

### Family Self-Sufficiency: New Grantee Kickoff! Welcome FY New 2022 Grantees!

Wednesday, February 14, 2022 @ 1 pm ET





# Get with the Program...

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# Agenda

### ✓ **FSS 101**

- Grant Agreement
- ✓ Startup Steps
- What's Next



#### Administering an Effective Family Self-Sufficiency Program:

A Guidebook Based on Evidence and Promising Practices



U.E. Department of Housing and Ulberi Development Office of Public and Imden Housing



# What is FSS?

The Family Self-Sufficiency Program (FSS), helps assisted housing residents increase their earnings and build financial assets. The program has two key features:

# A financial incentive for residents to increase their earnings in an escrow account that grows as residents' earnings increase

 TTP continues to go up as normal, but the difference between the baseline subsidy and the new subsidy calculation is escrowed instead of the HUD subsidy being reduced

**Case management or coaching** to help residents access services they may need to overcome barriers to employment and strengthen their financial capability

- The program is voluntary for both owners and residents
- Goals in the Contract of Participation (CoP) and Individualized Services and Training Plan (ITSP) are individualized based on FSS participants' needs and goals
- Head of Household does not need to participate or sign the CoP for other household members to participate

#### ESCROW SAVINGS ACCOUNT





# **FY 2022 FSS New NOFO Competition**

- Unique Applications Received: 273
- Eligible Applicants: 243
- Number of Funded New PHAs: 32
- Number of Funded PBRA Owners: 38
- Total Funded New Applicants: 70
- Remaining Unfunded Applicants: 173
- Award Amount for New PHAs: \$2,560,124
- Award Amount for PBRA Owners: \$3,5
- Total New Awards:

\$2,560,124 \$3,534,744 **\$6,094,868** 

# **New: FSS for Multifamily PBRA Owners!**

### **FSS Timeline**

- 1990: The program has operated in Public Housing and Voucher programs
- 2015: Congress authorized FSS for Project-Based Renal Assistance (PBRA)
- 2018: PBRA owners eligible for grants with the re-authorized statute
- 2022: FSS New Final Rule published, putting new statute into effect
- Now: Multifamily PBRA properties are grant funded for the first time!

### Impact on Multifamily FSS programs

- Multifamily owners can still use other funding sources including private grants, residual receipts, and other property funds
- Non-funded properties may continue voluntary, unfunded FSS programs
- Serving residents through Cooperative Agreements is an option between PHAs or other private owners (owner is still responsible for escrow)
- Minimum participation is generally 5 years, though some families graduate sooner (average of 3.5 years) and others get up to two-year extensions to continue

# **FSS Grant Basics**

- ONLY ONE Eligible Use of Grant Funds!
  - Salary & Fringe (including Training Stipend)
- NEW grants pay for salary and fringe benefit costs for <u>1 Full-Time Equivalent (FTE)</u> FSS coordinator
- Cooperative Agreements
  - Grantees can serve other PBRA properties through cooperative agreements (sample forthcoming)
  - CANNOT serve Section 202/811 properties
- Joint Applicants
  - All properties will need to submit an action plan
  - Sites will share an FSS coordinator who will serve all sites
  - Each owner will be responsible for escrowing their own tenants
  - FSS coordinator will need to coordinate with all served properties to ensure vouchers are correct

# **FSS Escrow Funds**

### – Whose Escrow?

- Escrows are HUD funds until a participant graduates and receives their escrow
- Interim Disbursements
  - Participants can get interim disbursements for tuition or other costs (per local policy), and will receive their remaining escrow upon graduation

### Forfeited Escrow

- If a participant doesn't graduate, the escrow stays with the program to use ONLY for the benefit of FSS participants (uses per local policy)
- **NOTE:** There are NO limitations on family uses of their escrow after graduation!

# **Grant Agreement**

Where's the Grant Agreement?

#### Notice of Award (NOA) is found in Grant Solutions.

#### Grant Agreement is an attachment to the NOA

- Grantees "sign" for the grant in Grant Solutions and in so doing, commit to abiding by the Grant Agreement and NOFA.
- Field Offices don't have to do anything in order to obligate/accept funds.

#### Can also be found on the FSS Resources page

1/1/23 - 12/31/23

# "pre-award costs"

 Require approval from your FO/GS Period of Performance

## Eligible Activities

### Salary and Fringe

#### Fringe can include a training stipend

- Up to the program to decide how much/for what (related to FSS program/coaching)
- May include travel

#### THAT'S IT

- No admin
- No Indirect Cost Rate
- No services for participants

### Job-Sharing is allowable

• you may charge up to 40 hours per week (or whatever is your full-time) per coordinator to the grant, split however you choose.

#### Sub-Contracting is allowable

• Make SURE you have a strong agreement with clear communication about escrow

### FY21 and FY22 NOFO Eligible Activities

# Training could include...

- Membership to NAHRO/Compass Working Capital/AASC or other professional/industry organization that works with Service Coordinators
- FSS Regulations training
- Coaching
- Motivational Interviewing
- Trauma-Informed Care
- Financial Social Work Certification
- Human-Centered Design
- Etc.

# **Funding Restrictions**

#### **Ineligible Activities:**

- *PH or HCV Program Functions:* An FSS coordinator may perform some PH or HCV functions for FSS participants, such as annual reexaminations, if it enhances the effectiveness of the FSS program.
  - Prior HUD approval is required for an FSS coordinator to perform such functions.
- These functions are allowed as long as it enhances the effectiveness of the FSS program.
  - Section IV.F.3.b of the NOFA for more information.

### HCV/PH Program Functions

HCV or PH Program Functions: Per the FY 2022 FSS NOFA, the FSS Coordinator may perform routine HCV and/or PH program functions, such as annual reexaminations for FSS participants, on a limited basis and only if the use of the FSS funds enhances the effectiveness of the FSS Program. This provision is to be employed only to the extent that these functions do not interfere with the FSS Program Coordinator's ability to fully fulfill the role of the FSS Program Coordinator as their primary work. Performance of routine HCV and/or PH functions for non-FSS families does not enhance the effectiveness of the FSS program and is therefore an ineligible use of FSS funds. Additionally, per the FY 2020 FSS NOFA, while FSS funds may be used to perform some homeownership functions for FSS families, this may not be the sole function for which funds are used. Sections IV.F.2.b and IV.F.2.c of the FY 2020 FSS NOFA describe the requirements that must be met for these activities to be eligible.

 Grantees requesting to have the FSS coordinator perform HCV/PH program functions must submit, to its local HUD Field Office, a narrative justification, explaining the routine HCV and/or PH program function(s) performed by the FSS Program Coordinator, how it will enhance the effectiveness of the FSS program, and why it does not impede the ability of the FSS Program Coordinator(s) to effectively perform FSS functions. The Grantee must also certify that the function(s) is not performed for non-FSS families. Once the Grantee has received approval from its local HUD Field Office to complete these activities and has certified they will not perform them for non-FSS families, they are not required to submit this justification on an annual basis, i.e. Grantees only need this approval one time.

### Housing Counseling

- *Homeownership Functions:* FSS funds may be used to perform homeownership functions for FSS families only, but this may not be the sole function for which funds are used.
  - If your FSS Coordinator provides homeownership counseling you are required to be in compliance with the housing counseling rule to continue providing homeownership counseling.



<u>Mandatory FSS Training</u>. HUD has developed an Online Mandatory Training on the FSS program to provide guidance on how to develop and administer a successful FSS program. THE NEW TRAINING HAS NOT BEEN PUBLISHEDYET.



Once we publish the updated training, programs will have 60-90 days to complete. At that time, we will send FOs a list of PHAs that are in compliance. If you have grantees that are not in compliance at that time, you will need to put them on zero threshold until they are in compliance. Mandatory Training



**FSS Guidebook and other resources available on HUD Exchange** View the new <u>FSS Program Guidebook</u> published January, 2023 New FY22 Grantees

- Grantees must have an FSS Action Plan approved by their local field office before enrolling any FSS participants.
- During their first year of funding, new grantees are required to draft and submit an FSS Action Plan to their local field office for approval by <u>March 31, 2023</u>.
- If an updated FSS Action Plan has been approved prior to this grant, a new FSS Action Plan is NOT required, but may be submitted.
- Grantees must enroll at least 25 participants in their FSS program prior to 12/31/23 in order to be considered eligible for renewal funding with the FY24 Renewal FSS NOFO (all FY22 NEW grantees will get a grace year and be eligible for FY23 funding automatically).

### **Statutory and Regulatory Requirements**

FSS Program Termination Due to Reduced funding:
Loss of funding for the FSS coordinator position does not relieve a renewal applicant from the contractual obligation to families already under an FSS contract.



### Draw-downs

The HUD funds are to be made available based on actual need. The Grantee must make a drawdown only for incurred costs. Drawdowns in excess of need may result in special procedures for payments, or termination of the grant when there are persistent violations. Funds requisitioned through e-LOCCS must be disbursed within three calendar days after receipt of funds drawdown.

### FSS + RAD

- PH, HCV, PBV, RAD-affected, PBRA, Mainstream, EHV (and all special purpose vouchers), Homeownership vouchers = ALL CAN participate in FSS
- PHAs must enter into a cooperative agreement with the multi-family owner if they want to serve PBRA residents.
  - See RAD Notice Rev 4 PIH 2019-23 for more information
  - CSS-RAD Repositioning Matrix <u>https://www.hud.gov/sites/dfiles/PIH/documents/CSS</u> <u>%20Matrix.pdf</u>

### How long do I have to keep my records?

- If requested, submit any post-closeout reports, in the forms prescribed by HUD, for **up to three years** from the date of the submission of the annual financial report, per 2 CFR 200.334 "Retention requirements for records."
- Recommendation to keep participant files as long as possible.

# **Startup Steps**

### Where do we start?

### Set up LOCCS

Hire your FSS Coordinator

### Write your FSS Action Plan (and have it approved by HUD)

- Consider a Trauma-Informed Approach
- Make an outreach/engagement plan
- Launch your Program Coordinating Committee
- Create a Needs/Strengths Assessment

### Recruit FSS Participants

### Set up electronic Line of Credit Control System (eLOCCS)

- Want your money? You'll have to use eLOCCS to draw down your grant funds!
- How to get access? Complete the <u>eLOCCS Access Authorization</u> Form (HUD-27054)
- Important! When completing the Form (HUD 27054):
  - <u>Section 5a</u> (LOCSS Program Area): Indicate "ROSS" in section 5a
  - <u>Section 5b</u> (Program Name): Enter "Resident Opport and Self Sufficiency"

# Role of your FSS Coordinator (from the NOFO)

- 1. Build partnerships with employers and service providers in the community
  - Work with the Program Coordinating Committee (PCC) and with such local service providers
  - Ensure that FSS program participants are linked to the supportive services they need to achieve self-sufficiency
- 2. Ensure that an Individual Training and Services Plan (ITSP) is prepared for the head of the FSS family and each adult member of the FSS family who elects to participate in the FSS program
- 3. Ensure that the services included in the participants' Contracts of Participation are provided on a regular, ongoing and satisfactory basis
- 4. Ensure that participants are fulfilling their responsibilities under the Contracts
- 5. Ensure that FSS escrow accounts are established and properly maintained for eligible families
- 6. FSS coordinators may also perform job development functions (e.g., outreach to potential employers) for the FSS program
- 7. Monitor the progress of participants and evaluate the overall success of the program

# **Best Practices for Hiring your FSS Coordinator**

- An FSS Coordinator is NOT just another Housing Specialist!
- If an FSS Coordinator is paid 100% from the FSS grant, they should be spending 100% of their time on FSS
- Be flexible about where and when they work
  - Should be in the community meeting and building relationships with partners (coffee IS work)
  - Evenings and weekends may be required in order to meet participants where they are.
- FSS Coordinators (especially when not in a Resident Services department) are often isolated they need to be able to meet with their service coordinator peers.
- Senior/Executive staff may need to champion the FSS program to the Board and to leadership of potential partner organizations – only so much can be done/commitments made at the staff level
- Housing staff, Portability staff, other staff that interact with participants and their files need to know about FSS and can be a valuable asset to the FSS program
- The tone and regard of the FSS program is set by leadership and can have a major impact on the ultimate success
  of the program

Considerations for Hiring your FSS Coordinator

Does your staff reflect your participants?

Organic Intellectuals/Indigenous Knowledge vs. Professionals

Hiring current/former residents (pro/con)

Know your HR policies Background Checks Drug Tests

# Write your FSS Action Plan

Your Action Plan should reflect your policies (as required by regulation)

- Key components:
  - -Interim disbursements
  - Motivation as a selection factor
  - Re-enrollments
  - Program size
  - -Goal changes
  - Uses of Forfeited Escrow

# **FSS Action Plan Resources**

- <u>FSS Action Plan Checklist</u>
  - Required for Submission of Plans
- <u>Sample FSS Action Plan</u>
  - FSS Action Plan Webinar
  - <u>Slides from FSS Action Plan Webinar</u>

## **Consider a Trauma-Informed Approach...**

### A Trauma-Informed Approach (Four R's)

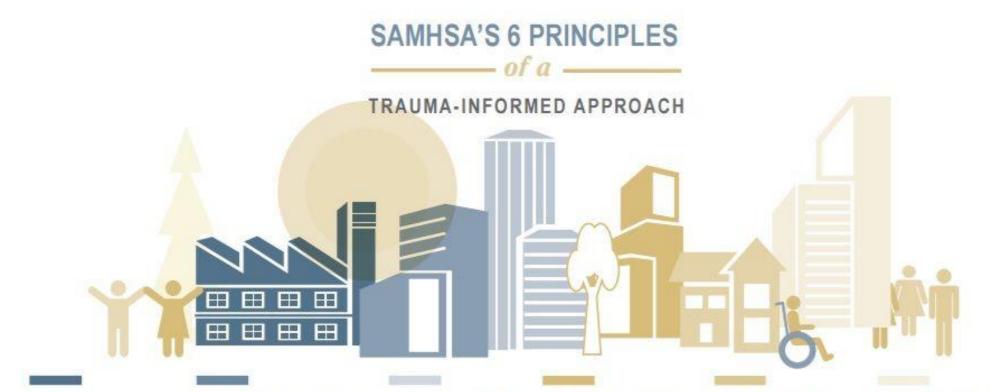
#### A trauma-informed program, organization, or system:

Realizes	• Realizes widespread impact of trauma and understands potential paths for recovery
Recognizes	• Recognizes signs and symptoms of trauma in clients, families, staff, and others involved with the system
Responds	<ul> <li>Responds by fully integrating knowledge about trauma into policies, procedures, and practices</li> </ul>
Resists	• Seeks to actively resist re-traumatization.
From SAMHSA's Concept Paper	

From SAMHSA's Concept Paper



## **Consider a Trauma-Informed Approach...**



#### SAFETY

Prevents violence across the lifespan and creates safe physical environments.

#### TRUSTWORTHINESS

Fosters positive relationships among residents, City Hall, police, schools and others.

#### EMPOWERMENT

Ensures opportunities for growth are available for all.

#### COLLABORATION

Promotes involvement of residents and partnership among agencies. PEER SUPPORT Engages residents to work together on issues of common concern.

#### HISTORY, GENDER, CULTURE

Values and supports history, culture and diversity.

### **Consider a Trauma-Informed Approach...**

### Start by viewing all work through the Social Determinants of Health & Wellness Lens to Increased Self-Sufficiency & Stability





Create and implement an when/where/how do you outreach/marketing plan? recruit?

Create a "with" or an "in-group"?



¥ \* \* \*

Capitalize on graduates as potential "thought leaders" or mentors

Convene a focus group or leadership circle of current or former or potential participants

Use social media – for outreach and/or for communication with participants - CAREFULLY

Make an Outreach/ Engagement Plan

# Launch your Program Coordinating Committee (PCC)

- How will you utilize your PCC? How will you ensure your meetings are helpful to your partners?
- Do you include families with lived experience with your systems and services as Subject Matter Experts on your PCC?
- Based on what you find in your needs assessments, do you have the right providers in place?
- Do you have to seek out any partners/services that you don't already have lined up?
- Are you having trouble finding partners for any specific needs?

Launch your Program Coordinating Committee



Are you reaching out to employers to promote FSS and your participants?

Do you know what kind of training employers want your participants to have?



Do you include Employers on your PCC?

# Collaboration

Asset Mapping – think wholistically and creatively

Include families with lived experience as Subject-Matter Experts

Establish a comprehensive program with an array of services

Work closely with social services agencies and other non-traditional partners – *a significant portion of work time should be working with partners and building and maintaining a network.* 

Cross-Train your program staff and other staff at your agency that work with your program – such as intake, rent re-certification staff, property management, etc.

# What's Next

# **Reporting and Monitoring**

## • PHAs

- Please see PIH Notice 2016-08
  - <u>Webinar</u>
  - <u>PowerPoint Slides</u>

# Multifamily Owners

- NEW! Annual Reports
  - No More Quarterly Reports! 🙂
  - More details to come...

## PIC Submissions

- HUD-50058, Section 17
  - Log Enrollments, Progress, and Exits
  - Must have at least one per year
- For PHA software providers
  - Update of warnings/errors in PIC FSS

- Multifamily Submissions
  - <u>Multifamily Reporting Tool</u>
  - Submit to Account Executive via the appropriate Incoming box

# **FSS Reporting and Monitoring**

## FSS Reporting

- <u>FSS Annual Report</u>
- Report requirements ALREADY established in the FSS New Final Rule!
- Will likely be collected via a Microsoft Forms link (stay tuned...)

## FSS Monitoring

- <u>FSS Monitoring Review Tool Self-Assessment</u>
- Want to know if you're in compliance? Assess yourself!
- This is the exact tool that HUD will use when monitoring your program

## **FSS Escrow**

## FSS Escrow Resources

- Accounting Brief #26 Financial Reporting for FSS
- <u>PIH Notice 2022-20 on Establishment of the Escrow Accounting Line</u> and Use of Forfeited FSS Escrow
- <u>Webinar on the changes in Escrow regulations and new Escrow</u>
   <u>Calculation Workbook (slides)</u>
- FSS Escrow Spreadsheets
  - <u>Sample for PHAs</u>
  - <u>Sample for Project-Based Rental Assistance (PBRA) Owners</u>

# **Key FSS Resources**

## FSS Action Plan

- -<u>Checklist</u>
- -<u>Sample Action Plan</u>
- -<u>Action Plan Webinar</u> (slides)

## FSS Contract of Participation (CoP)

- <u>HUD-52650</u>
- <u>HUD CLIPS</u> has CoP translated in 10 languages!

# **FSS Foundational Documents**

### FSS FY 2022 Notice of Funding Opportunity (NOFO)

- FSS Notice of Funding Availability
- Eligible Activities

#### FSS FY 2022 Grant Agreement

– FY22 Grant Agreement for Renewal and New FSS grantees

#### FSS Statute

- Section 23 of the 1937 Housing Act
  - <u>SEC. 23. [42 U.S.C. 1437u]</u>

#### FSS Regulations – 24 CFR Part 984

# **FSS Peer Support**

#### PLEASE NOTE: These are not endorsed or monitored for accuracy by HUD!

#### Compass FSS Link

- Peer discussion board
- Program management
- Financial coaching tools and templates
- Monthly webinars
- National FSS conference
- National Association of Housing and Redevelopment Officials (NAHRO)
  - Listserv provides a forum for discussion of information
  - Participants share thoughts, ideas, resources and documents
  - FSS+subscribe@familyselfsufficiency.groups.io



#### NOTE: THIS IS NOT AN ENDORSEMENT!!

These training organizations provide (or have provided) FSS training:

- Compass Working Capital
- Nan McKay
- NAHRO
- Quadell
- Nelrod
- PIC Consulting
- Others?

**IMPORTANT: HUD DOES NOT REQUIRE A CERTIFICATION FOR FSS COORDINATORS** 

## **Resources**

#### FSS Resources Page

#### FSS HUD Exchange

- <u>Administering an Effective Family Self-Sufficiency</u>
   <u>Program</u>
- 25 Years of the Family Self-Sufficiency Program

#### FSS Questions

- PH & HCV: Field Office & FSS@hud.gov
- **PBRA:** Your Grant Specialist & <u>MF\_FSS@hud.gov</u>



#### Administering an Effective Family Self-Sufficiency Program:

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U.S. Department of Housing and Ulberi Development Office of Public and Index Housing



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# Questions?