



Notice of Funding Availability for HUD's FY2015 Supplemental Comprehensive Housing Counseling Grant Program

Frequently Asked Questions (Part 3) May 04, 2015

Question: If you are due to receive Round 9 National Foreclosure Mitigation Counseling (NFMC) Program funding for foreclosure counseling, can NFMC foreclosure counseling be one of your individual or group counseling activities under the FY 15 Supplemental NOFA?

Answer: Eligible activities under the FY 2015 Supplemental Comprehensive Housing Counseling NOFA include individual counseling and group education on resolving or preventing mortgage delinquency or default. These activities can be included in the proposed work plan required as part of an eligible applicant's FY 2015 Supplemental NOFA grant application whether or not the applicant has been awarded NFMC funding for the same type of housing counseling service. Note that under Rating Factor 4 of the Supplemental NOFA, NFMC funding will not be counted towards an applicant's total amount of leveraged funds. Past NOFAs 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. This funding restriction will not apply to the funding awarded to grantees and sub-grantees under the FY 2015 Supplemental Comprehensive Housing Counseling NOFA.

Question: We are an approved agency/SHFA that will be applying for this funding for the first time. What should we demonstrate to satisfy the past performance impact category? (Rating Factor 3, Sub factor 1- HUD will utilize 9902 Form).

Answer: Currently approved agencies that did not electronically submit to HUD a form HUD9902 for the period October 1, 2013 through September 30, 2014 must, as part of their FY 15 Supplemental NOFA application, submit a HUD-9902 for the period of October 1, 2013 – September 30, 2014 (see "Application Checklist" at NOFA pages 14 – 15). The Form HUD-9902 should reflect the total housing counseling activity of the Applicant and its network (if applicable) for FY 2014. See HUD Handbook 7610.1 for additional guidance on completing the HUD-9902 report.

Question: We are an approved agency/SHFA that will be applying for this funding for the first time. How can we complete Chart E for the period 10/1/13 – 9/30/14? (Rating Factor 3 (1B))

Answer: Chart E should include the Applicant's total housing counseling program budget, and, if applicable, the total housing counseling program budget for its Sub-grantees and Branches for the period October 1, 2013 – September 30, 2014, including all sources of funding (not just HUD funding). This budget should reflect the budget used to operate your housing counseling program during FY2014, regardless of whether or not HUD funding was received during that year, and must document the total housing counseling program budget that includes all activities and services shown on the Applicant's form HUD-9902 submitted to HUD with the grant application for the same time period.

Question: We were not funded by HUD's Housing Counseling program for during FY2014 year. The NOFA regularly refers back to the FY2014 funding history as a standard for points assigned to categories such as Performance, Impact, Budget and Amount to be awarded. While the Eligibility section specifically says that the agency cannot have received funding in FY 2014 to be eligible for funding under this supplemental NOFA, the points system is based on having this housing counseling history with HUD for this period of time. Could you please clarify this? If we did not have this HUD grant for 2014, will we be at all competitive given the considerable amount of points assigned to having this history?

Answer: Agencies that did not receive funding from a prior NOFA, including the FY2014-2015 Comprehensive Housing Counseling Program NOFA, are eligible to apply for funding from the FY2015 Supplemental NOFA. Rating Factor 3 addresses, in part, the quality and effectiveness of the Applicant's past housing counseling activities. In evaluating past history we look at both activity funded by a HUD grant and activity funded by other sources. Applications from applicants who did not receive FY 2014 grant funds under the FY 2014-2015 Comprehensive Housing Counseling Program can still be competitive under this FY2015 Supplemental NOFA.

Question: Our organization has only been a HUD-Approved Housing Counseling Agency for a short period of time. Therefore, we have not had any Performance Reviews. How will Rating Factor 1, Sub-factor 2 be scored given our situation? Additionally, Rating Factor 3, Sub-factor 1 is related to Past Performance. Will this item be scored based on our performance prior to being HUD-approved as documented on the HUD-9902 for the period October 1, 2013 through September 30, 2014 that we will submit with our application? Will we be docked points because we were not HUD approved at that time?

Answer: For Applicants that HUD did not conduct a performance review for the period October 1, 2013 – September 30, 2014, when scoring Rating Factor 1, Sub-factor 2, HUD may take into consideration findings and information available to HUD from other non-HUD auditing organizations as well as any relevant information available to HUD regarding frequency and responsiveness to complaints, responsiveness to findings and implementation of corrective action, grantee performance and reporting, and counseling activity reporting during the period.

In scoring Rating Factor 3, Sub-factor 1(a) Impact, HUD will evaluate the total number of education participants and housing counseling clients served by the Applicant during the period October 1, 2013 through September 30, 2014 using HUD-9902 data. For agencies that did not electronically submit to HUD a form HUD-9902 for this period (i.e. Applicants that received approval as a HUD housing counseling agency after September 30, 2014), HUD will evaluate impact using the HUD-9902 for the period October 1, 2013 - September 30, 2014 submitted as part of the NOFA application (see "Application Checklist" on NOFA pages 14 – 15).

Question: We are applying under the exception for organizations that are newly-approved intermediaries or MSO's. We received funding during FY 2014 as a subgrantee for another organization but were responsible for providing oversight activities for that organization. How do we complete Chart G for Rating Factor 3, Subfactor 1 (oversight activities). Or is it not applicable to us?

Answer: An organization in this situation should provide a brief narrative describing the oversight and quality control activities actually performed in its FY2014 work plan (whether that work plan was performed as a direct grantee or as a subgrantee of another organization), including if applicable how it determined that subgrantees who are not HUD-approved met or exceeded HUD Housing Counseling Program requirements. Additionally, the organization should complete Chart G for the oversight activities it actually performed in FY 2014 (whether they were performed as a direct grantee or as a subgrantee of another organization) and FY 2015 proposed activities for its proposed FY 2015 for its branches or subgrantees or both.