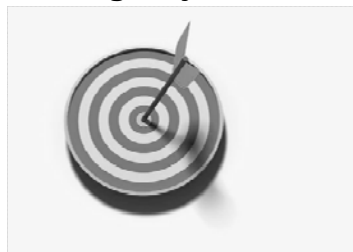


Multi Family Family Self-Sufficiency



Experience - Leadership - Collaboration

Training Objectives



Multi Family, HCV and PH FSS



Multi Family-PBRA Notice H-2016-08



PURPOSE, SCOPE,
APPLICABILITY



FSS Entities Eligible

- HCV, PH and now Multi-Family
- Mandatory or Voluntary
 - Voluntary- all privately owned multifamily with PB S8 (Pg. 1)
- Enabling law and regulation
 - 2015 Consolidated Appropriations Act (Pg. 2)



Funding



- Congress has not approved new funding
- 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 COP next year



Definitions

- FSS Family or Participant
 - Notice says over 18 (pg. 4)
 - Contract says 18 and over



Individual Training Service Plan

- 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
 - Pg. 4 and Pg. 11
- No Required PCC Membership



Action Plan

- Development of the Action Plan
 - PCC required no consultation with PCC (Pg. 8)
- Approval of Action Plan
 - Owner must rate Satisfactory on Management and Occupancy Review
 - Current Annual Financial Statements/Monthly Accounting Reports 3 years
 - Resolved all compliance flags. (Pg. 8)



Action Plan

- Revisions to FSS Action Plan

- Must submit if change in policy or program size
- Revision for increased program size required only if there is request for additional residual receipts amount.

- Pg. 9



Action Plan

- Description of Coordinator Funding

- Must submit to field office 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

- Optional Additional Information

- Combined FSS Programs
 - May operate joint FSS program with another MF owner or PHA
 - Must submit joint Action Plan and signed agreement
 - Owner with multiple FSS properties may submit Action Plan for all or each (Pg. 10)



FSS Family Selection

- Must describe selection procedures
 - Should [policy] include any ineligibility criteria such as
 - Record of failing to comply with lease requirements or
 - Previously terminated from FSS program
 - Pg. 9



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FSS Family Selection

- Families must be selected using objective system
 - Lottery
 - length of time living in subsidized housing
 - Date family expressed interest FSS
 - *Prior participation with poor results*
 - *History of on-time rent payments*
 - *Lease violation notices within Past year*
 - Pg. 11

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Program Operation

- Timetable to implement program
 - If using residual receipts to employ FSS coordinator
 - Must begin operation w/i 12 months
 - Of approval date to use residual receipts
 - Operation means activities (outreach, selection, enrollment) have begun
- If not - must up date action plan & return residual receipts

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Program Operation

- Coordinator Funding & Residual Receipts
 - Residual receipts may only be used for FSS program coordinator. (Pg. 14)
 - Must enroll appropriate #
 - Within 9 months of residual receipts approval date
 - Keep that # on an ongoing basis
- HUD may reduce future residual receipt levels fall short (Pg. 15)



Program Operation

- Staffing Ratios
 - Policy - In H-2016-08
 - 25 participants to 1 Coordinator
 - 50 participants to 2 Coordinator
 - And etc.



Contract Of Participation

- Contract of Participation is the same as for HCV, PBV AND PH
- Must use MF contract because names and some regulations are different
 - No interim if recert is more than 120 days
 - Baseline figures
 - Completion



Contract of Participation



Contract Of Participation

- Baseline Figures
 - Annual Income
 - Earned Income
 - TTP



Contract Of Participation

- Term of Contract of Participation
 - Effective 1st day of month following signing
 - Ends 5 years later unless...
 - May not be longer than remaining term of owner's Section 8 HAP contract
 - Pg. 17



Contract Of Participation

- Extensions to COP
 - Good cause up to 2 years for total contract of 7 years unless...
 - Owner's HAP contract's term is less than 5 years
 - Cop may be extended upon renewal of Section 8 contract
 - As long as HAP contract's renewal term covers the full term of the COP
 - Pg. 17



Contract Of Participation

- Completion Of The Contract
 - One way to complete...Meet all the obligations under the contract
 - HOH employed
 - HH free of welfare 12 consecutive months at end, and
 - all goals accomplished



Contract Of Participation

- Completion Of The Contract
 - However if head is employed and HH is free of welfare for 12 months
 - Owner may modify goals, complete, and release escrow if family is ending participation in PB S8 program OR
 - 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



Contract Of Participation

- Transferring FSS
 - If property offering FSS is sold next owner is obligated meet terms of FSS contracts
 - As long as rental subsidy continues
 - Pg. 18



Escrow Accounts

- Escrow Calculation Worksheet – Same
- Owner establishes interest-bearing escrow account for all FSS families
 - Separate accounting for each FSS family
- No HUD approved investment
- Escrow comes from HAP
 - Via monthly Owner/Agent Request (OARQ)
 - Pg. 21/22



Escrow Accounts



- Crediting Escrow Account
 - Owner must credit monthly each family's FSS account
- Forfeited Escrow
 - Forfeited escrow must be remitted to HUD
 - Create a negative Owner/Agent Request (OARQ) adjustment on property's HAP voucher
 - Pg. 17



Transferring

- Transferring from MF to HCV/PH or vice versa
 - Current escrow balance and COP must be transferred to Public Housing or HCV program or vice versa.
- Pg. 27



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Reporting

- Owners must submit quarterly report on
 - FSS family with active FSS Cop
 - FSS families who have completed, and
 - FSS families have a terminated COP
 - Owners shall compile individual families' reports in one submission
 - Info is same as on FSS 58 Addendum
 - Failure to submit may result in termination of FSS and use of residual receipts
- Pg. 28/30

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Monitoring

- HUD staff will review accuracy of
 - Executed Cop
 - Calculation of escrow
 - HUD will determine frequency of reviews based on performance
 - HUD will make efforts to work with owner before FSS program is terminated
- Pg. 31

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