
**FSS Action Plan
for the Housing Authority of
Clackamas County's
Family Self-Sufficiency Program**

July 2022



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**FSS Action Plan
TABLE OF CONTENTS**

**CHAPTER 1
THE FAMILY SELF-SUFFICIENCY PROGRAM AND THE FSS ACTION PLAN**

PART I: THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM AND FSS ACTION PLAN	1
1-I.A. OVERVIEW OF THE FAMILY SELF-SUFFICIENCY PROGRAM	1
1-I.B. APPLICABLE REGULATIONS	2
1-I.C. THE FAMILY SELF-SUFFICIENCY ACTION PLAN	2
PART II: REQUIREMENTS OF THE FSS ACTION PLAN.....	3
1-II.A. OVERVIEW	3
1-II.B. HUD APPROACH TO POLICY DEVELOPMENT.....	3
1-II.C. FSS ACTION PLAN DEVELOPMENT AND REVISION.....	4
Development of Action Plan [24 CFR 984.201(b) and (c)].....	4
Single Action Plan [24 CFR 984.201(f)]	4
Revision to the FSS Action Plan [24 CFR 984.201(c)(2)]	4
1-II.D. CONTENTS OF THE PLAN [24CFR 984.201(d)].....	5
Optional Additional Information [24 CFR 984.201(d)(13)].....	6
1-II.E. FAMILY DEMOGRAPHICS [24 CFR 984.201(d)(1)].....	7

CHAPTER 2
PURPOSE, SCOPE, AND APPLICABILITY OF THE
FAMILY SELF-SUFFICIENCY PROGRAM

PART I: PURPOSE AND BASIC REQUIREMENTS OF THE FSS PROGRAM..... 3
 2-I.A. PURPOSE 3
 2-I.B. PROGRAM OBJECTIVES [24 CFR 984.102]..... 3
 2-I.C. BASIC REQUIREMENTS OF THE FSS PROGRAM [24 CFR 984.104] 3

PART II: SCOPE OF THE FSS PROGRAM..... 5
 2-II.A. HOUSING-ASSISTED FAMILIES ELIGIBLE TO PARTICIPATE IN FSS 5
 2-II.B. PHAs REQUIRED TO OPERATE AN FSS PROGRAM..... 5
 Mandatory Minimum Program Size (MMPS) [24 CFR 984.105] 5
 2-II.C. COOPERATIVE AGREEMENTS [24 CFR 984.106] 7
 2-II.D. ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)]..... 7
 2-II.E. ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS
 [24 CFR 984.201(d)(3)] 7
 2-II.F. ELIGIBILITY OF A COMBINED PROGRAM [24 CFR 984.201(e)] 8

PART III: PROGRAM OPERATION 9
 2-III.A. OVERVIEW 9
 2-III.B. PROGRAM IMPLEMENTATION DEADLINE 9
 Voluntary Program [24 CFR 984.301(a)] 9
 2-III.C. TIMETABLE FOR PROGRAM IMPLEMENTATION
 [24 CFR 984.201(d)(13)] 10

PART IV: DEFINITIONS 11
 2-IV.A. DEFINITIONS [24 CFR 984.103] 11

**CHAPTER 3
PROGRAM ADMINISTRATION**

PART I: STAFFING, FEES AND COSTS, AND ON-SITE FACILITIES	1
3-I.A. OVERVIEW.....	1
3-I.B. PROGRAM ADMINISTRATION STAFF AND CONTRACTORS [24 CFR 984.301(b)].....	1
3-I.C. FSS PROGRAM COORDINATOR RESPONSIBILITIES	2
Primary Role of the FSS Program Coordinator	2
3-I.D. ADMINISTRATIVE FEES AND COSTS	3
Section 8 FSS Program	3
Public Housing FSS Program	3
3-I.E. SUPPORTIVE SERVICES FEES AND COSTS.....	4
Section 8 FSS Supportive Services.....	4
Public Housing FSS Supportive Services.....	4
3-I.F. USE OF FORFEITED ESCROW ACCOUNTS FUNDS	5
3-I.G. ON-SITE FACILITIES	6
PART II: PROGRAM COORDINATING COMMITTEE	7
3-II.A. OVERVIEW	7
3-II.B. PROGRAM COORDINATING COMMITTEE MEMBERSHIP.....	7
Required PCC Membership [24 CFR 984.202(b)(1)].....	7
Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)]	7
Recommended PCC Membership [24 CFR 984.202(b)(2)]	8
3-II.C. ALTERNATIVE PCC COMMITTEE [24 CFR 984.202(c)]	8
EXHIBIT 3-1: CHART FOR DETERMINING PCC MEMBERSHIP	9

**CHAPTER 4
SELECTING AND SERVING FSS FAMILIES**

PART I: INCENTIVES, OUTREACH, AND ASSURANCE OF NONINTERFERENCE..... 3

 4-I.A. OVERVIEW..... 3

 4-I.B. INCENTIVES FOR PARTICIPATION [24 984.201(d)(5)]..... 4

 4-I.C. OUTREACH EFFORTS [24 CFR 984.201(d)(6)(i)(ii)] 5

 4-I.D. ASSURANCE OF NONINTERFERENCE WITH THE RIGHTS OF
NONPARTICIPATING FAMILIES [24 CFR 984.201(d)(10)]..... 6

PART II: FAMILY SELECTION 7

 4-II.A. OVERVIEW 7

 4-II.B. FSS SELECTION PREFERENCES 7

 4-II.C. SELECTION FACTORS 8

 Motivation Selection Factors [24 CFR 984.203(d)(1)]..... 8

 Other Selection Factors..... 9

 4-II.D. SELECTION OF HEAD OF HOUSEHOLD 10

PART III: ACTIVITIES AND SUPPORT SERVICES 11

 4-III.A. OVERVIEW 11

 4-III.B. METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS
[24 CFR 984.201(d)(8)] 11

 4-III.C. FSS ACTIVITIES AND SUPPORT SERVICES DESCRIPTION
[24 CFR 984.201(d)(7)] 12

 4-III.D. CERTIFICATION OF COORDINATION [24 CFR 984.201(D)(12)]..... 15

**CHAPTER 5
CONTRACT OF PARTICIPATION**

PART I: OVERVIEW AND FAMILY OBLIGATIONS..... 1

 5-I.A. OVERVIEW..... 1

 5-I.B. CONTENTS OF THE CONTRACT OF PARTICIPATION 2

 Individual Training and Services Plan..... 2

 5-I.C. FAMILY OBLIGATIONS..... 3

 Compliance with Lease Terms [24 CFR 984.303(b)(3)] 3

 Employment Obligation [24 CFR 984.303 (b)(4)] 4

 5-I.D. CONSEQUENCES OF NONCOMPLIANCE WITH THE CONTRACT 5

PART II: CONTRACT SPECIFICATIONS 7

 5-II.A. OVERVIEW 7

 5-II.B. CONTRACT TERM [24 CFR 984.303(c)]..... 7

 Contract Extension [24 CFR 984.303(d)]..... 7

 5-II.C. MODIFICATION OF THE CONTRACT 8

 5-II.D. COMPLETION OF THE CONTRACT 9

 5-II.E. TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE..... 9

 5-II.F. TERMINATION OF THE CONTRACT 10

 Termination of the Contract with Escrow Distribution
[24 CFR 984.303(k)]..... 10

 Termination of the Contract without Escrow Distribution
[24 CFR 984.303(h)]..... 10

 5-II.G. OPTION TO WITHHOLD SUPPORTIVE SERVICE
[24 CFR 984.303(b)(5)(i)] 12

 5-II.H. PHA OBLIGATION TO MAKE GOOD FAITH EFFORT TO REPLACE
UNAVAILABLE SUPPORT SERVICES [24 CFR 984.303(e)]..... 12

 5-II.I. GRIEVANCE PROCEDURES 13

**CHAPTER 6
ESCROW ACCOUNT**

PART I: THE ESCROW ACCOUNT 1

6-I.A. OVERVIEW..... 1

6-I.B. CALCULATING THE FSS CREDIT AMOUNT 2

 Determination of Baseline Annual Earned Income and Baseline Monthly Rent ... 2

 Determination of the Escrow Credit 2

 Determination of Escrow Credit for Families Who Are Not Low Income..... 2

 Increases in FSS Family Income [24 CFR 984.304] 2

 Cessation of FSS Credit [24 CFR 984.305(b)(4)] 2

6-I.C. DISBURSEMENT OF FSS ACCOUNT FUNDS 3

 Disbursement Before Completion of Contract 3

 Disbursement at Completion of Contract [24 CFR 984.305(c)(1) and 24 984.305(c)(2)(i)]..... 3

 Disbursement at Contract Termination [24 CFR 984.305(c)(3)]..... 4

 Verification of Family Certification at Disbursement 4

 Succession to FSS Account [24 CFR 984.305(d)]..... 5

6-I.D. USE OF FSS ACCOUNT FUNDS FOR HOMEOWNERSHIP 6

6-I.E. USE OF FORFEITURE OF FSS ACCOUNT FUNDS 6

 Treatment of Forfeited FSS Account Funds 6

PART II: ESCROW FUND ACCOUNTING AND REPORTING 7

6-II.A. OVERVIEW 7

6-II.B. ACCOUNTING FOR FSS ACCOUNT FUNDS..... 7

 Crediting the Escrow Account [24 CFR 984.305(a)(2)(i)] 7

 Proration of Investment Income [24 CFR 984.305(a)(2)(ii)] 7

 Reduction of Amounts Due by FSS Family [24 CFR 984.305(a)(2)(iii)] 7

6-II.C. REPORTING ON THE FSS ACCOUNT..... 8

CHAPTER 7
PORTABILITY IN SECTION 8 FSS PROGRAMS

PART I: PORTABILITY IN THE FSS PROGRAM 1

 7-I.A. OVERVIEW..... 1

 7-I.B. DEFINITIONS 2

 7-I.C. RESIDENCY REQUIREMENTS 2

 7-I.D. PORTABILITY REQUIREMENTS FOR FSS PARTICIPANTS 3

 Receiving PHA Administers an FSS Program [24 CFR 984.306(b)]..... 3

 Receiving PHA Does Not Administer an FSS Program [24 CFR 984.306(c)] 4

 Single Contract of Participation..... 4

 Termination of FSS contract and Forfeiture of Escrow Account [984.306(e)] 4

 7-I.E. NEW FSS ENROLLMENT INTO RECEIVING PHA’S FSS PROGRAM 5

 Administering and Billing of the Voucher..... 5

 Absorption of the Voucher..... 5

PART II: REPORTING 7

 7-II.A. OVERVIEW 7

 7-II.B. CONTENTS OF THE FSS REPORT [24 CFR 984.401]..... 7

 7-II.C. FAMILY SELF-SUFFICIENCY GRANT PROGRAM REVIEW
 PHA SELF-ASSESSMENT 7

Chapter 1

THE FAMILY SELF-SUFFICIENCY PROGRAM AND THE FSS ACTION PLAN

INTRODUCTION

This chapter provides an overview of the family self-sufficiency (FSS) program and FSS action plan, including the purpose, organization, and required contents of the FSS action plan.

Part I: The Family Self-Sufficiency (FSS) Program and FSS Action Plan: This part provides an overview of the family self-sufficiency program and the purpose of the FSS action plan.

Part II: Requirements of the FSS Action Plan: This part covers action plan requirements, including development, revision, and contents of the action plan. It also contains information on family demographics, which is part of the required contents of the action plan.

PART I: THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM AND FSS ACTION PLAN

1-I.A. OVERVIEW OF THE FAMILY SELF-SUFFICIENCY PROGRAM

The origins of the FSS program are in two pilot projects implemented in 1986 and 1990, Project Self-Sufficiency and Operation Bootstrap, respectively. These projects were set up to test self-sufficiency programs for families with housing subsidies, and both demonstrated that families needed essential services to move toward economic self-sufficiency. These services include child care, transportation, medical care, and long-term education and training.

In the wake of the successful demonstration of these projects, family self-sufficiency became one of the initiatives under the Homeownership and Housing Opportunities for People Everywhere (HOPE) program enacted in 1990, and the FSS program was subsequently created under the National Affordable Housing Act the same year.

FSS built upon and refined both Project Self-Sufficiency and the Bootstrap program. It remained a voluntary program in 1991 and 1992 but became mandatory in 1993 for any new increments of funding issued to PHAs. The 1993 regulations were further modified by the Quality Housing and Work Responsibility Act of 1998 (QHWRA). In 2018, expansive changes were made to the FSS program by the Economic Growth, Regulatory Relief, and Consumer Protection Act known as “the Economic Growth Act” or “the Act.”

The purpose of the FSS program is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. The purpose and basic requirements of the FSS program are further elaborated upon in Chapter 2.

This family self-sufficiency program is administered by the **Housing Authority of Clackamas County (HACC)** for the jurisdiction of **City of Oregon City / County of Clackamas**].

1-I.B. APPLICABLE REGULATIONS

Applicable regulations for Section 8 and public housing FSS programs include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 902: Public Housing Assessment System
- 24 CFR Part 903: Public Housing Agency Plans
- 24 CFR Part 945: Designated Housing
- 24 CFR Part 960: Public Housing Admission and Occupancy Policies
- 24 CFR Part 965: PHA-Owned or Leased Projects—General Provisions
- 24 CFR Part 966: Public Housing Lease and Grievance Procedures
- 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- 24 CFR Part 984: Section 8 and Public Housing Family Self-Sufficiency Program

1-I.C. THE FAMILY SELF-SUFFICIENCY ACTION PLAN

The family self-sufficiency (FSS) action plan is required by HUD. The purpose of the FSS action plan is to establish policies for conducting the family self-sufficiency program in a manner consistent with HUD requirements and local goals and objectives contained in the PHA's Agency Plan. This FSS action plan is a supporting document to the PHA Agency Plan and is available for public review as required by 24 CFR Part 903.

This family self-sufficiency action plan is set forth to define the PHA's local policies for operation of the program in the context of federal laws and regulations. All issues related to FSS not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable laws. The policies in this FSS action plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

The PHA is responsible for complying with all changes in HUD regulations pertaining to the FSS program. If such changes conflict with this plan, HUD regulations will take precedence.

Administration of the FSS program and the functions and responsibilities of PHA staff shall comply with the PHA's personnel policy and HUD's family self-sufficiency regulations, as well as all Section 8 and public housing regulations, in addition to federal, state, and local fair housing laws and regulations.

PART II: REQUIREMENTS OF THE FSS ACTION PLAN

1-II.A. OVERVIEW

A PHA must have a HUD-approved action plan before implementing an FSS program, regardless of whether the FSS program is a mandatory or voluntary program. Further, this action plan must comply with the requirements specified for the plan in the regulations [24 CFR 984.201(a)].

The regulatory requirements dealing specifically with the FSS action plan itself largely involve the development, revision, and required contents of the action plan. This part covers those requirements.

1-II.B. HUD APPROACH TO POLICY DEVELOPMENT

In developing policy for the FSS action plan, PHAs need to be aware of the distinction HUD makes between mandatory and discretionary policies.

- *Mandatory policies* are those driven by legislation, regulations, current handbooks, notices, and legal opinions.
- *Discretionary policies* consist of those developed for areas in which the PHA has regulatory discretion, or regarding optional, nonbinding guidance including guidebooks, notices that have expired, and recommendations from individual HUD staff.

HUD expects PHAs to develop policies and procedures that are consistent with mandatory regulations and to make clear the optional policies the PHA has adopted. The PHA's FSS action plan is the foundation of those policies and procedures for the FSS program. HUD's directions require PHAs to make policy choices that provide guidance to staff and consistency to program applicants and participants.

Following HUD guidance, even though it is not mandatory, provides a PHA with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If a PHA adopts an alternative strategy, it must make its own determination that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's safe harbor, but PHAs should carefully consider those decisions.

1-II.C. FSS ACTION PLAN DEVELOPMENT AND REVISION

Development of Action Plan [24 CFR 984.201(b) and (c)]

When developing an FSS action plan, a PHA must do so in consultation with the chief executive officer of the applicable unit of general local government and the program coordinating committee (PCC).

For all voluntary or mandatory FSS programs, the PHA must submit its action plan and obtain HUD approval of the plan before it can implement the FSS program. This includes a voluntary program established because the PHA chose to implement an FSS program that exceeds the minimum size for a mandatory program (see Section 2-II.A. for a discussion of mandatory versus voluntary FSS programs).

Single Action Plan [24 CFR 984.201(f)]

PHAs implementing both a Section 8 FSS program and a public or Indian housing FSS program may submit one action plan. In cases where the PHA decides to submit one plan for more than one program, the policies contained in the action plan would apply to both programs.

PHA Policy

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.

Revision to the FSS Action Plan [24 CFR 984.201(c)(2)]

Following HUD's initial approval of the action plan, no further approval of the action plan is required unless the PHA proposes to make policy changes to the action plan, increase the size of a voluntary program, or revise the FSS action plan as needed to comply with changes in HUD regulations. The PHA must submit any changes to the action plan to HUD for approval.

PHA Policy

The PHA will review and update the action plan at least once a year, and more often if needed, to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

1-II.D. CONTENTS OF THE PLAN [24CFR 984.201(d)]

HUD regulations state that there are several components that must be included in the FSS action plan. At a minimum, the action plan must cover the policies and procedures of the PHA for operation of a local FSS program as follows:

- Family demographics, including a description of the number, size, characteristics, and other demographics such as racial and ethnic data, in addition to the supportive service needs of the families expected to participate in the program. (Chapter 1)
- Estimate of participating families, which means the number of families which can reasonably be expected to receive supportive services under the FSS program. (Chapter 2)
- Eligible families from any other local self-sufficiency program who are expected to agree to executing an FSS contract of participation. (Chapter 2)
- A statement of the PHA's FSS family selection procedures, including a description of how the procedures ensure that families are selected without regard to race, color, religion, disability, sex, familial status, or national origin. (Chapter 4)
- A description of the incentives that the PHA intends to offer to families to encourage participation in the FSS program (an incentives plan), including the establishment of the escrow account. (Chapter 4)
- Outreach efforts, which include a description of the PHA's efforts to recruit eligible families, the actions the PHA will take to ensure that both minority and nonminority groups are informed about the FSS program, and how the PHA will make this information known. (Chapter 4)
- A description of the FSS activities and supportive services to be provided by both public and private resources to FSS families, and identification of these public and private resources. (Chapter 4)
- A description of the PHA's method for identifying family support needs, including how the PHA will identify the needs and deliver the services. (Chapter 4)
- A description of the PHA's policies regarding program termination or withholding of services based on a family's failure to comply with the FSS contract, and available grievance procedures. (Chapter 5)
- Assurances of noninterference with rights of non-participating families which state that a family's election to not participate in the FSS program will not affect the family's admission to the Section 8 or public housing program, nor will it affect their right to occupancy in accordance with its lease. (Chapter 4)
- A timetable for implementation of the FSS program, including the schedule for filling FSS slots with eligible FSS families. (Chapter 2)

- A certification that development of the services and activities under the FSS program has been coordinated with programs under Title I of the Workforce Innovation and Opportunity Act, other relevant employment, childcare, transportation, training, education, and financial empowerment programs in the area, and will continue to be coordinated to avoid duplication of services and activities.

Optional Additional Information [24 CFR 984.201(d)(13)].

- HUD encourages additional information in the action plan that would help to determine the soundness of the PHAs proposed FSS program.

PHA Policy

The PHA will submit additional optional information in this action plan that will help HUD determine the soundness of the proposed FSS program.

This information includes:

Policies related to the modification of goals in the ITSP. (Chapter 5)

Policies on the circumstances in which an extension of the contract of participation may be granted. (Chapter 5)

Policies on the interim disbursement of escrow, including any limitations on the use of the funds. (Chapter 6)

Policies regarding eligible uses of forfeited escrow funds by families in good standing. (Chapter 6)

Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating. (Chapter 4)

Policies on requirements for documentation for goal completion. (Chapter 4)

Policies on documentation of the household's designation of the "head of FSS family." (Chapter 4)

Policies for providing an FSS selection preference for porting families if the PHA elects to offer such a preference. (Chapter 7)

1-II.E. FAMILY DEMOGRAPHICS [24 CFR 984.201(d)(1)]

As part of the required contents of the FSS action plan, family demographics of the Section 8 and public housing program participants serve to provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants). These data may later be used to help the housing authority and the program coordinating committee (PCC) to identify supportive service needs of the families expected to participate in the FSS program.

PHA Policy

Section 8 and Public Housing	Total Families	Percent of Total
All Families	2505	100%
Single	1168	47%
Female HOH	1885	75%
Male HOH	620	25%
Race		
White	2227	89%
Black/African American	205	8%
American Indian/Alaska Native	99	4%
Asian	34	1%
Native Hawaiian/Other Pacific Islander	19	1%
Ethnicity		
Hispanic or Latino	206	8%
Not Hispanic or Latino	2299	92%
Income		
Extremely Low-Income	2121	85%
Very Low-Income	298	12%
Low-Income	67	3%
HOH Income from Wages	581	23%
Other Member Income from Wages	243	10%
HOH Income from TANF	235	9%
Other Member Income from TANF	23	1%
HOH Income from SSI	1313	52%
Other Member Income from SSI	178	7%

Number of Children		
0	461	18%
1-2	381	15%
3-4	123	5%
5 or more	22	1%
Total Number of Family Members		
1-2	1767	71%
3-4	511	20%
5 or more	227	9%
Persons with Disabilities		
HOH Person w/ Disabilities (HUD)	1349	54%
Family Members w/ Disabilities	240	10%

Chapter 2

PURPOSE, SCOPE, AND APPLICABILITY OF THE FAMILY SELF-SUFFICIENCY PROGRAM

INTRODUCTION

This chapter contains information about the FSS program's purpose, size, and measurable objectives as well as information on program operation. This includes potential participant demographics, the program timetable, the number of families to be served, and the size of the PHA's voluntary FSS program. This chapter also contains definitions of the key terms in this FSS action plan.

Part I: The Purpose and Basic Requirements of the FSS program: This part includes a description of the purpose of the FSS program on a national level—its intent, goal, and major strategies.

Part II: The Scope of the FSS program: This part contains information about housing assistance programs eligible to participate in FSS, the size of the PHA's FSS program, an estimate of participating families, eligible families from other self-sufficiency programs, and eligibility for combined FSS programs.

Part III: Program Operation: This part specifies the requirements for FSS program operation, including voluntary FSS program implementation.

Part IV: The Definitions of Terms Used in the PHA's FSS program: This section contains both HUD and PHA definitions for terms used in this policy document.

PART I: PURPOSE AND BASIC REQUIREMENTS OF THE FSS PROGRAM

2-I.A. PURPOSE

The purpose of the family self-sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of Section 8 and public housing assistance programs with public and private resources enabling families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency [984.101(a)(1)].

In addition to this broader national goal of the FSS program, the PHA also establishes a local goal consistent with the PHA's mission statement to serve as a guide for establishing policy and implementing the FSS program.

PHA Policy

The PHA's local goal in operating this FSS program is to match housing-assisted families with a broad range of highly collaborative existing community services to assist FSS families in achieving economic self-sufficiency. *Economic self-sufficiency* is defined as having the sustainable skills necessary to maintain employment paying a "living wage." This wage would pay for the family's basic needs without the use of government subsidies.

2-I.B. PROGRAM OBJECTIVES [24 CFR 984.102]

In order to reach the FSS national program goal, HUD has defined its FSS program objective as to reduce the dependency of low-income families on welfare assistance and on housing subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling, and other forms of social service assistance while living in assisted housing so that they may obtain the education, employment, business and social skills necessary to achieve self-sufficiency. As with the goals of the program, FSS program objectives are defined on the national level through FSS regulation, and on the local level by PHA policy.

PHA Policy

On the local level, the PHA will achieve the national program objective by offering low-income families a broad range of services through partnering with the program coordinating committee (PCC). These services will provide long-term education, job training, counseling, and other forms of social service assistance so that families may achieve economic self-sufficiency, as defined in Section 2-I.A. of this document.

2-I.C. BASIC REQUIREMENTS OF THE FSS PROGRAM [24 CFR 984.104]

An FSS program established under 24 CFR Part 984 must operate in conformity with the regulations and this FSS action plan (as required in 24 CFR 984.201, provide comprehensive supportive services as defined in 24 CFR 984.103, and operate in compliance with nondiscrimination and equal opportunity requirements.

