

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](mailto: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 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  
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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  
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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