

**Notice of Funding Availability for
HUD's FY 2016 and 2017 Comprehensive Housing Counseling Grant Program
Frequently Asked Questions (Part 5)**

Question 1: I can view the information about the FY2016-2017 Housing Counseling NOFA on Grants.gov but I am not sure how to apply. Where do I find the instructions, charts, and other documents referenced in the NOFA? How do I attach the required forms to the application package?

Answer 1: Go to the "Package" tab and click on "Select Package" to view the instructions and application package. You may be asked to enter your email to be notified of updates. Click submit.

Download both the instructions and the application package by clicking the respective buttons.

By clicking the Download Instructions button, a WinZip folder containing the following files will open. These files must be downloaded, completed as instructed in the NOFA, and saved as documents on the Applicant's computer system.

1. Final signed FY16 General Section.pdf
2. 2995 PSS Cert.pdf
3. HUD 50153 Certification of Consistency with Promise Zone.docx
4. FY16 17 HC NOFA HUD 9906 Charts FINAL.xlsx
5. HUD 9902 Form.pdf
6. FY16 CHC NOFA final.pdf

By clicking the Download Package button, the Grant Application Package (PDF document) containing the required SF424 and Form 2880 will open. To open the Disclosure of Lobbying Activities form (SF-LLL), check the box and scroll through the Grant Application Package (PDF document) until you are at the SF-LLL, and fill in required information. To attach the forms from both the Download Instructions and Download Package tabs, check the box next to "Attachments" and scroll through the Grant Application Package (PDF) until you are at the "Attachments Form." Click the "Add Attachment" box to attach documents, charts and forms required for the application.

When the application is complete, you may click "Check Package for Errors" followed by "Save and Submit" when ready to submit the application.

For technical assistance, you may contact Grants.gov Customer Support. Grants.gov offers customer support 24 hours a day, seven days per week, except federal holidays. Customer support for applicants is available by telephone at 1-800-518-GRANTS (this is a toll-free number) or by email to support@grants.gov. Persons who are deaf or hard of hearing, or who

have speech disabilities, may contact customer support through the Federal Relay Service's teletype service at 1-800-877-8339.

Question 2: Chart G for Oversight asks the number of agencies in our network as of 10/1/2015. With the release of this NOFA we have had 3 agencies tell us they are moving to another Intermediary. Should I included them in the number as of 10/1/15 even though they will not be included in the numbers for the questions in this chart, because they will not be submitting an application through us as their Intermediary, or should I just input the number we currently have now and are submitting for this NOFA?

Answer 2: Chart G.1, row 10, states "Enter total number of affiliates/sub-grantees/branches in the Applicant's FY 2016 network as of 10/1/2015." Applicants should not include any affiliates/sub-grantees/branches that were in the Applicant's network as of 10/1/2015, but are currently not a part of the agency's network.

Question 3: I cannot locate the Promise Zone website. Where can I find the Point of Contact (POC) for Promise Zones so my organization can fill out the HUD 50153? Is there a new link to the website?

Answer 3: The Promise Zone website was updated after the FY2016 General Section NOFA and the FY2016-2017 Housing Counseling Program NOFA were published. The current link to contact information is as follows:

<https://www.hudexchange.info/programs/promise-zones/designee-contact-information/>

There were two rounds of Promise Zones (2014 and 2015), so there are two lists available at this link.

Additional information pertaining to Promise Zone certification may be found at this link:

http://portal.hud.gov/hudportal/documents/huddoc?id=PZ_Certification_Guidance.pdf

Question 4: On the SF-424 signature page, can I rescan this application in PDF format and upload to grants.gov to include the Executive Director's signature, or is there some electronic method of signing her name to this fillable PDF?

Answer 4: The SF-424 cannot be signed and then scanned and uploaded in PDF format to Grants.gov. As indicated in the signature box of the SF-424, the signature will be completed by Grants.gov upon submission. Please note that the SF-424 is to be signed by the Authorized Organization Representative (AOR), the person authorized by the E-Biz point of contact in

System for Award Management to submit applications on behalf of the organization. Individuals who plan to submit grant applications on behalf of an organization must register at Grants.gov, and be the Authorized Organization Representative (AOR) in SAM in order to submit an application.

Question 5: Chart G - Oversight Activities (iv) refers to HUD Handbook 7610.1, Paragraph 3-5 for requirements of conducting supervisory monitoring of counseling service activities. There is no paragraph 3-5 (as far as I can tell). There is a Section 3-5 under Counseling, but no mention of this oversight activity. Can you tell me if this means that someone sits in on my counseling session in a supervisory capacity? I am the only housing counselor.

Answer 5: The oversight activity in Chart G.2, row iv, is described as “Conduct supervisory monitoring of counseling service activities to ensure Delivery of Services requirements outline in HUD Handbook 7610.1, Paragraph 3-5 are met.” Chapter 3 of HUD Handbook 7610.1 is called “Delivery of Housing Counseling Services.” Paragraph 3-5 (on pages 21-23 of HUD Handbook 7610.1) is called “Counseling Services.” The oversight activity referenced in Chart G.2, row iv, is any supervisory monitoring that ensures that the requirements of paragraph 3-5 (counseling services that a client must receive) are met.

Question 6: On page 1 of the grant “download package,” the “HUD Applicant-Recipient Disclosure Report” is listed as Mandatory. So, when I clicked that, it took me down to page 6. When I completed that page (p. 6), I clicked the “Save” button on page 1, and I got an “Error” message. I did it three times, and kept getting the Error message. The only thing I did not fill in is the field that asks for “Amount of HUD Assistance Requested/Received: \$.” I did not fill in an amount because the instructions tell us not to fill in an amount -- or, if we do provide an amount, that becomes a cap. Other than that line, I see no potential problem, so thought you might be able to spot what I am doing that keeps giving me the Error message.

Answer 6: On line 4 “Amount of HUD Assistance Requested/Received” of the Form HUD-2880 Applicant/Recipient Disclosure/Update Report, Applicants may enter \$1.00. The amount entered on this line will not be used by HUD as a cap in establishing the maximum grant amount for the Applicant. (It is on Chart E1 or E2 that Applicants may indicate, but are not required to, a maximum grant request. This amount, if provided, will also be considered in the funding methodology as a cap in establishing the maximum grant amount for that Applicant.) Please note that regardless of the amount listed in line 4, Applicants that have received or expect to receive HUD assistance for housing counseling in excess of \$200,000 during fiscal year 2016 must select “yes” under the second question in “Part I Threshold Determinations,” and complete the remainder of the form. If an Applicant enters \$1.00 on line 4 and still receives an error message when trying to save the form, the Applicant should contact Grants.gov Customer

Support for assistance. Grants.gov offers customer support 24 hours a day, seven days per week, except federal holidays. Customer support for applicants is available by telephone at 1-800-518-GRANTS (this is a toll-free number) or by email (customer support). Persons who are deaf or hard of hearing, or who have speech disabilities, may contact customer support through the Federal Relay Service's teletype service at 1-800-877-8339.

Question 7: An LHCA would like to receive sub-grant funds from a SHFA; however, the LHCA received direct funding for their Housing Counseling Program until December 31, 2015. The SHFA has decided that billable activity for sub-grantees will start July 1, 2016.

However, since the period of performance for the LHCA's prior grant was 10/1/2014 – 3/31/2016, is this considered overlap, thereby making this LHCA ineligible to receive sub-grants through the SHFA?

Answer 7: An agency is not prohibited from utilizing HUD housing counseling grant funds from more than one NOFA and may receive funding from the SHFA for FY16 even though it has not spent all 2015 funds. Regardless of the start date for billable activity, 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 NOFA grant funding from other sources, and attribute services appropriately so they aren't billing the same costs to more than one funding source.

The limits are that applicants and Sub-grantees are prohibited from applying for or accessing FY2016 NOFA grant funding from multiple sources under the same NOFA (i.e., no double dipping). For example, applying for funding under this NOFA as both a direct Grantee (e.g. LHCA) and as a Sub-grantee of an Intermediary or SHFA is prohibited. Likewise, applying for funding under this NOFA as a Sub-grantee of two different Intermediaries, or a Sub-grantee of an Intermediary and SHFA is prohibited.

Question 8: The waiver to allow housing counseling agencies to charge clients to NFMC and charge additional salary time above the \$150/\$300 reimbursement amount to HUD expires in September of 2016 and appears to be limited to grant year 2015. The 2016-2017 NOFA is silent on the prohibition of charging clients to NFMC and HUD. Is it allowable for housing counseling agencies to charge the same client to NFMC and bill HUD for any additional counseling under the current NOFA?

Answer 8: HUD is no longer prohibiting the use of HUD Housing Counseling Program grant funds in conjunction with National Foreclosure Mitigation Counseling (NFMC) Program

funds. The FY 2014-2015 NOFA included a funding restriction that prohibited grantees and sub-grantees from using HUD Housing Counseling grant funds provided under the NOFA to reimburse housing counseling activity costs for which the specific grantee or sub-grantee received NFMC reimbursements. HUD waived this restriction for FY 2015. For the FY 2016-2017 NOFA, this restriction has been eliminated.

Correction to previously published “Part 3 FAQs: FY 2016-2017 Comprehensive Housing Counseling Grant Program NOFA”: We incorrectly stated in Question 4 of Part 3 of the FAQs that web-based homebuyer education should be reported in Section 6a of the form 9902. The correct section for reporting web-based homebuyer education is in section 8 of the form 9902. Please see below for revised answer to this question.

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?

Revised 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 through 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 8** 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 must apply:

1. The counseling agency created the web-based education system or program, or both;
2. The counseling agency performs the instruction, and makes it available via a webcast, Skype or other similar online communication tool; or
3. 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.