U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT



Complying with Multifamily FSS Program Requirements

Danielle Garcia, HUD Carissa Janis, HUD

Training topics

• Summary of FSS Owner Requirements

 Program Development and Approval Procedures

• Role of HUD and PBCA



Summary of FSS Program Requirements

- Create FSS Escrow accounts and manage deposited funds
- Submit quarterly reports to HUD
- Comply with Fair Housing and Equal Opportunity Requirements



Summary of FSS Program Requirements

- Voluntary for MF owners and families.
- Write an action plan and submit to HUD for approval
- Provide service coordination, case management, or coaching, including referring, monitoring, and evaluating supportive services provided to FSS families
- Recruit resident participants
- Execute a Contract of Participation (CoP) with participating families



Action Plan

- The owner must develop and have a HUD approved Action Plan prior to implementing an FSS Program
- An owner must submit a complete Action Plan to the HUD email box <u>MF_FSS@hud.gov</u>
- HUD Headquarters monitors the email box <u>MF_FSS@hud.gov</u>.
- HUD Headquarters will document receipt of the action plan/residual receipts request and route to the property's Account Executive (AE) in the appropriate local field office, cc'ing the appropriate regional email box.
- The AE will issue final approval to the owner of the Action Plan and residual receipts request, if applicable.



Action Plan

- Owners shall not begin operating their FSS program before receiving the official approval from HUD.
- No further approval is required unless an owner proposes to make policy changes and/or increase the size of its program.
- Modification for increased program size is required only if there is a concurrent request for an additional residual receipts amount.



Action Plan Residual Receipts Requests

Other considerations for approval of residual receipts requests

- Exempt HAP Offset Requirements
- <u>Advance of Residual Receipts</u>. No more than **6 months** of expenses will be advanced at one time.
- <u>No Account Minimum</u>
- <u>Salary Amount for an FSS Program Coordinator</u> must be supported by comparables for similar positions in the local jurisdiction.
- <u>FSS Participant Ratio to FSS Program Coordinator</u>. One full-time FSS program coordinator is generally expected to serve at least 25 individual participants.
- <u>Justification of Approved Residual Receipts Amounts</u>. An owner must justify an acceptable FSS program coordinator to individual FSS participant ratio within **9 months** of the residual receipts approval date and an ongoing basis thereafter.



Action Plan Residual Receipts Requests

 If an owner is requesting to fund an FSS program coordinator through use of residual receipts, then the owner must complete form HUD-9250, "Funds Authorizations", and submit it as an attachment along with the Action Plan in the email sent to HUD.



Contents of the Action Plan

- Family demographics
- Estimate of participating families
- FSS family selection procedures
- Incentives plan
- Outreach efforts
- FSS activities and supportive services
- Funding



Contents of the Action Plan

- Identifying family support needs
- Owner FSS termination/denial policies
 - Family's failure to comply/withholding of escrow
 - Appeal rights/ grievance and hearing procedures
- Rights of non-participating families
- Timetable for program implementation



FSS Escrow Account

- Owners and Participants will execute an FSS contract with goals to be met within a 5 year period.
- If a family's <u>earned</u> income and rental payment increase while participating in FSS; owner will credit the incremental rent, due to the increase in earned income, to family's escrow account.
- Upon successful completion of 5 year contract, Participant is entitled to escrowed funds



FSS Escrow Account

- The FSS Escrow Account is not funded by the owner.
- Money is offset by additional HAP, via creating a monthly Owner/Agent Request (OARQ) as a positive adjustment on the voucher.
- As a general rule, the amount of the increase in TTP to the owner resulting from an increase in earned income is escrowed.





FSS Escrow Account

- Owner obtains the escrow amount by creating a monthly Owner/Agent Request (OARQ) positive adjustment on the property's HAP voucher and deposits the fund in the corresponding escrow.
- All FSS OARQ adjustments <u>must</u> indicate the Voucher Month/Year for the Escrow Credit, Unit Number, Head of Household's Last Name, and the words "FSS Participant" in the comments section.



FSS Escrow Account – Forfeiture of FSS account funds

- Forfeited escrow funds must be returned to HUD
- Negative OARQ adjustment on the monthly HAP voucher
- The adjustment must equal the total escrow balance as reported in the quarterly report.



Quarterly Reports

- O/As are required to submit quarterly reports to HUD.
- All quarterly reports are due to the AE within 30 calendar days of the beginning of each quarter. The AE will:
 - Verify that data is complete for all families listed on the report;
 - Verify that data is accurate;
 - Compare the miscellaneous OARQ adjustments on the monthly HAP vouchers to the families listed on the quarterly report
 - Compare if the number of OARQ adjustments on the monthly vouchers match the number of families listed on the quarterly report; and
 - Compare that any FSS escrow funds forfeited by the FSS family are returned to HUD by an OARQ on the owner's monthly HAP voucher.



15

U.S. Department of Housing and Urban Development TRACS Miscellaneous Accounting Requests						Escrow Accrued June Voucher Month:	Voucher Month	Voucher Mont	Escrow Accrued September Voucher Month September	
			roject Name: oucher Date: 09/01/2016		\$0.00		\$0.00		\$295.00	0 —
Back to Query					\$382.00			· · ·	\$382.00	0 —
Sequence Number	Request Code	Request Amount	Request Comment		\$6.00				\$6.00	0 —
1	OARQ	\$295	UNIT # 1000 FSS PARTICIPANTS		\$0.00			· · ·	\$134.00	0 —
2	OARQ	\$382	UNIT		\$0.00 \$0.00				\$34.00 \$151.00	0 —
3	OARQ	\$6	UNIT #		\$11.00				\$131.00	0 —
4	OARQ	\$87	UNIT		\$0.00				\$188.00	0 —
5	OARQ	\$134	UNIT #	-	\$0.00				\$100.00	0 —
6	OARQ	\$34	UNIT		90,00)
7	OARQ	\$151	UNIT					Let T	-	
8	OARQ	\$11	UNIT							\square
9	OARQ	\$188	UNIT							
10	OARQ	\$322	UNIT							
Back to Query Back to Voucher Query Detail Options HUD Home TRACS Home St										