



# **PIERCE COUNTY HOUSING AUTHORITY**

603 South Polk Street, Tacoma, WA 98444 | 253-620-5400

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## **INFORMATION PACKET FOR THE BOARD OF COMMISSIONERS' REGULAR MEETING**

**HYBRID BUILDING B/ZOOM  
WEDNESDAY, SEPTEMBER 28, 2022, 3:30 PM**



## PIERCE COUNTY HOUSING AUTHORITY

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# AGENDA FOR THE REGULAR MEETING OF THE BOARD OF COMMISSIONERS

Wednesday, September 28<sup>th</sup>, 2022

Location: PCHA Building B & Online Via Zoom

Time: 3:30 PM

1. ROLL CALL
2. PUBLIC COMMENT – Five (5) Minutes Per Speaker
3. OLD BUSINESS
  - a. Consider a Motion Approving the Minutes for the Regular Board Meeting Held on July 27, 2022.....4
  - b. Consider a Motion Approving Cash Disbursements Totaling \$3,761,361.44 for the Month of August.....8
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7. COMMISSIONER’S CORNER
8. EXECUTIVE SESSION IF NEEDED

The Board may hold an executive session for purposes allowed under the Open Public Meetings Act.

Legal purposes include: to consider acquisition or sale of real estate; to review negotiations of publicly bid contracts; to receive and evaluate complaints or charges brought against a public officer or employee; to evaluate the qualifications of an applicant for public employment; to review the performance of a public employee; and to discuss with legal counsel matters relating to agency enforcement actions, litigation, or potential litigation. Before convening in executive session, the Board Chair will publicly announce the purpose for the executive session and the time when the executive session is expected to conclude.

Under RCW 42.30.110, an executive session may be held for the purpose of receiving and evaluating complaints against or reviewing the qualifications of an applicant for public employment or reviewing the performance of a public employee;

consultation with legal counsel regarding agency enforcement actions, or actual or potential agency litigation; considering the sale or acquisition of real estate; and/or reviewing professional negotiations.

9. ADJOURNMENT

The Pierce County Housing Authority Board of Commissioner will hold its meetings to ensure essential Housing Authority functions continue, however due to Governor Inslee's [Emergency Proclamation 20-25 Stay Home – Stay Healthy](#) issued on March 23, 2020, in-person attendance by members of the public is NOT permitted at this time.

During this public health emergency, we will only accept public comment at [Director@pchawa.org](mailto:Director@pchawa.org). Submit public comments any time before the Board of Commissioner's meeting adjourns. All written comments will be part of the record. If you make public comments before noon on the day of the Board meeting, Board members will receive them prior to the meeting.



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## **OLD BUSINESS**



## PIERCE COUNTY HOUSING AUTHORITY

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### MINUTES FOR THE REGULAR MEETING OF THE BOARD OF COMMISSIONERS

Date: Wednesday, August 24, 2022

Location: Via Zoom

In Attendance: Vice Chairperson Narva Walton (Acting Chairperson)  
Commissioner Miller  
Commissioner Stewart

Also in Attendance: Jim Stretz, Executive Director  
Moreen Forde, Acting Chief Financial Officer  
Tina McLeod, Director of Operations  
Sean McKenna, Director of Project Management  
Tamara Meade, Director of Supported Housing Programs  
Riley Guerrero, Administrative Assistant  
Christine Smith, CPA

Acting Chairperson Walton called the meeting to order at 3:34 PM.

#### PUBLIC COMMENT

Vice Chairperson Walton asked for public comment.

There was no public comment.

#### OLD BUSINESS

Acting Chairperson Walton asked the Board to consider a motion approving the minutes of the regular board meeting held on July 27<sup>th</sup>, 2022, with the comment that a spelling correction would be made. Commissioner Stewart so moved. Commissioner Miller abstained as he was not present for the aforementioned meeting.

	In Favor	Opposed	Abstain	Absent
Commissioner Blaksley	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Commissioner Miller	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Commissioner Stewart	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vice Chairperson Walton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chairperson Martinez	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There were no disbursements to report for the month of July as the accounting transition has meant that the books have not yet been closed. Executive Director Jim Stretz introduced Christine Smith of Theresa Johnson Accounting to the Board.

## NEW BUSINESS

Acting Chairperson Walton asked for a motion to approve Resolution 1916, to extend the 2020-2021 Cost Allocation Plan into 2022. Commissioner Miller so moved. Commissioner Stewart seconded the motion.

	In Favor	Opposed	Abstain	Absent
Commissioner Blaksley	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Commissioner Miller	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commissioner Stewart	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vice Chairperson Walton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chairperson Martinez	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Board reviewed Resolution 1917, to approve the negotiated sale at appraised value of scattered-site public housing units to keep the units affordable. Stretz briefed the Board as to the goal being to keep the homes as affordable housing rather than losing them to flippers and landlords. Using an example that the estimated premium if sold to the highest bidder could not build 128 units of affordable units that could be lost. Commissioner Stewart asked if it was legal to prioritize non-profit buyers. Executive Director Stretz answered in the affirmative, citing the same action taken by Everett Housing Authority, and deferred to the Director of Project Management. Director McKenna reaffirmed. Commissioner Miller voiced objections to selling at negotiated at appraised value rather than highest offer and from prospective for-profit buyers as a class. He stated that he thought the fix was on to sell to a specific non-profit. Director Stretz stated that a local affordable housing non-profit has had an interest in buying the homes for over 5 years. Commissioner Miller asked if any commitments were made to a specific non-profit that he believed is politically powerful, Stretz answered in the negative. Miller challenged that the preference might look bad to the public and also questioned the legality, requesting a legal opinion. Executive Director Stretz stated PCHA would seek legal opinion affirm. Commissioner Stewart moved that Resolution 1917 be accepted, pending addition legal review. Commissioner Miller seconded the motion.

	In Favor	Opposed	Abstain	Absent
Commissioner Blaksley	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Commissioner Miller	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commissioner Stewart	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vice Chairperson Walton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chairperson Martinez	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Commissioner Miller stated his opposition to a perceived pre-conceived deal with non-profit organizations and inquired as to the agency's position in the event of a large number of unanticipated low-income buyers seeking to purchase homes. Executive Director Stretz answered that it was in the mission of the housing authority to provide affordable housing, which would be best preserved in perpetuity through a nonprofit organization. Vice Chairperson Walton inquired about the overall

direction of the authority. Commissioner Miller inquired as to the publication of the current strategy. Commissioner Stewart asked Commissioner Miller for suggestions on how it would best be phrased if publicized.

No new staff were present, but two Assistant Property Managers began under the Director of Operations Tina McLeod.

## **REPORTS**

Acting CFO Moreen Forde delivered her financial report. Commissioner Stewart inquired as to the overages listed. Acting CFO Forde clarified that these were in HAP, Recertifications, retroactive rent increases, and similar expenses. She also clarified that under-budget results in Central Administration were due to vacant positions.

Director of Operations Christina McLeod delivered her oral report. She detailed recruitment efforts, re-registration of residents, and ongoing work in the Yardi transition, as well as current eviction proceedings. Acting Chairperson Walton inquired as to the nature of two PBV evictions. Director McLeod answered that one was due to a transition out of the program holding the voucher for the unit, and that the other refused the services that were required to remain on the program and therefore the voucher was voided. Commissioner Stewart inquired as to the nature of the staffing positions being filled. Director McLeod answered that the positions were previously existing but had not been filled for an extended period of time. Acting Chairperson Walton inquired as to whether exit interviews were regularly conducted. Director McLeod answered that there had been three exits within the last year, two of which were voluntary, and both for the employee to pursue responsibilities outside of their professional careers.

Director of Maintenance Victor Lovelace delivered his oral report as detailed in the Board Packet. This included a discussion of various work orders completed at multiple PCHA properties, as well as ongoing large-scale projects. Commissioner Stewart inquired as to whether these maintenance orders were completed in-house. Director Lovelace answered that all regular maintenance work orders were completed in-house, but orders that required a highly specialized skill set, such as roofing orders, were subcontracted. Commissioner Stewart further inquired as to whether inspections of PCHA units took place. Director McLeod answered that they did, although COVID-era legislation barring inspections only recently lifted, creating a backlog for property management staff. Acting Chairperson Walton inquired as to the ratio of work orders at a particular property, and the tracking of tenant responsibility in damages. Director Lovelace offered to bring the statistics to a subsequent board meeting.

Director of Project Management Sean McKenna delivered his oral report as detailed in the Board Packet. He detailed the development of a Request for Proposals in the disposition of scattered site parcels to ensure the fair and equitable selection of a buyer, and that FSS and Homeownership program participants were being contacted to ensure all steps are taken to give them first priority in buying homes, as well as independently qualified low-income buyers, but stressed the difficulty in low-income buyers finding independent financing. Commissioner Stewart asked for an update on the consolidation of staff to the 108<sup>th</sup> street campus. Director McKenna announced an upcoming meeting with the county for pre-application on remodeling the site, as well as the potential to acquire an adjacent parcel owned by a local water utility.

Director of Supported Housing Tamara Meade delivered her oral report as provided in the Board Packet. She focused on the Yardi conversion as well as the recent successes in the VASH program, with 75% Voucher utilization, with the primary obstacle to greater utilization rates being the lack of housing stock. HUD will be providing PCHA with a letter of support to receive more VASH Vouchers. EHV's have also improved to 65% utilization. Commissioner Stewart inquired, if 60 housing opportunities opened, how many veterans could be housed immediately. Director Meade answered that all 60 spots could be filled immediately.

Executive Director Jim Stretz delivered his oral report. He announced a potential RFP for project-based vouchers on a tiny home village or similar project would be coming soon. He updated the commissioners on the progress of the annual State Auditor's Office review of the previous fiscal year, and shared that the auditor expected to release any findings by the end of September. Commissioner Stewart inquired as to the recommendations of a previous consultant. Executive Director Stretz shared the recommendation from the consultant that to attract a permanent CFO, PCHA's salary range would need to be increased by 40%. Commissioner Stewart further inquired as to the findings of recent audits with respect to the fraud committed by previous CFO Cova Hunter. Executive Director Stretz assured the Board that they would receive the information as soon as it became available.

### STUDY SESSION

No Study Session was called; however, Director McKenna informed the Board that the Five-Year Plan was soon to be renewed, and future meetings would involve study sessions and strategic planning.

### COMMISSIONER'S CORNER

Commissioner Miller asked if future board meetings could be focused on strategic issues, as he previously requested. Acting Chairperson Walton and Commissioner Stewart concurred. Commissioner Stewart thanked the Directors for their reports, but stated that he often found the information delivered can be absorbed from reading their written report. Acting Chairperson Walton suggested that the practice of receiving written reports in advance of the meeting continue, and then Board Members could bring their questions to the Directors during the meetings. Acting Chairperson Walton also asked that a list of items of strategic importance be sent to the Board prior to the next meeting.

Commissioner Stewart inquired as to the recent invitation of the Board to the NAHRO conference in San Diego. Executive Director Stretz answered that the Board had attended in the past. Commissioner Miller suggested that if the Board were to attend, a staff member should also attend, to reinforce their learning.

### EXECUTIVE SESSION

No Executive Session was called.

The meeting was adjourned at 5:19 PM.





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**CASH DISBURSEMENTS**

Check Register provided to Board omitted to protect privacy of residents and landlords.



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## **NEW BUSINESS**



## PIERCE COUNTY HOUSING AUTHORITY

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### RESOLUTION 1918

ADOPTING AN AMENDED FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN FOR SECTION 8 HOUSING CHOICE VOUCHER PROGRAMS AND LOW INCOME PUBLIC HOUSING PROGRAMS

WHEREAS, the Pierce County Housing Authority (the “Authority”) adopted an amended Family Self-Sufficiency Program Action Plan for Section 8 Voucher in June of 2019 and:

WHEREAS, the current Action Plan is outdated and;

WHEREAS, the current Action Plan is in need of revision to include additional detail on program operations;

NOW, THEREFORE BE IT RESOLVED that the amended Family Self-Sufficiency Action Plan for Section 8 Housing Choice Vouchers Programs and Low Income Public Housing Programs be adopted to become effective immediately.

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Signature of the Chair of the Board

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Date

---

Signature of the Executive Director

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Date



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### **APPENDIX A: SUPPORTING DOCUMENTS FOR RESOLUTION 1918 ADOPTING AN AMENDED FAMILY SELF-SUFFICIENCY PROGRAM ACTION PLAN**

**FSS ACTION PLAN**  
**FOR THE**  
**FAMILY SELF-SUFFICIENCY PROGRAM**

July 1, 2022

Revision Date	Revision Date
March 1, 2003	
June 1, 2019	
September 1, 2022	



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**FSS Action Plan  
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## **Chapter 1**

### **THE FAMILY SELF-SUFFICIENCY PROGRAM AND THE FSS ACTION PLAN**

#### **INTRODUCTION**

This chapter provides an overview of the family self-sufficiency (FSS) program and FSS action plan, including the purpose, organization, and required contents of the FSS action plan.

Part I: The Family Self-Sufficiency (FSS) Program and FSS Action Plan: This part provides an overview of the family self-sufficiency program and the purpose of the FSS action plan.

Part II: Requirements of the FSS Action Plan: This part covers action plan requirements, including development, revision, and contents of the action plan. It also contains information on family demographics, which is part of the required contents of the action plan.

#### **PART I: THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM AND FSS ACTION PLAN**

##### **1-I.A. OVERVIEW OF THE FAMILY SELF-SUFFICIENCY PROGRAM**

The origins of the FSS program are in two pilot projects implemented in 1986 and 1990, Project Self-Sufficiency and Operation Bootstrap, respectively. These projects were set up to test self-sufficiency programs for families with housing subsidies, and both demonstrated that families needed essential services to move toward economic self-sufficiency. These services include child care, transportation, medical care, and long-term education and training.

In the wake of the successful demonstration of these projects, family self-sufficiency became one of the initiatives under the Homeownership and Housing Opportunities for People Everywhere (HOPE) program enacted in 1990, and the FSS program was subsequently created under the National Affordable Housing Act the same year.

FSS built upon and refined both Project Self-Sufficiency and the Bootstrap program. It remained a voluntary program in 1991 and 1992 but became mandatory in 1993 for any new increments of funding issued to PHAs. The 1993 regulations were further modified by the Quality Housing and Work Responsibility Act of 1998 (QHWRA). In 2018, expansive changes were made to the FSS program by the Economic Growth, Regulatory Relief, and Consumer Protection Act known as “the Economic Growth Act” or “the Act.”

The purpose of the FSS program is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. The purpose and basic requirements of the FSS program are further elaborated upon in Chapter 2.

This family self-sufficiency program is administered by the **Pierce County Housing Authority** for the jurisdiction of **County of Pierce, WA**.

### **1-I.B. APPLICABLE REGULATIONS**

Applicable regulations for Section 8 and public housing FSS programs include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 902: Public Housing Assessment System
- 24 CFR Part 903: Public Housing Agency Plans
- 24 CFR Part 945: Designated Housing
- 24 CFR Part 960: Public Housing Admission and Occupancy Policies
- 24 CFR Part 965: PHA-Owned or Leased Projects—General Provisions
- 24 CFR Part 966: Public Housing Lease and Grievance Procedures
- 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- 24 CFR Part 984: Section 8 and Public Housing Family Self-Sufficiency Program

### **1-I.C. THE FAMILY SELF-SUFFICIENCY ACTION PLAN**

The family self-sufficiency (FSS) action plan is required by HUD. The purpose of the FSS action plan is to establish policies for conducting the family self-sufficiency program in a manner consistent with HUD requirements and local goals and objectives contained in the PHA's Agency Plan. This FSS action plan is a supporting document to the PHA Agency Plan and is available for public review as required by 24 CFR Part 903.

This family self-sufficiency action plan is set forth to define the PHA's local policies for operation of the program in the context of federal laws and regulations. All issues related to FSS not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable laws. The policies in this FSS action plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

The PHA is responsible for complying with all changes in HUD regulations pertaining to the FSS program. If such changes conflict with this plan, HUD regulations will take precedence.

Administration of the FSS program and the functions and responsibilities of PHA staff shall comply with the PHA's personnel policy and HUD's family self-sufficiency regulations, as well as all Section 8 and public housing regulations, in addition to federal, state, and local fair housing laws and regulations.

## **PART II: REQUIREMENTS OF THE FSS ACTION PLAN**

### **1-II.A. OVERVIEW**

A PHA must have a HUD-approved action plan before implementing an FSS program, regardless of whether the FSS program is a mandatory or voluntary program. Further, this action plan must comply with the requirements specified for the plan in the regulations [24 CFR 984.201(a)].

The regulatory requirements dealing specifically with the FSS action plan itself largely involve the development, revision, and required contents of the action plan. This part covers those requirements.

### **1-II.B. HUD APPROACH TO POLICY DEVELOPMENT**

In developing policy for the FSS action plan, PHAs need to be aware of the distinction HUD makes between mandatory and discretionary policies.

- *Mandatory policies* are those driven by legislation, regulations, current handbooks, notices, and legal opinions.
- *Discretionary policies* consist of those developed for areas in which the PHA has regulatory discretion, or regarding optional, nonbinding guidance including guidebooks, notices that have expired, and recommendations from individual HUD staff.

HUD expects PHAs to develop policies and procedures that are consistent with mandatory regulations and to make clear the optional policies the PHA has adopted. The PHA's FSS action plan is the foundation of those policies and procedures for the FSS program. HUD's directions require PHAs to make policy choices that provide guidance to staff and consistency to program applicants and participants.

Following HUD guidance, even though it is not mandatory, provides a PHA with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If a PHA adopts an alternative strategy, it must make its own determination that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's safe harbor, but PHAs should carefully consider those decisions.



## **1-II.C. FSS ACTION PLAN DEVELOPMENT AND REVISION**

### **Development of Action Plan [24 CFR 984.201(b) and (c)]**

When developing an FSS action plan, a PHA must do so in consultation with the chief executive officer of the applicable unit of general local government and the program coordinating committee (PCC).

For all voluntary or mandatory FSS programs, the PHA must submit its action plan and obtain HUD approval of the plan before it can implement the FSS program. This includes a voluntary program established because the PHA chose to implement an FSS program that exceeds the minimum size for a mandatory program (see Section 2-II.A. for a discussion of mandatory versus voluntary FSS programs).

### **Single Action Plan [24 CFR 984.201(f)]**

PHAs implementing both a Section 8 FSS program and a public or Indian housing FSS program may submit one action plan. In cases where the PHA decides to submit one plan for more than one program, the policies contained in the action plan would apply to both programs.

#### PCHA Policy

PCHA is implementing both a public housing and Section 8 FSS program, which may include tenant-based and project-based Section 8, HCV Homeownership, Moderate Rehabilitation, Moderate Rehabilitation Single Room Occupancy, Family Unification Program (FUP), and Foster Youth to Independence Initiative (FYI). The PHA will submit one action plan, the policies in which apply to both programs.

### **Revision to the FSS Action Plan [24 CFR 984.201(c)(2)]**

Following HUD's initial approval of the action plan, no further approval of the action plan is required unless the PHA proposes to make policy changes to the action plan, increase the size of a voluntary program, or revise the FSS action plan as needed to comply with changes in HUD regulations. The PHA must submit any changes to the action plan to HUD for approval.

#### PCHA Policy

PCHA will review and update the action plan at least once a year, and more often if needed, to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

## **1-II.D. CONTENTS OF THE PLAN [24CFR 984.201(d)]**

HUD regulations state that there are several components that must be included in the FSS action plan. At a minimum, the action plan must cover the policies and procedures of the PHA for operation of a local FSS program as follows:

- Family demographics, including a description of the number, size, characteristics, and other demographics such as racial and ethnic data, in addition to the supportive service needs of the families expected to participate in the program. (Chapter 1)
- Estimate of participating families, which means the number of families which can reasonably be expected to receive supportive services under the FSS program. (Chapter 2)
- Eligible families from any other local self-sufficiency program who are expected to agree to executing an FSS contract of participation. (Chapter 2)
- A statement of the PHA's FSS family selection procedures, including a description of how the procedures ensure that families are selected without regard to race, color, religion, disability, sex, familial status, or national origin. (Chapter 4)
- A description of the incentives that the PHA intends to offer to families to encourage participation in the FSS program (an incentives plan), including the establishment of the escrow account. (Chapter 4)
- Outreach efforts, which include a description of the PHA's efforts to recruit eligible families, the actions the PHA will take to ensure that both minority and nonminority groups are informed about the FSS program, and how the PHA will make this information known. (Chapter 4)
- A description of the FSS activities and supportive services to be provided by both public and private resources to FSS families, and identification of these public and private resources. (Chapter 4)
- A description of the PHA's method for identifying family support needs, including how the PHA will identify the needs and deliver the services. (Chapter 4)
- A description of the PHA's policies regarding program termination or withholding of services based on a family's failure to comply with the FSS contract, and available grievance procedures. (Chapter 5)
- Assurances of noninterference with rights of non-participating families which state that a family's election to not participate in the FSS program will not affect the family's admission to the Section 8 or public housing program, nor will it affect their right to occupancy in accordance with its lease. (Chapter 4)
- A timetable for implementation of the FSS program, including the schedule for filling FSS slots with eligible FSS families. (Chapter 2)

- A certification that development of the services and activities under the FSS program has been coordinated with programs under Title I of the Workforce Innovation and Opportunity Act, other relevant employment, childcare, transportation, training, education, and financial empowerment programs in the area, and will continue to be coordinated to avoid duplication of services and activities.

**Optional Additional Information [24 CFR 984.201(d)(13)].**

- HUD encourages additional information in the action plan that would help to determine the soundness of the PHAs proposed FSS program.

PHA Policy

The PHA will submit additional optional information in this action plan that will help HUD determine the soundness of the proposed FSS program.

This information includes:

Policies related to the modification of goals in the ITSP. (Chapter 5)

Policies on the circumstances in which an extension of the contract of participation may be granted. (Chapter 5)

Policies on the interim disbursement of escrow, including any limitations on the use of the funds. (Chapter 6)

Policies regarding eligible uses of forfeited escrow funds by families in good standing. (Chapter 6)

Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating. (Chapter 4)

Policies on requirements for documentation for goal completion. (Chapter 4)

Policies on documentation of the household's designation of the "head of FSS family." (Chapter 4)

Policies for providing an FSS selection preference for porting families if the PHA elects to offer such a preference. (Chapter 7)

### 1-II.E. FAMILY DEMOGRAPHICS [24 CFR 984.201(d)(1)]

As part of the required contents of the FSS action plan, family demographics of the Section 8 and public housing program participants serve to provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants). These data may later be used to help the housing authority and the program coordinating committee (PCC) to identify supportive service needs of the families expected to participate in the FSS program.

#### PHA Policy

<b>Section 8 and Public Housing</b>	<b>Total Families</b>	<b>Percent of Total</b>
<b>All Families</b>	<b>208</b>	<b>100</b>
Single	195	94
Female HOH	199	96
Male HOH	9	4
<b>Race</b>		
White	104	50
Black/African American	100	48
American Indian/Alaska Native	1	>1
Asian	1	>1
Native Hawaiian/Other Pacific Islander	2	1
<b>Ethnicity</b>		
Hispanic or Latino	4	1
Not Hispanic or Latino	204	99
<b>Income</b>		
Extremely Low-Income	193	93
Very Low-Income	10	5
Low-Income	5	2
HOH Income from Wages	26	13
Other Member Income from Wages	4	
HOH Income from TANF	6	3
Other Member Income from TANF	0	0
HOH Income from SSI	45	22
Other Member Income from SSI	18	7

<b>Number of Children</b>		
0	39	19
1-2	11	5
3-4	15	7
5 or more	3	
<b>Total Number of Family Members</b>		
1-2	38	18
3-4	125	61
5 or more	45	21
<b>Persons with Disabilities</b>		
HOH Person w/ Disabilities (HUD)	38	18
Family Members w/ Disabilities	9	4

## Chapter 2

### PURPOSE, SCOPE, AND APPLICABILITY OF THE FAMILY SELF-SUFFICIENCY PROGRAM

#### INTRODUCTION

This chapter contains information about the FSS program's purpose, size, and measurable objectives as well as information on program operation. This includes potential participant demographics, the program timetable, the number of families to be served, and the size of the PHA's voluntary FSS program. This chapter also contains definitions of the key terms in this FSS action plan.

Part I: The Purpose and Basic Requirements of the FSS program: This part includes a description of the purpose of the FSS program on a national level—its intent, goal, and major strategies.

Part II: The Scope of the FSS program: This part contains information about housing assistance programs eligible to participate in FSS, the size of the PHA's FSS program, an estimate of participating families, eligible families from other self-sufficiency programs, and eligibility for combined FSS programs.

Part III: Program Operation: This part specifies the requirements for FSS program operation, including voluntary FSS program implementation.

Part IV: The Definitions of Terms Used in the PHA's FSS program: This section contains both HUD and PHA definitions for terms used in this policy document.



## **PART I: PURPOSE AND BASIC REQUIREMENTS OF THE FSS PROGRAM**

### **2-I.A. PURPOSE**

The purpose of the family self-sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of Section 8 and public housing assistance programs with public and private resources enabling families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency [984.101(a)(1)].

In addition to this broader national goal of the FSS program, the PHA also establishes a local goal consistent with the PHA's mission statement to serve as a guide for establishing policy and implementing the FSS program.

#### PCHA Policy

PCHA's local goal in operating this FSS program is to match housing-assisted families with a broad range of highly collaborative existing community services to assist FSS families in achieving economic self-sufficiency. *Economic self-sufficiency* is defined as having the sustainable skills necessary to maintain employment paying a "living wage." This wage would pay for the family's basic needs without the use of government subsidies.

### **2-I.B. PROGRAM OBJECTIVES [24 CFR 984.102]**

In order to reach the FSS national program goal, HUD has defined its FSS program objective as to reduce the dependency of low-income families on welfare assistance and on housing subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling, and other forms of social service assistance while living in assisted housing so that they may obtain the education, employment, business and social skills necessary to achieve self-sufficiency. As with the goals of the program, FSS program objectives are defined on the national level through FSS regulation, and on the local level by PHA policy.

#### PCHA Policy

On the local level, PCHA will achieve the national program objective by offering low-income families a broad range of services through partnering with the program coordinating committee (PCC). These services will provide long-term education, job training, counseling, and other forms of social service assistance so that families may achieve economic self-sufficiency, as defined in Section 2-I.A. of this document.

### **2-I.C. BASIC REQUIREMENTS OF THE FSS PROGRAM [24 CFR 984.104]**

An FSS program established under 24 CFR Part 984 must operate in conformity with the regulations and this FSS action plan (as required in 24 CFR 984.201, provide comprehensive supportive services as defined in 24 CFR 984.103, and operate in compliance with nondiscrimination and equal opportunity requirements.





## **PART II: SCOPE OF THE FSS PROGRAM**

### **2-II.A. HOUSING-ASSISTED FAMILIES ELIGIBLE TO PARTICIPATE IN FSS**

**The Section 8 and public housing programs through which families are eligible to participate in the FSS program was expanded by the 2018 Economic Growth Act to allow participants in HCV Homeownership, Moderate Rehabilitation, Moderate Rehabilitation Single Room Occupancy, and Family Unification Program (FUP), including the Foster Youth to Independence (FYI) Initiative.**

### **2-II.B. PHAs REQUIRED TO OPERATE AN FSS PROGRAM**

Each PHA that received funding for public housing units under the FY 1991 and FY 1992 FSS incentive award competitions must operate a public housing FSS program. Each PHA that received funding for Section 8 rental certificates or vouchers under the combined FY 1991/1992 FSS incentive award competition also must operate a Section 8 FSS program.

In addition, unless the PHA receives an exemption under 24 CFR 984.105, each PHA for which HUD reserved funding (budget authority) for additional rental certificates or vouchers in FY 1993 through October 20, 1998, must operate a Section 8 FSS program. Each PHA for which HUD reserved funding (budget authority) to acquire or construct additional public housing units in FY 1993 through October 20, 1998, must operate a public housing FSS program as well.

Every PHA that was required to administer an FSS program on May 24, 2018 (the enactment date of the Economic Growth, Regulatory Relief, and Consumer Protection Act) must continue to operate that FSS program for the total number of families determined by HUD on that date unless the PHA receives an exception as described in 24 CFR 984.105(d).

#### **Mandatory Minimum Program Size (MMPS) [24 CFR 984.105]**

PHAs that are required to operate an FSS program under 24 CFR 984.101 are subject to a minimum program size requirement.

##### **PCHA Minimum Program Size**

**As determined by HUD as of May 24, 2018, *PCHA's combined housing choice voucher and public housing program FSS MMPS is 170. All mandatory slots were filled as of 2015. PCHA is operating a voluntary FSS program.***

### ***Maintaining Mandatory Minimum Program Size***

Although the discretion to do so ultimately rests with the PHA, mandatory minimum program size can decrease as FSS participants successfully complete the program. Per the regulation, for each family that completes the program by fulfilling its FSS contract of participation on or after May 24, 2018, the mandatory minimum program size for a PHA's FSS program is reduced by one slot. However, if an FSS slot is vacated by a family that has not completed its FSS contract of participation obligations, the slot must be filled by a replacement family which has been selected in accordance with the FSS family selection procedures [24 CFR 984.105(b)(2)].

#### **PHA Policy**

PCHA has reduced the FSS mandatory minimum program size by one for each family that graduated from the program by fulfilling its FSS contract of participation and has met its obligations with no further slots to report.

### ***Option to Operate Larger FSS Program***

A PHA may choose to operate an FSS program of a larger size than the minimum required by HUD [24 CFR 984.105(a)(3)].

#### **PHA Policy**

PCHA will not operate an FSS program of a larger size than its mandatory minimum program size.

### ***Exception to Program Operation [24 CFR 984.105(c)]***

The requirement to establish and carry out an FSS program may be waived with approval from HUD. In order to waive the requirement, the PHA must provide a certification to HUD that the establishment and operation of an FSS program is not feasible because of a lack of accessible supportive services funding, a lack of the availability of programs under the Workforce Innovation and Opportunity Act, a lack of funding for reasonable administrative costs, a lack of cooperation by other units of state or local government, or a lack of interest in participating in the FSS program on the part of eligible families.

An exception will not be granted if HUD determines that local circumstances do not preclude the PHA from effectively operating an FSS program that is smaller than the minimum program size.

### ***Reduction in Program Size***

Rather than a full exception to program operation, a PHA may also be permitted to operate an FSS program that is smaller than the minimum program size. As with the full exception, HUD may grant the PHA such a partial exception if the PHA provides to HUD a certification that the operation of an FSS program of the minimum program size is not feasible because of a decrease in or lack of accessible supportive services [24 CFR 984.105(d)].

### ***Expiration of Exception***

The approval for a full or partial exception to the FSS minimum program size requirement expires five years from the date of HUD approval of the exception. If a PHA seeks to continue an exception after its expiration, the PHA must submit a new request and a new certification to HUD for consideration [24 CFR 984.105(e)].

### **2-II.C. COOPERATIVE AGREEMENTS [24 CFR 984.106]**

**A PHA may enter into a Cooperative Agreement with one or more multifamily-assisted housing owners to voluntarily make the PHA's FSS program available to the owner's housing tenants. The Cooperative Agreement must include all the requirements for such agreements found in 24 CFR 984.106 and 24 CFR 887.107.**

#### **PCHA Policy**

**PCHA will not enter into a Cooperative Agreement with one or more multifamily-assisted housing owners.**

### **2-II.D. ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)]**

The PHA must state the number of eligible FSS families who can reasonably be expected to receive supportive services under the FSS program based on available and anticipated federal, tribal, state, local, and private resources.

#### **PHA Policy**

**125** eligible FSS families can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated federal, tribal, state, local, and private resources.

### **2-II.E. ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201(d)(3)]**

If applicable, the PHA must enter the number of families, by program type, who are participating in any other local housing self-sufficiency program who are expected to agree to execute an FSS contract of participation.

#### **PHA Policy**

PCHA does not operate other self-sufficiency programs and therefore no additional families from other programs are expected to execute an FSS contract of participation.

## **2-II.F. ELIGIBILITY OF A COMBINED PROGRAM [24 CFR 984.201(e)]**

A PHA that wishes to operate a joint FSS program with other PHAs or owners of multifamily-assisted housing may combine its resources with one or more of these entities to deliver supportive services under a joint action plan that will provide for the establishment and operation of a combined FSS program that meets the requirements of this part.

### **PHA Policy**

PCHA will not combine its resources with any other PHA to deliver support services, have a joint action plan, or establish or operate a combined FSS Program.

## **PART III: PROGRAM OPERATION**

### **2-III.A. OVERVIEW**

Federal regulations specify requirements for FSS program operation regarding deadlines for program start-up and when the PHA is expected to have attained full enrollment. A timetable illustrating when the PHA intends to meet these deadlines is included as part of the required contents of the action plan.

### **2-III.B. PROGRAM IMPLEMENTATION DEADLINE**

The deadlines for program implementation differ depending on whether the FSS program is voluntary or mandatory.

#### **Voluntary Program [24 CFR 984.301(a)]**

There is no deadline for implementation of a voluntary program. However, a voluntary program may not be implemented before the requirements specified in 24 CFR 984.201 have been satisfied (see Sections 1-II.A.–1-II.D.).

## **2-III.C. TIMETABLE FOR PROGRAM IMPLEMENTATION [24 CFR 984.201(d)(13)]**

A timetable for implementation of the FSS program is part of the required contents of the FSS action plan.

### PHA Policy

For voluntary programs, the PHA will implement the FSS program within one year from the date of approval of either the FSS action plan by the HUD field office, or within the time identified in the applicable FSS funding contract with HUD.

For mandatory FSS programs, the PHA has the obligation to continue to fill their mandatory FSS slots effective May 24, 2018, as determined by the HUD field office.

The PHA will implement its FSS program according to the following timetable:

<b>Activity</b>	<b>Month and Date</b>
Establish PCC	March 1994
Conduct Program Needs Assessment	March 1994 and annually thereafter
Resource Identification	March 1994 and ongoing
Establish Policies	March 1994 and annual review and revision
Design Service Delivery	March 1994 and annual review and revision
Develop Administrative Procedures	March 1994 and annual review and revision
Begin Service Delivery	March 1994
Conduct Outreach	March 1994 and ongoing
Conduct Orientations	March 1994 and ongoing
Conduct Individual Needs Assessment	March 1994 and ongoing
Begin Contracting	March 1994 and ongoing
Complete Contracting	March 1994 and ongoing



## PART IV: DEFINITIONS

### 2-IV.A. DEFINITIONS [24 CFR 984.103]

The terms *1937 Act*, *fair market rent*, *HUD*, *low-income family*, *public housing*, *public housing agency (PHA)*, *secretary*, and *Section 8*, as used in this document are defined in the 24 CFR Part 5.

The term *very low-income family* is defined in 24 CFR 813.102 and 24 CFR 913.102.

The terms used in this document have the following definitions as defined by 24 CFR 984.103 and this family self-sufficiency action plan.

*Baseline annual earned income* means the FSS family's total annual earned income from wages and business income (if any) as of the effective date of the FSS contract. When calculating baseline annual earned income, all applicable exclusions of income must be applied, *except for* any disregarded earned income or other adjustments associated with self-sufficiency incentives that may apply to the determination of annual income.

*Baseline monthly rent* means 1) the FSS family's total tenant payment (TTP), as of the effective date of the FSS contract, for families paying an income-based rent as of the effective date of the FSS contract; or 2) the amount of the flat or ceiling rent (which includes the applicable utility allowance), and including any hardship discounts, as of the effective date of the FSS contract. For families paying a flat or ceiling rent this is as of the effective date of the FSS contract.

#### PCHA Policy

*Benefits* means a government benefit of money or monetary value given to an individual by a federal, state, or local government agency for purposes of financial assistance, including but not limited to, Medicaid, supplemental nutritional assistance program benefits and Social Security, Temporary Assistance for Needy Families, and unemployment compensation benefits.

#### PCHA Policy

*Benefits cliff* means the sudden and often unexpected decrease in public benefits that can occur with a small increase in earnings. When income increases, families sometimes lose some or all economic supports.

#### PCHA Policy

*Certain interim goals* means the family has met all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date.

*Certification* means a written assertion based on supporting evidence, provided by the FSS family or the PHA or owner, which must be maintained by the PHA or owner in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification. These must be made available for inspection by HUD, the PHA or owner, and the public, when appropriate. In addition, these will be considered accurate unless the Secretary or the PHA or owner, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

*Chief executive officer (CEO)* means the CEO of a unit of general local government who is the elected official or the legally designated official having primary responsibility for the conduct of that entity's governmental affairs.

*Contract of participation (CoP)* means a contract in a form approved by HUD, entered into between a participating FSS family and a PHA operating an FSS program that sets forth the terms and conditions governing participation in the FSS program. The contract of participation includes all individual training and services plans entered in between the PHA and all members of the family who will participate in the FSS program, and which plans are attached to the contract of participation as exhibits. For additional detail, see 24 CFR 984.303.

*Current annual earned income* means the FSS family's total annual earned income from wages and business income (if any) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract. When calculating current annual earned income, all applicable exclusions of income will apply, including any disregarded earned income and other adjustments associated with self-sufficiency incentives or other alternative rent structures that may be applicable to the determination of annual income.

*Current monthly rent* means either the FSS family's TTP as of the most recent reexamination of income, which occurs after the effective date of the FSS contract, for families paying an income-based rent as of the most recent reexamination of income; or the amount of the flat rent, including applicable utility allowance or ceiling rent. This amount must include any hardship discounts, as of the most recent reexamination of income, which occurs after the effective date of the FSS contract, for families paying a flat rent or ceiling rent as of the most recent reexamination of income.

*Earned income* means income or earnings included in annual income from wages, tips, salaries, other employee compensation, and self-employment. Earned income does not include any pension or annuity, transfer payments, any cash or in-kind benefits, or funds deposited in or accrued interest on the FSS escrow account established by a PHA on behalf of a participating family.

*Effective date of contract of participation* means the first day of the month following the month in which the FSS family and the PHA entered into the contract of participation.

*Eligible families* for the FSS program means current participants in Section 8, residents of public housing, or residents in multifamily-assisted housing if a Cooperative Agreement exists.

### **PCHA Policy**

***Enhance the effectiveness of the FSS program* means a demonstrable improvement in the quality of an FSS program in which the enrollment ratio, escrow balance average, and graduation rate is at or above the national average as measured in HUD's Composite Scores in FR Notice 11/15/18.**

*Enrollment* means the date that the FSS family entered the contract of participation with the PHA.

*Family self-sufficiency program or FSS program* means the program established by a PHA within its jurisdiction to promote self-sufficiency among participating families, including the provision of supportive services to these families, as authorized by section 23 of the 1937 Act.

*FSS escrow account* means the FSS escrow account authorized by section 23 of the 1937 Act.

*FSS escrow credit* means the amount credited by the PHA to the participating family's FSS account.

*FSS family* means a family that receives Section 8 assistance or resides in public housing (section 9), that elects to participate in the FSS program, and whose designated adult member (head of FSS family) has signed the CoP.

*FSS family in good standing* means an FSS family that is in compliance with their FSS CoP, has either satisfied or are current on any debts owed the PHA or owner, and is in compliance with the regulations in 24 CFR Part 5 regarding participation in the relevant rental assistance program.

*FSS-related service program* means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of *supportive services*.

*FSS slots* refer to the total number of public housing units or the total number of rental vouchers that comprise the minimum size of a PHA's respective Section 8 and public housing FSS program.

*FSS Program Coordinator* means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS participants; goal setting and case management/coaching of FSS participants; collaborating with the community and service partners; and tracking program performance.

*FY* means federal fiscal year (starting with October 1, and ending September 30, and designated by the calendar year in which it ends).

*Head of FSS family* means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent.

*Individual Training and Services Plan (ITSP)* means a written plan that is prepared by the PHA or owner in consultation with a participating FSS family member (the person with for and whom the ITSP is being developed), and which describes the final and interim goals for the participating FSS family member, the supportive services to be provided to the participating FSS family member, the activities to be completed by that family member, and the agreed upon completion dates for the goals, and activities. Each ITSP must be signed by the PHA or owner and the participating FSS family member and is attached to and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS program, including the head of FSS family who has signed the CoP.

Knowledgeable professional

PCHA Policy

*Knowledgeable professional* means a person who is knowledgeable about the situation, has training, education, certification, or licensure provided by recognized professional associations and institutions that legitimizes their professional opinion, is competent to render a professional opinion, and is not able to gain, monetarily or otherwise, from PCHA FSS program decision in the area to which they are certifying.

*Multifamily-assisted housing, also known as project-based rental assistance (PBRA)*, means rental housing assisted by a Section 8 Housing Payments Program, pursuant to 24 CFR Parts 880, 881, 883, 884, and 886.

PHA Policy

*Other costs related to achieving obligations in the contract of participation* means any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP.

*Owner* means the owner of multifamily-assisted housing.

*Participating family* is defined as *FSS family* in this section.

*Program coordinating committee (PCC)* means the committee described in 24 CFR 984.202.

*Public housing* means housing assisted under the 1937 Act, excluding housing assisted under Section 8 of the 1937 Act.

*Section 8* means assistance provided under Section 8 of the 1937 Act (42 U.S.C. 1437f). Specifically, multifamily-assisted housing, as defined in this section; tenant-based and project-based rental assistance under section 8(o) of the 1937 Act; the HCV homeownership option under section 8(y) of the 1937 Act; Family Unification Program (FUP) assistance under section 8(x) of the 1937 Act; and the Section 8 Moderate Rehabilitation (Mod Rehab) for low-income families and Moderate Rehabilitation Single Room Occupancy (Mod Rehab SRO) for homeless individuals under 24 CFR part 882.

*Self-sufficiency* means that an FSS family is no longer receiving Section 8, public housing assistance, or any federal, state, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS account funds.

PCHA Policy

*Supports* means, but is not limited to, transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator.

*Supportive services* mean those appropriate services that a PHA will coordinate on behalf of an FSS family under a CoP. These may include child care of a type that provides sufficient hours of operation and serves an appropriate range of ages; transportation necessary to enable a participating family to receive available services or to commute to their places of employment; remedial education; education for completion of secondary or post-secondary schooling; job training, preparation, and counseling; job development and placement; follow-up assistance after job placement and completion of the contract of participation; substance/alcohol abuse treatment and counseling; training in homemaking and parenting skills; and personal welfare services that include substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services; household management; money management; counseling regarding homeownership or opportunities available for affordable rental and homeownership in the private housing market (including information on an individual's rights under the Fair Housing Act) and financial empowerment that may include financial literacy, coaching, asset building, money management; and any other services and resources, including case management and reasonable accommodations for individuals with disabilities, that the PHA may determine to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency.

*Unit size or size of unit* refers to the number of bedrooms in a dwelling unit.

*Very low-income family* is defined as set out in 24 CFR 813.102

*Welfare assistance* means (for purposes of the FSS program only) income assistance from federal or state welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs. Welfare assistance does not include nonrecurrent, short-term benefits that are designed to deal with a specific crisis situation or episode of need, or are not intended to meet recurrent or ongoing needs and will not extend beyond four months; work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training); supportive services such as child care and transportation provided to families who are employed; refundable earned income tax credits; contributions to, and distributions from, individual development accounts under TANF; services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement and other employment-related services that do not provide basic income support; transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of the Social Security Act, to an individual who is not otherwise receiving assistance; amounts solely directed to meeting housing expenses; amounts for health care; food stamps and emergency rental and utilities assistance; and SSI, SSDI, or social security.

## Chapter 3

### PROGRAM ADMINISTRATION

#### INTRODUCTION

This chapter discusses administrative policies and practices as they are relevant to the activities covered in this plan. The policies and practices are discussed in two parts:

Part I: Staffing, Fees and Costs, and On-Site Facilities: This part describes identifying appropriate staff and contractors to operate the FSS program and provide the necessary direct services to FSS families. In addition, it describes how administrative fees, costs, and supportive services will be funded, and defines the use of on-site facilities.

Part II: The Program Coordinating Committee: This part covers the establishment of a program coordinating committee (PCC), which is a regulatory requirement in all FSS programs other than multifamily housing assistance. It describes required and recommended PCC membership, in addition to the option for an alternative committee.

#### PART I: STAFFING, FEES AND COSTS, AND ON-SITE FACILITIES

##### 3-I.A. OVERVIEW

Several functions of program administration are crucial to running an FSS program. A PHA may need to employ a program coordinator or decide to contract with another organization to administer the program. In addition to staffing issues, PHAs should understand how program funding and expenses work to keep the program running smoothly. Finally, PHAs need to sort out whether and how to make common areas or unoccupied units available to provide supportive services.

##### 3-I.B. PROGRAM ADMINISTRATION STAFF AND CONTRACTORS

[24 CFR 984.301(b)]

PHAs have the choice between hiring their own staff and contracting with an outside organization to administer their FSS program. If the PHA should choose to employ its own staff, the staffing levels should be appropriate, and may include one or more FSS coordinators. If the PHA chooses to contract with an outside organization, the organization's staffing levels must likewise be appropriate to establish and administer the FSS program, and whether the organization's responsibilities would include managing the FSS account in accordance with federal regulations.

##### PHA Policy

The PHA will employ appropriate staff, including one or more FSS coordinators or program coordinators to administer its FSS program.

### **3-I.C. FSS PROGRAM COORDINATOR RESPONSIBILITIES**

#### **Primary Role of the FSS Program Coordinator**

The FSS Program Coordinator is responsible for building partnerships with service providers in the community, working with the Program Coordinating Committee (PCC) and local service providers to ensure that FSS program participants are linked to the supportive services they need to achieve self-sufficiency, preparing an Individual Training and Services Plan (ITSP) for the head of the FSS family and each adult member of the FSS family who elects to participate in the FSS program, making certain that the services included in the participants' CoP are provided on a regular, ongoing, and satisfactory basis, ensuring FSS participants are fulfilling their responsibilities under the CoPs, monitoring progress of participants, and establishing and properly maintaining FSS escrow accounts for eligible families. FSS coordinators may also provide outreach, recruitment, goal setting, case management and coaching for FSS participants, and tracking of FSS program performance.

FSS Program Coordinators funded under the FSS Coordinator Notice of Funding Opportunity (NOFO) may not perform the routine public housing or Section 8 program functions of housing eligibility, leasing, rent calculation, and portability that are funded through Section 8 administrative fees or public housing operating funds unless doing so would enhance the effectiveness of the program. If conducting these functions would enhance the effectiveness of the FSS program, the PHA must seek prior approval from HUD of those enhancements to the FSS program and certify that doing so will neither interfere with the FSS Coordinator's ability to fulfill their primary role nor be used to balance or fill in for gaps in traditional staffing.

Performance of routine Section 8 or public housing functions for non-FSS families does not enhance the effectiveness of the FSS program and is therefore an ineligible use of FSS funds [2021 FSS NOFO, p. 36].

#### **PCHA Policy**

**The PHA will not require the FSS Program Coordinator to perform the routine Section 8 or public housing program functions of housing eligibility, leasing, rent calculation, and portability that are funded through Section 8 administrative fees or public housing operating funds.**

### **3-I.D. ADMINISTRATIVE FEES AND COSTS**

The Consolidated Appropriations Act of 2014 combined funding streams for the Section 8 and public housing FSS programs. FSS funding is now awarded through one NOFO. Use of this funding is no longer restricted to the applicable program and funding now may be used to serve both Section 8 and public housing FSS participants. Funding for FSS Coordinators salary, benefits, and training as well as limited administrative costs is awarded through a Grant Agreement and disbursed through HUD's Line of Credit Control System (LOCCS), rather than as an amendment to the PHA's Annual Contributions Contract (ACC). These funds are separate from other available funds that may be used.

#### **Section 8 FSS Program**

In the Section 8 programs, administrative fees are paid to PHAs for HUD-approved costs associated with the operation of an FSS program. These administrative fees are established by Congress and subject to appropriations [24 CFR 984.302(b)].

In addition, administrative fees for HUD-approved costs not specifically related to the operation of the FSS program may be used to cover these costs associated with the administration of FSS [see Notice PIH 93-24 E-7 and E-8].

See 24 CFR 982.152 and PIH 2022-18 for details on the eligible use of administrative fees.

#### **Public Housing FSS Program**

For public housing FSS programs, the performance funding system (PFS), provided under section 9(a) of the 1937 Act, provides for the reasonable and eligible administrative costs that the PHA incurs in carrying out the program only when funds have been appropriated. However, a PHA may use other resources for this purpose [24 CFR 984.302(a)].

In other words, the PHA may fund reasonable and eligible administrative costs in the FSS program from the Operating Fund. However, these expenses will only be reimbursed in the operating subsidy when a current appropriations act allows it. In addition, the PHA may fund reasonable and eligible administrative costs from the Capital Fund. Administrative staffing costs may also be funded through HUD or other grant or foundation sources. This includes FSS Coordinator grants when available.



### **3-I.E. SUPPORTIVE SERVICES FEES AND COSTS**

#### **Section 8 FSS Supportive Services**

In the Section 8 program, the PHA may fund reasonable and eligible FSS supportive service costs in the FSS program from unrestricted net position [see Notice PIH 93-24, E-3].

The PHA may seek additional funds from HUD through submitting grant applications or seek grants from other sources when available.

In addition to unrestricted net position and other grant sources, the FSS forfeited escrow account can fund FSS supportive services. See Section 6-I.E. for eligible supportive services costs.

#### **Public Housing FSS Supportive Services**

In public housing, the PHA may fund reasonable and eligible FSS supportive service costs in the FSS program from the Operating Fund. However, the costs of FSS supportive services are only reimbursed through the operating subsidy when appropriations allow it.

FSS public housing supportive services can also be funded through other HUD grants or related government and foundation grants, when available.

### **3-I.F. USE OF FORFEITED ESCROW ACCOUNTS FUNDS**

**In addition to Section 8 unrestricted net assets, public housing operating funds, and other grant sources, the FSS forfeited escrow account funds must be used for the benefit of FSS participants, which includes supports and other costs for FSS participants in good standing. HUD does not provide an exhaustive list of these supports. However, the supports include, but are not limited to, transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the contract of participation as well as training for FSS Program Coordinators.**

#### **PCHA Policy**

**PCHA will use forfeited escrow accounts for support and other costs for FSS participants in good standing when funds requested are needed to complete an interim goal or task in the ITSP and are not ongoing expenses or if the family can demonstrate that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals in the ITSP.**

**PCHA will use forfeited escrow accounts for training provided to FSS Coordinators.**

**PCHA will define *supports* as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s)**

PCHA will define *other costs related to achieving obligations in the CoP* as any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s).

PCHA will define *necessary to complete* as meaning that no other resources are available in the community either because such a resource is non-existent or that resources are utilized above capacity and agencies cannot, for an indetermined period, provide such a resource.

PCHA will provide funds from the forfeited escrow account to FSS participants in good standing before requiring the participant to use an “interim” disbursement from their current escrow account so long as:

The funds requested are needed to complete an interim goal or task within the CoP and are not ongoing expenses; or

If the family has demonstrated that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.

PCHA will prioritize requests for funds from forfeited escrow accounts initially on a first come first served basis based on the date and time of the request. After that order is established, while still preserving the first come first served basis, the PHA will apply the following priorities:

**Priority 1:** Funds to meet a goal in the ITSP that is necessary to ensure the safety and well-being of victims of domestic violence, dating violence, sexual assault, and stalking as defined in the PHA’s Section 8 Administrative Plan and public housing Admissions and Continued Occupancy Policy regarding VAWA.

**Priority 2:** Funds to meet a goal in the ITSP that is necessary to stabilize health, safety, and welfare of the FSS participant or family that if left unattended would jeopardize education, training, or employment.

**Priority 3:** Funds to meet a goal in the ITSP that is necessary to further education, training, and employment goals in the ITSP including childcare, transportation, and medical costs if the lack of any of these prevents completion of the education, training, and employment.

**Priority 4:** Funds to meet a goal in the ITSP that is necessary to further any other goal or tasks.

### **3-I.G. ON-SITE FACILITIES**

Each PHA may, subject to the approval of HUD, make available and utilize common areas or unoccupied dwelling units in public housing projects to provide supportive services under an FSS program. This includes using such areas for participants in a Section 8 FSS program.

#### **PCHA Policy**

PCHA will not make provide supportive services under the public housing or housing choice voucher FSS program in public housing projects due to the fact that PCHA's public housing is comprised of scattered site single family homes.

## PART II: PROGRAM COORDINATING COMMITTEE

### 3-II.A. OVERVIEW

As another integral part of FSS program administration, each participating PHA must establish a program coordinating committee (PCC) whose functions will be to assist the PHA in securing commitments of public and private resources for the operation of the FSS program within the PHA's jurisdiction, including assistance in developing the action plan and in implementing the program [24 CFR 984.202(a)].

The PCC must consist of specific members, which are dependent upon whether the PHA is operating Section 8, public housing, or multifamily assisted housing FSS programs. In addition to these required members, the PCC may also include additional members recommended by regulation.

### 3-II.B. PROGRAM COORDINATING COMMITTEE MEMBERSHIP

#### **Required PCC Membership [24 CFR 984.202(b)(1)]**

The PCC required members consist of representatives of the PHA, including at least one FSS Program Coordinator, and one or more participants from each HUD rental assistance program (Section 8, public housing, or multifamily assisted housing) served by the PHA's FSS program.

#### **PCHA Policy**

**The PHA's representatives to the program coordinating committee will be *Tamara Meade, Director of Supported Housing Programs* and at least one FSS Program Coordinator and one or more participants from each of the housing programs in which there is an FSS program: Section 8, public housing, and multifamily assisted housing, as applicable.**

#### **Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)]**

The PHA may seek assistance from area-wide, city-wide, or development-based resident councils, the resident management corporation, or the Resident Advisory Board, in identifying potential PCC members.

#### **PHA Policy**

The PHA will seek assistance in identifying potential members of the PCC from area-wide, city-wide, and development-based resident councils, the resident management corporation, or the Resident Advisory Board.

## **Recommended PCC Membership [24 CFR 984.202(b)(2)]**

Membership on the PCC also may include representatives of the unit of general local government served by the PHA, local agencies (if any) responsible for carrying out employment training programs or programs funded under the Workforce Innovation and Investment Act, and other organizations, such as other state, local, or tribal welfare and employment agencies, public and private education or training institutions, child care providers, nonprofit service providers, private business, and any other public and private service providers with resources to assist the FSS program.

### **PHA Policy**

The PHA's FSS program coordinating committee membership will include leadership from the following organizations:

***United Way of Pierce County***

***Sound Outreach***

***Habitat for Humanity***

***Tacoma Goodwill***

***Crescent Realty, Inc***

***Veterans United Home Loans***

***WorkSource WA***

***Tacoma Community College***

***Pierce County Library***

***Clover Park Technical College***

***Bates Technical College***

***Pierce County Human Services***

***Northwest Furniture Bank***

***Port of Tacoma Jobs***

***South Puget Sound Intertribal Planning Agency***

***Tacoma Urban League***

***City of Tacoma***

***State Farm Insurance***

***James Hardie Building Products***

***Department of Health and Social Services***

***Harborstone Credit Union***

### **3-II.C. ALTERNATIVE PCC COMMITTEE [24 CFR 984.202(c)]**

It is also possible for the PHA, in consultation with the chief executive officer of the unit of general local government served by the PHA, to use an existing entity as the PCC, if the membership of the existing entity consists or will consist of the individuals required by regulation (See section 3-II.B. above).

#### **PCHA Policy**

PCHA will not utilize an existing entity as its program coordinating committee.

### EXHIBIT 3-1: CHART FOR DETERMINING PCC MEMBERSHIP

- **THIS IS NOT REQUIRED TO BE SUBMITTED AS PART OF THE PLAN TO HUD BUT WE HAVE PARTNERS WE CAN LIST HERE AND I THINK A GREAT IDEA, SO WILL WORK IN FILLING IN THE TBD'S**

Organization or Service Type	Organization Name	PCC Member Title	PCC Member Name
Housing	PCHA Housing Counseling Agencies Continuum of Care Emergency Shelters Transitional Housing	Director of Supported Housing	<b>Tamara Meade</b>
GED and Educational Training	Community College Adult Education Workforce Investment Center	Dean of Instruction Chair, Welfare to Work Program Counselor Head of Displaced Homemaker Program Director	TBD
High School	Public High School Charter High School	Chair, Vocational Education Principal	TBD
Post-Secondary Schools	College University	Chancellor's Office or Delegate	<b>TBD</b>
Job Training	Community College Adult Education Workforce Innovation and Opportunity Board and Centers TANF SSI/PASS Program	Dean of Instruction Chair, Welfare to Work Program Counselor Head of Displaced Homemaker Program Director	<b>TBD</b>
Job Search, Placement, Retention	Community College Adult Education Workforce Investment Center TANF	Dean of Instruction Chair, Welfare to Work Program Counselor Head of Displaced Homemaker Program Director	TBD

<b>Organization or Service Type</b>	<b>Organization Name</b>	<b>PCC Member Title</b>	<b>PCC Member Name</b>
Transportation	Office of Public Transportation Dial-a-Ride	Director	TBD
Health Care	Community Clinic Hospital Public Health Office Veteran's Administration	Director	TBD
Alcohol and Drug Prevention	Clinic Hospital Narcotics Anonymous Alcoholics Anonymous Drug and Alcohol Rehab Centers	Director	TBD
Mentoring	Score RSVP	Director	TBD
Homeownership	PHA First-Time Homebuyers Habitat for Humanity	Director	TBD
Individual Development Accounts	PHA TANF Banks Lending Institutions	Director	TBD
Child Care	Child Care Resource Center TANF	Director	TBD
City, State, or County Government	Mayor's Office Governor's Office Board of Supervisors	Mayor or Mayor's Chief Aide Governor or Chief Aide Chairperson or Chief Aide	TBD
Community-Based Organizations	Urban League Neighborhood House Union of Pan Asian Communities		TBD



<b>Organization or Service Type</b>	<b>Organization Name</b>	<b>PCC Member Title</b>	<b>PCC Member Name</b>
Social Service Funding and Coordination Organizations	United Way	Director, Information Referral Services Director, Volunteer Services	TBD
Information and Referral Services	Infoline Senior I and R	Director	TBD
Crisis Services	Crisis Team Senior Crisis Team Poison Center Domestic Violence Shelter	Director	TBD
Child/Adult Protective Services	Senior Services Adult Services In-home Support Services Adult Abuse Hotline Child Abuse Hotline Foster Care Adoption Services	Director	TBD
Vocational Rehabilitation	State Department of Rehabilitation Regional Centers		TBD
Employment Development	Employment Development Department Unemployment Workforce Investment Act Disability Insurance		TBD
Parks and Recreation	Community Centers Recreation Centers		TBD

<b>Organization or Service Type</b>	<b>Organization Name</b>	<b>PCC Member Title</b>	<b>PCC Member Name</b>
Religious Organizations	Catholic Community Services Episcopal Community Services Jewish Family Services Islamic Circle of North America St. Vincent de Paul		TBD
Financial Institutions	Banks Credit Unions Mortgage Lenders		TBD
Legal Services	American Civil Liberties Union Legal Aid	Director	TBD
Debt Resolution Services	Consumer Credit Counselors	Director	TBD

## **Chapter 4**

### **SELECTING AND SERVING FSS FAMILIES**

#### **INTRODUCTION**

FSS regulations require that the PHA include in its action plan a statement indicating how it will select families for participation in the FSS program. This includes outreach, waiting list management, and other selection procedures. When followed, the PHA's selection procedures ensure that families will be selected without regard to race, color, religion, sex, handicap, familial status, or national origin.

Once selected for participation in the FSS program, families are to be provided various activities and supportive services so that they may obtain the education, employment, business, and social skills necessary to achieve self-sufficiency. A description of such activities and supportive services is also a requirement of the FSS action plan.

This chapter contains three parts:

Part I: Incentives, Outreach, and Assurance of Noninterference: This part describes the incentives the PHA will offer and the outreach efforts the PHA will use to encourage participation and recruit eligible families for the FSS program and contains the required assurance of noninterference with the rights of nonparticipating families.

Part II: Family Selection: This part covers whether the PHA will use preferences for family selection and which preferences the PHA will employ if they choose to do so. In addition, this part describes the selection factors the PHA will use in screening families for participation in the FSS program.

Part III: Activities and Support Services: This part lists the activities and supportive services to be provided to families through both public and private resources, describes the method the PHA will use to identify family support needs, and covers the required certification of coordination.

## **PART I: INCENTIVES, OUTREACH, AND ASSURANCE OF NONINTERFERENCE**

### **4-I.A. OVERVIEW**

The FSS program offers incentives such as the FSS escrow account, case management, coaching, and other supportive services that not only encourage participation, but also help families achieve self-sufficiency. In addition to encouraging program participation through such incentives, PHAs also conduct outreach to recruit FSS participants from among eligible families. As part of this process, families need to know that their choice as to whether to participate in the FSS program will not affect their admission to the Section 8 or public housing programs, nor will it affect their right to occupancy. This part describes the PHA's policies regarding these issues, all of which are required aspects of the FSS action plan.

#### 4-I.B. INCENTIVES FOR PARTICIPATION [24 984.201(d)(5)]

By regulation, the FSS action plan must include a PHA's incentives plan—a description of the incentives that the PHA intends to offer eligible families to encourage their participation in the FSS program. The incentives plan provides for the establishment of the FSS escrow account and any other incentives designed by the PHA.

##### PCHA Policy

PCHA will offer the following services, as needed to complete obligations in the contract, to its FSS participants as incentives to participate in FSS.

Incentive	Provided By	Description
FSS escrow account	PCHA	Escrow calculation based on baseline income and increases derived through employment
Case management/Coaching	PCHA FSS Coordinators	One on one case management to address family needs and barriers
Information on and referrals to services	PCHA FSS Coordinators	Direct referrals to PCC member organizations and other community partners for education, employment, childcare, benefits, and other resources
Educational workshops	PCHA FSS Coordinators	Required classes include budgeting, credit repair, preparation for homeownership. Additional workshop, driven by participant interest and need, include predatory lending, barriers to employment, resume development, Interviewing, navigating the benefits cliff, career exploration, workplace culture.
Financial coaching	PCHA FSS Coordinators	One on one financial coaching combined with classroom instruction covers topics such as budgeting, credit repair, savings, retirement planning, income generation, and preparation for homeownership.
Employment coaching	PCHA FSS Coordinators	One on one coaching in preparation, search, retention and growth.

Access to refinancing for lower interest rates on automobiles	PCHA FSS/Harborstone Credit Union	Clients engaged financial coaching through FSS are eligible for referral to Harborstone Credit Union for lower interest rate reductions.
Access to lower interest rates auto loans	PCHA FSS/Harborstone Credit Union	Clients engaged financial coaching through FSS are eligible for referral to Harborstone Credit Union for lower interest rate auto loans
Pacific Institute training	PCHA	Self-actualization program targeted to helping participants achieve successes by changing their expectations for themselves and their future.
Priority in homeownership programs	PCHA FSS Coordinators	Potential homeowners attend mandatory sessions in budgeting, income, credit repair/building, working with lenders and realtors, and down payment assistance.

#### **4-I.C. OUTREACH EFFORTS [24 CFR 984.201(d)(6)(i)(ii)]**

In addition to offering incentives for FSS participation, PHAs also conduct outreach to recruit more FSS participants from eligible families. The FSS action plan must include a description of these efforts to recruit FSS participants, including notification and outreach, the actions the PHA will take to assure that both minority and nonminority groups are informed about the FSS program, and how the PHA will make this information known.

##### **PHA Policy**

The PHA will notify eligible families about the FSS program using the following outreach locations, activities, methods, and languages, where appropriate. These points of contact and methods have been selected to ensure that both minority and nonminority groups are informed about the FSS program.

<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
Briefings/Orientations	PCHA Staff Specialists/FSS Coordinators	Flyer Presentation Application	English/Spanish/Russian
Interims/Recertifications	PCHA Staff Specialist	Flyer Posters Website	English/Spanish/Russian
Transfers/Portability	PCHA Staff Specialist	Flyer Applications Presentation	English/Spanish/Russian
Lobby	PCHA Staff Receptionist	Flyer Posters Application	English/Spanish/Russian
Waiting Room	PCHA Staff	Flyer	English/Spanish/Russian
Mailings	FSS Coordinators, PCHA HCV/PH staff	Flyer Program Description, Application	English/Spanish/Russian
PHA Website Social Media	PHA Staff	Program description, Application	English/Spanish/Russian

#### **4-I.D. ASSURANCE OF NONINTERFERENCE WITH THE RIGHTS OF NONPARTICIPATING FAMILIES [24 CFR 984.201(d)(10)]**

A family's housing assistance or admission into assisted housing should never depend on whether they choose to participate in the FSS program, and PHAs need to make this known as part of the recruitment process. For this reason, the PHA's action plan must include an assurance that a family's decision to not participate in the FSS program will not affect the family's admission to the Section 8 or public housing programs, nor will it affect the family's right to occupancy in accordance with the lease.

##### **PHA Policy**

Participation in the FSS program is strictly voluntary. Section 8 participants and public housing residents will be notified in all literature and media presentations related to the FSS program that should they decide not to participate in the FSS program, it will not affect their Section 8 or public housing. This material will also specify that the family will retain the right to occupancy according to their lease and family obligations contract.



## **PART II: FAMILY SELECTION**

### **4-II.A. OVERVIEW**

The FSS action plan is required to contain a statement indicating the procedures for selecting families for FSS program participation, including a description of how the PHA will do so without regard to race, color, religion, sex (including actual or perceived gender identity), familial status, or national origin. This part describes these procedures, considering whether the PHA will use preferences for family selection and which preferences the PHA will employ if they choose to do so, in addition to defining the factors the PHA will use in screening families for program participation.

### **4-II.B. FSS SELECTION PREFERENCES**

As part of the process for selecting families for participation in the FSS program, the PHA may choose whether to employ the use of preferences. If the PHA so chooses, it has the option of giving a selection preference for up to 50 percent of its FSS program slots to eligible families who have one or more family members currently enrolled in an FSS-related service program or who are on the waiting list for such a program. Such a preference may be further limited to participants in and applicants for one or more specific eligible FSS-related service programs.

Should the PHA choose to adopt such a preference, it would need to include the following information in its action plan:

- The percentage of FSS slots, not to exceed 50 percent of the total number of FSS slots for each of its FSS programs, for which it will give a selection preference
- The FSS related service programs to which it will give a selection preference to the programs' participants and applicants
- The method of outreach to and selection of families with one or more members participating in the identified programs [24 CFR 984.203(a)]

A PHA may wish to adopt additional selection preferences as well [Notice PIH 93-24].

#### PCHA Policy

PCHA will not adopt the use of preferences when selecting families for participation in the FSS program.

The PHA may use either of the following to select among applicants on the FSS waiting list with the same preference status [24 CFR 984.203(b)]:

- Date and time of application to the FSS program; or
- A drawing or other random choice technique.

#### PCHA Policy

PCHA will use the date the family expressed an interest in participating in the FSS program to fill the FSS slots.

### **4-II.C. SELECTION FACTORS**

Many factors contribute to whether a PHA may choose to select a family for participation in the FSS program. These selection factors can help the PHA screen families for admission, and ultimately contribute to the PHA's decision to either allow or deny a family's admission into the FSS program.

#### **Motivation Selection Factors [24 CFR 984.203(d)(1)]**

A PHA may screen families for interest and motivation to participate in the FSS program provided that the factors utilized by the PHA are those which solely measure the family's interest and motivation to participate in the FSS program. For this reason, PHAs must only apply motivational screening factors that are permissible under the regulations.

#### ***Permissible Motivation Selection Factors***

Permitted motivational factors include requiring attendance at FSS orientation sessions or pre-selection interviews or assigning certain tasks indicating the family's willingness to undertake the obligations that may be imposed by the FSS contract of participation. However, any tasks assigned should be readily accomplishable by the family based on the family members' educational level, abilities, or disabilities, if any. Reasonable accommodations must be made for individuals whose disability (mobility, manual, sensory, speech impairments, mental, or developmental disabilities) creates a barrier to accomplishing the tasks [24 CFR 984.203(d)(2)].

#### PCHA Policy

PCHA will screen families for interest and motivation to participate in the FSS program by assigning a meeting or workshop which is the same type of meeting or workshop for each family. PCHA will only use the fact that the family attended as a screening factor, even if tasks or exercises are not completed in the meeting. In addition, if the family needs either childcare or transportation to be able to attend, or requests an accommodation for a disability, PCHA will either refer the family to available services or exempt the family from this screening factor.

### ***Prohibited Motivation Selection Factors***

Prohibited motivational screening factors include the family's educational level, educational or standardized motivational test results, previous job history or job performance, credit rating, marital status, number of children, or other factors, such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or nonminority groups [24 CFR 984.203(d)(3)].

### **Other Selection Factors**

In addition to motivational screening, the PHA may also wish to screen families for the following additional factors.

#### ***PHA Debt Selection Factor***

The PHA may deny FSS participation to a family if the family owes the PHA, or another PHA, money in connection with Section 8 or public housing assistance [Notice PIH 93-24, B-18].

##### PCHA Policy

PCHA will deny FSS participation to a family if the family owes the PCHA, or another PHA, money in connection with Section 8 or public housing assistance. Families that owe money to a PHA who have entered into a repayment agreement and are current on that repayment agreement will not be denied FSS participation.

#### ***Unavailable Support Services Selection Factor***

If the PHA determines, after consulting with the family, that a missing service is essential to the family's needs, the PHA may skip that family (and other similar families) and offer the FSS slot to the next family for which there are available services [Notice PIH 93-24, B-8].

##### PCHA Policy

In the event that a missing service is key to the family's needs and PCHA is unable to facilitate provisions of the needed services, PCHA may skip the family and off the FSS slot to the next available family.

#### ***Previous Participation Selection Factor***

A PHA may refuse to select a family for participation in the FSS program a second time if that family previously participated unsuccessfully (i.e., the family participated, did not meet its FSS obligations, and was terminated from the FSS program) [Notice PIH 93-24, B-14].

##### PCHA Policy

PCHA will not refuse to select a family for participation in the FSS program a second time if that family previously participated and did not complete.

#### **4-II.D. SELECTION OF HEAD OF HOUSEHOLD**

**Each eligible family that is selected to participate in an FSS program must enter a contract of participation with the PHA. There will be no more than one contract at any time for each family. There may be an ITSP for as many members of the family who wish to participate. The contract shall be signed by a representative of the PHA and the head of FSS family, as designated by the family. This head of FSS family does not have to be the same as the official head of household for rental assistance purposes [24 CFR 984.303(a)].**

##### **PCHA Policy**

**PCHA will meet with the family and detail the obligations, rights, and privileges that pertain to the FSS head of household and require each adult family member to certify their agreement as to their designated head of the FSS family. These certifications will be a permanent part of the FSS family's record and will be updated with each change of head of household.**

## **PART III: ACTIVITIES AND SUPPORT SERVICES**

### **4-III.A. OVERVIEW**

Once families are admitted to the FSS program, the PHA becomes responsible for making sure these families are adequately served. The purpose of the family self-sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of Section 8 and public housing assistance programs with public and private resources, to enable families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency. As such, upon selection, families are matched with the appropriate activities and supportive services so that they may obtain the education, employment, and business and social skills necessary to achieve self-sufficiency. This is a vital element of the FSS program. The PHA must make a good faith effort to replace the obtained services from another agency.

### **4-III.B. METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS**

**[24 CFR 984.201(d)(8)]**

Before a PHA can determine the services and activities it will provide to FSS families, it must identify the services and activities appropriate to each family. The action plan must contain a description of how the program will identify the needs of FSS families and deliver the services and activities according to these needs.

#### PCHA Policy

Supportive services needs will be identified by completion of an informal needs assessment with the FSS coordinator or case manager before completion of the initial individual training and services plan and signing of the contract of participation. After enrollment in PCHA's FSS program, a formal needs assessment, including vocational assessment and counseling, educational assessment and counseling, and employment planning, is conducted by the following partners on the PCC as needed

Adult basic education

Community college

Employment services/WorkSource

DSHS/TANF

These results are used to modify the ITSP, in mutual agreement with the family.

**4-III.C. FSS ACTIVITIES AND SUPPORT SERVICES DESCRIPTION**  
**[24 CFR 984.201(d)(7)]**

As part of the required contents of the action plan, PHAs must both describe the activities and supportive services to be provided by public and private resources to FSS families and identify the public and private resources that are expected to provide the supportive services.

Of course, this task assumes that the PHA has first identified the needed activities and supportive services.

PCHA Policy

PCHA's FSS program, through its partners on the program coordinating committee, will provide the following activities and support services to FSS families:

<b>Support Service General</b>	<b>Support Service Specific</b>	<b>Source/Partner</b>
<b>Assessment</b>	Vocational Assessment Educational Assessment Vocational Planning Educational Planning Disability Assessment Disability Vocational Assessment/Planning Disability Educational Assessment/Planning Drug/Alcohol Assessment Drug/Alcohol Planning	Adult Basic Education Career Center Community College Community Based Organizations Career Center Community College Vocational Rehabilitation Health Department Career Center Community-based Organizations
<b>Education</b>	High School English as a Second Language GED Post-secondary College	High School Adult Basic Education Community College University
<b>Training</b>	Skills Training Emerging Technologies Training Biomedical Training On-the-Job Training Functional Context Training	Adult Basic Education Community College University Community-based Organizations Workforce Innovation/American Job Centers

<b>Support Service General</b>	<b>Support Service Specific</b>	<b>Source/Partner</b>
<b>Job Search Assistance</b>	Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement	Adult Basic Education Community College University Community-based Organizations Workforce Innovation/American Job Centers
<b>Transportation</b>	Bus Train/Trolley	Pierce Transit Sound Transit
<b>Health Care</b>	Alcohol and Drug Prevention Alcohol and Drug Treatment	HMO Health Department Community Clinic Hospitals
<b>Child Care</b>	Infant Care Toddler Care Preschool Care Afterschool Care Homework Assistance	Child Care Resource Pierce County Parks and Recreation YMCA
<b>Financial Literacy</b>	Financial Education Financial Coaching Debt Resolution Credit Repair	Adult Basic Education Community College University Community-based Organizations Sound Outreach Centers for Strong Families PCHA
<b>Legal Services</b>	Representation Document Review Counsel or Advice	ACLU Legal Aid NW Justice Project Tacoma Pro Bono
<b>Child/Adult Protective Services</b>	Needs Assessment Case Planning Information Referral Crisis Management	Senior Services Adult Services In-home Support Services Adult Abuse Hotline Child Abuse Hotline Foster Care Adoption Services

<b>Support Service General</b>	<b>Support Service Specific</b>	<b>Source/Partner</b>
<b>Crisis Services</b>	Crisis Assessment Crisis Intervention Crisis Management Crisis Resolution	Crisis Team Senior Crisis Team Poison Center Domestic Violence Shelter
<b>Mentoring</b>	Mentoring Match	Adult Basic Education Community College Workforce Investment Act Youth Programs Community-based Organizations
<b>Micro and Small Business Development</b>	Training Planning Technical Assistance Mentoring	Microbusiness Assistance Program Small Business Administration Business Incubator
<b>Homeownership</b>	Training Planning Debt Resolution	PCHA Housing Counseling Organization Community-based Organizations
<b>Debt Resolution</b>	Needs Assessment Case Planning Advocacy Negotiation	Sound Outreach Centers for Strong Families PCHA



#### **4-III.D. CERTIFICATION OF COORDINATION [24 CFR 984.201(D)(12)]**

The FSS action plan is required to contain a certification that the development of the activities and services under the FSS program has been coordinated with the JOBS program (now Welfare to Work under TANF), the programs under title I of the Workforce Innovation and Opportunity Act,, and any other relevant employment, child care, transportation, training, and education programs in the applicable area. The implementation of the FSS program's activities and services must continue to be coordinated as such to avoid duplication of activities and services.

##### PCHA Policy

PCHA certifies that its FSS program has developed its services and activities in coordination with programs under Title I of the Workforce Innovation and Opportunity Act, Workforce Investment Board and American Job Centers (also known as Workforce Centers or One Stop Career Centers), and any other relevant employment, child care, transportation, training, and education programs in the applicable area. The implementation of these activities and services will continue to be coordinated in this manner to avoid duplication of activities and services.

## **Chapter 5**

### **CONTRACT OF PARTICIPATION**

#### **INTRODUCTION**

Each family that is selected to participate in an FSS program must enter into a contract of participation with the PHA. This contract, which is signed by the head of the FSS family, sets forth the principal terms and conditions governing participation in the FSS program, including the rights and responsibilities of the FSS family and of the PHA, the services to be provided to the head of the FSS family and each adult member of the family who elects to participate in the program, and the activities to be completed by them. The contract also incorporates the individual training and services plan [24 CFR 984.303].

This chapter contains two parts:

Part I: Overview and Family Obligations: This part provides an overview of the form and content of the contract of participation and describes what the contract requires of FSS families.

Part II: Contract Specifications: This part explains the specifications of the contract, including terms and conditions, contract modification, contract terminations, and grievance procedures.

#### **PART I: OVERVIEW AND FAMILY OBLIGATIONS**

##### **5-I.A. OVERVIEW**

The purpose of the FSS contract of participation is to set forth the principal terms and conditions governing participation in the FSS program, including the incorporation of the individual training and services plan (ITSP) as part of the contract's required contents. The ITSP is meant to establish goals the FSS family will meet along the family's way to completing the contract and becoming self-sufficient. In addition to the goals specified in the ITSP, the contract also lists the responsibilities of the family and the PHA. This part covers the ITSP as part of the required contents of the contract of participation, and the family's obligations under the contract.

## **5-I.B. CONTENTS OF THE CONTRACT OF PARTICIPATION**

### **Individual Training and Services Plan**

There will only ever be one FSS contract of participation (CoP) at any time for each FSS family. As part of the required contents of the FSS contract of participation (CoP), the individual training and services plan (ITSP) establishes specific interim and final goals by which the PHA and the family measure the family's progress toward fulfilling its obligations under the contract of participation and becoming self-sufficient. Interim and final goals will differ depending on the family's individual needs. Regulations require the establishment of a final goal that includes both employment for the head of the FSS family and independence from welfare assistance for all family members regardless of age.

#### ***Interim Goals [24 CFR 984.303(b)(2)]***

PHAs must work with each participant to establish realistic and individualized goals and may not include additional mandatory goals or mandatory modifications of the two mandatory goals.

#### ***Individual Training and Service Plans for Other than FSS Head [24 CFR 984.103]***

An individual training and services plan is required for the head of the FSS family and all adults choosing to participate. ITSPs must be prepared for each adult family member participating. ITSPs are prepared by the PHA, in consultation with the participating family member [Notice PIH 93-24, G-16.

## 5-I.C. FAMILY OBLIGATIONS

### Compliance with Lease Terms [24 CFR 984.303(b)(3)]

One of the obligations of the FSS family according to the contract of participation is to comply with the terms and conditions of the Section 8 or public housing lease.

Inability to comply with the lease represents an inability to comply with the contract, therefore regulations regarding noncompliance with the FSS contract apply [see 24 CFR 984.303(b)(5)]. It is up to the PHA to determine the plan of action for FSS families found in noncompliance with the lease and how the PHA will precisely define the term *comply with the lease*. All considerations allowed for other assisted residents regarding violations of the lease, must also be allowed for FSS participants.

#### PCHA Policy

PCHA will define *comply with the lease* to mean the FSS family has not been evicted for repeated or serious violations of the lease as defined in the Section 8 Administrative Plan and public housing Admissions and Continued Occupancy Policy; or if they have been evicted for repeated and serious violations of the lease, the family has pursued their right to grieve, and the family has prevailed in either the grievance hearing or the informal hearing process.

PCHA's FSS program will not terminate the FSS contract of participation for failure to comply with the terms of the lease.

### **Employment Obligation [24 CFR 984.303 (b)(4)]**

Another obligation set forth by the contract of participation is for the head of the FSS family to *seek and maintain suitable employment* during the term of the contract and any extension. Although other members of the FSS family may seek and maintain suitable employment during the term of the contract, it is only a requirement for the head of the FSS family.

The obligation for the head of the FSS family to *seek employment* is defined in the regulatory language as meaning that the head of the FSS family has searched for jobs, applied for employment, attended job interviews, and has otherwise followed through on employment opportunities. However, this definition still leaves room for policy decisions on the part of the PHA because it does not define the level of activity involved in “seeking.”

There is no regulatory definition of *maintain suitable employment*. For this reason, it is up to the PHA to define the term. However, there can be no minimum period of time that the head of the FSS family must work.

With the agreement of the FSS family member, the PHA makes a determination of what it means to maintain suitable employment based on the skills, education, and job training of the FSS head of household, receipt of other benefits of the family member, and the available job opportunities within the jurisdiction served by the PHA. This means that the PHA must consult with the family member and agreement must be reached as to what *maintain suitable employment* is for that family member [24 CFR 984.303 (b)(4), Notice PIH 93-24, G-3].

#### PHA Policy

For purposes of the PHA’s FSS program, *seek employment* means the head of household has applied for employment, attended job interviews, and otherwise followed through on employment opportunities as outlined in the individual training and services plan of their contract of participation.

*Maintain suitable employment* is employment, on the last day of the contract, that is outlined in the individual training and service plan and is based on the skills, education, job training, and receipt of other benefits of the head of the FSS family. The PHA will require verification of this employment or enrollment.

## **5-I.D. CONSEQUENCES OF NONCOMPLIANCE WITH THE CONTRACT**

Consequences apply for families who do not meet the terms and conditions of the contract. The regulations require that the contract of participation specify that if the FSS family fails to comply, without good cause, with the terms and conditions of the contract (including compliance with the Section 8 or public housing lease), the PHA may:

- Withhold supportive services
- Terminate the family's participation in the FSS program

PHAs are not permitted to terminate a family's housing assistance due to the family's failure to meet its obligations under the contract of participation [24 CFR 984.101(d)].

### PCHA Policy

The contract of participation (CoP) will be terminated before the expiration of the contract term if the participant fails to meet, without "good cause," their obligations as outlined in the CoP. If the participant fails to meet its obligations outlined in the CoP, the FSS coordinator, or their designee, will first meet with the family to reassess the need for supportive services or a change in the individual training and services plan (ITSP).

If a reassessment of supportive services and a change in the ITSP is not successful in bringing the family in to compliance, the FSS coordinator will reassess the need for, and availability of, supportive services and refer the participant to a knowledgeable professional for a formal assessment of the challenges leading to the noncompliance.

The FSS Coordinator will use this formal assessment to identify and refer to resources that remove the challenge so the participant is able to meet their obligations outlined in the CoP.

Finally, if neither of these alternatives is successful, the FSS coordinator will terminate the CoP for failure to complete the tasks, interim goals, or final goals of the ITSP in a timely manner, and thus failure to complete the obligations outlined in the CoP.

The FSS coordinator will make an exception to the actions in terminating the CoP if the participant can, with the assistance of the FSS Coordinator, demonstrate "good cause" for the failure to meet its obligations as outlined in the CoP.

For purposes of the PHA FSS program, *good cause* includes circumstances beyond the control of the FSS family:

Family circumstances

Death in the family

Serious illness

Medical emergency

Mandatory court appearances

Involuntary loss of employment

Loss of head of household through death, incarceration, or removal from lease

Change in the ITSP improving progress toward economic self-sufficiency

Community circumstances

Significant reduction in workforce (over 20 percent reduction in employment field)

Significant interruption in service delivery (over 3 months interruption)

Provider noncompliance with regulation

Provider unable or unwilling to provide service

Provider offering inferior service

Active pursuit of a current or additional self-sufficiency goal

Resolution of a barrier to employment

Completion of a college degree or technical training

Completion of a work-related certification

Credit repair towards homeownership readiness

## **PART II: CONTRACT SPECIFICATIONS**

### **5-II.A. OVERVIEW**

In addition to making clear the family's obligations under the program, the contract of participation contains specific terms and conditions, including those governing contract modifications, terminations, and grievance procedures. This part describes those specifications and associated policy.

### **5-II.B. CONTRACT TERM [24 CFR 984.303(c)]**

The contract term is five years. This means that the family has no more than five years from the effective date of the contract of participation (CoP) to fulfill their obligations as specified in the contract. This five year term requirement will be specified in the CoP.

#### **Contract Extension [24 CFR 984.303(d)]**

While the term set forth in the contract of participation is for five years, contract extensions are available. According to regulation, PHAs must for "good cause" extend the term of the contract for a period not to exceed two years for any FSS family that requests an extension of the contract in writing or verbally. The family's written or verbal (documented by the FSS Coordinator) request for an extension must include a description of the need for the extension. *Good cause* means circumstances beyond the control of the FSS family, as determined by the PHA, such as a serious illness or involuntary loss of employment (further defined by PHA policy in Section 5-I.D.). Extension of the contract of participation will entitle the FSS family to continue to have amounts credited to the family's FSS account.



### **5-II.C. MODIFICATION OF THE CONTRACT**

The contract of participation (CoP) may be modified, as long as the PHA and the FSS family mutually agree to modify it. This includes modifications in writing with respect to the individual training and services plans (ITSPs), the contract term (See Section 5-II.B. above), and designation of the head of the family [24 CFR 984.303(f)]. The conditions under which the PHA will modify the contract are set forth in the policy below.

#### **PCHA Policy**

In PCHA's FSS program, the CoP will be modified by mutual agreement between PCHA and the FSS head of household:

When modifications to the ITSP improve the participant's ability to complete their obligations in the CoP or progress toward economic self-sufficiency.

When the actual end date of the CoP is determined by the effective date of the FSS family's first reexamination changes the end date of the CoP.

When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, , designate another family member to be the FSS head of household and receive escrow funds.

When an FSS family moves to the jurisdiction of a receiving PHA that does not have an FSS program and the family may not continue participation in the FSS program, and modification of the FSS contract will allow the family to complete the contract and receive an escrow disbursement or terminate the contract with escrow disbursement.

#### **5-II.D. COMPLETION OF THE CONTRACT**

By regulation, the contract of participation is considered to be completed when the head of household is employed and the FSS family has fulfilled all of its obligations under the contract of participation, including all family members' ITSPs, on or before the expiration of the contract term, including any extension thereof.

Policies on verifying completion of the contract of participation can be found in Section 6-I.C. of this action plan.

#### **5-II.E. TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE**

Even after a family has completed the contract of participation, a PHA may continue to offer appropriate FSS supportive services to a former completed FSS family. If the family still resides in Section 8 or public housing, these supportive services would be offered for becoming self-sufficient. If the family no longer resides in Section 8 or public housing, these supportive services would be offered for becoming self-sufficient or remaining self-sufficient. Transitional services for families who no longer reside in Section 8 or public housing, may only be offered using sources that are not HUD funds or HUD restricted funds [24 CFR 984.303(j)].

##### PCHA Policy

PCHA will continue to offer supportive services to a former FSS family who has completed its contract of participation.

## **5-II.F. TERMINATION OF THE CONTRACT**

### **Termination of the Contract with Escrow Distribution [24 CFR 984.303(k)]**

The contract of participation will be terminated with escrow distribution before the expiration of the contract term, during any extension of the contract, or at end of the term of the contract if all obligations under such have not been met, when:

- Services that the PHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable, as described in Section 5-II.H. of this Action Plan. This type of termination is also referred to as "nullification" in the FSS regulations at 24 CFR 984.
- The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the PHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family; or

An FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR 982.353) for good cause and continuation of the CoP after the move or completion of the CoP prior to the move is not possible. PHAs must be consistent in their determinations of whether a family has good cause for a termination with FSS escrow disbursement.

### **Termination of the Contract without Escrow Distribution [24 CFR 984.303(h)]**

The contract of participation may be terminated before the expiration of the contract term and any extension of the contract by the following:

- Mutual consent of the parties
- Failure of the FSS family to meet its obligations under the contract of participation without good cause, including in a Section 8 FSS program the failure to comply with the contract requirements because the family has moved outside the jurisdiction of the PHA
- The family's withdrawal from the FSS program
- Such other act as is deemed inconsistent with the purpose of the FSS program
- Operation of law

### PCHA Policy

The CoP will be terminated before the expiration of the contract term, and any extension thereof, for any of the following reasons

Mutual consent of the parties.

Family's withdrawal from the FSS program.

Failure of the FSS family to meet its obligations under the contract of participation without good cause. *Good cause* for the purposes of the FSS program is also defined in Section 5-I.D. of this Action Plan.

Such other act as is deemed inconsistent with the purpose of the FSS program.

Operation of law.

If the FSS family faces termination due to failing to meet, without good cause, its obligations under the CoP, the PHA will follow the relevant policy specified in Section 5-I.D. of this action plan.

**Note:** If the family is unable to meet the requirements of the contract of participation because essential services are not available, the contract is *nullified*, not terminated.

In addition, the contract of participation is automatically terminated if the family's Section 8 assistance is terminated in accordance with HUD requirements [24 CFR 984.303(h)].

#### **5-II.G. OPTION TO WITHHOLD SUPPORTIVE SERVICE [24 CFR 984.303(b)(5)(i)]**

As touched upon in Section 5-I.D. of this action plan, the PHA has the option to withhold supportive services or the FSS family's participation in the FSS program if the PHA determines that the FSS family has failed to comply without good cause with the requirements of the contract of participation.

PHAs are not permitted to terminate Section 8 assistance to a family due to the family's failure to meet its obligations under the contract of participation [24 CFR 984.101(d)].

#### **5-II.H. PHA OBLIGATION TO MAKE GOOD FAITH EFFORT TO REPLACE UNAVAILABLE SUPPORT SERVICES [24 CFR 984.303(e)]**

PHAs must make an extensive good faith effort to replace services that community agencies either cannot or will not provide. If all of the steps below are exhausted without the provision of an integral service, the contract of participation can be ended ahead of time as a result. This, however, should only occur as a last resort. The PHAs good faith effort must be demonstrated by taking the following steps:

- If a social service agency fails to deliver the supportive services pledged under an FSS family member's individual training and services plan (ITSP), the PHA must make a good faith effort to obtain these services from another agency.
- If the PHA is unable to obtain the services from another agency, the PHA must reassess the family member's needs and determine whether other available services would achieve the same purpose.
- If other available services would not achieve the same purpose, the PHA shall determine whether the unavailable services are integral to the FSS family's advancement or progress toward self-sufficiency.
- If the unavailable services are not integral to the FSS family's advancement toward self-sufficiency, the PHA must revise the ITSP, delete these services, and modify the contract of participation to remove any obligation on the part of the FSS family to accept the unavailable services.
- If the unavailable services *are* determined to be integral to the FSS family's advancement toward self-sufficiency (which may be the case if the affected family member is the head of the FSS family), the PHA shall terminate the contract of participation and follow the requirements in Section 5-II.F. of this Action Plan.

Termination of the contract of participation based on unavailability of supportive services shall never be grounds for termination of Section 8 or public housing assistance.

## **5-II.I. GRIEVANCE PROCEDURES**

When adverse action is taken by the PHA against a family, the PHA is required to provide a grievance hearing in the public housing program, or an informal hearing in the Section 8 program [24 CFR 966 subpart B, 24 CFR 982.554].

According to regulatory requirements, the FSS action plan must contain the grievance and hearing procedures available for FSS families against whom the PHA has taken adverse action with regards to FSS [24 CFR 984.201(d)(9)].

### PCHA Policy

The grievance and informal hearing procedures for the FSS program will be the same as the grievance and hearing procedures adopted for the Section 8 and public housing programs in the PHA's admissions and continued occupancy policy and administrative plan, respectively (See Chapter 16, pages 11-18 of the Administrative Plan and Chapter 14, pages 1-20 of the ACOP).

Adverse actions taken within the FSS program include:

- Denial of admission into the FSS program
- Denial of request for supportive services
- Denial of request to change the ITSP
- Denial of request to change the head of household
- Denial of request for interim disbursement of the escrow account
- Denial of request to complete the CoP
- Denial of a request for extension to the FSS CoP
- Denial of request for either interim or final distribution of escrow account
- Withholding of support services
- Termination of the FSS CoP
- Denial of request for termination with escrow
- Denial of transitional services

## Chapter 6

### ESCROW ACCOUNT

#### INTRODUCTION

The establishment of an escrow account is offered as a support and financial incentive to families for participation in the FSS program. Generally, under this incentive, the amount of an increase in family rent resulting from an increase in earned income is escrowed. That is, usually a family's rent or share of the rent goes up when the family experiences an increase in earned income. In the FSS program, this is still the case, and the part of the rent representing the increase is deposited into an account as an escrow credit. The funds from this escrow account then become available to FSS families upon successful completion of their contracts of participation and may become available earlier at the housing authority's option.

This chapter explains how the FSS escrow account works, including calculating the amount of the escrow credit, disbursing the funds, and the proper way for the PHA to manage and report on the account.

This chapter contains two parts:

Part I: The Escrow Account: This part provides an overview of how the escrow account works, including calculating the escrow credit and disbursing the funds upon completion of the contract of participation.

Part II: Escrow Fund Accounting and Reporting: This part describes the requirements for managing the escrow account, including both accounting and reporting requirements.

#### PART I: THE ESCROW ACCOUNT

##### 6-I.A. OVERVIEW

As an integral incentive to the FSS program, it is especially important to have clear-cut policy spelling out how the escrow account works. This includes policy regarding the calculation of the FSS credit amount, the disbursement of FSS account funds, the use of account funds for homeownership, and forfeiture of the FSS escrow account.

## **6-I.B. CALCULATING THE FSS CREDIT AMOUNT**

### **Determination of Baseline Annual Earned Income and Baseline Monthly Rent**

When determining the family's baseline annual earned income and the baseline monthly rent amounts for purposes of computing the FSS escrow credit, the PHA must use the amounts on the family's most recent income reexamination in effect.

For purposes of determining the FSS credit, baseline monthly rent for families paying an income-based rent is the family's Total Tenant Payment (TTP) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract.

For families in public housing who are paying either flat or ceiling rent, family rent is the amount of the flat rent (including the applicable utility allowance) or ceiling rent (including any hardship discounts) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract [24 CFR 984.103(b)].

### **Determination of the Escrow Credit**

To calculate the FSS credit, the PHA must accurately determine the family's baseline earned income and baseline monthly rent and compare those figures with the family's current earned income and current monthly rent. The FSS credit is the lesser of 30 percent of one-twelfth or 2.5 percent of the amount by which the family's current annual earned income exceeds the family's baseline annual earned income; or the increase in the family's monthly rent. The increase in the family's monthly rent is the lower of either the amount by which the family's current monthly rent exceeds the family's baseline monthly rent, or for Section 8 families, the difference between the baseline monthly rent and the current gross rent (*i.e.*, rent to owner plus any utility allowance) or the payment standard, whichever is lower [24 CFR 984.305(b)(2)].

### **Determination of Escrow Credit for Families Who Are Not Low Income**

FSS families who are not low-income families are not entitled to any FSS credit [24 CFR 984.305(b)(2)].

### **Increases in FSS Family Income [24 CFR 984.304]**

As described in the FSS credit calculations above, any increases in family earned income resulting in increases in family rent are deposited in the escrow account. For this reason, and because of the nature of the FSS account, any increase in the earned income of an FSS family during its participation in an FSS program may not be considered as income or an asset for purposes of eligibility of the FSS family for other benefits, or amount of benefits payable to the FSS family, under any other program administered by HUD.

### **Cessation of FSS Credit [24 CFR 984.305(b)(4)]**

The PHA will not make any additional credits to the FSS family's FSS account when the family has completed the contract of participation, when the contract of participation is terminated, when the family is not low-income, or during the time a Section 8 family is in the process of moving to a new unit.



## **6-I.C. DISBURSEMENT OF FSS ACCOUNT FUNDS**

### **Disbursement Before Completion of Contract**

**The PHA may at its sole option disburse FSS account funds before completion of the contract if the family needs a portion of the funds for purposes consistent with the contract of participation and the PHA determines that the FSS family has fulfilled certain interim goals established in the contract of participation. These interim disbursements could include using the funds to assist the family in meeting expenses related to completion of higher education (e.g., college, graduate school) or job training, or to meet start-up expenses involved in creation of a small business [24 984.305(c)(2)(ii)].**

#### **PCHA Policy**

**PCHA will disburse a portion of the FSS escrow account funds before completion of the CoP when the family has met certain interim goals, which means the family has met all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date, and:**

**Requested funds are needed to complete an interim goal or task within the CoP and are not ongoing expenses.**

**OR**

**The family has demonstrated that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.**

### **Disbursement at Completion of Contract [24 CFR 984.305(c)(1) and 24 984.305(c)(2)(i)]**

When the contract has been completed, at or before the expiration date, according to regulation, the amount in the FSS account in excess of any amount the FSS family owes to the PHA under the public housing lease will be paid to the head of the FSS family. To receive the disbursement, the head of the FSS family must submit a certification (as defined in 24 CFR 984.103) to the PHA at the time of contract completion that, to the best of his or her knowledge and belief, no member of the FSS family is a recipient of welfare assistance.

### **Disbursement at Contract Termination [24 CFR 984.305(c)(3)]**

The PHA must disburse to the family its FSS escrow account funds in excess of any amount owed to the PHA under the public housing lease when the contract has been terminated in certain circumstances. These circumstances include services are not available to the family that the PHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency, when the head of the FSS family becomes permanently disabled and unable to work during the period of the contract (unless the PHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family), or when an FSS family moves outside the jurisdiction of the PHA and continuation of the CoP after the move is not possible according to the regulations. In circumstances where a family is not able to continue in FSS after the move, it is also possible for the PHA and the family to determine if the contract can be modified to make completion and receipt of the escrow monies, possible. PHAs must be consistent in their determinations of whether a family has good cause for a termination with FSS escrow disbursement.

### **Verification of Family Certification at Disbursement**

The PHA must verify that the family has met the requirements of either interim, final, or termination of contract with escrow. Interim disbursement may only occur after the family has completed certain interim goals and funds are needed to complete other interim goals. Final disbursement can only occur after the family has completed the contract of participation and all members are welfare-free as defined by regulation. Disbursement at contract termination only occurs if the family circumstances involve an integral missing service, the disability of the FSS head of household, or an FSS family porting out of the jurisdiction of the PHA and HUD regulations do not allow continuation of the FSS contract. In each of these circumstances, it follows that the PHA may require verification for the completion of interim goals or the contract of participation.

At interim disbursement and before final disbursement of the FSS account funds to the family, the PHA may verify that the FSS family is no longer a recipient of welfare assistance by requesting copies of any documents which may indicate whether the family is receiving any welfare assistance, and by contacting welfare agencies [24 CFR 984.305(c)(4)].

HUD provides verification guidance in Notice PIH 2018-18. This guidance is mandatory for the Section 8 and public housing programs. The PHA's Administrative Plan or ACOP must contain verification policies following the hierarchy in this notice. The policies contained in the PHA's ACOP and Administrative Plan cover verification policies related to the FSS program in general. However, determining the need for interim disbursements may require more clarification as to what constitutes an acceptable third-party source.

### PCHA Policy

PCHA will require verification that the FSS family has completed certain interim goals, has completed the contract of participation, has met the requirements for termination with disbursement of escrow and that the FSS family is no longer a recipient of welfare assistance, as relevant, before making interim and final disbursements.

PCHA will follow HUD's verification hierarchy set forth in Notice PIH 2018-18 to make these verifications, including the guidance therein regarding documentation. However, the PHA will use a *knowledgeable professional* as a third-party source to verify the need for interim disbursements.

### **Succession to FSS Account [24 CFR 984.305(d)]**

FSS account funds should be disbursed to the head of the FSS family. However, if the head of the FSS family no longer resides with the other family members in Section 8 or public housing, the remaining members of the FSS family, after consultation with the PHA, have the right to designate another family member to receive the funds.

#### **6-I.D. USE OF FSS ACCOUNT FUNDS FOR HOMEOWNERSHIP**

According to regulation, a Section 8 or public housing FSS family may use their the final distribution of FSS account funds for the purchase of a home, including the purchase of a home under one of HUD's homeownership programs, or other federal, state, or local homeownership programs, unless the use is prohibited by the statute or regulations governing the particular homeownership program [24 CFR 984.305(e)].

Homeownership is just one option for use of the FSS account funds. PHAs may not restrict the use of escrow funds at contract completion [Notice PIH 93-24, C-13].

#### **6-I.E. USE OF FORFEITURE OF FSS ACCOUNT FUNDS**

Amounts in the FSS account will be forfeited when the contract of participation is terminated without escrow disbursement, or when the contract of participation is completed by the family (see Section 5-II.D. of this action plan) but the FSS family is receiving welfare assistance at the time of expiration of the term of the contract of participation, including any contract extension [24 CFR 984.305(f)(1)].

Use of forfeited escrow accounts is described in detail in Section 3-I.F. of this FSS Action Plan.

##### **Treatment of Forfeited FSS Account Funds**

**FSS escrow account funds forfeited by the FSS family must be used by the PHA for the benefit of the FSS participants. These funds may only be used for support for FSS participants in good standing. These supports include transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP; or training for FSS Program Coordinator(s). Forfeited FSS escrow accounts may not be used for salary and fringe benefits of FSS Program Coordinators, general administrative costs of the FSS program, for housing assistance payments (HAP) expenses or public housing operating funds. Accounting Brief 26 describes the accounting requirements in the treatment of forfeited escrow accounts.**

## **PART II: ESCROW FUND ACCOUNTING AND REPORTING**

### **6-II.A. OVERVIEW**

Regulations set forth specific requirements involving the accounting and reporting for the FSS escrow account. This part describes those requirements and the PHA policy necessary for managing the account from the PHA perspective.

### **6-II.B. ACCOUNTING FOR FSS ACCOUNT FUNDS**

When establishing FSS escrow accounts, the PHA must deposit the FSS account funds of all families participating in the PHA's FSS program into a single depository account for each (Section 8 or public housing) program. These funds are determined at each reexamination after the effective date of the contract and must be **deposited each month** to each family's subsidiary line item in the PHA's escrow account. In addition, the funds held in this account must be invested in one or more of the HUD-approved investments [24 CFR 984.305].

#### **Crediting the Escrow Account [24 CFR 984.305(a)(2)(i)]**

The total of the combined FSS account funds will be supported in the PHA accounting records by a subsidiary ledger showing the balance applicable to each FSS family. During the term of the contract of participation, the PHA must credit the amount of the FSS credit (see Section 6-I.B.) to each family's FSS account every month.

#### **Proration of Investment Income [24 CFR 984.305(a)(2)(ii)]**

Because the FSS account funds are to be invested, the investment income for those funds in the FSS account will also need to be credited to each family's account subsidiary line item. By regulation, these funds are to be prorated and credited to each family's FSS account based on the balance in each family's FSS account at the end of the period for which the investment income is credited.

#### PHA Policy

Each quarter the full amount of the investment income for funds in the public housing and/or Section 8 FSS account will be prorated and credited to each family's subsidiary line item after the deduction of unpaid rent and other amounts due under the public housing and/or Section 8 lease.

## **Reduction of Amounts Due by FSS Family [24 CFR 984.305(a)(2)(iii)]**

### ***At Completion for Monies Owed to the PHA by the Family***

If the FSS family has not paid the family contribution towards rent, or other amounts, if any, due under the public housing or Section 8 lease, the balance in the family's FSS account shall be reduced by that amount (as reported by the owner to the PHA in the Section 8 FSS program) at the time of final disbursement of FSS escrow funds.

### ***Before Completion for Underreported Income***

#### ***At Baseline When the Family Joins FSS for Underreported Income***

If the FSS family has underreported income after the baseline annual income is set, the amount credited to the FSS account will be based on the income amounts originally reported by the FSS family.

#### ***After Baseline When Family is in FSS for Underreported Income***

If the FSS family is found to have under-reported income in the reexamination used to set the baseline, the escrow for the entire period of the CoP will be recalculated using the correct income to set the baseline and then calculate subsequent escrow amounts.

## **6-II.C. REPORTING ON THE FSS ACCOUNT**

Each PHA must make a report, at least once annually, to each FSS family on the status of the family's FSS account.

At a minimum, the report must include [24 CFR 984.305(a)(3)]:

- The balance at the beginning of the reporting period
- The amount of the family's rent payment that was credited to the FSS account, during the reporting period
- Any deductions made from the account for amounts due the PHA before interest is distributed
- The amount of interest earned on the account during the year
- The total in the account at the end of the reporting period

### **PHA Policy**

The PHA will provide FSS participants an annual statement on the status of their FSS escrow account.

## **Chapter 7**

### **PORTABILITY IN SECTION 8 FSS PROGRAMS**

#### **INTRODUCTION**

PHAs operating Section 8 FSS programs must be familiar with the rules and regulations regarding portability under the Section 8 program. As with the case of portability in the Section 8 program in general, the FSS family may move outside the initial PHA jurisdiction under portability procedures after the first 12 months of the FSS contract of participation [24 CFR 984.306].

In the event that an FSS family chooses to exercise portability, certain special requirements regarding the FSS program would apply. This chapter describes the obligations of the initial PHA, the receiving PHA, and the FSS family under portability, in addition to any special stipulations regarding portability in the FSS context.

This chapter contains two parts:

Part I: Portability in the FSS Program: This part provides a general overview of portability in the FSS program, including the residency requirements for FSS portability and management of the contract of participation when a family moves into or from another PHA's jurisdiction.

Part II: The Effects of Portability on FSS Regulations and Policy: This part describes the specific ways in which portability affects different aspects of the FSS program, including the escrow account, program termination, loss of the FSS account, and termination of Section 8 program assistance.

#### **PART I: PORTABILITY IN THE FSS PROGRAM**

##### **7-I.A. OVERVIEW**

Portability is a statutory feature of the Section 8 program—it is included in the law. As such, PHAs operating a Section 8 FSS program need to understand the effects that portability will have on Section 8 FSS families and program operation. This part provides a general overview of portability in the FSS program, including the residency requirements for FSS portability and management of the contract of participation when a family moves into or from another PHA's jurisdiction.

## **7-I.B. DEFINITIONS**

For the purposes of portability with regards to the FSS program, the following definitions will be used [24 CFR 982.4, 24 CFR 984.306].

- *Initial PHA* means both:
  1. A PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and
  2. A PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.
- *Receiving PHA* means a PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA either absorbs the family into its program, including issuing a voucher and providing rental assistance to the family, or bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher.
- *Relocating FSS Family* refers to an FSS family that moves from the jurisdiction of a PHA at least 12 months after signing its contract of participation.

## **7-I.C. RESIDENCY REQUIREMENTS**

Families participating in a Section 8 FSS program are required to lease an assisted unit within the jurisdiction of the PHA that selected the family for the FSS program for a minimum period of 12 months after the effective date of the contract of participation. However, the initial PHA may approve a family's request to move outside its jurisdiction under portability during this period if the move is in accordance with the regulations at 24 CFR 982.353 [24 CFR 984.306(a)(1)].

### PCHA Policy

PCHA will approve a family's request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation if the move is in accordance with the regulations for such moves at 24 CFR 982.353.

After the first 12 months of the FSS contract of participation, the FSS family may move outside the initial PHA jurisdiction under portability procedures regardless of PHA approval [24 CFR 984.306(a)(2)].



## **7-I.D. PORTABILITY REQUIREMENTS FOR FSS PARTICIPANTS**

### **Receiving PHA Administers an FSS Program [24 CFR 984.306(b)]**

Whether the receiving PHA bills the initial PHA or absorbs the FSS family into its Section 8 program, the receiving PHA must enroll an FSS family in good standing in its FSS program. However, if the receiving PHA is already serving the number of FSS families identified in its FSS Action Plan and determines that it does not have the resources to manage the FSS contract or the receiving PHA, the initial PHA may agree to the FSS family's continued participation in the initial PHA's FSS program. Prior to the PHAs agreeing to the continued participation, the initial PHA must determine that the relocating FSS family has demonstrated that, notwithstanding the move, it will be able to fulfill its responsibilities under the initial or a modified contract at its new place of residence.

#### PCHA Policy

PCHA, as the initial housing authority, will agree to the participant's continued participation in their FSS program so long as the relocating family has demonstrated, with the assistance of the FSS Coordinator, that it will be able to fulfill its responsibilities under the initial or a modified contract at its new place of residence.

Where continued FSS participation is not possible, the initial PHA **must** clearly discuss the options that may be available to the family. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or termination of the FSS contract and forfeiture of escrow.

#### PCHA Policy

PCHA will clearly discuss the options that are available to the family where continued FSS participation is not possible. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

### **Receiving PHA Does Not Administer an FSS Program [24 CFR 984.306(c)]**

If the receiving PHA does not administer an FSS program and the receiving PHA is absorbing the voucher, the FSS family may not continue participation in the FSS program. The initial PHA must clearly discuss the options that may be available to the family. These may include, but are not limited to, modification of the FSS contract, locating a receiving PHA that administers an FSS program, termination of the FSS contract with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

#### PCHA Policy

PCHA will, as stated above, clearly discuss the options that may be available to the family where continued FSS participation is not possible. Depending on the family's contract specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or termination of the FSS contract and forfeiture of escrow.

If the receiving PHA does not administer an FSS program and the receiving PHA is administering the voucher, the FSS family may continue participation in the FSS program. The initial PHA must clearly discuss the options that may be available to the family. These may include, but are not limited to, modification of the FSS contract, locating a receiving PHA that administers an FSS program, termination of the FSS contract with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

#### PCHA Policy

PCHA, as the initial housing authority, will agree to the participant's continued participation in their FSS program so long as the relocating family has demonstrated, with the assistance of the FSS Coordinator, that it will be able to fulfill its responsibilities under the initial or a modified contract at its new place of residence.

A chart summarizing portability impact on an FSS family follows.

## PORTABILITY FSS IMPACT ON FSS FAMILY

Family FSS Status		PHA FSS Status	Port Scenario	FSS Impact	PHA or HUD Decides
1.	FSS family ports	Receiving PHA has FSS program  Initial PHA has FSS program	Billed	Family may continue participation in initial PHA's FSS program  or  Family may enroll in receiving PHA's FSS program	Determined by the initial PHA.    Determined by the receiving PHA.
2.	FSS family ports	Receiving PHA has FSS program  Initial PHA has FSS program	Absorbed	Family may enroll in receiving PHA's FSS program  or  Family may continue participation at initial PHA's FSS program.	Determined by the receiving PHA.   Determined by the receiving PHA.  *Agreement from the receiving PHA is needed because they would be responsible for most of the FSS tasks under this scenario.
3.	FSS family ports	Receiving PHA does not have FSS program    Initial PHA administers FSS program	Billed	Family may continue participation in initial PHA's FSS program	First, determined by the initial PHA. Then, receiving PHA must agree.  *The receiving PHA would be responsible for submitting the FSS information for the family into IMS/PIC.  Receiving PHA's determination must be based on an undue financial or administrative hardship such as the cost of adding an FSS module to their existing systems.  If continued participation is agreed to by the PHAs, the initial PHA must provide the receiving PHA with timely and complete FSS addendum information and the receiving PHA is responsible for timely and accurate submission of the FSS information into IMS/PIC.
4.	FSS family ports	Receiving PHA does not have FSS program    Initial PHA administers FSS program	Absorbed	Family may not continue participation in initial PHA's FSS program	Determined by HUD.  The receiving PHA would be responsible for managing escrow and the receiving PHA does not administer an FSS program.

### **Single Contract of Participation**

If the FSS family enrolls in the receiving PHA's FSS program, the receiving PHA will enter a new contract with the FSS family for the term remaining on the contract with the initial PHA. The initial PHA will end its contract with the family.

If the FSS family remains in the FSS program of the initial PHA, pursuant to this section, the contract executed by the initial PHA will remain as the contract in place.

### **Termination of FSS contract and Forfeiture of Escrow Account [984.306(e)]**

If an FSS family relocates to another jurisdiction and is unable to fulfill its obligations under the contract, including any modifications, the PHA, which is a party to the contract, **must terminate the FSS family from the FSS program**. The family's FSS escrow account will be forfeited.

Termination of FSS program participation and forfeiture of FSS escrow must be used only as a last resort after the PHA determines, in consultation with the family, that the family would be unable to fulfill its obligations under the contract after the move, that locating another receiving housing authority with a FSS program is not possible, that the current contract cannot be modified to allow for completion prior to porting, and that the current contract cannot be terminated with FSS escrow disbursement. When termination is the only option, the PHA must clearly notify the family that the move will result in the loss of escrow funds. The PHA must follow its policy for clearly notifying the FSS family of the forfeiture.

## **7-I.E. NEW FSS ENROLLMENT INTO RECEIVING PHA'S FSS PROGRAM**

### **Administering and Billing of the Voucher**

If a non-FSS family ports and the receiving PHA bills the initial PHA, the receiving PHA may, consistent with the receiving PHA's FSS enrollment policies, enroll a family that was not an FSS participant at the initial PHA into its FSS program if and only if the initial PHA manages an FSS program and agrees to such enrollment. If the receiving PHA bills the initial PHA, but the initial PHA does not manage an FSS program, the family may not enroll in the receiving PHA's FSS program.

#### PCHA Policy

PCHA, as the receiving PHA, will enroll a non-FSS family who is porting when the initial PHA manages an FSS program, the initial PHA is being billed for the housing assistance payments, and the initial PHA agrees to the family enrolling in the receiving PHA's FSS program.

### **Absorption of the Voucher**

If the receiving PHA absorbs the family into its Section 8 program, the receiving PHA may, consistent with the receiving PHA's FSS enrollment policies, enroll a family that was not an FSS participant at the initial PHA into its FSS program.

## **PART II: REPORTING**

### **7-II.A. OVERVIEW**

Each PHA that carries out an FSS program shall submit to HUD, in the form prescribed by HUD, a report regarding its FSS program.

### **7-II.B. CONTENTS OF THE FSS REPORT [24 CFR 984.401]**

The report submitted to HUD must include a description of the activities carried out in the FSS program; a description of the effectiveness of the program in assisting families to achieve economic independence and self-sufficiency, including the number of families enrolled and graduated and the number of established escrow accounts and positive escrow balances; a description of the effectiveness of the program in coordinating resources of communities to assist families to achieve economic independence and self-sufficiency; and any recommendations by the PHA or the appropriate local Program Coordinating Committee for legislative or administrative action that would improve the FSS program and ensure the effectiveness of the program.

### **7-II.C. FAMILY SELF-SUFFICIENCY GRANT PROGRAM REVIEW PHA SELF-ASSESSMENT**

HUD provides a detailed checklist for PHAs to conduct their own self-assessment of their FSS program. The form is administered by the local field office and allows each PHA to gather concrete and comprehensive data covering aspects of the program from FSS Action Plans and Composite Scores through FSS program size, participants, and graduations to reductions in FSS grants and current Memoranda of Agreement with community partners. The detailed example of the FSS Self-Assessment is available at HUD's FSS Resource page, which can be located by searching "HUD FSS" on any browser.



## PIERCE COUNTY HOUSING AUTHORITY

603 South Polk Street, Tacoma, WA 98444 | 253-620-5400

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### RESOLUTION 1919

#### APPROVING RAISING THE CAPITALIZATION THRESHOLD TO \$5,000.00

WHEREAS, the Pierce County Housing Authority has adopted a Capitalization Threshold of \$200.00 for all Equipment Costs and a Capitalization Threshold of \$2,500.00 for all Building and Property Improvements in 2020, and;

WHEREAS, the federal and state Capitalization Threshold for both categories is \$5,000.00, and;

WHEREAS, the Capitalization of smaller non-Attractive assets is not considered a best practice by the Government Finance Officers Association and the minimum recommended capitalization threshold is \$5,000.00, and;

WHEREAS, Pierce County Housing Authority has been advised by its financial consultants to raise the Capitalization Threshold to \$5,000.00;

WHEREAS, this increase excludes Small and Attractive Assets, which includes all computers, tablets, smartphones, and A/V Equipment with unit costs of \$300.00 or more, in order to be in compliance with the policies laid out in the State Administrative and Accounting Manual, Chapter 30;

NOW THEREFORE BE IT RESOLVED that the Capitalization Threshold be raised to \$5,000.00 for Buildings and Property Improvements and Equipment Costs, effective immediately.

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Signature of the Chair of the Board

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Date

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Signature of the Executive Director

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Date



## **PIERCE COUNTY HOUSING AUTHORITY**

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### **APPENDIX B: SUPPORTING DOCUMENTS FOR RESOLUTION 1919 APPROVING THE RAISE OF THE CAPITALIZATION THRESHOLD TO \$5,000.00**

### 5.3.3 Inventory Counts – Fixed Assets, Appliances and Equipment

The Finance Director or other designee as appointed by the Executive Director shall coordinate a physical inspection of assets, appliances and equipment as follows below. Coordination of the physical inspections shall ensure adequate segregation of duties and responsibilities to assist with the prevention of loss, theft, abuse or misappropriation of the Authority's fixed assets and other equipment.

Dwelling Unit Appliances. All dwelling unit appliances assigned to occupied units are likely in place and shall not be required to be physically inspected. A physical inspection of appliances assigned to vacant dwelling units shall be conducted at least once annually to ensure assets assigned to units according to the inventory log are in place.

Non-dwelling Equipment. A physical inspection of non-dwelling equipment shall be conducted at least once bi-annually to ensure assets listed in the inventory log are in place.

Additionally, all Unit Turns shall include a physical inspection and comparison to inventory logs.

### 5.3.4 Fixed Asset Capitalization & Depreciation

Equipment Acquisitions. Equipment acquisitions with a useful life expectancy of greater than one year and costing more than \$5,000 shall be capitalized by the Authority and depreciated. Capitalization under this guideline requires that the Authority write off the book value of the asset or any portion of the asset being replaced.

~~Appliance Acquisitions. All appliance replacements to include dishwashers, washers, dryers, stoves, ovens, ranges, and refrigerators, with a useful life expectancy of greater than one year shall be capitalized by the Authority and depreciated. Capitalization under this guideline requires that the Authority write off the book value of the asset being replaced.~~

Building and Property Improvements, Betterments or Additions. Building and property improvements or additions with a useful life expectancy of greater than one year and costing more than \$5,000, and either increase the rental revenue productivity or increase the useful life of the major asset, shall be capitalized by the Authority and depreciated. Building or property betterments, improvements, or addition types (i.e. roof replacements, painting, fencing) generally approved by HUD as capital work items shall also be capitalized. Capitalization under this guideline requires the Authority to write off the book value of the asset or any portion of the asset being replaced. This may require estimating the original cost of a portion of a building using a deflated current replacement cost methodology or other reasonable method.

Floor Covering Replacement. All floor-covering replacements shall be capitalized by the Authority and depreciated. Capitalization under this





## PIERCE COUNTY HOUSING AUTHORITY

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### RESOLUTION 1920 ADOPTING THE MEAL AND REFRESHMENT POLICY

WHEREAS, Pierce County Housing Authority (the Authority) has no current policy on the purchase of food and beverages for employees, commissioners, and members of the public, and;

WHEREAS, appropriate guidelines for such purchases are necessary to ensure the fair, equitable, reasonable, and responsible expenditure of the Authority's funds, and;

WHEREAS, it has been recommended by financial consultants to adopt a Meal and Refreshment Policy;

NOW THEREFORE BE IT RESOLVED that Pierce County Housing Authority adopts the Meal and Refreshment Policy, effective immediately.

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Signature of the Chair of the Board

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Date

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Signature of the Executive Director

---

Date



## **PIERCE COUNTY HOUSING AUTHORITY**

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### **APPENDIX C: SUPPORTING DOCUMENTS FOR RESOLUTION 1920 ADOPTING THE MEAL AND REFRESHMENT POLICY**



## PIERCE COUNTY HOUSING AUTHORITY

603 South Polk Street, Tacoma, WA 98444 | 253-620-5400

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### MEAL & REFRESHMENT POLICY

Effective Wednesday, September 28<sup>th</sup>, 2022

#### PURPOSE

This establishes a policy for the purchase of refreshments and meals with Authority funds or submitted for reimbursement. The policy includes the direct purchases made via purchase order or PCHA credit card.

#### LEGAL BASIS & SCOPE

This policy is based on the Washington State Attorney General opinion dated May 14, 1987. It supersedes any previous or current PCHA policy and does not obligate PCHA to provide light refreshments or meals. Under no circumstances may alcohol be provided at PCHA's expense.

When refreshments or meals are being purchased, the public purpose must be documented with the following information using the attached form:

- Nature of the occasion
- Public purpose or policy objective met by having refreshments or a meal
- Attendees listed

No funds for meals or light refreshments can be drawn from federal funding sources. All funding must come from other sources.

#### ALLOWABLE EXPENSES

The reasonable cost of light refreshments (general beverages and light foods that are generally referred to as “snacks” and eaten between meals; cookies, fruits, vegetable platters, crackers, cheese, and similar items) and meals related to situations listed below is an allowable expense, provided there is sufficient budget, and the public purpose can be documented:

- Costs of meals for Commissioners and/or staff at official and business-related meetings held during a mealtime hour that are not a regular part of PCHA operations.
- Cost of coffee and other refreshments at training sessions and staff meetings lasting four hours or longer.
- Cost of refreshments at appropriate ceremonies that are open to entity-wide attendance and the general public such as facility openings, swearing-in ceremonies, commendations, service awards, etc.
- Cost of meals provided to PCHA employees during emergency situations (e.g., major fire, water main break, and natural disasters).
- Cost of working lunches at PCHA facilities which include the attendance of citizen committee members, partner government /nonprofit staff, clients served, government officials and similar personnel.

- Facility rentals, as long as the expense is (1) reasonable, (2) justified, (3) meets the needs presented by the gathering in question and (4) meets needs that cannot be met by existing PCHA facilities/freely available facilities.

## REASONABILITY

All refreshment- or meal-related expenditures must meet a basic standard of cost-benefit reasonability. A meal or refreshment can be unreasonably lavish or unreasonably paltry, depending on the situation. The following questions can be used to determine reasonability:

- Does the cost of the meal/refreshment provided fall within an acceptable range for similar products?
- Is having a meal/refreshment integral to the success of this event?
- Does the meal/refreshment provided constitute what could be considered a luxury by the general public?
- Would knowledge of the use of funds for this expense cause a reasonable citizen concern or distrust?

If the event is open to the general public and is reliably forecast to be attended mostly by the public, then refreshments or meals should be purchased commensurate with the significance, timing, and attendance of the event, with respect to the public's funds and in keeping with the provisions outlined by the WSAG opinion listed above.

## NON-ALLOWABLE EXPENSES

- Cost of meals and/or refreshments at the department level for employee recognition such as retirements, birthdays, or "going-away" events
- Meals for department level meetings shorter than 4 hours, when there is no public attending
- Frequent or recurring meetings that can be considered a regular part of PCHA operations
- Any expense deemed unreasonable

Appropriate alternatives for unallowable events include potluck meals or refreshments funded by contributions from staff.

This policy does not, nor is it intended to, address purchases of meals while in Travel Status. Please see the Travel Policy for such guidelines on travel expenditures.

## PROCEDURE

When a department makes a refreshment or meal purchase, they must submit the Refreshments and Meals Justification Form, shown below, as back up with their invoice and submit it to Accounts Payable. This form is required for all payment methods including, credit card, and requisition/purchase order transaction.



## PIERCE COUNTY HOUSING AUTHORITY

603 South Polk Street, Tacoma, WA 98444 | 253-620-5400

### MEAL & REFRESHMENT JUSTIFICATION FORM

Effective Wednesday, September 28<sup>h</sup>, 2022

Event Name: \_\_\_\_\_

Event Date: \_\_\_\_\_

Organizer: \_\_\_\_\_

Phone # : \_\_\_\_\_

#### TYPE OF ACTIVITY

☐ Conference

☐ Training

☐ Council, Board, or Commission Meeting

☐ Meeting

☐ Public Event

☐ Other: \_\_\_\_\_

#### EXPENSE TO BE JUSTIFIED

☐ Light Refreshments

☐ Full Meal

☐ Facility Rental

#### DURATION

☐ Mealtime Hour

☐ 4+ Hours

☐ N/A for This Event

#### PUBLIC PURPOSE OR POLICY OBJECTIVE SERVED:

#### ATTENDEES (Attach if necessary)

Organizer Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Supervisor Signature: \_\_\_\_\_

Date: \_\_\_\_\_



# **PIERCE COUNTY HOUSING AUTHORITY**

603 South Polk Street, Tacoma, WA 98444 | 253-620-5400

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## **STRATEGIC FOCUS**

## PROPOSED BOARD AGENDA & SCHEDULE FOR 2023

### PURPOSE:

The format of the meetings of the Pierce County Housing Authority Board of Commissioners has gone largely without alteration for almost 30 years. In order to recenter Board Meetings on legitimate strategic concerns, the following alterations to our standing Board Meeting Agenda has been devised.

### STANDING REPORTS

- Written Board Reports
  - Each Director will provide a written update of their department's progress over the past month, as before. Directors will no longer be expected to deliver their written reports orally.
- Financial Committee Update
  - Due to the importance of monitoring the Agency's finances, the financial report will continue to be offered both in a written format and orally, however due to the consistent and lengthy nature of this report, its oral portion will be limited to the discretion of the Board's Finance Committee. The oral report will be the sole responsibility of the Finance Committee, and they will provide any necessary update on information provided in the report and in their meetings with the CFO for the broader Board. All usual information will be provided in its standard written form.
- Executive Report & Division Updates
  - The Executive Director will give a brief oral report on areas of note over the past month, or areas in which Board consultation is required. Items of emergency status or of pressing importance may fall under this report orally as well as the appropriate department in written form.
  - Board Members will be given a direct period to field inquiries about the contents of the Directors' written reports.

### STRATEGIC FOCUS

For each calendar month, the Board will have a scheduled strategic focus. The appropriate Directors for the topic will prepare a report on the topic at hand, which will then be reviewed by the Commissioners. There will be a following period during which the Commissioners may discuss necessary strategy and policy concerns raised by the Directors, establish the basis for resolutions to be presented at the following meetings, or debate the resolutions, recommendations, strategic questions, and policy updates that have been brought by the Directors to the Board.

The Strategic Focus also prioritizes the setting, tracking, and accomplishing of goals throughout the year. This is accomplished through three months of designated goal tracking and setting (Goal Setting in December, Goal Tracking in June, and Goal Review in November), and two months of designated updates on the local context and industry context in which our progress must be considered (Local Housing Authority YTD's in July and Local Context in October).

The full schedule of strategic topics can be found on the following page.

MONTH	STRATEGIC ISSUE	DETAILS
Annual	Officer Appointment & Welcome	<ul style="list-style-type: none"> <li>Welcome new Commissioners to Pierce County Housing Authority</li> <li>Appoint officers and form committees as needed</li> </ul>
January	Staff Priorities	<ul style="list-style-type: none"> <li>Introduction of new and existing PCHA Staff</li> <li>Discussions of staffing priorities over the coming year</li> </ul>
February	Review of PCHA Housing Programs	<ul style="list-style-type: none"> <li>In-depth review of current programs and statistics</li> <li>Discussion of priorities and strategies to maximize program effectiveness</li> </ul>
March	Partnerships	<ul style="list-style-type: none"> <li>Describe current partnerships and coming partnerships</li> <li>List partnership successes and challenges</li> <li>Discuss strategies and priorities with making and maintaining community partnerships</li> </ul>
April	Long Term Project Review	<ul style="list-style-type: none"> <li>Review and discuss total progress of Long-Term Projects (Section 18 Disposition, 108<sup>th</sup> St. Remodel, etc.) against projected timelines and budgets</li> </ul>
May	Mid-Year Goal and Strategy Review	<ul style="list-style-type: none"> <li>Analyze progress towards One-Year goals and Five-Year Goals</li> <li>Analyze Budget versus YTD actuals</li> <li>Consider amendments to goals based on YTD evidence</li> </ul>
June	Housing Authority YTD & Public Outreach	<ul style="list-style-type: none"> <li>Share our position from June Meeting with local and national partners and review their work towards their own goals over the last year</li> <li>Discuss opportunities and challenges for public outreach over the next year and where we might attempt to create public engagement in our works</li> </ul>
July	Maintenance Priorities	<ul style="list-style-type: none"> <li>Discuss the challenges and successes of the Maintenance Department over the last year</li> <li>Analyze upcoming/foreseen projects and set priorities on nonessential repairs for coming year if budget allows</li> </ul>
August	Policy Review	<ul style="list-style-type: none"> <li>Review all standing PCHA policies and discuss revisions and updates based on year-long implementation</li> <li>Review the Commissioner Handbook and discuss necessary revisions and updates</li> </ul>
September	Statistics and Contextualization	<ul style="list-style-type: none"> <li>Create a statistical backdrop from each department's area of focus to enhance the ability of Board Members to properly review and assess the past year and make plans and strategies for the coming year</li> <li>Discussion of Affordable Housing news and happenings over the previous year both inside and outside the Authority</li> </ul>
October	Year in Review	<ul style="list-style-type: none"> <li>Review progress towards One-Year Goals and Five-Year Goals</li> <li>Account for successes and challenges faced by the Authority</li> <li>Discussion of lessons learned and how future goals can be reasonably set and attained</li> </ul>
November/December	New Year Preparation	<ul style="list-style-type: none"> <li>Review and approve agency budget for next Fiscal Year</li> <li>Approve next year's Board Schedule</li> <li>Create and approve next year's goals and strategic priorities</li> </ul>



## SAMPLE AGENDA



### **PIERCE COUNTY HOUSING AUTHORITY**

603 South Polk Street, Tacoma, WA 98444 | 253-620-5400

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#### **SAMPLE AGENDA FOR THE REGULAR MEETING OF THE BOARD OF COMMISSIONERS**

Last Wednesday, Any Month, 2022

Location: Online Via Zoom

Time: 3:30 PM

1. ROLL CALL
2. PUBLIC COMMENT – Five (5) Minutes Per Speaker
3. OLD BUSINESS
  - a. Consider a Motion Approving the Minutes for the Previous Board Meeting
  - b. Consider a Motion Approving the Cash Disbursements for the Previous Month
4. NEW BUSINESS
  - a. Introductions as needed
  - b. RESOLUTIONS as needed
5. STRATEGIC FOCUS: MONTHLY TOPIC
  - a. Overview of Monthly Topic Presented by the Appropriate Director/Member of Staff
  - b. Review of Areas of Improvement & Concern Within Strategic Focus
  - c. Review or Drafting of Resolutions (If Applicable)
  - d. Commissioner Discussion on Proposals, Goals, Strategies, etc.
6. FINANCIAL UPDATE– Board Finance Committee
7. EXECUTIVE REPORT & DIVISION UPDATES
8. COMMISSIONER’S CORNER
9. EXECUTIVE SESSION IF NEEDED
10. ADJOURNMENT



# **PIERCE COUNTY HOUSING AUTHORITY**

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## **EXECUTIVE REPORT & DIVISION UPDATES**

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### PCHSC PRESENTATION

- On 9/20, we presented our current operations to the Pierce County Human Services Committee alongside Tacoma Housing Authority and SHA3P.

### MERGER CONSULTATION

- Pending approval from their Board, Tacoma Housing Authority is considering sharing the cost of a financial consultant to determine the costs and benefits of a merger between THA and PCHA.

### PARTIES INTERESTED IN PCHA DISPOSITION

- Made contact with three organizations that have an interest in PCHA Disposition properties:
  - Kathleen Hosfield, Executive Director of Homestead Community Land Trust
  - Kurt Creager, Executive Vice President of Bridge Housing Corporation
  - Kevin Kellogg, Pacific NW Market President, Gorman & Co.

## PIERCE COUNTY HOUSING AUTHORITY

A County-Sponsored Enterprise

Brief Report for the 2022 Pierce County Human Services Committee



www.pchawa.org  
pch@pchawa.org  
253-620-9400 Mail | 253-620-9455 Fax  
603 South Polk Street Tacoma, WA 98444

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## Our Mission – Serving the People

Pierce County Housing Authority strives to provide safe, decent, affordable housing and economic opportunity, free from discrimination.

2

## Our Board of Commissioners





**Mark Worthington, Chair**  
Chair of Pierce County Council, Pierce County Executive, and Chair of the Pierce County Council. He has served on the Pierce County Council since 2011 and is currently serving as the Chair of the Pierce County Council.



**Willie Stewart, Commissioner**  
Willie Stewart is a community leader and a former member of the Pierce County Council. He has served on the Pierce County Council since 2011 and is currently serving as the Chair of the Pierce County Council.



**Dorinda Stubbins, Commissioner**  
Dorinda Stubbins is a community leader and a former member of the Pierce County Council. She has served on the Pierce County Council since 2011 and is currently serving as the Chair of the Pierce County Council.



**Nancy Miller, Commissioner**  
Nancy Miller is a community leader and a former member of the Pierce County Council. She has served on the Pierce County Council since 2011 and is currently serving as the Chair of the Pierce County Council.




**Nancy Miller, Commissioner**  
Nancy Miller is a community leader and a former member of the Pierce County Council. She has served on the Pierce County Council since 2011 and is currently serving as the Chair of the Pierce County Council.

Board members are nominated by the County Executive and appointed by a vote of the Pierce County Council.

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## Organization Quick Facts



<b>\$30 MILLION</b> Distributed in annual Housing Assistance Payments in our Voucher programs	<b>124</b> Low Income Public Housing units owned and maintained by PCHA	<b>45</b> Members of staff	<b>670+</b> Apartment units rented at Fair Market Rates or below – significantly under area median rent & providing up to \$2.5 million in unofficial subsidies for Pierce County renters per year
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## Vouchers & Programs



<b>Veterans' Administration Supported Housing</b> 206 Issued Households Vouchers supporting at-risk veterans and support for our nation's Veterans' transition to housing.	<b>Emergency Housing Vouchers</b> 38 Issued Households Social support for those experiencing homelessness and other PCHA programs to assist with financial stability and other needs.	<b>Family Self-Sufficiency Program</b> 427 Participants Financial counseling, job training, and other support services to assist families in achieving self-sufficiency.	<b>Project-Based Vouchers</b> 230 Issued Vouchers provided to participants in the community who are at risk of homelessness or are currently experiencing homelessness.	<b>Non-Elderly Disabled Vouchers</b> 172 Issued Households Vouchers provided to non-elderly disabled veterans who are at risk of homelessness or are currently experiencing homelessness.	<b>8-Year Home-Ownership Program</b> 24 Current Participants A home ownership program for veterans who are at risk of homelessness or are currently experiencing homelessness.
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## Vouchers & Programs



<b>EMERGENCY HOUSING VOUCHERS</b> <b>WHAT ARE THEY?</b> Vouchers designed to meet the needs of the homeless. <b>HOW DO THEY WORK?</b> PCHA provides recipients with rental funding for meeting the needs of the homeless. Funding is provided for the first 90 days of the program. Funding is provided for the first 90 days of the program. Funding is provided for the first 90 days of the program. <b>WHAT'S THE TAKEAWAY?</b> PCHA is unique in that it provides a wide range of services to support the needs of the homeless. PCHA is unique in that it provides a wide range of services to support the needs of the homeless.	<b>PROJECT-BASED VOUCHERS</b> <b>WHAT ARE THEY?</b> Vouchers administered at specific units with community partners. <b>HOW DO THEY WORK?</b> These vouchers are tied to units, not to tenants, and they are provided to an organization that provides housing services. This is done for PCHA to partner with organizations that provide needed housing services. These vouchers are tied to units, not to tenants, and they are provided to an organization that provides housing services. <b>WHAT'S THE TAKEAWAY?</b> PCHA's drive development and can be used to create deep affordability, create tax credits, and spur a competitive market for affordable housing. PCHA's drive development and can be used to create deep affordability, create tax credits, and spur a competitive market for affordable housing.
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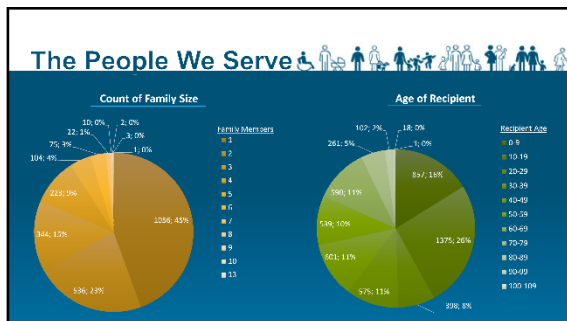
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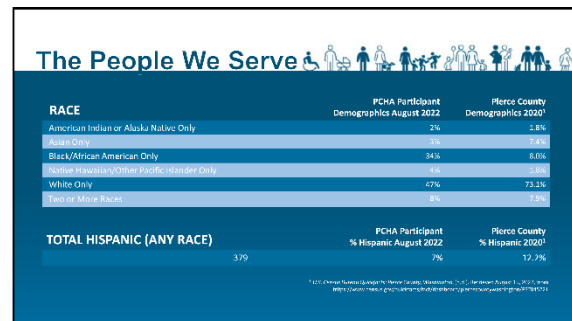
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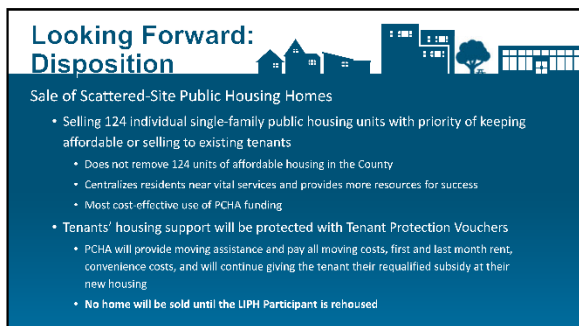
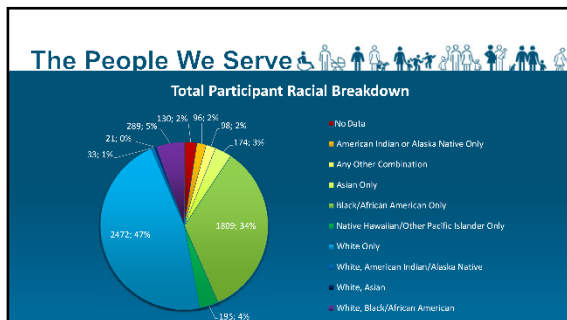
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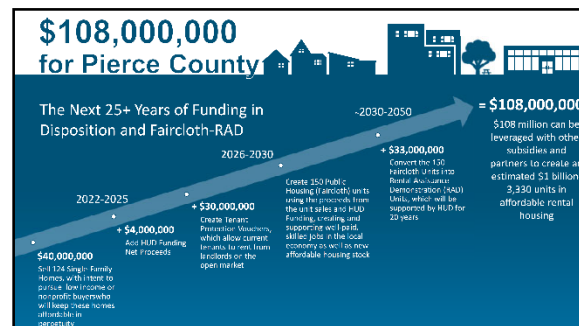
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A PROPOSAL FOR CONSULTING SERVICES FOR:

# PIERCE COUNTY HOUSING AUTHORITY

July 8, 2022



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# Letter of Interest







Tel: 215-564-1900  
Fax: 215-564-3940  
[www.bdophafinance.com](http://www.bdophafinance.com)

1801 Market Street  
Suite 1700  
Philadelphia, PA 19103

July 11, 2022

Pierce County Housing Authority  
Attn: Jim Stretz, Executive Director  
603 South Polk Street  
Tacoma, WA 98444

Dear Mr. Stretz,

Thank you, for giving BDO PHA Finance the opportunity to present our qualifications to provide consulting services to the Pierce County Housing Authority. You can be assured that your services will have involvement of partners and professionals who have hands-on experience in delivering services to organizations of similar size and complexity to the Pierce County Housing Authority.

Established in 1910, BDO is a national professional services firm providing assurance, tax, financial advisory, and consulting services to a wide array of businesses. As BDO's public housing-only affiliated, BDO PHA Finance is able to focus exclusively on our public housing clients. Through this proposal, we will demonstrate our commitment to your success through our key value propositions:

- ▶ **Demonstrated Significant Experience and Commitment to Serving the Affordable and Public Housing industry.** Our staff features a combined 100 plus years of experience and have a national commitment to serving the Public Housing industry.
- ▶ **Industry Education and Thought Leadership.** BDO professionals are recognized as key thought leaders within the Affordable Housing industry. From proprietary research and industry events, BDO is at the forefront of the housing industry conversation, publishing a variety of knowledge resources.
- ▶ **Commitment to Perform the Work in a Timely Manner.** BDO's approach to client service rests on the principle that successful professional relationships are built on close communication. We encourage regular meetings to ensure that we contribute meaningful ideas, strategies, and plans to address your challenges. We commit to maintaining a consistent level of communication with the Pierce County Housing Authority and pledge to meet all of your deadlines.
- ▶ **Value for Fees.** We understand the importance of efficiencies and cost control and have specifically designed our methodology to provide our engagement teams with the tools they need to provide high quality services in a cost-effective manner.

We value the opportunity to work with the Pierce County Housing Authority and BDO USA, LLP ("BDO") looks forward to agreeing on mutually acceptable terms that combine the needs of the Pierce County Housing Authority and BDO upon contract award. We are confident that we can enter into contractual negotiations to reach mutually agreeable terms upon contract award.

If you have any questions regarding our proposal, please feel free to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Casterline", written over a horizontal line.

BDO USA, LLP  
Jason Casterline, CPA  
Managing Director  
484-390-4798  
[jcasterline@bdo.com](mailto:jcasterline@bdo.com)



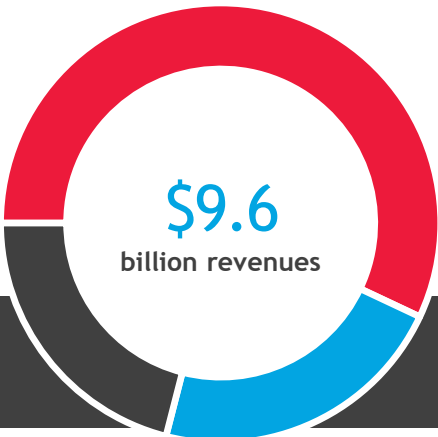
# Firm qualifications



# The BDO Network

WHERE YOU NEED US, WHEN YOU NEED US

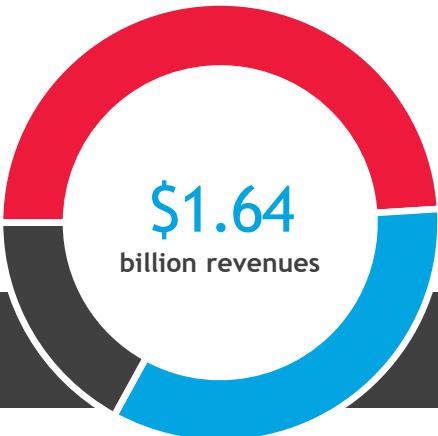
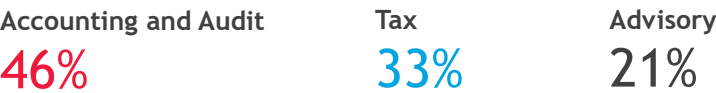
## ABOUT BDO INTERNATIONALLY



Year on year **10.1%** growth rate at *constant* exchange rates



## ABOUT BDO NATIONALLY



**11.8%** increase over last year



# About BDO PHA Finance

. Consultants. CPAs.



Our focus and experience is demonstrated both in our relevant client work and our thought leadership.

From timely reports to industry events, BDO PHA Finance is at the forefront of the public and affordable housing conversation, offering a variety of knowledge resources including the following:

- ▶ **PHA Alerts**, timely electronic articles on recent news affecting PHAs, including recent HUD updates.
- ▶ **News to Use**, urgent news-bites covering the latest accounting and compliance changes.
- ▶ **Hot topic webinars**, web-based training options that address industry hot topics while

# Listing of services

The **BDO PHA FINANCE ADVANTAGE** was created to provide housing authorities with services to assist with HUD compliance issues, efficiencies of operations, maximization of subsidy and preparation for future planning opportunities. The BDO PHA FINANCE ADVANTAGE also offers individual services for specific issues to which your agency may be exposed.

While a few of the below products may be congruent to the specific requests of this proposal, this listing is not intended to serve as our approach to the scope of services. The following is a full offering of available services per the RFP's request.

## The Finance Department Assessment Advantage

BDO PHA Finance consultants can investigate and address some of your issues before they become problems. We will review your housing authority's finance department for: compliance with HUD regulations, compliance with GAAP & GASB regulations, implementation of Project Based Accounting, maximization of subsidy, organizational structure, internal control and accounting functions, competency of accounting staff, the budget process and reporting. We will provide a report of observations and recommendations to correct any deficiencies.

## The Fee Accounting Advantage

The Fee Accounting Advantage is an alternate solution for processing monthly accounting information. We will assist with the maintenance of a general ledger for all monthly accounting activity and provide monthly financial statements in a format that the Board requires. Additionally, we will complete all budgeting and Year-end reporting to HUD/REAC and provide audit support. On a monthly basis, our consulting team will:

- ▶ Prepare monthly bank reconciliations
- ▶ Prepare monthly adjusting journal entries
- ▶ Record receipts and disbursements
- ▶ Maintain a general ledger of all authority activity
- ▶ Prepare monthly financial reports custom tailored to your needs
- ▶ Prepare a monthly FDS along with the Financial Ratios
- ▶ Prepare a "simple" cash flow
- ▶ Prepare and submit the 52681-B form, "VMS"

On an annual basis our consulting team will:

- ▶ Prepare the Operating Budget and Operating Fund calculation
- ▶ Submit the unaudited FDS to REAC
- ▶ Prepare work-papers that are ready for your auditor
- ▶ Provide audit support during the annual audit

## The Year-end Close Advantage

The Year-End Close Advantage will assist the Authority in analyzing your general ledgers, and provide adjusting entries and closing journal entries. We will provide workpapers that will be ready for the annual audit. We will prepare the Financial Data Schedule (FDS) to obtain the optimum scores for FASS reporting (three financial ratios) and submit the FDS to REAC in the required time frame. Additionally, we will provide an analysis of Operating Reserves. The analysis of Operating Reserves will include the required separation of Section 8 Reserves for HAP assistance and administrative fee revenue.

## The Budget Advantage

The Budget Advantage will help the Authority develop projections of revenues and expenditures for your fiscal year or for a longer time frame. We will help maximize subsidy from all funding sources, including Operating Fund subsidy, Section 8 subsidy and grant funding, and determine a beneficial allocation of expenditures. Our allocation plan will be OMB A-87/(now the SuperCircular and "Project Based" compliant.

## The Asset Management Advantage

BDO will assess your housing authority's structure in the areas of accounting and reporting, information technology, software, personnel, asset management and funding maximization. We will determine an implementation plan and help create a culture to comply with HUD's regulation to maximize subsidy. Our consultants will train your staff and, most importantly, ensure your PHA is operating efficiently.

# Listing of services

## The Property Performance Advantage

We can assist your Authority in establishing a strong foundation of property management fundamentals. We will guide your management team in developing best practices to monitor and interpret monthly site financials and constructively analyze site performance. We will assist in refining short- and long-term portfolio goals and implementing strategies to maximize your housing authority's operational performance. Services include:

- ▶ PHAS assistance
- ▶ Organizational Assessments
- ▶ Property performance enhancement
- ▶ Development of management and operational reports
- ▶ Budget development
- ▶ Property management staff training
- ▶ Compliance with HUD Asset Management requirements
- ▶ Fee for Service / staff allocation assistance
- ▶ Corrective Action Plans for non-performing properties
- ▶ Long term asset management strategies and portfolio analysis
- ▶ Property management staff training

## The Affordable Housing Advantage

BDO is a recognized leader in services to Affordable Housing providers. BDO currently services more than 300 varying Affordable Housing clients. We believe this varied experience gives us a competitive advantage in helping you succeed by giving us an in-depth knowledge of the issues affecting you.

- ▶ 10 percent carryover allocations
- ▶ Cost certifications
- ▶ Tax filings, including IRS Forms 8609 & Schedules A
- ▶ Annual auditing services
- ▶ HUD Electronic REAC Submissions
- ▶ Preparation of Forms 990
- ▶ Filing of Data Collection forms with the Federal Clearing House
- ▶ Reviews, Compilations & Agreed Upon Procedures
- ▶ General accounting and business services
- ▶ Tax consultation and due diligence
- ▶ Financial forecasts for housing projects
- ▶ Calculations of investors projected rate of return

## The RAD Advantage

BDO PHA Finance has assisted clients with RAD based strategic planning and RAD conversions from as early as the pre-application stages all the way through receipt of post-award RAD subsidy monies. We have worked with assisting with tasks including:

- ▶ Forecasting fee revenue to the Central Office Cost Center after a full or partial RAD conversion
- ▶ Analyzing existing debt for re-leveraging options (including RAD deals impacts )
- ▶ Examining current Energy Performance Contracting debt impacts on RAD projects
- ▶ General ledger accounting assistance with technical implementation of approved RAD conversions
- ▶ RAD budget preparation and forecasting
- ▶ Analysis of first year through third year actual subsidy streams
- ▶ Cash management in year one of a RAD conversion
- ▶ Financial Data Schedule preparation best practices
- ▶ VMS reporting guidance for PBV conversions
- ▶ Post RAD staffing recommendations

# Affordable housing experience

BDO's Affordable Housing Division serves a variety of clients in your industry. We believe this varied experience gives us a competitive advantage in helping you succeed by giving us an in-depth knowledge of the issues affecting you. Some of the clients we serve include:

- ▶ Affordable Housing Property Managers
- ▶ Affordable Housing Developers
- ▶ Those who finance Affordable Housing projects
- ▶ Builders of Affordable Housing
- ▶ Owners of existing or older Affordable Housing
- ▶ LIHTC Investors
- ▶ Not-for-profits owners of Affordable Housing

## SERVICES INCLUDE:

- ▶ 10 percent carryover allocations
- ▶ Cost certifications
- ▶ Tax filings, including IRS Forms 8609 & Schedules A
- ▶ Annual auditing services
- ▶ HUD Electronic REAC Submissions
- ▶ Preparation of Forms 990
- ▶ Filing of Data Collection forms with the Federal Clearing House
- ▶ Reviews, Compilations & Agreed Upon Procedures
- ▶ General accounting and business services
- ▶ Tax consultation and due diligence
- ▶ Financial forecasts for housing projects
- ▶ Calculations of investors projected rate of return

STATE	NUMBER OF PROPERTIES	NUMBER OF UNITS
Alabama	3	258
California	9	586
Delaware	2	239
Florida	10	1,646
Hawaii	1	555
Illinois	11	1,402
Indiana	6	456
Kansas	1	136
Kentucky	1	46
Louisiana	7	931
Maryland	3	426
Mississippi	29	2,479
Missouri	5	439
New Hampshire	1	153
New Jersey	29	3,355
New York	4	609
Oklahoma	17	1,543
Pennsylvania	89	7,241
Philadelphia	57	3,691
Other	32	3,550
South Carolina	3	335
Texas	5	906
U.S. Virgin Islands	3	433
Virginia	2	339
West Virginia	4	429
Washington, DC	1	152
<b>Total</b>	<b>246</b>	<b>25,094*</b>

\* Approximately one-half have tax credits

# Experience to meet your needs



## BDO PHA Finance has served over 400 public housing and affordable housing projects

For the budget to serve as a useful point of reference during the year, we will work with you to determine the extent to which the accounting system, as currently configured, will support the required reporting of budget to actual results. We can offer recommendations about how to leverage the existing system, any limitations we see for that system, and information about other system options that may be available. We understand that it is your plan to have the existing accounting personnel retain responsibility for the accounting and financial reporting process so we would offer this as consultative support unless you request our further assistance.

Our team members possess a variety of skills and experience. Our affordable housing clients include multi-family nonprofits, multi-family for-profits, management companies, developers, affordable housing funds, qualified historic rehabilitation projects and low-income housing tax credit limited partnerships.

We have conducted numerous trainings for hundreds of public housing authority professionals, including:

- ▶ National Association of Housing and Redevelopment Officials (NAHRO)
- ▶ Public Housing Authorities Directors' Association (PHADA)
- ▶ Southern California Finance Officers Group
- ▶ New York State Public Housing Authority Directors Association (NYSPHADA)
- ▶ New Jersey chapter of NAHRO (NJNAHRO)
- ▶ Indiana chapter of NAHRO (IN NAHRO)
- ▶ Mid-Atlantic Regional chapter of NAHRO (MARC-NAHRO)
- ▶ Virginia Association of Housing Development Community Officers (VAHDCO)
- ▶ Kentucky Housing Association (KHA)
- ▶ Florida Association of Housing and Redevelopment Officials (FAHRO)
- ▶ Texas Housing Association (THA)
- ▶ Illinois Association of Housing Authorities (IAHA)
- ▶ Tennessee Association of Housing and Redevelopment Authorities (TAHRA)





# Experience



# Current Client list



# Current clients

Below is a partial list of our current public and affordable housing clients:

- ▶ Akron Metropolitan Housing Authority, Accounting & Consulting
- ▶ Asheboro Housing Authority, Accounting & Consulting
- ▶ Allentown Housing Authority, Accounting & Consulting
- ▶ Allegheny County Housing Authority, Accounting & Consulting
- ▶ Baytown Housing Authority, Accounting & Consulting
- ▶ Beeville Housing Authority, Fee Accounting
- ▶ Belmont Metropolitan Housing Authority, Accounting & Consulting
- ▶ Benicia Housing Authority, Accounting & Consulting
- ▶ Binghamton Housing Authority, Accounting & Consulting
- ▶ Bristol Housing Authority, Accounting & Consulting
- ▶ Brunswick Housing Authority, Accounting & Consulting
- ▶ CVR Associates, Inc.
- ▶ Carolinas Council of Housing and Redevelopment Officials, Training
- ▶ Charlottesville Redevelopment & Housing, Accounting & Consulting
- ▶ Cincinnati Metropolitan Housing Authority, GL Assistance
- ▶ City of Long Beach Housing Authority, CA Accounting
- ▶ Columbus Metropolitan Housing Authority, OH Accounting & Consulting
- ▶ Covington Housing Authority, LA Fee Accounting
- ▶ Crossville Housing Authority, Accounting & Consulting
- ▶ Cumberland Plateau Regional Housing Authority, Accounting & Consulting
- ▶ Cuyahoga Metropolitan Housing Authority, Accounting & Consulting
- ▶ El Paso County Housing Authority, Accounting & Consulting
- ▶ Elk County Housing Authority, Accounting Services
- ▶ Evansville Housing Authority, RAD consulting
- ▶ Fairfax Housing & Redevelopment, Accounting & Consulting
- ▶ Fayette County Housing Authority, Accounting & Consulting
- ▶ Fort Wayne Housing Authority, Accounting & Consulting
- ▶ Fort Pierce Housing Authority, Accounting & Consulting
- ▶ Geneva Housing Authority, Training
- ▶ Greensboro Housing Authority, NC Accounting & Consulting
- ▶ Harrisburg Housing Authority, Accounting & Consulting
- ▶ Hagerstown Housing Authority, Consulting
- ▶ HA of Prince George's County, Consulting
- ▶ HA of the County of Santa Barbara, Accounting and Consulting
- ▶ HA of the County of Santa Cruz, Accounting & Consulting
- ▶ HA of the County of San Joaquin, Accounting & Consulting
- ▶ Havre De Grace Housing Authority, Accounting and Consulting
- ▶ Housing Finance Professionals of Alabama, Training
- ▶ Housing Authority of Kansas City (MO), Accounting & Consulting
- ▶ Housing Authority of New Orleans, Accounting & Consulting
- ▶ Housing Authority of the City of Austin, Accounting & Consulting
- ▶ Housing Authority of the City of Canton, Accounting & Consulting
- ▶ Housing Authority of the City of Danbury, Accounting & Consulting
- ▶ Housing Authority of Houma, Fee Accounting
- ▶ Housing Authority of the City of LA, Accounting & Consulting
- ▶ Housing Authority of the County of LA, Accounting & Consulting
- ▶ HA of the City of Richmond (IN), Accounting & Consulting
- ▶ HA of the City of Yazoo City, Accounting & Consulting
- ▶ Indianapolis Housing Authority, RAD training
- ▶ Illinois Association of Housing Authorities, Training
- ▶ Jackson Housing Authority (MS), Accounting & Consulting
- ▶ Kittitas Housing Authority, Accounting & Consulting
- ▶ Kentucky Housing Association, Speaking Engagement
- ▶ Kingsville Housing Authority, Accounting & Consulting
- ▶ Lehigh County Housing Authority, Accounting & Consulting
- ▶ Lansing Housing Commission, Accounting & Consulting
- ▶ Lucas Metro. Housing Authority, Accounting & Consulting
- ▶ North Little Rock Housing Authority, Accounting & Consulting
- ▶ Ohio Housing Authorities, Training
- ▶ Pickaway Housing Authority, Accounting & Consulting
- ▶ Pleasantville Housing Authority, Accounting & Consulting
- ▶ Ponchatoula Housing Authority, Fee Accounting

# Current clients cont'd

Below is a list of our current public and affordable housing clients:

- ▶ Reading Housing Authority, Accounting & Consulting
- ▶ Richmond Housing Authority (CA), Accounting & Consulting
- ▶ Ripley Housing Authority, Accounting & Consulting
- ▶ Rockville Housing Enterprises, Accounting & Consulting
- ▶ Rocky Mount Housing Authority, Accounting & Consulting
- ▶ Rutgers, State University of NJ, Center for Government Services (PHADA), Training
- ▶ Sacramento Housing & Redevelopment Authority, Accounting & Consulting
- ▶ San Buenaventura Housing Authority, Accounting & Consulting
- ▶ San Francisco Housing Authority, Accounting & Consulting
- ▶ South Carolina Regional HA #3, Accounting & Consulting
- ▶ South Gate Housing Authority, Accounting & Consulting
- ▶ Springfield Housing Authority, MA Accounting & Consulting
- ▶ Stark Metropolitan Housing Authority, Accounting & Consulting
- ▶ St. John Parish Housing Authority, Fee Accounting
- ▶ St. James Parish Housing Authority, Fee Accounting
- ▶ Stratford Housing Authority, Accounting & Consulting
- ▶ Tennessee Association of Redevelop & Housing Authorities, Training
- ▶ Terre Haute Housing Authority, Accounting & Consulting
- ▶ Texas Housing Association, Training
- ▶ Topeka Housing Authority, Accounting & Consulting
- ▶ Trenton Housing Authority, Accounting & Consulting
- ▶ Virginia Association of Housing & Community, Training
- ▶ Warren Metropolitan Housing Authority, Accounting & Consulting
- ▶ West Virginia Association of Housing Authority, Training
- ▶ Williamsburg Redevelopment & Housing Authority, Accounting & Consulting
- ▶ Wilmington Housing Authority, DE Accounting & Consulting
- ▶ Yonkers Housing Authority, Accounting & Consulting
- ▶ Ypsilanti Housing Commission, Accounting & Consulting



# Scope of Services





## Scope of Services

BDO stands ready to provide the following services, if hired by the housing authority:

Prepare a Financial Analysis of a merger between the Tacoma Housing Authority and the Pierce County Housing Authority. Work would include the following:

- ▶ Identification of potential cost savings from merger
- ▶ Identification of additional incremental costs from merger (one time and ongoing)
- ▶ Financial advantages and disadvantages to each party: PCHA and THA
- ▶ Alternatives to merger/consolidation: e.g. management contract for various functions
- ▶ Other financial matters to consider





## Resumes & professional credentials



# BDO Leaders



**BRIAN D. ALTEN, CPA**  
Partner

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## EXPERIENCE

Prior to combining with BDO and establishing BDO PHA Finance in 2012, Brian was a Director at Asher and Company, LTD. Before joining Asher in 2005, Brian was a partner with PHA Finance, Inc. and co-creator of “The PHA Finance Solution.” Brian brings over twenty years of experience in areas of accounting and financial consulting for Public Housing Authorities (PHAs) across the nation.

Mr. Alten’s areas of proficiency include: the Low Income Public Housing Program, the Housing Choice Voucher Program, as well as the project-based Section 8 Moderate Rehabilitation and New Construction Programs, the Capital Fund grant, HOPE VI, ROSS, Community Development Block Grants, and various other programs and grants and Rural Development.

Brian has provided tax credit financial consulting to his clients, as well as mixed finance development guidance and CFFP infrastructure instruction. Brian has helped PHAs maximize both subsidy and PHAS scores. Mr. Alten has been selected to assist agencies that were under a MOA or designated as troubled, and he has successfully graduated them of troubled status. He has also developed policies and procedures to improve the fiscal position of several PHAs. Brian has consulted with numerous authorities for the implementation of Project Based Accounting & Management, budget development and operating subsidy. He worked with multiple stop loss agencies, and was instrumental in assisting his clients comply with asset management.

Brian is a featured national seminar speaker on issues such as HUD, GAAP, GASB and Project Based Accounting and Reporting. Brian is also a contributing columnist and co-editor of a leading housing industry periodical.

## PROFESSIONAL AFFILIATIONS

American Institute of Certified Public Accountants (AICPA)  
Association of Certified Fraud Examiners (ACFE)  
National Association of Housing and Redevelopment Organizations (NAHRO)  
Pennsylvania Institute of Certified Public Accountants (PICPA)

## EDUCATION

B.A., Economics, Pennsylvania State University

Philadelphia University (formerly Philadelphia College of Textiles & Science), Post Bachelor Certificate in Accounting  
Certified Public Accountant (certified in Pennsylvania)



# BDO Leaders



**NICK AURIEMMA, CPA, CFE**  
Partner

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## EXPERIENCE

Prior to working with BDO, Nick was the principal manager in an Audit firm focusing in on Public Housing Authorities and Affordable Housing entities. In his more than thirteen years of experience, Nick has managed engagements for governmental, non-profit and for-profit audits encompassing financial reporting, internal control over financial reporting, compliance with federal awards, and internal control over compliance with federal awards.

Nick graduated from Pennsylvania State University in 2002 with highest honors, successfully passed the Uniform CPA exam in 2003, and is a registered CPA in the state of New Jersey. Nick will be responsible for supervising fieldwork at the PHA's offices and preparation of the final reports.

## PROFESSIONAL AFFILIATIONS

National Association of Housing and Redevelopment Organizations (NAHRO)

## EDUCATION

B.S., Accounting, Pennsylvania State University  
Certified Public Accountant (certified in New Jersey)  
Certified Fraud Examiner (national certification)

# BDO Leaders



**JASON CASTERLINE, CPA**  
Managing Director

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## EXPERIENCE

Prior to joining BDO, Jason founded Casterline Associates P.C. With more than 30 years of experience, Jason's background includes assisting housing authorities on financial management issues. He has provided consultation services to more than 150 Public Housing Agencies (PHAs) since 1985, including providing financial management advice to the majority of the ten largest PHAs.

Additional services that Jason has provided to his clients include: accounting services, audits, PHA operations assessments, policies and procedures development, and a variety of technical assistance to the subsidized housing industry. Additionally, Jason has trained over 7,000 PHA and HUD staff in PHA Financial Management, Asset Management and Project Based Accounting, and GAAP conversion. He has written numerous articles on the betterment of PHA financial management processes and presented before the National Association of Housing and Redevelopment Officials (NAHRO), the Public Housing Authority Directors Association (PHADA), and numerous regional and state housing associations.

Jason is an honors graduate with a B.S. in Accounting from West Chester University, a Certified Public Accountant, and is a member of the American Institute of CPAs and Pennsylvania Institute of CPAs.

## PROFESSIONAL AFFILIATIONS

American Institute of Certified Public Accountants  
Pennsylvania Institute of Certified Public Accountants

## EDUCATION

B.S., West Chester University

# BDO Directors



## THUC-NHI DINH

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## CHRISTINA FALCONE, CPA

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### EXPERIENCE

Thuc-Nhi is a Director for BDO PHA Finance and joined the firm in 2012. She devotes her time to providing Public Housing Authorities with accounting and consulting services. She is responsible for financial reporting and accounting functions which involves oversight, recording, and monitoring of multiple housing authority projects and programs. Thuc-Nhi is also responsible for daily accounting duties including but not limited to month end, year-end, budgets and FDS data.

Prior to joining the BDO PHA Finance team, Thuc-Nhi worked as a Senior Audit Associate for Reznick Group, a public accounting firm specializing in Low-income Housing Audits, in Bethesda, MD. She also worked as a Senior Audit Associate for Grant Thornton, specializing in the Financial Services field of the Audit department, in the Philadelphia office. Thuc-Nhi lead various engagements and applied her knowledge and skills in order to meet audit deadlines.

### EDUCATION

B.S., Accounting, Pennsylvania State University

### EXPERIENCE

Christina's experience prior to joining BDO includes consulting for PHA and Section 8 financial clients, as well as being the Chief Financial Officer for a construction firm. She has a deep background in working with accounting clients and providing ongoing accounting services and technical support to all sizes of PHAs. Additionally, she has extensive knowledge of the Housing Choice Voucher program financial reporting requirements and experience in general ledger financial analysis and financial reporting to the Real Estate Assessment Center in accordance with Generally Accepted Accounting Principles. She also assists PHAs in converting to Project Based Budgeting and Accounting and has developed a Capital Fund Program that tracks and reconciles for a large PHA.

She has been published in a major housing journal regarding enhancing financial management of the Modernization program. She was intimately involved in the development of a Cost Allocation Plan for one of the five largest PHAs in the United States.

Christina is a Certified Public Accountant and a *cum laude* graduate from West Chester University with a Bachelor of Science in Accounting.

### EDUCATION

B.S., West Chester University

**DWAYNE TUCKER, CPA****Director**

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**EXPERIENCE**

Dwayne has extensive experience in providing Accounting, Audit, Training, and Consulting Services to a variety of PHAs. He has also been involved in Asset Management and Project Based conversions for large stop loss Housing Authorities, and was engaged in fiscal year end closings and assisting PHAs that have lost their Finance Director. Additionally, he has been involved with PHA outsourcing assignments and served as the Assistant Finance Director on an outsource basis for a large New Jersey PHA for a five year period.

Prior to joining BDO, Dwayne was a financial analyst with a large lending institution. Dwayne is a Certified Public Accountant and has a Bachelor's of Science degree in Accounting from Millersville University.

**EDUCATION**

B.S., Millersville University



### **KELLI ADAMS, CPA**

#### **Senior Manager**

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### **JAKE BASTONI, CPA**

#### **Senior Manager**

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## **EXPERIENCE**

Kelli is Senior Manager for BDO PHA Finance and joined the firm in 2014. She provides a variety of accounting and consulting services in addition to assistance with year-end and monthly reconciliations for Public Housing Authorities.

Prior to joining the team, Kelli worked as a Senior Consultant for 11<sup>th</sup> Hour Service, a government contractor working on an Audit Readiness engagement for the Department of Defense. Prior to consulting, she worked as a Senior Audit Associate for Novak Francella, a CPA firm specializing in the audits of labor unions and related employee benefit plans.

She utilized her technical skills, communication and leadership abilities to conduct and lead various engagements.

## **PROFESSIONAL AFFILIATIONS**

American Institute of Certified Public Accountants  
Pennsylvania Institute of Certified Public Accountants

## **EDUCATION**

B.S., Accounting, Saint Joseph University

## **EXPERIENCE**

Jake is a Senior Manager with BDO PHA Finance and joined the firm in 2016. He utilizes his background in affordable housing and accounting to help the BDO PHA Finance team provide accounting and management consulting services for Public Housing Authorities nationwide.

Prior to joining the BDO PHA team, Jake worked as a Senior Accountant for Pennrose Management Company, a Philadelphia-based property management company that specializes in affordable housing. His duties included oversight of the accounting process for a portfolio of 25 properties, preparing monthly, quarterly, and annual financial statements, and providing training and support for staff level accountants.

Jake began his career as a Housing and Finance Associate at ACHIEVEability, a West Philadelphia based provider of affordable housing and social services for low income, single-parent families. During his time at ACHIEVEability, Jake gained valuable experience in affordable housing development, management, compliance, and accounting.

## **PROFESSIONAL AFFILIATIONS**

American Institute of Certified Public Accountants

## **EDUCATION**

B.S., Accounting, Saint Joseph's University



**MICHAEL BLAKELY, CPA**  
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**ALLISON CAVENAUGH**  
Manager

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## EXPERIENCE

Michael is a Manager for BDO PHA Finance and joined the firm in 2017. Michael has over thirteen years of experience in the affordable housing industry with a particular expertise in auditing public housing authorities and their affiliate entities. During that time, Michael also participated in audits of clients in the Low-Income Housing Tax Credit program as well as HUD multi-family housing programs.

Prior to joining BDO, Michael worked at Novogradac & Company LLP where he served as an Audit Manager. As an Audit Manager, Michael was responsible for planning and overseeing audit engagements that included financial reporting, internal control over financial reporting, compliance with federal awards, and internal control over compliance with federal awards.

## PROFESSIONAL AFFILIATIONS

Pennsylvania Institute of Certified Public Accountants

## EDUCATION

B.S., Accounting, DeSales University  
M.S., Accounting, Rider University

## EXPERIENCE

Allison's primary focuses is providing accounting and financial reporting services to a variety of clients and has assisted in the reconstruction of books and the turn-around of financially troubled PHAs. She has successfully closed books and submitted financial statements for a PHA that had not reconciled its general ledger accounts for a full year, as well as helped to maintain books and compile reports for well-managed Housing Agencies. She has also assisted in compiling budgets, developing funding calculations, and maximizing subsidies for clients. She has also assisted in Asset Management and Project Based conversions for large stop loss Housing Authorities and participated in a team to compile financial assessments for several Authorities participating in a Capital Fund leveraging bond issue.

## EDUCATION

B.S., Millersville University



**NICOLE HANNIGAN, CPA**  
Manager

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### EXPERIENCE

Nicole is a Manager with BDO PHA finance and joined the firm in 2012. She assists with monthly reconciliations, performs budget analyses and implementation, and offers support for year-end submissions.

Prior to joining the BDO PHA team, Nicole worked as an accounting clerk for W. Atlee Burpee, a horticultural company based in Warminster, PA. She handled bookkeeping duties as well as credit authorization and management for vendors.

### EDUCATION

B.S., Administration with a concentration in accounting, Temple University



**HANNAH MORAN, CPA**  
Manager

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### EXPERIENCE

Hannah is a Manager with BDO PHA Finance and joined the firm in 2010. She devotes her time to providing Public Housing Authorities with accounting and consulting services. Her focus is on monthly reconciliations including monthly submission of the VMS. Hannah assists in the Year End Close process for several clients and the preparation and submission of the FDS.

Prior to joining the PHA Finance team, Hannah worked as a Staff Accountant for Maco & Associates, LLC, a firm based in Collegeville, PA. She provided accounting and consulting services for small businesses and individuals. While obtaining her degree, Hannah continued to provide bookkeeping services for select clients remotely. Hannah has recently completed the CPA examination and is pursuing her license in the state of Pennsylvania.

### EDUCATION

B.S., Business Administration & B.S., Accounting, Salve Regina University



**CHE ALLEN**

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**JIE CHEN**

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**EXPERIENCE**

Che is a Senior Consultant with BDO PHA Finance and recently joined the firm in September 2019. She is responsible for aiding in day-to-day accounting and consulting.

Prior to joining, Che worked as a Senior Accountant for Mission First Housing Group, a small nonprofit affordable housing organization developing high quality community assets. Duties included management of general ledgers for over 300 properties, Year-end audit assistance, 990 tax returns and fixed asset capitalization.

Che started her career working as a staff accountant for many years creating and reviewing monthly financial reports for properties and managing different accounting systems.

**EDUCATION**

B.S., Accounting, Virginia Commonwealth University of Delaware  
M.S., Accounting, Liberty University

**EXPERIENCE**

Jie is a Senior Consultant with BDO PHA Finance and one of the newest members of our team and assists with monthly accounting and offers support for year-end submissions.

Prior to joining the BDO team Jie worked as a Senior Staff Accountant at the Jewish Federation of Greater Philadelphia where she performed the monthly reporting process and communicated with managers about actual budget variances. She prepared financial statements and IRS preparations for all entities. Prior to being a Senior Staff Accountant at the Federation, she worked as the staff accountant and performed general accounting reconciliation and supported data collection for annual budget preparations prepared monthly allocation reports to local and foreign agencies.

Prior to working at the Jewish Federation, she worked as an Accounting Specialist for two years for a Furniture & Lighting Company. Jie has over 8 years of experience.

**EDUCATION**

M.S., Accounting, Drexel University  
B.S., Financial Management Shanghai Lixin University of Accounting and Finance



**NICHOLE COLBY**

Senior Consultant

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**KAREN FRINO**

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**EXPERIENCE**

Nichole is a Senior Consultant with BDO PHA Finance and one of the newest members of our team and assists with monthly accounting and offers support for year-end submissions.

Prior to joining the BDO team Nichole worked as a Senior Accountant for Rettig Flyte Company, P.S., in Washington state that specializes in audit/attest engagements in the affordable housing industry. Duties included auditing experience of multifamily projects, performed HUD Uniform Guidance Single Audits in compliance with GAS, Data collection form reports for nonprofit organizations and performed tests on projects that applied for Washington State Housing Finance Commission's 9% LIHTC program.

►  
**EDUCATION**

B.A., Business Administration / Accounting  
University of Washington

**EXPERIENCE**

Karen is a consultant with BDO PHA Finance and joined us in July 2018. She is responsible for aiding in day-to-day accounting and consulting with our monthly and quarterly fee accounting clients. Karen started out with BDO in 2012 and currently still works for the Philadelphia BDO Tax Department. She takes care of payroll taxes for private and publicly held companies as well as payables and bookkeeping.

**JEFFREY HYNDMAN**

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**AARON HARRIS**

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**EXPERIENCE**

Jeffrey assists with monthly accounting, budgeting and offers support for year-end submissions.

Prior to joining the BDO team Jeffrey work as a Senior Accountant for Pennrose Management Company, a Philadelphia-based property management company that specializes in affordable housing. His duties included oversight of the accounting process for a portfolio of 25 properties, preparing monthly, quarterly, and annual financial statements. He performed annual budgeting/forecasting duties, prepared audit work papers/reviewed audit drafts and managed cash flow on a weekly basis. He was also responsible for providing training and support for staff level accountants and has worked with HUD and multiple housing authorities throughout the country.

**EDUCATION**

B.S., Accounting, Temple University

**EXPERIENCE**

Aaron is one of the newest members of our team and assists with monthly accounting, budgeting and offers support for year-end submissions.

Prior to joining the BDO team Aaron worked as a Senior Accountant for Pennrose Management Company, a Philadelphia-based property management company that specializes in affordable housing. His duties included oversight of the monthly and quarterly reporting in Yardi. Managed property management for multiple properties and entities and he assisted other staff accountants and property personnel with accounting related issues.

**EDUCATION**

B.S., Accounting, Eastern University  
M.S., Finance, Colorado State University, (currently enrolled online).

**TOM SICHONE**

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**MY TRAN**

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**EXPERIENCE**

Tom is a Senior Consultant with BDO PHA Finance and joined our team in July 2018. He is responsible for aiding in day-to-day accounting and consulting.

Prior to joining the BDO PHA team, Tom worked as a property accountant with Goldoller Real Estate Investments. He managed a portfolio of 9 residential properties generating financial reports, assisted with tax returns, budgeting and internal controls.

Tom started his accounting career in 2015 as a Staff Accountant at Pennrose Management Company, a Philadelphia based property management company that specializes in affordable housing. Here he worked with regional managers to create annual budgets and forecasts for 20 residential properties. Tom handled monthly financial statements, prepared audit work papers/reviewed audit drafts, and managed cash flow on a weekly basis. He's responsibilities also included working with PHFA and HUD.

**EDUCATION**

B.S., Accounting, Temple University

**EXPERIENCE**

My is a Senior Consultant with BDO PHA Finance; and recently joined our team. She has over 15 years experience as a staff accountant handling entire monthly accounting, Audit preparation, revenue cycles and prepared annual budgets.

Prior to joining the BDO PHA team, My worked as an Accounting Manager for an emergency center. She worked closely with managers to ensure efficient financial operations and worked closely with individual program managers to implement the work process. She performed the monthly accounting functions which included monthly financial statements, journal entries, bank reconciliations, budgeting and forecasting. My also worked as a Senior Accountant for a Health Management Corporation preparing corporate budgets of \$140 million dollars. She reconciled the monthly, quarterly and annual billing reports and analyzed and researched on variance budget vs. actual expenditures.

**EDUCATION**

MBA in Finance, California State University  
B.A. in Business Administration - Ho Chi Minh City  
University of Economics-Vietnam

**PAUL VASILEVSKIY**

Senior Consultant

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**EXPERIENCE**

Paul is a Senior PHA Consultant with BDO PHA Finance; he joined the firm in September 2018. He is responsible for aiding in day-to-day accounting and consulting.

Prior to joining the BDO PHA team, Paul worked as an Accounting Manager for a car dealership. His duties included managing the company's payables/receivables, prepared year end and monthly closing statements, budgets and year end tax returns.

**EDUCATION**

B.S., Business Administration & Accounting, Temple University

**BRANDON TUBBY**

Consultant

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**EXPERIENCE**

Brandon joined the firm in July 2021. He is assisting with the year end close and monthly accounting processes for our team.

Prior to joining the BDO PHA team, Brandon contributed to the Carolina Planning Journal as a write and social media manager. He helped research articles on real estate development topics, public-private partnerships and tax increment financing.

**EDUCATION**

M.S., Accounting, University of North Carolina  
B.A., Public Policy; Minor, Urban Studies & Planning,  
University of North Carolina

**MADISON WAMPLER**

Consultant

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**EXPERIENCE**

Madison is a new member of BDO PHA Finance. She is responsible for aiding in accounting and consulting with our monthly and yearly fee accounting.

Madison has gained her professional experience by working as a Senior Accountant which included preparing and managing financial statements, journal entries, quarterly reporting and year end audit work and assisting in special projects for a bus company.

**EDUCATION**

B.S.B.A., Business Administration/Accounting,  
Kutztown University of Pennsylvania  
AACSB, Master of Business Administration (In progress),  
West Chester University of Pennsylvania



# Fees

# Fees for services

## We are committed to quality, value-added service.

We understand the importance of efficiencies and cost control and have specifically designed our methodologies to provide your engagement team with the tools they need to perform high quality accounting services in as cost effective a manner as possible.

**Work will be completed at hourly rates based on actual effort required. Below is our estimate of the following scope items.**

DESCRIPTION		ESTIMATED FEE
Financial Assessment as described in scope of services	Up to 80 Hours @\$210/hour	\$16,800
Additional Items:		
Other tasks as requested by PCHA	Hourly at Rates listed Below	

Any additional work will be billed at firm standard rates as noted below plus costs for travel and other out of pocket expenditures. Any travel will be billed at government per diem rates when available and as applicable. All billing will be based on work effort required.

STAFF LEVEL	RATE
Partner/Managing Director	\$210
Director	\$195-\$205
Manager - Senior Manager	\$150-\$190
Senior Consultant	\$100-\$145
Accountant	\$100

Hourly rates will be subject to a 5% increase each year, not to exceed \$5 per level.



The background of the slide is a photograph of a modern building's interior. It features a curved glass wall with large windows and several prominent, thick, orange-colored cylindrical pillars. Two men in business suits are walking along a lower level, looking at each other. The lighting is warm, coming from within the building.

# Education

- ▶ National Sponsored Seminars for NASBA CPE
- ▶ Regional Training Sessions Delivered





# National Sponsored Webinars and Group Live Events for NASBA CPE

Continuing Professional Education. We are fully certified through the National Association of State Boards of Accounting (NASBA) to provide live webcast Continuing Professional Education (CPE) credits in Government Accounting.

DECEMBER 2020: Live Webinar Event  
2021: Everything You Need to Know Live Webinar

NOVEMBER 2020: Live Webinar Event  
Intermediate HUD Accounting, Budgeting & Reporting  
HCV & LIPH Tracks

OCTOBER 2020: Live Webinar Event  
Nuts & Bolts of HUD Accounting, Budgeting & Reporting  
HCV & LIPH Tracks  
COVID-19 Accounting & Reporting Update Webinar

JUNE 2020: Webinar Event  
Housing Choice Voucher (HCV) Financials for  
Non-Financial Managers Webinar

MAY 2020: Webinar Event  
LIPH & HCV Supplemental Funding (COVID-19)  
2020 Lease Accounting Webinar

APRIL 2020: Webinar Event  
2020 HCV Funding Implementation - PIH Notice 2020  
Financial Background of CFP Accounting  
Everything you Need to Know FEMA Grants, Preventing  
Inspector General Findings & Disallowance

MARCH 2020 WEBINAR EVENT:  
The Voucher Management System  
Understanding HUD's Two-Year Tool  
The Basics of the Public Housing Assessment System

JANUARY 2020: WEBINAR EVENT  
CY 2020 Operating Fund Boot Camp Webinar

JANUARY 2020: GROUP LIVE EVENT  
HUD Basic Accounting Workshop - Fresno, CA  
RAD Conversion, Accounting and Financial Reporting -  
San Jose, CA

Additional 2020 Live Webinar Events for State  
Associations, HUD and Housing Agencies:

Annapolis (MD) Housing Authority  
Cincinnati Metro Housing Authority  
CVR Consulting  
Hagerstown HA  
Housing Finance Professionals of Alabama  
HUD DEC  
HUD Region 7 & 8  
Minnesota NAHRO

Ohio Housing Association  
Texas Housing Association

# National Sponsored Seminars for NASBA CPE

Continuing Professional Education. We are fully certified through the National Association of State Boards of Accounting (NASBA) to provide group live and webinar based Continuing Professional Education (CPE) credits in Government Accounting. Please visit our website at [www.bdophafinance.com](http://www.bdophafinance.com) for our full course listing.

<p>2019:</p> <p>Everything You Need to Know Las Vegas, NV Orlando, FL Intermediate HUD Accounting and Reporting Chicago, IL RAD Conversion, Accounting &amp; Reporting Philadelphia, PA Dallas, TX Nuts &amp; Bolts of PHA Accounting, Budgeting and Finance San Diego, CA New Orleans, LA</p>	<p>2018:</p> <p>Everything You Need to Know Las Vegas, NV Orlando, FL Intermediate HUD Accounting and Reporting Philadelphia, PA Back to Basics: Track 1 LIPH, Track 2 HCV Orlando, FL New Orleans, LA</p>
<p>2017:</p> <p>Everything You Need to Know Las Vegas, NV RAD: The Other Side of the Coin Philadelphia, PA Marlton, NJ Geneva, NY Nashville, TN Intermediate HUD Accounting and Reporting Chicago, IL Back to Basics: Track 1 LIPH, Track 2 HCV New Orleans, LA Tampa, FL</p>	<p>2016:</p> <p>Everything You Need to Know Las Vegas, NV Budgeting and Subsidy Maximization Strategies Chicago, IL Back to Basics: HUD Accounting New Orleans, LA</p>
<p>2015:</p> <p>Everything You Need to Know Las Vegas, NV Back to Basics: The Year End Close Orlando, FL New Orleans, LA</p>	<p>2014:</p> <p>Budgeting and Subsidy Maximization Strategies Philadelphia, PA (2013 &amp; 2014 sessions) 2014: Everything You Need to Know Pittsburgh, PA / Las Vegas, NV</p>
<p>2013:</p> <p>Everything You Need to Know Las Vegas, NV Back to Basics: The Year End Close New Orleans, LA</p>	<p>2012:</p> <p>Everything You Need to Know Las Vegas, NV Budgeting and Subsidy Maximization San Diego, CA</p>
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# BDO In-house Training Sessions

BDO PHA Finance is nationally recognized for sponsoring in-house training workshops delivered at public housing authorities. By doing this, BDO markets to advise other PHAs in their area about the seminar they are hosting. These PHAs invited send staff at a discounted rate further reducing fees for the hosting agency. This is a win-win scenario for both the PHA and outside attendees.

## 2019 sessions

Rutland Housing Authority RAD Conversion, Accounting & Financial Reporting Rutland, VT 30 attendees	Mobile Housing Board Nuts & Bolts of Accounting, Budgeting & Finance Mobile, AL 20 attendees
Sacramento Housing & Redevelopment Agency RAD Conversion, Accounting & Financial Reporting Sacramento, CA 25 attendees	Philadelphia Housing Authority RAD Conversion, Accounting & Reporting Philadelphia, PA 25 attendees
Philadelphia Housing Authority PHA Advanced Financial Update Philadelphia, PA 25 attendees	DC Housing Authority HUD Accounting & Reporting Washington, DC 15 attendees
Philadelphia Housing Authority HCV Financial Management Philadelphia, PA 25 attendees	Sacramento Housing & Redevelopment Agency Intermediate HUD Accounting Seminar Sacramento, CA 35 attendees
Philadelphia Housing Authority Public Housing, CFP Budgeting and Accounting Philadelphia, PA 25 attendees	

# Regional Training Sessions Delivered

BDO PHA Finance is recognized for providing outstanding educational opportunities through training sessions delivered at regional public housing conferences. BDO PHA Finance also provides custom tailored onsite sessions and workshops for any audience and duration.

In addition to speaking at national and regional conferences, BDO PHA Finance was selected by Rutgers, the State University of New Jersey, and the Public Housing Authority Director's Association (PHADA) to develop and deliver modules of required training for the Executive Director Education Program (EDEP).

## 2019, 2018 & 2017 concurrent spring/summer conference sessions (partial listing)

Ohio Housing Authorities Conference PHA Financial Update Columbus, OH	Illinois Assocs of Housing LIPH Accounting Hot Topics Decatur, IL
Housing Finance Professionals of Alabama Public Housing & HCV Session Gulf Shores, AL	CT NAHRO LIPH Cash Management Two Year Tool Uncasville, CT
Texas Housing Association LIPH Accounting Basics HCV Accounting Basics Duncanville, TX	AZ NAHRO RAD Session Phoenix, AZ
Kentucky Housing Assoc Everything You Need to Know Louisville, KY	2019 NAHRO Summer Conference Financials for Commissioners Boston, MA
NJ NAHRO Financials for Non Financial Managers Atlantic City, NJ	Texas Housing Association LIPH Accounting Basics HCV Accounting Basics San Antonio, TX
West Virginia Association of Housing Agencies Conference Hot Topics in HUD Accounting Canaan Valley, WV	Illinois Association of Housing Authorities Hot Topics in HUD Accounting Decatur, IL
Carolinas Council of Housing Redevelopment & Codes Officials Hot Topics in HUD Accounting Myrtle Beach, SC	New York State PHADA COCC Refederalization Hot Topics in Accounting
2018 NAHRO Summer Conference HOTMA Update San Francisco, CA	NJ NAHRO RAD Accounting Financials for Non Financial Managers Atlantic City, NJ

# Regional Training Sessions Delivered

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continued

Shreveport Housing Authority Back to Basics TRACK 1 LIPH & TRACK 2: HCV Shreveport, LA	Cuyahoga Metropolitan Housing Authority LIPH/HCV HUD Financial LEADERSHIP training Cleveland, OH
Virginia Association of Housing and Community Development Officials Richmond, VA	Carolinas Council of Housing Redevelopment & Codes Officials Financial Fundamentals for Commissioners Myrtle Beach, SC
Alabama Association of Housing and Redevelopment Authorities Public Housing Updates Birmingham, AL	Tennessee Association of Housing and Redevelopment Officials Hot Topics in HUD Accounting (1 day) Franklin, TN

# Regional Training Sessions Delivered

## Sessions conducted prior to March 2017:

PAHRA Capitol Conference 1. HOTMA Financial updates 2. SE PHAS 3. HCV updates Harrisburg, PA 25 attendees	Kentucky Housing Association HCV Accounting updates LIPH Accounting updates Elizabeth, IN 26 attendees
Prince George's County Housing Authority LIPH Accounting Basics HCV Accounting Basics Largo, MD 12 attendees	PHADA Commissioners Conference 2017 1. COCC Refederalization 2. SE PHAS updates Orlando, FL 125 attendees
East St. Louis Housing Authority Custom financial report training for managers East St. Louis, IL 15 attendees	Texas Housing Association LIPH Accounting Basics HCV Accounting Basics Dallas, TX 12 attendees
Lucas Metropolitan Housing Authority HCV Program Financial training Toledo, OH 10 attendees	AR NAHRO RAD one day session Little Rock, AR 19 attendees
SERC Fall Workshop Hot Topics in HUD Accounting Asheville, NC 35 attendees	PAHRA Summer Conf COCC refederalization Bedford Springs, PA 25 attendees
NAHRO fall conference COCC refederalization New Orleans, LA 80 attendees	Kentucky Housing Association LIPH/HCV updates Bowling Green, KY 20 attendees
Metropolitan Housing Authority RAD one day session Nashville, TN 20 attendees	NAHRO summer conference Financials for Commissioners Portland, OR 75 attendees
HUD FMC training HCV program 3 day intensive Kansas City, MO 30 attendees	

# Regional Training Sessions Delivered

West VA Association of Housing Authorities SuperCircular and OIG hot spots for small PHAs Charleston, WV 25 attendees	East St Louis HA Financial training for finance staff Financial training for management staff East St. Louis, IL 20 total attendees
Reading Housing Authority LIPH Funds Management HCV Funds Management Reading, PA 12 attendees	VAHCDO (Virginia Association) OIG & Procurement Hot Spots Cost Cutting in 2016 Virginia Beach, VA 50 attendees
Housing Authority of the County of San Joaquin Property management financial cues Stockton, CA 6 attendees	Carolinas Council of Housing & Redevelopment Officials Financial Updates for Commissioners Myrtle Beach, SC 75 attendees
NJ NAHRO/MARC NAHRO Important Accounting Updates Atlantic City, NJ 30 attendees	IAHA Flying Colors: Crush Your Audit 2 day workshop Decatur, IL 25 attendees
TAHRA (Tennessee Association) Hot Topics in HUD Accounting & Funding Franklin, TN 65 attendees	CMHA (Cuyahoga Metro Housing Authority) PHAS 1 day session Cleveland, OH 27 attendees
THA (Texas Housing Association) LIPH Funds Management HCV Funds Management Dallas, TX 20 attendees	PHADA Commissioner's Conference 2016 Cost Cutting in 2016 Protecting Operating Reserves Miami, FL 200+ attendees
NYS PHADA HUD Accounting Updates Verona, NY 35 attendees	CMHA Lead Training HUD Compliance: The Law of the Land Cleveland, OH 26 attendees
Texas Housing Association Everything You Need to Know San Antonio, TX 14 attendees	Kentucky Housing Association 1 day Financial Management LIPH 1 day Financial Management HCV Louisville, KY 15-20 attendees
Texas Housing Association LIPH Funds Management (2 days) HCV Funds Management (1 day) San Antonio, TX 20 attendees	PAHRA Conference Panelist -RAD panel Valley Forge, PA 35 attendees

# Regional Training Sessions Delivered

NAHRO The OIG & Asset Management Mastering Financials for Commissioners Los Angeles, CA 50-80 attendees	Florida Association of Housing and Redevelopment Officials (FAHRO) Panelist - Tax Credit & RAD Orlando, FL 35 attendees
CT NAHRO The Super Circular at Your PHA Mohegan Sun, CT 50 attendees	Fort Wayne Housing Authority Asset Management in 2015 Fort Wayne, IN 10 attendees
Texas Housing Association (THA) Belt Tightening in 2015 Seven Deadly Sins of Procurement Galveston, TX 75 attendees	Housing Authority of New Orleans Budgeting for Property Managers New Orleans, LA 35 attendees
NAHRO RAD Accounting and Reporting Austin, TX 115 attendees	VAHCDO Subsidy Maximization Tips Asset Management and the OIG Financial Management in HCV Program Virginia Beach, VA 50 attendees
Cuyahoga Metropolitan Housing Authority Technical Accounting Updates/LEAD training Cleveland, OH 40 attendees	NJ NAHRO OIG cracks down on HUD Asset management HUD Accounting Updates in 2015 Atlantic City, NJ 20 attendees
SERC-NAHRO 2015: Everything You Need to Know Louisville, KY 55 attendees	TAHRA Hot Topics in HUD Funding and Reporting Murfreesboro, TN 40 attendees
MAHRA/MARC-NAHRO PHAS Scores & Proration HCV Financial Management Ocean City, MD 15 attendees	NYS PHADA General Financial Update for PHA Finance Staff A Financial Guide into RAD Verona, NY 35 attendees
Western PA Director's Association LIPH Financial Updates (1 day) HCV Financial Updates (1 day) Indiana, PA 30 attendees	Texas Housing Association (THA) PH Fund Management Mt. Pleasant, TX 21 attendees
West VA NAHRO Everything You Need to Know 1 day session Parkersburg, WV 16 attendees	Texas Housing Association (THA) HCV Fund Management Dallas, TX 8 attendees



# Regional Training Sessions Delivered

IAHA Subsidy Maximization Tips PHAS Score Maximization Tips Decatur, IL 22 attendees	Texas Housing Association (THA) PH Fund Management/HCV Fund Management San Antonio, TX 23 attendees/15 attendees
HCV Financial Management 1 day session Custom onsite session Orange, NJ 30 attendees	PAHRA Capitol Conference Asset Management & the OIG Harrisburg, PA 20 attendees
Elk County Housing Authority Procurement & Your PHA (Custom) Johnsonburg, PA 12 attendees	PHADA & Rutgers Executive Director Education Program (EDEP) PHAS & SEMAP day long certification course Financial Management day long certification course About 36 attendees in current course cycle
Lehigh County Housing Authority Procurement & Your PHA (Custom) Emmaus, PA 7 attendees	Reno Housing Authority Back to Basics: HUD Accounting Reno, NV 21 attendees
PHADA Commissioner's Conference Asset Management & the OIG PHAS & Sequestration for Commissioners HCV VDS vs. FDS St. Petersburg, FL 100-250 attendees per session	Virgin Islands Housing Authority Various Webinars: Asset management, PHAS, Operating Subsidy, Chart of Accounts, HCV Management Attendees: 1-25
Texas Housing Association 2015: Everything You Need to Know - Jan 2015 Austin, TX 17 attendees	Michaels Development Corporation Operating Subsidy Calculation Marlton, NJ 20 Attendees
Allegheny County Housing Authority PHAS 1 day session Pittsburgh, PA 31 Attendees	Texas Housing Association Annual Conference HCV Funding: Surviving 2014 This Year's Need to Know Financial topics for LIPH & Mastering Financials for Commissioners Ft. Worth, TX 65 attendees
Fayette County Housing Authority Procurement & Your PHA (Custom) Uniontown, PA 28 Attendees	PAHRA Summer Conference Mixed Finance Development Roundtable facilitator Pittsburgh, PA 25 Attendees
Cuyahoga Metro Housing Authority Leadership Training Modules: Asset Management, PHAS, SEMAP and HUD Compliance Cleveland, OH 30 Attendees	Charleston-Kanawha Housing Training Back to Basics: The Year End Close Charleston, WV 19 Attendees
Cuyahoga Metro Housing Authority Asset Management Training Cleveland, OH 25 Attendees	NAHRO Summer Conference PHAS for Commissioners & Financials for Commissioners Tampa, FL 200+ attendees

# BDO Culture and Values

Our culture and core values reflect how we manage our work, our relationships, and ourselves. The following core values embody the standards by which we conduct ourselves and the standards you can expect in all our dealings with you as a client:

## PEOPLE FIRST

- ▶ Care
- ▶ Earn trust and be trusting
- ▶ Be respectful
- ▶ We before me!

## EMBRACE CHANGE

- ▶ Be forward thinking
- ▶ Lead the way
- ▶ Grow and help others grow
- ▶ Move to improve!

## CHOOSE ACCOUNTABILITY

- ▶ Take personal responsibility
- ▶ Be humble
- ▶ Mind the bottom line
- ▶ Do what you say you'll do!


## EXCEPTIONAL: EVERY DAY, EVERY WAY

- ▶ Have integrity
- ▶ Be a true professional
- ▶ Everyone is a client
- ▶ Model excellence!

## EMPOWERMENT THROUGH KNOWLEDGE

- ▶ Listen intently
- ▶ Be direct
- ▶ Share what you know
- ▶ Be curious!





BDO is the brand name for BDO USA, LLP, a U.S. professional services firm providing assurance, tax, and advisory services to a wide range of publicly traded and privately held companies. For more than 100 years, BDO has provided quality service through the active involvement of experienced and committed professionals. The firm serves clients through more than 60 offices and over 700 independent alliance firm locations nationwide. As an independent Member Firm of BDO International Limited, BDO serves multi-national clients through a global network of more than 88,000 people working out of 1,617 offices across 167 countries and territories.

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Due to the Software Conversion, we do not currently have an Entity-Wide Financial Report.

## AFFORDABLE HOUSING DIVISION BOARD REPORT

September 2022

The Affordable Housing team continues to provide quality customer service to residents and public of our eight affordable housing complexes while navigating the continued impacts of the pandemic, staffing, and economy.

### HIGHLIGHTS

#### YARDI, YARDI, YARDI

- Working with Finance Department and Wise Consulting, there is now a plan in place for migrating ending tenant balances from legacy system into Yardi. It is anticipated that the data migration will be by end of first week of October. Then, the Affordable Housing staff will audit the 670 accounts for accuracy and make corrections as needed. It is anticipated that the audit will take approximately 200 staff hours to complete; and assuming the data migration timeline is successful, the audit will be completed before the November 2022 rent charges are posted.

#### RESIDENTS/TENANCIES

- Focus on coordination with maintenance specialists for making apartments rent-ready, and then making available to Project Based Voucher program (priority) and then to market, process applications, and rent to public/community (secondary).
- Improving service to residents and community, property management staff now have work schedules that provide for Monday through Saturday customer service for the entire Affordable Housing portfolio.
- Evictions (1% of total portfolio) – we, unfortunately, have come to place where it is necessary to pursue legal action against residents who are not abiding by rental agreements, including non-payment, and/or whose tenancies are affecting the use and enjoyment of other residents and/or creating property damage. In September 2022, there were three (3) cases in court and two Writs of Restitution issued. Two cases were non-payment balances over \$10,000 and \$20,000, respectively; and One case due to termination of Project Based Voucher program participation. There was one (1) physical eviction by Sheriff deputies when tenant did not voluntarily vacate by date provided by Sheriff's office.
- Reports on Delinquencies, Vacancies, and Move-Ins/Outs will return to this monthly report after the migration of tenancy account data from legacy software system into Yardi. It is anticipated that these reporting points will be available for the November 2022 Board meeting.

#### STAFFING

- New staff
  - As reported in August 2022 report, two new staff were hired as Assistant Property Managers and they are Lawanda Lambert and Whitney Grays.
  - Resident Services Specialist (RSS) Alisha Brown was hired and began this month.
  - All scheduled to be introduced at September Board of Commissioners meeting.
- Staff pairs/teams are managing the properties as follows:
  - Patti Carson and Alisha Brown – Chateau Rainier (248 units/households)
  - Ebonique Moore and Whitney Grays – DeMark and Lakewood Village (228 units/households)
  - Kendal Stearns and Lawanda Lambert – Brookridge, Hidden Village, Montgrove Manor, Oakleaf, Village Square (194 units/households)

Report Date 9/22/2022, McLeod, C.L.



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## REPORT OF MAINTENANCE DIVISION

September 2022

### STAFF PROJECTS

- I. Chateau Rainer (248 units)  
D101, D208, and Q105, were completed to make ready status. About 74 work orders were completed this month. Painting exterior portions of E, F, J, M, N, and S buildings were completed. This was a requirement from our lender.
- II. Demark (93 units)  
C110, D107, and D204 were completed to make ready status. Exterior portions of "A" building were repainted due to replacement of the building intercom call boxes. 18 work orders were completed this month.
- III. Lakewood Village (136 units)  
Parking lot striping and numbering was completed property wide which was a requirement of our lender. As a part of the process ADA designated stalls received new signage. 27 work orders were completed this month.
- IV. Low Income Public Housing (124 homes)  
The roofs and gutters were cleaned at 5, 14, 38, 66, 76, 89, 91, 113, 147, 152, 158, 161, 168, and 176. Uniform Physical Conditions Standards inspections were completed at 33 and 160. 19 work orders were completed this month.

### TRAINING AND DEVELOPMENT

- I. This month's safety meeting will cover "Walking & Working Surfaces" which will explain the hazards of walking surfaces, how to identify hazards, and preventative measures.

## PROJECT MANAGEMENT REPORT TO PCHA BOARD OF COMMISSIONERS

September 28, 2022

### SECTION 18 DISPOSITION

1. Project Timeline: **Application submitted by ED, and received by HUD on 8/25/2022.**
  - a. HUD predicts approval could take in excess of 90 days
  - b. We've been in contact with HUD SAC reviewer, answering various typical questions.
2. Methods of Sale: Both at *Fair Market Value (FMV)*
  - a. Negotiated Sale
    - i. Currently crafting a Request for Proposal (RFP) seeking affordable homeownership non-profits
      1. Expect to advertise RFP by October 31, 2022
    - ii. Surveys will be sent to current residents to determine interest and capacity to purchase homes they occupy.
      1. Formal 90-day Notice will be sent upon application approval. This formally notifies residents about need and shortest timeline for PCHA to relocate residents, and the offer to sell to residents.
  - b. Public Bid
    - i. Prioritized campaign toward current tenants, FSS participants, and other Section 8 voucher holders.
      1. All prospective purchasers must independently qualify with lending institution of their choice, within reasonable time.
      2. PCHA may accept as low as 80% of FMV without HUD approval
    - ii. Remaining units publicly listed via MLS.
      1. PCHA may advertise for new Broker services so that we might preference a WMBE contractor.

### OF INTEREST

1. City of Lakewood CBDG grant for exterior paint at both Oakleaf and Village Square.
  - a. PCHA has final draft of subgrantee agreement. Total amount \$180,000.
    - i. Environmental review still pending by City of Lakewood.
    - ii. Advertisement for work will happen once officially signed.
2. Engaged local architect to commence with renovation plan at 1525 108<sup>th</sup> St.
  - a. Pre-development meeting with County happened on Wednesday, Sep 21.
    - i. Will present feasibility information at October Board meeting.

- b. Tacoma Water is in the process of declaring as surplus the .68/acre parcel on Ainsworth, adjoining 1525 108th St and the Maintenance warehouse.
  - i. PCHA in communication with TW regarding acquisition.

### 2022 ANNUAL PLAN AND 2023 FIVE YEAR PLAN

- 1. Annual plan to be presented to RAB Sep 29. Includes expenditures for some capital work (septics, LIPH 009).
- 2. Five Year Plan will require input from RAB and PCHA Board.



## SUPPORTED HOUSING BOARD REPORT

September 2022

### YARDI SOFTWARE CONVERSION

- Go live date was July 1, 2022. We have spent the majority of the last 3 months reconciling actions in our legacy database, MRI and our new database Yardi. We will continue the practice of reconciling/auditing between both databases but now the reconciliation process will include HUD's database PIC for VMS/funding purposes.

### VASH (Veterans Administrative Supportive Housing)

- PCHA is very close to signing an MOU in partnership with the Veterans Administration, Tacoma Housing Authority and the Paragon group for 16 units at a property in Fife for homeless veterans that is expected to start leasing/housing in October. PCHA and THA hopes to finalize the MOU the week of the 27<sup>th</sup>.  
There will be an additional complex that will come on line with the same partnership and under the same MOU early next year in Tacoma for an additional 16 units. There have been some setbacks with the rehabilitation of the complex on Hosmer but the Fife location is still on track for October leasing.
- PCHA received a letter of support from the VA to apply for additional VASH vouchers. PCHA has a lot of interest from the VA to project based more VASH vouchers in various housing types such as tiny homes, a few different projects in the works.
- PCHA has been asked by the VA to partner and become a participating member of the Puget Sound GEC/VASH board. The group will look for ways to house and subsidize our aging veteran community outside of traditional housing methods. I participate in my first meeting on the 27<sup>th</sup> with the National HUD/VASH team along with other Housing Authorities to learn what worked for them and how they created policies to subsidize the veterans in untraditional housing that is not currently a part of PCHA's administrative plan such as assisted living units or dorm type housing.

### EHV (Emergency Housing Vouchers)

- As of September 21, 2022 the national average for leasing utilization is 47.15%. PCHA is currently sitting at 68% leased with another 23 referrals received from the COC that are issued and looking for units. We have 0 referrals in progress from the COC.

### 2023 PAYMENT STANDARDS

- The 2023 Payment Standards have been released. The average increase for 0 to 3 bedrooms was 11.23%. The average increase for 4 to 8 bedrooms was about 6%. They will go into effect on December 1, 2022.

## 2022 HRSA (Health Resources and Services Administration) Region 10 Health Equity Conference

- Pierce County Housing Authority received a request from the HUD Field Office to present at the Health Equity Conference hosted by DSHS/HRSA on September 15th. In partnership with Tacoma Housing Authority, Community Health Plan of Washington and Tribal Healthy Homes Network, I was able to speak about Health, Housing, and Homelessness. I discussed how partnerships that PCHA has created have had to evolve over the years from only providing financial and credit services to include other essential long term wrap around services such as mental health, substance abuse, and criminal history that create barriers in housing that disproportionately affect BIPOC communities.