

**VERMONT STATE HOUSING AUTHORITY**  
**FSS ACTION PLAN**  
**FOR THE FAMILY SELF-SUFFICIENCY PROGRAM**

**Revised June 2018**

draft

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# **THE FAMILY SELF-SUFFICIENCY PROGRAM AND THE FSS ACTION PLAN OF THE VERMONT STATE HOUSING AUTHORITY**

## **INTRODUCTION**

The Vermont State Housing Authority (VSHA) has been providing critical housing assistance in Vermont for 50 years. Established in 1968, VSHA has the distinction of being the first statewide housing authority in the nation.

Throughout our history, we have aggressively and compassionately pursued opportunities to provide and make housing more accessible and affordable for Vermonters. Today, we serve more than 4100 families and are active in almost every community within the state.

## **MISSION**

The Vermont State Housing Authority's Mission is to promote and expand the supply of affordable rental and homeownership opportunities on a statewide basis. Each new endeavor will enhance or increase the organization's capacity to continue its mission and to assure the effectiveness of VSHA as a provider and administrator of affordable housing programs.

## **HISTORY OF THE FSS PROGRAM AT VSHA**

The Family-Self Sufficiency (FSS) program began as two pilot projects, Project Self-Sufficiency, created in 1986, and Operation Bootstrap, created in 1990. These pilot projects tested out self-sufficiency programs for families who received housing subsidies and included a focus on essential services, education and training. The FSS program was created under the National Affordable Housing Act in 1990 and built upon what was learned from the initial pilot projects.

VSHA is revising its FSS Action Plan in order to reflect the needs and goals of a more mature and active program. VSHA currently administers the Family Self-Sufficiency Program throughout the entire state of Vermont. VSHA is rebranding the name of the program to be Forward Motion: A Family Self-Sufficiency Program. For the purpose of this Action Plan the program will be referred to as FSS.

The Vermont State Housing Authority began its FSS program in 1991. The FSS program began as a mandated program. Upon completion of the requirements for the Mandatory Minimum Program Size, the FSS program of VSHA transitioned to a voluntary program. VSHA absorbed the FSS program of the Hartford Housing Authority, which took place in late 2010.

## **PROGRAM OBJECTIVE**

The objective of FSS, as defined by the U.S. Department of Housing and Urban Development (HUD), is to reduce the dependency of low-income families on welfare assistance and Section 8, public, or any federal, state or local rent or homeownership subsidies.

The FSS program seeks to help participants make measurable progress toward economic security and become better able to achieve the goals they set out for themselves and plan for the future. Families are provided with opportunities for education, training, and supportive services.

## **THE FSS ACTION PLAN**

HUD requires that each Public Housing Authority (PHA) with an FSS program have an Action Plan. This Action Plan lays out the PHA's policies for program operation and is available for public review per 24 CFR Part 903. The Action Plan defines policies for program operations. All FSS policies and functions and responsibilities of FSS staff members must be in compliance with HUD regulations. The Action Plan allows for development of PHA discretionary policies in areas where the PHA has discretion.

The revision of an Action Plan occurs when a PHA proposes to make policy changes to the Action Plan, increases the size of a voluntary program, or revises the FSS Action Plan to comply with changes in HUD regulation. For state and regional PHAs, the plan is developed in consultation with the chief executive officer (Governor). The PHA works in conjunction with the Program Coordinating Committee for consultation regarding the Action Plan. Revised FSS Action Plans must be included in the PHAs Annual Plan. Any changes must be submitted to HUD for approval.

An FSS Action Plan must contain the following:

- Family demographics
- Estimate of participating families (program size/number of FSS slots)
- Outreach efforts
- Incentives to encourage participation
- FSS activities and supportive services
- Method for identification of family support needs
- FSS Family Selection Procedures
- Assurances of non-interference with the rights of non-participating families
- Timetable for program implementation
- Certification of coordination
- Optional additional information

## FAMILY DEMOGRAPHICS

A required section of an FSS Action Plan includes family demographics within the housing authority. This data may inform VSHA and the Program Coordinating Committee to assist with the identification of supportive service needs of FSS program participants.

	Tenant Based Voucher		Project Based Voucher		Homeownership Voucher	
	Total Families	Percent of Total	Total Families	Percent of Total	Total Families	Percent of Total
<b>All Families</b>	2,798	100%	727	100%	71	100%
Single		49%		59%		35%
Female HOH		76%		67%		76%
Male HOH		24%		33%		24%
<b>Race</b>						
White		96%		97%		99%
Black/African American		2%		1%		0%
American Indian/Alaska Native		1%		1%		1%
Asian		0%		1%		0%
Native Hawaiian/Other Pacific Islander		1%		0%		0%
<b>Ethnicity</b>						
Hispanic or Latino		2%		2%		1%
Not Hispanic or Latino		98%		98%		99%
<b>Income</b>						
Average Family Income	\$14,041		\$15,588		\$21,162	
Extremely Low-Income		73% <sup>2</sup>		64% <sup>3</sup>		50% <sup>4</sup>
Very Low-Income		26% <sup>2</sup>		34% <sup>3</sup>		39% <sup>4</sup>
Low Income		1% <sup>2</sup>		2% <sup>3</sup>		11% <sup>4</sup>
Families with Wage Income		25% <sup>5</sup>		26% <sup>5</sup>		39% <sup>5</sup>
Families with TANF Income		14% <sup>5</sup>		10% <sup>5</sup>		4% <sup>5</sup>
Families with SSI/SS/Pension		51% <sup>5</sup>		63% <sup>5</sup>		60% <sup>5</sup>
Families with Any Other Income		3% <sup>5</sup>		3% <sup>5</sup>		4% <sup>5</sup>

Families with No Income		9% <sup>5</sup>		8% <sup>5</sup>		10% <sup>5</sup>
<b>Number of Children</b>						
Household without children		29%		67%		61%
1-2		4%		27%		32%
3-4		1%		6%		7%
5 or more		0%		0%		0%
<b>Total Number of Family Members</b>	5,633		1,237		153	
1-2		73%		81%		69%
3-4		21%		15%		26%
5 or more		5%		3%		4%
<b>Persons with Disabilities</b>						
HOH Person with Disabilities		58%		46%		71%
Family Members with Disabilities <sup>1</sup>		36%		30%		45%
<sup>1</sup> Includes HOH. <sup>2</sup> Based on 1,671 HCV Households. <sup>3</sup> Based on 663 PB Households. <sup>4</sup> Based on 28 Homeownership Households.						<b>As of 4/30/18</b>
<sup>5</sup> Families may be in more than one category.						

FSS will be made available to families who are participating in VSHA’s Section 8 Housing Choice Voucher program. This will include the Project-Based program.

VSHA’s mandatory minimum program size as of October 21, 1998 was 165. Additionally, the mandatory minimum of the program previously administered by the Hartford Housing Authority was 4—for a combined total original mandatory minimum of 169.

At this point in time, 207 participants have successfully completed VSHA’s FSS program since October 21, 1998. The FSS program of VSHA now functions as a voluntary program. It is VSHA’s practice and ongoing intent to maintain enrollment at between 150 to 200 participants. Hence, the estimate of participating families is 175.

VSHA will offer FSS in all counties. We reserve the right to enroll greater numbers of participants in those counties where there are more services available to meet the needs of FSS participants.

## OUTREACH EFFORTS

VSHA has provided FSS information to all eligible families participating in our applicable Section 8 programs. Participants who receive a new Section 8 Housing Choice Voucher receive information about the FSS program during their voucher briefing. Information about the FSS program will be disseminated at annual inspections and when a family moves from one unit to another and at annual reexaminations.

VSHA will continue to promote the FSS Program through mailings, posters, informational meetings, periodic mailings, and advertising as necessary.

Case managers will also meet periodically with service providers throughout the state to explain the program and solicit applications as needed.

Outreach materials may include program information, benefits, and participant responsibilities.

Outreach will include but is not limited to the following:

- 1) Families residing in Project-Based service-enriched housing
- 2) Families participating in the Family Unification Program (FUP) and/or receiving a Housing Choice Voucher as a result of the Vermont Rental Subsidy program or the Transitional Housing Program
- 3) Families participating in Reach-up or other similar program through Voc Rehab or the Department of Labor
- 4) Families porting to VSHA's jurisdiction

VSHA has an active and engaged Program Coordinating Committee, consisting of representatives from the Agency of Human Services, Economic Services, The Vermont Student Assistance Corporation, Adult Basic Education, NeighborWorks Homeownership Centers, United Way, the Department of Labor and VocRehab, Head Start, Youth Service Bureaus, and other active members of the social service community. We also strive to have consistent representation on the committee from at least one FSS participant.

As a result of the efforts of the Program Coordinating Committee's work to identify and address barriers, the FSS program now outreaches to participants in our Veterans Assisted Supportive Housing Program as well as Family Unification Program participants. Additionally, through participation in the Program Coordinating Committee, we have received commitments for partnership through Head Start and the Parent Child Centers—both high performing early childhood education providers.

Further, VSHA partners with a local PHA in the administration of the PCC. The committee is engaged in the coordination of services for participants on an individual level, bringing together information and resources to further the program's objectives. The committee meets formally a minimum of four times a year, with frequent contact with committee members informally

throughout the year. On an annual basis and in conjunction with the yearly review of the Annual Plan, the committee reviews the policies and procedures outlined in the FSS Action Plan along with PCC membership and outreach activities. Additionally, the committee may conduct an annual programmatic needs assessment, in partnership with staff, to assist in annual priority and goal setting for the program.

## **FAMILY SELECTION PROCEDURES**

Selection for participation and outreach efforts will be equally targeted to minority and non-minority families without regard to disability. Selection procedures will ensure that the families will be selected without regard to race, color, creed or religion, sex, sexual orientation, gender identity, disability, HIV status, familial status, marital status, ancestry or place of birth, age, or US Military Veteran status. Upon request, FSS staff will provide a reasonable accommodation to persons with disabilities.

Families who have previously participated in the FSS Program and who graduated will not be permitted to re-enroll. VSHA, at its discretion, may deny participation in the FSS program to a family that previously participated and was terminated from FSS because the family did not meet the obligations of the Contract of Participation. VSHA, at its discretion, may allow a participant who was previously terminated from the program to re-enroll in the program.

If enrollment exceeds 175 participants, VSHA may exercise its right to keep a wait list.

If there are more applicants to the FSS Program than the program can serve, a wait list will be created. In general, applicants will be ranked according to the date and time that they complete an application to the FSS Program. However, preference will be given to the following applicants, in the following order of priority:

1. Families residing in Project-Based service-enriched housing
2. Families participating in the Family Unification Program
3. Families participating in Reach-up or other similar programs
4. Families porting to VSHA's jurisdiction

When a slot becomes available, families will be contacted from the waiting list. In areas where the level of interest permits, VSHA may opt to offer group orientation sessions. At the end of the orientation session, individual enrollments will be scheduled. If the person on the waiting list does not respond, or does not attend a required orientation session or enrollment appointment without good reason, they may be removed from the waiting list and offered access to the grievance process.

A full intake will be conducted at enrollment by the FSS coordinator at one of the following locations:

- VSHA
- a local social service agency



- at the home of the participant
- other mutually agreed upon location

VSHA may screen families for interest and motivation to participate in the FSS program provided that the factors utilized are those which solely measure the family's interest and motivation to participate in the FSS program. For this reason, PHAs must only apply motivational screening factors that are permissible under the regulations.

VSHA will screen families for interest and motivation to participate in the FSS program by requiring candidates to participate in an FSS program orientation. The orientation will include a review of participant expectations, the objectives of the programs, services offered, and the requirements to complete the FSS program.

At the time of enrollment, the FSS coordinator, the applicant, and if applicable the applicant's other service provider(s), will meet to discuss the family's objectives and the support services necessary to achieve those objectives. A Contract of Participation between the family and VSHA will be developed and executed.

## **INCENTIVES TO ENCOURAGE PARTICIPATION**

VSHA will offer enrolled families the following incentive to encourage participation in the FSS Program:

- (a) FSS Escrow Account
- (b) Supportive Services

### **The Escrow Account**

VSHA will establish an FSS escrow account for participating families in accordance with HUD guidelines as a financial incentive for program participation. While a family is a participant in the FSS Program, the portion of the increase in that family's rent that is attributable to earned income will be credited to the FSS escrow account in accordance with HUD procedures and requirements.

Escrow deposits will be calculated when an interim or annual reexamination is conducted. Escrow will be held in an interest bearing account, and a statement will be provided to the family on an annual basis. This statement will reflect the balance, deposits, withdrawals, and any accrued interest.

Upon successful completion of the Contract and Individual Training and Service plan (ITSP), the participant may request graduation in writing and potentially receive any monies held in his or her escrow account.

### **FSS Activities and Supportive Services**

In addition to the escrow account, and with the goal of eliminating barriers to employment, FSS staff members will provide referrals to needed services for FSS participants. Staff will also work as partners with other organizations and case managers so that FSS participants can work to reach the goals established on the ITSP plan. FSS staff members will work as advocates and coaches for participants and will conduct intakes at each update meeting so that barriers and progress can be assessed.

FSS staff will work with partners on the PCC Committee as well as other social service providers based on the individual needs of a participant and the ITSP. Support services that the FSS staff member will assist the participant to access include but are not limited to:

<b>NEED</b>	<b>Support Services</b>
Health Services	<ul style="list-style-type: none"> <li>• Health Clinics</li> <li>• Dental Clinics</li> <li>• Mental Health Providers</li> <li>• Health Insurance Options and Assistance</li> <li>• Substance Abuse Counseling</li> </ul>
Daycare and Supportive Child Services	<ul style="list-style-type: none"> <li>• Daycare Options</li> <li>• Head Start Options</li> <li>• Parenting Education</li> <li>• Child/Family Services</li> <li>• WIC</li> <li>• Health Services</li> </ul>
Educational Programs	<ul style="list-style-type: none"> <li>• Educational Program Options</li> <li>• Financial Aid</li> <li>• Basic and Higher Education</li> <li>• Scholarship Opportunities</li> </ul>
Training Programs	<ul style="list-style-type: none"> <li>• VocRehab Services</li> <li>• Career Training Centers</li> <li>• Sponsored Training Programs</li> </ul>
Job Search Assistance	<ul style="list-style-type: none"> <li>• Job Seeker Services</li> <li>• Resume Writing and Interviewing Workshops</li> <li>• Transportation Support</li> <li>• Work Clothing Support</li> <li>• Job Site Visits</li> </ul>
Nutritional Assistance	<ul style="list-style-type: none"> <li>• WIC</li> <li>• Food Stamps</li> <li>• Food Banks</li> </ul>
Financial and Credit Counseling	<ul style="list-style-type: none"> <li>• Financial Education</li> <li>• Small Business Counseling and Education</li> </ul>
Homeownership Counseling	<ul style="list-style-type: none"> <li>• Neighborworks Homeownership Centers</li> <li>• VSHA's Homeownership Program</li> </ul>
Crisis Assistance	<ul style="list-style-type: none"> <li>• Heating and Electric Assistance</li> <li>• Legal Aid Options</li> </ul>

## **METHOD FOR IDENTIFICATION OF SUPPORTIVE NEEDS**

The following process will be used to determine the supportive services needed by a participant:

Intake and assessment will be conducted by the FSS coordinator in conjunction with the participant. If the applicant already receives services or case management through another service provider, the case manager and applicant may make this assessment with the assistance of the participant's current case manager with the goal of service coordination and elimination of duplication of services. The initial intake information will be added as an appendices to the ITSP.

In cases where the client already has a self-sufficiency related case management plan in place with another provider, his or her plan (for instance, the Family Development Plan that has been executed with Reach-Up) may be incorporated into the FSS Contract of Participation. The FSS coordinator would then keep copies of the client's updated Family Development Plan in the FSS file. It is the intent of VSHA to not duplicate services that are readily available to some participants.

For those clients who do not already have access to case management services, or who have already completed these programs, the FSS coordinator will link participants to local agencies that currently provide case management services, as needed, and supportive services as needs are identified.

## **ASSURANCES OF NON-INTERFERENCE WITH THE RIGHTS OF NON-PARTICIPATING FAMILIES**

A family's election to not participate in the FSS Program will not affect the family's right to occupy in accordance with its lease. FSS participation is voluntary and VSHA will not penalize a Section 8 voucher holder who chooses to not participate or is terminated from the FSS program.

## **TIMETABLE FOR PROGRAM IMPLEMENTATION**

The Family Self-Sufficiency program through VSHA is already functioning. Outreach and enrollment continues. Program participants are currently engaged in accessing supportive services. The FSS Action Plan has been revised to reflect a more mature program and revisions have been made according to HUD requirements.

## **CERTIFICATION OF COORDINATION**

VSHA certifies that coordination with services is currently occurring and will continue to be developed in conjunction with local, state, and federal agencies as applicable in the local communities of the participants who are served. These services include but are not limited to the areas of training, education, employment, child care, transportation, health and mental health

services, and nutritional and economic services. Implementation will continue to be coordinated in conjunction with other providers and case managers to avoid duplication of services and activities.

## **PROGRAM COMPONENTS**

This section discusses three main components of the Family Self-Sufficiency Plan:

- The Contract of Participation (COP)
- The Individual Training and Services Plan (ITSP)
- The Escrow Account

### **Contract of Participation**

The Contract of Participation (COP) is an agreement entered into by the participating head of the household and VSHA. This contract establishes the rights and responsibilities of the FSS family and VSHA. A family must comply with the obligations, terms, and conditions as set forth in the contract.

The Individual Training and Service Plan (ITSP) is attached to the COP. This document further addresses the specific goals and action steps that the FSS participant will complete so that the contract of participation can be fulfilled.

### ***Contract Completion***

A contract is considered completed and participation of the FSS family will be concluded when:

- A family has fulfilled all of its obligations under the contract of participation on or before the expiration of the contract term, including any extension thereof.

Or

- 30 percent of the monthly adjusted income of the FSS family equals or exceeds the published Fair Market Rent for the unit in which the family is eligible based on the PHA's occupancy standards. The contract of participation and the family's participation will be concluded even if the ITSP has not been completed as long as no family member receives welfare cash assistance when this condition is satisfied.

### ***Requests for Extensions***

The term of the COP is five years. However, a contract may be extended for up to two additional years for "good cause," or circumstances beyond the control of the FSS family. To be considered for an extension, the request should be made in writing by the participant and explain the need for an extension. The PHA will determine good cause on a case-by-case basis, and will notify a family in writing of a decision. If granted, the extension of the contract will allow the FSS participant to continue to build escrow.

### ***Termination of the FSS Contract***

The contract of participation may be terminated before the expiration of the contract term and any applicable extension under these circumstances:

- Failure to comply with contract requirements and failure to meet the obligations of the COP including lease violations
- Mutual consent of the participant and PHA
- Voluntary withdrawal of the participant
- Unavailability of Supportive Services

If the FSS participant fails to comply with the terms of the FSS Contract of Participation, or in the event that supportive services are not available, the family may be sent a notice advising them that their FSS Contract will be terminated. The notice will give them the right to an informal hearing. In the event that the FSS Contract is terminated, the escrow account will revert back to the PHA.

### ***Grievance Procedures***

In the event of an adverse action by the PHA, an FSS family may request an informal hearing. The procedures for grievances and informal hearings for FSS families will be the same as the procedures set forth and adopted in the Administrative Plan of VSHA.

### ***Individual Training and Service Plan***

In conjunction with the Contract of Participation, the Individual Training and Services Plan (ITSP) establishes the specific goals of the participating family. These interim and final goals will differ depending upon the individual needs of the participant, and the family will work in conjunction with VSHA to establish and work towards the goals of the ITSP.

### ***Components of the ITSP***

The ITSP contains two main goals. These include:

- That the family be free from welfare cash assistance for at least twelve consecutive months before the expiration of the contract or prior to requesting graduation from the program.
- That the family seek and maintain suitable employment of at least 32 hours per week.

The PHA will determine suitable employment based upon the participant's skills, education, training, and available job opportunities. In the event that a disabled participant is unable to meet the 32 hour per week employment threshold, he or she may request a reasonable accommodation to this requirement.

Aside from the two main goals listed above, the ITSP will contain the other goals of the FSS participant along with the action steps to achieve those goals. These goals may include but are not limited to education, training, credit repair, financial counseling, transportation, and other goals that support the achievement of greater economic independence.

VSHA will assist participants in obtaining services and support so that they can achieve their goals. VSHA will continue to partner with other agencies and make referrals to organizations so that participants can access supportive services.

### ***Revisions to the ITSP***

If a participant wishes to make changes to existing goals other than the two main goals listed above, the participant should work with VSHA to discuss and revise the plan. After three years, requests to change or remove goals on the plan should be made in writing to VSHA so that the ITSP is not being changed solely for the purpose of achieving graduation from the program.

### **The Escrow Account**

The escrow account is an incentive offered to FSS program participants. When a family experiences an increase to the Total Tenant Payment (TTP) as a result of earned income, the resulting increases will be matched in an escrow account pursuant to the rules and regulations established by HUD for the calculation of said escrow.

VSHA will credit escrow accounts monthly and calculations will be made when an interim or annual reexamination is processed. The family will be provided with a complete escrow statement annually which will reflect beginning and ending balances, deposits, withdrawals, and interest accrued.

### ***Interim Disbursement of FSS Funds***

VSHA will consider requests for interim disbursements from the FSS participant's escrow accounts based on the following guidelines:

- To be considered for an interim disbursement, the family must have met at least one interim goal.
- The family must be enrolled for at least twelve months before requests for disbursements will be considered.
- A family must be in good standing with the Section 8 and FSS program.

Written requests for interim disbursements will be considered if the request is directly related to goals outlined in the ITSP. Requests should include documentation of the expenses and describe how the funds will facilitate the completion of the ITSP. Alternate funding sources should be exhausted before a participant requests an interim disbursement of escrow, and the total disbursement, if granted, will typically be no greater than 25% of the total escrow account

balance. No more than one interim disbursement will be granted within the term or extension of the Contract of Participation.

Generally, VSHA will not approve requests for interim disbursements that exceed 25% of the amount currently being held in escrow for a participant. Exceptions may be made for expenses associated with the FSS participant's purchase of a home through the Section 8 Homeownership Program. Exceptions to this interim disbursement policy will be made only with the approval of the Director of Housing Program Administration.

### ***Forfeiture of Funds***

Funds in the FSS Escrow account will be forfeited if:

- The FSS family is deemed to be in non-compliance with the obligations set forth in the Contract of Participation.
- The FSS participant voluntarily terminates enrollment in the FSS program.
- The FSS family loses their housing assistance due to violation the obligations of the Section 8 HCV or Project-Based voucher program.
- The FSS participant fails to achieve the obligations and requirements of the Contract of Participation and ITSP within the applicable timeframe and extensions.

### ***Disbursement of Escrow Funds upon Contract Completion/Graduation***

The amount in the FSS escrow account in excess of any amount the FSS family owes to VSHA will be disbursed to the FSS participant upon completion of the Contract of Participation according to regulation.

A participant must meet the following criteria in order to receive any money in the escrow account:

1. The head-of-household has obtained suitable full-time employment of at least 32 hours per week.
2. All members of the household have been independent of welfare cash assistance for at least 12 consecutive months prior to the requested graduation date, or no FSS family member is receiving welfare cash assistance on the date that 30% of the family's adjusted monthly income is greater than the FMR for the unit in which they are eligible.
3. All the activities on the ITSP have been completed.
4. The participant is in compliance with all the obligations set forth in the Contract of Participation.
5. The household is in full compliance with the lease.

In order to request the disbursement of funds from the escrow account, the participant should submit a request in writing that describes how the family has satisfied the terms of the Contract of Participation and the ITSP. The family should certify that no member is a recipient of welfare case assistance for at least 12 consecutive months before the requested graduation date or upon

the date that 30% of the family's adjusted monthly income exceeds the Fair Market Rent for the unit in which the family is eligible based upon PHA standards.

The FSS participant may request graduation prior to the completion of the contract term or any granted extensions if the family requests graduation and VSHA determines that the Contract of Participation and terms of the ITSP have been satisfied, or if 30% of the family's adjusted income exceeds FMR as described above.

VSHA may request verification that goals have been completed, including but not limited to requiring documentation that a participant has reached the employment requirement and obtained any applicable certifications, diplomas, et cetera, or verification that the family has been free from welfare cash assistance for the required time period.

In the event that requests for interim disbursements or graduation from the FSS program are not granted, the participant will be notified in writing of the determination and reason for the decision, and will be informed of grievance procedures and the timeframe for submitting requests for an informal hearing.