

**Questions and Answers for
Assisted Housing Oversight Division/OAMPO, Grants and New Funding Branch**

811 PRA NOFO

Q1: Double-spacing appears to be specified (page 37 of the NOFO), up to a 30-page limit. Can you please clarify whether single-spaced submissions will be allowed in this round?

Section IV:C-2 of the NOFO on page 37 states: Narratives and other attachments to your application must follow the following format guidelines. Double spaced 12-point (minimum) Times Roman font on letter sized paper (8 1/2 x 11 inches) with at least 1-inch margins on all sides.

Q2: Where can I find the primary recipient of the grant for my state.

This information can be found at <https://www.hudexchange.info/programs/811-pra/pra-program-grantees-and-awards/>.

Q3: Can information be provided for three separate state housing agency co-applicants via an excel file or must each project award be listed separately?

If you are partnering with another housing agency as a co-applicant, all parties to the application must describe their program experience with the details discussed in Section V: A-1 and include a joint letter, agreement or Memorandum of Understanding (MOU) to the application. (Section V: A-1 on page 46 of the NOFO)

Q4: If most of our funding is provided in the form of BMIR loans and tax credits, do we only list the grant programs on the application?

No, all sources of funding must be listed separately on the application.

Q5: Does the Implementation Plan (Rating Factor 3 narrative response) count towards the 30-page narrative response limit?

Yes, the conclusion of this stand-alone narrative will count towards the 30-page submission limit.

Q6: If with an existing allocation of 811 PRA are applying for new rental assistance, can they shift their existing target populations so there is just one system for the old and new rental assistance?

The 811 PRA funds for each funding year and each grant should be accounted for separately, however, HUD does not dictate the system that a grantee uses to administer the grants.

Q7: Under the 811 PRA grant can we admit persons with criminal conviction records outside of those who are subject to a lifetime sex offender registry and those who have been convicted of manufacturing methamphetamine on the premises of federally subsidized housing?

The project owner is responsible for preventing crime in 811 PRA assisted units, including the denial of admission to persons engaged in criminal activity or has certain criminal histories, in accordance with 24 CFR part 5, subpart H.

Q0: Are housing providers prohibited from adding additional screening criteria to HUD's minimum screening?

Applicants may identify specific targeted populations of persons with disabilities (e.g., persons who are institutionalized, at serious risk of institutionalization, homeless, or at risk of homelessness). Any additional screening criteria must be consistent with all applicable requirements, including 24 CFR part 5 and Fair Housing and Civil Rights laws and regulations, and affirmative marketing requirements. See FHEO's Guidance on Compliance with Title VI in Marketing and Application Processing for additional information about marketing, application procedures, applicant screening, and waitlist management. Please also refer to Chapter 4 of the Occupancy Requirements of Subsidized Multifamily Housing Programs (4350.3) handbook for additional guidance on screening.

Q8: We are trying to address racial equity and reaching out to individuals who are least likely to apply as part of our application. Are we able to prioritize these individuals over others in our referral procedures? Additionally, is this something we are able to outline in our Interagency Partnership Agreement?

All methods of outreach and referral and management of the waiting list must be consistent with Fair Housing and Civil Rights laws and regulations, and affirmative marketing requirements. See FHEO's Guidance on Compliance with Title VI in Marketing and Application Processing for additional information about marketing, application procedures, applicant screening, and waitlist management. Please also refer to Chapter 4 of the Occupancy Requirements of Subsidized Multifamily Housing Programs (4350.3) handbook for additional guidance on screening.

Q9: Under Applicant's Relevant Experience, Capacity, and Readiness (Page 46), some criteria ask about the applicant, co-applicant, and any other participants. Is this limited to the HFA and the State Health and Human Services/Medicaid Agency? Or should all parties to the Interagency Partnership Agreement be included?

All parties to the Interagency Partnership Agreement must describe their respective housing program experience. All participants should demonstrate recent (within five (5) years) and relevant experience directly related to the financing and management of affordable multifamily

housing units, particularly those units that house people with disabilities, and compliance with Section 504 accessibility requirements.

Q1: In the NOFO, does the term “Abstract” and the 7-page limit both refer to the entire narrative to address Rating Factor 1? Or are some parts of the response to Rating Factor 1 not included in the Abstract?

No, the Abstract content required is only part of the response needed for Rating Factor 1. Please refer to the Rating Criteria for Factor 1 on pages 45-48 of the NOFO for a detailed description of all that is required.

Q2: The section Format and Form (Page 37) states, “Application must not exceed 30 pages” and “30 Pages maximum length of narratives”. Is the 30-page requirement for all narratives combined, or for each narrative?

The complete application may not exceed 30 pages total, other than for supporting documentation.

Q3: The section Applicant(s)'s Description of Relevant Experience (Page 46) asks twice about experience providing supportive housing for people with disabilities. The second ask is in the last line. Is that ask specifically referring to the Advancing Racial Equity section?

No, the requirement of the Advancing Racial Equality narrative should address all four bullets outlined on page 30 of the NOFO under the Advancing Racial Equity Requirement section. Applicants should provide their response in Attachment A. This narrative will not count toward the 30-page limit; however, this narrative must not exceed 1 page. This is a mandatory requirement. The Description of Relevant Experience requested on page 46 of the NOFO outlines the detailed requirements for that Rating Factor.

Q4: Is the cooperative agreement available for review now? If so, where is that found?

Cooperative Agreements are drafted and executed each funding year and are subject to revision each year. You may find a Cooperative Agreement for the previous funding cycle at the following link: [PRA Program Cooperative Agreement - HUD Exchange](#) Again, the provisions of the document found at the link are subject to revision. Grantees who are awarded funding via this funding round will have the opportunity to view the Cooperative Agreement before accepting the award.

Q5: Are eligible properties limited to only LIHTC properties? Is it strongly encouraged to contract with properties where highly vulnerable populations with limited resources can access local services/public transportation/etc.?

No, Eligible properties are NOT limited to only LIHTC properties. Please see page 49 of the NOFO for information regarding property selection criteria.

Q16: Can a tenant's rent contribution exceed 30% post move in?

No, the tenant's rent contribution shall be 30 percent of the family's adjusted monthly income, as determined through an income re-certification as described in 24 CFR 891.610.

Q17: Regarding past performance, can you clarify what reporting period will be used to determine performance?

HUD will use the most recent quarterly or annual reporting data and any existing criteria or information in evaluating an Applicant's past performance or past non-compliance available at the time of application closing. See Section III. D. 4. Data related to any FY 19 Awards will NOT be used to determine past performance.

Q18: Rating Factor 2: can you provide examples of what HUD considers documentation rather than just description?

There is no specific documentation we can recommend for this factor. The applicant must describe and document how this funding will address a specific housing need for extremely low-income persons with disabilities who are eligible for services from Medicaid or another similar program in the applicant's state. In addition to statistical data to quantify the need related to the target population(s), one must describe how this funding will address a specific issue or issues, or fill a gap in a state's existing continuum of services for persons with disabilities, such as a particular program issue that the state has been attempting to solve beyond its basic need for affordable housing for persons with disabilities. Please refer to the Rating Factor 2 description on page 48 of the NOFO for additional information.

Q19: For Rating Factor 1 Experience Requirements, can we put our applicant and co-applicant program descriptions in a separate attachment.

No, if you are partnering with another housing agency as a co-applicant, you must describe the co-applicant's program experience with the details discussed in Section V.A.1 on page 46 of the NOFO and include a joint letter, agreement or Memorandum of Understanding (MOU) to the application.

Q20: You mentioned a desire to have units occupied within 18 months of signing the Cooperative Agreement. What if we're working with newly funded projects which may not be placed in service for another 18+ months?

HUD seeks to fund programs that will begin identifying units within 6 months and the leasing of units within 18 months after execution of a Cooperative Agreement. Applicants should be reasonable in setting milestones and take into consideration factors such as construction periods, unit turnover, transitioning of residents, and other factors that might impact the timely occupancy

of units. If units are occupied in Year 2 of the program, the Implementation Schedule will extend to year 6 to allow for the full 5 years of funding per unit in the program. This schedule will be incorporated into the Cooperative Agreement with HUD. Any program funds not utilized as outlined in the Implementation Plan and Schedule are subject to rescission as described in 2 CFR 200.339.

Q. If with an existing allocation of 811 PRA are applying for new rental assistance, can they shift their existing target populations so there is just one system for the old and new rental assistance?

A. *A: HUD understands that program modifications, including changes in target population, may be necessary from time to time. Changes in a grantee's Program Description or Interagency Partnership Agreement may be made at the discretion of the grantee, and must be reported in writing to HUD. In no event may the changes made to the Cooperative Agreement be in conflict with HUD's statutory, regulatory, or administrative requirements.*

Q21: For the AFFH items, we only need to cover 2 of the items listed, correct?

No, you must submit a narrative demonstrating that the housing, services, or other benefits provided under this grant will be affirmatively marketed broadly throughout the local area and nearby areas to any demographic groups that would be unlikely or least likely to apply absent such efforts. Please refer to Section III.F.1 page 20 of the NOFO for additional guidance.

Q22: Are we able to prioritize LEP applicants?

No, all methods of outreach and referral and management of the waiting list must be consistent with Fair Housing and Civil Rights laws and regulations, and affirmative marketing requirements. See FHEO's Guidance on Compliance with Title VI in Marketing and Application Processing for additional information about marketing, application procedures, applicant screening, and waitlist management.

Q23: How strict are you on identifying the units that will be selected within 6 months? The state housing finance agency will not be selecting new 9% LIHTC developments until the end of the year. Will that make them ineligible?

HUD seeks to fund programs that will begin identifying units within 6 months and the leasing of units within 18 months after execution of a Cooperative Agreement. HUD will evaluate applications in this rating sub-factor based on the milestones that need to be accomplished to develop this program. Your application does not have to identify SPECIFIC properties or SPECIFIC units at the time of application.

Q24: When is it expected for the grant results to be announced?

At this time, HUD does not have that information of when the awards for the grant will be announced. Once selected the awardees will be notified via public press release which can be located on hud.gov.

Q25: Is "low performance" defined?

No, low performance is not defined in the NOFO. However, HUD will use the most recent quarterly or annual reporting data and any available existing criteria or information in evaluating an Applicant's past performance or past non-compliance available at the time of application closing.

Q26: Could you provide more guidance on the Fair Housing and Racial equity requirements. After reviewing the NOFO a few times I'm still confused where this information should go. For instance, in the NOFO Rating Factor section, under Tab 3, (F), you note an AFFH section for 1 point and note that this response should be 1 page -- is this considered part of the 30-page limit or is this considered an attachment narrative. How many fair housing narratives do we need to have separately?

An applicant will submit responses to this requirement under the Soundness of Approach - Factor 3. Please limit your response to 1 page. The inclusion of this narrative will not count

towards the 30-page submission limit. Please refer to Section V Rating Factor 3 on pages 48-49 of the NOFO.

Q27: Page 10 of the Administrative, National, and Department Policy Requirements and Terms for HUD's Financial Assistance Programs says the following "HUD does not collect or review state codes of conduct for compliance with 2 CFR 200.318(c)." Just want to confirm we should ignore this and submit codes of conduct anyway.

Yes, HUD maintains a list of organizations that have previously submitted written standards of conduct on its Code of Conduct for HUD Grant Programs webpage. But it is your responsibility to ensure that the standards are compliant with the noted requirements and that HUD has the latest version of the written standards. Updated written standards should be submitted with the application. Any updates to your written standards, after the application period, should be submitted as directed by the HUD program contact for this NOFO.

Q28: The rental assistance cannot be used on a privately financed property, correct?

Rental assistance can be used on a privately financed property. An eligible property means any new or existing property owned by a non-profit or a *private entity*. [insert citation to applicable NOFO section] The property must contain at least five (5) units of housing. [insert citation to applicable NOFO section] The cost to develop a new property must be paid with other public or private resources. Section 811 PRA funds may not be used to develop these properties. Properties with existing use restrictions for persons with disabilities are not eligible, unless such Section 811 PRA funds are being used to support other units in the building without such restrictions.