

## FY 2019 Comprehensive Housing Counseling (CHC) Grant Program NOFA

### Frequently Asked Questions – Part 4

#### Applicant Eligibility

---

##### Question (1)

I work for a State Housing Financing Agency (SHFA) that is not currently participating in HUD's housing counseling program. We would like to apply under the FY19 CHC Grant Program NOFA as a new applicant. Is our SHFA eligible to apply?

##### Answer (1)

Yes. SHFAs are eligible for this NOFA if they possess statutory authority to provide housing counseling throughout their entire state and adhere to all program requirements outlined in 24 CFR Part 214, the [OHC handbook](#), and other governing documents. SHFAs that are not currently participating in HUD's housing counseling program that apply under the NOFA as a new applicant must manually submit their FY18 (i.e. October 1, 2017 – September 30, 2018) [HUD-9902 data](#) with their NOFA application. Such applicants should leave the fields asking for the HCS ID on the HUD 9906-P and Chart A2 Supplement blank.

##### Question (2)

We are an intermediary and are adding a subgrantee to our network for FY19. For many years, they were a subgrantee under a different intermediary. As such, our HUD-9902 data for FY18 does not include that subgrantee's performance numbers since they have not been our subgrantee until now. Will we be allowed an opportunity to submit their 9902 along with ours to count those clients?

##### Answer (2)

For applicants who were a HUD-approved Intermediary in FY18, HUD will use the applicant's HUD 9902 information as reported in the Housing Counseling System (HCS), based on the network composition that existed in FY18. However, the funding methodology and many rating factors are based on your proposed network composition.

#### General Questions

---

##### Question (3)

We are being scored on grant expenditure. However, our HUD point of contact has delayed reviewing our quarterly reports and approving the voucher drawdown requests. As a result, it looks like we are delinquent and not using our FY18 grant money. Will that count against us? Is there anything we can do to mitigate the potential negative rating (e.g. submit a statement with our grant)?

##### Answer (3)

This will not count against you. In assessing grant expenditure history, HUD looks at grants whose period of performance has concluded and whose deadlines for final reports and

drawdowns have already passed. Delayed voucher processing that occurs within the grant period of performance (and any authorized extension) is not considered.

As a reminder, applicants may request a debriefing in accordance with the procedures indicated in the NOFA. In a debriefing the applicant may present evidence if they believe that an error occurred in the scoring of the application.

**Question (4)**

We are a newly-approved parent agency, and therefore did not have a network in FY18. Are there any aspects in which our application is different?

**Answer (4)**

A. Yes. For Applicants that were not listed in Housing Counseling System (HCS) as parent agencies during FY18 (for instance, because they were an Local Housing Counseling Agency (LHCA) during FY18 or they were an State Housing Finance Agency (SHFA) that was not HUD-approved), HCS will not have data that reflects their current status as parent agencies. Therefore, such applicants are required to manually submit an FY18 (i.e. October 1, 2017 – September 30, 2018) HUD-9902 reflecting their network. Additionally, such applicants must gather and provide total fiscal year 2018 expenses (Chart A, Field R) and salaries and fringe data (Chart A, Field S) for their main office and proposed network of subgrantees. Applicants that were HUD-approved parent agencies during FY18 will have their past performance scored on the HCS data that reflects their network during FY18.

**Question (5)**

My organization attempted to submit our HUD-9902 report through our Client Management System (CMS) and the submission failed, causing the report to be late. Will our application be penalized for un-timely reporting?

**Answer (5)**

This may affect your score related to timely HUD-9902 reporting. OHC guidance indicates that agencies should submit the HUD-9902 prior to the reporting deadline to account for such instances. The NOFA team will evaluate timeliness across all quarters of FY18, which should alleviate concerns related to one-time reporting issues an agency may have experienced. Please note that the [Housing Counseling Online 9902 Toolkit](#) provides a reminder to all agencies that that “If your agency is a HUD housing counseling grantee, failure to report will affect timely processing of grant vouchers and *may negatively affect your agency’s scores in HUD housing counseling grant competitions.*” (Emphasis added).

Applicants may request a debriefing in accordance with the procedures indicated in the NOFA, during a debriefing the applicant may present evidence if they believe that an error occurred in the scoring of the application.

**Question (6)**

When determining subaward amounts, should we place greater importance on the total number of housing counseling clients served by the agency or the total number of housing

counseling clients served exclusively with the HUD Comprehensive Housing Counseling grant funds?

**Answer (6)**

Grantees that manage a network of subgrantees and branches should choose the allocation method that best meets their priorities and objectives.

## **Grants.gov/Technical Issues**

---

**Question (7)**

I cannot find the *Certification Regarding Lobbying* that is described in the Application Checklist.

**Answer (7)**

Grants.gov has labeled the *Certification Regarding Lobbying* as the *Grant.gov Lobbying Form [V1.1]*.

## **Application/Charts**

---

**Question (8)**

In Chart A2, Fields R and S, do we limit the calculation to our main office, or do we include the cumulative sum for our network?

**Answer (8)**

Parent applicants must gather and provide total Fiscal Year 2018 expenses (Chart A, Field R) and salaries and fringe data (Chart A, Field S) for their main office and network of subgrantees.

**Question (9)**

Rating Factor 3C asks the Applicant to indicate the total funds expended on the salary and fringe benefits for housing counselors (Chart A, Field S). During what time period should the total funds cover?

**Answer (9)**

HUD will evaluate the Applicant's total salary and fringe benefits for the period of October 1, 2017 through September 30, 2018.

**Question (10)**

In the Chart A2 Supplement (Excel), Column P states "% of Award Applicant intends to Allocate to its Branches and Subgrantees." I can complete this section for each of my subgrantees and branches. However, I am unable to complete that section for the main applicant, since the box is grayed out. Please advise.

**Answer (10)**

Applicants only need to list the sub-allocation for each subgrantee and branch. The total of the sub-allocation percentages (Column P) found at the bottom of Chart A2 Supplement (Excel) will

be transferred to Chart A2, Field P2 (% of Award Applicant intends to Allocate to its Branches and Subgrantees).

**Question (11)**

In Chart B, can I list funding used for assistance with down payments and closing costs?

**Answer (11)**

No. Applicants can only include funds that exclusively allocated for the housing counseling program and not passed through to clients for assistance with down payments or closing costs. The leveraged resources in Chart B must be dedicated to running the housing counseling program and result in the provision of counseling and education services.