

March 23, 2021

Joe Carlile, Senior Advisor to the Secretary

Peggy Bailey, Senior Advisor to the Secretary

Dominique Blom, General Deputy Assistant Secretary for Public and Indian Housing

Lopa P. Kolluri, Principal Deputy Assistant Secretary for Housing

Ethan Handelman, Deputy Assistant Secretary for Multifamily Housing

U.S. Department of Housing and Urban Development

451 7th Street SW

Washington, DC 20410

Dear Mr. Carlile, Ms. Bailey, Ms. Blom, Ms. Kolluri, and Mr. Handelman,

In light of Congress' action in December 2020 to increase funding for the Family Self-Sufficiency (FSS) program to \$105 million, from a previously enacted level of \$80 million, the undersigned organizations and individuals would like to take this opportunity to share our recommendations for HUD's implementation of this increased funding. Several of these recommendations were previously submitted as part of a broader set of joint comments regarding FR-6114-P-01 (Streamlining and Implementation of Economic Growth, Regulatory Relief, and Consumer Protection Act Changes to Family Self-Sufficiency Program) in November 2020.

The group of undersigned organizations and individuals includes FSS service providers in both public housing authority and multifamily FSS programs, national and regional organizations of public housing authorities and of multifamily owners, individual multifamily owners, and a broad range of other organizations and individuals with an interest in and commitment to the FSS program. Above all, we share in a commitment to expanding access to the FSS program for the benefit of all eligible assisted households.

We encourage HUD, consistent with the Joint Explanatory Statement accompanying the FY21 Consolidated Appropriations Act, to distribute the funding made available for FY21 first to renew the full costs of the same number of full-time and part-time coordinators as were funded by FSS funding awards for FY20 at each eligible entity with an existing FSS program, with appropriate adjustments for local staffing costs and for year-to-year cost-of-living increases.

Then, the balance of funding provided for awards should be distributed to previously unfunded, new, or growing programs, and to entities that are eligible for additional coordinator funding based on their enrollment. This "second priority" funding should be apportioned approximately equally between programs administered by public housing agencies and by owners or sponsors

of a multifamily property receiving project-based rental assistance under section 8, unless there are insufficient qualifying programs in either category to allow for equal apportionment. **It is critical that a significant portion of the increased funding be allocated to previously unfunded and growing programs in order to expand access to the FSS program for eligible households.** With an increase of \$25 million in funding for the program, more families ought to be served.

Finally, we encourage HUD to utilize its authority provided in the Economic Growth Act to reserve up to 5 percent of FSS funding for use as “incentives for innovation and high performance.” Furthermore, we recommend that the authorized incentives for innovation and high performance be incorporated within a competitive funding process for allocation of funding to the “second priority” requests for new or incremental coordinator funding as described above. We note “incentive” funding under this section is not specifically restricted to use for FSS coordinators, but is more flexibly defined as “to provide support or to reward” FSS programs; and we urge HUD to employ this authority to provide support to innovative or high-performing FSS programs for costs other than coordinator costs, which could include the costs of IT systems, participant incentives, program outreach, staff training, or other costs.

Thank you for your continued support of the FSS program and for your department’s efforts in recent years to expand the program’s scope and impact. Please contact Jimmy Stuart at jstuart@compassworkingcapital.org or 857-317-3283 if you have any questions or would like to discuss these recommendations further.

Sincerely,

American Association of Service Coordinators
Baltimore Regional Housing Partnership
Beacon Communities
Boston Housing Authority
Cambridge Housing Authority
Caribou Housing Agency
Closing the Women's Wealth Gap
Community Health Councils
Council of Large Public Housing Authorities
Enterprise Community Partners
Evansville Housing Authority
Flint Housing Commission
Hallkeen Management
Housing Assistance Council

Housing Authority of the City of Old Town, ME
Housing Authority of the County of San Mateo
Housing Authority of Thurston County
Housing Partnership Network
Housing Solution for North Texas
Inclusiv
Local Initiatives Support Corporation
Low Income Investment Fund
MACDC
Mercy Housing, Inc
Metro Housing Boston
MTW Collaborative
Muskogee Housing Authority
NAHRO
National Affordable Housing Management Association
National Association of Local Housing Finance Agencies
National Council of State Housing Agencies
National Housing & Rehabilitation Association
National Housing Conference
National Housing Trust
National Leased Housing Association
National Low Income Housing Coalition
National NeighborWorks Association
Native Women Lead
New Directions
New Directions Housing Corporation
Perth Amboy Housing Authority
Piedmont Housing Alliance
POAH
Public Housing Authorities Directors Association
Related
RIHousing
Ripley County Public Housing Agency
Rockville Housing Enterprises
SAHF
Springboard To Opportunities
The Caleb Group
The New York Women's Foundation

Western Carolina Community Action
WinnCompanies

Jerethia Blake, FSS Coordinator, Jefferson County Housing Authority
Janet Boguslaw, Senior Scientist, Brandeis University
Joni Boissoneault, Self Sufficiency Program Manager, Portland Housing Authority
Kimberly Bronnbauer, Maintenance Coordinator, New Directions Housing Corp
Matt Clark, FSS coach, Bangor Housing
Reid Cramer, Senior Fellow, New America
Sharon Fletcher-Jackson, Family Self Sufficiency Caseworker, Tacoma Housing Authority
Loren Francis, FSS Coordinator, Housing Authority of the City of Hot Springs
Shundra Gichuru, FSS Coordinator, HABD
Rodrigo Guillen, FSS Coordinator, Daytona Beach Housing Authority
Taylor Guy, Director of Resident Services, New Directions Housing Corporation
Jasmine Henry, FSS Coordinator, Housing Authority of the City of Wilmington
Client Services Manager, Salem Housing Authority
Cathy Kent, Family Self-Sufficiency Coordinator, Wilson Housing Authority
Dorothy M. Maddox, FSS Coordinator, Daytona Beach Housing Authority
Jennifer Maynor, FSS Coordinator, Western Carolina Community Action
Matt McGee, Project Manager, New Directions
Joshua McKie, FSS Coordinator, Housing Authority of the City of Fort Myers
Telesha Mervin, Director, Community Schools/City of Cambridge
Karen Netter, PH FSS Coordinator, Chillicothe Metropolitan Housing Authority
Sophia Pedraza, Family Self Sufficiency and Homeownership Coordinator, TCOG
Sharrell Price-White, FSS/ROSS Manager , Housing Authority of the City of Pittsburgh
George Sanders, Chief Impact Officer, New Directions Housing Corp
Heidi Semenek, Director of FSS & Special Programs, Lake County Housing Authority
Cindy Showalter, FSS coordinator, Union County Housing Authority
Natalie Smith-Wells, COO, Housing Authority of the City of Daytona Beach
David Snyder, Chief Development Officer, New Directions
Cherie Storey, HCV FSS Coordinator, Beaumont Housing Authority
Madeligne Tena, Financial Coaching Manager, Compass Working Capital
Derek Turner, Director of Maintenance, New directions
Christine Welton, FSS Coordinator, Housing Authority City of Fort Myers
Shanike R. Williams, First time homebuyer, Boston housing

CC: Anice Chenault, Toby Halliday, Jen Lavorel, Bob Mulderig