

FY 2018 Comprehensive Housing Counseling Grant Program NOFA

Frequently Asked Questions

Applicant Eligibility

Question (1)

Who is eligible to apply for this grant funding?

Answer (1)

All housing counseling agencies (including LHCAs, Intermediaries, and MSOs) approved by HUD to participate in the Housing Counseling Program prior to the NOFA issue date, along with State Housing Finance Agencies (SHFA), who meet the Eligibility requirements published in the NOFA, are eligible to apply. Housing counseling agencies that have not received HUD approval but meet the Housing Counseling Program approval criteria at 24 C.F.R. § 214.103 are encouraged to affiliate with a HUD-approved Intermediary or SHFA. For more information, please see *Section III (Eligibility Information)* of the Comprehensive Housing Counseling Grant Program NOFA.

Question (2)

What are the recordkeeping and reporting requirements associated with becoming a Comprehensive Housing Counseling Grant recipient?

Answer (2)

Housing Counseling Grant recipients are required to submit several reports to the Office of Housing Counseling over the course of the grant period. These reports include Quarterly Performance Reports, as well as quarterly electronic submission of the HUD-9902 report in the Housing Counseling System (HCS) online portal. Reporting and Recordkeeping are outlined in *Section III.E (3) Eligibility Information/Other Program and Grant Agreement Requirements and Obligations* and *Section VI.C Award Administration Information/Reporting* of the NOFA. A more detailed explanation of reporting requirements is outlined in the [Housing Counseling Webinar: FY 2016 Comprehensive Grant Agreement Training](#) archived webinar, and beginning on Slide 60. This is a helpful reference guide for potential new grantees, but please be aware that grantees awarded under the 2018 NOFA will be held to the requirements outlined in the 2018 Comprehensive Housing Counseling NOFA. Mandatory reporting requirements will be detailed in *Article XI, Reporting* of the recipients' 2018 Comprehensive Housing Counseling Grant Agreement.

Additionally, funding received under this NOFA is subject to all OMB Circulars and Government-wide regulations applicable to Federal financial assistance programs. Please see Grant Agreement, related FAQs, and [2 CFR Part 200](#) for further detail on requirements related to the grant recipients' use of federal funding. A reference for additional information on acceptable billing policies is the archived [Housing Counseling Webinar: Understanding Billing Methodologies and Best Practices](#).

Question (3)

Are non-HUD approved housing counseling agencies eligible to apply for funding under the Comprehensive Housing Counseling Grant Program NOFA?

Answer (3)

No. Housing Counseling agencies that have not received HUD approval but meet the Housing Counseling Program eligibility criteria set forth at 24 C.F.R. Part 214 are encouraged to affiliate with a HUD-approved Intermediary or SHFA. Individuals, foreign entities, and sole proprietorship organizations are not eligible to apply for or receive awards made under the Comprehensive Housing Counseling NOFA.

Question (4)

My organization doesn't currently administer a HUD housing counseling grant. However, we are interested in submitting a grant application. Is this NOFA open to new applicants or specifically for current grantees?

Answer (4)

Yes, the NOFA is open to new applicants and current grantees who meet the eligibility requirements of the NOFA, along with all applicable HUD requirements.

Question (5)

Must our agency's housing counselors be certified?

Answer (5)

At the time of the NOFA application the agency's housing counselors do not have to be certified. If the grant applicant is selected for the award all Housing counselors participating in the Housing Counseling Program must be certified by August 1, 2020. Agencies that already have at least one certified counselor will be able to indicate that on the NOFA application. Applicants should be aware that the housing counselors' training, testing, and certification expenses are eligible expenses under this NOFA.

General Questions

Question (6)

Can NOFA applications under the 2018 Comprehensive Housing Counseling Program be submitted by Applicants in the form of a paper copy, or must the application be submitted through the Grants.Gov online process?

Answer (6)

An electronic copy of the Application Package and Application Instructions for this NOFA can be downloaded from Grants.gov, [here](#). All applications must be submitted electronically via Grants.gov. An applicant demonstrating good cause may request a waiver from the requirement for electronic submission (for example, a lack of available Internet access in the geographic area in which the applicant's business offices are located). Applicants that cannot submit their applications electronically must submit a waiver request so that the request is received by HUD at least 15 days before the application deadline. If HUD waives the requirement, HUD must receive your paper application before the deadline of this NOFA. To request a waiver and receive a paper copy of the application materials, you should contact: housing.counseling@hud.gov.

Question (7)

How are the grant funds allocated?

Answer (7)

Please see *Section II (Award Information)* and *Section V (Application Review Information)* of the Comprehensive Housing Counseling Grant Program NOFA for information on how funds are allocated.

Question (8)

Will the Office of Housing Counseling offer a general training on the FY 2018 Comprehensive Housing Counseling Grant Program NOFA?

Answer (8)

Yes, the Office of Housing Counseling will provide a Comprehensive Housing Counseling Grant Program NOFA Webinar training, and it will be [archived on HUD Exchange](#) for those that miss the live webinar. The archive will provide the audio, PowerPoint presentation, and transcript of the training.

Question (9)

Does the use of grant funds cover all aspects of counseling (pre-purchase, post-purchase, foreclosure prevention)?

Answer (9)

Grantees and sub-grantees will be reimbursed only for the eligible activities outlined in *Section III.E.1 Eligible Activities* of the FY 2018 NOFA, and applicable grant agreement.

Question (10)

My organization was recently approved by HUD and this is our first time applying for grant funding under the Comprehensive Housing Counseling Grant Program NOFA. Are there any requirements unique to our situation?

Answer (10)

Yes. Applicants that received approval as a HUD housing counseling agency after September 30, 2017 would not have submitted a HUD-9902 Form covering the period October 1, 2016 through September 30, 2017. As such, these newly-approved applicant must include a HUD-9902 for the Period October 1, 2016 through September 30, 2017 with their NOFA application package. Applicants that were previously required to submit a HUD-9902 will be evaluated based on the data in HUD's Housing Counseling System. Please assure that you have also registered for a DUNS number. Applicants cannot file an application in grants.gov without an active DUNS number.

Question (11)

When will the grant funds be awarded and made available?

Answer (11)

Award dates are currently unavailable. However, we can provide the following information regarding use of grant funds. HUD will notify applicants of their status for funding. Applicants selected for the award will be asked to execute a grant agreement with HUD. Grantees will receive funding on a cost reimbursement basis for eligible housing counseling services. The initial period of performance for grants awarded under the NOFA will be for a period of up to twenty-four months. For planning purposes, applicants should assume that the period of performance is October 1, 2017 through September 30, 2019.

Question (12)

The 24-month performance period under the FY 2018 Comprehensive Housing Counseling Grant Program NOFA (October 1, 2017 – September 30, 2019) overlaps with the 18-month performance period under the FY 2017 NOFA (October 1, 2016 – March 31, 2018). How are grantees to deal with this overlap period?

Answer (12)

The 18-month performance period under the FY2016-17 Comprehensive Housing Counseling Grant Program NOFA was increased to 24 months in the FY 2018 NOFA to allow FY2018 grantees the maximum flexibility in utilizing grant funds. While some grantees may request retroactive reimbursements as far back as the start of the FY2018 performance period, other grantees may choose to request reimbursement for activities that occur only after FY2018 grant execution.

Agencies should handle the separate grants through their accounting and management systems in a similar manner as they would when managing multiple funding sources. The agencies' financial management systems must be capable of distinguishing between the two HUD Housing Counseling grant funds, as well as funds from other sources, and attribute services appropriately so that the same cost is not being billed to more than one funding source.

Question (13)

Are home visits regarded as an alternate mode of counseling?

Answer (13)

Yes, counseling that takes place in a client's home is an example of an alternate mode of counseling.

Question (14)

Is there any way for an applicant to estimate their potential score for each of the Rating Factors?

Answer (14)

Applicants should review *Section V. A.: Application Review Information – Review Criteria* for a detailed listing of all Rating Factors, and the available points for each.

Please note that for a period of at least 120 days, beginning 30 days after the awards for a Program NOFA are publicly announced, HUD will provide to a requesting Applicant a debriefing related to its application. A request for a debriefing must be made in writing or by email by the authorized official whose signature appears on the SF424 or by his or her successor in office, and be submitted to housing.counseling@hud.gov.

Question (15)

How do we apply?

Answer (15)

Prospective applicants should review the Comprehensive Housing Counseling Grant Program NOFA before submitting a grant application. Organizations must submit applications online at Grants.gov. Individuals who plan to submit grant applications on behalf of an Organization must register at Grants.gov, and be listed as the Authorized Organization Representative (AOR) in SAM to submit a grant application. Grants.gov registration involves several steps and may take a few weeks to complete if any issues need to be resolved. Complete registration instructions and guidance are provided on the Grants.gov website.

Applicants must download both the Application Instructions and the Application Package from Grants.gov. Please verify that you are submitting your application for the correct funding opportunity as applications will only be considered for the competition indicated on the submission. Validated Grants.gov submissions will receive a confirmation of receipt and an application tracking number. If you do not receive a confirmation notice and application tracking number, your application has not been considered received by Grants.gov. Only completed applications received by Grants.gov on or before the deadline will be considered timely submissions eligible for consideration.

Question (16)

Where can I find instructions on how to download the grant application from Grants.gov, and submit required application materials?

Answer (16)

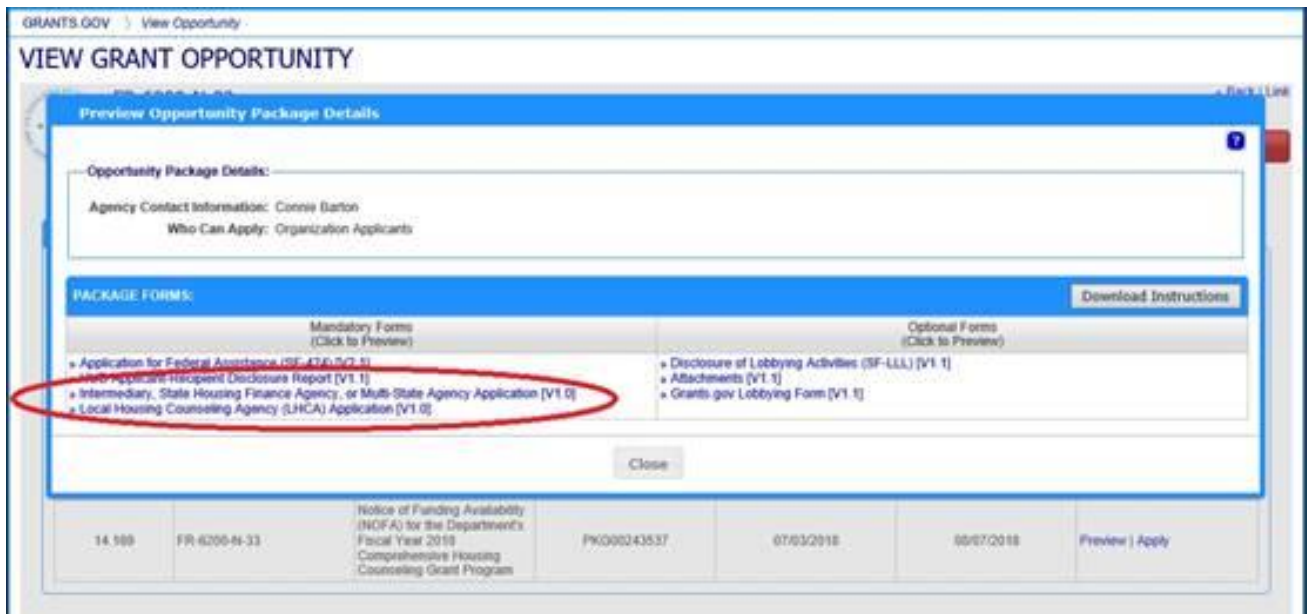
Please refer to *Section IV – Application and Submission Information*, of the 2018 Comprehensive Housing Counseling Grant Program NOFA for detailed information on how to download application materials from Grants.gov and submit required materials.

Question (17) * Updated July 12th, 2018

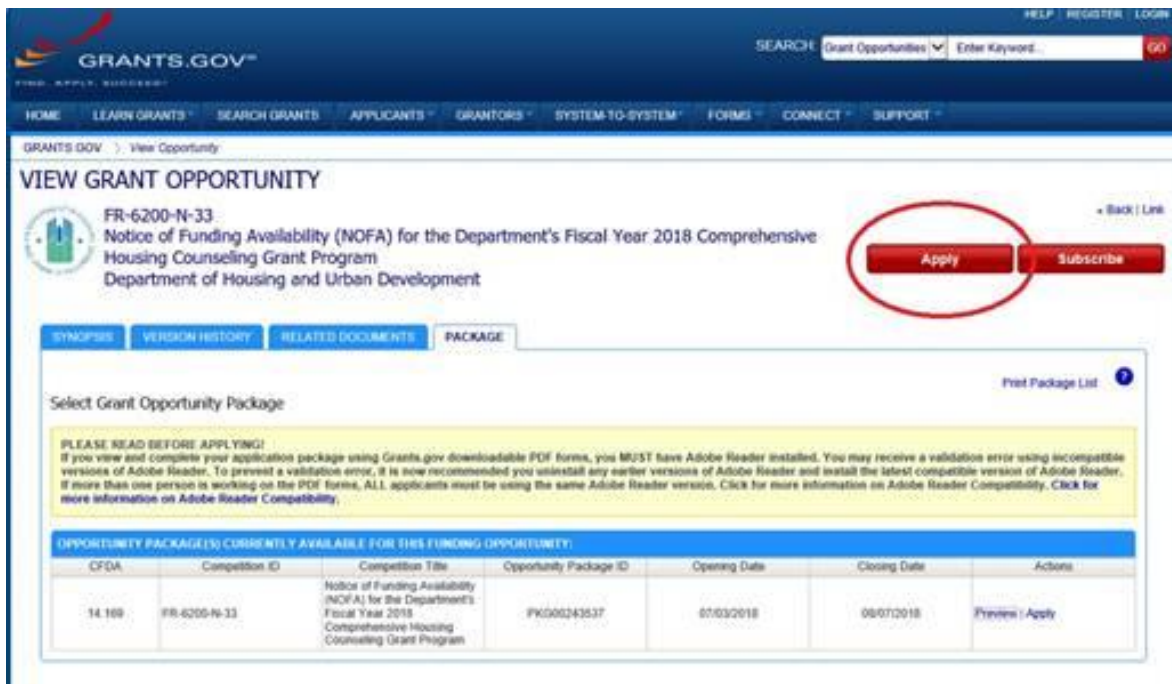
Q: When I download the NOFA Instructions .zip, I only see Chart A2 and Chart C2 excel spreadsheets of the HUD-9906 form. Where can I find all the HUD-9906 charts for my grant application?

Answer (17)

This year, the HUD-9906 Charts are PDFs. Intermediaries, SHFAs, and MSOs must complete the file entitled Intermediary, State Housing Finance Agency, or Multi-State Agency Application [V1.0]. LHCA's must file the file entitled Local Housing Counseling Agency (LHCA) Application [V1.0]. Applicants can see read-only versions of these charts by clicking the Preview button under the Package tab of the grant opportunity listing on grants.gov:



However, the fillable versions of the 9906 charts will only be available after a registered applicant has clicked the Apply button and begun the application:



The Chart A2 and Chart C2 excel spreadsheets found in the Instructions .zip file are supplements to the HUD-9906-P. Intermediaries, SHFAs, and MSOs will be prompted to attach their completed spreadsheets in their fillable HUD-9906-P.

Question (18)

I am having an issue with the Grants.gov system. Who can I contact for assistance?

Answer (18)

Grants.gov offers customer support 24 hours a day, seven days per week, except on Federal holidays. Applicants may call 1-800-518-GRANTS (toll-free) or send an 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.

Forms

Question (19)

On the SF-424, which box should I check for Question 2 where it asks about the Type of Application?

Answer (19)

Applicants should check "new" on Question 2 for "Type of Application" on the SF-424.

Question (20)

Is the form HUD-2880 Applicant/Recipient Disclosure/Update Report applicable to the Comprehensive Housing Counseling Comprehensive grant?

Answer (20)

Yes, it is required for entities applying for all HUD funding. Please see instructions for completing the form HUD-2880 [here](#).

Question (21)

Which box should I check: "Initial Report" or "Update Report" on the form HUD-2880 Applicant/Recipient Disclosure/Update Report?

Answer (21)

When applying for HUD assistance, check the box "Initial Report" on the form HUD-2880 Applicant/Recipient Disclosure/Update Report for HUD funding. After you receive the funds and if applicable, you check the box "Update Report" (filed by "Recipients" of HUD Funding). All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

Question (22)

There are several questions on the SF-424 and HUD-2880 that ask for a dollar amount. Can you please provide guidance on the dollar amounts that should be entered on these required forms?

Answer (22)

On the SF-424, line 18a Applicants should enter a response of \$1.00. Applicants may also indicate, but are not required to, the maximum grant request on Chart E1 or E2. This amount, if provided, will also be considered in the funding methodology as a cap in establishing the maximum grant amount for that Applicant.

On Form HUD-2880 Applicant/Recipient Disclosure/Update Report, line 4 "Amount of HUD Assistance Requested/Received," 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. Applicants should not enter the amount received from HUD in prior grants on this line, as this is an "initial report" and not an "update report."

On the HUD-2880, 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 FY 2018 must select "yes" under question two in "Part I Threshold Determinations," and complete the remainder of the form.

Question (23)

On the SF-424, is the Applicant Identifier (line 4) the same number as the Agency ID number on the HCS? Where can I find the Federal Entity Identifier (line 5a)? Is the Federal Award Identifier (line 5b) our grant number?

Answer (23)

On the SF-424, Applicants may leave lines 4, 5a, and 5b blank.

Question (24) **Updated as of August 3, 2018*

On the SF-424 signature page, should I sign and scan the document in order to upload it to grants.gov with the Executive Director's signature, or is there an electronic signature?

Answer (24)

New for the 2018 NOFA application, there is an electronic signature for SF-424 and HUD-2280. The SF-424 and several of the other required forms can be completed as web-forms in grants.gov.

Instructions on completing grants.gov web forms can be found in the [grants.gov online user guide](#).

Additionally, the [SF-424 instructions](#) available on grants.gov indicate that for line 21 of the form, "If the application is submitted via grants.gov, the signature of the authorized representative and the date signed are completed upon submission."

The Office of Housing Counseling will also accept SF-424's that have been signed, scanned, and uploaded in PDF format to grants.gov.

Question (25):

Are the NOFA applications for Local Housing Counseling Agencies (LHCAs) the same as those for Multi-State Organizations (MSOs), Intermediaries, and State Housing Finance Agencies (SHFAs)?

Answer (25):

No, there are different NOFA application packages. The application for LHCAs includes Form 9906-L, while the application for MSOs, Intermediaries, and SHFAs includes Form 9906-P. Moreover, MSOs, Intermediaries and SHFAs are required to include the relevant Excel files that supplement responses to Chart A2 and Chart C2 of the Form 9906-P. For more information, please see *Section IV (Application and Submission Information)* of the Comprehensive Housing Counseling Grant Program NOFA.

Question (26)

Will Intermediaries that are funded through the FY 2018 NOFA be able to make changes to their sub-grantee list?

Answer (26)

Yes, Intermediaries will be able to make changes to their sub-grantee list after awards are made by submitting a written request and detailed justification to HUD. In these cases requests for amendments are required and are subject to HUD approval. HUD reserves the right to adjust the award amount granted through this year's NOFA or a second-year funding run should the number of a grantee's network of sub-grantees and funded branches change significantly from that proposed in the grant application. For an Intermediary, SHFA or MSO, a significant change might include, but is not limited to, a 25 percent or greater decrease in the number of their sub-grantees and funded branches from that stated in the Intermediary's, SHFA's or MSO's grant application.

Question (27)

What is the definition of a "Rural" area as used by HUD in the 2018 Comprehensive Housing Counseling Grant Program NOFA? In addition, can HUD provide some guidance or direct agencies to a map that depicts rural areas?

Answer (27)

Section V.A.1.b.1.(a): Rural Communities, of the FY 2018 Comprehensive Housing Counseling Grant Program NOFA states 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, [here](#). Select "Single Family Housing Direct" and then "Property Eligibility" to determine if your service area is located within a defined rural area.

Question (28)

How do applicants earn preference points for Emergency Preparedness or Disaster Recovery?

Answer (28)

To receive preference points related to Emergency Preparedness or Disaster Recovery, Applicants must have conducted qualified activities such as providing housing counselors with training or having established a Continuity of Operations Plan (COOP) supporting either or both initiatives. Applicants must have described these activities in their approved housing counseling work plan on file with HUD. Applicants will indicate in HUD-9906 Chart A (Field D) whether they have conducted such activities.

Applicants may receive no more than two (2) preference points total in this NOFA. If Applicants earn preference points for Emergency Preparedness/Disaster Recovery, as well as Promise Zones, their total preference points will be capped at two points.

Question (29)

What are the requirements for claiming the Promise Zone bonus point?

Answer (29)

To receive bonus points related to Promise Zones, an Applicant and, if applicable, its Sub-grantees must obtain the required certification on Form HUD-50153, signed by the authorized official of the designated Promise Zone in-order-to verify that the Applicant, or one or more of its Sub-grantees have met the required criteria.

Form HUD-50153 can be found [here](#).

A Complete listing of Promise Zone authorized officials can be found [here](#).

The physical location of the Applicant's or Sub-grantee's office(s) is not specifically identified as a criterion for establishing eligibility for bonus points. Form HUD-50153 describes certain geographic criteria that must be met for the proposed activities and projects to be undertaken in-connection-with a Promise Zone. The authorized official must certify that:

- 1) The applicant is engaged in activities, that in consultation with the Promise Zone designee, further the purposes of the Promise Zones initiative; and
- 2) The applicant's proposed activities either directly reflect the goals of the Promise Zone, or will result in the delivery of services that are consistent with the goals of the Promise Zones initiative; and
- 3) The applicant has committed to maintain an on-going relationship with the Promise Zone designee for the purposes of being part of the implementation processes in the designated area.

Further questions related to Promise Zone designees and Authorized Officials can be sent to: promisezone@hud.gov.

Question (30)

In Chart A.1 and A.2 Attachment– Rating Factor 1, Field K - Average Counseling Hours per FY17 HECM Client, does this only include the actual time spent counseling, or can it also include the time spent completing case notes, filing, etc.?

Answer (30)

The average counseling time inputted in Field K of Charts A.1 or A.2 should be calculated based on the time recorded on the Certificate of HECM Counseling. Per Mortgagee Letter 2011-09, only the actual time spent meeting with the client, in person or by telephone, providing counseling may be recorded on Form HUD 92902, Certificate of HECM Counseling. Other time spent on the client, such as intake, putting together the information packet, follow-up and any other time other than actual counseling time cannot be included on the Certificate of HECM Counseling.

Question (31)

On Chart A2, INT SHFA MSO Characteristics, Field S – Serves Rural Community, if all of an agencies' sub-grantees/branch offices and counselors serve clients from throughout the country, and therefore could serve rural communities. Should we indicate a "yes" in Field S for all offices?

Answer (31)

We cannot advise an Applicant on how to respond to specific NOFA factors or questions. The instructions for Rating Factor 2 in the published NOFA advise Applicants to indicate in Field S of Chart A1 or A2 if the Applicant, or its Sub-grantees and/or Branches, if applicable, proposes to serve a community that includes a Rural area as defined by the USDA at 7 C.F.R. Section 3551.10.

The question is not whether the Applicant *can* serve rural areas, but whether you *propose* to do so as part of your work plan, and for your grant application. Agencies are expected to maintain a record in their Client Management Systems of households served in rural areas and to report this information on a quarterly basis using Form HUD-9902.

Question (32)

When responding in Chart A2, INT SHFA MSO Characteristics, Field T – Serving Area with No Internet Access — can you supply a resource which indicates areas in the country with no internet access? I have not been able to find one. Also, since all of our offices serve clients from all over the country, and we provide phone counseling in which no internet access is required, should we indicate a "Yes" for all offices?

Answer (32)

Possible resources for information on the availability of internet access are the Federal Communications Commission at www.fcc.gov and local Internet Service Providers.

We cannot advise Applicants on how to respond to specific NOFA factors or questions. HUD is requesting Applicants to identify whether the Applicant, its Sub-grantees or Branches serve an area that lacks internet access at the time of application submission. Your answer should not be based on an assumption that some of the areas served lack internet access. It should be based on your knowledge that a particular area served lacks internet access at the time of application submission.

Question (33)

When completing Chart B, *Services and Modes* of the 2018 Comprehensive Housing Counseling Grant Program NOFA, would the online Home Buyer Education course provided through ehomeAmerica be considered group education for purposes of reporting in Row D.

Answer (33)

Certain web-based (online) education provided through a third party may be considered group education for the purposes of completing the Chart B (Services and Modes) of the FY 2018 Comprehensive Housing Counseling Grant Program NOFA. The criteria that must be met in order to report this type of training is outlined in FAQ 2498, posted on [HUD Exchange](#). This is the same criterion that is required for a housing counseling agency to 'claim' web-based education on HUD Form 9902.

In order to report web based educational 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:

- 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 (34)

Rating Factor 3, Sub-factor 2 references an applicant's Work Plan. Should an updated Work Plan be submitted with the application, or can an agency reference the Work Plan they most recently submitted to HUD.

Answer (34)

HUD will be evaluating an applicant's Work Plan based on the information provided in the Housing Counseling Charts required by this NOFA, which must be consistent with the Applicant's Work Plan on file with HUD. If an Applicant wishes to make any changes to the counseling services it provides as part of its 2018 Comprehensive Housing Counseling Grant

Program NOFA application, it must file an updated work plan with HUD prior to the NOFA deadline.

Question (35)

For Rating Factor 3, Sub-factor 3, is there a definition or description of "housing counseling-related partnerships/collaboratives"? Our agency is involved in several formal and informal relationships as part of its service, and we want clarity on what is eligible for scoring.

Answer (35)

HUD has not provided a definition of "housing counseling-related partnerships/collaboratives." Both formal and informal relationships are eligible for scoring purposes.

Question (36) * Updated as of August 3, 2018

Should each sub-grantee, or branch office complete Chart E2, or should the Applicant write up a network-wide version, highlighting certain areas?

Answer (36)

An Applicant should prepare and submit one completed Chart E2 on behalf of your network of sub-grantees and/or branch offices.-In Field A, identify all jurisdiction(s) and service area(s) applicable to the Applicant and/or its network of sub-grantees and/or branches. In Field B, provide a brief description of impediments to fair housing in the jurisdiction(s) and service area(s) identified in Field A, as well as strategies for overcoming the impediments. In Field C, identify the source information on impediments. In Field D and E, describe at least one activity that addresses an impediment to fair housing options in the Applicant's distinct service areas, or, if applicable, in at least three of its sub-grantees and/or branches distinct service areas, and how the Applicant will measure outcomes related to the proposed activity or activities.

Question (37) * Updated as of August 3, 2018

I am trying to complete Chart A2 on the HUD-9906-P, **Totals from Chart A2 Attachment**, and am unable to enter triple digit figures in Fields D - G, L - U, W - Y, AB, AC, AD, and AE. What should can I do to ensure that I get credit for the correct totals in these Fields.

Answer (37)

The Office of Housing Counseling is aware of this limitation on Chart A2. All scorers will be directed to review the HUD-9906-P, Chart A2 Supplemental Excel attachment for all network totals.