

FY 2019 Comprehensive Housing Counseling Grant Program NOFA

Frequently Asked Questions – Part 1

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 FY 19 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.F Eligibility Information/Program-Specific Requirements Affecting Eligibility* 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 2018 Comprehensive Housing Counseling Grant Agreement Training](#) archived webinar, beginning on Slide 65. This is a helpful reference guide for potential new grantees, but please be aware that grantees awarded under the 2019 NOFA will be held to the requirements outlined in the 2019 Comprehensive Housing Counseling NOFA. Mandatory reporting requirements will be detailed in the 2019 Comprehensive Housing Counseling Grant Agreement.

Additionally, funding received under this NOFA is subject to all OMB Guidance and government-wide regulations applicable to federal financial assistance programs. Please see the Grant Agreement, [2 CFR Part 200](#), related FAQs, and archived webinars on [the HUDExchange website](#) for further detail on requirements related to grant recipients' use of federal funding.

General Questions

Question (3)

The 18-month performance period under the FY 2019 Comprehensive Housing Counseling Grant Program NOFA (October 1, 2018 – March 31, 2020) overlaps with the 24-month performance period under the FY 2018 NOFA (October 1, 2017 – September 30, 2019). How are grantees to deal with this overlap period?

Answer (3)

The 18-month performance period allows for flexibility in using grant funds. While some grantees may request retroactive reimbursements as far back as the start of the performance period, other grantees may choose to request reimbursement only for activities that occur after 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 (4)

Do I need to inform HUD if our organization has a structural change or merger during the application process or period of performance?

Answer (4)

Yes, anticipated changes of this nature must be reported to your HUD POC at least 60 days in advance, and HUD approval needs to be obtained. For more information, please see the *Mergers, Acquisitions, and Other Changes in Organizational Structure* subsection of *Section V.B. Review and Selection Process* in the FY 2019 Comprehensive Housing Counseling Grant Program NOFA.

Question (5)

What are the new items being scored in the FY 2019 NOFA?

Answer (5)

New scored items in the FY 2019 NOFA include:

- Timely validation of agency HCS profile
- Timely submission of 9902 reports
- Use of a client management system (CMS) to submit 9902 reports
- Positive outcomes of counseling (HUD 9902 Section 10)

For full details on scoring and point allocation, please see *Section V. Application Review Information*.

Question (6)

How do we apply?

Answer (6)

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 (7)

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

Answer (7)

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

Forms

Question (8)

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 (8)

Both the SF-424 and HUD-2280 forms have electronic signatures. 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 (9)

Where is the budget chart that used to be in Chart 9906?

Answer (9)

The budget items have been simplified. We only ask for your total budget from the previous fiscal year (10/1/2017 – 9/30/2018) and the proportion of your budget that was allocated to salaries and fringe benefits for personnel whose duties entailed the provision of counseling and education services.

Question (10)

Can you please clarify what I need to calculate for Chart A, Field S?

Answer (10)

Applicants must indicate the total funds expended on the salary and fringe benefits for housing counselors (Chart A, Field S). For an employee whose primary duty is providing counseling and education, the entire salary and fringe benefits may be considered. For employees whose primary duty is not counseling (e.g. program managers, administrative assistants, etc.), but who nevertheless conduct counseling sessions or group workshops as an ancillary duty, their salaries and fringe benefits should be prorated in accordance with the proportion of their efforts expended in providing such client services.

Question (11)

What is the WinZip file in the grants.gov application?

Answer (11)

In the WinZip instruction package, you will find the following:

- Comprehensive Housing Counseling NOFA pdf
- HUD-9906-L pdf (application for LHCAs)
- HUD-9906-P pdf (application for Intermediaries, SHFAs, and MSOs)
- Chart A2 Supplement xls (supplement for Intermediaries, SHFAs, and MSOs)
- Chart B Supplement xls (supplement for Applicants with leveraged funds)
- HUD 50153 (Promise Zone Certification)

Applicants can view the [Grants.gov Online User Guide](#) here for more information, or contact grants.gov Applicant Support at 1-800-518-4726, or support@grants.gov for more information on form submission.

Question (12)

Are there narrative sections to the application?

Answer (12)

Scored items that required separate narratives in previous NOFAs have been incorporated into the 9906 Charts. However, an organization description is still required as part of the

application. Please see *Section IV. Application and Submission Information* of the FY 2019 NOFA for complete details on submission instructions.

Question (13):

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 (13):

No, there are different NOFA application packages. The application for LHCAs includes Form 9906-L along with the 9906 Chart B Supplement (if the applicant has leveraged funds). The application for MSOs, Intermediaries, and SHFAs includes Form 9906-P, the 9906 Chart A2 Supplement (required), and the 9906 Chart B Supplement (if the applicant has leveraged funds). For more information, please see *Section IV.B.2 (Application and Submission Information)* of the Comprehensive Housing Counseling Grant Program NOFA.

Question (14)

What is the definition of a "Rural" area as used by HUD in the 2019 Comprehensive Housing Counseling Grant Program NOFA?

Answer (14)

Section V.A.1: Rating Factors states, under Rating Factor 2(a): *Rural Communities*, that HUD will use internal data sources to determine the extent that an applicant and its network (if applicable), serves a rural area as defined by the USDA at [7 C.F.R. Section 3550.10](#).

Question (15)

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

Answer (15)

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 will indicate in HUD-9906 Chart C (Fields I and J) whether they have conducted such activities.

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

Question (16)

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

Answer (16)

To receive bonus points related to [Promise Zones](#), an Applicant or, if applicable, its Subgrantees 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 Subgrantees, 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 Subgrantee's office(s) is not specifically identified as a criterion for establishing eligibility for the Promise Zone 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: promisезones@hud.gov.

Question (17)

I am confused about preference points – it appears there are three options this year. If our agency does all three, can we receive six points?

Answer (17)

Applicants may receive no more than two preference points total.

Question (18)

Can you please clarify which Ratings Factors (RF) are not part of the 9906 charts and require a narrative or supplement?

Answer (18)

Applicants with leveraged funds need to complete the Chart B Supplement (Excel). Additionally, all parent agencies need to describe their network using the Chart A2 Supplement (Excel). There are no narratives separate from the required 9906 charts.

Question (19)

On the HUD-9906-P charts, should intermediaries, SFHAs, or MSOs include subgrantees and/or branches that may have been providing housing counseling during a part of Fiscal Year 2019, but will not be seeking funds from the FY 2019 Comprehensive Housing Counseling NOFA?

Answer (19)

Please review [Section V.A.: Rating Factors of the 2019 NOFA](#). In this section, each of the rating factors and related charts are explained in detail including instructions on which subgrantees and/or branches should be reported. As a general rule, the 9906 Charts require information to

be entered only for proposed subgrantees and/or branches under the FY 2019 Comprehensive Housing Counseling NOFA. Accordingly, information on past subgrantees and/or branches to which funds will not be subgranted under the FY 2019 NOFA should not be included.

Chart A2, Fields R and S look for financial information related to the previous grant term, so any sub-grantees and/or branches that were part of your network during the previous fiscal year (10/1/2017-9/30/2018) should be reflected accordingly.

Question (20)

What are the scored items not covered in the 9906 Charts?

Answer (20)

HUD will use internal data sources to score the following items:

- Average length of a HECM counseling session
- Performance Review findings
- Proportion of rural clientele
- Total number of clients
- Services provided
- Timely validation of agency HCS profile
- Timely submission of 9902 reports
- Use of a client management system (CMS) to submit 9902 reports
- Positive outcomes of counseling (HUD 9902 Section 10)

Question (21)

Chart A2, Fields P1 and P2 will not let me enter a percentage symbol (%).

Answer (21)

In Chart A2, Fields P1 and P2, please enter a whole number between 0 and 100. HUD understands that this represents a percentage. Remember that the combined value of Fields P1 and P2 should sum to 100.