

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 decide 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.

EIC Policy

EIC will employ one FSS Coordinator 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, service coordination 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].

EIC Policy

EIC may allow 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 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 conducting 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.

EIC Policy

EIC will make funds available to provide administrative costs under the Section 8 Housing program if needed.

3-I.E. SUPPORTIVE SERVICES FEES AND COSTS

Section 8 FSS Supportive Services

In the Section 8 program, the PHA may only fund reasonable and eligible FSS supportive service costs in the FSS program from unrestricted net position if those funds are taken from pre-2004 Administrative Fee Reserve. Post 2003 administrative fee reserve and/or unrestricted net assets may only be used for other housing purposes not FSS supportive services [Notice PIH 2015-17].

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

In addition to 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.

EIC Policy

EIC will make funds available from the unrestricted net position and forfeited escrow funds to provide supportive service cost under the Section 8 HCV program as needed.

3-I.F. TREATMENT OF FORFEITED FSS ESCROW ACCOUNT FUNDS

In addition to HCV unrestricted net position, 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 (see definition in Section 2-IV.A.). 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, stipends to FSS participants who represent FSS participants on the program coordinating committee, and other costs related to achieving obligations outlined in the contract of participation as well as training for FSS program coordinators [FAQ on FSS Final Rule Implementation 7/23/23, For21].

EIC Policy

The PHA 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.

The PHA may use forfeited escrow for monthly \$100 stipends to FSS participants who represent FSS participants on the program coordinating committee. Due to the unknown nature of the balance available in the forfeited escrow account, these stipends are neither periodic nor predictable.

The PHA will use forfeited escrow accounts for training provided to FSS Coordinators.

The PHA 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)

The PHA 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).

The PHA 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.

The PHA 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.

The PHA will prioritize requests for funds from forfeited escrow accounts initially on a first come first served basis determined by 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 wellbeing 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.

The PHA will, on occasion, distribute a portion of the forfeited escrow funds evenly among FSS participants in good standing.

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.

EIC Policy

EIC is an HCV program. However, the use of the conference rooms, classrooms, or grounds of the EIC property will be allowed to supply supportive services such as training when needed.

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, 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.

EIC Policy

The PHA's representatives to the program coordinating committee will be:

Dr. Landon B. Mason, Executive Director

Tamisha Goff, Section 8 Housing Director

Robin Robertson, HCV Accounts Payable Specialist

Christopher Messer, FSS Program Coordinator

Program Participants (1-2)

CSBG Success Coach

Head Start/Early Head Start Family Advocate

Local Bank (Truist Appointee)

District Social Worker Public School

Department of Social Services

Workforce Development (NC Works)

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.

EIC Policy

EIC may 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.

EIC Policy

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

Community Service Block Grant

Head Start/Early Head Start

Workforce Development (NC Works)

Truist Bank

Royalty Financial Futures

District Department of Social Services Representative

Department of Social Services

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).

EIC Policy

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

EXHIBIT 3-1: CHART FOR DETERMINING PCC MEMBERSHIP

Organization or Service Type	Organization Name	PCC Member Title	PCC Member Name
Housing	PHA Housing Counseling Agencies	Exec Director FSS Coordinator	Dr. Landon B. Mason Christopher Messer
GED and Educational Training	Community College Adult Education Workforce Investment Center (NC Works)	Workforce Counselor Director FSS Coordinator	Workforce Dev. Appointee Christopher Messer
High School	Public High School Charter High School	Dist. Social Worker	Dist. Social Worker Appointee
Job Training	Community College Adult Education Workforce Investment (NC Works)	FSS Coordinator Dist Social Worker NC Works	Christopher Messer Dist Social Worker Appointee NC Works Apointee
Job Search, Placement, Retention	NC Works CSBG	Workforce Counselor CSBG Success Coach	NC Works Appointee Gregory Boston
Transportation	Inter County Transit CSBG	FSS Coordinator CSBG Success Coach	Christopher Messer Gregory Boston
Homeownership	First-Time Homebuyers	Truist Bank Appointee	Lisa Turner or Appointee
Child Care	Head Start Early Head Start	Headstart Family Advocate	Cynthia Jones
State/County Government	Chowan County Department of Social Services	Interim Director	Chowan County Department of Social Services Appointee
Child/Adult Protective Services	Dept of Social Services	Interim Director	Dept of Social Services Appointee
Financial Institutions	Truist Bank	Truist Bank Appointee	Lisa Turner or Appointee

Organization or Service Type	Organization Name	PCC Member Title	PCC Member Name
Legal Services	Legal Aid of NC	FSS Coordinator referral to services	Christopher Messer
Debt Resolution Services	Consumer Credit Counselors Financial Literacy	FSS Coordinator referral to services Royalty Finance Future Director	Christopher Messer Appointee