



# Notice of Funding Availability for HUD's FY 2014-2015 Comprehensive Housing Counseling Grant Program 3/24/2014

## More Frequently Asked Questions Part 2

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**Question:** A question came up whether my agency has a certification for HUD 2995, Certification of Consistency with Sustainable Communities Planning and Implementation. This would have been done in 2010 or early 2011. Can HUD direct me to the appropriate HUD person to determine this?

**Answer:** The Form HUD-2995, Certificate of Consistency with Sustainable Communities Planning and Implementation, certifies that the proposed activities/projects in this specific FY2014 – FY2015 Comprehensive Housing Counseling Grant Program application meet the criteria for Preferred Sustainable Communities bonus points. To be eligible to receive bonus points, an Applicant is required to obtain a certification from the designated Point of Contact for designated Preferred Sustainability Status Community or the Regional Administrator using Form HUD -2995, which verifies that the Applicant has met the required criteria. If you do not have a copy of the certificate that was previously obtained, you must obtain a new certificate from the appropriate point of contact. Designated points of contact can be found on [HUD's website](#)

**Question:** The only difference between the FY 14 NOFA HUD 2995 form and the FY13 NOFA HUD 2995 form is the change in the expiration from 2011 to 2015. All the other date references on the two forms remain the same. Using the new form to acquire the same information submitted during the FY 13 grant application will not provide any new information for the application process. Considering the difficulties associated with

obtaining these certifications, we recommend that HUD Office of Housing Counseling Program accept the certificates that were submitted with the FY 13 NOFA application for agencies that have already submitted these forms.

**Answer:** For this year's NOFA you are not required to obtain a new Certificate from the Preferred Sustainable Communities designated point of contact. You can re-submit the certificate submitted with your FY 2013 NOFA Application.

**Question:** On page 26 of the NOFA, section 2 (c), applicants with sub-grantees are asked to describe at least one activity that addresses an impediment to fair housing choice in at least three "**distinct service areas**". Should these service areas be among those described on the 9902, or within the sub-grantees' jurisdictions?

**Answer:** The services should be provided in the areas covered by the sub-grantees, and if the parent also provides counseling as part of this NOFA, the parent's areas cover as well.

**Question:** During the Housing Counseling NOFA Application webinar on March 11, 2014, the presenter told us to delete the Example Charts from the HUD 9906 charts prior to submitting them with our grant application. I have tried to delete the Example Chart B, but I get a message stating that the cells are locked and cannot be deleted or cleared. Should I just leave them and submit the entire workbook?

**Answer:** That instruction was in error, and you are correct that the "examples" cannot be deleted from the chart. You should submit the chart with examples as we have presented them. We apologize for the confusion.

**Question:** I am with a SHFA. We have 2 agencies that want to add branches to their approval so that they can be included as funded branches in our FY 2014 NOFA Application. These branches are long standing but do not currently appear on the HUD website and have never gotten their own HUD Housing Counseling System (HCS) ID. Can these Branches be included in our list of Branches on Chart A.2.?

**Answer:** The branches can be included in the list of branches proposed for funding on Chart A.2. If, prior to the FY 2014 NOFA issue date, the branches met the requirements for a Branch Office found in the definitions section of this NOFA. Specifically, the Branch must be in good standing under the laws of the state where it proposes to provide housing counseling services and be open to provide housing counseling services to a minimum of thirty (30) clients per year. In the case of an LHCA, MSO or an Intermediary with its own branches, the Branch Office must have been approved by HUD and have received an HCS ID prior to the NOFA issue date. In the case of a Branch Office of an organization that is not directly HUD-approved, it must be determined by the Intermediary or SHFA that the Branch Office of their sub-grantee met the definition of a Branch prior to the NOFA issue date. This type of Branch Office will be assigned an HCS ID once the Intermediary or SHFA is approved for funding and

confirms that the particular Branch Office will be funded from the Intermediary or SHFA's FY2014 grant.

**Question:** This is our first application for HUD grant funding, and we have many questions. Could you please recommend any resources we should look at, or contact to help a first time applicant through the hurdles of this application process?

**Answer:** The Office of Housing Counseling hosted a Webinar Overview of the FY14-FY15 Housing Counseling NOFA on March 11, 2014 and an archival version is now available online. You can listen to the recording using the replay number 1 (800) 475-6701 and access code 320809. And you can view the archived PowerPoint presentation [here](#).

Additionally, a team of HUD's Office of Housing Counseling staff is working to answer questions about the NOFA in order to provide consistent written response to all questions. Please email your questions to [housing.counseling@hud.gov](mailto:housing.counseling@hud.gov). You will receive a response either directly or via a list of Frequently Asked Questions that will be posted on: [www.hud.gov/housingcounseling](http://www.hud.gov/housingcounseling)

**Question:** On NOFA Page 24, in Rating Factor 3, Sub-factor 1(b) Budget, there is a request for explanation of expenses that seem disproportionately high. Please provide more information on what HUD considers to be "disproportionately high." Is there a percentage of the budget above which HUD will consider an expense to be disproportionately high?

**Answer:** HUD does not have a specific percentage for considering a particular expense to be "disproportionately high." This request is intended to give applicants an opportunity to explain aspects of the budget that may not be apparent to HUD when reviewing the dollar amounts in each line item and evaluating components such as expenses for direct counseling service provision, the ratio of HUD grant funds to total budget and the cost per client.

**Question:** The accompanying charts are password protected, which makes it difficult to expand the tables to accept more information. Also, as an intermediary we need to send an edited version of the charts to sub-grantees to solicit information for the grant writing. Password-protected forms make it difficult to simplify these charts for our sub-grantees. We are a bit hesitant to share the original charts with our sub-grantees as it will create confusion and raise more questions from our sub-grantee since some of the fields and columns in the original charts are not meant for them. Any recommendations on working with these charts will be much appreciated.

**Answer:** HUD has password protected the charts to help ensure the charts submitted by applicants are in the format required by HUD.

In terms of expanding the charts to accept more information, intermediaries may add rows to the charts to accommodate additional sub-grantees or funded branches if

necessary. To do so, the applicant can right click on a row number and select “insert.” This will insert a new row above the selected row number. The column widths cannot be expanded. However, even if all of the information entered does not display in the cell, it will still be captured in Excel. Applicants can confirm this by selecting the cell and looking at the formula bar near the top of the screen, which will show all information included in the cell.

Intermediaries that want to send the charts to sub-grantees to collect information for the application have options for doing so:

1. Applicants can send the original, locked Excel charts to their sub-agencies with specific instructions on which parts to complete. This requires no modifications to the charts.
2. Applicants can delete tabs from the document if there are tabs they do not want their sub-grantees to complete. For example, an Intermediary may prefer that sub-grantees fill out Chart A1 so that the Intermediary can compile all the sub-grantee responses into the Intermediary’s Chart A2 and complete Columns F – I and Column W at the Intermediary level. To delete a tab, the applicant can right click on the tab name near the bottom of the screen and select “delete.”
3. Applicants can select the charts, copy and paste them into a new Excel document, and make whatever modifications they choose before sending them to sub-grantees.

Intermediaries may collect information from sub-grantees using whatever method they choose. However, intermediaries should use caution if they choose to modify the charts to do so. **All applicants MUST ensure that the charts submitted with the application are the original, locked Excel version downloaded from [www.grants.gov](http://www.grants.gov). Under no circumstances should an applicant submit a modified version of the charts or submit the charts in PDF or any document type other than Excel.** Doing so may limit HUD’s ability to evaluate the application.

**Question:** Please note, on Page 1 of the FY 14 NOFA document, the publication date for the General Section of the NOFA is incorrectly stated as April 7th, 2014.

**Answer:** You may be looking at the application deadline date, which is April 7<sup>th</sup>, 2014. The current NOFA available on [www.grants.gov](http://www.grants.gov) correctly states the General Section publication date as February 19, 2014.

**Question:** The 2014 NOFA indicates that HUD reserves the right to award both FY2014 and FY2015 funds on the basis of this single NOFA competition. Our organization is in the process of being approved as a Multi-State Organization (MSO). We are not yet approved and will be applying for 2014 HUD funding as a sub-grantee of a State Housing Finance Agency. If we are approved as an MSO in the coming months, will we have a chance to apply for 2015 funding if congress appropriates HUD Housing Counseling funding?

**Answer:** HUD cannot comment on the requirements of future Housing Counseling Program NOFAs. However, in section I.C.1 of the NOFA, HUD reserves the right to issue a supplemental or independent NOFA in FY 2015.

**Question:** If a sub-grantee has a Branch Office in another state and applies under an SHFA, will the SHFA fund the branch in the other state?

**Answer:** The SHFA has discretion on how it sub-allocates grant funds to its sub-grantees and their Branches. The answer would depend on how the SHFA chooses to sub-allocate its funds and whether or not the SHFA allows its grant funds to be used for Branches in another state.

**Question:** Please define “geographically isolated agency.”

**Answer:** As stated in Rating Factor 2, Sub factor 1(b), a geographically isolated counseling agency is an agency that is or will be the only agency, sub-grantee or Branch Office participating in HUD’s Housing Counseling Program that is physically located in the service area of the Applicant, sub-grantee or Branch office.

**Question:** Rating Factor 3, Sub-factor 2(a) requires Intermediaries, SHFAs and MSOs to indicate in Chart A.2, Column W the percentage of the proposed award the Applicant intends to sub-allocate to each sub-grantee and funded branch. It is very difficult to answer this as we don’t know how much we will be awarded. The more funds we are awarded, the higher the percentage that will be passed through. If we get a small award, then it will limit the amount we can pass through. Please explain how you expect this question to be answered.

**Answer:** Applicants may determine the percentage of the proposed award intended to be sub-allocated using whatever method they choose. For example, applicants may use the actual percentage of funds sub-allocated in a previous year as a basis to estimate the percentage to be sub-allocated under this grant.

**Question:** Do we list other leveraged (besides fee income) on the SF-424?

**Answer:** Yes, all leveraged funds listed in Chart D should be listed on the SF-424. See the instructions in Rating Factor 4 for information on leveraging resources that can be included in the application.

**Question:** Do you want separate LHCA (or sub grantee) charts submitted with an intermediary's charts or just consolidated into an intermediary's chart?

**Answer:** Intermediaries should not submit separate charts for each LHCA, sub-grantee and/or funded branch. Intermediaries should submit consolidated charts providing information about their network. Each Rating Factor provides specific instructions on where to provide information in each chart. Intermediaries should not complete any of the charts labeled “LHCA” – i.e. Chart A.1, Chart E.2, and Chart G.2.

**Question:** You stated in the presentation that applicants should not use Adobe version greater than 9.4. Grants.gov requires Adobe 11 for submission. What is your guidance concerning this conflict?

**Answer:** Please use one of the fully compatible versions of Adobe Reader listed in the following [compatibility table](#) from [www.grants.gov](http://www.grants.gov):

Adobe Professional Versions	Adobe Reader Version	Compatible	Broken Pipe Resolved	Vista Compatible	Mac Compatible
11 (XI)	11.0.2	Yes	Yes	Yes	Yes
10 (X)	10.0.1	Yes	Yes	Yes	Yes
	9.4	Yes	Yes	Yes	Yes
	9.2	Yes	Yes	Yes	Yes
	9.1	Yes	Yes	Yes	Yes
9.0	9.0	Yes	No	Yes	Yes
	8.1.7	Yes	Yes	Yes	No
	8.1.6	Yes	Yes	Yes	Yes
	8.1.5	Yes	Yes	Yes	Yes
	10.1.4	Yes	Yes	Yes	Yes
	8.1.4	Yes	Yes	Yes	Yes
	8.1.3	Yes	Yes	Yes	Yes
	9.3.2	Yes	Yes	Yes	Yes
	9.1.2	Yes	Yes	Yes	Yes
	8.1.2	Yes	No	Yes	Yes
	9.1.1	Yes	Yes	Yes	Yes
8.0*	8.1.1	Yes	No	Yes	Yes

Applicants experiencing any technical problems should contact grants.gov for assistance and document that interaction.

**Question:** Please explain whether an LHCA can simultaneously apply for funding directly from HUD AND apply as a sub-grantee under a HUD-Approved Intermediary. We believe that LHCAs will be more likely to consider affiliating with an intermediary if they can submit applications in both roles even if funding would only be provided to the agency in one of these roles.

**Answer:** In general, LHCAs are prohibited from applying for funding directly from HUD and as a sub-grantee under a HUD-Approved Intermediary. However, there are two specific exceptions to this “double dipping” prohibition. See pages 8 – 9 of the NOFA for detailed information about these exceptions.

**Question:** Is it possible to widen the cells on Columns X and AA of Chart A2 on the HUD 9906, the INT SHFA MSO Characteristics worksheet? These columns require

writing out internet links and organization names. Currently it is hard to enter this information clearly because the cells are so narrow, and the formatting is locked.

**Answer:** The column widths cannot be expanded. However, even if all of the information entered does not display in the cell, it will still be captured in Excel. Applicants can confirm this by selecting the cell and looking at the formula bar near the top of the screen, which will show all information included in the cell.

**Question:** How do I get the charts referenced in the NOFA?

**Answer:** The grant application download in [www.grants.gov](http://www.grants.gov) includes two sets of zip folders: one labeled "Download Application Instruction" and another labeled "Download Application Package." The charts are included in the zip folder labeled "Download Application Instruction" in an Excel document.

**Question:** Can you provide further explanation on what it means to provide housing counseling services in conjunction with other HUD programs? For example, does it count if we are aware of other HUD programs and refer clients to local agencies that offer these 'other HUD programs'?

**Answer:** The intent of Rating Factor 3, Sub factor 3(b) is to determine the extent to which an applicant's housing counseling services complemented the HUD programs listed in Chart C during the period October 1, 2012 to September 30, 2013 (FY13). Referring clients to local agencies that offer these HUD programs complements the programs, so agencies that did so during FY13 would be justified in indicating that they provided counseling in conjunction with the program in Chart C. For monitoring purposes, you should be able to document that the services were provided during FY13.

**Question:** Can you provide more instruction detail on what type of agencies should be listed in Chart A.2.a Sub Grantees' Branches? For example, we have a sub-grantee with 10 branch locations. I don't believe the sub-grantee in this example qualifies as a funded branch but this is a column on the chart and thereby confusing. Should the sub-grantee branches be listed here?

**Answer:** Applicants should include in Chart A.2.a all sub-grantees' branches that the applicant intends to fund through the NOFA application. All sub-grantee branches included in the chart must:

1. Be an organizational and subordinate unit of a sub-grantee, not separately incorporated or organized, included in the application; and
2. Be in good standing under the laws of the state where it proposes to provide housing counseling services; and
3. Not be a sub-grantee or affiliate; and
4. Be open to provide housing counseling services to a minimum of thirty (30) clients per year. Satellite offices that provide housing counseling services less than the required minimum of thirty (30) clients per year are not eligible for

funding under this NOFA and may not be included in applicants' application responses.

In your example, you should list any of the 10 sub-grantee branch locations that meet these criteria.

**Question:** Is the HCS number the same number as the agency id? I am listing not only our main office but also all of our funded branches, and it is unclear to me if they all have one HCS number or if I should list the agency id for each of the funded branches.

**Answer:** Yes, the HCS number and the Agency ID are the same. It is a 5-digit number that begins with an 8 and is displayed on the agency's HCS profile. You should list the HCS Number/ Agency ID for each of the funded branches.

**Question:** For LHCA's, Chart E.2 Column B, is this the total amounts actually paid for the period 10-1-12 to 9-30-13, or is it the amount that was budgeted? Obviously, these could be two different amounts (under or over budget) so I am unclear what figures must be entered.

**Answer:** The dollar amounts provided in Chart E.2 should reflect the actual costs to administer your agency's housing counseling program from October 1, 2012 to September 30, 2013.

**Question:** In terms of narratives, is there a requirement to provide narratives for all the rating factors outside the charts' requested narratives?

**Answer:** See the table on page 18 of the NOFA for a breakdown of the chart and narrative responses required for each Rating Factor and Sub-factor.

**Question:** In Chart C, when I put an "x" in field c17 (HUD-sponsored Housing Counseling-related research, must specify) or c18 (other: must specify), the formula does not include these in the total number. Were these meant to be included in the points?

**Answer:** The "HUD-Sponsored Housing Counseling-Related Research or Pilot Program" and "Other" fields are not automatically included in the total so that HUD may evaluate the responses before including them. If your agency provided counseling in conjunction with a "HUD-Sponsored Housing Counseling-Related Research or Pilot Program" or "Other" HUD program not listed in Chart C, please specify the program in Column B and enter an "X" and/or indicate the number of sub-grantees and branches in Columns C and D, as applicable.