Notice of Funding Availability for HUD's FY2017 Supplemental Comprehensive Housing Counseling Grant Program

Frequently Asked Questions

Question 1: How do agencies funded in FY16 under the FY 2016-2017 NOFA express interest for FY17 funding under that NOFA?

Answer 1: Agencies that received direct funding under the FY 2016-2017 Comprehensive Housing Counseling Grant NOFA were contacted directly by HUD about the expression of interest process for FY17 funding in December 2016. FY17 awards under the FY 2016-2017 NOFA will be made subject to the availability of appropriated funds. For additional information on those awards, please go to the following link for the media release:

https://portal.hud.gov/hudportal/HUD?src=/press/press releases media advisories/2016/HUDNo 16-094.

Question 2: My agency received a FY16 HUD comprehensive housing counseling grant award and submitted an expression of interest stating that we are interested in FY17 comprehensive grant funding. We just received notice about the FY 2017 Supplemental Comprehensive Housing Counseling NOFA. Do we need to apply to the Supplemental NOFA to get funding for FY17? If not, will there be another grant application for agencies that received an FY16 grant, or is the expression of interest letter the extent of what needs to be submitted to be funded in FY17?

Answer 2: Agencies that were awarded FY16 funds through the FY 2016-2017 NOFA as a direct grant from HUD are not eligible for a direct grant from HUD under the FY 2017 Supplemental NOFA. Instead, agencies that were awarded a FY16 direct grant from HUD will be eligible to receive FY17 funds using the applications submitted under the FY 2016-2017 NOFA if they expressed interest and remain eligible. To be eligible for funding in FY17, such agencies do not need to complete a Supplemental NOFA application or submit any other application to HUD, provided that they have submitted an expression of interest.

Alternatively, local housing counseling agencies (LHCAs) that were awarded FY16 funds as a direct grant from HUD under the FY 2016-2017 NOFA may affiliate with an Intermediary or SHFA and access FY17 funding through that affiliation. However, agencies will not be allowed to access FY17 funding under both the FY 2016-2017 NOFA and FY17 Supplemental NOFA. Similarly, they cannot access funding under the FY 2016-2017 NOFA from multiple sources – in other words they cannot be directly funded by HUD and also as an affiliate of an intermediary or SHFA.

Question 3: Will housing counseling intermediaries that were funded through the FY 2016-2017 NOFA be able to make changes to their sub-grantee list for FY17?

Answer 3: Yes, intermediaries will be able to make changes to their sub-grantee list subject to HUD approval. After awards are made, HUD plans to issue an award letter that will request an updated subgrantee list and intermediaries may request changes at that time.

Question 4: If an agency received a sub-grant in FY16 but is leaving (or was removed from) its intermediary network for FY17, can that agency apply for direct FY17 funding through the Supplemental NOFA?

Answer 4: Agencies that received a sub-grant in FY16 are not eligible to receive direct FY17 funding through the Supplemental NOFA unless they have received HUD approval as a newly approved Multi-State Organization or Intermediary on or after February 18, 2016 and prior to publication of the Supplemental NOFA.

All other agencies that received a sub-grant in FY16 are not eligible to receive direct FY17 funding through the Supplemental NOFA. FY16 sub-grantees that leave or are removed from their intermediary network for FY17 may be able to affiliate with a different Intermediary or SHFA and access FY17 funding through that affiliation.

Question 5: Are non HUD-approved local housing counseling agencies eligible to apply for funding under the FY2017 Supplemental NOFA?

Answer 5: To be eligible for direct funding under this NOFA, an agency must be a Local Housing Counseling Agency (LHCA), Intermediary or Multi-State Organization (MSO) approved by HUD under *24* C.F.R. 214, subpart B, or be a State Housing Finance Agency (SHFA). Additional Eligibility Criteria are described in Section III of the NOFA. Agencies that do not wish to directly apply for funding under this NOFA may affiliate with a HUD-approved Intermediary or SFHA that has chosen to compete for funding under the NOFA. As an affiliate of an Intermediary or SHFA, an agency may receive counseling funds in the form of a sub-grant based on the parent agency's distribution policies.

All agencies, including affiliates and sub-grantees, are reminded that they are required to adhere to all HUD requirements including but not limited to 24 C.F.R. part 214 and HUD Handbook 7610.1 REV-5 for administration of their housing counseling program(s). Please go to this link below to view the Housing Counseling Handbook https://www.hudexchange.info/resource/4905/housing-counseling-handbook/.

Question 6: My organization is very interested in applying for grant funds for counseling. This will be our first application. How are the funds allocated and what types of counseling activities are covered by the grant funds)?

Answer 6: Please see "Section II. Award Information" of the FY2017 Supplemental NOFA for information on how the funds are allocated. Grantees and sub-grantees will be reimbursed only for the applicable activities outlined in "Section III.E.1. Eligible Activities" of the FY2017 Supplemental NOFA.

Question 7: The Local Housing Counseling Agency (LHCA) I work for received a HUD housing counseling grant in 2016. We just received the 2017 Supplemental NOFA and want to be clear on the intent of the NOFA.

- 1. Will we need to apply again if we received funding in 2016?
- 2. If we do not need to apply again for the 2017 funds, will we be funded at the same level as last year?
- 3. Could we potentially get additional funding if we apply again?

4. If my organization fails to apply for funding under the FY 2017 Supplemental NOFA, will it lose funding for which it is eligible under the FY 2016-2017 Comprehensive NOFA?

Answer 7:

1. Will we need to apply again if we received funding in 2016?

No. LHCAs that received FY16 funds as a direct grant from HUD are eligible to receive FY17 funds based on their applications for the FY 2016-2017 Comprehensive NOFA, provided that the LHCA expressed an interest in receiving FY17 funds and remains eligible to receive such funds. To be eligible to receive funding, such agencies do not need to complete a Supplemental NOFA application or submit any other application to HUD.

2. If we do not need to apply again for the FY17 funds, will we be funded at the same level as last year?

As described in Section (I)(A)(2)(b) of the FY 2016-2017 NOFA, should FY17 funding become available, HUD will rerun the FY16 funding formula, using FY16 application data/scores, for those FY16 grantees that remain eligible and expressed an interest in receiving FY17 funds. There is no guarantee that recipient of FY2016 funding under the FY 2016-2017 NOFA will be funded at the same level in FY17.

3. Could we potentially get additional funding if we apply again?

No. An LHCA that received FY16 funds as a direct grant from HUD will not receive additional funding under the FY17 Supplemental Housing Counseling NOFA, unless the agency received HUD approval as a newly approved MSO or Intermediary on or after February 18, 2016 and prior to publication of the FY17 Supplemental NOFA.

4. If my organization fails to apply for funding under the FY 2017 Supplemental NOFA, will it lose funding for which it is eligible under the FY 2016-2017 Comprehensive NOFA?

No.

Question 8: If my agency receives National Foreclosure Mitigation Counseling (NFMC) Program funding for foreclosure counseling, can NFMC foreclosure counseling be one of the individual or group counseling activities under the FY17 Supplemental NOFA?

Answer 8: Eligible activities under the FY17 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 FY17 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 FY17 Supplemental Comprehensive Housing Counseling NOFA.

Question 9: 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 9: Currently approved agencies that did not electronically submit to HUD a form HUD-9902 for the period October 1, 2015 through September 30, 2016 must, as part of their FY17 Supplemental NOFA application, submit a HUD-9902 for the period of October 1, 2015 - September 30, 2016 (see "Application Checklist" at NOFA Section IV(B)(2)(b)(5). The Form HUD-9902 should reflect the total housing counseling activity of the Applicant and its network (if applicable) for FY16.

Question 10: We are an approved agency/SHFA that will be applying for this funding for the first time. How can we complete HUD-9906 Chart E for the period 10/1/15 - 9/30/16? (Rating Factor 3, Sub-factor 1(b))

Answer 10: Chart E should include the Applicant's total housing counseling program expenses, and, if applicable, the total housing counseling program expenses for its Sub-grantees and Branches for the period October 1, 2015 - September 30, 2016, including all sources of funding (not just HUD funding). This chart should reflect the actual expenses used to operate your housing counseling program during FY16, regardless of whether or not HUD funding was received during that year, and must document the total housing counseling program expenses for all activities and services shown on the applicant's form HUD-9902 submitted to HUD for the same time period.

Question 11: For the purpose of the 2016 actual expenses portion of the application, do we state expenses for the entire 2016 fiscal year or just the period from June-September 30, 2016 when we were formally named "HUD-Approved"?

Answer 11: The actual expenses included on Chart E must be for the entire Fiscal Year 2016 (October 1, 2015 through September 30, 2016). Please note that pursuant to page 33 of the Supplemental NOFA "Applicants must document their total housing counseling program expenses that includes all of the activities and services shown on the Applicant's Form HUD-9902 submitted to the Department for the same time period." In other words, the time period of actual expenses included on Chart E must coincide with the time period of activity reported on the Form HUD-9902. This is also clarified in the HUD-9902 Desk Guide, which states, in part, that agencies, which received HUD-approval mid-way through the fiscal year, should include "all households served since the beginning of the applicable fiscal year" on their Form HUD-9902 submitted to HUD.