



Notice of Funding Availability for HUD's FY 2013 Comprehensive Housing Counseling Grant Program

Frequently Asked Questions 02/20/13

HOUSING COUNSELING NOFA TRAINING AND ASSISTANCE

1) Question: Will there be a webinar to explain this year's NOFA?

Answer: Yes. The Housing Counseling NOFA training webinar took place on Thursday, February 14, 2013. In the event you could not attend the training, the session is archived at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/sfh/talk/parc/phiarch

2) Question: I have several questions about the Comprehensive Housing Counseling Grant Program NOFA. Is there somebody I can speak to directly to discuss some of these questions?

Answer: A team of HUD's Office of Housing Counseling staff is working to answer questions about the NOFA in order to provide consistent written response to all questions. Please e-mail your questions to: housing.counseling@hud.gov. You will receive a response either directly or via the list of Frequently Asked Questions posted on: www.hud.gov/housingcounseling

ELIGIBILITY AND DECIDING HOW TO APPLY

1) Question: Please confirm that Applicants for HUD's NOFA are required to be registered in the Central Contractor Registration (CCR) System for Award Management (SAM) and that this is a new requirement. Our agency is not registered and would like some guidance on where to begin.

Answer: Yes, all Applicants must have an active registration in the CCR. As of July 2012, the General Services Administration (GSA), which operates CCR.gov, is consolidating a number of its systems into a single platform called the "System for Award Management" (SAM) found at www.SAM.gov. For registrants with active registrations in the CCR, this transition will be seamless as registrations will automatically migrate to the new SAM platform. However, anyone that did not

have an active registration in SAM as of July 2012 will have to update/renew their registration in SAM. HUD will not make an award of funds to an applicant organization that does not have an active registration in CCR/SAM.gov. See Section III of the General Section for more information. In addition, visit the FAQs on: www.SAM.gov.

2) Question: Must an organization be an approved housing counseling agency to apply for the Comprehensive Housing Counseling Grant Program NOFA?

Answer: Only HUD-approved housing counseling agencies and State Housing Finance Agencies are eligible to apply directly to HUD for the Comprehensive Housing Counseling Program NOFA. Please see Section II. B. "Eligible Applicants," Paragraph 1. If your organization is interested in becoming a HUD-approved housing counseling agency, you may begin the process by completing form HUD-9900, "Application for Approval as a Housing Counseling Agency." If your agency is not currently eligible to apply for funding under the FY2013 NOFA but is interested in securing funding to support housing counseling activities in FY2013, your organization might explore the possibility of indirect funding from HUD as a sub-grantee of a HUD-approved Intermediary or a State Housing Finance Agency grant applicant. Please see Appendix A of the NOFA for a list of HUD-approved Intermediaries and State Housing Finance Agencies.

3) Question: Can you tell me which Intermediaries are located in the same county as my agency?

Answer: Most Intermediaries have the discretion to include in their applications agencies located in any given county regardless of their physical location. You can find a list of HUD-approved Intermediaries and State Housing Finance Agencies in Appendix A of the NOFA.

4) Question: We have been a HUD-approved LHCA for nearly 20 years. Given both the anticipated amount of funding and HUD's increased support for networks, would our efforts be better spent applying for a grant directly or through an Intermediary or State Housing Finance Agency?

Answer: HUD cannot advise your agency whether to apply directly for funds as an LHCA, or to network with a parent organization. HUD desires to provide an incentive to affiliate with an Intermediary or State Housing Finance Agency (SHFA) and to recognize the additional costs and benefits that arise from the parent relationship. See Section I.C.1 Encouraging Counseling Networks.

A HUD-approved LHCA has two options for grant application under the 2013 Housing Counseling NOFA. The HUD-approved LHCA may apply directly to HUD. Alternatively, a HUD-approved LHCA may be included as a sub-grantee in the application of an Intermediary or SHFA. The Intermediary or SHFA will receive a Base Award amount based on the number of proposed sub-grantees of that parent organization. This NOFA encourages LHCA's to network and become sub-grantees of parent organizations. However, the parent organization will have discretion on how it disburses and appropriates grant funds to its sub-grantees.

5) Question: Our agency has previously applied for funding as a Local Housing Counseling Agency (LHCA). If we choose to apply with an Intermediary under this NOFA, does that preclude us from applying as an LHCA in the future?

Answer: HUD cannot comment on the requirements of future Housing Counseling Program NOFAs. However, the fact that a HUD-approved LHCA has previously partnered with an Intermediary to obtain housing counseling funding does not preclude the LHCA from applying directly to HUD for grant funds under this NOFA.

- 6) **Question: We do not have a housing counseling network in this area. If we plan or collaborate to build one should we still apply for the FY 2013 Comprehensive Housing Counseling Grant Program NOFA? Is there a ballpark figure of amount of awards and dollar amount of each?**

Answer: The type of collaboration or network you refer to in your question will be instrumental in determining if that network is eligible to apply for this FY 2013 NOFA. All housing counseling agencies (including Local Housing Counseling Agencies (LHCA), Intermediaries and Multi-State Organizations (MSO) that are directly approved by HUD, and State Housing Finance Agencies (SHFA) are eligible to apply directly to HUD for this NOFA. However, each LHCA, Intermediary, and MSO that applies under this NOFA must have obtained HUD approval on or before the submission of their NOFA application to be eligible to receive grant funding under this NOFA. SHFAs are eligible to apply directly without having obtained prior HUD-approval. Housing Counseling agencies that have not received HUD approval are encouraged to affiliate with a HUD-approved Intermediary, MSO or SHFA. Approved Intermediaries, MSOs or SHFAs will receive a Base Award amount based on the number of proposed sub-grantees of that parent organization. See pages 27 and 28 of the NOFA “Funding Methodology” for additional information.

- 7) **Question: We are a HUD-approved LHCA that will again apply to HUD directly for grant funds. We don't think the Intermediaries in our region are a good match for our agency. Therefore, in the future, we would like to apply for funding as an Intermediary. What is the process for becoming an approved Intermediary?**

Answer: You can view information on the HUD approval process at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/sfh/hcc/hccprof13. Detailed information and additional requirements of the Housing Counseling Program are provided in the [Housing Counseling Program Handbook 7610.1](#), Rev-5. Chapter 2 of the Handbook describes the HUD-approval process. The Handbook is available through HUDCLIPS on HUD's website, and may be requested by telephone weekdays between the hours of 8:00 a.m. and 5:15 p.m. ET by calling (800) 767-7468. Written requests should be addressed to:

U.S. Department of Housing and Urban Development
Distribution Section, Room B-100
451 Seventh Street, SW
Washington, DC 20410

- 8) **Question: Where can I find specifics about applying for the Housing Counseling Program NOFA as a State Housing Finance Agency?**

Answer: For information on applying for the grant as a State Housing Finance Agency, see “Application and Submission Information” in Section IV.B.2.e. on page 14 of the NOFA. In order to

apply for grant funds, State Housing Finance Agencies must submit evidence of their statutory authority to operate as a SHFA, and evidence of their authority to apply for funds and subsequently use any funds awarded. SFHA applicants should also verify the accuracy of their agency profile in HUD's Housing Counseling System (HCS), and validate the information in HCS prior to submitting their grant application. HUD will contact SHFA Applicants that are new to the program to establish their profiles in the HCS system.

- 9) **Question: Please provide clarification on how HUD would like Intermediaries to count sub-grantees and funded branches for purposes of the NOFA application. For instance, if an Intermediary has 10 sub-grantees, and each of those sub-grantees has 10 funded-branches, would the Intermediary get "credit" under the NOFA for 100 sub-grantee-funded branches?**

Answer: The 2013 NOFA provides base award funding calculated by using the number of sub-grantees and funded branches (excluding Branches of LHCA's and Branches of sub-grantees) proposed by the Applicant. A "funded branch" is an actual branch of the parent agency, not the branch of a sub-grantee that the parent proposes to fund. If an Applicant proposed to fund 10 sub-grantees who each have 10 branches, your agency will be proposing to fund 10 sub-grantees.

- 10) **Question: Please provide clarification on the "Limits on Applicants" section of the NOFA on pages 7 and 8. Can sub-grantees apply for the Comprehensive grant if they plan to use the Comprehensive grant for other types of housing counseling other than reverse mortgage counseling? Or can they apply only if they plan to use the Comprehensive grant for reverse mortgage counseling?**

Answer: Sub-grantees that are HUD-approved LHCA's and receive a sub-grant for reverse mortgage counseling from an Intermediary that exclusively provides reverse mortgage counseling can also apply for a Comprehensive Housing Counseling grant directly from HUD or indirectly through an Intermediary or SHFA. In these cases, if the LHCA receives a Comprehensive housing counseling grant directly from HUD or indirectly through an Intermediary or SHFA, the LHCA will be able to use the Comprehensive grant for any eligible activities described in the NOFA, including expenses for services other than reverse mortgage counseling.

- 11) **Question: Do the OMB A-133 audit filing requirements, as outlined on page 7 of the NOFA "External Audits and Investigations," apply to the sub-grantee network as well?**

Answer: Yes. The requirements of OMB A-133 apply to non-Federal entities that receive Federal cost-reimbursement contracts either directly from Federal awarding agencies or indirectly from pass-through entities. Under this NOFA, a sub-grantee of a network will be receiving Federal funds indirectly through a pass-through entity, and therefore, OMB A-133 requirements apply.

- 12) **Question: Is there a standard, HUD-recommended sub-grant agreement form for this section? Or can the sub-grantee agreement be crafted by our general counsel?**

Answer: HUD does not provide a suggested or sample sub-award agreement for a parent agency to execute with its sub-grantees. However, all sub-award agreements must satisfy the requirements of the General Section of the NOFA and the grant agreement between HUD and the grantee.

COMPLETING THE APPLICATION

- 1) **Question: I have attempted to download the Comprehensive Housing Counseling Grant application on www.Grants.gov . I can get only as far as entering my email address so that I will receive updates. I have backed out and attempted to download several times, but cannot. Can you please provide assistance with this?**

Answer: If you have technical difficulties in accessing the grant application materials through Grants.gov, you should call the Grants.gov help desk at (800) 518-4726, or you can e-mail support@grants.gov. The Grants.gov help desk is available 24 hours a day, 7 days per week, except federal holidays. If you are experiencing technical difficulties with electronic application submission, it is imperative that you maintain careful records of all your communications with www.grants.gov attempting to resolve the issue.

- 2) **Question: The NOFA refers to a new set of charts which are not included in the zip folder on Grants.gov. How can these best be accessed?**

Answer: The grant application download in www.grants.gov includes two sets of zip folders: one labeled “Download Application Instructions” and another labeled “Download Application Package.” The charts are included in the zip folder labeled “Download Application Instructions” in an Excel document titled “HUD 9906 Housing Counseling Charts.xlsx.”

- 3) **Question: How do we verify the status of our organization in order to receive the bonus points for “Preferred Sustainable Communities Status”? We have downloaded Form HUD 2995, but are unsure about contacting a point of contact.**

Answer: To verify whether your program will be operating within a Preferred Sustainable Status Community area, go to:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/nofa11/psscontacts. This website lists eligible areas and identifies points of contact for each area. The points of contact are authorized to certify on Form HUD-2995 that your program meets the Preferred Sustainable Communities Status requirements.

- 4) **Question: In prior years, Intermediaries needed to provide the names of all counselors that would be providing counseling services under the grant. I do not see this requirement in the FY13 NOFA application. I know that each sub-grantee needs to respond to some questions in the HUD-9906 about their staff’s training and certification, but it’s not clear if counselor-level detail is required.**

Answer: In an effort to streamline the Housing Counseling Program NOFA, HUD has reduced the level of detail required for counselors who will provide counseling services under the grant. The names of each counselor do not need to be provided. See Chart A along with the narrative descriptions in the NOFA for the relevant information, including training and certification, which you need to complete for each sub-grantee.

- 5) **Question: I have a question about completing SF-424, Application for Federal Assistance given that Applicants are not required to submit a budget for the application. Question 18 on SF-424 requests an estimate of funding. We have totals for our leveraged funds, but for the federal**

line, should we just enter the \$13,000 that HUD estimates as the base award for LHCA's? Will this limit us from receiving additional funding above this amount should it be available?

Answer: Applicants are not required to request a specific dollar amount, and should not enter a response to line 18a of the SF-424, Application for Federal Assistance. See Page 13 of the 2013 Comprehensive Housing Counseling Grant Program NOFA. Entering a response to line 18a could limit the funding amount an Applicant receives.

- 6) Question: Please clarify the initial period of performance for grants awarded under this program NOFA – i.e., October 1, 2012 through September 30, 2013. Does this mean the period for which the funds would be applied to? Aren't we funding for next year?**

Answer: The funding for this FY 2013 NOFA is to be applied toward housing counseling conducted during the performance period of October 1, 2012 through September 30, 2013. Once the funding is awarded, grantees are allowed to bill the grant for counseling that occurred back to October 1, 2012.

- 7) Question: Regarding Rating Factor 3 – Past Performance – Budget (page 22 of NOFA): Our agency has an extension through March 31, 2013. Should our budget reflect the period October 1, 2011 through March 31, 2013?**

Answer: Although your agency received a grant extension through March 31, 2013, the NOFA requests that you submit your agency's program budget for the period October 1, 2011, through September 30, 2012. Therefore, you should only include budget information for the requested time period.

- 8) Question: As an Intermediary, should we provide a succession plan (page 27 of the NOFA), for our organization or for our sub-grantees? Also, our sub-grantees are in rural areas, with no other counseling agencies nearby. How do they possibly have a succession plan?**

Answer: As provided in the NOFA, Intermediary-applicants must provide a transition or succession plan that includes you as the parent organization, as well as each of your proposed sub-grantees. Although you do not counsel clients as the parent organization, your succession plan should still provide a plan to ensure continuity of services to consumers in the event that you or a sub-grantee become ineligible for continued funding notwithstanding your (or your sub-grantee's) proximity to other housing counseling agencies. One of the primary purposes of a succession plan is to ensure that if something adverse happens to an Intermediary, there is a plan in place to guarantee continued counseling from sub-grantees and/or a plan for sub-grantees to re-affiliate with other Intermediaries.

- 9) Question: Please clarify the scoring under Factor 2, Sub-factor 2, Departmental Policy Priorities. At the bottom of p. 19 of the Program NOFA, it says that "Each Policy Priority addressed below has a point value of two (2) points." However, under Affirmatively Furthering Fair Housing (AFFH), the instructions say in several places that only one point is available to Applicants responding to that policy priority. Will one or two point be awarded under AFFH?**

Answer: Each policy priority, including the Affirmatively Furthering Fair Housing (AFFH) Priority, has a point value of two (2) points. The reference to policy priority point in sub factor 2 (b) describing the AFFH priority should be construed to mean two points.

10) Question: We have reviewed the NOFA and understand the base amount but did not see information and calculation of the administrative portion of the funding. Is there a set percentage or base amount of administrative fee associated with this grant?

Answer: The NOFA does not set a specific percentage or amount of administrative fees for the purpose of calculating award amounts. After learning the number and nature of actual applicants, HUD will likely select and uniformly apply a percentage of the Base Award. This is a cost reimbursement grant, so administrative fees must be the actual cost to administer your agency's housing counseling program.

11) Question: As we are completing the grant application for the Comprehensive Housing Counseling grant, we encountered an issue in Rating Factor 4, Chart D- Leveraging. The instructions say to complete the chart, describing all sources of leveraged, non-federal funding. However, the chart itself only allows one line to describe any leveraged funds that are not being given to a sub-grantee. As an LHCA, we do not have sub-grantees, and only one line is available to describe multiple sources of leveraged funds. How can we include multiple funding sources on one line, or modify the form to create more space?

Answer: Unfortunately, in Chart D there is no way to add rows for additional funding sources for the Applicant. Therefore, to record multiple funding sources for the Applicant, you should list the first source in the Applicant row and the additional funding sources in the rows labeled "Sub-grantees or Branches (if applicable)." In Column B, "Names of Applicant, Sub-grantees/Branch Offices Proposed to be Funded" be sure to put the Applicant name so it is clear that the funding source is for the Applicant rather than a sub-grantee or branch.