



July 23, 2018

The Honorable Pamela Hughes Patenaude  
Deputy Secretary  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, SW  
Washington, DC 20410

Dear Deputy Secretary Patenaude:

The undersigned organizations wish to express our concerns to HUD's proposed Performance Measurement System (System) for the Family Self-Sufficiency (FSS) Program, as published in Federal Register Notice (Vol. 82, No. 237, Docket No. FR-6046-N-01, December 12, 2017). HUD has proposed a System that unfairly evaluates the FSS programs of public housing authorities (PHAs) primarily on the increases in income that FSS participants achieve rather than other equally important established program objectives. ***We respectfully request that you implement a fair and balanced performance measurement system that evenly considers all FSS program objectives that contribute to the overall success of the FSS program.***

The proposed System devalues the importance of foundation building and places too much emphasis on quickly increasing participant income rather than the true mission of FSS coordinator work. Coordinators help families eliminate obstacles, build strong foundations, and ensure that they have the resources necessary to achieve intermediate and long-term goals for long-term success. It can take many years before a participant is ready to begin an educational or training program, much less gain meaningful employment that may lead to self-sufficiency.

Many public housing authorities have, as allowed under statute and program regulations, structured their programs with the emphasis on providing necessary social services as well as job and educational training, assisting many families to achieve their goals. Yet these very agencies may lose their FSS coordinator funding simply because they chose this approach rather than simply pushing participants to immediately obtain any employment available. If HUD implements this System, there is the potential that it will create significant turmoil for hundreds of participants, many of whom are extremely low-income, as well disrupt the FSS programs run by scores of agencies.

One of the more troubling aspects of this proposed system is that HUD will be retroactively implementing it, looking 3.5 to 7.5 years back, to calculate the success of FSS participants based on the limited measure of whether they increased income or not. It is patently unfair to hold PHAs to a retroactively imposed standard. It is also unfair to measure the success of participants and PHAs against increases in income but no other equally important performance standards.

HUD's proposed System also unfairly puts agencies in non-metropolitan and rural areas at a disadvantage because a lack of high paying jobs may not be as readily available as in metro areas. Further exacerbating the problem for these agencies is the fact that many participants may, as a matter of necessity, relocate to another area of

the state or outside of a jurisdiction to find higher paying employment. When this occurs, the initial agency receives no credit for the participant's success even though it encouraged FSS participation, supported the participant throughout the program, and encouraged movement to an area of opportunity where employment and even housing opportunities may be greater.

Lastly, in 2012, HUD commissioned a national evaluation of the FSS program, intended to provide evidence regarding the effectiveness of FSS programs in a diverse set of cities and local contexts. This evaluation, conducted by MDRC, will include analysis on the program's effect on a variety of participant outcomes, including employment, earnings, family income, benefit receipt, and other quality of life indicators. The results of the evaluation will be important in shedding light on how FSS programs should be evaluated.

***While HUD may be well-intentioned, we believe that the Department should implement a fair and balanced performance measurement system that evenly considers all FSS program objectives. We are available to meet with relevant HUD staff.***

We thank you for your consideration of this request.

Sincerely,

Public Housing Authority Directors Association  
Council of Large Public Housing Authorities  
National Association of Housing and Redevelopment Officials  
National Leased Housing Association  
Arbor Housing and Development (NeighborWorks Member)  
Grounded Solutions Network  
American Association of Service Coordinators

cc: Dominique Blom, Acting Assistant Secretary, Public and Indian Housing