.  |
| <b>Contact Person</b>                  | Toni Karter, HACC Interim Executive Director (503) 650-3139   |
| <b>Contract No.</b>                    | N/A   |

The Housing Authority of Clackamas County (HACC), a Division of the Health, Housing and Human Services Department of Clackamas County is updating policies, as required by U.S. Department of Housing & Urban Development (HUD), in accordance with the HUD's Final Rule published on June 16, 2022.

**BACKGROUND:**

HACC has been operating the FSS Program since 1999, to help families make progress toward self-sufficiency and establish escrow accounts for money management, homeownership, and education in the future. A full-time FSS coordinator, funded through federal grant funds, assures that FSS program participants are connected to the supportive services they need to achieve self-sufficiency and work toward graduating from assistance.

HUD requires Housing Authorities operating an FSS program to maintain a FSS Action Plan. The FSS Action Plan provides the policies used to implement and maintain the FSS Program in accordance with HUD regulations.

On May 17, 2022, HUD issued a final rule amending the regulations for implementing the FSS program as required by the Economic Growth, Regulatory Relief, and Consumer Protection Act (“the Economic Growth Act” or “the Act”). Section 306 of the Act made multiple amendments to the FSS program and requires that HACC update their FSS Action Plan to bring their Plan into alignment with these new regulations. In June and July, HUD released FAQs, to help clarify the changes and to assist Housing Authorities in updating their Action Plans.

HACC’s proposed changes to their FSS Action Plan were drafted and posted for public review starting July 26, 2022. All proposed changes will enhance the program and will benefit the participants overall. Changes will be made to the following Chapters noted below and all other chapters of the current plan will remain unchanged. See the details of the changes in Attachment A – Summary of FSS Policy Updates attached.

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| <p><b>Chapter 1 – FSS Program and FSS Action Plan</b></p> <ul style="list-style-type: none"><li>○ Including participants from other programs including tenant &amp; project-based voucher and Foster Youth to Independence (FYI)</li><li>○ Including Public Housing (PH) &amp; Housing Choice Voucher (HCV) Demographics</li></ul>  |
| <p><b>Chapter 3 – Program Administration</b></p> <ul style="list-style-type: none"><li>○ Clarifying responsibilities of the FSS Coordinator (p. 3-2)</li><li>○ Clarifying use of PH &amp; HCV administrative fees to cover FSS program (p. 3-3, 3-4)</li><li>○ Clarifying use of forfeited escrow funds (p. 3-5)</li><li>○ Stating HACC space is available for providing supportive services to participants (p. 3-6)</li><li>○ Adding a resident from HCV &amp; PH to the Program Coordinating Committee (PCC) &amp; include groups in outreach for additional members (p. 3-7)</li><li>○ Clarifying organizations who will have leadership roles in the PCC (p. 3-8-3-14)</li></ul> |
| <p><b>Chapter 4 – Selecting and Serving FSS Families</b></p> <ul style="list-style-type: none"><li>○ Clarifying responsibilities of the FSS Coordinator (p. 4-4)</li><li>○ Clarifying outreach methods and languages (p. 4-5)</li><li>○ Adding a preference for Foster Youth to Independence participants (p. 4-7)</li><li>○ Clarifying how participants are selected if a waitlist exists (p. 4-9)</li><li>○ Remove eligibility barrier if a resident owes money to a Housing Authority, but escrow funds will go to paying off debt (p. 4-10)</li><li>○ Clarifying that HACC will not skip a family if a service is needed that cannot be provided by HACC (p. 4-10)</li></ul>      |

- Remove eligibility barrier if a resident has participated in the FSS program, but did not successfully complete their goals, if there was a good cause is provided (p. 4-11)
- Remove eligibility barrier if a resident owes money to a Housing Authority, but escrow funds will go to paying off debt (p. 4-10)
- List all the partners who partner with HACC to provide supportive services (p. 4-14)

**Chapter 6 – Escrow Account**

- Clarifying family can only be approved for one escrow disbursement (p. 6-3)
- Clarifying monthly escrow credit (p. 6-7)

**Chapter 7 – Portability in Section 8 FSS Programs**

- Clarifying that HACC will consider a family’s request to move outside Clackamas County within the first 12 months (p. 7-2)
- Clarifying that HACC will not retain FSS participants in Clackamas County if they move outside Clackamas County (p. 7-3)
- Adding the FSS Coordinator will discuss options with FSS participant if they move outside Clackamas County (p. 7-4)
- Clarifying that if the Housing Authority where the participant is moving does not have an FSS, then the participant can no longer participate in FSS, but FSS Coordinator will discuss options (described 7-5). HACC may continue to serve the FSS participant under certain circumstances (p. 7-5)

The feedback from today’s public hearing and all public comments submitted during the day public comment period will be recorded in the final draft of the updated FSS Action Plan. Any further updates released from HUD regarding these updated regulations will also be incorporated into the final updated plan draft.

Further information can be found at the Housing Authority Website at <https://www.clackamas.us/housingauthority/plansandreports.html>

**RECOMMENDATION:**

Staff respectfully recommends the Housing Authority Board move the approval and authorization to submit the updated FSS Action Plan to HUD on the September 22, 2022 consent agenda to meet the September 30, 2022 HUD submission deadline.

**ATTACHMENTS:**

- Attachment A - Summary of FSS Policy Updates

Respectfully submitted,

*Denise Swanson*

Rodney A. Cook, Director  
Health, Housing and Human Services

**ATTACHMENT A**

**Summary of Proposed FSS Action Plan Policy Changes Effective Upon Board Approval**

| Chapter | Old Policy Language  | New Policy Language  | Summary  |
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| 1-II.C  | <p><b>Single Action Plan [24 CFR 984.201(f)]</b><br/> <u><b>HACC Policy</b></u><br/>                     The PHA is implementing both an HCV FSS program and a public housing FSS program and will submit one action plan, the policies in which apply to both programs.</p> | <p><b>Single Action Plan [24 CFR 984.201(f)]</b><br/> <u><b>HACC Policy</b></u><br/>                     The PHA is implementing both a public housing and Section 8 FSS program, which may include tenant-based and project-based Section 8, and Foster Youth to Independence Initiative (FYI). The PHA will submit one action plan, the policies in which apply to both programs.</p>  | <p><b>Including the other programs that are under Section 8 that can participate in FSS.</b></p> |
| 1-II.D. | <p><b>Contents of the Plan [24 CFR 984.201(d)]</b><br/> <u><b>HACC Policy</b></u><br/>                     None</p>  | <p>Contents of the Plan [24 CFR 984.201(d)]<br/>                     HACC Policy</p> <p>The PHA will submit additional optional information in this action plan that will help HUD determine the soundness of the proposed FSS program.</p> <p>This information includes:</p> <p>Policies related to the modification of goals in the ITSP. (Chapter 5)</p> <p>Policies on the circumstances in which an extension of the contract of participation may be granted. (Chapter 5)</p> <p>Policies on the interim disbursement of escrow, including any limitations on the use of the funds. (Chapter 6)</p> <p>Policies regarding eligible uses of forfeited escrow funds by families in good standing. (Chapter 6)</p> <p>Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating. (Chapter 4)</p> | <p><b>Adding clarity and providing transparency to policies that have been modified.</b></p>     |

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|         |  | <p>Policies on requirements for documentation for goal completion. (Chapter 4)</p> <p>Policies on documentation of the household's designation of the "head of FSS family." (Chapter 4)</p> <p>Policies for providing an FSS selection preference for porting families if the PHA elects to offer such a preference. (Chapter 7)</p>               |  |
| 1-II.E. | <p><b>FAMILY DEMOGRAPHICS [24 CFR 984.201 (d)(1)]</b><br/> <u>HACC Policy</u><br/> Existing Demographics</p>   | <p><b>FAMILY DEMOGRAPHICS [24 CFR 984.201 (d)(1)]</b><br/> <u>HACC Policy</u><br/> Updated demographics</p>  | <p>Updating current demographics that are participating in both the Section 8 program as well as the public housing program.</p> |
| 2-II.C. | <p><b>COOPERATIVE AGREEMENTS [24 CFR 984.106]</b><br/> <u>HACC Policy</u><br/> None</p>  | <p><b>COOPERATIVE AGREEMENTS [24 CFR 984.106]</b><br/> <u>HACC Policy</u><br/> The PHA will <u>not</u> enter into a Cooperative Agreement with multifamily-assisted housing owners to voluntarily make its FSS program available to those owner's housing residents.</p>   | <p>Specifying that non-public housing residents and non-voucher participants are not able to enroll in HACC's FSS Program.</p>   |
| 2-II.D. | <p><b>ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)]</b><br/> <u>Estimate of Eligible Families</u><br/> 50-75 eligible FSS families can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated federal, tribal, state, local, and private resources.</p> | <p><b>ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)]</b><br/> <u>Estimate of Eligible Families</u><br/> Per FSS Coordinator, 50-100 eligible FSS families can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated federal, tribal, state, local, and private resources.</p> | <p>Adjusting maximum participant number.</p>   |
| 2-II.E. | <p><b>ELGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201 (d)(3)]</b><br/> <u>HACC Policy</u><br/> The PHA does not operate other self-sufficiency programs and therefore no additional families from other programs are expected to execute an FSS contract of participation.</p>                         | <p><b>ELGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201 (d)(3)]</b><br/> <u>HACC Policy</u><br/> The PHA operates Resident Opportunity and Self-Sufficiency program in the Public Housing program in which 53 families are</p>   | <p>Revised to include HACC's Self-Sufficiency Programs.</p>  |

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|         |   | <p>enrolled. Of those families enrolled, 4 are expected to execute an FSS contract of participation.</p> <p>The PHA operates the FYI operating in the Section 8 program in which 24 families are enrolled. Of those families enrolled, 8 are expected to execute an FSS contract of participation.</p>  |   |
| 2-IV.A. | <p><b>DEFINITIONS [24 CFR 984.103]</b><br/> <u><b>HACC Policy</b></u></p> | <p><b>DEFINITIONS [24 CFR 984.103]</b><br/> <u><b>HACC Policy</b></u></p> <p>Benefits means a government benefit of money or monetary value given to an individual by a federal, state, or local government agency for purposes of financial assistance, including but not limited to, Medicaid, supplemental nutritional assistance program benefits and Social Security, Temporary Assistance for Needy Families, and unemployment compensation benefits.</p> <p>Benefits cliff means the sudden and often unexpected decrease in public benefits that can occur with a small increase in earnings. When income increases, families sometimes lose some or all economic supports.</p> <p>Certain interim goals means the family has met all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date.</p> <p>Enhance the effectiveness of the FSS program means a demonstrable improvement in the quality of an FSS program in which the enrollment ratio,</p> | <p><b>Added definitions for terms that were not listed in previous Action Plan.</b></p> |

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|        |   | <p>escrow balance average, and graduation rate is at or above the national average as measured in HUD's Composite Scores in FR Notice 11/15/18.</p> <p>Other costs related to achieving obligations in the contract of participation means any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP.</p> <p>Supports means, but is not limited to, transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator.</p> |   |
| 3-I.C. | <p><b>FSS PROGRAM COORDINATOR RESPONSIBILITIES</b><br/> <u>HACC Policy</u><br/> None</p>                      | <p><b>FSS PROGRAM COORDINATOR RESPONSIBILITIES</b><br/> <u>HACC Policy</u><br/> The PHA will request and provide the rationale to the HUD Field Office to require the FSS Program Coordinator to perform the routine Section 8 or public housing program functions of housing eligibility, lease up, rent calculation, and portability that are funded through Section 8 administrative fees or public housing operating funds.</p>  | <p>Added description of FSS Coordinator responsibilities.</p> |
| 3-I.D. | <p><b>ADMINISTRATIVE FEES AND COSTS</b><br/> Public Housing FSS Program<br/> <u>HACC Policy</u><br/> None</p> | <p><b>ADMINISTRATIVE FEES AND COSTS</b><br/> Public Housing FSS Program<br/> <u>HACC Policy</u><br/> The PHA will make funds available from the public housing operating fund to provide</p>   | <p>Added to reflect current funding practices.</p>            |

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|        |   | <p>administrative costs to the public housing FSS program.</p> <p>The PHA will not make funds available from the Section 8 administrative fees or unrestricted net position to provide administrative costs to the Section 8 FSS program.</p>  |   |
| 3-I.E. | <p><b>SUPPORTIVE SERVICES FEES AND COSTS</b><br/> <b>Public Housing FSS Supportive Services</b><br/> <u>HACC Policy</u><br/> None</p> | <p><b>SUPPORTIVE SERVICES FEES AND COSTS</b><br/> <b>Public Housing FSS Supportive Services</b><br/> <u>HACC Policy</u><br/> The PHA will not make funds available from the Section 8 unrestricted net position or public housing operating funds to provide supportive services costs to the FSS program.</p>   | <p>Added to reflect current funding practices.</p>                        |
| 3-I.F. | <p><b>TREATMENT OF FORFEITED FSS ACCOUNT FUNDS FOR THE BENEFIT OF FSS PARTICIPANTS</b><br/> <u>HACC Policy</u><br/> None</p>          | <p><b>TREATMENT OF FORFEITED FSS ACCOUNT FUNDS FOR THE BENEFIT OF FSS PARTICIPANTS</b><br/> <u>HACC Policy</u><br/> The PHA will use forfeited escrow accounts for support and other costs for FSS participants in good standing when funds requested are needed to complete an interim goal or task in the ITSP and are not ongoing expenses or if the family can demonstrate that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals in the ITSP.<br/> The PHA will use forfeited escrow accounts for training provided to FSS Coordinators.<br/> The PHA will define supports as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to</p> | <p>Added to specify how HACC will utilize forfeited FSS escrow funds.</p> |



achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s)

The PHA will define other costs related to achieving obligations in the CoP as any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s).

The PHA will define necessary to complete as meaning that no other resources are available in the community either because such a resource is non-existent or that resources are utilized above capacity and agencies cannot, for an indetermined period, provide such a resource.

The PHA will provide funds from the forfeited escrow account to FSS participants in good standing before requiring the participant to use an “interim” disbursement from their current escrow account so long as:

The funds requested are needed to complete an interim goal or task within the CoP and are not ongoing expenses; or

If the family has demonstrated that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.

The PHA will prioritize requests for funds from forfeited escrow accounts initially on a first come first served basis based on the date and time of the request. After that order is

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|         |  | <p>established, while still preserving the first come first served basis, the PHA will apply the following priorities:</p> <p>Priority 1: Funds to meet a goal in the ITSP that is necessary to ensure the safety and wellbeing of victims of domestic violence, dating violence, sexual assault, and stalking as defined in the PHA's Section 8 Administrative Plan and public housing Admissions and Continued Occupancy Policy regarding VAWA.</p> <p>Priority 2: Funds to meet a goal in the ITSP that is necessary to stabilize health, safety, and welfare of the FSS participant or family that if left unattended would jeopardize education, training, or employment.</p> <p>Priority 3: Funds to meet a goal in the ITSP that is necessary to further education, training, and employment goals in the ITSP including childcare, transportation, and medical costs if the lack of any of these prevents completion of the education, training, and employment.</p> <p>Priority 4: Funds to meet a goal in the ITSP that is necessary to further any other goal or tasks.</p> |   |
| 3-II.B. | <p><b>PROGRAM COORDINATING COMMITTEE MEMBERSHIP</b><br/> <b>Required PCC Membership[CFR 984.202(b)(1)]</b><br/> <u><b>HACC Policy</b></u><br/> The PHAs representative to the program coordinating committee will be the FSS coordinator(s).</p> | <p><b>PROGRAM COORDINATING COMMITTEE MEMBERSHIP</b><br/> <b>Required PCC Membership[CFR 984.202(b)(1)]</b><br/> <u><b>HACC Policy</b></u><br/> The PHA's representatives to the program coordinating committee will be at least one FSS Program Coordinator and one or more participants from each of the housing programs in which there is an FSS program: Section 8, and public housing.</p>  | <p><b>Added mandatory resident participation.</b></p> |

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| 3-II.C. | <b>PROGRAM COORDINATING COMMITTEE MEMBERSHIP</b><br><b>Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)]</b><br><u>HACC Policy</u><br>None   | <b>PROGRAM COORDINATING COMMITTEE MEMBERSHIP</b><br><b>Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)]</b><br><u>HACC Policy</u><br>The PHA will seek assistance in identifying potential members of the PCC from area-wide, city-wide, and development-based resident councils, the resident management corporation, or the Resident Advisory Board.   | New to Action Plan.   |
| 4-II.C. | <b>FSS SELECTION PREFERENCES</b><br><i>Previous Participation Selection Factor</i><br><u>HACC Policy</u><br>The PHA will not select a family for participation in the FSS program a second time if that family previously participated and did not complete. As always, reasonable accommodation will be considered for an exception. | <b>FSS SELECTION PREFERENCES</b><br><i>Previous Participation Selection Factor</i><br><u>HACC Policy</u><br>The PHA will not refuse to select a family for participation in the FSS program a second time if that family previously participated and did not complete.   | Revised to allow previous participants a second chance to enroll in FSS.  |
| 4-II.D. | <b>SELECTION OF HEAD OF HOUSEHOLD</b><br><u>HACC Policy</u><br>None   | <b>SELECTION OF HEAD OF HOUSEHOLD</b><br><u>HACC Policy</u><br>The PHA will meet with the family and detail the obligations, rights, and privileges that pertain to the FSS head of household and require each adult family member to certify their agreement as to their designated head of the FSS family. These certifications will be a permanent part of the FSS family's record and will be updated with each change of head of household. | Added to reflect new regulation that any household member can participate in FSS. Limit one member per household. |
| 5-I.C.  | <b>FAMILY OBLIGATIONS</b><br><b>Compliance with Lease Terms [24 CFR 984.303(b)(3)]</b><br><u>HACC Policy</u>  | <b>FAMILY OBLIGATIONS</b><br><b>Compliance with Lease Terms [24 CFR 984.303(b)(3)]</b><br><u>HACC Policy</u>   | Revised policy regarding termination of CoP in regards to complying with lease terms.                             |

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|                | The PHA’s FSS program will terminated the FSS contract of participation for failure to comply with the terms of the lease.   | The PHA’s FSS program will not terminated the FSS contract of participation for failure to comply with the terms of the lease.  |  |
| <b>5-II.C.</b> | <p><b>MODIFICATION OF THE CONTRACT</b><br/><b><u>HACC Policy</u></b></p> <p>When modifications to the ITSP improve the participant’s ability to complete their obligations in the CoP or progress toward economic self-sufficiency.</p> <p>When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, , designate another family member to be the FSS head of household and receive escrow funds.</p> <p>When an FSS family moves to the jurisdiction of a receiving PHA that does not have an FSS program and the family may not continue participation in the FSS program, and modification of the FSS contract will allow the family to complete the contract and receive an escrow disbursement or terminate the contract with escrow disbursement.</p> | <p><b>MODIFICATION OF THE CONTRACT</b><br/><b><u>HACC Policy</u></b></p> <p>When modifications to the ITSP improve the participant’s ability to complete their obligations in the CoP or progress toward economic self- sufficiency.</p> <p>When the actual end date of the CoP is determined by the effective date of the FSS family’s first reexamination changes the end date of the CoP.</p> <p>When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, , designate another family member to be the FSS head of household and receive escrow funds.</p> <p>When an FSS family moves to the jurisdiction of a receiving PHA that does not have an FSS program and the family may not continue participation in the FSS program, and modification of the FSS contract will allow the family to complete the contract and receive an escrow disbursement or terminate the contract with escrow disbursement.</p> | Added paragraph 2 – actual end date won’t be known at time of FSS enrollment.                    |
| <b>5-II.E.</b> | <p><b>TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE</b><br/><b><u>HACC Policy</u></b></p> <p>The PHA will not continue to offer supportive services to a former FSS family who has completed its contract of participation, and whose head of family is employed.</p>   | <p><b>TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE</b><br/><b><u>HACC Policy</u></b></p> <p>The PHA will continue to offer supportive services to a former FSS family who has completed its contract of participation.</p>  | Some supportive services will be available after FSS graduation (i.e. IDA account disbursement). |

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| 7-I.C. | <p><b>RESIDENCY REQUIREMENTS</b><br/> <u>HACC Policy</u></p> <p>The PHA will not approve a family’s request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation.</p> | <p><b>RESIDENCY REQUIREMENTS</b><br/> <u>HACC Policy</u></p> <p>The PHA will consider a family’s request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation if the move is in accordance with the regulations for such moves at 24 CFR 982.353.</p> | <p>Revised “will not approve” to HACC “will consider”.</p> |
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