

Family Self-Sufficiency Action Plan

**Boston Housing Authority
52 Chauncy Street
Boston, MA 02111**

December 2021 Update

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I. Introduction

The Boston Housing Authority (BHA) was established in 1935 and is the largest public housing authority in New England. BHA has maintained a Family Self-Sufficiency (FSS) program since the FSS program inception in the mid 1990's. However, through an innovative partnership with Compass Working Capital ("Compass") established in December 2018, BHA has expanded its Family Self-Sufficiency (FSS) Program to promote employment, savings, and financial security for its residents.

This Action Plan outlines the major components of BHA's existing program and details how BHA manages the program in partnership with the Compass Team. BHA's partnership with Compass through 2021 has served Housing Choice Voucher (HCV) recipients. However, BHA has just begun enrolling Public Housing families through a pilot program at Ruth Barkley Apartments effective 2022. BHA staff will review the Action Plan in coming months to encompass the public housing program.

Partnering Organization: Compass Working Capital

Compass Working Capital ("Compass") is a nonprofit organization that provides savings and financial coaching programs that support families with low incomes to build assets, achieve their financial goals, and become financially secure. Its broader vision is to build a leading, nonprofit financial services organization that promotes economic mobility and financial security for families with low incomes by influencing field-related practice and policy. Compass runs FSS programs on behalf of local housing authorities and housing partners in multiple locations throughout New England.

II. Family Demographics

BHA serves a diverse population in need of access to programs, services, and opportunities that promote economic independence, help families gain and maintain employment, and provide homeownership preparation activities. The FSS program provides services to eligible families who are currently receiving housing assistance through BHA's HCV program, as per HUD guidelines.

Please see attached addendum with specific family demographic information for HCV.

III. Estimate of Participating Families

BHA intends to serve all HCVP families who are interested in participating in the FSS Program. Enrollment in the program will be ongoing, with no cap on enrollment, pending available resources. BHA has enrolled over 1100 new families into FSS since its partnership with Compass was formed at the end of 2018. BHA's goal is to enroll 1500 Leased Housing families and 100 Public Housing families into FSS by the end of 2022.

IV. FSS Family Selection Procedures

A. Voluntary Program – Assurance of Non-Interference

The FSS Program is a voluntary program available to eligible families. Residents who do not wish to participate in the FSS Program, who withdraw from the FSS program, or do not successfully graduate from the FSS program will not lose their housing assistance because of this decision.

B. Statement of Non-Discrimination

Participation in the FSS program shall be open to all eligible residents, as defined below, subject to availability of FSS slots. Determination of eligibility shall be on a uniform, nondiscriminatory basis with respect to race, color, sex, religion, familial status, disability, or national origin.

C. Eligibility Criteria

To be eligible for the FSS program, residents must:

- Be an active participant of HCV BHA housing assistance program
- Be a tenant in good standing, as determined by BHA. (Good standing is defined as not currently under a proposed termination of subsidy process.)
- Be interested in working toward their employment and financial goals.

In addition, eligible residents must attend an orientation before enrolling in the program, either in person, virtually, over the phone, or through a self-paced digital enrollment tool (described in more detail below).

D. Waiting List

There is currently no wait list to join the FSS program. The Compass Team seeks to serve all interested households within the team's capacity based on available resources. In the event a waiting list needs to be created, participants will be chosen for participation based on the following factors, in order from most to least preferable.

D.1. Preferences Overview

- Preference will be given to FSS participants porting to BHA from another housing authority.
- Preference will be given to applicants who have not previously participated in FSS.
- First come, first served.

This document describes BHA's policies and procedures for the Family Self-Sufficiency program. In the event of a conflict between this document and BHA's Housing Choice Administrative Plan, the applicable provisions of the Administrative Plan shall take precedence.

V. FSS Activities and Supportive Services

A. Outreach & Recruitment

Drawing on a successful outreach campaigns utilized in Compass's current programs, the Compass Team will conduct recruitment activities in coordination with BHA based on BHA priorities and enrollment targets. Grounded in the core belief that families want to work and get ahead, these FSS marketing materials tap into and build upon families' deeply held aspirations for themselves and for their children. In these materials, FSS will be framed as an opportunity to pursue dreams and goals, such as owning a home, obtaining a college degree, starting a business, saving for children's education, or becoming debt-free.

In response to Covid-19, which has pushed much of our engagement efforts into a remote environment, and in an effort to reduce barriers to enrollment, Compass has implemented a remote enrollment portal. Interested residents are directed to this portal where the program is explained in more detail. Compass staff are also available over the phone, through Zoom, and in person (subject to public health protocols) to assist any interested household who has difficulty completing the enrollment process online.

If interested in enrolling, participants will be able to sign their Contract of Participation (COP) and Individual Training and Services Plan (ITSP) in the form prescribed by HUD. The COP established the principal terms and conditions governing participation in the FSS program. The ITSP enumerates the participant's goals in the FSS program, which they self-identify in a survey prior to enrollment, as well as other goals required by HUD.

After completing the enrollment documents, participants then sign up for their first appointment with their Compass Financial Coach.

Interested residents will be directed to attend a program orientation (either remotely or in-person), where the program is explained in more detail. Coaching/counseling staff will also be available on an appointment basis to assist any interested resident who has difficulty completing the FSS program application process.

B. Financial Coaching/Counseling

The initial enrollment meeting also marks the beginning of the financial coaching/counseling component of the FSS program, which is the hallmark of the Compass FSS model. At this meeting, the Compass Team works with clients to create a comprehensive financial profile, including educational and employment background, credit and debt analysis, current financial practices, savings goals, and perceived obstacles to achieving their goals. Throughout the program, the Compass Team continues to provide ongoing, customized financial coaching/counseling for all FSS clients to help them reach benchmark targets in five core areas: (1) income and employment; (2) credit and debt; (3) savings; (4) utilization of high quality financial services; and (5) asset development. Moreover, Compass Team members focus on helping FSS clients optimize escrow funds toward financial security and asset development goals, including post-secondary education, small business development, homeownership, and credit improvement.

C. Community Partnerships

BHA and the Compass Team have established strategic partnerships with organizations that specialize in providing career development programs, small business training, social services, basic financial products like checking and savings accounts, grant and loan products for first-time homebuyers. BHA and the Compass Team will work with FSS clients to identify, access, and optimize these resources.

Examples of existing partnerships include (but are not limited to) the following:

- **Public Benefits** - The state and local offices of the Department of Transitional Assistance (DTA) assist with applications for Transitional Aid to Families with Dependent Children (TAFDC) and the Supplemental Nutrition Assistance Program (SNAP).
- **Child Care** - Child Care Choices of Boston help Boston families find, select and pay for child care.
- **Education** – X-Cel is a non-profit organization that helps adults obtain their Hi-Set (formally known as GED) degrees. For post-secondary educational needs, American Student Assistance College Planning Center (formerly TERI) helps local students build a plan to pay for their post-secondary education and apply for scholarships. Additionally, Bunker Hill and Roxbury Community Colleges are community colleges in the Boston area that offer affordable degree options in addition to some job trainings.
- **Small Business Development** – Accion is a national, nonprofit lender that aims to serve businesses with limited access to bank financing. With over twenty years of lending experience serving diverse communities and industries, Accion provides the needed funding to business that wish to start and grow. SCORE is a

nonprofit association dedicated to helping small businesses get off the ground. They provide access to free, confidential business mentoring (in person or via email) from volunteer mentors who share their expertise across 62 industries. Center for Women and Enterprise (CWE) is a nonprofit organization that provides tools and support for people, both men and women, who want to start or grow their own business. They are focused on helping women increase their professional success, personal growth, and financial independence.

- **Workforce Development** – Boston has many One-Stop Career Centers that help people prepare, apply, and obtain jobs. Additionally, Jewish Vocational Services (JVS) Boston is one of the largest workforce development organizations in New England. JVS’s mission is to empower individuals from diverse communities to find employment and build careers, while partnering with employers to hire, develop, and retain productive workforces. Action for Boston Community Development (ABCD) is a nonprofit human services organization that each year provides more than 100,000 low-income residents in the Greater Boston region with the tools and resources needed to transition from poverty to stability and from stability to success. In addition, there are various vocational and trades programs that are important for Section 3 resident employment opportunities, such as in the building trades (Youthbuild, Building Pathways, Benjamin Franklin Institute of Technology, etc., BHA also has collaborations with trades and various developers that it is in partnership with that assist residents find employment.
- **Homeownership Counseling** – Boston Home Center – Department of Neighborhood Development has been a strong partner is offering first time home buyer educational workshops and counseling.
- **Homeownership Grants** – The City of Boston offers a grant to First-Time Home Buyers who meet eligibility requirements.
- **Affordable Housing Developers** - Habitat for Humanity provides decent affordable homeownership for families in our community.

VI. Incentives to Encourage Participation

BHA will administer, maintain, and oversee escrow accounts, in accordance with PIH regulations at 24CFR Part 984, for all FSS clients.

BHA will upon receipt then deposit the FSS account funds of all participating families into a single depository account. BHA deposit the FSS account funds of all participating families into a single depository of the HUD-approved investments and will account the total of the combined FSS account funds in its accounting records. During the term of the

contract of participation, BHA will credit periodically, but not less than annually, to each family's FSS account, the amount of the FSS credit. The investment income for funds in the FSS account will be pro-rated and credited to each family's FSS account based on the balance in each family's FSS account at the period for which the investment income is credited.

BHA will keep the following records for families:

- Balance at the beginning of reporting period
- Amount credited during period
- Any deductions made from account for amounts due to BHA before interest was distributed
- The amount of interest earned on the account
- The total in the account at the end of the reporting period

BHA and the Compass Team will update FSS clients at least semi-annually of the status of their escrow account.

VII. Method for Identification of Family Support Needs

The Compass Team administers a qualitative survey to all FSS clients on an annual basis. This survey is administered at baseline and annually to track clients' financial practices and to measure qualitative changes in participants' confidence, sense of well-being, and barriers to success. This survey will also help identify any modifications to the family's goals during their participation in the program. This information will also help to frame successes and challenges of the FSS program into these additional areas.

VIII. Program Termination and Available Grievance Procedures

A. Program Termination

The goal is to graduate 75% of FSS clients from the program. At every stage in the program, we work with clients to address the challenges and barriers that might inhibit their participation and success in the program.

Termination, which results in the loss of accumulated escrow funds, is a decision made by BHA and the Compass Team for a defined set of reasons. Specifically, a client is at risk for termination if s/he:

1. Does not meet with the Compass Team as outlined in the *Compass Appointment Policy*, which states that participants are at risk of termination if they do not complete an appointment in over a year or within the first 90 days of enrollment.
2. Does not comply with the Contract of Participation or completes the Individual

- Training and Services Plan as required by HUD.
3. Moves out of BHA subsidized housing without fulfilling the graduation requirements.
 4. Does not comply with tenant responsibilities as outlined by BHA (e.g. reporting any income or household changes, maintaining lease compliance).
 5. Is terminated from BHA housing in accordance with BHA and HUD requirements.

Termination from the FSS Program will not result in a termination of housing assistance from BHA. Prior to terminating a participant from the FSS program, the Compass Team must review the situation with BHA program representatives. Upon termination, the reason for termination is documented in the participant's file, and the Compass Team will notify BHA according to protocol.

B. Grievance Procedures

If an FSS participant is at risk of termination from the FSS program, as outlined in the section above, the FSS Coordinator will schedule a conference with the participant to discuss the violation(s). At the conference, the Coordinator will attempt to resolve the matter by obtaining an understanding of why the Family is not in compliance and determine if adjustments to goals, services, and/or the timetables are necessary and/or appropriate in an effort to help the Family complete their FSS Contract. The Family will be advised that the FSS Contract can be terminated and any escrow funds will be forfeited upon further violations of the FSS Contract. In most cases, problems are resolved at this step. However, if the FSS Coordinator is unable to reach a satisfactory resolution with the Family, additional administrative action may be necessary.

If additional violations of the FSS Contract occur, or the conference does not successfully resolve the matter, the BHA will propose termination of the FSS Contract. A letter proposing termination will be sent to the tenant via regular and Certified Mail. The letter will state the reason(s) for the proposed termination and inform the Participant that (s)he has the right to request an appeal if there is disagreement regarding the termination. The Participant will be advised to put the request for an appeal into writing within twenty (20) days to the BHA.

At the appeal, the Family may state its objection to termination of its FSS Contract. At any point prior to FSS termination, the BHA may seek to work with the family to modify its goals to restore compliance.

At the conclusion of the appeal, BHA will issue a decision regarding the family's continued participation in the FSS program. If the decision is to terminate, the Family will receive a 30-day notice of this action and will forfeit all funds in its escrow account.

The BHA will not terminate HCVP assistance because of the Family's failure to meet FSS responsibilities (see PIH notice 95-5). A family may choose to withdraw from the FSS

program, or may be terminated from the FSS program without jeopardizing their HVCP assistance. Section 8 assistance will be only terminated as provided by HUD and the BHA in the manner applied to all Section 8 subsidy holders. (BHA Administrative Plan Section 14.3.7)

IX. BHA Certification

Boston Housing Authority certifies that the development of services and activities under the Family Self-Sufficiency Program have been coordinated with the Boston Workforce Investment Act, the Department of Transitional Assistance, and any other relevant employment, child care, transportation, training, and educational programs in Boston. Implementation will continue to be coordinated, in order to avoid duplication of services and activities.

X. Other Additional Information

A. Interim Disbursements from FSS Escrow Account

Participants are eligible to take interim withdrawals from their escrow accounts to help them make progress toward their financial goals, according to the following guidelines:

- Funds can only be used to further a participants' progress towards their goals as outlined in the ITSP.
- Policies have been created for common interim FSS withdrawal requests related to: career and education, homeownership, small business development, debt repayment, credit building, and affordable transportation.¹

B. Graduation and Final Withdrawals from FSS Escrow Account

In order to graduate from the FSS program and receive a final disbursement of escrow funds, participants must meet the following requirements:

- Participant completed all obligations under the *COP* and the goals outlined on the *ITSP*.
- Participant actively participated in financial coaching and was not in violation of the *Compass Appointment Policy*.
- Participant provided written self-certification that no member of the household has received cash welfare assistance (TAFDC) for at least twelve consecutive months prior to the contract expiration date.
- Participant (head of household) is working.
- Tenant is in good standing.

¹ These can be furnished upon request.

Residents participating in the FSS Program may enroll again following graduation or completion of the program provided there is no current wait list for the program. In such an instance, they would be added to the bottom of the wait list.

C. Right to Include Addenda

BHA's FSS program reserves the right to include addenda to this Action Plan as situations, regulations, and funding sources change, but such changes will be made in compliance with HUD regulations.

*** BHA Demographic Information**

Grand Total All Members	36,302
Grand Total Head Of Household	15,466
Grand Total Children	14,010
Grand Total Family With Children	7,392

Totals of HOH/Members	Race	Non-Hispanic	Hispanic	Totals
All	Caucasian	4,663	10,802	15,465
Head Of Household	Caucasian	2,751	4,275	7,026
All	Black or African-American	16,543	3,091	19,637
Head Of Household	Black or African-American	6,841	1037	7,876
All	American Indian/Alaska Native	105	60	165
Head Of Household	American Indian/Alaska Native	60	25	85
All	Asian	752	8	760
Head Of Household	Asian	328	1	329
All	Native Hawaiian or Pacific Islander	226	49	275
Head Of Household	Native Hawaiian or Pacific Islander	126	23	149

* HOH with HCVP increments(include PBV and outgoing)

<u>Employment Statistics</u>	<u>HCV</u>
Participants Employed	4,527

<u>Average Annual Income</u>	<u>HCV</u>
13,853 Residents	\$10,471