

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
PURPOSE, SCOPE, APPLICABILITY	24 CFR 984.101/105			
FSS Entities Eligible	Yes	Yes	Yes	Yes
Mandatory or Voluntary	Voluntary unless rec'd new vouchers between 1993 and October 21, 1998 and have not successfully completed that number of FSS	Voluntary	Voluntary unless transitioning PH to PBV RAD. In this case, PHA must continue to serve PH FSS participants transferred to PBV until completion	Voluntary- all privately owned multifamily housing properties that receive PB Section 8 rental subsidy through a Housing Assistance Payment (HAP) contract with HUD Pg. 1
Enabling law and regulation	Section 23 of the United States Housing Act of 1937.	Section 23 of the United States Housing Act of 1937.	Section 23 of the United States Housing Act of 1937.	Consolidated Appropriations Act, 2015, Pub. L. No. 113-235. Pg. 2
FUNDING				
Coordinator Funding	Congress approved FSS Coordinator Grant Annual NOFA	Congress approved FSS Coordinator Grant Annual NOFA	Congress approved FSS Coordinator Grant Annual NOFA	Congress has not approved new funding. Pg. 3 Owners may use residual receipt accounts for coordinators for FSS. HUD Handbook 4350.1, Chapter 25, "Residual Receipts" and H2016-08. Includes advances and using remaining residuals to fund FSS Coord next year.
DEFINITIONS	24 CFR 984.103			
FSS Family or FSS Participant	HOH	HOH	HOH	FSS program shall be available to any aged [sic] participant above 18 years of age Pg. 4

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
Individual Training Service Plan	HOH and any adult who chooses to have ITSP and PHA approves	HOH and any adult who chooses to have ITSP and PHA approves	HOH and any adult who chooses to have ITSP and PHA approves	MF COP "Instructions" says "Other family members 18 and older may choose to execute an ITSP if agreed by the owner. HOH and each adult member who elects to participate in the FSS program. Owner does not have to approve. Pg. 4 MF COP "Instructions" says "Other family members 18 and older may choose to execute an ITSP if agreed by the owner.
Program Coordinating Committee	Committee required/can be joint with another PHA or Owner/can be an existing committee Participant and PHA staff Required PCC Membership	Committee required/can be joint with another PHA or Owner/can be an existing committee Participant and PHA staff Required PCC Membership	Committee required/can be joint with another PHA or Owner/can be an existing committee Participant and PHA staff Required PCC Membership	Committee required/can be joint with another PHA or Owner Pg. 4 and Pg. 11 No Required PCC Membership
ACTION PLAN	24 CFR 984.201			
Development of the Action Plan	Required in consultation with PCC	Required in consultation with PCC	Required in consultation with PCC	PCC required but not in consultation with PCC – policy Pg. 8
Approval of Action Plan	Approval criteria not defined	Approval criteria not defined	Approval criteria not defined	Owner must rate Satisfactory or higher on most recent Management

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
Revisions to FSS Action Plan	Must submit to field office if change in policy or program size	Must submit to field office if change in policy or program size	Must submit to field office if change in policy or program size	and Occupancy Review, be current in submission of Annual Financial Statements and Monthly Accounting Reports for prior three-year period, and have resolved all compliance flags. Pg. 8 Must submit if change in policy or program size. Modification for increased program size is required only if there is a concurrent request for an additional residual receipts amount. Pg. 9
Action Plan Description of Coordinator Funding	None Required	None Required	None Required	Action Plan must include how FSS program coordinator will be funded and include a strategy for continuing funding over at least next five years. Pg. 10
Action Plan Optional Additional Information Combined FSS Programs	PHA may operate a joint FSS program with another PHA	PHA may operate a joint FSS program with another PHA	PHA may operate a joint FSS program with another PHA	An owner may operate a joint FSS program with another multifamily assisted housing owner or PHA. Owner must submit a joint Action Plan and a signed agreement to create and operate a combined FSS program. An owner with multiple

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
				properties participating in FSS has the discretion to choose between submitting an individual Action Plan for each property, or a "joint" Action Plan for multiple properties. Pg. 10
FSS FAMILY SELECTION	24 CFR 984.203			
FSS Family Selection	May only exclude: Previous FSS participants who were terminated; Families that owed money to a PHA; Families who do not meet motivational screening criteria; and Families who need a service that is not available and the service cannot be replaced by another service.	May only exclude: Previous FSS participants who were terminated; Families that owed money to a PHA; Families who do not meet motivational screening criteria; and Families who need a service that is not available and the service cannot be replaced by another service.	May only exclude: Previous FSS participants who were terminated; Families that owed money to a PHA; Families who do not meet motivational screening criteria; and Families who need a service that is not available and the service cannot be replaced by another service.	Owners must provide a description of the procedures to select families for participation in the FSS program. [...] The description should [making this policy] include any ineligibility criteria, such as a record of failing to comply with lease requirements or having been previously terminated from the FSS program. Pg. 9 And then states, 'Eligible families must [making A system mandatory] be selected according to an objective system, such as a lottery, the length of time living in subsidized housing, the date the family expressed an interest in

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
				participating in the FSS program, prior participation with poor results, history of on-time rent payments, or no lease violation notices within the past year. [making these choices optional] Pg. 11
PROGRAM OPERATION	24 CFR 984.301			
Timetable	None for voluntary program	None for voluntary program	None for voluntary program	Owners using residual receipts to employ an FSS program coordinator must begin program operation within 12 months of the approval date to use the residual receipts. Operation means that activities such as outreach, participant selection, and enrollment have begun. If this does not occur, owner must submit an updated action plan for HUD approval. Amounts not covered by an approved, updated plan of action must be returned to the residual receipt account prior to the close of the project fiscal year. Pg. 12
Coordinator Funding				Owners may use available

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
Residual Receipts				residual receipts to support the position of the FSS program coordinator. Residual receipts may not be used for any other FSS program expense other than supporting the position of the FSS program coordinator. Pg. 14 To justify approved residual receipt amounts, owners must establish an acceptable FSS program coordinator to individual FSS participant ratio within nine months of the residual receipts approval date and on an ongoing basis thereafter. HUD may reduce future residual receipt amounts if participant levels fall short of the initial approved program size. See Section IV.B.3 above for information on staffing guidelines. Pg. 15
Staffing Ratios	Policy. In Coordinator grant: 25 to 1	Policy. In Coordinator grant: 25 to 1	Policy. Coordinator grant: 25 to 1	Policy. In H-2016-08: 25 to 1

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
	75 to 2 125 to 3 etc. 24 CFR 984.303	75 to 2 125 to 3 etc.	75 to 2 125 to 3 etc.	50 to 2 etc.
CONTRACT OF PARTICIPATION				
Contract of Participation	Same	Same	Same	Same except; Program names have been changed Changes noted in this column of this chart have been made and There is no requirement to do an interim at start if more than 120 days has passed since last recertification.
Baseline Figures	Annual Income Earned Income Family Rent= 30% MAI	Annual Income Earned Income Family Rent= TTP	Annual Income Earned Income Family Rent= 30% MAI	Annual Income Earned Income TTP
Term of Contract of Participation	Effective 1 st day of month following signing. Ends 5 years later.	Effective 1 st day of month following signing. Ends 5 years later.	Effective 1 st day of month following signing. Ends 5 years later.	Effective 1 st day of month following signing. COP Pg. 17
Extensions to COP	Good cause up to 2 years for a total contract of 7 years	Good cause up to 2 years for a total contract of 7 years	Good cause up to 2 years for a total contract of 7 years	Good cause up to 2 years for a total contract of 7 years Except if initial HAP contract's term is less than 5 years, the Cop may be extended upon renewal of the Section 8 contract, so long as the HAP contract's renewal term covers the full

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08 term of the COP Pg. 17
Completion Of The Contract	Two ways to complete: 1) Meet all the obligations under the contract [HOH employed, HH free of welfare 12 consecutive months at end, and all goals accomplished or 2) 30% of MAI $\pm$ FMR for unit entitled to If head is employed and HH is free of welfare for 12 months, PHA may have policy to delete goals, complete, and release escrow if family is porting and cannot be in FSS in RH	Two ways to complete: 1) Meet all the obligations under the contract [HOH employed, HH free of welfare 12 consecutive months at end, and all goals accomplished or 2) 30% of MAI $\pm$ FMR for unit entitled to	Two ways to complete: 1) Meet all the obligations under the contract [HOH employed, HH free of welfare 12 consecutive months at end, and all goals accomplished or 2) 30% of MAI $\pm$ FMR for unit entitled to	One way to complete: Meet all the obligations under the contract: 1) HOH employed 2) HH free of welfare 12 consecutive months at end, and 3) All goals accomplished. If head is employed and HH is free of welfare for 12 months, owner may have policy to modify goals, complete, and release escrow if family is ending participation in PB S8 program If head is employed and HH is free of welfare for 12 months, owner must modify goals, complete, and release escrow if family is moving to HUD assisted project and new project does not have FSS Pg. 26[info is same as 58]
Transferring FSS				If the property offering the FSS program is sold, the next owner is obligated to

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
ESCROW ACCOUNTS	24 CFR 984.305			assume and meet the terms of the FSS contracts, as long as the rental subsidy continues. Pg. 18
Escrow Calculation Worksheet	Same	Same	Same	Same
Establishing the Escrow Account	PHA deposits FSS account funds of all families participating in the PHA's FSS program into a single depository account. PHA must deposit FSS account funds in one or more HUD-approved investments. HAP	PHA deposits FSS account funds of all families participating in the PHA's FSS program into a single depository account. PHA must deposit FSS account funds in one or more HUD-approved investments. RENT REVENUE	PHA deposits FSS account funds of all families participating in the PHA's FSS program into a single depository account. PHA must deposit FSS account funds in one or more HUD-approved investments. HAP	Owner establishes an interest-bearing escrow account for all FSS families, with separate accounting for each participating FSS family. Pg. 21 No HUD approved investment. Pg. 21 HAP via creating a monthly Owner/Agent Request (OARQ) as a positive adjustment to the voucher. Pg. 20 Instructions Pg. 21
Crediting The Escrow Account	PHA must debit the HAP account and credit the HCV escrow account at least annually	PHA must debit the HAP account and credit the HCV escrow account at least annually	PHA must debit the HAP account and credit the HCV escrow account at least annually	Owner shall credit monthly, to each family's FSS account, the amount of the FSS credit. Pg. 22 f.
Forfeited Escrow	Returns to HAP	Returns to Rent Revenue (other income)	Returns to HAP	All forfeited escrow account funds must be remitted to HUD by creating a negative

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
				Owner/Agent Request (OARQ) adjustment on the property's HAP voucher. Pg. 17
PORTING AND TRANSFERRING	24 CFR 984.306			
Transferring between Assisted Programs	<u>Transferring from PH to HCV or vice versa</u> COP is transferred Escrow remains in two accounts: 1 for HCV and 1 for PH	<u>Transferring from PH to HCV or vice versa</u> COP is transferred Escrow remains in two accounts: 1 for HCV and 1 for PH	<u>Transferring from PH to HCV or vice versa</u> COP is transferred Escrow remains in two accounts: 1 for HCV and 1 for PH	<u>Transferring from MF to HCV/PH or vice versa</u> The current escrow balance and CoP must be transferred to the Public Housing or HCV program or vice versa. Pg. 27
REPORTING	24 CFR 984.307			
Reporting on FSS	PIC 50058 SEMAP	PIC 50058 SEMAP	PIC 50058 SEMAP	Owners must submit a quarterly report [info is same as on FSS 58 Addendum] on each FSS family with an active FSS CoP, FSS families who have completed, and FSS families that have a terminated CoP. Owners shall compile the individual families' reports into one submission. HUD Account Execs will review and approve the owner's quarterly reports. See attachment to Notice H-2016-08. Pg. 28 Failure to submit may result

**FAMILY SELF SUFFICIENCY
ASSISTED HOUSING FSS PROGRAMS
COMPARISON CHART**

TOPIC	Housing Choice Vouchers 24 CFR 984	Public Housing 24 CFR 984	Project Based Vouchers 24 CFR 984	Multi Family-PBRA Notice H-2016-08
				in termination of FSS and use of residual receipts. Pg. 30
Monitoring	No description	No description	No description	During an on-site Management and Occupancy Review (MOR) or as part of an off-site desk audit, HUD or the property's Performance Based Contract Administrator (PBCA) staff will review the accuracy of the: (1) executed CoP and (2) calculation of escrow. HUD will determine the frequency of additional on-site reviews and off-site reviews specific to FSS, based on each property's particular circumstances. If proper documentation is absent or insufficient, HUD will make efforts to work with the owner to correct the problems before an FSS program is terminated. Pg. 31