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Impacts of Repositioning on Community Supportive Services (CSS) Programs (as of June 2020)

This is a summary of public housing repositioning on CSS programs; this chart does not superseded statutes, regulations, or HUD Notices.

Program	Question	RAD PBV	RAD PBRA	PBV	Tenant-based Voucher
Family Self-Sufficiency (FSS)	Can residents continue to participate and benefit?	Yes. A RAD conversion to PBV does not impact the PHA's ability to continue serving participating residents.	Yes, with two options: (1) If PHA continues to serve other HCV and/or PH FSS participants, the new owner may execute a cooperative agreement with PHA to serve FSS participants affected by the RAD conversion to PBRA; or (2) The owner can establish an independent FSS program. [See notes at end.]	Yes. PH and HCV FSS combined in 2014 with PHAs running a global FSS program for both PH and HCV. PBV is under the HCV program, so PBV residents have always been eligible for FSS.	Yes. PH and HCV FSS combined in 2014 with PHAs running a global FSS program for their both PH and HCV.
	Can the PHA retain grant funds to serve these residents?	Yes. PHA retains current grant and can request renewal funding.	Depends. Under the first option, yes: PHA retains current grant with PBRA FSS participants counted in future grant requests. Under second option, no: The owner uses its residual receipts to hire coordinators. Section 306 of Economic Growth Act changed Section 23 of 1937 Act. Once implemented, PBRA owners may access FSS funds, depending appropriations with earliest funding tentatively in FY21.	Yes. PHA retains current grant and can request renewal funding.	Yes. PHA retains current grant and can request renewal funding.
Resident Opportunities and Self-Sufficiency (ROSS)	Can residents continue to participate and benefit?	Yes. PHA may continue serving those living at the target development (to the extent those services predominantly benefit the former PH residents) and/or participants who relocate to other PH or with a voucher through the end of the grant.	Yes. Same as RAD PBV.	No.	No.
	Can the PHA retain grant funds to serve these residents?	Yes. PHA retains current grant but may not request renewal funding for properties that have been converted.	Yes. Same as RAD PBV.	No.	No.

Program	Question	RAD PBV	RAD PBRA	PBV	Tenant-based Voucher
Jobs-Plus	Can residents continue to participate and benefit?	Yes. Enrolled residents in the rent incentive prior to conversion may continue JPEID. Jobs Plus services can benefit former PH residents and those who lease at the JP site post-conversion, during the grant period, as long as the services predominantly benefit the former PH residents who resided at the target project at the time of RAD conversion. Benefits do not include Earned Income Disregard to tenants not participating in Jobs Plus at the time of conversion.	Yes. Same as RAD PBV.	No.	No.
	Can the PHA retain grant to serve these residents?	Yes. PHA retains current grant, but reviews future NOFAs for eligibility requirements. There is a NOFA provision that the grantee can finish the JP grant “unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary’s discretion, choose to end the Jobs Plus program at that project.” If a repositioning is being considered for a JP site, please consult with JP Grant Manager.	Yes. Same as RAD PBV.	No.	No.
Congregate Housing Services Program (CHSP)	Can residents continue to participate and benefit?	No.	Yes.	No.	No.
	Can the PHA retain grant to serve these residents?	No.	Yes. And the grant can be renewed.	No.	No.
Elderly/ Disabled Service Coordinator (EDSC)	Can residents continue to participate and benefit?	No.	No.	No.	No.
	Can PHA continue Operating Funds?	Yes. Provided the PHA continues to receive Operating Funds through the normal annual formula grant and uses these funds exclusively for PH residents.	Yes. Same as RAD PBV.	No. Operating Funds for EDSC can only be used for PH residents.	No. Operating Funds for EDSC can only be used for PH residents.
Neighborhood Networks (NN)		HUD is not funding new Neighborhood Network grants. If a PHA is repositioning a project that includes a computer center where the physical real property (e.g., build-out of computer room) and/or personal property (e.g., computers) were funded by a NN grant, the PHA can include the computer center in the repositioning (provided the computer center predominantly supports the RAD or other residents the project will serve). For instance, if a project is being converted under RAD or disposed under Section 18, PHA transfers the computer center to the new entity as part of real property transaction. The computer center is encumbered by a RAD or Section 18 use agreement, along with the other real property. Once the property is removed from public housing (DOT released), PH Funds cannot be used to modernize or operate (pay utilities) the computer center. However, if the center continues to serve PH residents, it may be possible to pay staffing costs proportional to the PH resident use.			

NOTE: For PBRA FSS, to ensure HAP payments are processed correctly, and until TRACS is modified, the Project Owner must notify MF_FSS@hud.gov there are current FSS participants residing in the Covered Project and adhere to the escrow and reporting requirements in Notice H 2016-08. The Project Owner may enter into a Cooperative Agreement with the PHA (the grantee), allowing the PHA to continue to provide service coordination to RAD-affected PBRA participants until all have completed their Contracts according to 24 CFR § 984.303. The Project Owner must assume responsibility for the administrative duties associated with FSS such as calculating and crediting escrow and reporting. Ultimately, the new Project Owner is responsible for serving the RAD-affected FSS participants until the end of their CoPs.