

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

Frequently Asked Questions – Part 2 Questions – REVISED 3/11/13

ELIGIBILITY AND DECIDING HOW TO APPLY

1) Question: As a SHFA, do we need to complete and submit the 9900 form to be eligible to apply for the FY2013 NOFA, or can we just submit our application?

Answer: To apply for the FY 2013 NOFA, a State Housing Finance Agency (“SHFA”) is not required to submit an application for approval (Form HUD-9900) to participate in HUD’s Housing Counseling Program provided that the SFHA has the statutory authority to provide housing counseling throughout their entire state and adheres to all program requirements as outlined in 24 C.F.R. Part 214, HUD Handbook 7610.1, REV-5, and other governing documents. However, if the SFHA applies for but does not receive HUD Housing Counseling Program funds, the SFHA will be required to submit to HUD the information requested in the HUD Form 9900.

There two paths through which a SHFA may begin participating in HUD’s Housing Counseling Program:

- A. Submit a successful grant application or otherwise be awarded a HUD housing counseling grant. 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.
- B. Submit a request and, if applicable, provide HUD with a list of affiliates and assure that each affiliate meets all program requirements. SHFAs not planning to submit a housing counseling grant application or that failed to receive funding from HUD but are still interested in participating in HUD’s Housing Counseling Program must submit the information required for SHFAs in form HUD-9900 Housing Counseling Program Application, to the HUD Homeownership Center that has jurisdiction over their state. See Appendix 1 of Handbook 7610.1, Rev-5.

This link provides direct access to [HUD’s Housing Counseling Handbook, 7610.1 REV-5](#)

2) Question: Is it necessary for us, as the direct grantee, to have a Client Management System, since we do not provide direct counseling services to clients? As a follow-up, is it necessary for all sub-grantees to use the same Client Management System as we do in order to report to us?

Answer: Yes, program regulations require every agency participating in the Housing Counseling Program to utilize a Client Management System (CMS), including intermediaries or SHFAs that do

not provide services directly. Intermediaries and SHFAs would still utilize a CMS to submit to HUD agency profile information, and, ideally, evaluate the performance of agencies in their network. It is not required that all sub-grantees of funded branches in one network utilize the same CMS, although HUD recommends they do.

3) Question: If an agency has been funded under an Intermediary, is it considered HUD-approved?

Answer: Simply being funded as a sub-grantee by a HUD-approved Intermediary in the past does not make an agency a HUD-approved Housing Counseling Agency, nor does an agency's status as a sub-grantee make them eligible to apply directly to HUD for a grant as either a Local Housing Counseling Agency or an Intermediary under this NOFA.

Only HUD-approved housing counseling agencies, meaning agencies that are directly approved by HUD, and State Housing Finance Agencies are eligible to apply directly for the FY 2013 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 to possibly apply independently under future NOFAs, you may begin the process by completing form HUD-9900, "Application for Approval as a Housing Counseling Agency." This form and instruction can be accessed via HUD's website:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/sfh/hcc/hccprof13

4) Question: Can a LHCA affiliate with more than one Intermediary? For example, if you are a member of NeighborWorks and participate with that organization in the NOFA, can you also participate with another Intermediary or SHFA?

Answer: As stated on page 7 of the Comprehensive Housing Counseling Grant Program NOFA, applicants and sub-grantees are prohibited from accessing HUD Housing Counseling Program grant funding under this NOFA from multiple sources. The intent of this requirement is to prohibit an agency from applying for and/or receiving funds under this NOFA from multiple sources, such as more than one intermediary. However, there are two specific exceptions to this "double dipping" prohibition. See page 8 of the NOFA for detailed information about these exceptions.

COMPLETING THE APPLICATION

1) REVISED Question: The application package, specifically Form 424 requires amounts in section 18 to validate. Your instructions are not to include amounts in 18a but then the form does not validate without errors. Please advise.

REVISED Answer: Enter \$1 in 18a. Please note that it is not necessary for Applicant to resubmit the application package if the Applicant has already submitted with zero entered in 18a.

2) Question: Is the NOFA requesting that applicants submit a housing counseling work plan?

Answer: Factor 3, Section (2) on page 23 is entitled "Projected Performance – Work Plan".

3) Question: This question regards Tab 2 / Chart B – Services and Modes accompanying the application. We have one other Service we would like to add to Column A, but there doesn't

appear to be anywhere we can specify the service. The cell is locked to editing. Should we describe the service on an Attachment and, if so, where should we reference that Attachment on the Chart?

Answer: Chart B provides space for up to three services not already listed, so applicants are limited to those three additional entries. Applicants entering any additional services on the chart must specify what the “other” service is. They can do this on the lines immediately below the chart.

- 4) Question: In Chart A, as an Intermediary that also has a branch, would I fill out a line for both the Intermediary and the branch?**

Answer: Yes, just as occurs in the example provided for Chart A.

- 5) Question: Chart A, Applicant Characteristics (Tab 1, Column X), indicate the names(s) of the network(s)/ collaborative(s). Can you define a housing related network?**

Answer: This question refers to factor 3(3)(a):

(3) Projected Performance/Work Plan – Coordination (5 points).

(a) **Housing Counseling-related Network(s)/Collaborative(s).** In scoring this sub-factor, HUD will reward Applicants that actively participate in housing counseling related network(s)/collaborative group(s). If the Applicant, or proposed sub-grantees and branches, participate in any local, regional or state housing counseling related networks/collaborative....

In this specific section, the term “network” is referring to groups, task forces, associations and coalitions of counseling agencies, independent of the HUD Housing Counseling Program and applicant networks, that address housing counseling related issues, for example regional foreclosure prevention task forces.

- 6) Question: The NOFA has a spreadsheet that counts how many times we mark “x” in a field. Are all entries weighted the same or are some different? For example, the Preferred Sustainable Communities is 2 points but on the spreadsheet will show up as one “x”. Does “counseling in multiple languages” count the same as “exit surveys”? The point system will be helpful to know as we complete our application.**

Answer: The NOFA contains information regarding points and weighting of the various factors and sub-factors. HUD cannot provide any additional information beyond what is already provided in the NOFA.

- 7) Question: The presenter stated on the February 14th Webinar that we needed to have Adobe v.9.0 in order to submit our HUD application. She stated if we had an older version, our application would be rejected. However, in order to download the application, HUD system requirements are 10.1 or above. If you do not upgrade, you cannot gain access to the form. I therefore upgraded to the latest version (11.1) to open the application form. Adobe does not allow you to “downgrade” a version. If we are not able to downgrade, but cannot complete the form unless you upgrade, how can we be assured the application will be received?**

Answer: HUD’s General Section instructs:

(1) Narrative Statements to the Factors for Award. If you are required to submit narrative statements, you must submit them as an electronic file in Microsoft Word Office 2007 (or earlier) (.doc), Microsoft Excel 2007 (or earlier) (.xls), or in Adobe (.pdf) format that is compatible with Adobe Reader 9.4, 10.0.1, or the latest version available from Grants.gov. **If HUD receives a file in a format or software other than those specified or that is not compatible with HUD software, HUD will not be able to read the file, and it will not be reviewed.**

The latest version available through grants.gov is Adobe Reader 11.

However, another HUD grant program recently experienced two applicants that were unable to submit their applications, apparently due to problems with Adobe Reader 11. Applicants utilizing version 10.0.1 did not experience similar problems. Based on this experience, it is critically important that users that may already have Adobe 11 installed follow the directions on Grants.gov to instead utilize an older version of Adobe.

Grants.gov recommends that if applicants encounter this issue, they submit their application using any supported version below Adobe Reader XI. Previous versions of the software can be downloaded here: <http://get.adobe.com/reader/otherversions/>.

Please refer to the [compatibility table](#) for additional information about supported versions of Adobe Reader.

Computer	Operating System	Forms Program	Compatible
Mac	10.6.8	Adobe Reader (10.1.4)	Yes
Mac	Tiger / Leopard	Adobe Reader (8.1.1,8.1.2,8.1.3,8.1.4,8.1.5,8.1.6,9.0,9.1,9.1.1,9.1.2,9.2,9.3.2, 9.4)	Yes
PC	Win 7	Adobe Reader (10.1.4)	Yes
PC	Win XP	Adobe Reader (8.1.1,8.1.2,8.1.3,8.1.4,8.1.5,8.1.6,8.1.7,9.0,9.1,9.1.1,9.1.2,9.2,9.3.2,9.4, 10.1.4)	Yes
PC	Win Vista	Adobe Reader (8.1.1,8.1.2,8.1.3,8.1.4,8.1.5,8.1.6,8.1.7,9.0,9.1,9.1.1,9.1.2,9.2,9.3.2,9.4, 10.1.4)	Yes

Applicants experiencing this, or other, technical problems should contact grants.gov for assistance, and document that interaction.

8) Question: What should be put in Column A – Chart F AFFH (Jurisdiction/service area)? Should this be a state and a list of counties served?

Answer: Yes, the state and a listing of counties served are sufficient.

POST APPLICATION INFORMATION

1) **Question: What are the reporting requirements for SHFAs who administer a network of sub-grantees? Do the sub-grantees report to HUD directly, or do they report to us first, and we submit a consolidated report to HUD?**

Answer: After awards are announced, HUD will issue a grant agreement to potential grantees. This grant agreement will detail reporting requirements under the grant. While HUD is unable to share the new grant agreement at this point, we can answer your questions from the perspective of past grant agreements.

Under the terms of the 2012 HUD Housing Counseling Grant Agreement, the SHFA Grantee was required to submit consolidated reports to HUD reflecting activity for each sub-grantee and the SHFA. Specifically, SHFAs were required to submit quarterly report for each Sub-grantee and funded Branch containing the following:

1. Grantee's name, address, and grant number as they appear on the grant document;
2. Start and end dates of the report period;
3. Hourly rate. Identify each counselor or other employee whose time/activity is being billed to the Grant
4. Client List. List all counseling client file numbers and group or group education file numbers attributed to the Grant in alpha or numeric order
5. Staff hours. Indicate for each relevant counselor and other employee the total number of hours being billed to the Grant cumulatively and for the quarter.
6. Budget. Submit a detailed, comprehensive budget listing expenses for each distinct quarter, and the Grant period to date, under the Grant.
7. Achievement of Goals. If applicable, explain why established goals were not met, or why they were exceeded
8. Authorization. Include the signature and title of a person authorized by the Grantee to sign the report;
9. Form HUD-9902. Update the Form HUD-9902 electronically through the Housing Counseling System (HCS) so that the right hand column, or *HUD Housing Counseling Grant Activity* column, reflects activity funded with HUD housing counseling grant funds.

Intermediaries, SHFAs and MSOs were also required to submit the following HUD Housing Counseling Grant network-wide information, for both the reporting period and cumulative period:

10. Sub-allocations. A listing of: (a) the Sub-grantees and funded Branches and corresponding HUD housing counseling sub-grant amounts and allocations, for each quarter and cumulative period; and (b) a Dun and Bradstreet Universal (DUNS) Identifier number for each.
11. Administrative Cost. A detailed budget accounting for how all administrative funds, *i.e.* funds used to run the program and not passed through to Sub-grantees or allocated to Branches but, were spent by the Intermediary, SHFA or MSO, including training, travel, salaries, and equipment, for each quarter and cumulative.
12. Billing Methodology. Explain clearly the methodology employed to reimburse Sub-grantees or funded Branches. (For example, include the formula for calculating a counselor's hourly

rate attributed to the Grant, or how each cost is calculated for fixed-cost counseling/education activity).

13. Form HUD-9902. Intermediaries, SHFAs and MSOs must ensure that Sub-grantees and funded Branches update the Form HUD-9902 electronically through the Housing Counseling System (HCS) so that the right hand column(s), or HUD Housing Counseling Grant Activity column(s), reflects activity funded with HUD Housing Counseling Grant or sub-grant funds.
14. Achievement of Intermediary/SHFA/MSO Goals. Explain why established goals were not met, or why they were exceeded, if applicable. Explain what, if any, new strategies and work plan adjustments will be made during the next quarter in order to better meet projected outputs and outcomes.
15. Federal Financial Report. Complete and submit the Form SF-425, summarizing financial data, including program income, for each quarter. The form can be accessed at: <http://www.forms.gov/bgfPortal/main.do>.

Additionally, the 2012 grant agreement contained the following provisions that were applicable to grantees, including SHFAs. It is critical that new applicants understand these responsibilities.

Documentation of Expenses. Grantee must maintain source documentation of direct costs, such as invoices, receipts, cancelled checks, and personnel activity reports, to support all LOCCS draw requests for payment. This information must be made available to HUD upon request and maintained for a period of at least three (3) years after the expiration of the Grant period or date of last payment, whichever occurs first. All Grantees and Sub-grantees must be able to demonstrate and document the actual cost of service provision. The amount billed to the grant cannot exceed the actual cost of providing the service.

Personnel Activity Reports. The distribution of salaries and wages to awards must be supported by personnel activity reports. Reports reflecting the distribution of activity of each employee must be maintained for all staff members (professionals and nonprofessionals) whose compensation is charged, in whole or in part, directly to awards.

Moreover, HUD would expect all new entities, including SHFAs new to the program, to provide the same services as required by current participants, including:

- A. Strong knowledge of the requirements and guidelines of HUD's Housing Counseling Program;
- B. Direct technical support to your network on a myriad of counseling question and issues;
- C. Distribution of HUD counseling funds to network agencies;
- D. Investigating, securing and distributing of other funding sources in support of housing counseling activities;
- E. Establishing principals, protocols and requirements for the network subgrantee or affiliates that are consistent with HUD requirements, in addition to individual organization's respective requirement, be they state or national;
- F. Oversight and monitoring of network subgrantees/partners consistent with HUD requirements as well as your organization requirements;
- G. HUD-approved housing counseling agencies receiving \$500,000.00 or more are required to use OMB Circular A-122's guidance concerning reimbursement requirements for costs

incurred under federal grant awards or contracts. Costs are considered as direct or indirect;
and

- H. Training to your respective network counselors on all facets of the HUD's housing counseling program and providing direct technical support to your network on a myriad of counseling question and issues.

HUD's [Housing Capacity Building Toolkit](#) provides a list of key documents and an understanding of HUD's expectation for grantees and agencies participating in HUD's Housing Counseling Program.