

# FY 2020 Comprehensive Housing Counseling Grant Program Supplemental NOFA

## Frequently Asked Questions – Part 1

### Section 1: Applicant Eligibility

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#### Question (1)

Who is eligible to apply for FY 20 Comprehensive Housing Counseling Supplemental Grant funding?

#### Answer (1)

All housing counseling agencies (including LHCA's, 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) that did not receive FY 19 Comprehensive Housing Counseling funds and 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 20 Comprehensive Housing Counseling Grant Program Supplemental 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 Grant Activity 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.3 Award Administration Information/Reporting* of the NOFA. Mandatory reporting requirements will be detailed in the FY 20 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 [2 C.F.R. Part 200](#), related FAQs, archived webinars on [the HUD Exchange website](#), and the FY20 Grant Agreement (if funds are awarded) for further detail on requirements related to grant recipients' use of federal funding.

**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 prior to the NOFA issue date but meet the Housing Counseling Program eligibility criteria set forth at 24 C.F.R. Part 214 can seek affiliation with a HUD-approved Intermediary or SHFA to access subgrant funding. Individuals, foreign entities, and sole proprietorship organizations are not eligible to directly apply for awards made under the Comprehensive Housing Counseling NOFA.

**Question (4)**

Must our agency's housing counselors be HUD certified in order for us to receive a housing counseling grant?

**Answer (4)**

At the time of the NOFA application, the agency's housing counselors do not have to be HUD certified. However, all housing counselors participating in the Housing Counseling Program must be HUD certified by the final compliance date of August 1, 2020. This requirement will become effective during the FY 20 CHC NOFA period of performance.

**Question (5)**

Our organization received FY19 Comprehensive Housing Counseling (CHC) funds. Can we still apply for the FY20 funds?

**Answer (5)**

No. Agencies that were directly awarded FY 19 funds through the NOFA for the Department's FY 19 Comprehensive Housing Counseling Grant Program funds are not eligible to apply under the FY 20 Supplemental NOFA.

For agencies awarded FY 19 Comprehensive Housing Counseling Grant Program funds, HUD will be using an expression of interest process to allocate FY 20 funds.

**Question (6)**

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 FY 20 CHC Grant Program Supplemental NOFA as a new applicant. Is our SHFA eligible to apply?

**Answer (6)**

Yes. SHFAs are eligible for this NOFA if they possess state statutory authority to provide housing counseling throughout their entire state and adhere to all Housing Counseling program

requirements outlined in 24 C.F.R. Part 214, HUD Housing Counseling Handbook 7610.1 REV-5, and other governing documents. An SHFA that is not currently participating in HUD's housing counseling program that applies under the NOFA as a new applicant must manually submit its FY 19 (i.e. October 1, 2018 – September 30, 2019) [HUD-9902 data](#) with its NOFA application. When completing the NOFA application, such applicants should leave blank the data fields asking for the Housing Counseling System (HCS) ID on the HUD 9906-P [Intermediary, State Housing Finance Agency, and Multi-State Organization Application] and Chart A2 Supplement.

**Question (7)**

We are a HUD-approved intermediary that did not receive FY 19 Comprehensive Housing Counseling funding and are adding a subgrantee to our housing counseling agency network for FY20. Accordingly, our HUD-9902 data for FY 19 does not include that subgrantee's housing counseling activity reporting. Will we be allowed an opportunity to submit this new subgrantee's HUD-9902 data along with ours to count those clients?

**Answer (7)**

No. For applicants that were a HUD-approved intermediary in FY 19, 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 FY 19. However, the applicant is rated on several criteria that will take into account an applicant's proposed network composition.

## Section 2: General Questions

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### Question (1)

The 18-month performance period under the FY 2020 Comprehensive Housing Counseling Grant (October 1, 2019 – March 31, 2021) overlaps with the 30-month performance period under the FY 19 grant (October 1, 2018 – March 31, 2021\*). How are grantees to provide housing counseling services, report counseling activity and request reimbursement during this overlap period?

\*The FY 19 CHC Performance Period was extended from 18 months to 30 months on April 27, 2020.

### Answer (1)

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. Grantees are reminded that per Section II. E of the Comprehensive Housing Counseling NOFA, “Grantees may not draw down on an award made through this NOFA until the prior year's award has been fully expended”.

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 grants, 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 (2)

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

### Answer (2)

Yes. Anticipated changes of this nature must be reported to your HUD Point of Contact (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 20 Comprehensive Housing Counseling Grant Program NOFA.

**Question (3)**

Can applications under the FY 20 Comprehensive Housing Counseling Program Supplemental NOFA be submitted by applicants in the form of a paper copy, or must the application be submitted through the Grants.Gov online process?

**Answer (3)**

An electronic copy of the Application Package and Application Instructions for this NOFA must 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](mailto:housing.counseling@hud.gov).

**Question (4)**

Will the Office of Housing Counseling offer a general training on the FY 20 Comprehensive Housing Counseling Grant Program Supplemental NOFA?

**Answer (4)**

Yes. the Office of Housing Counseling will provide a Comprehensive Housing Counseling Grant Program Supplemental NOFA webinar training, which will be advertised through the Office of Housing Counseling's mailing list, and it will be [archived on HUD Exchange](#) for those that miss the live webinar. The archive will provide the audio, presentation, and transcript of the training. Click [here](#) to sign-up for the Office of Housing Counseling's mailing list.

**Question (5)**

Does the use of grant funds cover all aspects of our housing counseling program?

**Answer (5)**

Grantees and subgrantees will be reimbursed only for the eligible activities outlined in *Section IV.F Eligible Activities* of the FY 20 NOFA and applicable grant agreement.

**Question (6)**

My organization was recently approved by HUD to participate in the Housing Counseling Program. Are there any requirements unique to us as a first-time applicant under the Comprehensive Housing Counseling Grant Program Supplemental NOFA?

**Answer (6)**

Yes. Applicants that received approval as a HUD housing counseling agency after September 30, 2019 would not have submitted a form HUD-9902 covering the period October 1, 2018 through September 30, 2019. As such, these newly approved applicants must include a HUD-9902 for the period October 1, 2018 through September 30, 2019 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 (HCS). Please assure that you have also registered for a DUNS number. Applicants cannot file an application in Grants.gov without an active DUNS number. DUNS numbers are issued by Dun & Bradstreet at no cost. The website can be found [here](#).

**Question (7)**

When will the grant funds be awarded and made available?

**Answer (7)**

FY 20 Comprehensive Housing Counseling Supplemental NOFA funding will be awarded in two phases. Returning grantees who submitted an Expression of Interest letter and who continue to meet eligibility criteria will be funded during the first phase of awards. Applicants who are new grantees under the FY20 Comprehensive Housing Counseling Supplemental NOFA will be notified by HUD and receive their award during the second phase.

**Question (8)**

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

**Answer (8)**

Applicants should review *Section V.A. Application Review Information* 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 are publicly announced, HUD will provide a debriefing related to its application to a requesting applicant. A request for a debriefing must be made in writing by the authorized official whose signature appears on the SF-424 or by his or her successor in office and be submitted to [housing.counseling@hud.gov](mailto:housing.counseling@hud.gov).

**Question (9)**

Must an intermediary or MSO select subgrantees through a Request for Proposals process?

**Answer (9)**

No. Applicants may use a method of their choosing to select members of their housing counseling subgrantee network. The awardee must ensure that all affiliated subgrantees comply with the standards described in the NOFA and HUD Regulations (24 C.F.R. 214).

**Question (10)**

Are there reporting requirements for state or local governments that make subawards?

**Answer (10)**

Yes. If a state or unit of general local government grantee makes assistance available on a competitive basis to affiliates or subgrantees, then they shall notify the public. The notification shall contain the elements required by [42 U.S.C. § 3545\(a\)\(4\)\(C\)\(i\)](#). This notification may be by any method conducive to providing information to the public.

Additionally, any subawards greater than \$25,000 must be reported in the [Federal Funding Accountability and Transparency Act Subaward Reporting System \(FSRS\)](#).

**Question (11)**

We are a newly approved parent agency and, therefore, did not have a housing counseling network in FY 19. Are there any aspects in which our application will be different when applying under the FY 20 CHC Supplemental NOFA?

**Answer (11)**

Yes, for an applicant that was not listed in Housing Counseling System (HCS) as a parent agency during FY 19 (for instance, because they were a Local Housing Counseling Agency (LHCA) during FY 19 or they were a State Housing Finance Agency (SHFA) that was not participating in the housing counseling program), HCS will not have data that reflects their current status as a parent agency. Therefore, such applicants are required to manually submit an FY 19 (i.e. October 1, 2018 – September 30, 2019) HUD-9902 reflecting their network. New applicants that were HUD-approved parent agencies during FY 19 will have their past performance scored on the HCS data that reflects their network during FY 19.

**Question (12)**

My organization experienced a change in our Client Management System (CMS) provider during FY 19. As a result, we experienced difficulties submitting our HUD-9902 report through our CMS; we had to manually report our housing counseling activity in HCS and the reports were late. Will our application be penalized for manually submitted and untimely reporting?

**Answer (12)**

The Office of Housing Counseling is aware of CMS related changes that affected participating Housing Counseling Agencies during the 2019 Fiscal Year, and these will be considered during scoring. OHC guidance indicates that agencies should submit the HUD-9902 prior to the reporting deadline to account for such instances and allow for manual entry when required. 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.*”

**Question (13)**

The NOFA states that “Applicants and Subgrantees must disclose to HUD the status of active HUD Office of Inspector General (OIG) audits or investigations at the time of the NOFA application submission date.” How should an applicant provide this information?

**Answer (13)**

If an applicant or subgrantee needs to disclose the status of an active HUD OIG audit or investigation at the time of application, that applicant must provide a written statement describing the OIG audit or investigative work occurring at the time of application. This statement can be included as an attachment to the application. See *Section IV. Application and Submission Information* for instructions on attaching this statement.

## Section 3: Grants.gov/Technical Issues

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### Question (1)

How do we submit the grant application?

### Answer (1)

Prospective applicants should review the Comprehensive Housing Counseling Grant Program Supplemental 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 (2)

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

### Answer (2)

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.

### Question (3)

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

### Answer (3)

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](mailto: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.

**Question (4)**

I submitted an application in error on Grants.gov. Can I withdraw or correct my application?

**Answer (4)**

No. There is no way to withdraw a submission once it has been submitted.

**Question (5)**

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

**Answer (5)**

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

## Section 4: Forms

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### Question (1)

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 (1)

Both the SF-424 and HUD-2880 forms allow 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 (2)

On the SF-424, which box should I check for Question 2 "Type of Application"?

### Answer (2)

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

### Question (3)

Is the form HUD-2880 Applicant/Recipient Disclosure/Update Report applicable to the FY 20 Comprehensive Housing Counseling Comprehensive Supplemental grant?

### Answer (3)

Yes, it is required for entities applying for all HUD funding. Please see instructions for completing the form HUD-2880, [here \(pages 2-3\)](#).

### Question (4)

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

### Answer (4)

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 (5)**

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 (5)**

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 of form HUD-9906. 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 FY20 must select "yes" under question two in "Part I Threshold Determinations," and complete the remainder of the form.

**Question (6)**

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

**Answer (6)**

Applicants do not have to enter an Applicant Identifier on Line 4 of the SF-424. On the SF-424, Applicants may leave lines 4, 5a, and 5b blank.

## Section 5: Application/Charts

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### Question (1)

Are there narrative sections to the application?

### Answer (1)

Yes, the scored items that required separate narratives in previous NOFAs are now incorporated into the HUD-9906 Charts. Please see *Section IV. Application and Submission Information* of the FY 20 NOFA for complete details on submission instructions.

### Question (2):

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 (2):

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 (3)

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

### Answer (3)

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. Emergency preparedness and/or disaster recovery include efforts in response to global pandemics. Applicants must describe their activities in Chart C (Fields I-J). HUD will award two point for this criterion.

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 (4)**

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

**Answer (4)**

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](mailto:promisезones@hud.gov).

**Question (5)**

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

**Answer (5)**

Applicants will receive no more than two preference points in total.

**Question (6)**

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 FY 20, but will not be seeking funds from the FY 20 Comprehensive Housing Counseling NOFA?

**Answer (6)**

Please review Section V.A, Rating Factors of the FY 20 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 HUD-9906 Charts require information to be entered only for proposed subgrantees and/or branches that the Applicant will fund under the FY 20 Comprehensive Housing Counseling NOFA. Accordingly, information on past subgrantees and/or branches to which funds will not be subgranted under the FY 20 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 (October 1, 2018 through September 30, 2019) should be reflected accordingly.

**Question (7)**

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

**Answer (7)**

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 HUD-9902 reports
- Use of a client management system (CMS) to submit HUD-9902 reports
- Positive outcomes of counseling (HUD-9902 Section 10)

**Question (8)**

Will intermediaries that are funded through the NOFA be able to make changes to their subgrantee list?

**Answer (8)**

Yes, intermediaries will be able to make changes to their subgrantee 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 or previous NOFA(s) should the

number of a grantee's network of subgrantees 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 subgrantees and funded branches from that stated in their grant application.

**Question (9)**

On the Chart A2 Supplement (Excel), must I list the census tract numbers for all of my branches and subgrantees?

**Answer (9)**

No. You only need to list the census tract numbers for those branches and subgrantees located in an Opportunity Zone. Then, transfer the total number of such branches and subgrantees from the bottom of Chart A2 Supplement (Excel), Column O1 to the appropriate location in Chart A2, Field O1 (pdf).

**Question (10)**

How do I know if my agency, or affiliated subgrantees, are located in an Opportunity Zone?

**Answer (10)**

For information on Opportunity Zone locations and eligibility please review the CDFI Fund's resources, [here](#). Additionally, the CDFI Fund's mapping tool is available, [here](#).

**Question (11)**

What is the Opportunity Zone Certification Form?

**Answer (11)**

The OZ Certification Form Opportunity Zone Preference Points ([HUD-2996](#)), is a new form for all HUD grant applications that offer Opportunity Zone preference points. Applicants must complete and submit this form with their CHC NOFA application in order to be eligible for these points.

**Question (12)**

How do I apply to receive Opportunity Zone preference points?

**Answer (12)**

Applicants must complete the Opportunity Zone Certification Form, [HUD-2996](#), in order to be eligible for Opportunity Zone (OZ) preference points. To receive these points, applicants must indicate in the form that they will use at least 50% of the award in OZ census tracts.

If an applicant indicates that they will be using less than 50% of awarded funding in OZ census tracts they should use the narrative section on pg. 2 of the HUD-2996 for the additional purpose of either: (1) indicating the reason(s) they are unable to expend at least 50% of the grant award within Opportunity Zone-designated tracts, or (2) making a compelling case as to why the amount they propose to expend will have a significant impact within Opportunity Zone-designated tracts.

**Question (13)**

The Certification for Opportunity Zone Preference Points asks for “Opportunity Zone Census Tract(s) which the proposed activities/projects will benefit.” If I am applying as an intermediary, MSO, or SHFA, must I list all of the OZ census tracts our network agencies are located in?

**Answer (13)**

If your network has multiple agencies located in Opportunity Zone census tracts, you may state this in the Certification for Opportunity Zone Preference Points Form HUD-2996. Additionally, in the Chart A2 Supplement you must list the census tract for each of your branches or subgrantees that are located in an Opportunity Zone and then provide the total number of Opportunity Zones on the 9906-P for which your branches or subgrantees are located. Do not list census tracts for branches or subgrantees that are not located in Opportunity Zones.

**Question (14)**

How will receiving Opportunity Zone preference points impact my Comprehensive Housing Counseling Grant award?

**Answer (14)**

In the Opportunity Zone Certification Form (HUD-2996), applicants certify that they will spend a certain percentage of their award in Opportunity Zone tracts. If the applicant is then awarded a Comprehensive Housing Counseling Grant, the applicant’s proposed budget and subsequent requests for reimbursement must align with the percentage of funds they certified to in the Opportunity Zone Certification Form.

**Question (15)**

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

**Answer (15)**

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.

**Question (16)**

Can you please clarify what is needed to calculate for Chart A, Field S?

**Answer (16)**

Field S (Salary and Fringe) will be a subset of Field R (Total Housing Counseling Program Expenses). Applicants must indicate the total funds expended on the salary and fringe benefits for housing counselors working at the parent agency and with any subgrantees (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 conducts 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. Chart A, Field R will capture the total housing counseling program expenses for both the parent agency and their complete proposed network.

**Question (17)**

In Chart A2, Fields R and S of the HUD-9906, do we limit the calculation to our main office, or do we include the cumulative sum for our network?

**Answer (17)**

Parent applicants must gather and provide total Fiscal Year 2019 housing counseling program expenses (Chart A, Field R) and salaries and fringe data (Chart A, Field S) for their main office and network of subgrantees. Field S (Salary and Fringe) will be a subset of Field R (Total Housing Counseling Program Expenses).

**Question (18)**

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 (18)**

HUD will evaluate the Applicant's total housing counseling related salary and fringe benefits for the period of October 1, 2018 through September 30, 2019. Where the Applicant is an Intermediary, Multi-State Organization, or SHFA the housing counseling related salary and fringe expenses for the applicant and its complete network should be included.

**Question (19)**

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 (19)**

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 (20)**

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

**Answer (20)**

No. Applicants can only include funds that are 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.

**Question (21)**

What is the threshold used to determine the points in a given Sub-Factor?

**Answer (21)**

The Office of Housing Counseling does not disclose the exact scoring rubric for every Rating Factor and Sub-Factor. Applicants should provide concise, accurate answers on the application materials.

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.