

**Notice of Funding Availability for  
HUD's FY2016 and 2017 Comprehensive Housing Counseling Grant Program  
Frequently Asked Questions (Part 3)**

Question 1: In Rating Factor 1, (3) Measuring Client Satisfaction - it says to "Use Chart A1 or Chart A2 - Applicant Characteristics, to indicate if the Applicant and if applicable, its proposed Sub-grantees and/or Branches, measured customer satisfaction during the period October 1, 2013 through September 30, 2014." Is that supposed to say October 1, 2014 through September 30, 2015 instead?

Answer 1: The correct date range is October 1, 2014 through September 30, 2015. The corrected sentence (page 25 of the FYs 2016 and 2017 Housing Counseling Program NOFA) is "Use Chart A1 or Chart A2 – Applicant Characteristics (Tab 2 or Tab 3, as applicable), to indicate if the Applicant and if applicable, its proposed Sub-grantees and/or Branches, measured customer satisfaction during the period October 1, 2014 through September 30, 2015."

Question 2: What is the definition of a "Rural" area as used by HUD in the 2016 Comprehensive Housing Counseling NOFA? In addition, can HUD provide some guidance or direct agencies to a map that depicts rural areas?

Answer 2: We state on page 25 of the FYs 2016 and 2017 Comprehensive Housing Counseling NOFA that applicants must indicate if the applicant, or its sub-grantees or branches, if applicable, proposes to serve a rural area as defined by the USDA at 7 C.F.R. Section 3550.10. Maps that may help identify eligible rural areas can be accessed on the USDA's web site at <http://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do> by selecting "Single Family Housing" under "Property Eligibility Programs."

Question 3: Where can I find the most recent list of points of contact or authorized officials, or both, to send the Promise Zone and Preferred Sustainable Status Community forms?

Answer 3: The Promise Zone contacts can be found at this link:  
<https://www.hudexchange.info/resource/4396/promise-zones-certification-form-and-guidance/>.

The Preferred Sustainability Status points of contacts can be found at the following link:  
[http://portal.hud.gov/hudportal/documents/huddoc?id=PSS\\_POCs.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=PSS_POCs.pdf).

Question 4: I am writing for clarification concerning the completion of the 2016-2017 Housing Counseling Program NOFA Chart B, Services and Modes. When completing Column D of Chart B, is the online Home Buyer Education course provided through ehomeAmerica considered group education?

Answer 4: Web-based (online) education through a third party provider may be considered group education for purposes of completing the FY 2016-2017 Housing Counseling Program NOFA Chart B, Services and Modes, Column D. Copied below is a FAQ from the Office of Housing Counseling concerning the circumstances under which web-based education can be "claimed" by a participating housing counseling agency on HUD Form 9902. See <https://www.hudexchange.info/faqs/2498/would-a-housing-counseling-agency-be-allowed-to-bill-the-hud-grant-for/> for the full text of the FAQ.

For the purposes of reporting counseling services activity via form HUD-9902, internet education, including internet education provided through a third party provider, should be counted as education. For example, web-based homebuyer education should be recorded in section 6a of form HUD-9902. To claim the web-based education activity, the participating agency must be able to demonstrate that the client learned about and accessed the web-based education through the actions of the counseling agency, e.g., marketing and outreach of the availability of the web-based training by the agency.

Additionally, one of the following bullets must apply:

- The counseling agency created the web-based education system or program, or both;
- The counseling agency performs the instruction, and makes it available via a webcast, Skype or other similar online communication tool; or
- The counseling agency has entered into an agreement with a third-party provider of web-based education through which the agency can provide its clients access to the web-based education.

Question 5: The 18-month performance period under the FY 2016 and 2017 Housing Counseling Program NOFA (October 1, 2015 – March 31, 2017) overlaps with the 18-month performance period under the FY 2015 NOFA (October 1, 2014 – March 31, 2016). How are grantees to deal with this overlap period?

Answer 5: The 18-month performance period under the FY2016 and 2017 Housing Counseling Program NOFA was retained to allow grantees the maximum flexibility in utilizing grant funds. While some grantees may request retroactive reimbursements as far back as the start of the performance period, other grantees may choose to request reimbursement for activities that occur only after grant execution. Agencies should handle the separate grants through their accounting and management systems as they already handle other multiple funding sources for their programs. Agency systems must be able to distinguish the two grant funding sources in their systems, as well as distinguish HUD Housing Counseling Program NOFA grant funds from other sources, and attribute services appropriately so they aren't billing the same costs to more than one funding source.

Question 6: During the February 25, 2016 Housing Counseling Program NOFA webinar, the presenter said there was no narrative response necessary for Oversight Activities. However, the chart in the FYs 2016 -2017 Housing Counseling Program NOFA on page 23, states there should be a narrative response for Sub-factor 2b, Oversight Activities. Page 29 of the same NOFA, which elaborates on this Sub-factor, does not mention a narrative. Is there a narrative required for Oversight Activities? Please clarify.

Answer 6: A narrative is not required for Rating Factor 3, Sub-factor 2 Oversight Activities. Please complete the Oversight Activities Chart that applies to your agency. Rating Factor 3, Sub-Factor 2 of the chart on page 23 was not updated.