

# **FSS Grantee Monitoring Self- Assessment Tool**



Training for Field Office Grant Administrators



# Overview



# Why monitor FSS programs?

- The IG says so
- We've been making grants for almost 30 years and have never had a coordinated monitoring plan
- Fiscal responsibility for tax-payer dollars is part of our job
- We want to help programs that are struggling
- We have TA available
- We want to learn from excellent programs
- We want to direct increases in funding to outstanding programs



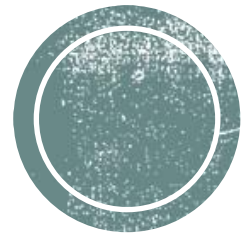
# Who will we monitor?

- Each Field Office will choose 20% of the FSS grantees under its purview each year
- Each FSS program will be monitored once every five years

How do we pick?

- Use your knowledge of the performance of the program
- Look at the initial composite score
- Review financial trends
- Tack on an FSS review to a review your office is already doing for another purpose





# **Self-Assessment Tool**

General Program Implementation and Outcomes

**1. Do you have a current FSS Action Plan on file at the HUD field office? Does it meet the regulatory requirements under 24 CFR §984.201? (you may wish to refer to the FSS Action Plan Checklist)**

**What date was it last approved?**

- Every currently running FSS program (except one) has an FSS Action Plan that was approved between August and December, 2022.
  - Approval means that it DOES meet regulatory requirements.
- If the self-assessment says “no,” this is a problem. FSS Coordinators MUST be aware of the policies set in the Action Plan.
- FO should have a copy on file, sent from the PHAFSSActionPlan review team to the PIH Director and the transmittal letter with the Plan approval.

**Finding?**

- At this time, there should not be any findings on this one.



## 2. What is the PHA's most recent FSS Composite Score (full score on column and three metric scores)? (See scores issued 11/15/18 [https://www.hud.gov/sites/dfiles/documents/Copy\\_of\\_FSS\\_PMs\\_Measures\\_2018-11-13\\_final\\_website.xlsx](https://www.hud.gov/sites/dfiles/documents/Copy_of_FSS_PMs_Measures_2018-11-13_final_website.xlsx))

- Earnings Score
- Grad Score
- Participation Score
- Overall Composite Score Category
- We are working on an update to these scores. In the meantime, the most recent we have uses FY17 data.
- 1 is highest, 4 is lowest

	C	D	E	F	G	H	I	J	O	P	Q	R	S	T	U	V	W
1	Baseline Scores Using Final Methodology									Updated Scores Using More Recent Participation Data (FY 2015-2017)							
2	Final Methodology Earnings Measure					Final Methodology Grad Measure				Updated Participation Score					Updated Composite Score		
3	FSS Analyzed for Earnings	Avg Diff 'higher of' RAW	Adjusted Earnings Measure	p-value flag (adjusted <median, p<.1)	EARNINGS SCORE	# eligible for grad rate	% Grad	GRAD SCORE		FY2017 # of Partic	FY2017 Ratio	2015-2017 3-yr ratio	Best of FY17 or 3-yr	Updated PARTICIPATION SCORE	COMPOSITE SCORE NEW	COMPOSITE SCORE CATEGORY	
4	37	\$20,445	\$22,120	0	10	22	68.2%	10		105	4.20	2.85	4.20	10	10	1	

### Finding?

- You may want to note when a PHA's score is a 3 or 4.

### Recommendation?

- A remediation plan to improve score. The issues may be identified in other questions.





**3. Indicate the last three fiscal years in which the PHA was funded for FSS.**

**4. If the PHA was not funded under one or more of the last three NOFAs, why not? (e.g. did not qualify because you were not serving enough participants? Forgot to apply? Application was late?)**

**5. If the grant amount was reduced in any of the last three years, indicate why. (e.g. you dropped below the number of participants required to maintain level funding or your salary comparables did not support the amount you had been requested.)**

- FO can corroborate with your own records
- A reduction in funding can indicate problems with program implementation
- It is possible that the PHA requested less. That's OK.

### Findings?

- Did the PHA miss opportunities to apply for funding?
- Did the PHA lose eligibility due to not serving enough participants?

### Recommendations?

- Plan for ensuring they apply on time.
- Plan for ensuring they maintain enrollment (may dovetail with other questions).





**6. Does the PHA have slots left on a mandatory FSS program? If so, how many are remaining? *(Review Question 14 on the most recent SEMAP report.***

- FSS Coordinator at the PHA should have an understanding of the requirement and work with whomever completes the SEMAP reporting. See PIH Notice 2016-8
- *The number of mandatory slots was built and is reduced according to the FSS Statute, Section 23 in the 1937 Housing Act.*
- *The mandatory slots were built based on new voucher increments and PH units between 1990-1998.*
- *The number of mandatory slots is reduced by every graduation since 1998.*



# Mandatory Program Size (cont.)

- You may request information from HQ. HQ can provide a report that looks like this

PHA Code	PHA Name	Program Type	HCV Slot with Exclusions	PH Slots	Total FSS Slots with Exclusions	Total FSS Graduates	Remaining Mandatory Slots with Exclusions
CTXXX	XXXXXXXXX Housing Authority	Combined	356	214	570	32	538

- The HCV and PH slots come from HQ historical records – we are doing our best to ground-truth these. If the PHA disagrees, they should present documentation to the FO.
- Graduations come from PHA reporting in PIC. If the PHA says they are wrong, the PHA should fix PIC or present the FO with documentation for the correct number of graduations.
- If you get this, please share with HQ.



**7. What is the Program Size indicated in the FSS Action Plan? (See *regulatory requirement under 24 CFR §984.105*). This can be easily changed (up or down) by updating the FSS Action Plan and re-submitting to the Field Office.**

*PLEASE NOTE – PHAs that had a mandatory program may continue to run a voluntary FSS Program after they have met their mandate. They may also run a program with a mix of voluntary and mandatory slots.*

*The “Program Size” must be AT LEAST EITHER*

- The number of currently required mandatory slots OR*
- The number of mandatory slots indicated on an FO-approved exception request*
- The number of participants the PHA is funded to serve per the latest NOFA competition.*

*If not mandatory and not funded, the PHA may set any program size they wish.*

*That number is a MINIMUM. The PHA may set the Program Size at ANY number they feel they can effectively serve. The PHA then must aspire to maintain that program size.*

*Program Size (please list Mandatory (from Q.6) + Voluntary = TOTAL)*



# Mandatory Programs Note

Note – per regulation, the PHA may approve an exception to run a mandatory program or an exception to run a program smaller than the mandatory program size.

These exceptions may be granted for 5 years at a time.

There is no provision to exempt a PHA from running a program forever.

## Finding?

- PHA has an existing Mandatory Program and they need an exception to run an FSS Program smaller than their Mandatory Program size.

## Recommendation?

- PHA submit request for either exception to FO.



**8. How many participants were participating in the program according to the PIC Report in Appendix C of the most recent NOFA?**

**8b. How many PH/HCV/PBV participants (DO NOT include PBRA in this question) are currently enrolled based on your PHA's internal records?**

**Do these two numbers match (or are very close?) *(if not, the final report will indicate that the you must update their process for entering FSS data into PIC and rectify the PIC numbers to their records. Refer to PIH Notice 2016-8***

**<https://www.hud.gov/sites/documents/pih2016-08.pdf>**

- This question is looking at actual enrollment vs. what is reported in PIC
- One of the things we need to determine is whether a low “participation” score is legitimate or whether it’s a reporting problem.
- Most recent Appendix C - <https://www.hud.gov/sites/dfiles/SPM/documents/FY22AppendixC2022Aug3.pdf>

Finding?

- PHA's records don't match PIC records.

Recommendation?

- PIC needs to be updated for all current participants.



**9. Are you serving any PBRA residents? Please indicate if those participants are residents of PHA-owned PBRA properties (such as a result of a RAD conversion) or if the PHA has a partnership with another local PBRA owner to serve their PBRA residents.**

**How many PBRA participants are currently enrolled, based on your PHA's internal records?**

- PBRA residents are not reflected in PIC.
- If a PHA is serving PBRA residents, the PBRA owner must have an approved PBRA FSS Action Plan and the PHA and PBRA owner must have a Cooperative Agreement
  - PBRA FSS Action Plans are approved by multifamily

**Finding?**

- PHA is serving PBRA residents and does not have a Co-Operative Agreement in place with the PBRA owner (even if the PBRA owner is the PHA, with a separate role).

**Recommendation?**

- There must be a Co-Operative Agreement put into place.
  - The FO does not have to approve the Co-Operative Agreement. It must be sent to the PBRA Account Executive.



**10. Including PH/HCV/PBV AND PBRA residents, how many total residents are being served by the PHA's FSS program (8b + 9 above)?**

**Is this close to the Program Size indicated in the FSS Action Plan (#7 above)?**

Finding?

- PHA's program is not at or above (or close to) the Program Size stated in their FSS Action Plan.

Recommendation?

- PHA needs a plan to increase/decrease their program size or
- PHA need to update their FSS Action Plan section on Program Size.





# 11. How many FSS graduates did you have in the last year?

- 11b. What was your graduation percentage from the latest Composite Score?
- National average is between 25%-35%

## Finding?

- PHA's Graduation percentage is below national average.

## Recommendation?

- Correct their historic graduation reporting in PIC (see PIH Notice 2016-8) or
- Identify why their graduation percentage is low and create plan to increase.
  - Are participants quitting?
  - Are their policies too strict?
  - Is PHA coaching not following up enough?
  - Do case managers/coaches need training?

% Grad	GRAD SCORE



**12. According to your PHA's internal records, how many new FSS enrollments were there in the last year?**

Finding?

- PHA is not enrolling enough participants each year to keep up with their program size.

Recommendations?

- Review TA on outreach and enrollment and create a strong outreach and marketing plan.
- Increase enrollment to goal in next year.



**13. According to your internal records, how many FSS participants were terminated from the FSS program in the last year? For what reason(s)?**

- Here you want to look for excessive or capricious terminations
- Are families being terminated only for not attending meetings?
- Were families terminated in compliance with PHA-set practices for warnings, notifications, etc.?

**Finding?**

- PHA is not following their own policies for termination or
- Policies on termination are not effective.

**Recommendations?**

- PHA must follow their own policies and potentially review past terminations or
- If policies are too strict, review TA available on termination policies and revise FSS Action Plan section on termination.



**14. How much escrow (number of participants and amount of escrow funds) was forfeited by terminated participants in the last year?**

- Look to see if it appears that the PHA is terminating families with particularly large escrows.
- It's not a question on the checklist (because it wasn't part of the regulations when it was written) but you may want to ask what their policies are on how to use forfeited escrow from the forfeited escrow account (must be in their FSS Action Plan) and if they are following their own policies.

**Finding?**

- If you have concerns about the number/percent of forfeited escrow (see also the previous question on terminations) you may want a deeper review into the situation for each of the recent large escrow forfeits.
- If you find a pattern/practice, this could be a situation for the IG.



**15. Do you have a functional Program Coordinating Committee as required by regulation (see 24 CFR §984.202)? Indicate how often the PCC meets and if it includes the required partners. (*The makeup of the PCC is required to be in the FSS Action Plan.*)**

**15a. Do you have MOUs with your PCC partners? How often do you review and updated the MOUs?**

**15b. Do you regularly track in-kind service contributions?**

- Required partners are the WIB/AJC/One-Stop and one resident from each rental assistance program that is served by FSS.
- There are no minimums for the number of partners on the PCC or the frequency of their meetings. Quarterly is standard.
- MOUs are not required, but a best practice.
- Tracking in-kind services is not required, but a best practice.

#### Findings?

- No discernable active PCC.
- PCC doesn't meet.
- PCC doesn't include the WIB.
- PCC doesn't include applicable residents.

#### Recommendations?

- Review TA on PCCs and create a plan to constitute/re-constitute PCC and come into compliance with regulations.
- Come into compliance within specified timeframe.



**16. Is the PHA keeping Escrow funds in a separate, interest-bearing account per requirements at 24 CFR §984.305(a)?**

- [Accounting Brief #26 - Financial Reporting for the Family Self-Sufficiency \(FSS\) Program](#)
- [PIH Notice 2022-20 on Establishment of the Escrow Accounting Line and Use of Forfeited FSS Escrow](#)
- Escrow must be credited each month (new regulation)
- Interest must be allocated on a pro-rated basis at least once a year

**Findings?**

- PHA is not keeping escrow in an interest-bearing checking account.
- PHA can't provide a ledger accounting for each participating family.

**Recommendation?**

- PHA must come into compliance within specified timeframe.



**17. Are the escrow bank account statements being reconciled to FSS Contracts of Participation? How often?**

Findings?

- PHA is not depositing escrow monthly (now a regulatory requirement).
- PHA is not distributing interest pro-rata to participants at least annually.

Recommendation?

- PHA must provide evidence of coming into compliance within specified timeframe.





**18. Are participants receiving proper notification of escrow accounts on at least an annual basis as required by *24 CFR §984.305(a)(3)*?**

Finding?

- PHA is not informing participants of escrow account balance at least annually.

Recommendation?

- PHA must provide evidence of coming into compliance within a timeframe.





**19. How many coordinators were funded by the grant? How many coordinators does the PHA employ? *(this may be more than the number funded by the grant but should not be less.)***

**19b. Have all positions authorized in the budget been filled?**

**19c. Number of Coordinators Employed – if more than funded, indicate source of funds in comments. If less than funded, indicate why in the comments.**

- [https://www.hud.gov/sites/dfiles/PA/documents/FSS\\_Renewal\\_State\\_Report.pdf](https://www.hud.gov/sites/dfiles/PA/documents/FSS_Renewal_State_Report.pdf) for number of coordinators funded by the FY22 grant

**Finding?**

- PHA has not employed the number of coordinators for which they were funded.

**Recommendation?**

- PHA comes into compliance in set timeframe.



## 20. What is the Participant-to-Coordinator Ratio?

Use PHA's # of Participants (#10) : # Coordinators Employed (19c)

*(this should be AT LEAST*

- *25:1 if only one coordinator or*
- *15:1 if only one part-time coordinator or*
- *50:1 for any coordinator greater than one*
  - *(75:2, 125:3, 175:3 etc.)*

FY2017 # of Participants	FY2017 Ratio	2015-2017 3-yr ratio	Best of FY17 or 3-yr

20b. What is the Participation Ratio from the latest Composite Score? *(a ratio of less than 1 may indicate a reporting problem)*

### Finding?

- PHA is funded and they are below minimum requirement for participation (if PHA is not funded, there is no minimum).

### Recommendation?

- PHA must provide plan to increase enrollment.
- See also Q.10 & 12



## **21. Do all positions have job descriptions?**

## **22. Do job descriptions correspond to the NOFA requirements (*refer to the Eligible Activities section in the most recent NOFA*) and the actual tasks performed?**

b. Responsibilities of FSS Program Coordinators. An FSS Program Coordinator must:

- ☐ Implement the FSS program as required by 24 CFR 984 (and 24 CFR 887 for PBRA owners). Be sure to become familiar with the updated regulations published on May 17, 2022.
- ☐ Create, Maintain and Update the FSS Action Plan (24 CFR 98 CFR 984.201) and all relevant local program policies.
- ☐ Create and implement an outreach plan and enroll FSS participant families, maintaining at least the minimum number to be served per this NOFO award.
- ☐ Ensure that an Individual Training and Services Plan (ITSP) is prepared for head of FSS family and each adult member of the FSS family who elects to participate in the FSS program. See Section I.A.4 for more information on eligible families.
- ☐ Build partnerships with employers and service providers in the community and work with the Program Coordinating Committee (PCC) and with such local service providers to ensure that FSS program participants are linked to the supportive services they need to achieve self-sufficiency, including services for participants with limited English proficiency. See Section I.A.4 of this NOFO ("Definitions") for the definition of PCC. For more information on Partnerships and Collaborations, see Notice PIH 2011-51, and for more information on partnerships between PHAs and Department of Labor Workforce Development Boards/One Stops, see "From the Ground Up: Creating Page 5 of 55 Partnerships between Public Housing Authorities and Workforce Investment Boards" at [https://www.hud.gov/sites/documents/14\\_DOL\\_PUBLICATION.PDF](https://www.hud.gov/sites/documents/14_DOL_PUBLICATION.PDF).
- ☐ FSS Coordinators may also perform job development functions (e.g., outreach to potential employers) for the FSS program.
- ☐ FSS Coordinators are encouraged to ensure that participants have greater access to financial education/literacy/empowerment/coaching programs that will help them acquire the knowledge and skills to make informed and effective decisions that ultimately help them reach their goals and achieve self-sufficiency and financial stability. This includes partnering with organizations that conduct financial education workshops that cover topics such as credit, debt, savings, budgeting, asset building and banking services; and/or organizations that can provide financial coaching. For information on financial empowerment tools and resources available to help HUD-assisted families enhance their financial empowerment and asset building skills, please see Notice PIH 2014-26 (HA) and the two-webinar series posted on <https://www.hud.gov/strongfamilies>
- ☐ Ensure that the services and supports included in the participants' Contracts of Participation are provided on a regular, ongoing and satisfactory basis; participants are fulfilling their responsibilities under the Contracts; and FSS escrow accounts are established and properly maintained for eligible families. This includes ensuring that FSS families are provided with a statement of their escrow account balance at least once each year, but more often is encouraged.
- ☐ Monitor the progress of participants, promote opportunities for them to increase their income and address and eliminate barriers to advancement and graduation.
- ☐ Oversee the account of forfeited escrow funds in accord with 24 CFR 984.305(f)(2) and local policy.



**24. Are FSS Program Coordinators required to perform any standard housing functions for FSS participants?**

***(If so, per the NOFA, the PHA must have sought approval from the field office by showing that these activities are adding benefit to the FSS program. For instance, Many FSS Program Coordinators prefer to do their own rent re-certifications for FSS participants because they feel it keeps them abreast of the current situation of their families and makes the process smoother within the PHA.)***

**If the answer is YES, please indicate what has been approved and when.**

***IF the answer is NO, does the Program Coordinator coordinate regularly with the Housing Specialists or Property Managers that do the standard housing work to stay abreast of income and employment changes of FSS participants?***

- *Unless the coordinator is paid with non-FSS funds in addition to FSS grant funds, this is against program rules.*
  - *If the coordinator is paid with non-FSS funds, the percent of time on non-FSS activities may not exceed the percent of salary*
- If the answer is “yes” you should have an approved request at the Field Office.
  - They only need one request/approval, not every year.
- *Refer to most recent NOFA for language.*
  - See [FY22 Instructions to the Field .docx](#) for guidance

**Finding?**

- **PHA is not in compliance with NOFO requirements.**

**Recommendation?**

- **PHA must change its practices to come into compliance or**
- **PHA must submit request to FO.**



**25. Does the Program Coordinator have a copy of the FSS regulations, the NOFA, the Grant Agreement, the PHA's FSS Action Plan?**

Finding?

- Program Coordinator(s) does not have access to all critical documents.

Recommendation?

- Program Coordinators must have access to all of these essential documents.





**26. Have all Program Coordinators completed the HUD-issued Promising Practices online training? <https://www.hudexchange.info/trainings/courses/family-self-sufficiency-training/> (The NOFA requires that at least one person at each PHA must have completed the training.)**

- We haven't posted the updated training yet. Once we post it, PHAs will have 60-90 days to complete it.

### Finding?

- PHA is not in compliance with NOFO requirement for one person from each program to have completed the new HUD online training.

### Recommendation?

- PHA must come into compliance.
- Grant funding will be suspended until PHA is in compliance.



**27. Have the Program Coordinators received any training on the FSS program regulations other than the HUD-issued Promising Practices guide and on-line training? Which training(s)?**

**28. Have the Program Coordinators received any training on services coordination/case management/coaching other than the HUD-issued Promising Practices guide and on-line training? Which training(s)**

- This is optional. Just informational and will help with knowing what could be recommended.
- Every PHA has the opportunity to include a training stipend (any amount) in their calculation of fringe benefits when they make their NOFO request for salary+fringe
- Best practice – every FSS Program Coordinator should take an FSS regulations class such as NAHRO, Nan McKay, etc.
- Other good training includes Trauma-Informed Care, Coaching, etc.

**No findings**

**Recommendation?**

- If the PHA has not included a training stipend as part of the coordinator(s) fringe benefits, consider adding it/requesting more in next NOFO, as applicable.



**29. How many years of experience in administering the FSS program does each Program Coordinator have?**

**30. Is there someone in a supervisory role that has more experience with FSS or other Service Coordination programs?**

**31. Does the grantee participate in a peer-to-peer exchange (e.g. Regional Round-Table) with other FSS grantees?**

- This is informational.

No findings

Recommendation?

- If there is a local peer-to-peer exchange, engage with it. If there is not one, consider starting one.





# **Grant and Financial Management**



**32. Does the PHA (the FSS program coordinator or another department such as Finance) have a satisfactory knowledge of how to access and draw funds from LOCCS?**

**33. Does the Grantee draw funds from LOCCS at least once every 90 days**

**34. Are the funds drawn from LOCCS disbursed within three calendar days of request?**

- *PHAs should be drawing as they incur costs – every two weeks or monthly (however often they do payroll).*
- *Often, we are seeing that PHAs will pay the Coordinator out of other funds and then “pay themselves back” when they get around to drawing FSS funds. This is not allowed.*
- *Please see Grant Agreement for draw and expenditure requirements.*

**Finding?**

- **PHA is not in compliance with NOFO requirements for financial draws and disbursements.**

**Recommendation?**

- **PHA needs to review work flows and procedures to come into compliance within timeframe.**



~~35. Has the grantee submitted a request to the field office to use funds for administrative purposes resulting from lapse in paying a Coordinator salary? Please indicate in the comments which year(s) the request was submitted, if the request was approved, what it was for, and if those funds have been expended on eligible activities. (This was only an option for Fy17-FY19)~~

~~36. Is the Grantee on track to expend the full grant amount by the expiration of the grant term? (or within a one quarter extension if use of funds for admin was approved in the last quarter of the grant)?~~

- Question 35 no longer applicable.

### Finding?

- PHA is currently not on track to fully expend by the expiration date of the grant.

### Recommendation

- If possible, PHA make draws to catch up to expenses incurred.
- PHA must modify practices to draw timely.



**37. Has HUD recaptured any FSS funds from the grantee within the past 3 years? If so, why?**

- If they expended less than 80% of their FY21 grant, they should have submitted a letter of explanation to the FO before gaining access to their FY22 funding.

**Finding?**

- PHA has history of not expending a significant portion of grant funds.

**Recommendation?**

- PHA make a plan to ensure that current grant funds are fully expended and/or
- PHA requests less (only the actual amount needed) in future NOFO applications.





**38. Is the PHA currently undergoing or planning any RAD conversion activity? If so, do you understand the implications for your FSS program and participants. (see the latest RAD notice language on FSS for both PBV and PBRA conversions [https://www.hud.gov/sites/dfiles/Housing/documents/H-2019-09-PIH-2019-23\\_RAD\\_Notice%20Rev4\\_20190905.pdf](https://www.hud.gov/sites/dfiles/Housing/documents/H-2019-09-PIH-2019-23_RAD_Notice%20Rev4_20190905.pdf)) – specifically do you understand that if you convert all of your PH stock and do not have HCV/PBV, you will no longer be eligible to apply for FSS funding?)**

**If you have converted to PBRA under RAD, are you in compliance with the Multi-Family FSS Requirements?**

- [CSS Repositioning matrix](#)
- two options: (1) If PHA continues to serve other HCV and/or PH FSS participants, the new owner may execute a cooperative agreement with PHA to serve FSS participants affected by the RAD conversion to PBRA; or (2) The owner can establish an independent FSS program.
- For PBRA FSS, to ensure HAP payments are processed correctly, and until TRACS is modified, the Project Owner must notify [MF\\_FSS@hud.gov](mailto:MF_FSS@hud.gov) there are current FSS participants residing in the Covered Project and adhere to the escrow and reporting requirements. The Project Owner may enter into a Cooperative Agreement with the PHA (the grantee), allowing the PHA to continue to provide service coordination to RAD-affected PBRA participants until all have completed their Contracts. The Project Owner must assume responsibility for the administrative duties associated with FSS such as calculating and crediting escrow and reporting. Ultimately, the new Project Owner is responsible for serving the RAD-affected FSS participants until the end of their CoPs.

**Finding?**

- The PHA is serving PBRA residents but does not have a Cooperative Agreement with the PBRA owner.

**Recommendations?**

- Establish a cooperative agreement with the PBRA owner within a timeframe or
- Stop serving PBRA residents (the PBRA owner is ultimately responsible for those CoPs).
- See also Q. 9



**39. Has the PHA's FSS program been audited by HUD's IG in the past five years? If so, what were the findings?**

**Have they been resolved satisfactorily?**

**40. Did the grantee have any major unresolved program management findings from an Inspector General audit, HUD management review, or Independent Public Accountant (IPA) audit for their HCV or PH programs, or other program compliance problems?**

**If yes, did any of the findings have any bearing on the FSS program, and have they been resolved?**

- This is probably no.

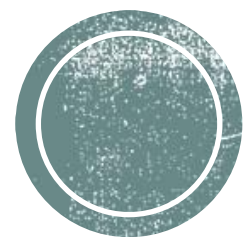
**Finding?**

- PHA has had FSS-related IG or other audit findings that are as-yet unresolved.

**Recommendation?**

- PHA must present plan to resolve findings and show that they are progressing in compliance.





# **Grantee Reporting and Closeout**



**41. Do you submit the annual report (SF 425 Financial Report and certifications of completion and compliance) in a timely manner (within 120 days of the end of the grant term)?**

**42. Is the FSS program regularly included in the PHA's Single Audit and are the results of an audit of the FSS program provided to the Field Office annually?**

- These are requirements. If not, these would be findings of the monitoring.

### Findings?

- PHA has not submitted the required close-out documentation.
- PHA has not submitted an audit as required.

### Recommendations?

- PHA comes into compliance within a timeframe.



**43. Are you subject to the Housing Counseling Certification rule?**  
**(<https://www.hudexchange.info/resource/5191/housing-counseling-new-certification-requirements-final-rule/>)**

**If YES, are you in compliance?**

- This is rare.

Finding?

- PHA is subject to the Housing Certification Rule and is not in compliance

Recommendation?

- PHA comes into compliance within a timeframe.



# FSS File Review

- **Do your client files (paper or electronic) include:**
- Completed FSS Application (if applicable)
- Contract of Participation with correct dates i.e. 5/1/2016 to 5 years from the first re-certification of income after the execution date of the CoP
- If the FSS participant is extended an additional year or two, cross off the original end date of the contract and hand write new date in pen, amend the ITSP in pen as well and have FSS participant sign off on it
- Corresponding documentation should be with ITSP i.e. if goal is to obtain GED, a copy of GED certificate should be with ISTP.
- 50058's should be in chronological order with corresponding Escrow Calculation sheets
- Annual Escrow statements should be in file, with beginning balance, deposits, interest
- Case notes should be in file in chronological order - they should reflect meetings that conform with the PHA's policies on number of contacts (some may do once a month, some once a year, some may have a triage system where more meetings are required until the person is in training/employed, etc..... the point is that the files should show that the PHA is following their own policies.)
- Should have "releases of Information" in file, new ones should be signed annually (no reg on this, required if the coordinator will be sharing client information with partners.)
- Exit documents should be, proof that no \$ is owed to PHA, documents that they are free of Welfare Assistance, and employment verification proof that they have complete goals in ITSP





# Resources



# 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
    - [SEC. 23. \[42 U.S.C. 1437u\]](#)
- **FSS Regulations**
  - [24 CFR Part 984](#)





# Key FSS Resources

- **FSS Action Plan**
  - [Checklist](#)
  - [Sample Action Plan](#)
  - [Action Plan Webinar](#) ([slides](#))
- **FSS Contract of Participation (CoP)**
  - [HUD-52650](#)
  - [HUD CLIPS](#) has CoP translated in 10 languages!



# Reporting and PIC

- **PIC Reporting**

- Please see [PIH Notice 2016-08](#)
  - [Webinar](#)
- [PowerPoint Slides](#)

- **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](#)



# FSS Escrow

- **FSS Escrow Resources**

- [Accounting Brief #26 - Financial Reporting for FSS](#)
- [PIH Notice 2022-20 on Establishment of the Escrow Accounting Line and Use of Forfeited FSS Escrow](#)
- [Webinar on the changes in Escrow regulations and new Escrow Calculation Workbook \(slides\)](#)

- **FSS Escrow Spreadsheets**

- [Sample for PHAs](#)



# 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](mailto:FSS+subscribe@familyselfsufficiency.groups.io)



# FSS Trainings

**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**



- **FSS Resources Page**

- **FSS HUD Exchange**

- [Administering an Effective Family Self-Sufficiency Program](#)
- [25 Years of the Family Self-Sufficiency Program](#)

- **FSS Questions**

- **PH & HCV:** Field Office & [FSS@hud.gov](mailto:FSS@hud.gov)

