

Multifamily Family Self_Sufficiency (MF FSS) Program - Drafting Table Response Worksheet

	Housing Partnership Network on behalf of: Stewards of Affordable Housing for the Future, POAH, Caleb Group, The Community Builders, National Housing Trust, Compass Working Capital, and National Housing Conference
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Type of Company/Business Interest:	nonprofit

Instructions

1. Provide only one set of comments per entity.
2. Provide the Type of Company/Business Interest - for example, Housing Owner, Trade Association, 3rd Party Professional.
3. In the "Section" column, you may put the word General if you are commenting on something that is not page specific. General can address usability, structure, and any overall comments you might have.
4. Please provide only the page number of the first page you are referencing. This will make it easy to group and sort.
5. Please provide only the line number of the first line you are referencing. This will make it easy to group and sort.

Feedback Number	Section	Page Number	Line Number	Feedback
1	General			We encourage HUD to seek Congressional Action to make the extension of PBRA to FSS made permanent, rather than subject to annual appropriations. Absent Congressional action, HUD should articulate a policy that protects tenants' escrow if the program goes away.
2	General			We commend HUD for allowing the use of residual receipts to fund FSS service coordinators, but we note that it is not universal solution to the problem of funding for service coordination. The distribution of residual receipts across the portfolio is idiosyncratic and may not align with PBRA owners with the capacity to run good FSS programs.
3	Term of CoP	15	590	HUD should articulate a policy that binds a future owner of a PBRA unit to the terms of a Contract of Participation of an FSS participant in good standing. Just as tenants are protected when owners sell or exit, FSS should be a durable component of the family's housing assistance.
4	Term of CoP	15	603	The requirement for an additional recertification for a family entering FSS if their last recertification was more than 120 days ago is an unnecessary administrative burden on owners who are not receiving any additional HUD funds to run this program. Owners of properties receiving project-based Section 8 assistance are already required to recertify tenants for all but negligible increases in income, and this requirement is more than sufficient to ensure that records reflect current tenant incomes.
5	Certification of coordination	8	324	It is burdensome and unnecessary to require owners who are not receiving any administrative funds to run the program to produce a certification that the FSS program will be coordinated with local employment, child care, training and education programs. This seems to be a paperwork burden to track down the names of the programs and the agencies administering them that doesn't serve a useful purpose. The lack of dedicated funding will give owners every incentive to coordinate where feasible, so this requirement seems unnecessary.

<i>Correct Example</i>	7.1	1	27	<i>Need reference or definition of "medium to high risk transaction"</i> EXAMPLE
	Chap. 8	General	General	<i>References to secondary financing terms are inconsistent with recent guidance for the program</i> EXAMPLE
<i>Incorrect Example</i>	2.6 - 3.2	15-30	30-75	<i>The definitions of a few programs conflicts with other guidance</i> EXAMPLE