

**Juvenile Reentry Assistance Program FY 2015  
Notice of Funding Availability (NOFA) Questions & Answers (Q&A)**

**PART II (updated)**

*In accordance with the HUD Reform Act, HUD cannot provide a determination to questions that ask about a specific situation (e.g. whether something would be eligible or how it would be rated) outside of reviewing a submitted grant application during its formal review process.*

*This Q&A is meant to provide general clarification to the NOFA language.*

**Applicant Eligibility**

Q1. Are Tribally Designated Housing Entities eligible to apply as Public Housing Authorities under the NOFA for the Juvenile Reentry Assistance Program?

A. Under this NOFA, Tribally Designated Housing Entities are not eligible to apply. For this NOFA, a Public Housing Authority is one meeting the definition of Public Housing Agency defined in [24 CFR §905.108](#).

Q2. Are state-aided public housing agencies eligible to apply?

A. Under this NOFA, a Public Housing Agency is one meeting the definition contained in 24 CFR §905.108, which would require the agency to receive federal assistance under part 905.108.

Q3. Is the JRAP Grant only for PHAs within a Promise Zone Designee's jurisdiction? **(new)**

A. No, a PHA is not required to work within a Promise Zone to apply for JRAP funding. Because HUD encourages activities in communities with Preferred Sustainability Status (PSS) and/or Promise Zones (PZ), HUD will award two (2) points for qualified activities within a designated zone or area and supporting either or both initiative(s) (see Section V.A.3. of the NOFA regarding Bonus Points).

**Match**

Q4. If a housing authority requests grant funds of \$100,000, would the match be \$25,000, for a total program cost of \$125,000? **(new)**

A. Yes. Per Section III.B. of the NOFA, in order to be considered for funding, all applicants are required to have in place at the time of grant application a firmly committed match contribution equivalent to 25% of the total grant amount requested. The maximum grant award is \$100,000 (Section II.C.). The required match contribution is not subtracted from the grant award.

## Partnerships

Q5. Section III.C.4.a of the NOFA requires the PHA to partner with a non-profit legal service organization in order to be an eligible applicant. Section III.C.5.iii requires that 93% of the grant funds be “contracted” to the non-profit legal service organization. Is it HUD’s expectation that the partnering non-profit legal services organization be procured in accordance with the requirements of 2 CFR 200? If so, is it HUDs’ expectation that the procurement be completed prior to the establishment of the partnership and negotiation of the Memorandum of Understanding?

- A. Prior to submitting an application, the PHA may enter into a partnership agreement through a Memorandum of Understanding with the nonprofit legal service organization for the provision of eligible activities in response to the JRAP NOFA without following the post-award competitive procurement requirements in 2 CFR 200. Per 2 CFR §200.330 the named MOU-partner could be considered a subrecipient rather than a contractor. *The foregoing notwithstanding, the PHA should ensure it complies with state and local requirements as well as its own procurement policies.*

Q6. Please clarify what is an “other legal service organization” and a list of agencies that may qualify and fall under that definition. **(new)**

- A. “Legal service organization” is defined in the NOFA in the Definitions section (Section I.A.3.vi.)—  
Legal service organization – A community based non-profit organization public or private non-profit organization of demonstrated effectiveness that is representative of a community or significant segments of a community, and provides educational or related services to individuals in the community. These organizations include: law school clinics, bar associations, private non-profit entities who provide legal services, and legal aid or state wide legal services.

## Rating Factors

Q7. Must the program address target youth ages 16-24, or can the program focus on target youth ages 16-20?

- A. While the NOFA provides a maximum age limit of 24 for target youth to be assisted under this program, the NOFA does not require your JRAP to focus on a specific age range. Your JRAP should be responsive to the needs of your potential target youth. The Project Plan, including eligible program activities, that you propose will depend on the state laws and problem (needs) you identify and connecting those to the overarching goals of the program as stated in the NOFA (see also Section V.A.1.d.iii. for the JRAP Project Plan subfactor in the Soundness of Approach Rating Factor).

Q8. In the Section V.A.1.c – Need – Rates of Incarceration & Unemployment, the NOFA states, “it is recommended that applicants include in the table . . . the identification of

neighborhoods with high rates of incarceration and unemployment and a high concentration of HUD public and assisted households.” Given that this NOFA is focusing on youth living in public housing, is it okay to focus our stats on the Housing Authority’s public housing units or must we also include the PHA’s leased housing as well as other non-PHA HUD assisted housing?

- A. In accordance with the HUD Reform Act, HUD cannot provide a determination to questions that ask about a specific situation outside of reviewing a submitted grant application during its formal review process. All applications eligible to be rated will scored based on responses to the rating factors according to the criteria listed in the NOFA in Section V.A.