Extending the Family Self-Sufficiency Program to the Multifamily Affordable Housing Sector: Insights From an Emerging Field of Practice

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Abstract

Although the Family Self-Sufficiency (FSS) program was initially restricted to public housing agencies (PHAs) when Congress created it in the early 1990s, administrative eligibility for the program was expanded in 2015 to owners receiving project-based rental assistance. A first wave of multifamily providers soon began to offer the FSS program to their residents without designated coordinator funding, and in 2023, the U.S. Department of Housing and Urban Development awarded the first grants that multifamily groups could use to help cover the costs of program administration and staffing.

This article assesses the experience of the early adopters of the FSS program in the multifamily sector, describes distinct implementation dynamics between multifamily housing owners and PHAs, and presents a set of emerging best practices that can maximize the program's impact. Interviews with staff in multifamily housing organizations administering or considering the FSS program illuminate a set of program challenges and opportunities for effective program administration and future expansion. With concerted support from HUD, Congress, and practitioners, the FSS program can expand its reach and effectively support the integration of a meaningful and accessible asset-building opportunity into the delivery of federal housing assistance in the multifamily sector.

Introduction

In 1990, Congress established the Family Self-Sufficiency (FSS) program at the urging of Republican U.S. Department of Housing and Urban Development (HUD) Secretary Jack Kemp, who believed that families receiving housing assistance should have access to a financial incentive to increase their earnings. Families typically pay 30 percent of their adjusted gross income for rent, and the HUD-funded subsidy covers the difference between what the family pays and the fair market rent for that unit. When families raise their earnings, their rents increase, too, and the subsidy amount decreases. Families enrolled in the FSS program who increase their income can capture the corresponding rent increase in an escrow savings account, and the HUD subsidy holds steady at the amount that was paid when the participant first entered the program. Participants can access any accumulated funds after meeting the program goals of employment and being free of cash public assistance. By combining the FSS program's savings opportunity with access to support services, families can leverage their housing assistance to improve their financial circumstances and chart a pathway out of poverty.

For the program's first 25 years, only public housing agencies (PHAs) could administer FSS programs and enroll families living in their units or using their housing vouchers. Participating PHAs received funding to support the escrow and pay for coordinators supporting enrollees. Residents in privately owned housing with HUD Section 8 project-based rental assistance (PBRA) contracts were not initially able to participate in the FSS program. However, that restriction changed in 2015 when Congress expanded eligibility to PBRA multifamily housing providers to offer the FSS program to their residents.[1] Because PBRA is one of the primary pillars of the federal affordable housing system, delivering the FSS program to families living in PBRA properties can dramatically extend its reach and impact (Cramer and Lubell, 2011).

Nevertheless, Congress did not initially allocate additional resources for owners operating FSS programs to cover staffing and program administration costs. PBRA owners could apply to HUD for authorization to operate FSS programs for their residents and allow for the same escrow saving mechanism, but the owners had to identify other resources to fund the administration of their program. A small number of multifamily providers took advantage of this opportunity starting in 2016. In 2023, HUD awarded the first grants that multifamily groups could use to help cover the costs of program administration and staffing. Assessing the experiences of the early adopters of FSS programs in the multifamily sector can sharpen implementation and inform future efforts to expand the program.

To understand how multifamily housing organizations view the opportunity and potential benefits posed by the FSS program, the authors conducted a series of interviews with staff currently administering or considering launching the FSS program.[2] Program staff interviews were conducted at 13 organizations, identified in exhibit 1. Six of the organizations had already begun delivering the FSS program at specific sites; the others were exploring the opportunity or preparing to launch an initial program. Most of the groups represented were nonprofit organizations with a mission-

[1] In 1974, the PBRA program was created to subsidize the rents of low-income individuals and families through rental assistance contracts between HUD and private property owners. Today, PBRA serves more than 1.3 million low-income households in more than 17,500 properties (CRS, 2023).

[2] Reid Cramer has been evaluating the performance of the FSS Program since 1999, first as a staff member of the Office of Management and Budget, then as director of the Asset Building Program at New America, a non-partisan policy think tank, and more recently working with non-profit housing and social service organizations focused on policy development and program delivery. Meaghan McCarthy works with member organizations of the Housing Partnership Network to support program delivery, and previously was responsible for legislative oversight of the FSS program as a professional staff member on the Senate Appropriations Committee, Subcommittee on Transportation and Housing and Urban Development.

driven orientation. The interviews covered various topics, including organizational goals and dynamics, program implementation and strategies, administrative challenges and impediments, and opportunities for program growth and expansion at other sites.

This type of qualitative research is an appropriate choice for evaluating the experience of early adopters. In supplementing the practitioner interviews with consultations with other experts in the field and a review of available research, this article describes a set of insights and emerging best practices that can serve as a foundation for further program expansion. These experiences specifically inform a set of potential next steps that policymakers, practitioners, and field builders can pursue to make the FSS program more effective in supporting families living in assisted housing to realize their economic mobility aspirations.

Exhibit 1

Organizations With Interviewed Staff	
• The Caleb Group	• Linc Housing
• The Community Builders	• Mercy Housing
• Chicanos Por La Causa	• MidPen Housing
• CommonBond Communities	• Operation Pathway
• Compass Working Capital	• Preservation of Affordable Housing (POAH)
• EAH Housing	• WinnCompanies and Connected Communities
• Eden Housing	

The Expansion of the FSS Program Into the Multifamily Sector Has Been Gradual and Is Accelerating

As experience with the FSS program accrued among PHAs, advocates began to recommend expanding the program so more housing assistance recipients could leverage their housing stability to achieve their economic mobility goals. Advocates argued that the potentially valuable opportunity to allow residents to escrow rent increases should not be limited to residents who receive subsidies through PHAs but should be available to tenants receiving rental assistance through private owners.

When Congress expanded the eligibility of the FSS program to include PBRA properties in 2015, private owners with PBRA contracts could apply to HUD to offer the FSS program to their residents. One of the first groups to pursue this opportunity was the Preservation of Affordable Housing (POAH), which launched four sites in 2016 and three additional properties by 2017. During this period, HUD began to focus on enhancing program effectiveness: a new FSS program guidebook was released alongside training materials, and technical assistance opportunities were offered for existing and prospective programs (CBPP, 2020). Most of the released materials focused on the experience of PHAs with the program. In 2018, Congress authorized additional amendments to program rules with bipartisan support, launching a new era for FSS.[3]

[3] FSS program amendments are included in Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (Public Law 115–174).

Among the most significant changes in the reforms was the permanent extension of the authority to administer the FSS program to multifamily affordable housing providers, including for-profit and nonprofit organizations. These organizations would be eligible to receive FSS program funding awards or cooperate with a local PHA that agrees to provide case management services to families residing in units supported by PBRA. Statutory changes were not enacted until final regulations and new program rules were issued in May 2022 (HUD, 2022b).

Federal Funding and Policy Development

Along with these legislative developments, federal funding for the FSS program has steadily and significantly increased in recent years, enabling HUD to allocate more resources to multifamily programs. After years of flat funding (e.g., $75 million annually from FY 2014 to FY 2018), congressional appropriations have increased as HUD was overseeing the process of final rulemaking, rising steadily from $80 million in FY 2019 to $141 million in FY 2024, exceeding the administration's request of $125 million (HUD, 2023).

The increased funding for the FSS program allowed HUD to renew support for existing FSS programs and to release an FSS notice of funding competition for new programs in 2022. This funding competition led to the announcement of the first federal grants for FSS multifamily programs in January 2023, with $3 million awarded to 38 projects, including nonprofit and for-profit affordable housing providers. In HUD's Congressional Justification, submitted with the Biden Administration's FY 2024 budget request, HUD reported that the response to the funding opportunity was "outstanding" and that more than 150 eligible submissions went unfunded (HUD, 2023). A subsequent round of awards to FSS PBRA programs increased the total number of PBRA properties with funded FSS programs to 97 (HUD, 2024). This increase reflects an interest in the multifamily sector that is currently exceeding available funding and signals a new era for the FSS program in which multifamily groups are increasing their participation, which will help reshape the field of practice.

Perceived Benefits of the FSS Program by Early Adopter Multifamily Organizations

Although the perspectives of interviewees varied, along with their degrees of experience with the program, a prevailing belief among staff is that the FSS program offers unique and valuable benefits for eligible residents. The combination of recently finalized program rules and the prospect of future funding has sparked sufficient momentum among policymakers to justify an organization's strategic engagement with the program. Three distinct themes emerged when staff considered the potential benefits of the FSS program for their organization and the residents they serve.

- ***The FSS program enables housing organizations to offer their residents a tangible "asset-building" opportunity that is not otherwise available.***

Although the delivery of affordable housing is a primary strategic objective, multifamily housing providers often aim to do more for their residents than ensure they have a roof over their heads. Mission-driven organizations strive to help families leverage residential stability to achieve other personal and economic goals. The FSS program offers a means to augment the resident services provided with a financial incentive for families to increase their earnings and build a pool of assets for future use.

The ability to save the portion of increased earnings in an escrow account that would otherwise go to higher rents is a meaningful opportunity that can "pay off" over time. Most multifamily housing organizations are unaware of any other program that can generate access to funds anywhere near the average escrow balance of FSS program graduates, which HUD data reports is more than $9,000 (HUD, 2023). For program participants able to increase their earnings and graduate, this level of cash infusion is at a scale that can make a material difference in their lives. Housing providers can support the escrow savings for participants as their income grows without losing any financial resources because the subsidy amount provided by HUD holds steady. Many providers appreciate the program's rule that does not require a family to move or forfeit their assisted housing if they receive a disbursement of escrowed funds. Although families have greater financial stability after graduation, continued access to affordable housing is a priority because, in many communities, market-rate housing remains out of reach for low-income families.

- ***FSS can catalyze the journey to homeownership.***

For residents striving to become homeowners, the FSS program is a valuable tool. Participation in the program can offer access to valuable services that support the homebuying process. Services include referrals to housing counseling programs and financial coaching, which focuses on activities that can raise a participant's credit score, which, in turn, can make qualifying for a mortgage possible and more affordable. The most significant benefit is that the FSS program offers a structure for participants to save for a downpayment on a home. Money diverted into FSS escrow accounts from rising wages can build a pool of resources to facilitate a home purchase. These characteristics make the FSS program a potential linchpin for a homeownership strategy designed to support recipients of federal rental assistance. HUD data reinforce these sentiments, which report that 33 percent of FSS program graduates exited rental assistance within 1 year, and one-third of these families went on to purchase a home (HUD, 2022a). This information compares to the exit rates reported in one longitudinal study across the suite of HUD housing assistance programs, which found an average annual exit rate of 14 percent for the Housing Choice Voucher (HCV) program, 18 percent for public housing, and 17 percent for project-based rental assistance (McClure, 2018). Although researchers have more to learn about the reasons behind these exits, available data support the assumption that some FSS program graduates may have improved their financial circumstances, so their need for housing assistance is reduced.

- ***FSS can be a means to enhance the provision of resident services.***

Multifamily affordable housing organizations recognize the value of having their residents access additional support services. This recognition can be translated into helping families achieve their economic mobility goals and is good for the stability of the property, yet finding and allocating the resources necessary to support these services is often elusive. There is widespread acknowledgment among housing providers that current models and funding levels undersupport resident services. The FSS program does not solve this problem for the field because it does not fund support services directly. However, the program offers a means to acquire funding to cover some of the staff costs associated with delivering resident services for FSS participants, including case management and service coordination.

Organizations offering individual FSS programs can tailor their programs to highlight specific objectives and related services. Even though various services can add value for specific households, participants in the FSS program can benefit financially if they are able to increase their earnings. This financial benefit places a premium on services that help families overcome barriers to employment, such as childcare and transportation; enhance their skills to increase their earnings with workforce development and training programs; or assist in managing their finances through financial coaching or educational programs.

Multifamily housing organizations often work to identify a range of services offered in their communities where they can build partnerships and refer their residents. Many program staff identified “building partnerships” as a primary ingredient for programmatic success. Many communities have existing programs and networks that support residents, and forging links with these groups through the FSS program can benefit residents and the sponsoring multifamily provider. The prospect of a future funding stream capable of supporting the ongoing resident services and administrative costs of the FSS program is particularly attractive for multifamily providers, who often strive to provide services but lack access to stable funding sources. One organizational leader observed that the FSS program “serves our mission and adds to our value proposition as a housing partner.”

Distinctions Between the Experiences of Multifamily Providers and PHAs Implementing FSS

For most of its history, the FSS program was operated exclusively by PHAs and administered by HUD’s Office of Public and Indian Housing. When Congress began to expand eligibility to recipients of PBRA in 2015, HUD’s Office of Multifamily Housing assumed an oversight role for its grantees. The 2018 amendments to the FSS program envisioned a unified program whose rules apply to housing providers regardless of the funding stream used to provide the rental subsidy. This vision reflects the intention among policymakers that the specific subsidy stream should not determine the quality of a participant’s experience in the FSS program.

Major differences in how HUD delivers rental assistance to housing providers affect the functioning of individual FSS programs. At the same time, lessons from the experience of PHA programs—and HUD-approved processes—offer ways to improve the implementation of FSS in the multifamily sector.

One key difference is how HUD funding flows to PHAs versus multifamily groups. Even though PHAs receive rental subsidies through multiple funding streams, including the public housing operating fund and tenant-based rental assistance vouchers, they operate one FSS program available to all eligible residents they serve across the HUD programs they operate. By contrast, PBRA contracts are executed between HUD and the owner who provides rental subsidies to specific properties. In many cases, the owners are single entities created to facilitate the financing of affordable housing at a specific site; however, in most cases, they are operating multiple properties and providing services to residents across their portfolio. In implementing the FSS program in multifamily assisted housing, HUD ties the program to a specific property, which can create administrative challenges and impediments for program participants.

For program participants in PBRA properties, aligning ties to a specific property means that if participants move, they cannot continue participating in the FSS program and must leave all program benefits behind. FSS program participants in PHA programs can continue their participation if they move. For residents with housing vouchers moving to another unit, their FSS program status does not change. For participants who move to another PHA jurisdiction that runs the FSS program, HUD allows for "portability" of FSS program participation.[4]

On the administrative side of FSS multifamily programs, HUD delivers funding tied to a specific property and requires owners to have site-specific FSS action plans. In practice, multifamily providers operating individual FSS programs at multiple sites will have some administrative services performed at the enterprise level, such as managing escrow accounts and training staff. In general, the administrative flexibility afforded to PHAs allows them to operate larger programs and take advantage of some that create economies of scale that multifamily providers cannot currently access.

Streamlining some of the processes for multifamily FSS programs at an enterprise level can address this disparity. For example, under the current structure, action plans are approved at a property level by the office where the property is located, and the requirements for approval could vary by field office. A more efficient process that allows for a single action plan at an enterprise level or approval at HUD headquarters instead of each field office could enable program operators to be nimbler and consistent across properties and reduce the time necessary to get programs approved or updated. Although some owners may elect to keep programs at a site level as they test the program or narrow the focus of resources and efforts, allowing flexibility to operate at an enterprise level while still connecting the work to the specific properties could be beneficial.

Best Practices Are Emerging Among Early Adopters of FSS in the Multifamily Sector

In the few years since multifamily providers have been able to operate individual FSS programs, a set of early adopters have launched programs and gained valuable experiences that can inform the work of other organizations. Although they were not initially eligible for HUD funding to offset program costs, the early adopters submitted an FSS action plan to HUD for approval and committed to following all the program rules and requirements. This commitment allowed the early adopters to enroll residents, provide a discretionary array of services directly or through referral, enable residents to escrow funds, enable residents to make interim withdrawals from escrow accounts, and disperse accumulated balances when participants meet graduation requirements. Likewise, when PHAs implement the FSS program, program participants must

[4] Portability rules for public housing agencies were described in Notice PIH 2016-08, issued May 6, 2016, and further clarified in the FSS Final Rule issued in 2022.

commit to achieving two mandatory goals to graduate: to secure "suitable employment" and be free of any cash welfare assistance, such as the Temporary Assistance for Needy Families program.

Beyond these requirements, organizations have flexibility and discretion in many facets of program administration, such as what services to offer, how they are delivered, and who delivers them. Although each program may have distinct characteristics, the programs share a series of processes and related activities, which shape how participants experience the program. As part of this research, the authors interviewed five participating housing organizations from the first wave of multifamily FSS programs. These early adopters' accumulated experiences offer insight into best practices for implementation strategies and program administration. If replicated, these practices can help more multifamily organizations increase their engagement with the FSS program and—if widely adopted—lead to better resident outcomes across the sector.

Outreach, Enrollment, and Participation

The ultimate success of recruitment and outreach efforts is reflected in the percentage of eligible households that enroll in the FSS program, which can be affected by site-specific characteristics and staffing levels. In the interviews, multifamily groups administering FSS programs reported enrollment rates that ranged from 10 to 25 percent, a significantly higher proportion of participation than what PHA programs have traditionally experienced (Lubell and Thomas, 2019).

Revised program rules now allow for the enrollment of household members who are not the primary head of household. These revisions open the program to more participants but also add some complexity. Staff must work with the household to confirm which member is signing the contract of participation (COP) and verify that the family is aware that escrow funds can be distributed only to the head of the FSS family, even if they are derived from the earnings of another family member. Explaining the program to potential participants is not a simple task, and residents must be convinced that it is worthwhile. During outreach and promotion, staff must describe how the program works and its potential benefits, yet the deal of diverted rents into escrow accounts, which can eventually be the participants', can sound abstract and "too good to be true." The task is more challenging due to language barriers and the complexity of program rules and requirements, such as how money is escrowed, when participants can access it, and what is needed to graduate.

For these reasons, staff responsible for enrollment describe the importance of sustained and multifaceted outreach, where they can highlight the FSS program opportunity in a variety of ways, such as through mailers, handouts, and testimonials, and different settings, such as at meetings, income recertifications, and community events. They employ differentiated outreach strategies to appeal to diverse types of residents who might participate in the program. These strategies include using different staff members as vehicles to share information. Staff members may include the resident services staff, property managers, or another trusted staff member who may interact with residents more frequently. As one senior manager puts it, "We try everything, but I believe that in-person engagement is best."

Some multifamily housing organizations have found that an effective strategy is to have resident ambassadors who have already enrolled or graduated from the program share their experiences.

These ambassadors offer salient examples to prospective participants and explain how the program works in practice. Organizations have learned that deep resident engagement must be a central activity for effective FSS programs, which takes time but leads to better program outcomes. Before the coronavirus pandemic, most resident engagements were performed in person and face-to-face. The pandemic has served as the impetus for more experimentation and demonstrated the viability of remote and virtual engagement.

Other effective strategies include engaging with resident leaders. Many organizations have a resident council or similar organization that can be used to raise issues related to residency and program participation. For example, when Mercy Housing was considering how to launch its FSS program, it convened a group of interested residents to help shape it. Together, the staff and residents changed the program's name to GAIN (Growth, Ambition, Inspiration, and Nurture). "With residents' input, the program has been designed to include an intensive process of self-reflection, a focus on financial education, and to ensure that each participant has access to the technology needed to work with a financial coach virtually. A series of onsite financial workshops have been organized to help establish financial skills, confidence, aspirations, and practices that are designed to support financial well-being. Each GAIN participant can work directly with the program coordinator, who is a Mercy Housing staff member, to advance their self-sufficiency goals."

The FSS program rules require housing providers to establish and work with program coordinating committees (PCCs) that include residents. For multifamily groups, this is an opportunity to ensure that the participants' perspectives can inform the delivery of the program. Although FSS programs have flexibility in comprising this group, program administrators believe that having this type of resident council is a best practice. Staff described how these committees provide a means to learn about participant priorities, promote resident "buy-in" to the program, and help identify resident leaders who can serve as next-generation ambassadors for the program to support future outreach efforts. Managing these committees requires staff time and can impede scaling up the FSS program efficiently, especially for providers operating programs at multiple sites. An alternative practice might be to encourage resident engagement in these committees across diverse programs that a provider operates.

Support Services

A broad spectrum of resident services can be incorporated into FSS programs. Activities and support services that prepare residents to work and secure jobs that lead to increased earnings are valuable because they generate higher escrowed funds. These services include those that promote employment training, workforce development, and job placement. In addition, many families have barriers to work that can be navigated with targeted support services (e.g., childcare, transportation assistance, and drug treatment services) that multifamily housing organizations can either offer their residents or refer them to other providers in their community. Another set of activities focuses on assistance with managing household finances, with goals of improving credit and lowering debt, which have been linked to better financial outcomes. These services and activities are all permitted under the FSS program, and rules do not dictate a particular approach. Each organization can decide which resident services it features in its program. Even though programs have discretion in what services they offer, tailoring programs to meet the needs of their residents and doing so in a way that aligns with organizational goals is a best practice.

Within the FSS field, interest in a “financial coaching” model is generating positive results. This approach has been prioritized by Compass Working Capital (Compass), a leading convener of the emerging FSS field. Its approach emphasizes participant-driven interaction and goal setting, in which coaches help clients build financial capability, pay down high-interest debt, build savings, and improve their budgeting and credit scores, complementing the asset building that can occur through FSS escrow account accumulation. In addition, Compass serves as a third-party program administrator on behalf of housing providers, providing training and technical assistance to owners looking to set up new programs. The Compass model has generated positive results in both PHA and multifamily housing settings. An evaluation of Compass Working Capital FSS programs with several housing authorities in the Boston area found that participating households had an annual earned income that was $6,032 (23 percent) higher than the comparison group (Moulton, Freiman, and Lubell, 2021). Another study found that Compass FSS participants had larger improvements in their credit scores and experienced greater reductions in credit card and derogatory debt than a comparison set of households (Geyer et al., 2017). The expansion of FSS in the multifamily housing sector provides an opportunity to expand upon this model intervention.

One best practice frequently cited was the value of having skilled and dedicated staff responsible for program administration. These staff become the primary face of the program for residents. In general, the work of resident services is challenging, and effective staff must have a diverse skill set, including good people skills, high degrees of cultural competence, an understanding of issues faced by families with low incomes, and the ability to manage high caseloads. These skills are the ones that organizations seek out for their staff and the staff of third-party partners. Additional responsibilities for the FSS program involve outreach, enrollment, participation, and graduation activities. Staff must ensure that each resident completes a COP, identifies personal goals that can be incorporated into an Individual Training and Services Plan, and understands program rules and requirements. Through ongoing communication and engagement with residents, staff must find ways to build trust with residents and keep it.

Many of these responsibilities can be performed directly by resident services staff or outsourced to a third-party partner. Even though many examples of effective partnerships with third-party providers are animating the field, this work must be managed by organizational staff who have been trained in the specifics of the Family Self-Sufficiency program. If traditional resident services personnel do not have the necessary skills, then organizations must consider the value of bringing those skills in-house or identifying other capable partners. An inability to perform any associated tasks required in administering the FSS program can undermine successful program implementation.

Training resident services staff to administer individual FSS programs is an ongoing process and must be tailored to the specific characteristics of each FSS program. For example, programs that emphasize financial education or coaching must have staff or partners who can offer accurate and high-quality budget and financing information that can benefit participants. Staff working in programs that feature referrals must be informed about what services are available in the community, know how to access them, and have a good understanding of public assistance rules and requirements. Program administrators must also recognize what capacity and knowledge already exists, what skills must be built or acquired, and how best to coordinate. Staff training should match the program's model.

These realities underscore the importance of retaining qualified program delivery staff and contingency plans for turnover. Staff turnover is a first-order organizational challenge that was exacerbated by the pandemic. Issues of pay scale and the rigors of front-line work make retaining staff difficult. One organization reported that the 20-percent expected turnover of resident services staff increased to 50 percent because of the pandemic. This increased turnover meant that much more of their work was devoted to hiring and training than is typical. Because the FSS touches on multiple parts of an organization, staff turnover in any one area can undermine program launch and execution. For some, turnover in resident services led to a pause in plans to launch an FSS program.

Organizations with staff participating in an FSS technical assistance cohort were particularly disadvantaged when the trained staff left the organizations. For this reason, having an organizational plan for the contingency of staff departures is valuable so that information is shared, programs can operate with continuity, and a succession plan is in place for family case management. Succession plans also speak to the need for ongoing training.

Program Management and Administration

Launching an FSS program involves overseeing a multistep process that unfolds over time, and implementation is not linear. Unexpected delays may occur because of HUD processes, staffing turnover, or on-the-ground conditions at the property site. Many factors can influence—and complicate—program rollout and ongoing administration. Some factors are internal to an organization, some are related to requirements of participating in a federal program, and others, such as the COVID-19 pandemic, are unexpected and beyond anyone's control. Organizations must be flexible and able to make changes on the basis of their experience.

Administering an FSS program adds complexity and administrative costs for housing providers, underscoring the importance of "buy-in" from organizational leadership. Effectively implementing an FSS program is an organizational responsibility. This responsibility starts with the initial threshold question of whether to launch a program, includes how sites are selected, and extends to allocating the organizational resources necessary to provide services and manage escrow accounts.

Complying with HUD rules requires significant organizational effort. The housing provider must have a degree of comfort with pursuing a program that may initially benefit only a limited number of participating households compared to the total portfolio. Leadership should be involved in the site selection process, which can affect program administration and implementation. Selecting sites with a stable resident population has its advantages: good physical conditions (no big renovation projects that can disrupt normal operations), trust between residents and staff, and a set of existing services to build upon.

Although the administration of an FSS program can center around the resident services team, effective implementation requires organizational integration because key roles extend across the diverse functions of a housing provider. Property managers, who often have a physical and consistent onsite presence and regularly engage with residents, can play important roles in program implementation. When "kept in the loop" about the FSS program, property managers can support outreach and enrollment efforts. Successful programs among the housing organizations the authors interviewed have seen the engagement of property managers as a special factor in their success. Finance and accounting staff are needed to manage participant escrow accounts. This management includes keeping records related to income certification and rent paid, calculating the housing assistance payment, and reporting to HUD. Development staff can be helpful in promoting the program to outside stakeholders and philanthropic supporters, who can provide resources to augment ongoing administration. In fact, the early adopters of FSS programs leveraged this type of support before they were eligible for federal funding, and they continue to leverage HUD investment with other non-federal resources as they offer the program to more residents.

Because multifamily housing organizations have discretion in how they administer their FSS program, they should be deliberate about the structure they choose. Responsibilities for FSS program administration, resident engagement, service referrals, and service provision can be done in house or contracted out to partners. Although organizations have flexibility, they should choose an administrative structure deliberately to match their capabilities, prevailing organizational practice, and ability to oversee implementation. Finding capable third-party organizations to collaborate and partner with can be challenging; however, engaging with these groups may be key to success. Early adopters emphasized the importance of "fit" not only in the services they provide but also in having shared priorities for resident engagement. As one program manager at The Community Builders phrased it, "Our partners must not only reflect the communities where they work, both culturally and linguistically, but also have the ability to meet families where they are and take the time to build the necessary level of trust to keep them engaged."

One of the most significant challenges organizations face when launching an FSS program is managing FSS escrow accounts. Program rules require that these accounts be interest bearing, which entails further calculation and may necessitate an entirely different accounting system, depending on whether residents are FSS participants. Delays in the release of the next-generation HUD Tenant Rental Assistance Certification System (TRACS) management system, originally expected in 2020, have prevented property management software companies from integrating FSS features into their products. As a result, organizations must either develop workarounds within the system or perform this accounting step manually. As staff from POAH noted, "The need to manage escrow accounting and reporting offline, in Excel, and then submit it is a huge admin drain and should not be necessary." In addition, managing escrow requires more education and training for staff to oversee this process and comply with program requirements.

Diverse Multifamily Housing Groups Are Aiming for Scale

The multifamily affordable housing sector is diverse in the type of organizations in the field. Although nonprofit and for-profit providers may have different motivations, the FSS program's features attract a wide range of groups. Several early adopters are committing to scaling the program as a part of distinct organizational strategies, and their experiences to date reveal both the challenges and opportunities presented by the FSS program.

Preservation of Affordable Housing (POAH)

POAH is a national nonprofit housing organization with a mission to "preserve, create and sustain affordable, healthy homes that support economic security, racial equity and access to opportunity for all." Founded in 2001, they currently own and manage more than 120 properties, housing 13,000 families, operating in 11 states and the District of Columbia (POAH, 2022). POAH made an organizational commitment to embrace the FSS program and aspire to offer it to all its residents. POAH began operating the program in 2016, even before HUD coordinator funds were offered to multifamily housing groups. To fund this strategy, POAH allocated resources from its national budget to cover the initial costs of service delivery and administration.

For POAH, the FSS program is part of its organization-wide community impact initiative to support resident success, which is rooted in principles of trauma resiliency and built on a platform of stable housing to create opportunities for residents so they can eventually achieve financial independence and economic mobility. A team of community impact coordinators provides these services in properties across the states where POAH operates.

Once HUD issued a Notice of Funding Availability, POAH applied for support. To date, it has received 10 HUD FSS grants and intends to apply for more as additional funding opportunities are announced. All told, POAH has launched FSS Programs at 49 properties and graduated around 200 families, with about 500 currently enrolled. POAH has experienced frustration with HUD decisions to limit grant funding to the equivalent of one staff coordinator position—some of its programs are larger and would be otherwise poised to grow—and the requirement to submit applications for each property even when several are in proximity to each other and are functionally administered as one program.

Since POAH started offering FSS, participants across all its FSS Programs have escrowed more than $3.2 million. Sixty-one percent of current participants have escrow balances, and 97 percent of graduates did, totaling more than $1 million. At most of these sites, POAH opted for a third-party approach, often partnering with Compass to administer its FSS programs. Compass has pioneered a resident-centered financial coaching model for FSS that has generated strong results. POAH relies on Compass to provide services to its residents. At several sites, POAH partners with a Local Initiatives Support Corporation Opportunity Center, where residents can access a range of services delivered by different providers in the community. In all cases, POAH works closely with its lead service provider to align the program with its organizational goals. Central staff at POAH have a leadership role to ensure consistency across the organization's programs, including calculating and administering escrow accounts.

In reflecting on what has driven their enrollment and success with engaging residents in FSS programs, POAH pointed to the property-based nature of the program, which allows staff on site to work with residents at their homes and other residents to see the success their neighbors are having with the program. In addition, FSS participation is a priority for the whole POAH property team, so they are pushing engagement. Finally, they point to the quality and impact of their programs. "Working with our program partners, we run a good and impactful program, so residents can see that it is worth their time—it should be obvious that a high-quality program will drive participation."

WinnCompanies

WinnCompanies (Winn) is a large-scale, for-profit developer, owner, and manager of housing with a portfolio built across 50 years of almost 200 developments in 11 states and the District of Columbia that includes market-rate, mixed-income, and affordable housing. Its work in the field has revealed how stable residential communities depend upon positive household outcomes, especially for families starting with lower incomes. As a for-profit company, Winn views the FSS program as a tool for helping its tenants improve their financial profiles, which can stabilize a property and add value to the investments they own or manage. In 2023, Winn created Connected Communities, a nonprofit affiliate that can deliver support services to residents and position them to attract philanthropic funding. Together, Winn and Connected Communities have pursued a strategy of applying for HUD grants to launch FSS programs at their properties.

Winn and Connected Communities see the FSS program as a means to support subsidized housing residents in building "critical assets," which in turn helps stabilize the properties they own and manage. As the director of economic mobility at Connected Communities puts it, "We are seeing firsthand how, with the right opportunities, families are achieving financial empowerment and lasting improvements in their economic position."

To date, Connected Communities has been awarded 36 grants, which support programs at 40 sites. Although these programs have not been fully launched, the targeted caseload is around 815 participating households. At most of these sites, Connected Communities has contracted with Compass to provide FSS program services, which include participant recruitment and financial coaching. Winn and Connect Communities provide overall program oversight, which includes managing the HUD grants and centralized escrow accounts. An onsite community coordinator, employed and funded by the property, offers wraparound services for the residents. This model of distributed responsibilities has been effective because Compass has been able to engage with clients remotely and scale up to meet demand as the number of programs has increased. Winn also has an accessible staff contact with whom residents can meet.

Scaling Opportunities and Challenges

POAH and Winn are experienced housing providers committed to bringing the benefits of the FSS program to more residents. Even though they have different organizational structures—one is a nonprofit organization, and the other is a for-profit firm with a nonprofit subsidiary—they share many approaches to implementing the program. These approaches include partnering with Compass and implementing a model that provides financial coaching and emphasizes asset building. POAH and Winn have also assigned a senior staff member to oversee implementation across the organization and emphasize the importance of building trust through resident services staff. Another similarity is that they use central staff to administer FSS escrow accounts rather than relying on property-level managers, but both housing providers have a staff presence on site that can help explain the FSS program, build trust with residents, and encourage their engagement and participation in the program.

As POAH and Winn aspire to achieve scale, they will confront several common barriers. Many of the barriers are related to adhering to HUD procedural requirements. For example, HUD has limited the size of grant awards to the equivalent of one staff coordinator position for every program site. This limitation adversely affects programs that can potentially enroll more families. HUD also requires owners to prepare distinct FSS action plans for each property—even when organizations are in geographic proximity and will function as one program. HUD has opportunities to revise and streamline program procedures to more effectively promote groups aiming to take their FSS programs to scale.

Program Refinements and Policy Reforms to Support High-Quality Multifamily FSS Programs

The feedback from staff implementing FSS in the multifamily sector provides insights that can inform future policy reforms. The authors determined that the FSS program requires the support and engagement of a broad set of stakeholders, including policymakers in Congress and the executive branch, as well as the intermediary organizations committed to building the program's field. These stakeholders can pursue a set of proactive steps to support the multifamily sector in their efforts to implement an effective FSS program.

- ***Deliver stable and commensurate funding to achieve scale.***

Before organizations can commit to running an FSS program, they must identify the funding streams that will cover staffing costs. Congress has increased appropriations for the FSS program by 56 percent across the past 4 years, rising from $80 million in FY20 to $125 million in FY23. However, most of these increases fund existing PHA programs and cover their staffing costs rather than support new programs. HUD issued the first awards for multifamily FSS programs in January 2023. A significant increase in targeted appropriations is needed for the FSS program to scale and make good on the policy commitment to expand the program in the multifamily sector.

HUD issued renewal funding in 2023 for existing programs and awarded more than $6 million to support 70 new programs, 38 of which were multifamily projects deemed eligible and then selected through a lottery. In the future, HUD should avoid using a lottery of chance to determine awards. Although the case for using a lottery system is understandable, given the limited funding available, the current system limits HUD's ability to take a holistic view of funding awards to ensure effective funding distribution and where funding will have the greatest impact. If existing support is unavailable for all qualifying programs, a more sophisticated way to distinguish the quality of applicants is needed, including a consideration of program design and prospective services. If a lottery is unavoidable, HUD should provide greater transparency in the process. One approach would be to allocate a higher percentage of awards to new programs to allow the multifamily sector to catch up and gain experience in program administration more quickly.

A consortium of FSS stakeholders recommended a $175 million appropriation of funds for FY24. This level of funding would provide the resources for HUD to distribute additional awards to multifamily housing organizations ready to launch new programs. Funding these programs in the multifamily sector should be prioritized over expanding the FSS program among PHAs, who have had access to it since its inception.

- ***Eliminate the funding cap of one position per program site for "new" FSS programs.***

The initial competition for new FSS program funding restricted awards to the equivalent of only one administrative position. This provision—which caps the amount of funding accessible and the number of residents that can be served—will be a major impediment to scaling the FSS program in the multifamily sector. Given the suggested ratio of one funded staff position for the first 25 enrolled participants, this approach limits the program size in the first year. HUD funds PHA FSS programs at a ratio of two positions for the first 75 participants and 50 participants for every additional staff position. Funding levels and uncertainty are threshold questions when organizations consider launching an FSS program. Not all multifamily organizations with existing programs believe the current level of potential funding is worth the effort of engaging with HUD. Launching an FSS program requires a significant organizational commitment and the performance of many distinct functions, requiring more than one devoted staff position. As HUD continues to evolve the multifamily program, it should allow greater flexibility in determining funding. In like manner, a housing organization should have the flexibility to operate a larger program—across multiple sites—and request additional staff.

- ***Allow multifamily organizations to administer their FSS programs across multiple properties.***

Multifamily organizations should be able to define their programs as they see fit. Rather than requiring each multifamily property to administer a distinct FSS program, HUD should support multifamily organizations if they choose to operate an FSS program across properties. Applying for a separate grant for each property adds a significant level of work for applicants, and it needlessly discourages innovation and approaches that might be more effective for participants, such as delivering a unified program across scattered sites. In the most recent notice of funding, HUD allowed additional flexibility to organizations to include multiple properties in one application, which reflects a more streamlined application process. However, the current lottery system and caps on the number of positions funded undermine the value of a streamlined application. Organizations such as POAH and Winn have previously been frustrated by the requirements of applying for grants at sites that are distinct but near others. The organizations are forced to submit separate FSS action plans even if they are identical. When properties are in proximity or run by the same people, a single action plan and application process should be acceptable. However, changes in funding applications should be coupled with a change in funding strategy so that applicants can make their case for funding on the basis of what properties and how many people they can serve, and funding should not be capped.

- ***Ensure that FSS escrow account management is integrated into HUD's reporting systems.***

HUD provides a worksheet to facilitate the calculation of escrow balances. The expectation is that each organization keeps track of account balances and is responsible for periodically sharing account records with participants. POAH has created systems using an Excel spreadsheet and shared this approach with other interested groups. HUD has yet to release a long-delayed update for TRACS, which can account for the FSS program, and property management software providers (such as Yardi and Real Page) are waiting for this release before they incorporate any changes into their products. An update is necessary for organizations to better integrate escrow accounts into their financial management systems. HUD must finalize and release the TRACS update as soon as possible.

- ***Support resident services as an intrinsic component of housing assistance.***

Despite the growing recognition of the importance of resident services, a consistent and commensurate source of funding has yet to emerge. This underfunding leads to uneven provision, access, and quality of services. Resident services should be more fully integrated into the provision of housing assistance, and the FSS program offers a means to accomplish this objective. Congress can help by expanding the availability of resident services resources that can support recipients of federal housing assistance. HUD can help by facilitating partnerships with other federal funding sources that support resident services.

- ***Provide technical assistance and timely support to multifamily organizations.***

HUD must be an engaged and responsive partner dedicated to helping housing providers become more efficient in administering FSS programs and increasing their organizational return on investment. Providing technical assistance and other resources to promote the field will be essential to ensure that multifamily groups can launch and administer effective FSS programs. Compass created a valuable source for technical assistance to help the broader FSS program field coalesce, but it also has information specifically relevant for multifamily providers. The Compass FSS Link offers background information on its FSS programs, a discussion forum, specialized webinars, and other resources for program staff.

Technical assistance efforts should include not only information on compliance with program rules but also insights on best practices that can lead to programmatic success, including strategies to support participant enrollment, a positive client experience, program graduation, and good resident outcomes. This information is particularly relevant in cases in which FSS programs involve multiple organizations, such as a consortium of providers that would benefit from shared services or partnerships between housing authorities and private owners. The 2018 program amendments envisioned allowing multifamily owners to cooperate with local housing authorities to administer FSS programs, but technical assistance may be required to jumpstart these efforts.

Also, HUD should advance work on developing meaningful performance measures that can, in the future, distinguish high performers and strong applications. Current efforts include implementing the FSS Achievement Metrics (FAM) to evaluate PHA programs and assess program performance by considering three factors (earnings performance, graduation rate, and participation rate). Eventually, multifamily FSS programs will have FAM scores—at least 5 years after program launch. In the meantime, HUD can engage with multifamily stakeholders to identify additional measures of performance to incorporate into such a system to distinguish the performance of multifamily FSS programs.

HUD can also increase its responsiveness to the FSS multifamily sector by issuing timely and appropriate guidance to address operational issues associated with program launch and administration. HUD review and approval of action plans is performed at the regional level and has been inconsistent. Backlogs have developed in getting HUD approval of FSS action plans, and the staff turnover at HUD headquarters has created communication gaps. At a minimum, HUD headquarters must provide clear guidance to field offices so they are up to date on how the FSS program works. HUD should also consider more actively managing the action plan review process during these initial stages of FSS multifamily expansion to ensure efficiency and consistency. Ensuring that approvals and other administrative decisions are promptly made requires special attention. Delays in approving action plans and getting funding released can needlessly undermine the launch and functioning of new programs.

- ***Encourage FSS partnerships between PHAs and multifamily housing providers.***

Multifamily housing providers rely on a range of subsidy programs to make their rents affordable. Many providers use low-income housing tax credits, which provide capital subsidies for owners to build or preserve affordable housing; in exchange, owners set rents at affordable levels at the property. Other subsidies, such as tenant-based vouchers or project-based rental assistance, provide operating subsidies that make rent affordable for individual residents. Multifamily providers need to have a project-based contract with HUD to be eligible to run individual FSS programs. However, many owners provide housing for residents who benefit from housing subsidies provided by the local housing authority, and although the opportunity exists to provide these residents access to FSS programs, the way to best support them remains uncertain.[5]

The FSS program statute allows for partnerships between multifamily groups and housing authorities. Collaboration between providers should be encouraged and made as easy as possible. HUD should offer targeted technical assistance to operationalize these arrangements, including guidance on how to distribute core program responsibilities, such as calculating escrow balances and providing services.[6] These partnerships have the potential to reach more residents, but they have yet to take shape. HUD should offer targeted technical assistance to organizations interested in these partnerships, including regional consortiums of PBRA owners operating in geographic proximity or with organizational consistency, to partner together to build up a larger participant base and share the administrative costs. This assistance might add complexity but allow for greater participation of groups and their residents.

- ***Support the broader FSS field through research, knowledge sharing, and development for an ongoing learning agenda.***

Organizations in the multifamily housing sector are predisposed to learn from their colleagues and emulate what works. An emerging field of practice is taking shape and generating insights for the successful implementation of the FSS program that can be shared widely. Through knowledge sharing, FSS programs can be made more effective over time.

As more multifamily organizations launch programs, there is an opportunity to identify the conditions under which the program is most effective. This may be best pursued with a series of well-designed pilots and demonstration projects that analyze unique features and approaches to program implementation that support higher earnings, increases in skills, and other measures of success. These projects–and their subsequent evaluation–could support the growing field of practice in both PHA and multifamily FSS programs.

[5] Local PHAs administer tenant-based housing vouchers (also called HCVs, or Section 8 vouchers), which are used in the private housing market. Some owners of multifamily properties have contracts with HUD to provide PBRA and cannot accept housing vouchers at these properties. At affordable housing properties that benefit from the low-income housing tax credit, assisted families can use vouchers, which would then qualify them as eligible to participate in an FSS program.

[6] Public notice issued by Public and Indian Housing on September 24, 2024 (PIH–2024–33 and PIH–2024–32).

For example, researchers have more to learn about the impact of interim withdrawals, in which residents can strategically access a portion of their accrued escrow balances before graduation. Interim withdrawals are rare but are allowed by statute and may be valuable in helping families manage their finances. Also, technology that facilitates remote learning and virtual engagement can help lower program costs, reach more families, and address language barriers. Other topics for investigation include programmatic structures that promote resident engagement and greater scale, such as automatically enrolling residents in the FSS program as a matter of course but allowing them to opt out; this tactic was successfully piloted with the Cambridge Housing Authority and could dramatically increase engagement with the FSS program. The mission-driven multifamily sector is distinguished by its innovation and will be focused on maximizing the potential of the FSS program. HUD can play a supportive role by identifying a learning agenda, elevating best practices, and sharing insights across the field.

The Promise of an Emerging FSS Field of Practice

The FSS program has shown promise when implemented by capable housing authorities, but the issues and prevailing dynamics in mission-driven multifamily organizations are distinct in many ways that necessitate consideration and targeted support by HUD. Especially among the mission-driven affordable housing organizations that have embraced the FSS program, a commitment to augmenting the delivery of affordable housing with high-quality resident services is already prevailing. The FSS program offers a strategic focus for this integrated approach, and program strategies that combine financial coaching, resident engagement, and access to supportive services in the community are already showing promise. Moreover, the emergence of a set of best practices is helping to identify and replicate successful program models—as well as barriers to adoption and scale. With targeted attention, increased congressional appropriations, and support from HUD, policymakers, and other stakeholders, the multifamily housing field can continue to expand its capacity to implement the FSS program and more effectively assist its economic security and mobility goals. By encouraging innovation and exploring how best to promote and replicate promising approaches, a dynamic field of practice can take hold.

Leaders of the multifamily sector should continue to articulate the challenges and opportunities in administering high-quality FSS programs and serve as liaisons with HUD and other federal policymakers. These leaders can make the case for funding, program modifications, support, and policy analysis when and where appropriate. They can articulate the need for greater incorporation of resident services into the provision of affordable housing and aim to fund these services at scale.

The early adopters of the FSS program in the multifamily sector are trailblazers. They have been pioneering ways to connect housing stability and affordability with access to support services and financial incentives to achieve better outcomes, including increased employment, earnings, and savings. In the process, they are demonstrating more effective ways to deliver housing subsidies. If done right by aligning incentives to work and save and integrating asset-building and financial capability objectives, housing assistance can more effectively support families as they transition away from public assistance, pursue economic mobility, and free up resources for other families in need.

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