



U.S. Department of Housing and Urban Development

Office of Housing

FY23 NOFO Housing Counseling Training Grant Program

FR-6700-N-30

11/30/2023

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Office of Housing

Funding Opportunity Title:

FY23 NOFO Housing Counseling Training Grant Program

Funding Opportunity Number:

FR-6700-N-30

Assistance Listing Number (formerly CFDA Number):

14.316

Due Date for Applications:

11/30/2023

OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) issues this Notice of Funding Opportunity (NOFO) to invite applications from eligible applicants for the program and purpose described within this NOFO. You, as a prospective applicant, should carefully read all instructions in all sections to avoid sending an incomplete or ineligible application. HUD funding is highly competitive. Failure to respond accurately to any submission requirement could result in an incomplete or noncompetitive proposal.

In accordance with [Title 24 part 4, subpart B](#) of the Code of Federal Regulations (CFR), during the selection process (which includes HUD's NOFO development and publication and concludes with the award of assistance), HUD is prohibited from disclosing covered selection information. Examples of impermissible disclosures include: 1) information regarding any applicant's relative standing; 2) the amount of assistance requested by any applicant; and 3) any information contained in the application. Prior to the application deadline, HUD may not disclose the identity of any applicant or the number of applicants that have applied for assistance.

For further information regarding this NOFO, direct questions regarding the specific requirements of this NOFO to the agency contact identified in section VII.

Paperwork Reduction Act Statement. In accordance with the Paperwork Reduction Act of 1995 (44 U.S.C. 3501- 3520) (PRA), the Office of Management and Budget (OMB) approved the information collection requirements in this NOFO. HUD may not conduct or sponsor, and a person is not required to respond to a collection of information unless the collection displays a valid OMB control number. This NOFO identifies its applicable OMB control number, unless its collection of information is excluded from these requirements under [5 CFR part 1320](#).

OMB Approval Number(s):

2502-0567

I. FUNDING OPPORTUNITY DESCRIPTION

A. Program Description

1. Purpose

The purpose of this NOFO assistance is to continue investing in the creation and maintenance of a professional and effective housing counseling industry that is able to meaningfully assist consumers by providing them with the information they need to make informed housing choices and maximize the impact of Federal funding appropriated for HUD's Housing Counseling Program.

Statutory requirements enacted as part of the Dodd–Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) require that individual housing counselors participating in HUD’s Housing Counseling Program shall demonstrate, by written examination, that they are competent in providing counseling in each of the core topics provided at section 106(e)(2) of the Housing and Urban Development Act of 1968 (Section 106) (12 U.S.C. 1701x(e)(2)). HUD published the Final Rule implementing Housing Counseling Certification requirements on December 14, 2016, at 81 FR 90632. A revision of the certification timeline was later published in a Final Rule on December 4, 2020, at 85 FR 78230. The 2016 rule implements the statutory requirement that housing counseling required under or provided in connection with all HUD programs must be provided by a HUD-certified counselor employed by a Participating Agency. HUD requires six (6) Core Topics in which housing counselors need to be trained and competent. These are: Financial Management; Property Maintenance; Home ownership and Tenancy; Fair Housing and other Civil Rights Laws and Requirements; Housing Affordability; Avoidance of, and responses to, rental and mortgage delinquency and avoidance of eviction and mortgage default.

2. HUD and Program-Specific Goals and Objectives

This NOFO supports [HUD’s Strategic Plan for Fiscal Years \(FY\) 2022-2026](#) to accomplish HUD’s mission and vision. Each of the five goals in the [Strategic Plan](#) include what HUD hopes to accomplish, the strategies to accomplish those objectives, and the indicators of success. However, of the five goals only those applicable to this NOFO are identified below.

You are expected to align your application to the applicable strategic goals and objectives below. Use the information in this section to describe in your application the specific goals, objectives, and measures that your project is expected to help accomplish. If your project is selected for funding, you are also expected to establish a plan to track progress related to those goals, objectives, and measures. HUD will monitor compliance with the goals, objectives, and measures in your project.

Applicable Goals and Objectives from HUD’s Strategic Plan

1. Strategic Goal 1: Support Underserved Communities

Fortify support for underserved communities and support equitable community development for all people.

2. 1A: Advance Housing Justice

Fortify support for vulnerable populations, underserved communities, and Fair Housing enforcement.

3. 1B: Reduce Homelessness

Strengthen Federal, State, Tribal, and community implementation of the Housing First approach to reducing the prevalence of homelessness, with the ultimate goal of ending homelessness.

4. 1C: Invest in the Success of Communities

Promote equitable community development that generates wealth-building for underserved communities, particularly for communities of color.

5. Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing

Ensure housing demand is matched by adequate production of new homes and equitable access to housing opportunities for all people.

6. 2A: Increase the Supply of Housing

Enhance HUD's programs that increase the production and supply of housing across the country.

7. 2B: Improve Rental Assistance

Improve rental assistance to address the need for affordable housing.

8. Strategic Goal 3: Promote Homeownership

Promote homeownership opportunities, equitable access to credit for purchase and improvements, and wealth-building in underserved communities.

9. 3A: Advance Sustainable Homeownership

Advance the deployment of tools and capital that put sustainable homeownership within reach.

10. 3A ♦ Major Initiative: Expand Homeownership Opportunities

Promote financing for innovative ownership models to increase the availability of affordable housing.

11. 3B: Create a More Accessible and Inclusive Housing Finance System

Advance new policy, programs, and modernization initiatives that support a more equitable housing finance system. Promote the preservation and creation of affordable housing stock.

12. Strategic Goal 4: Advance Sustainable Communities

Advance sustainable communities by strengthening climate resilience and energy efficiency, promoting environmental justice, and recognizing housing's role as essential to health.

13. 4A: Guide Investment in Climate Resilience

Invest in climate resilience, energy efficiency, and renewable energy across HUD programs.

14. 4B: Strengthen Environmental Justice

Reduce exposure to health risks, environmental hazards, and substandard housing, especially for low-income households and communities of color.

15. 4C: Integrate Health and Housing

Advance policies that recognize housing's role as essential to health.

Objectives and Priorities of this TNOFO

The objective and priorities of this TNOFO include, but are not limited to:

1. Distributing Federal financial support to eligible housing counseling agencies to enable them to provide training to housing counselors to provide quality services to consumers.
2. Encouraging housing counselor workforce development through programs designed to prepare students for future careers in housing counseling. These programs can be administered directly by Training NOFO (TNOFO) grantees, or by partnering with institutions of higher education, including but not limited to, Historically Black Colleges or Universities (HBCUs), Tribal Colleges and Universities (TCUs), or other Minority Serving Institutions (MSIs).
3. Distributing Federal financial support to eligible housing counseling agencies based on past performance.
4. Supporting Housing Counseling agencies (HCAs) that are in a unique position to help their communities prepare for and recover from a disaster. They can help their clients prepare for disasters by integrating preparedness into their counseling and education activities. Post-disaster, they can use their knowledge of local resources and programs to help clients navigate the complexities of disaster recovery resources and programs.

5. Providing specialized training in specific housing counseling topics to counselors that will need more than general housing counseling training to provide high quality services.
6. Supporting the provision of both basic and specialized topics of housing counseling training including the core topics for housing counselor certification, rental housing counseling, mortgage delinquency and default counseling, housing counselor workforce development, and disaster preparation and recovery to help meet these perceived needs.
7. Providing financial support that will assist HCAs to increase the use of partnerships with local and state-wide organizations to provide additional place-based training on state and local issues. In addition, this support should result in an increased number of counselor training scholarships.

Funding Opportunity Goals

The goals of this funding opportunity include, but are not limited to:

1. Providing financial support to increase HCAs use of partnerships with local and state-wide organizations to provide additional place-based training on state and local issues, in order to create an increased number of counselor training scholarships.
2. Supporting the provision of both basic and specialized topics of housing counseling training including the core topics for housing counselor certification, rental housing counseling, mortgage delinquency and default counseling, housing counselor workforce development, and disaster preparation and recovery to help meet these perceived needs.
3. Supporting Housing Counseling agencies (HCAs) that are in a unique position to help their communities prepare for and recover from a disaster. This can be done by integrating preparedness into their counseling and education activities. Post-disaster, they can use their knowledge of local resources and programs to help clients navigate the complexities of disaster recovery resources and programs.
4. Encouraging housing counselor workforce development through programs designed to prepare students for future careers in housing counseling. These programs can be administered directly by Training NOFO (TNOFO) grantees, or by partnering with institutions of higher education, including but not limited to, Historically Black Colleges or Universities (HBCUs), Tribal Colleges and Universities (TCUs), or other Minority Serving Institutions (MSIs).

3. Changes from Previous NOFO

Transfer from DUNS Number to UEI.

HUD no longer recognizes the Data Universal Number System (DUNS) identifier previously assigned by Dun & Bradstreet to each business or organization. As of April 4, 2022, the Federal government has transitioned from the use of the DUNS Number to the use of the Unique Entity Identifier (UEI) assigned by SAM as the primary means of entity identification for Federal awards government-wide.

New or Revised Program Definitions:

Eligible Training Recipients:

1. Counselors and staff employed by housing counseling agencies participating in HUD's Housing Counseling program;

2. Individuals enrolled in workforce development training programs, including military veterans and transitioning service members, administered by the TNOFO grantee. Individuals must be sponsored by a HUD participating housing counseling agency to qualify; and
3. Additional funds may be available to persons enrolled in a HUD certified housing counselor workforce development program sponsored by the TNOFO grantee and an institution of higher education including, but not limited to, an HBCU, TCU, or other MSI.

Training Consultant: An added definition for a third-party individual who is contracted to provide training and/or course development.

Training Partners: In addition to government agencies and/or non-profit organizations, these may also include for profit organizations with two years of experience providing housing counselor training. Training Partners that are only providing support services, venues, or other logistical support do not have to meet the two-year experience requirement providing housing counseling training.

New Eligible Activities:

Home Ownership Counseling (from 24 CFR 5.100): Housing counseling related to home ownership and residential mortgage loans when provided in connection with HUD's Housing Counseling Program, or required by or provided in connection with HUD Programs as defined in 24 CFR 5.111. Home ownership counseling is housing counseling that covers the decision to purchase a home, the selection and purchase of a home, issues arising during or affecting the period of ownership of a home (including financing, refinancing, default, and foreclosure, and other financial decisions) and the sale or other disposition of a home.

Resolving or Preventing Mortgage Delinquency or Default: Train counselors on the consequences of default and foreclosure; loss mitigation, budgeting and credit; restructuring debt; importance of paying property taxes; obtaining re-certification for a mortgage subsidy; and establishing reinstatement repayment plans. It may also include assisting clients affected by predatory lending; foreclosure prevention strategies; national emergencies or disasters; and explaining the foreclosure process; impacted by disaster, providing referrals to other sources; and assisting clients with locating alternative housing. This training should include information necessary to obtain an understanding of governmental mortgage insurance and guarantee programs. Furthermore, instruction must be provided on various types of insurance products such as hazard insurance, flood insurance, etc.

Military Veterans Homelessness: Train counselors about the unique aspects of military veterans' homelessness. Discuss the various social services available for homeless military veterans, including HUD-VASH, which is a collaborative program that pairs HUD's Housing Choice Voucher (HCV) rental assistance with case management and supportive services from the U.S. Department of Veterans Affairs. This training should include information on how to apply for benefits from the U.S. Department of Veterans Affairs (VA) and Social Security Administration (SSA); and find permanent housing.

Disaster Assistance Counseling in the Response Period: Train counselors to assist clients dealing with post disaster issues and problems in the aftermath of a disaster. Includes post disaster assistance housing counseling and education. It can be group education or one-on-one counseling. Counselors need to understand disaster recovery programs from various agencies such as HUD (Section 8, FHA insured mortgage financing (e.g., Sections 203(h) and 203(k) programs, forbearance, foreclosure and/or eviction moratorium policies), Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), United States Department of Agriculture (USDA), Government-Sponsored Enterprises (GSEs), and others. Counselors also need to understand homeowners and flood insurance requirements and policies. Counselors need to be prepared to work with highly stressed clients and staff.

Disaster Counseling Certification: Design, develop, and administer a disaster housing counseling certification program that is designed to prepare counselors to provide disaster housing counseling after local, state or national emergency or disaster. from FEMA support to FEMA disaster teams and facilities as requested. Support can be on-site or virtual. Specialized courses from OHC, FEMA, SBA and other federal agencies should be required for the certification.

Counseling on Energy Efficiency: Train housing counselors about the role of energy efficiency in boosting housing affordability and improving health, safety, and comfort. Discuss how home energy assessments may help counseling clients make informed decisions about energy efficiency activities. Review low and no cost actions and adjustments clients can make to lower energy costs, as well as home maintenance. Discuss programs available for financing energy efficient improvement, including FHA and conventional products.

Property Appraisal and Valuation Equity (PAVE): Train counselors to understand Racial appraisal bias in home property valuation. This training should include discussions of the strategies to combat appraisal bias, as well as resources counselors can access to support individuals who have been impacted. There should be discussion of how Fair Housing Initiatives Program (FHIP)/Fair Housing Assistance Program (FHAP) organizations and housing counseling agencies (HCAs) can combine efforts to combat appraisal bias. Recommendations and best practices for counseling clients and individuals who have been impacted by appraisal bias should be included.

Marketing Your Agency: Train counselors about the tools and techniques available for successful marketing of agency housing counseling services. OHC marketing strategies and National Awareness campaign should be included.

Dealing with Stress, Trauma, and Mental Health: Train counselors to recognize stress, trauma and the signs of mental health issues and refer clients to the appropriate resources for assistance.

Ethics in Counseling: This training should include the ethical responsibility of housing practitioners and HCAs. Discuss the HUD Housing Counseling Program requirements, standards and policies in detail. Discuss the possible risk of conflict of interest when referring clients to other housing professionals. Trainees should have a clear understanding of the importance of client disclosure forms. Lastly, recognize a framework of critical thinking to navigate through scenarios that may question the ethical portion of housing counseling programs.

Application Charts:

No changes were made to the application charts. The application charts, Form HUD-92910, approved by OMB on November 20, 2020, has an expiration date of November 30, 2023. Approval will be renewed prior to November 30, 2023

Changes to Rating Factors:

Rating Factor 3:

- Scholarships (RF3,A)- Describe in a narrative the number of scholarships and percentage of the HUD Housing Counseling Program Training grant was spent on travel, lodging, and/or tuition during the FY 2021 Grant Period of October 1, 2021 through September 30, 2022. If the Applicant did not expend HUD Housing Counseling Program Training grant funds during this time period, provide this information based on the applicant's entire training budget for the same period. If applicable, explain any adjustments made to allocation of scholarships based on changed needs. Also include the number and type of counseling scholarships issued for housing counseling certification, HECM default counseling, Disaster Prevention and Recovery, and scholarships issued to persons enrolled in a HUD-certified Housing Counselor Workforce Development Program sponsored by the TNOFO grantee and an institution of higher education including, but not limited to, an HBCU, TCU or other MSI made available during the grant period of performance July 1, 2021 through September 30, 2022, if applicable.

Proposed Funding Methodology:

Applications that earn a score of seventy-five (75) points or more will receive a base amount, as determined by HUD. The second tier of funding will be based on the total number of HUD scholarships awarded in FY2021 Grant Period of October 1, 2021 to December 31, 2022. The third tier of funding will be based on the total number of classes provided for the same period. The fourth tier of funding will be based on the proposed number of HUD scholarships for institutions of higher education including, but not limited to, an HBCU, TCU or other MSI.

4. Definitions

a. Standard Definitions

Affirmatively Furthering Fair Housing (AFFH) means taking meaningful actions, in addition to combating discrimination to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunities, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all program participant's activities and programs relating to housing and urban development.

Assistance Listing number refers to the unique number assigned to each Federal assistance program publicly available in the Assistance Listing, which is managed and administered by the General Services Administration. The Assistance Listing number was formerly known as the Catalog of Federal Domestic Assistance (CFDA) number.

Authorized Organization Representative (AOR) is a person authorized to legally bind your organization and submit applications via Grants.gov. The AOR is authorized by the E-Business Point of Contact (E-Biz POC) in the System for Award Management (see E-Biz POC definition). An AOR may include an Expanded AOR and/or a Standard AOR.

Expanded Authorized Organization Representative is a user in Grants.gov who is authorized by the E-Biz POC to perform the functions of a Standard AOR, initiate and submit applications on behalf of your organization, and is allowed to modify organization-level settings and certifications in Grants.gov.

Standard Authorized Organization Representative is a user in Grants.gov who is authorized by the E-Biz POC to initiate and submit applications in Grants.gov. A Grants.gov user with the Standard AOR role can only submit applications when they are a Participant for that workspace.

Consolidated Plan is the document submitted to HUD that serves as the comprehensive housing affordability strategy, community development plan, and submission for funding under any of the Community Planning and Development formula grant programs (e.g., CDBG, ESG, HOME, and HOPWA). This Plan is prepared in accordance with the process described in [24 CFR part 91](#). This plan is completed by engaging in a participatory process to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions with funding from formula grant programs. (See [24 CFR part 91](#) for HUD's requirements regarding the Consolidated Plan and related Action Plan).

Contract means, for the purpose of Federal financial assistance, a legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a federal award. For additional information on contractor and subrecipient determinations, see [2 CFR 200.331](#).

Contractor means an entity that receives a contract as defined above and in [2 CFR 200.1](#).

Cooperative agreement has the same meaning defined at [2 CFR 200.1](#).

Deficiency, with respect to the making of an application for funding, is information missing or omitted within a submitted application. Examples of deficiencies include missing documents, missing or incomplete information on a form, or some other type of unsatisfied information requirement. Depending on specific criteria, a deficiency may be either Curable or Non-Curable.

A Curable Deficiency is missing or incomplete application information that may be corrected by the applicant with timely action. To be curable, the deficiency must:

- Not be a threshold requirement, except for documentation of applicant eligibility;
- Not influence how an applicant is ranked or scored versus other applicants; and
- Be remedied within the time frame specified in the notice of deficiency.

A Non-Curable Deficiency is missing or incomplete application information that cannot be corrected by an applicant after the submission deadline. A non-curable deficiency is a

deficiency that is a threshold requirement, or a deficiency that, if corrected, would change an applicant's score or rank versus other applicants. If an application includes a non-curable deficiency, the application may receive an ineligible determination, or the non-curable deficiency may otherwise adversely affect the application's score and final funding determination.

E-Business Point of Contact (E-Biz POC) is an organization applicant who is responsible for the administration and management of grant activities for his or her organization. The E-Biz POC is likely to be an organization's chief financial officer or authorizing official. The E-Biz POC authorizes representatives of their organization to apply on behalf of the organization (see Authorized Organization Representative definition). There can only be one E-Biz POC per unique entity identifier (see definition of Unique Entity Identifier below).

Eligibility requirements are mandatory requirements for an application to be eligible for funding.

Environmental Justice means investing in environmental improvements, remedying past environmental inequities, and otherwise developing, implementing, and enforcing laws and policies in a manner that advances environmental equity and provides meaningful involvement for people and communities that have been environmentally underserved or overburdened, such as Black and Brown communities, indigenous groups, and individuals with disabilities. This definition does not alter the requirements under HUD's regulations at [24 CFR 58.5\(j\)](#) and [24 CFR 50.4\(l\)](#) implementing [Executive Order 12898](#). E.O. 12898 requires a consideration of how federally assisted projects may have disproportionately high and adverse human health or environmental effects on minority and/or low-income populations. For additional information on environmental review compliance, refer to:

https://www.hud.gov/program_offices/comm_planning/environment_energy/regulations.

Equity has the meaning given to that term in Section 2(a) of Executive Order [13985](#) and means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Federal Award, has the meaning, depending on the context, in either paragraphs (1) or (2) of this definition:

(1)

(a) The Federal financial assistance that a recipient receives directly from a Federal awarding agency or a subrecipient receives indirectly from a pass-through entity, as described in [2 CFR 200.101](#); or

(b) The cost-reimbursement contract under the Federal Acquisition Regulations that a non-Federal entity receives directly from a federal awarding agency or indirectly from a pass-through entity, as described in [2 CFR 200.101](#).

(2) The instrument setting forth the terms and conditions. The instrument is the grant agreement, cooperative agreement, other agreement for assistance covered in paragraph (2)

of the definitions of Federal financial assistance in [2 CFR 200.1](#), and this NOFO, or the cost-reimbursement contract awarded under the Federal Acquisition Regulations.

(3) Federal award does not include other contracts that a Federal agency uses to buy goods or services from a contractor or a contract to operate Federal Government owned, contractor operated facilities (GOCOs).

(4) See also definitions of Federal financial assistance, grant agreement, and cooperative agreement in [2 CFR 200.1](#).

Federal Financial Assistance has the same meaning defined at [2 CFR 200.1](#).

Grants.gov is the website serving as the Federal government's central portal for searching and applying for Federal financial assistance throughout the Federal government. Registration on Grants.gov is required for submission of applications to prospective agencies unless otherwise specified in this NOFO.

Green and Resilient Building Standard means an industry-recognized standard incorporating both:

(1) Certification under (i) Enterprise Green Communities, (ii) Leadership in Energy and Environmental Design (LEED) (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development), (iii) International Code Council (ICC)-700 National Green Building Standard Green+ Resilience; or the (iv) Living Building Challenge, or (v) a regional standard such as Earth Advantage New Homes; or any other equivalent comprehensive green building program acceptable to HUD; and

(2) Minimum energy efficiency requirements, such as those defined in (i) ENERGY STAR (Certified Homes or Multifamily High-Rise), (ii) DOE Zero Energy Ready Home; (iii) regional or local certifications such as EarthCraft House, EarthCraft Multifamily; Greenpoint Rated New Home, Greenpoint Rated Existing Home (Whole House or Whole Building label); (iv) Passive House Institute Passive Building or EnerPHit certification from the Passive House Institute US (PHIUS), International Passive House Association.

Historically Black Colleges and Universities (HBCUs) are any historically Black college or university that was established prior to 1964, whose principal mission was, and is, the education of Black Americans, and that is accredited by a nationally recognized accrediting agency or association determined by the Secretary of Education to be a reliable authority as to the quality of training offered or is, according to such an agency or association, making reasonable progress toward accreditation. [A list of accredited HBCUs can be found at the U.S. Department of Education's website.](#)

Minority-Serving Institutions (MSIs) are

(1) a part B institution (as defined in [20 U.S.C. 1601](#));

(2) a Hispanic-serving institution (as defined in [20 U.S.C. 1101a\(5\)](#));

(3) a Tribal College or University (as defined in [20 U.S.C. 1059c](#));

(4) an Alaska Native-serving institution or a Native Hawaiian-serving institution (as defined in [20 U.S.C. 1059d\(b\)](#));

(5) a Predominantly Black Institution (as defined in [20 U.S.C. 1059e](#));

(6) an Asian American and Native American Pacific Islander-serving institution (as defined in [20 U.S.C. 1059g](#)); or

(7) a Native American-serving nontribal institution (as defined in [20 U.S.C. 1059f](#)).

Non-Federal Entity (NFE) means a state, local government, Indian tribe, Institution of Higher Education (IHE), or non-profit organization that carries out a federal award as a recipient or subrecipient.

Primary Point of Contact (PPOC) is the person who may be contacted with questions about the application submitted by the AOR. The PPOC is listed in item 8F on the SF-424.

Racial Equity is the elimination of racial disparities, and is achieved when race can no longer predict opportunities, distribution of resources, or outcomes – particularly for Black and Brown persons, which includes Black, Latino, indigenous, Native American, Asian, Pacific Islander, and other persons of color.

Recipient means an entity, usually but not limited to non-Federal entities, that receives a federal award directly from HUD. The term recipient does not include subrecipients or individuals that are beneficiaries of the award.

Resilience is a community’s ability to minimize damage and recover quickly from extreme events and changing conditions.

Small business is defined as a privately-owned corporation, partnership, or sole proprietorship that has fewer employees and less annual revenue than regular-sized business. The definition of “small”—in terms of being able to apply for government support and qualify for preferential tax policy—varies by country and industry. The U.S. Small Business Administration defines a small business according to a set of standards based on specific industries. See [13 CFR Part 121](#).

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient means an entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a federal award but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency.

System for Award Management (SAM) is the Federal Repository into which an entity must provide information required for the conduct of business as a recipient. Registration with SAM is required for submission of applications via Grants.gov. You can access the website at <https://www.sam.gov/SAM/>. There is no cost to use SAM.

Threshold Requirements are eligibility requirements that must be met for an application to be reviewed, rated, and ranked. Threshold requirements are not curable, except for documentation of applicant eligibility, which are listed in Section III.D., Threshold Eligibility Requirements. Similarly, there are eligibility requirements under Section III.E., Statutory and Regulatory Requirements Affecting Eligibility.

Underserved Communities has the meaning given to that term in Section 2(b) of Executive Order [13985](#) and refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the definition of “equity” above.

Unique Entity Identifier (UEI) means the identifier assigned by SAM to uniquely identify business entities. As of April 4, 2022, the Federal government has transitioned from the use of the DUNS Number to the use of UEI, as the primary means of entity identification for Federal awards government-wide.

b. Program Definitions.

HUD-Approved Housing Counseling Agencies. HUD-approved HCAs are private and public nonprofit organizations that are exempt from taxation under section 501(a) pursuant to section 501(c) of the Internal Revenue Code of 1996, 26 U.S.C. 501(a) and 501(c), and approved by HUD, in accordance with HUD Handbook 7610.1 REV-5 and 24 CFR Part 214, to provide housing counseling services to clients directly, or through their affiliates or branches, and which meet the requirements set forth in this part.

Eligible Training Recipients:

1. Counselors and staff employed by HCAs participating in HUD’s Housing Counseling Program;
2. Individuals enrolled in workforce development training programs, including veterans and transitioning service members, administered by the TNOFO Grantee. Individuals must be sponsored by a HUD Participating Agency to qualify; and
3. Additional funds may be available to persons enrolled in a HUD-certified Housing Counselor Workforce Development program sponsored by the TNOFO Grantee and an institution of higher education including an HBCU, TCU, or other MSI.

Trainers. Individuals must have been trained in adult education, have practical experience and subject matter expertise in the specific field they are presenting, and have at least two (2) years of experience providing housing counseling training. Multiple trainers can be used for a single course to fulfill these requirements.

Training Consultant. A third-party individual who provides training or course development, or both.

Training Partners. Agencies and organizations that provide training must have at least two (2) years of experience providing housing counseling training. They may be governmental agencies, for-profit or non-profit organizations. Examples of training partners include state housing finance agencies, state, local and tribal government agencies, housing counseling coalitions and networks, housing industry associations, HUD approved housing counseling agencies and other housing industry partners. Agencies and organizations that are simply providing support services, venues, or other logistical support do not have to meet the two-year experience requirement providing housing counseling training. Participation by training partners shall be limited to services procured by Grantees and Sub-grantees.

B. Authority

HUD's Housing Counseling Program is authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701x) and Section 4(g)(3) of the Department of Housing and Urban Development Act (42 U.S.C. 3533(g)(3) as amended. The Housing Counseling Program regulations are found at 24 CFR 5.100 and 5.111 and 24 CFR part 214. Additional guidance is provided in the HUD Handbook 7610.1, REV-5. Funding for this NOFO is provided by the Consolidated Appropriations Act, 2023 (Public Law 117-328, approved December 29, 2022).

II. AWARD INFORMATION

A. Available Funds

Funding of approximately **\$2,750,000** is available through this NOFO.

Additional funds may become available for award under this NOFO consistent with Section VI.A.2.e., Adjustments to Funding. Use of these funds is subject to statutory constraints. All awards are subject to the funding restrictions contained in this NOFO.

Subject to appropriations, HUD reserves the right to award fiscal year 2024 funds based on this NOFO competition. HUD will use the grant applications received for FY2023 and the corresponding scores and funding methodology to make future awards for FY2024, subject to the availability of appropriations. HUD will contact eligible FY2023 grantees to determine their interest in FY2024 funds, if available.

B. Number of Awards

HUD expects to make approximately 6 awards from the funds available under this NOFO.

C. Minimum/Maximum Award Information

Estimated Total Funding:

\$2,750,000

Minimum Award Amount:

\$0

Per Project Period

Maximum Award Amount:

\$2,750,000

Per Project Period

D. Period of Performance

The initial period of performance for grants awarded under this program will be for a period of twelve (12) months. For planning purposes, Applicants should assume that the period of performance is October 1, 2023 through September 30, 2024.

HUD expects to make approximately six (6) awards from the funds available under this NOFO. HUD may at its discretion, fund a single organization to deliver the full spectrum of activities eligible for funding, or make multiple awards under this NOFO. HUD also reserves the right to not make any awards.

Estimated Project Start Date:

12/20/2023

Estimated Project End Date:

09/30/2024

Length of Project Periods:

12-month project period and budget period

Length of Periods Explanation of Other:

E. Type of Funding Instrument

Funding Instrument Type:

CA (Cooperative Agreement)

HUD expects to use a cooperative agreement. All awards will be made on a cost reimbursement basis in accordance with, and subject to, the requirements in 2 CFR Part 200. If an Applicant receives an award, it must comply with and ensure that sub-recipients also comply with the above requirements.

Awards made under a Cooperative Agreement will entail significant HUD involvement including the following items:

- Review and approval of marketing of courses assistance;
- Work plan changes, including increasing the availability of remote training;
- Review and approval of proposed courses, including course materials;
- HUD may provide Grantees with counseling content standards;
- HUD may provide recommendations for course work, training or other activities that address Departmental initiatives and priorities;
- Review and approval of training locations, technology and logistics. HUD reserves the right to review and approve or reject training locations, technology, and logistics as well as the type of training and courses offered including review to ensure appropriate access is provided for persons with disabilities and persons with limited English proficiency (LEP);
- Review and approval of evaluation instruments and methodology for determining value of courses and impact;
- Identifying functional needs of persons with disabilities or other population groups and outreach techniques; and
- Course audit by HUD staff.

If funds are provided subject to a Cooperative Agreement, HUD may also exercise the right to have substantial involvement by conducting monitoring reviews, requesting quarterly reports, approving all proposed deliverables documented in the Applicant's Work Plan or Statement of Work (SOW), and determining whether the agency meets all certification and assurance requirements.

III. ELIGIBILITY INFORMATION

A. Eligible Applicants

12 (Nonprofits having a 501(c)(3) status with the IRS, other than institutions of higher education)

Additional Information on Eligibility

Non-profit organizations, other than institutions of higher education, are eligible to apply. Applicants must be a public or private non-profit organization and must submit evidence of tax-exempt status under section 501(a) and be an entity described in section 501(c)(3) of the IRC (26 U.S.C. 501(a) and (c)(3)). Applicants must have at least two years of experience providing housing counseling training services nationwide to housing counselors employed by housing counseling agencies participating in HUD's Housing Counseling Program. Applicants are not required to be HUD Approved HCAs.

Applicants may utilize in-house staff, sub-grant recipients, Training Partners (see definition of Training Partners in the instructions for HUD-92910 Chart E and in the definitions section of this NOFO), qualified third-party trainers, and consultants, with requisite experience and capacity. HUD strongly encourages the partnering by Grantees with State Housing Finance Agencies (SHFA) and other Training Partners. However, only a non-profit organization must be designated as the primary Applicant. This NOFO is structured to encourage agencies to sub-allocate funding to Sub-Grantees or Training Partners or both. Sub-Grantees and Training Partners may include 1) SHFAs; 2) local, county or state governments; or 3) local or state housing coalitions or networks that are public or private non-profit organizations. Sub-Grantees and/or Training Partners in the third category must have Federal tax-exempt status under IRC section 501(a) as an entity described in IRC section 501(c)(3) [(26 U.S.C. 501(a) and (c)(3)).

Applicants for financial assistance must have an active registration in the SAM (www.sam.gov) before submitting an application. In addition, applicants and subgrantees must have a UEI Number. Getting a UEI number and completing SAM registration can take multiple weeks; therefore, Applicants should start this process or check their status early.

See also Section IV.B for necessary form and content information.

All Applicants, Sub-grantees and/or Training Partners must disclose to HUD the status of active HUD Office of Inspector General (OIG) audits or investigations at the time of the NOFO application submission date. At the time of application submission or thereafter, HUD may determine that Applicants are not eligible for grant funding based on its review of HUD OIG audits and investigations.

Individuals, foreign entities, and sole proprietorship organizations are not eligible to compete for, or receive, awards made under this announcement.

Faith-based organizations

(1) Faith-based organizations may apply for this award on the same basis as any other organization, as set forth at [24 CFR 5.109](#), and subject to the protections and requirements of 42 U.S.C. 2000bb et seq., HUD will not, in the selection of recipients, discriminate against an organization based on the organization's religious character, affiliation, or exercise.

(2) A faith-based organization that participates in this program will retain its independence and may continue to carry out its mission consistent with religious freedom and conscience protections in Federal law, including the Free Speech and Free Exercise Clauses of the Constitution, 42 U.S.C. 2000bb et seq., 42 U.S.C. 238n, 42 U.S.C. 18113, 42 U.S.C. 2000e-1(a) and 2000e-2(e), 42 U.S.C. 12113(d), and the Weldon Amendment, among others. Religious accommodations may also be sought under many of these religious freedom and conscience protection laws, particularly under the Religious Freedom Restoration Act.

(3) A faith-based organization may not use direct financial assistance from HUD to support or engage in any explicitly religious activities except where consistent with the Establishment Clause and any other applicable requirements. Such an organization also may not, in providing services funded by HUD, discriminate against a beneficiary or prospective program beneficiary on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

B. Ineligible Applicants

For Profit Entities

Indian Tribes (including as Alaska native villages) and their Tribally Designated Housing Entities (TDHE)

Individuals

C. Cost Sharing or Matching

This Program does not require cost sharing or matching, but provides points based on leverage as described below.

See Section V.A.1.Rating Factors-RF4.

D. Threshold Eligibility Requirements

Applicants who fail to meet any of the following threshold eligibility requirements are deemed ineligible. Applications from ineligible applicants are not rated or ranked and will not receive HUD funding.

1. Resolution of Civil Rights Matters

Outstanding civil rights matters must be resolved before the application submission deadline. Applicants with unresolved civil rights matters at the application deadline are deemed ineligible. Applications from ineligible applicants are not rated or ranked and will not receive HUD funding.

a. An applicant is ineligible for funding if the applicant has any of the charges, cause determinations, lawsuits, or letters of findings referenced in subparagraphs (1) – (5) that are not resolved to HUD’s satisfaction before or on the application deadline date for this NOFO.

(1) Charges from HUD concerning a systemic violation of the Fair Housing Act or receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of a substantially equivalent state or local fair housing law proscribing discrimination because of race, color, religion, sex (including sexual orientation and gender identity), national origin, disability or familial status;

- (2) Status as a defendant in a Fair Housing Act lawsuit filed by the United States alleging a pattern or practice of discrimination or denial of rights to a group of persons raising an issue of general public importance under 42 U.S.C. 3614(a);
- (3) Status as a defendant in any other lawsuit filed or joined by the Department of Justice, or in which the Department of Justice has intervened, or filed an amicus brief or statement of interest, alleging a pattern or practice or systemic violation of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974, the Americans with Disabilities Act, Violence Against Women Act, or a claim under the False Claims Act related to fair housing, non-discrimination, or civil rights generally including an alleged failure to affirmatively further fair housing;
- (4) Receipt of a letter of findings identifying systemic non-compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974; Violence Against Women Act; or the Americans with Disabilities Act; or
- (5) Receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of provisions of a state or local law prohibiting discrimination in housing based on sexual orientation, gender identity, or lawful source of income.

b. HUD will determine if actions to resolve the charge, cause determination, lawsuit, or letter of findings taken before the application deadline date will resolve the matter. Examples of actions that may be sufficient to resolve the matter include, but are not limited to:

- (1) Current compliance with a voluntary compliance agreement signed by all the parties;
- (2) Current compliance with a HUD-approved conciliation agreement signed by all the parties;
- (3) Current compliance with a conciliation agreement signed by all the parties and approved by the state governmental or local administrative agency with jurisdiction over the matter;
- (4) Current compliance with a consent order or consent decree;
- (5) Current compliance with a final judicial ruling or administrative ruling or decision; or
- (6) Dismissal of charges.

2. Timely Submission of Applications

Applications submitted after the deadline stated within this NOFO that do not meet the requirements of the grace period policy are marked late. Late applications are ineligible and are not considered for funding. See Section IV. D. Application Submission Dates and Times.

E. Statutory and Regulatory Requirements Affecting Eligibility

Eligibility Requirements for Applicants of HUD's Financial Assistance Programs

The following requirements affect applicant eligibility. Detailed information on each requirement is found in the [“Eligibility Requirements for Applicants of HUD's Financial Assistance Programs” document on HUD's Funding Opportunities page.](#)

- Universal Identifier and System for Award Management (SAM.gov) Requirements
- Outstanding Delinquent Federal Debts

- Debarments or Suspensions, or both
- Mandatory Disclosure Requirement
- Pre-selection Review of Performance
- Sufficiency of Financial Management System
- False Statements
- Prohibition Against Lobbying Activities

In addition, each applicant under this NOFO must have the necessary processes and systems in place to comply with the Award Term in Appendix A of [24 CFR part 170](#) if the applicant receives an award, unless an exception applies as provided in [2 CFR170.110](#).

F. Program-Specific Requirements

Geographic Coverage. Applicants must propose to provide the housing counseling trainings nationwide. The proposed training program must be national in scope and made available to any eligible housing counselor or manager participating in the HUD Housing Counseling program.

Required activities:

- 1. Eligible Training Recipients.** Recipients of training offered by Grantees under the award must be housing counselors employed by HCAs participating in HUD's Housing Counseling Program or persons enrolled in a HUD-certified Housing Counselor Career Development program sponsored by the TNOFO grantee and an institution of higher education including an HBCU, TCU, or other MSI.
- 2. Open Enrollment.** Training enrollment and assistance provision must be open to all. For example, enrollment, eligibility and scholarships may not be restricted to Affiliates or Branches of a specific Intermediary or Participating Agency or conducted in a way that favors Affiliates or Branches of a particular organization.
- 3. Housing Counseling Training** must not be limited to in-person and must be offered through a variety of models to increase ease of access, including webinars and other Internet-based training models. Grantees must take appropriate steps to ensure effective communications with individuals with disabilities at all courses including via live, Internet-based, and other training modes of delivery.
- 4. Learning Checks.** Regardless of format, training must have learning checks including a final examination that confirm a counselor's participation and measure understanding of course material and learning objectives.
- 5. Scholarships.** The proposal must include a scholarship element, including assistance with travel, hotel, and/or tuition expenses for eligible housing counselors that are employed by HCAs participating in HUD's Housing Counseling Program or persons enrolled in a HUD-certified Housing Counselor Workforce Development Program sponsored by the TNOFO grantee, including military veterans and service members and/or an institution of higher education including an HBCU, TCU, or other MSI.
- 6. Underserved/Underrepresented Populations.** All training programs must effectively serve individuals who belong to undeserved communities and underrepresented populations, including but not limited to: Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+ persons); persons with Limited English Proficiency (LEP); persons who live in rural areas; and persons with disabilities. Affirmative

efforts must be made to ensure that existing housing counseling capacity in underserved and underrepresented housing consumer populations is preserved and expanded. To support the delivery of services in communities where English is not the primary language, the training and testing must be culturally sensitive. Grantees must take reasonable steps to ensure meaningful access to their training programs and activities by persons with LEP.

Eligible Activities.

Applicants must propose to develop and implement a comprehensive and ongoing training program for housing counselors working for agencies participating in HUD's Housing Counseling Program. The training program must contain both basic and advanced training courses. Eligible activities may also include ongoing efforts to evaluate training quality and impact and assess the need for additional training.

An Applicant should propose to provide training on one (1) or more of the training topics listed below.

1. Overview of Housing Counseling. Training should include a review of the principles and applications of housing counseling from the client's and the counselor's point of view. Review the skills and tools needed to be an effective housing counselor. Provide overviews of the industry from a national perspective, as well as information about pre- and post-purchase counseling for homeowners, delinquency, and default counseling.

2. Homeownership Counseling (24 CFR 5.100). Housing counseling related to homeownership and residential mortgage loans when provided in connection with HUD's Housing Counseling Program, or required by or provided in connection with HUD Programs as defined in 24 CFR 5.111. Homeownership counseling is housing counseling that covers the decision to purchase a home, the selection and purchase of a home, issues arising during or affecting the period of ownership of a home (including financing, refinancing, default, and foreclosure, and other financial decisions) and the sale or other disposition of a home.

3. Pre-Purchase Counseling. Train counselors on readiness and preparation for homeownership; selection and mobility; fair housing, fair lending and predatory lending; budgeting and credit, insurance, loan product and feature comparison; FHA Single Family Mortgage Insurance Program lender practices, underwriting and financial analysis requirements; purchase procedures and closing costs; money management (does not include debt management plan programs); selecting a real estate agent; home inspections; alternative sources of mortgage credit; down payment assistance programs; special programs available to potential homebuyers; and referrals to community services and regulatory agencies. This training should include information on understanding Special Purpose Credit Programs and other credit programs. Use sample customer cases to identify obstacles and simulate counseling sessions. Teach counselors to give consumers more information about the true cost of living by incorporating both housing and transportation costs into measures of affordability. Provide counselors the knowledge and tools to help borrowers avoid inflated appraisals, unreasonably high interest rates, unaffordable repayment terms, and other conditions that can result in a loss of equity, increased debt, default, and eventually foreclosure. Train counselors to counsel potential homebuyers to get an independent home inspection before the home sale closing, and train counselors in any HUD required home inspection materials, if applicable. Train counselors to educate potential homebuyers on how to recognize fair housing issues such as redlining, steering, discriminatory appraisals and discriminatory advertising practices. Train counselors to educate potential homebuyers on how to file a fair housing complaint if they suspect their rights have been

violated under the Fair Housing Act. Teach counselors how to read the warning signs of debt problems and how to recognize predatory lenders, as well as identify available resources to help keep homeowners out of financial trouble. Inform counselors about HUD's Equal Access Rule and the prohibition against discrimination based on actual or perceived sexual orientation, gender identification, or marital status. Assist counselors with obtaining a thorough understanding of state and federal regulations, including the Real Estate Settlement Procedures Act of 1974 (12 U.S.C. 2601 et seq.) (RESPA) and the Truth in Lending Act (15 U.S.C.1601 et seq.) (TILA) so they are fully versed in Federal, state, and local requirements in the counseling service area.

4. Lending Practices and Financial Analysis. Train counselors on lending practices, analysis of financials, risk elements, and general concepts affecting conventional and government-insured mortgage loan decisions. Provide counselors with effective procedures and techniques to teach clients about financing options and how to choose appropriate loan products and features. Review case studies to illustrate the functional areas of the underwriting process, from the application to the loan sale.

5. Homebuyer Education Programs. Train counselors how to: deliver a comprehensive homebuyer education program; use the best materials and methods to train homebuyers with regard to increasing homebuyer financial literacy; create informed consumers when shopping for a home and mortgage loan, hazard and flood insurance; improve one's budget and credit profiles; encourage potential homebuyers to order an independent home inspection before home sale closing, and train counselors regarding any HUD required home inspection materials, if applicable; make homebuyers knowledgeable about the Lead Disclosure Rule for pre-1978 homes, EPA's Rehabilitation, Repair, and Paint Rule and the testing available for lead hazards, toxic mold, radon, and other conditions that affect the living environment and can add substantial costs to home owners having to address these issues after settlement; and maintaining one's home and finances after purchase.

6. Foreclosure and Eviction Prevention. Train counselors on the protocol for counseling homeowners or renters in financial distress. Address all aspects of delinquency and default, including reasons for default, ways to maximize income and reduce expenses, calculating delinquencies, understanding the players in the mortgage marketplace, loss-mitigation options for FHA-insured and other loans, information about foreclosure laws and timelines, tips on effectively intervening with lenders and servicers, managing multiple mortgages or liens, and the pros and cons of mortgage loan refinancing. This training should address strategies to assist renters who are facing eviction as a result of landlords facing foreclosure. This training should include information on Federal and other foreclosure prevention programs, as well as how to identify and report loan scams.

7. Resolving or Preventing Mortgage Delinquency or Default. Train counselors on the consequences of default and foreclosure; loss mitigation options, budgeting and credit; restructuring debt; importance of paying property taxes; obtaining re-certification for a mortgage subsidy; and establishing reinstatement repayment plans. It may also include assisting clients affected by predatory lending; foreclosure prevention strategies; national emergencies or disasters; explaining the foreclosure process; and assisting clients with locating alternative housing. This training should include information necessary to obtain an understanding of governmental mortgage insurance and guarantee programs. Furthermore, instruction must be provided on various types of insurance products, such as hazard insurance, flood insurance, earthquake insurance, etc.

8. Non-Delinquency Post Purchase. Train counselors on how to advise individuals and conduct workshops on home maintenance and financial management for homeowners, including: escrow funds; budgeting; refinancing; improving mortgage terms; home equity; home improvement; utility costs; energy efficiency improvements; property taxes; rights and responsibilities of homeowners; loan and grant options; housing codes and housing enforcement procedures; accessibility codes and how to design features to provide accessibility for persons with disabilities; non-discriminatory lending and funding for persons who modify their dwellings to accommodate disabilities; how to specify and bid construction work; and how to enter into and manage construction contracts including actions to address the non-performance of contractors Home Improvement/home maintenance; insurance basics; lead safety for pre-1978 homes (including EPA's Rehabilitation, Repair, and Paint Rule). This training should include discussions of FHA rehab loan products, as well.

9. Rental Housing Counseling. Train counselors on how to educate individuals on the decision to rent, how to secure and maintain residence in rental housing, responsibilities of tenancy, affordability of renting, and eviction prevention. Rental topics may include HUD rental and rent subsidy programs; other federal, state, or local rental assistance; housing search assistance; landlord/tenant laws; lease terms; rental delinquency; budgeting for rent payments; and providing assistance with locating alternative housing; tenant/landlord responsibilities; Lead Disclosure Rule requirements and lead safety awareness; fair housing and other civil rights laws and requirements, including rights and protections under the Violence Against Women Act (VAWA); state and local laws, including fair housing laws; the eviction process; budgeting; and how to access rental assistance programs, research, and use of policy and program information, such as market eviction research and eviction data to develop counseling strategies to help renters maintain their housing and avoid evictions. OHC will not provide legal advice as part of any training, nor endorse any legal advice or counseling services provided by a housing counselor that receives training under this grant. Teach counselors to give consumers more information about the true cost of living by incorporating both housing and transportation costs into measures of affordability. Train counselors on how to identify tenant screening criteria that may be unlawful and how to assist applicants prevent or appeal a denial of a rental application. Train counselors regarding mobility counseling, (e.g., promoting strategies which result in moves to low poverty and racially diverse communities, closer to jobs, quality education, health care and other services); outreach and recruitment of landlords, owners and developers in diverse communities of opportunity; and outreach to community organizations that can provide support to families to solicit their involvement, identify available housing, and link families to services and other support in diverse communities of opportunity. Note that the payment of rental assistance on behalf of a client, and/or the collection of rent or loans, exclusively, have never been categorized as housing counseling. Include counseling regarding future home ownership opportunities when provided in connection with HUD's Housing Counseling Program or provided in connection with HUD Programs as defined in 24 CFR 5.111.

10. Reverse Mortgages. Train counselors about reverse mortgages for senior homeowners, including FHA-insured HECMs. Teach them to understand products and programs, analyze plans, compare their costs and benefits, and identify alternatives, borrower responsibilities, lender responsibilities, taxes and insurance, and financial strategies. This training should include reviews of relevant counseling skills and ethics.

11. HECM Default Counseling. Train housing counselors to work with HECM borrowers who are delinquent and/or at risk of defaulting due to unpaid property taxes, insurance, homeowner

association dues, or other fees and assessments. Counselors do not need to be HECM roster counselors to perform HECM default counseling.

12. Reverse Mortgage Examination Preparation. Prepare counselors for the HUD HECM Counselor examination.

13. Reverse Mortgage Continuing Education. Provide counselors continuing education courses with advanced topics on reverse mortgage counseling.

14. Counseling Individuals and Families that are Experiencing Homelessness or at Risk of Experiencing Homelessness. Train counselors about the various social services available to which they should be referring families and individuals experiencing, or at risk of experiencing homelessness. Provide information on Federal, state, and local homeless programs, including the Continuum of Care (COC) Program and how clients can access these programs. Share strategies on how to partner with local public service providers to ensure that clients receive attention and assistance quickly and efficiently. Review the unique characteristics of the homeless population to help counselors understand the types of financial literacy, physical, and social problems facing the families and individuals who seek their assistance.

15. Military Veterans Experiencing Homelessness. Train counselors about the unique aspects of military veterans' homelessness. Discuss the various social services available for homeless military veterans, including HUD-VASH, which is a collaborative program that pairs HUD's Housing Choice Voucher (HCV) rental assistance with case management and supportive services from the U.S. Department of Veterans Affairs. This training should include information on how to apply for benefits from the U.S. Department of Veterans Affairs (VA) and Social Security Administration (SSA); and how to find permanent housing.

16. Emergency Preparedness and Recovery Counseling. Train counselors with an overview on how to guide clients following any variety of disasters/emergencies. Preparedness counseling includes information about home and family preparedness as well as the financial planning; Recovery counseling can focus on relocation, re-housing, rebuilding, helping clients navigate FEMA, insurance, local aid and grant programs, credit counseling, and foreclosures. In addition to traditional housing counseling activities, agencies and their counselors will provide community support activities.

17. Counseling in the Disaster Recovery Period. Train counselors on how to guide clients following any variety of disasters/emergencies, including flooding, pandemic, fires, tornadoes, hurricanes, etc. Recovery counseling can focus on relocation, re-housing, rebuilding, helping clients navigate and access assistance from HUD recovery programs, FEMA, insurance, local aid and grant programs, credit counseling, and foreclosures. In addition to traditional housing counseling activities, the agencies and their counselors will provide community support activities. Counselors need to understand disaster recovery programs from various agencies such as HUD (Section 8, FHA insured mortgage financing (e.g., Sections 203(h) and 203(k) programs, forbearance, foreclosure and/or eviction moratorium policies), FEMA, SBA, United States Department of Agriculture (USDA), Government-Sponsored Enterprises (GSEs), and others. They also need to understand homeowners and flood insurance requirements and policies. Counselors need to be prepared to work with highly stressed clients and staff who may be affected by Post Traumatic Stress Disorder. Counselors also need to be familiar with the unique needs following a disaster of protected class groups, such as the accessibility needs of individuals with disabilities, the childcare needs of families with children, the language

assistance needs of LEP persons, and the needs of many groups for culturally competent services.

18. Disaster Assistance Counseling in the Response Period. Train counselors to assist clients dealing with post disaster issues and problems in the aftermath of a disaster. Includes post disaster assistance housing counseling and education. It can be group education or one-on-one counseling. Counselors need to understand how to access benefits from disaster recovery programs from various agencies such as HUD (Section 8, FHA insured mortgage financing (e.g., Sections 203(h) and 203(k) programs, forbearance, foreclosure and/or eviction moratorium policies), FEMA, SBA, United States Department of Agriculture (USDA), Government-Sponsored Enterprises (GSEs), and others. They also need to understand homeowners and flood insurance requirements and policies. Counselors need to be prepared to work with highly stressed clients and staff.

19. Emergency Preparedness Plans and Continuity of Operations Plans. Train agency managers how to develop agency Emergency Preparedness Plans and Continuity of Operations Plans (COOP) and how to implement the Plans. Provide resources, templates, etc. from HUD, FEMA, Red Cross and other agencies. Discuss how to work with local communities and other agencies for services and funding and how to formalize the relationships. Business continuity planning must account for both man-made and natural disasters. Agencies should plan to manage any emergency. Be prepared to assess the situation, use common sense and available resources to take care of agency staff, clients, and community. A COOP will help keep an agency operating as it responds to and recovers from the effects of a disaster or emergency situation.

20. Family Emergency Preparedness Plans. Training counselors to assist clients in preparing a Family Emergency Preparedness Plan. Provide resources, templates, etc. from HUD, FEMA, Red Cross and other agencies.

21. Counseling on Energy Efficiency. Train housing counselors about the role of energy efficiency in boosting housing affordability and improving health, safety, and comfort. Discuss how to use a home energy assessment to help clients make informed decisions about energy efficiency activities. Review low and no cost actions and adjustments clients can make to lower energy costs, as well as home maintenance. Discuss programs available for financing energy efficient improvement, including FHA and conventional products.

22. Property Appraisal and Valuation Equity (PAVE.). Train counselors to understand Racial appraisal bias in home property valuation. This training should include discussions of the strategies to combat appraisal bias, as well as resources counselors can access to support individuals who have been impacted. There should be discussion of how Fair Housing Initiatives Program (FHIP)/Fair Housing Assistance Program (FHAP) organizations and housing counseling agencies (HCAs) can combine efforts to combat appraisal bias. Recommendations and best practices for counseling clients and individuals who have been impacted by appraisal bias, including informing individuals of their right to file a housing discrimination complaint with HUD, should be included.

23. Fair Housing and Civil Rights. Train housing counselors how to provide households with information, counseling and/or education on housing discrimination, including discrimination in lending and property insurance practices, and the rights and remedies available under Federal, state and local fair housing laws. Train housing counselors how to provide households with the name and contact information for local fair housing groups or government agencies that enforce

fair housing laws. Train housing counselors to make persons aware of Federal, state and local accessibility requirements, as well as innovative housing design or construction to increase access for persons with disabilities. Train housing counselors on the obligation to ensure meaningful access to programs and activities for persons with LEP. Train housing counselors on the obligation to ensure communication with persons with disabilities is as effective as communication with persons without disabilities, including by use of auxiliary aids and services. Train housing counselors on HUD requirements under HUD's Equal Access Rule and on the prohibition of discrimination based on sexual orientation and gender identity as a form of sex discrimination under the Fair Housing Act and any applicable state or local laws. Train housing counselors on how their clients may file a housing discrimination complaint. The contact information for the HUD Office of Fair Housing and Equal Opportunity is: 1-800-669-9777 (Toll free). HUD welcomes and is prepared to receive calls from individuals who are deaf or hard of hearing, as well as individuals with speech and communication disabilities. To learn more about how to make an accessible telephone call, please visit [https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs.](https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs;); and www.hud.gov/fairhousing.

24. Fair Lending and Mortgage Fraud Counseling. Familiarize counselors with the requirements of the Fair Housing Act, truth in lending laws, predatory lending laws, HUD's Equal Access Rule, and their companion statutes and regulations as they apply to housing providers, mortgage lenders, realtors, homebuilders, public agencies, and non-profit organizations. Train counselors to recognize lender and real estate practices that create an unjustified discriminatory effect based on a protected class under the Fair Housing Act. Train housing counselors in how to provide guidance and assistance to the client regarding identifying fair lending violations, loan scams, and mortgage fraud, filing a formal complaint and pursuing a formal investigation with the appropriate authorities under these laws, for example HUD's Office of Fair Housing and Equal Opportunity (for discriminatory lending) at: 1-800-669-9777 (Toll free); HUD welcomes and is prepared to receive calls from individuals who are deaf or hard of hearing, as well as individuals with speech and communication disabilities. To learn more about how to make an accessible telephone call, please visit [https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs](https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs;); www.hud.gov/fairhousing; the Loan Modification Scam Prevention Network: <https://www.preventloanscams.org/> and the HUD OIG Hotline Toll-free at: 800-347-3735, or HUD welcomes and is prepared to receive calls from individuals who are deaf or hard of hearing, as well as individuals with speech and communication disabilities. To learn more about how to make an accessible telephone call, please visit <https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>, Fax: 202-708-4829; E-mail: hotline@hudoig.gov

25. Affirmatively Furthering Fair Housing. Recipients have a duty to affirmatively further fair housing by taking meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaning actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with racially balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further

fair housing extends to all program participant's activities and programs relating to housing and urban development.

26. HUD's Housing Counseling Program Compliance. Train counselors about the requirements of HUD's Housing Counseling Program, including the delivery of home ownership counseling and education, form HUD-9902 reporting, preparing for HUD performance reviews and resolving findings, and supervisory monitoring.

27. Housing Counseling Program Management. Train managers and future managers about opportunities to diversify funding sources; recruiting, managing, and retaining counseling staff; performing contract reviews and programmatic assessments; marketing to a variety of target audiences; complying with fair housing and other civil rights laws and requirements; maintaining focus on quality assurance and higher proficiency; increasing capacity; and efficiently managing case files utilizing a variety of time management techniques.

28. How to Start a Housing Counseling Program. HUD published the Final Rule for the Housing Counselor Certification Program on December 14, 2016. That rule implements statutory requirements that housing counseling required under or provided in connection with all HUD programs must be provided by HUD certified housing counselors employed by a HUD-approved HCA. This course is designed for agencies covered by HUD's Final Rule for Housing Counseling Certification, but not currently participating in HUD's Housing Counseling Program. Any course should provide information on how to start a HUD Housing Counseling Program. Suggested topics include how to identify the needs of target population, identify counseling services, develop a work plan, create intake, disclosure, and privacy forms, identify resources, identify a client management system, collect data for services provided, and an overview on how to apply for HUD approval to participate in HUD's Housing Counseling Program. A list of Other HUD Programs covered by this final rule can be found at <https://www.hudexchange.info/resource/5192/other-hud-programs-covered-under-huds-final-rule-for-housing-counseling-certification/>

29. Homebuyer Education Programs. Train counselors how to: deliver a comprehensive home buyer education program; use the best materials and methods to train home buyers with regard to increasing home buyer financial literacy; create informed consumers when shopping for a home and mortgage loan; improve one's budget and credit profiles; encourage potential home buyers to order an independent home inspection before home sale closing, and train counselors regarding any HUD required home inspection materials, if applicable; make home buyers knowledgeable about the Lead Disclosure Rule for pre-1978 homes, EPA's Rehabilitation, Repair, and Paint Rule and the testing available for lead hazards, toxic mold, radon, and other conditions that affect the living environment and can add substantial costs to home owners having to address these issues after settlement; and maintaining one's home and finances after purchase.

30. Delivering Counseling Services in a Virtual Environment. May include training counselors to virtually provide housing counseling services, maintain client files and PII, collect electronic signatures, manage call centers, deliver one-to-one and group counseling remotely, working from home.

31. Making Housing Counseling Culturally Sensitive and linguistically appropriate. Prepare counselors to be more culturally sensitive and linguistically appropriate to the needs of the community they are serving. Include discussions of Racial Equity and Diversity. This training should include discussion of programs for MSIs.

32. Marketing Your agency. Train counselors about the tools and techniques available for successful marketing of agency housing counseling services. The Office of Housing Counseling marketing strategies and National Awareness campaign should be included.

33. Dealing with Stress, trauma, and mental health. Train counselors to recognize stress, trauma and mental health issues in their clients and themselves. Provide tools and resources for both clients and counselors to deal with the issues.

34. HUD Certified Housing Counselor Examination Preparation. Prepare counselors to take the HUD Certified Housing Counselor examination and demonstrate competency in each of the following housing counselor certification topics: 1) financial management; 2) property maintenance; 3) responsibilities of home ownership and tenancy; 4) fair housing and other civil rights laws and requirements; 5) housing affordability; and 6) avoidance of, and responses to, rental and mortgage delinquency and avoidance of eviction and mortgage default. Delivery can include individual and group tutoring sessions. Required skills such as mortgage math should be included.

35. Housing Counselor Workforce Development Program. Design, Develop and Administer a housing counseling program that is designed to prepare students for a career in housing counseling. Individuals must be sponsored by a HUD participating housing counseling agency to qualify. This training should include programs for HBCUs, MSIs and military veterans and service members. An applicant partnering with an MSI will also be eligible for additional funds under this activity, when the application includes a Letter of Commitment certifying that a partnership is in place and signed by an authorizing official of the MSI and documentation of the college or university's status as an HBCU, Hispanic-serving institution, Tribal-controlled post-secondary institution, Alaska Native-serving or Native-Hawaiian-serving institution, Predominantly Black Institution, Asian and Native American Pacific Islander-serving institution, or Native American-serving non-tribal institution.

36. Disaster Counseling Certification. Design, Develop, and Administer a disaster housing counseling certification program that is designed to prepare certified housing counselors to provide disaster housing counseling after local, state or national emergency/disaster. from FEMA support to FEMA disaster teams and facilities as requested. Support can be on-site or virtual. Specialized courses from OHC, FEMA. SBA and other agencies should be required for the certification.

37. Ethics in Counseling. This training should include the ethical responsibility of housing practitioners and HCAs. Discuss the HUD Housing Counseling standards and guidelines in detail. Deepen the conversation between the importance of conflict of interest and referring clients to other Housing professionals. Have a clear understanding of the importance of client disclosure forms. Lastly, recognize a framework of critical thinking to navigate through scenarios that may question the ethical portion of housing counseling programs.

Additional Requirements. Agencies selected as Grantees must comply with the following requirements:

1. Salary Limitation for Consultants. FY2023 Grant funds may not be used to pay or provide reimbursement for payment of the salary of a consultant/trainer, whether retained by the federal government or the Grantee, at a rate more than the equivalent of General Schedule 15, Step 10

base pay rate for which the annual rate for FY2023 is \$152,771. The hourly rate is \$73.20.

2. Accessibility. In the conduct of training and educational courses, successful Applicants must ensure access to programs or activities for individuals with disabilities, i.e., holding live, in-person training or any other type of meeting in an accessible location, in accordance with the regulations implementing Section 504 of the Rehabilitation Act of 1973 and Titles II and III of the Americans with Disabilities Act of 1990, as applicable. All programs or activities must be readily accessible and usable by individuals with disabilities, including being held in accessible locations or use accessible technology. The recipient does not have to take an action that they can demonstrate is a fundamental alteration of the program or an undue financial and administrative burden, in which case the recipients must take any action that would not result in such an alteration or such burden but would nevertheless ensure that persons with disabilities receive the benefits and services of the program or activity, e.g., training at an alternate accessible site, in-home training. Persons with disabilities must receive services in the most integrated setting appropriate to their needs. Recipients must ensure that communication with individuals with disabilities is as effective as communication with individuals without disabilities which can be accomplished by providing auxiliary aids and services, and reasonable accommodations. Such aids and services may include, but are not limited to: materials provided in different formats, including large print or Braille; interpreter services including such service accompanying web-based training; recording and archiving live, in-person training; and use of closed captioning. Arrangements for registration, testing, and evaluation must be accessible to persons with disabilities. Information on how to request available assistive services and reasonable accommodations must be available, as well as available in different formats. Regarding accessible technology, HUD requires its funding recipients to adopt the goals and objectives of Section 508 of the Rehabilitation Act of 1973 by ensuring, whenever Electronic and Information Technology (EIT) is used, procured, or developed, that persons with disabilities have access to and use of the information and data made available through the EIT on a comparable basis as is made available to and used by persons without disabilities.

3. Effective Communications and Meaningful Access. Effective communications: Successful Applicants must ensure that all training notifications as well as communication during training sessions are provided in a manner that is effective for persons with hearing, visual, and other communications-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8.6), and the Americans with Disabilities Act. Recipients must ensure that communication with individuals with disabilities is as effective as communication with individuals without disabilities which can be accomplished by providing auxiliary aids and services such as ensuring that training materials and all products and tools for capacity building are in appropriate alternative formats as needed, e.g., Braille, audio, large type, sign language interpreters, and assistive listening devices, etc. Meaningful Access: Recipients shall take reasonable steps to ensure meaningful access to their programs and activities for persons with LEP. For more information on LEP, please visit https://www.hud.gov/program_offices/fair_housing_equal_opp/promotingfh/lep-faq.

4. Reports. All grant recipients will be required to report to HUD on a monthly and quarterly basis, as specified in the Cooperative Agreement.

5. Code of Conduct. Applicants that are subject to 2 CFR Part 200 are required to develop and maintain a written code of conduct (See e.g. 2 CFR 200.318(c) for contents of a code of conduct). The code of conduct must prohibit real and apparent conflicts of interest that may arise

among employees, officers, or agents; prohibit the solicitation and acceptance of gifts or gratuities by an organization's officers, employees and agents for their personal benefit in excess of minimal value; and outline administrative and disciplinary actions available to remedy violations of such standards. Self-recusal will not eliminate a potential or apparent conflict of interest. Prior to entering into an agreement with HUD, the Applicant will be required to submit a copy of its code of conduct and describe the methods it will use to ensure that all officers, employees, and agents of the organization are aware of the code of conduct.

6. Financial Management Systems. Applicants selected for funding must provide documentation demonstrating that the Applicant's financial management systems satisfy the requirements in the applicable regulations at 2 CFR Part 200. Consistent with the requirements of the Single Audit Act Amendments of 1996 (31 U.S.C. 7501-07), if the applicant expended \$750,000 or more in federal awards in its most recent fiscal year, such documentation must include a certification from, or a copy of, the most recent audit by the Applicant's independent public accountant attesting to the fact that the Applicant maintains internal controls over Federal awards, complies with applicable laws, regulations, and contract or grant provisions, and prepares appropriate financial statements. The Applicant will have at least thirty (30) calendar days to respond to this requirement. If an Applicant does not respond within the prescribed time or responds with insufficient documentation, then HUD may determine that the Applicant has not met this requirement and may withdraw the award offer. If an Applicant has not expended \$750,000 or more in Federal awards in its most recent fiscal year, HUD, or its assignee may conduct an audit of the Applicant's financial system. HUD will work with the Applicant to meet federal financial management system standards prior to HUD releasing funds.

7. Indirect Cost Rate.

Consistent with 2 CFR 200.414, Applicants may use their negotiated rate or the de minimis rate of ten percent (10%) of Modified Total Direct Costs (MTDC). See Section IV.F of this NOFO for indirect cost rules information.

Indirect costs are, by nature, administrative and represent the expenses of doing business that are not readily identified, exclusively with a specific grant, contract, project function or activity, but are necessary for the general operation of the organization and the conduct of activities it performs. The Federal requirements for the determination of allowable and unallowable direct and indirect Facilities and Administrative (F&A) costs is established by 2 CFR 200, Subpart E - Cost Principles. Grantees are required to properly document their cost methodologies to demonstrate that indirect costs meet these criteria.

8. Participation in HUD-Sponsored Program Evaluation. See Section VI, B below.

9. Ensuring the Participation of Small Businesses, Small Disadvantaged Businesses, and Women-Owned Businesses. See Section VI, B below.

10. Executive Order 13166, Improving Access to Services for Persons with LEP. Housing counseling training organizations shall take reasonable steps to ensure meaningful access to their services to individuals with LEP. Applicants are to comply with Executive Order 13166, and may refer to the Department's January 22, 2007 Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732).

11. Executive Order 13279, Equal Protection of the Laws for Faith-Based and Community Organizations. HUD is committed to full implementation of Executive Order 13279 in the operation of its programs.

12. The Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), the Age

Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), and Title IX of the Education Amendments Act of 1972 (20 U.S.C. 1681 et seq.).

13. Affirmatively Furthering Fair Housing. Under Section 808(e)(5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients. Affirmatively Furthering Fair Housing means taking meaningful actions, in addition to combating discrimination to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunities, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant’s activities and programs relating to housing and urban development. “Meaningful actions” are significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. Specifically, action must be taken to fulfill, as much as possible, the goal of open, integrated residential housing patterns and to prevent the increase of segregation, of racial groups whose lack of opportunities the Act was designed to combat.

Examples of housing counseling activities that would be consistent with the obligation to AFFH include, but are not limited to, the following:

- a. Providing persons with counseling, education, or information on discriminatory housing and mortgage lending practices and the rights and remedies available.
- b. Maintaining a database of accessible housing opportunities in the community for use by persons with disabilities and providing in-language counseling to help with the needs of LEP persons who may have trouble with lending, establishment of credit, or accessing relevant financial services.
- c. Providing fair housing mobility counseling to help persons move to and access affordable housing in communities with access to high quality community assets, such as good schools, transportation options, and access to jobs.

Further examples of applicant activities that would be consistent with the obligation to AFFH include, but are not limited to, the following:

- Training counselors to provide households with information, counseling and/or education on discriminatory housing, lending, and insurance practices and the rights and remedies available under Federal, state, and local fair housing and other civil rights laws;
- Training counselors to provide households with names and contact information for local fair housing groups or government agencies that enforce fair housing and other civic rights laws;
- Training counselors to make persons aware of Federal, state and local accessibility requirements including, but not limited to, reasonable accommodations and modifications, as well as innovative housing design or construction to increase access for persons with disabilities;

- Training counselors to develop a system to share information about possible discrimination and, when there is information that suggests that individual or systemic violations of fair housing laws have occurred or are occurring, training housing counselors to provide this information to HUD or local Fair Housing Assistance Program (FHAP) agencies and Fair Housing Initiatives Program (FHIP) agencies. Examples of information that suggest systemic discrimination include knowing of multiple clients of the same protected class who are unable to obtain housing from the same housing provider or knowing of multiple clients who allege discrimination or harassment involving the same housing provider;
- Training counselors to affirmatively market counseling and education services to those least likely to apply; Train counselors to provide households with information on housing options in a range of neighborhoods, including those of higher opportunity, allowing households to identify neighborhoods that best fit their needs;
- Training counselors to become familiar with affirmative fair housing marketing requirements to inform clients of housing opportunities that provide greater housing choice or mobility, as well as affirmative fair housing requirements for housing counseling agencies, such as displaying the fair housing symbol;
- Training counselors on methods for affirmatively marketing housing counseling services, such as advertising in publications in non-English languages or oriented to certain population groups and co-marketing with settlement or advocacy organizations;
- Training counselors to: become familiar with accessibility requirements; serve clients with disabilities who live in segregated or institutional settings, and their representatives, through providing meaningful access to housing choices in integrated settings with access to long-term healthcare and support services; educate clients with disabilities on effective housing search strategies; inform clients of skilled providers of housing search assistance; inform clients of housing builders, management companies, real estate, and brokers that are skilled in providing housing opportunities in the most integrated setting appropriate to the needs of persons with disabilities; and /or create, maintain, and market a database of accessible housing for persons with disabilities;
- Training counselors must ensure housing counseling training activities are accessible to persons with disabilities, including making reasonable accommodations, as necessary. Training counselors must also describe how they will take reasonable steps to provide meaningful access to persons with LEP including but not limited to translating materials into non-English languages. For more information about how this requirement may be met for this grant, (See Rating Factors 2 and 3 in Section V below).

Advancing Racial Equity

In accordance with Executive Order [13985](#), *Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, and federal fair housing and civil rights laws, you must submit a narrative demonstrating the following:

- You analyzed the racial composition of the persons or households who are expected to benefit from your proposed grant activities;
- You identified any potential barriers to persons or communities of color equitably benefiting from your proposed grant activities;
- You detailed the steps you will take to prevent, reduce or eliminate these barriers; and

- You have measures in place to track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities.

Note that any actions taken in furtherance of this section must be consistent with federal nondiscrimination requirements.

Affirmative Marketing

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. Such demographic groups may include, for example, Black and Brown persons or communities, individuals with limited English proficiency, individuals with disabilities, or families with children. Such activities may include outreach through community contacts or service providers or at community centers serving the target population; and marketing on websites, social media channels, television, radio, and print media serving local members of the targeted group. Documentation for this factor consists of a narrative describing the activities that will fulfill the factor requirements.

G. Criteria for Beneficiaries.

Criteria are also listed under Additional Requirements in Section F above.

IV. APPLICATION AND SUBMISSION INFORMATION

A. Obtain an Application Package

Instructions for Applicants

All application materials, including the Application Instructions and Application Package, are available through Grants.gov. You must access and review all available application materials. You must submit your application electronically via Grants.gov under the Funding Opportunity Number cited within this NOFO. Your application must list the applicable Funding Opportunity Number.

You can request a waiver from the requirement for electronic submission, if you demonstrate good cause. An example of good cause may include: a lack of available Internet access in the geographic area in which your business offices are located. However, lack of SAM registration or valid UEI is not a good cause. If you cannot submit your application electronically, you must ask in writing for a waiver of the electronic grant submission requirements. HUD will not grant a waiver if you fail to submit to HUD in writing or via email a request for a waiver at least 15 calendar days before the application deadline. If HUD grants a waiver, a paper application must be received before the deadline for this NOFO. To request a waiver, you must contact:

Name:

Virginia F. Holman

Email:

virginia.f.holman@hud.gov

HUD Organization:

HSG

Street:

600 East Broad Street, 3rd Floor

City:

Richmond
 State:
 VA VIRGINIA
 Zip:
 23219

Inquiries regarding this NOFO should be submitted to housing.counseling@hud.gov and indicate 'FY23 Training NOFO' in the subject line.

B. Content and Form of Application Submission

You must verify that boxes 11, 12, and 13 on the SF-424 match the NOFO for which you are applying. If they do not match, you have downloaded the wrong Application Instruction and Application Package.

Submission of an application that is otherwise sufficient, under the wrong Assistance Listing and Funding Opportunity Number is a Non-Curable Deficiency, unless otherwise stated under the Threshold requirements section.

1. Content

Forms/Assurances/Certifications	Submission Requirement	Notes/Description
Application for Federal Assistance (SF-424)	Review section IV.G. of this NOFO for detailed submission requirements.	
Applicant/Recipient Disclosure/Update Report (HUD 2880)	Review section IV.G. of this NOFO for detailed submission requirements	
HUD-92910		

SF424 Application for Federal Assistance In Block 8.d of the form, Applicant must include a 9-digit number for the Applicant’s zip code. Please be sure to check your UEI number and ensure that it is listed on <https://www.sam.gov/sam/> with an active registration, and that the person submitting the application has an ID and password for the Grants.gov system and has been authorized to submit the application on behalf of the Applicant organization named in block 8a of the SF424 by the eBiz Point of Contact listed in the SAM.gov registration for the Applicant organization. Since Applicants are not required to request a specific grant amount, all Applicants should enter \$1 in block 18a.

1. Organization Description. Applicants must provide a brief description, no more than 225 words, as they would like it to appear in the press release issued by HUD in the event that the Applicant is funded through this NOFO. Each description should contain: name of organization; organizational history; purpose and mission; years of service; affordable housing services provided; number of clients served to date; and agency web address for additional information.

2. Non-Profit Status. Each Applicant is required to submit, for itself and for any organization with which it is partnering for the purpose of this NOFO, a legible copy of the document that supports the Applicant's claim to be a tax-exempt non-profit organization, where applicable (e.g., a 501(c)(3) determination letter issued by the IRS). The documentation must contain the official name, address, and telephone number of the legal authority that granted the tax exemption.
3. Narrative Statements. Applicants must provide narrative statements responding to specific questions in this NOFO, including the data requested in the Housing Counseling Training Charts. The narratives along with the completed Excel charts and exhibits will constitute the basis for evaluating the application.
4. HUD-92910 Charts. Applicants must provide a complete HUD-92910, Housing Counseling Training Charts, in the required Excel format as part of their application submission. The charts must be completed in their entirety in order for Applicants to receive full points. The completed charts and exhibits along with the narratives will constitute the basis for evaluating the application. .

2. Format and Form

Narratives and other attachments to your application must follow the following format guidelines. Do not submit password protected or encrypted files.

50 Pages maximum length of narratives

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

Course descriptions including summaries, learning objectives, learning measures/ test questions, and handouts or other student aids are excluded from the page limitation. Pages in excess of the size limit will not be read. Number the pages of the narrative statements and include a header that includes the Applicant's name and the Rating Factor number and title. Within each narrative, clearly identify each sub-factor immediately above the response for that sub-factor. Valid file names may only include the following **UTF-8** characters: **A-Z, a-z, 0-9, underscore, hyphen, space, and period.**

If Applicants use any other characters when naming their attachment files their applications will be rejected.

C. System for Award Management (SAM) and Unique Entity Identifier (UEI)

1. SAM Registration Requirement

You must register with <https://www.sam.gov> before submitting their application. You must maintain current information in SAM on immediate and highest-level owner and subsidiaries, as well as on all predecessors that have been awarded a federal contract or grant within the last three years, if applicable. Information in SAM must be current for all times during which you have an active Federal award or an application or plan under consideration by HUD.

2. UEI Requirement

As of April 4, 2022, entities doing business with the federal government must use the UEI created in SAM.gov. Also, you must provide a valid UEI, registered and active at www.sam.gov in the application. For more information, see: <https://www.gsa.gov/about->

[us/organization/federal-acquisition-service/office-of-systems-management/integrated-award-environment-iae/iae-systems-information-kit/unique-entity-identifier-update.](https://www.grants.gov/organization/federal-acquisition-service/office-of-systems-management/integrated-award-environment-iae/iae-systems-information-kit/unique-entity-identifier-update)

3. Requirement to Register with Grants.gov

Anyone planning to submit applications on behalf of an organization must register at Grants.gov and be approved by the E-Biz POC in SAM to submit applications for the organization. Registration for SAM and Grants.gov is a multi-step process and can take four (4) weeks or longer to complete if data issues arise. Applicants without a valid registration cannot apply through Grants.gov. Complete registration instructions and guidance are provided on Grants.gov.

D. Application Submission Dates and Times

1. Application Due Date Explanation

The application deadline is 11:59:59 PM Eastern time on

11/30/2023

Submit your application to Grants.gov unless a waiver has been issued allowing you to submit a paper application. Instructions for submitting your paper application will be contained in the waiver of electronic submission.

“Received by Grants.gov” means the applicant received a confirmation of receipt and an application tracking number from Grants.gov. Grants.gov then assigns an application tracking number and date-and timestamp each application upon successful receipt by the Grants.gov system. A submission attempt not resulting in confirmation of receipt and an application tracking number is not considered received by Grants.gov.

Applications received by Grants.gov must be validated by Grants.gov to be received by HUD.

“Validated by Grants.gov” means the application has been accepted and was not rejected with errors. You can track the status of your application by logging into Grants.gov, selecting “Applicants” from the top navigation, and selecting “Track my application” from the dropdown list. If the application status is “rejected with errors,” you must correct the error(s) and resubmit the application before the 24-hour grace period ends. Applications in “rejected with errors” status after the 24-hour grace period expires will not be received by HUD. Visit Grants.gov for a complete description of processing steps after applying.

HUD strongly recommends you submit your applications at least **48 hours before the deadline** and during regular business hours to allow enough time to correct errors or overcome other problems.

2. Grants.gov Customer Support

Grants.gov provides customer support information on its website at <https://www.grants.gov/web/grants/support.html>. If you have difficulty accessing the application and instructions or have technical problems, contact Grants.gov customer support center by calling (800) 518-GRANTS (this is a toll-free number) or by sending an email to support@grants.gov. The customer support center is open 24 hours a day, seven days per week, except Federal holidays. Individuals who are deaf or hard of hearing, or who have speech and other communication disabilities may use a relay service to reach Grants.gov Customer Support. To learn more about how to make an accessible telephone call, visit the [webpage for Federal Communications Commission](#).

3. Grants.gov Application Submission

You can verify the contents of your submitted application to confirm Grants.gov received everything you intended to submit. To verify the contents of your submitted application:

- Log in to Grants.gov.
- Click the Check Application Status link, which appears under the Grant Applications heading in the Applicant Center page. This will take you to the Check Application Status page.
- Enter search criteria and a date range to narrow your search results.
- Click the Search button. To review your search results in Microsoft Excel, click the Export Data button.
- Review the Status column. To view more detailed submission information, click the Details link in the Actions column.
- To download the submitted application, click the Download link in the Actions column.

Take note of the Grants.gov tracking number, as it is needed by the Grants.gov customer support center should you seek their assistance.

HUD may extend the application deadline for any program if Grants.gov is offline or not available to applicants for at least 24 hours immediately prior to the deadline date, or the system is down for 24 hours or longer and impacts the ability of applicants to cure a submission deficiency within the grace period.

HUD may also extend the application deadline upon request if there is a presidentially declared disaster in the applicant's area.

If these events occur, HUD will post a notice on its website establishing the new, extended deadline for the affected applicants. HUD will also publish the extension on Grants.gov.

In determining whether to grant a request for an extension based on a presidentially declared disaster, HUD will consider the totality of the circumstances including the date of an applicant's extension request (how closely it followed the basis for the extension), whether other applicants in the geographic area are similarly affected by the disaster, and how quickly power or services are restored to enable the applicant to submit its application.

NOTE: Busy servers, slow processing, large file sizes, improper registration or password issues are not valid circumstances to extend the deadline dates or the grace period.

4. Amending or Resubmitting an Application

Before the submission deadline, you may amend a validated application through Grants.gov by resubmitting a revised application containing the new or changed material. The resubmitted application must be received and validated by Grants.gov by the applicable deadline.

If HUD receives an original and a revised application for a single proposal, HUD will evaluate only the last submission received by Grants.gov before the deadline.

5. Grace Period for Grants.gov Submissions

If your application is received by Grants.gov before the deadline, but is rejected with errors, you have a grace period of 24 hours after the application deadline to submit a corrected, received, and

validated application through Grants.gov. The date and time stamp on the Grants.gov system determines the application receipt time. Any application submitted during the grace period but not received and validated by Grants.gov will not be considered for funding. There is no grace period for paper applications.

6. Late Applications

An application received after the NOFO deadline date that does not meet the Grace Period requirements will be marked late and will not be reviewed by HUD for funding

consideration. Improper or expired registration and password issues are not sufficient causes to allow HUD to accept applications after the deadline date.

7. Corrections to Deficient Applications

HUD will not consider information from applicants after the application deadline except for curable deficiencies.

HUD will uniformly notify applicants of each curable deficiency. See curable deficiency definition in section I.A of this NOFO. Examples of curable (correctable) deficiencies include inconsistencies in the funding request and failure to submit required certifications. These examples are non-exhaustive.

When HUD identifies a curable deficiency, HUD will notify the authorized organization representative identified on the SF-424 Application for Federal Assistance via email. This email is the official notification of a curable deficiency.

You must email corrections of Curable Deficiencies to applicationsupport@hud.gov within the time limits specified in the notification. The time allowed to correct deficiencies will be no less than 48 hours and no more than 14 calendar days from the date of the email notification. The start of the cure period will be the date stamp on the email sent from HUD. If the deficiency cure deadline date falls on a Saturday, Sunday, Federal holiday, or on a day when HUD's Headquarters are closed, then the applicant's correction must be received on the next business day HUD Headquarters offices in Washington, DC are open.

The subject line of the email sent to applicationsupport@hud.gov must state: Technical Cure and include the Grants.gov application tracking number or the GrantSolutions application number (e.g., Subject: Technical Cure - GRANT123456 or Technical Cure - XXXXXXXXXXXXX). If this information is not included, HUD cannot match the response with the application under review and the application may be rejected due to the deficiency.

Corrections to a paper application must be sent in accordance with and to the address indicated in the notification of deficiency. HUD will treat a paper application submitted in accordance with a waiver of electronic application containing the wrong UEI as having a curable deficiency.

Failure to correct the deficiency and meet the requirement to have a UEI and active registration in SAM will render the application ineligible for funding.

8. Authoritative Versions of HUD NOFOs

The version of this NOFO posted on Grants.gov includes the official documents HUD uses to solicit applications.

9. Exemptions

Parties that believe the requirements of the NOFO would impose a substantial burden on the exercise of their religion should seek an exemption under the [Religious Freedom Restoration Act \(RFRA\)](#).

E. Intergovernmental Review

This program is not subject to [Executive Order 12372, Intergovernmental Review of Federal Programs](#).

F. Funding Restrictions

Financial Management Systems. Applicants selected for funding must provide documentation demonstrating that the Applicant's financial management systems satisfy the requirements in the applicable regulations at 2 CFR Part 200. Consistent with the requirements of the Single Audit Act Amendments of 1996 (31 U.S.C. 7501-07), if the Applicant expended \$750,000 or more in Federal awards in its most recent fiscal year, such documentation must include a certification from, or a copy of, the most recent audit by the Applicant's independent public accountant attesting to the fact that the Applicant maintains internal controls over federal awards, complies with applicable laws, regulations, and contract or grant provisions, and prepares appropriate financial statements. The Applicant will have at least 30 calendar days to respond to this requirement. If an Applicant does not respond within the prescribed time or responds with insufficient documentation, then HUD may determine that the Applicant has not met this requirement and may withdraw the award offer. If an Applicant has not expended \$750,000 or more in federal awards in its most recent fiscal year, HUD, or its assignee may conduct an audit of the Applicant's financial system. HUD will work with the Applicant to meet Federal financial management system standards prior to HUD releasing funds.

Indirect Cost Rate

Normal indirect cost rules under [2 CFR part 200, subpart E](#) apply. If you intend to charge indirect costs to your award, your application must clearly state the rate and distribution base you intend to use. If you have a Federally negotiated indirect cost rate, your application must also include a letter or other documentation from the cognizant agency showing the approved rate. Successful applicants whose rate changes after the application deadline must submit the new rate and documentation to assure the award agreement incorporates the applicable rate.

Applicants other than state and local governments. If you have a Federally negotiated indirect cost rate, your application must clearly state the approved rate and distribution base and must include a letter or other documentation from the cognizant agency showing the approved rate. If your organization does not have a current negotiated rate (including provisional rate) and elects to use the de minimis rate, your application must clearly state you intend to use the de minimis rate of 10% of Modified Total Direct Costs (MTDC), as defined at [2 CFR 200.1](#). Costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both, as described in [2 CFR 200.403](#). Once elected, the de minimis rate must be applied consistently for all Federal awards until the organization chooses to negotiate a rate, which the organization may apply to do at any time. Documentation of the decision to use the de minimis rate must be retained on file for audit.

State and local governments. If your department or agency unit has a Federally negotiated indirect cost rate, your application must include that rate, the applicable distribution base, and a

letter or other documentation from the cognizant agency showing the negotiated rate. If your department or agency unit receives more than \$35 million in direct Federal funding per year, you may not claim indirect costs until you receive a negotiated rate from your cognizant agency for indirect costs as provided in [Appendix VII to 2 CFR part 200](#).

If your department or agency unit receives no more than \$35 million in direct Federal funding per year and your department or agency unit has developed and maintains an indirect cost rate proposal and supporting documentation for audit in accordance with [2 CFR Part 200, Appendix VII](#), you may use the rate and distribution base specified in that indirect cost rate proposal.

Alternatively, if your department or agency unit receives no more than \$35 million in direct Federal funding per year and does not have a current negotiated rate (including provisional) rate, you may elect to use the de minimis rate of 10% of MTDC. As described in [2 CFR 200.403](#), costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both. Once elected, the de minimis rate must be applied consistently for all Federal awards until your department or agency chooses to negotiate for a rate, which you may apply to do at any time. Documentation of the decision to use the de minimis rate must be retained on file for audit.

G. Other Submission Requirements

1. Standard Application, Assurances, Certifications and Disclosures

Standard Form 424 (SF-424) Application for Federal Assistance

The SF-424 is the government-wide form required to apply for Federal assistance programs, discretionary Federal grants, and other forms of financial assistance programs. You must complete and submit the form with the other required forms and information as directed in this NOFO.

By signing the forms in the SF-424 either through electronic submission or in paper copy submission (for those granted a waiver), you and the signing authorized organization representative affirm that you both have reviewed the certifications and assurances associated with the application for Federal assistance and (1) are aware the submission of the SF-424 is an assertion that the relevant certifications and assurances are established and (2) acknowledge that the truthfulness of the certifications and assurances are material representations upon which HUD will rely when making an award to the applicant. If it is later determined the signing authorized organization representative to the application made a false certification or assurance, caused the submission of a false certification or assurance, or did not have the authority to make a legally binding commitment for the applicant, the applicant and the individual who signed the application may be subject to administrative, civil, or criminal action. Additionally, HUD may terminate the award to the applicant organization or pursue other available remedies. Each applicant is responsible for including the correct certifications and assurances with its application submission, including those applicable to all applicants, those applicable only to Federally recognized Indian tribes, or Alaskan native villages and those applicable to applicants other than Federally recognized Indian tribes, or Alaskan native villages.

Assurances (HUD 424-B)

By submitting your application, you provide assurances that, if selected to receive an award, you will comply with U.S. statutory and other requirements, including, but not limited to civil rights

requirements. All recipients and subrecipients of the award are required to submit assurances of compliance with federal civil rights requirements. *See, e.g.*, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments Act of 1972, Section 504 of the Rehabilitation Act of 1973, Violence Against Women Act, and the Age Discrimination Act of 1975; *see also* [24 C.F.R. §§ 1.5; 3.115; 8.50; and 146.25](#). HUD accepts these assurances in the form of the HUD 424-B, which also require compliance with HUD Reform Act requirements and all general federal nondiscrimination requirements in the administration of the federal assistance award.

Applicant Disclosure Report Form 2880 (HUD 2880)

The form HUD 2880 is required if you are applying for assistance within the jurisdiction of HUD to any project subject to Section 102(d) of the [HUD Reform Act](#). Assistance is provided directly by HUD to any person or entity, but not to subrecipients. It includes assistance for the acquisition, rehabilitation, operation, conversion, modernization, renovation, or demolition of any property containing five or more dwelling units that is to be used primarily for residential purposes. It includes assistance to independent group residences, board and care facilities, group homes and transitional housing but does not include primarily nonresidential facilities such as intermediate care facilities, nursing homes and hospitals. It also includes any change requested by a recipient in the amount of assistance previously provided, except changes resulting from annual adjustments in Section 8 rents under Section 8(c)(2)(A) of the United States Housing Act of 1937 ([42 U.S.C. 1437f](#)). *See* [HUD Reform Act regulation for additional information](#).

Code of Conduct

Both you, as the award recipient, and all subrecipients must have a code of conduct (or written standards of conduct). The code of conduct must comply with the requirements included in the “Conducting Business in Accordance with Ethical Standards” section of the [Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards](#), as well as any program-specific requirements. These requirements include ethical standards related to conflicts of interest for procurements in [2 CFR 200.318\(c\)](#) and [2 CFR 200.317](#), as well as HUD-specific conflict of interest standards. 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.

Affirmatively Furthering Fair Housing

With some exceptions for Federally recognized Indian tribes and their instrumentalities, the application must discuss how the applicant will carry out the proposed activities in a manner that affirmatively furthers fair housing in compliance with the Fair Housing Act and its implementing regulations, and how applicants will meet the requirements of the definition of AFFH at 24 CFR 5.151. Applicants may propose activities that are consistent with their jurisdiction’s Analysis of Impediments (AI), an Assessment of Fair Housing (AFH), or other means of fair housing planning that meaningfully supports their AFFH certification.

If the applicant will carry out proposed activities in a jurisdiction with an AFH, the proposed activities should be consistent with the AFH’s fair housing goals and with fair housing strategies specified in the jurisdiction’s Consolidated Plan or Public Housing Agency Plan.

Applicants will respond to this requirement in response to Rating Factor 2(2) NOFO Priorities, Priority 1: Affirmatively Furthering Fair Housing.

2. Other Program-Specific Requirements

V. APPLICATION REVIEW INFORMATION

A. Review Criteria

1. Rating Factors

Criteria. Applications will be evaluated competitively according to the Rating Factors for Award described below and ranked against all other applicants. See table below for a summary of the Rating Factors and Sub Factors, their point values and information on whether to use the charts or provide separate narratives. Total maximum points for this award are 100.

RATING FACTOR		POINTS	CHART	<u>NARRATIVE</u>
RF1	Capacity of the Applicant	35		
RF1(1)	Capacity/Experience of Organization	14	Chart A, Past Performance	Narrative on Training Experience
RF1(2)	Performance/Grant Requirements	10	N/A	Narrative required only if applicant has not received a HUD HC Training grant for HUD FY 21 Sub factor 2.1 (goals)
RF1(3)	Measuring Student Satisfaction	6	Chart A. Past Performance	Narrative on Student Satisfaction
RF1(4)	Scholarships	5	Chart A, Past Performance, Columns K, L & M	N/A
RF2	Need/NOFO Priorities	10		
RF2(1)	Needs Data	7	N/A	Narrative on Needs
RF2(2)	NOFO Priorities	3	N/A	Priorities 1 and 2, Narratives on AFFH and

				Mobility Counseling
RF3	Soundness of Approach/ Scope of Housing Counseling Training Services	40	Comprehens	
RF3(1)	Past Performance - Impact	5	(1) Chart C, Actual Expenditures Chart A, Column L	(0) Scholarships. (1) Include narrative on actual expenditures
RF3(2)	Work Plan	19	Chart B, Proposed Performance, Columns C, D, E	(1)(a) Course outline for each class (1) (b) (1) (c) (2), (3), (4), (5)
RF3(3)	Scholarships and Fees	10	N/A	Narrative on scholarships and fees
RF3(4)	Training Partners	3	Chart E	(d) (1) and (2)
RF3(5)	Management Activities	3	N/A	Narrative
RF4	Leveraging Resources	5		
RF4(A)	Itemize Leveraging	3	Chart D	N/A
RF4(B)	Fees	2	Chart D	N/A
RF5	Achieving Results and Program Evaluation	10		
RF5(a)	Evaluation Plan	4	N/A	Narrative on Information Collection, Data Analysis and Work Plan Adjustments
RF5(b)	Grant Expenditure History	6	N/A	Only if Applicant has not received a HUD HC Training grant for HUD FY 21

Rating Factors for Award Used to Rate and Rank Applications. The Rating Factors for award, and maximum points for each factor, are outlined below. These Rating Factors will be

used to evaluate applications. The maximum score is 100 for all applicants. HUD may rely on other information, such as performance reports, financial status information, monitoring reports, audit reports and other information available to HUD in making score determinations under any Rating Factor.

Rating Factor 1: Capacity of the Applicant

Maximum Points: 35

HUD uses responses to this Rating Factor to evaluate the Applicant's readiness to begin and ability to implement the proposed work plan detailed in Rating Factor 3.

1. Capacity/Experience of Organization (14 points)

Using HUD-92910 **Chart A, Past Performance**, Using HUD-92910 **Chart A, Past Performance**, all Applicants must provide the requested information for all housing counseling courses including those required for certifications such as foreclosure and advanced foreclosure certification that the Applicant and any Applicant partners provided during the FY 2021 Grant Period of July 1, 2021 through September 30, 2022. See instructions for completion in Chart A, Past Performance tab. Also indicate in the narrative response:

- Total years of experience by the Applicant as an organization providing housing counseling training and total number of housing counselors who have participated in your training program in the last three grant years, October 1, 2019, to September 30 2022.
- Total years of experience by the Applicant as an organization providing web-based (interactive or non-interactive), or other forms of remote training;
- Average years of housing counseling trainer experience for proposed trainers; and
- Relevant experience providing training in a manner that is effective for persons with disabilities and persons with limited English proficiency, including in-person, web-based, and other forms of remote training.

2. Performance/Grant Requirements (10 Points)

Applicants that did not receive a HUD Comprehensive Housing Counseling grant or HUD Housing Counseling Training Program grant funding during the FY 2021 Grant Period of July 1, 2021, through September 30, 2022, must provide a response to this sub-factor. Previous HUD grantees may respond to this sub factor, but are not required to do so, as HUD may utilize its own records to score regarding these compliance issues.

In scoring this section, HUD will evaluate performance relative to goals and how well the Applicant has satisfied the requirements, including reporting, on HUD or other grants received. If an Applicant has not received a HUD Housing Counseling Training grant for the period July 1, 2021, through September 30, 2022, the Applicant should base its response on activities and requirements under HUD's Housing Counseling program, other HUD grants, or other sources of funding, such as other federal, state, local, or other awards. For non-HUD training grants, provide contact information of funding providers.

- Goals and Accomplishments. Describe performance relative to quarterly and annual reports submitted for FY 2019 training grant awards or other goals set during the FY 2021 Grant Period of July 1, 2021, through September 30, 2022, and approved extensions. Indicate whether funds were fully spent, goals were met, and explain why

they were not, if applicable. If an extension was required, explain reason for not expending funds within the grant period.

- **HUD Oversight / Audits / Financial & Administrative Reviews.** Significant findings on oversight, Financial & Administrative Reviews and audits conducted by HUD staff, HUD contractors and/or HUD's Inspector General will be taken into consideration when scoring this section. Significant findings may be findings that suggest an Applicant has operated its agency in a manner inconsistent with the Housing Counseling Program or other HUD program requirements, including waste, fraud and abuse of grant funds and contrary to fair housing or other civil rights requirements. HUD will develop and apply a scoring scale based on the number of significant findings documented during a review(s) and/or audit(s), and incidence of repeat findings, complaints, etc. HUD will also factor in the Applicant's responsiveness to findings and implementation of corrective action, as well as substantiated complaints received about the organization. HUD may also factor in frequency and responsiveness to complaints, the Applicant's responsiveness to findings and implementation of corrective action, grantee performance/reporting, and counseling activity reporting. For agencies not receiving a HUD grant, provide information and documentation pertaining to oversight and audits of governing entities.

3. Measuring Student Feedback (6 points)

Scoring in this section will reward Applicants that measure student feedback and make course and/or test adjustments as a result of student feedback. In addition to completing Chart A, Applicants must attach a separate narrative that:

- a. Describes the process to collect student feedback data;
- b. Summarizes data collected during the FY 2021 Grant Period of July 1, 2021 through September 30, 2022;
- c. Attach a copy of the data collection instruments utilized, if applicable; and
- d. Describes the course and/or test adjustments made as a result of student feedback during the FY 2021 Grant Period of July 1, 2021 through September 30, 2022.

4. Scholarships - (5 points) Chart A, Past Performance, Columns K & L - List the number of scholarships provided during the FY 2021 Grant Period of July 1, 2021 through September 30, 2022.

Rating Factor 2: Need/NOFO Priorities

Maximum Points: 10

This Rating Factor addresses the Applicant's assessment of the need for training services for housing counselors and the extent to which the proposed activities described in response to Rating Factor 3 address these needs, in addition to certain NOFO Priorities.

1. Needs Data (7 Points) Answer the following:

- a. **Counselor Needs.** Estimate the total number of counselors who may require general housing counseling training in FY2024. Explain how the Applicant estimated this number.
- b. **Training Needs.** Describe and document the overall need and demand for each of the

proposed training activities and delivery methods (place-based, online-interactive, and on-line non-interactive) based on current market conditions.

c. Under-served and Underrepresented Populations. Indicate how the Applicant and Training Partners propose to train counselors who serve communities with LEP, rural, lower income, persons with disabilities and other under-served and underrepresented housing consumer populations, as well as geographic communities that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as defined in Executive Orders 14091, 14020, and 13985 as well as being exemplified by the list in the definition of “equity” above. Rural Areas are defined by the U.S. Department of Agriculture at 7 CFR 3550.10. Applicants must also describe how its housing counseling training activities will provide access to persons with disabilities, including making reasonable accommodations as necessary and how they will take steps to provide meaningful access to persons with LEP.

d. Incorporating Needs into Training Plan. Explain how Applicant will incorporate the training needs described above for determining training activities, delivery methods, locations to offer classroom training if applicable, and awarding scholarships. Applicants should apply this methodology in detail when responding to Rating Factor 3 B.2 (a), Scholarships.

2. NOFO Priorities (3 Points)

The total number of points an Applicant can receive under this sub-factor is three (3). Priority 1 has a point value of two (2) points, and Priority 2 has a point value of one (1) point. An Applicant must address Priority 1: Affirmatively Furthering Fair Housing, for which a maximum of two (2) points is available. Applicants must limit responses to 500 words for each NOFO priority.

The following priorities apply to the Housing Counseling Training funding for the purpose of this NOFO. Indicate if, and describe how, the Applicant's training work plan substantively addresses the NOFO priority.

Priority 1: Affirmatively Furthering Fair Housing.

a. Staff and Counselor Training (2 points): Applicants must affirmatively further fair housing in their use of grant funds, per Section 808(e)(5) of the Fair Housing Act. Each recipient, consistent with HUD's AFFH regulations at 24 CFR 5.151 and 5.152, is required to submit a certification that it will affirmatively further fair housing. Applicants must provide a brief description of any meaningful action the Applicant will take that is consistent with the obligation to AFFH, which can include but not be limited to the activities listed in Section III.F. Applicants must describe how their proposed NOFO activities are aligned with Affirmatively Furthering Fair Housing (AFFH) requirements. Specifically, applicants should describe how their proposed NOFO activities will work towards one or more of the following: 1) addressing disparities in access to opportunity for protected class groups; and/or 2) fostering and maintaining compliance with civil rights and fair housing. For example, an Applicant could describe how they will address disparities in access to opportunity for protected class groups by training housing counselors on how to maintain a database of accessible housing opportunities in the community for use by persons with disabilities, provide mobility counseling to help persons move and access affordable housing in the community, or training on how to provide in-language counseling to persons who are Limited English Proficient (LEP) to assist them with lending, establishing credit, or accessing relevant financial services. Applicants could also describe how they are training HUD-approved housing counseling organizations how to foster and maintain

compliance with civil rights and fair housing laws by providing individuals with education, or information on housing discrimination and the rights and remedies available.

Applicants must also provide a description of any meaningful action that is consistent with the obligation to affirmatively market the housing counseling training activities provided by this grant.

Applicants must demonstrate that they will train their staff and counselors on fair housing and civil rights laws, that they have a method of providing their clients with information about their fair housing rights, and that they have established a mechanism for referring potential fair housing violations to HUD, state or local fair housing agencies, or private fair housing groups. For example, an Applicant demonstrates that it has entered into a memorandum of understanding with a fair housing enforcement agency that will provide fair housing training and informational materials and accept referrals of potential fair housing complaints; and,

b. Mobility Counseling (1 point): Applicants must describe how they will train housing counselors to provide clients with mobility counseling and what information Applicants will train counselors to furnish to clients that will enhance their housing choices outside of areas of minority and poverty concentration.

Priority 2: Lead-Based Paint. (1 point) Applicants may earn one (1) point by describing how they will train housing counselors to inform clients about lead-based paint. Housing counselors that provide education or counseling regarding Pre-Purchase/Home Buying, or Locating, Securing, or Maintaining Residence in Rental Housing, are to be encouraged to inform clients about their rights and responsibilities under the HUD Lead-Based Paint Disclosure Rule (24 CFR part 35, Subpart A), and, if the rental or purchase may be HUD-assisted, requirements of 24 CFR part 35, sub-parts B, K, and R.

Rating Factor 3: Soundness of Approach/Scope of Housing Counseling Training Services
Maximum Points: 40

This Rating Factor addresses past performance and the quality and effectiveness of the proposed work plan. In rating this factor, HUD will evaluate the extent to which the Applicant presents a detailed and sound approach for providing the proposed services. HUD will also evaluate the extent to which the Applicant demonstrates the cost-effectiveness of its activities, and convincingly explains how the proposed activities will yield long-term results.

A. Past Performance - Impact (5 points) - To score this factor, HUD will analyze the Actual Expenditures and Cost per Student during FY 2021 Grant Period of July 1, 2021 through September 30, 2022.

- **Actual Expenditures - HUD-92910 Chart C- Budget** - HUD will evaluate the Applicant's submitted detailed, comprehensive report of actual expenditures from all funding sources during the FY 2021 Grant Period of July 1, 2021 through September 30, 2022. At a minimum, the report must include salaries, fringe and other benefits, consultant/trainer expenses, travel (staff, trainers), scholarships, rent (office and training venues), phone, postage, supplies, technology/equipment, and indirect costs for

administration of the Applicant's FY2021 training program. Use Chart C to submit this information and provide a narrative on actual expenditures. Applicants must explain expenses in excess of ten percent (10%) of the overall budget that did not result in the direct provision of training services and were not supported by an approved Negotiated Indirect Cost Rate Agreement (NICRA) or an indirect cost rate. Narrative must be provided to receive full points. If the Applicant did not receive a HUD Housing Counseling Program Training Grant during this time period, provide this information based on the Applicant's entire training budget for the same period. If applicable, the report should also include sub-grants or allocations to Training Partners. Applicants must explain expenses in excess of ten percent (10%) of the overall budget that did not result in the direct provision of training services and were not supported by an approved NICRA or an indirect cost rate.

- **Cost per Counselor - HUD-92910 Chart A Past Performance** - Calculate the cost per counselor by dividing the Total Expenditures (All Sources) on Chart C by the total number of counselors shown in Column D, Chart A Past Performance. Enter this number in Column M. Explain any factors that may have impacted the cost per counselor such as number and type of scholarships, locations, or other training expenses.
- **Scholarships** - Describe in a narrative the number of scholarships and percentage of the HUD Housing Counseling Program Training grant was spent on travel, lodging, and/or tuition during the FY 2021 Grant Period of October 1, 2021 through September 30, 2022. If the Applicant did not expend a HUD Housing Counseling Program Training grant during this time period, provide this information based on the applicant's entire training budget for the same period. If applicable, explain any adjustments made to allocation of scholarships based on changed needs. Also include the number and type of counseling scholarships issued for housing counseling certification, HECM default counseling, Disaster Prevention and Recovery, and scholarships issued to persons enrolled in a HUD-certified Housing Counselor Workforce Development Program sponsored by the TNOFO grantee and an institution of higher education including an HBCU, TCU or other MSI made available during the grant period of performance July 1, 2021 through September 30, 2022, if applicable.

B. Work Plan (19 points).

The Work Plan must describe in detail how the Applicant plans to develop and administer the proposed training services, including administrative tasks, marketing, scholarships, and compliance with all required fair housing and civil rights provisions, including the requirements to AFFH and ensure compliance with the Federal Electronic and Information Technology Accessibility and Compliance Act, Section 508.

1. Housing Counseling Training. The Applicant must describe each course it plans to offer and indicate which of the housing counseling Eligible Activities listed in section III. F. the Applicant proposes to address in each course. Applicants must denote any national standards that may have been incorporated into the development of the curriculum. HUD will award higher points to those Applicants that include courses that support Disaster Preparation and Recovery, Housing Counseling for Renters, Foreclosure Prevention, Financial Stability, and Sustainable Home Ownership.

a. Proposed Curriculum - HUD-92910 Chart B. Proposed Performance. Complete this chart and provide the following:

1) Provide a summary list of proposed courses.

2) Provide a course outline (no more than 2 pages per course) with the following information:

- Course title.
- Brief course description.
- Delivery type.
- Instructional goals.
- Course length for classroom and web-based sessions.
- All course topics to be covered and learning objectives for each course. Learning objectives must encompass comprehension, application, analysis, and synthesis cognitive levels of learning.
- Understanding and comprehension explaining how learning checks are incorporated into classroom and web-based courses.
- If applicable, how the course supports one or more of the Strategic Objectives outlined in the 'FY2022-2026 Strategic Plan: One HUD, For All' noted in Article I, Section A.2 above.
- Privacy and security policies in place to ensure counselors taking remote training courses are protected, and how the remote training will be conducted in a way that verifies the identity of the student and eliminates the opportunity for fraud, cheating, and any other circumstances that would result in questioning the veracity, impact, and applicability of the training.
- Identify what criteria, including a course examination, will be established for successful completion of the course.
- If applicable, indicate the type of counselor certification this course will be used for.
- Describe the process through which curriculum is developed. Describe research conducted and indicate experts consulted for curriculum or test content development.

b. Administrative Staff and Trainers.

1. Number of administrative staff devoted to training program management for training activities under the application.
2. Number of trainers to be utilized for the proposed courses.
3. Describe how trainers are selected and the specific selection criteria employed.
4. Describe how the Applicant will monitor trainers including student feedback.

c. Delivery Methods. As outlined in 92910 Chart B- Proposed Performance, Column B, Indicate the delivery method to be used for each course to be offered, (i.e., "web-based" or "in-person").

1. Indicate the number of proposed courses to be offered (Column C) and the number of counselors to be trained (Column D).
2. Also, Applicants must describe in a narrative how the proposed delivery method(s) will be accessible to persons with disabilities.

d. Affirmative Marketing / Enrollment. Applicants must describe plans to market the training and register counselors. Describe policies and plans to ensure training enrollment and assistance

provisions are marketed broadly, including efforts taken to market to any eligible housing counseling organizations that would be unlikely or least likely to be aware of the opportunities for training, enrollment, and assistance absent such efforts, or housing counseling organizations that serve groups unlikely or least likely to otherwise receive housing counseling services. For example, how will the Applicant ensure that enrollment, eligibility and scholarships may not be restricted to Affiliates or Branches of a specific intermediary or conducted in a way that favors Affiliates or Branches of a particular organization. Describe how affirmative marketing efforts contribute to ensure that existing housing counseling capacity in rural, under-served and underrepresented populations is preserved and expanded. (1) Describe how marketing, enrollment, registration, and requests for assistance services or reasonable accommodation will effectively communicate with persons with disabilities and will also provide meaningful access to persons with LEP; (2) Describe plans to take reasonable steps to provide meaningful access to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964, for example, providing materials that are available in languages other than English. Applicants may refer to the Department's January 22, 2007 Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732).

e. Recipients must ensure that communication with individuals with disabilities is as effective as communication with individuals without disabilities. Describe the auxiliary aides and services available that will ensure that marketing, enrollment, registration, and other notices are communicated as effectively to individuals with disabilities as to individuals without disabilities.

f. Limited English Proficiency. Recipients must take reasonable steps to ensure meaningful access to their programs and activities for persons with Limited English Proficiency (LEP). (1) Describe how, in curriculum development and implementation, a strong emphasis is placed on academic content to effectively serve persons with limited English proficiency, under-served and under-represented populations. (2) Describe the reasonable steps that will be taken to provide meaningful access to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964, for example, providing materials that are available in languages other than English. Applicants may refer to the Department's January 22, 2007 Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732).

g. Affirmatively Furthering Fair Housing. Under Section 808(e)(5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients. In the narrative responses to the Rating Factor 3 (2)(f), Applicants must describe the organization's training, outreach and other activities that affirmatively market fair housing information. Applicants must describe activities they will do that affirmatively furthers fair housing. Applicants should show what training will be provided to counselors to conduct the targeted outreach and to provide housing counseling services to under-served and underrepresented housing consumer populations.

h. Federal Electronic and Information Technology Accessibility and Compliance Act, Section 508. Applicants offering training on-line must describe how they comply with Section 508 requirements. Please visit www.section508.gov for more details.

2. Scholarships and Fees. (10 Points). Applicants must describe scholarships and fees for each proposed activity described within Section V.B-Work Plan.

(a) Scholarships. The proposal must include a scholarship element, detailing the full or partial costs to be covered, including travel (lodging, transportation and per diem), and tuition to be awarded to housing counselors. Indicate if scholarships will be made available to:

1. Counselors and staff employed by HCAs participating in HUD's Housing Counseling Program;
2. Individuals enrolled in HUD certified housing counselor workforce development programs, including military veterans and transitioning service members, administered by the TNOFO grantee. Individuals must be sponsored by a HUD participating housing counseling agency to qualify; and/or
3. Individuals enrolled in a HUD certified housing counselor workforce development program sponsored by the TNOFO grantee and an institution of higher education including, but not limited to, an HBCU, TCU, or other MSI, as additional funds may be available for these scholarships.

Describe the types of scholarships that will be offered to students both through this NOFO, as well as through leveraged non-federal resources, and the methodology applied for issuing scholarship awards. Discuss plans to maximize the number of scholarships awarded. Estimate what percentage of the proposed budget will be earmarked for scholarships, with a breakdown for tuition and travel (lodging, transportation and per diem). Applicants must also describe plans for determining how the various types of scholarship assistance will be distributed based on the needs identified in Rating Factor 2 including assistance for counselors in rural areas, under-served and underrepresented populations nationwide, while also reducing travel costs for local participants or areas with limited housing counseling resources, limited English proficiency housing counselors.

Describe the methodology used to determine types of scholarships made available to Applicants at the beginning of the application process. Include the anticipated number and type (lodging, tuition only, tuition & travel) of each type of counseling scholarship noted above that will be made available during the grant period of performance October 1, 2023 through September 30, 2024.

(b) Fees. If applicable, indicate the fee the Applicant plans to charge for each proposed activity for those students that do not receive a scholarship for tuition.

3. Training Partners. (3 points) (See definitions of Training Partners in Section I.A.4-Program Definitions, and Sub-recipients in Section I.A.3-Standard Definitions). List in HUD-92910 Chart E, Column B, the name of the identified sub-recipients and/or Training Partners that will enable the Applicant to successfully implement the proposed work plan and explain in a narrative the role each partner will play in logistical support, marketing and outreach for the proposed activities and the impact on cost-effectiveness. Participation by training partners shall be limited

to services procured by Grantees and Sub-grantees. Applicants may utilize in-house staff, sub-recipients, consultants, and Training Partners with requisite experience and capacity. Indicate the partner's name, type of entity, contact person and phone number of partner, number of events, if the partner is past and/or proposed and the amount of funding the Training Partner contributed or will contribute to that training. This section will be scored on the number of Training Partners identified for past and proposed training projects, their role in the proposed training and, their demonstrated experience in past training. Their contributions for proposed training plans will be included as leveraged funding for RF4.

- a. Past Training Partners - Provide information on the number of partnerships created during the period of October 1, 2021 through September 30, 2022,, which includes the extension period of performance, and what each partner contributed to assist in providing more training opportunities for counselors and/or reduced the cost and/or burden to the grantee as indicated in HUD-92910 Chart E.
- b. Proposed Training Partners - Identify Training Partners proposed for FY 2024 that will assist in providing more training opportunities for counselors and/or reduce the cost and/or burden to the grantee as indicated in HUD-92910 Chart E. Those Applicants that have established Training Partners will score higher on this sub factor.

4. Management Activities (3 points). Applicants must describe management activities that will be performed as part of the projected work plan, including monitoring and oversight of agency staff and if applicable, sub-recipients and/or Training Partners. Also describe what process will be used to select proposed sub-recipients and/or Training Partners and to determine sub-funding levels.

Rating Factor 4: Leveraging Resources
Points: 5

Maximum

Although HUD funding through this NOFO may fully fund an organization's proposed program, Applicants are encouraged to leverage other resources to supplement the HUD award. Points for this Rating Factor will be awarded based on the amount of leveraged funding that meets the criteria in this section. Applicants that can demonstrate leveraged resources from Training Partners described in Rating Factor 3-B, will receive higher scores in this factor. Applicants who have no other resources available will receive no points for this Rating Factor. Do not include the same leveraged resources that were submitted for the 2024 Housing Counseling Program Comprehensive Grant application. Resources identified for the 2024 Housing Counseling Program Comprehensive Grant application cannot be claimed again as a leveraged resource for the 2023 Housing Counseling Training Grant Program application.

Applicants will be evaluated based on their ability to show that they have obtained additional non-Federal resources for their housing counseling training activities, for the period, including: direct financial assistance (grants); fees; and in-kind contributions such as services, equipment, office space, labor; etc. Resources may be provided by non-federal government sources, public or private non-profit organizations, for-profit private organizations, or other entities committed to providing assistance. Grantees will be required to maintain evidence that leveraged funds cited in this application were actually provided to the agency. Funding files, leveraging files, or both, will be reviewed by HUD staff as a part of the performance reviews and on-site monitoring

visits.

Do NOT include funding from federal sources such as, but not limited to, the Community Development Block Grant (CDBG) Program, Fair Housing Initiatives Program (FHIP), and Home Investment Partnerships Program (HOME).

Attorneys General Mortgage Settlement funds are not considered Federal and therefore can count toward leveraging.

A. Itemize Leveraging (5 Points) Utilize Chart D - Leveraging Resources and HUD-92910 Chart E - Funds from Training Partners to provide the following information:

- HUD-92910 Chart D - Leveraging Resources (3 points)
- HUD-92910 Chart E - Funds from Training Partners (2 points)

All Applicants must itemize the list of leveraged resources for the Applicant itself, and for each proposed sub-grantee and identified Training Partner. All Applicants must provide a list of all proposed sub-grantees they propose to fund and itemize for each the names of the organizations providing all leveraged funds and in-kind contributions. Include the total amount and the source of funds. Applicants must list all identified Training Partners with the funds earmarked by the Training Partners to support the training. Applicants that fail to provide this information may not receive any points for this factor. All leveraged resources claimed by an Applicant, including cash and third party in-kind, must meet all the criteria set forth in 2 CFR Part 200. Responses should be consistent with the leveraged funds amount shown on the SF424, and the documentation for this Rating Factor.

Resources provided by the Applicant may count as leveraged resources. These amounts must include only funds that will directly result in the provision of housing counseling training. These funds must also be reflected in the SF424.

B. Fees. While agencies are strongly encouraged to aggressively leverage funds from other private and public sources, fee income can be counted as leveraged resources. Applicants claiming fee income must project the total income anticipated from fees. Fee income should be identified as program income on line 18. Estimated Funding, f. Program Income of SF-424 “Application for Federal Assistance”.

Rating Factor 5: Achieving Results and Program Evaluation

Maximum Points: 10

This Rating Factor emphasizes HUD's determination to ensure that Applicants meet the commitments made in their applications and cooperative agreements and assess their performance in achieving agreed upon performance goals. This factor reflects HUD's Strategic Goal to embrace high standards of ethics, management and accountability. In scoring this section, HUD will consider Applicant methodologies used to evaluate overall program performance and whether the Applicant submitted their organization's transition or succession plan.

a. Evaluation Plan. (4 points) In responding to this factor, Applicants must indicate how they evaluate the impact of the training program. The Applicant must describe an evaluation plan that explains what will be measured, how an Applicant is going to measure it, and the steps in place to adjust its work plan if performance targets are not met within established time frames. Specifically, the plan must identify:

1. **Information Collection.** Describe the Applicant's procedures for measuring the impact of the training program. The Applicant must describe how student feedback, learning checks, testing results, and any other data will be collected or measured to evaluate the success of the proposed training program. The Applicant must also explain how results of marketing and outreach efforts, especially outreach to counselors in and serving rural areas will be measured. For this NOFO, HUD will give particular weight to an applicant's ability to measure change in housing counselor's knowledge and skills as a result of the training offered.
2. **Data Analysis and Work Plan Adjustments.** Indicate how the information collected will be evaluated, and the steps the Applicant has in place to adjust the work plan if performance targets are not met within established time frames or student feedback indicates need to revise teaching methodology.

b. Grant Expenditure History (6 points) In scoring this section, HUD will utilize its own records to evaluate Applicant compliance with programmatic requirements and expenditure results during the FY 2021 grant period of July 1, 2021 through September 30, 2022. Applicants that were unable to expend HUD grant funds within the designated performance period(s) will not receive full points.

If an Applicant has not received a HUD Housing Counseling Training grant for the prior grant period, the Applicant should base its response on activities and requirements under other sources of funding, such as other federal, state, local, or other awards. Provide contact information of all funders. Applicants that were unable to expend grant funds from all sources within the designated performance period(s) will not receive full points.

Maximum Points: 100

This program does not offer points for Section 3.

2. Other Factors

Preference Points

This program does not offer any preference points.

You may choose to voluntarily commit to address policy initiatives in your application. Addressing these policy initiatives is not a requirement to apply for or receive an award. If you choose to address a voluntary policy initiative in your application, however, you will be required to adhere to the information submitted with your application should you receive an award. The proposed information will be included as a binding requirement of any federal award you receive as a term and condition of that award.

This program does not offer points for Climate Change

This program does not offer points for Environmental Justice.

This program does not offer preference points related to HBCUs.

Pursuant to Executive Orders [13985](#), [14041](#), [14045](#), and [14031](#), you may receive up to two (2) preference points if you are an applicant designated as a minority-serving institution (MSI) or if your application proposes one or more partnerships with minority-serving educational institutions that have been historically underserved.

This program does not offer preference points related to minority-serving institutions.

This program does not offer Promise Zone preference points.

B. Review and Selection Process

1. Past Performance

In evaluating applications for funding, HUD will consider an applicant's past performance in managing funds. Items HUD will consider include, but are not limited to:

OMB-designated repositories of governmentwide data, as noted in [2 CFR 200.206\(a\)](#)

The ability to account for funds in compliance with applicable reporting and recordkeeping requirements

Timely use of funds received from HUD

Timely submission and quality of reports submitted to HUD

Meeting program requirements

Meeting performance targets as established in the grant agreement

The applicant's organizational capacity, including staffing structures and capabilities

Timely completion of activities and receipt and expenditure of promised matching or leveraged funds

The number of persons served or targeted for assistance

Timely use of funds received from HUD

HUD may reduce scores based on the past performance review, as specified under V.A. Review Criteria. Whenever possible, HUD will obtain and review past performance information. If this review results in an adverse finding related to integrity of performance, HUD reserves the right to take any of the remedies provided in the [Pre-Selection Review of Performance section of the Eligibility Requirements for Applicants of HUD Financial Assistance Programs](#).

2. Assessing Applicant Risk

In evaluating risks posed by applicants, HUD may use a risk-based approach and may consider any items such as the following:

(1) Financial stability;

(2) Quality of management systems and ability to meet the management standards prescribed in this part;

(3) History of performance. The applicant's record in managing Federal awards, if it is a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, failing to make significant progress in a timely manner, failing to meet planned activities in a timely manner, conformance to the terms and conditions of previous Federal awards, and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards;

(4) Reports and findings from audits performed under Subpart F—Audit Requirements of this part or the reports and findings of any other available audits; and

(5) The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities.

a. Integrity. HUD evaluates the integrity of the Applicant as reflected in government-wide websites, information in HUD's files, the federal Do Not Pay portal, public information and information received during HUD's Name Check Review process. If this integrity evaluation results in an adverse finding, HUD reserves the right to take any of the remedies provided in Section III.C.4.a.5, Do Not Pay Website Review.

b. Technical Review. First, each application will be reviewed for technical sufficiency to determine whether the application meets the threshold requirements set out in this NOFO and whether all required forms have been submitted. Applications that do not meet the threshold requirements will not be rated and ranked.

c. General Review. The second review considers the responses to the Rating Factors outlined above and other relevant information. Applications will be evaluated competitively and ranked against all other Applicants that applied in the same funding category.

d. Funding Methodology.

1. Within the overall availability of funds, applications that earn a score of seventy-five (75) points or more will receive a base amount, as determined by HUD. The second tier of funding will be based on the total number of HUD scholarships awarded in FY2021 Grant Period of July 1, 2021 to September 30, 2022. The third tier of funding will be based on the total number of classes provided during FY2021 Grant Period of July 1, 2021 to September 30, 2022. The fourth tier of funding will be based on the proposed number of HUD scholarships for institutions of higher education including an HBCU, TCU or other MSI.
2. HUD may award the entire amount available under this NOFO to the highest scoring application. However, to provide the highest quality, comprehensive, and nationwide training program, HUD reserves the right to make multiple awards.
3. In the event of multiple awards, awardees will be funded based on a formula determined by HUD.
4. If an Applicant turns down an award offer, HUD may make an offer to the next highest-ranking application.
5. In the event HUD commits a funding error, that when corrected would result in selection of an Applicant during the funding round of a Program NOFO, HUD may select that Applicant for funding, subject to the availability of funds.

e. Award Adjustments. HUD reserves the right to adjust funding levels for each Applicant as indicated in Section II.C. of this NOFO.

3. Experience Promoting Racial Equity

In evaluating applications for funding, HUD will consider the extent to which the application demonstrates that the applicant has the experience and the resources to effectively address the needs of underserved communities, particularly Black and Brown communities. This may include experience successfully working directly with such groups, experience designing or operating programs that equitably benefit such groups, or experience successfully advancing racial equity in other ways. This may also include experience soliciting, obtaining, and applying input from such groups when designing, planning, or implementing programs and activities.

VI. AWARD ADMINISTRATION INFORMATION

A. Award Notices

Following the evaluation process, HUD will notify successful applicants of their selection for funding. HUD will also notify other applicants, whose applications were received by the deadline but were not chosen for award. Notifications will be sent by email to the person listed as the AOR in item 21 of the SF-424.

1. Final Grant

After HUD has made selections, HUD will finalize specific terms of the award and budget in consultation with the selected applicant. If HUD and the selected applicant do not finalize the terms and conditions of the award in a timely manner, or the selected applicant fails to provide requested information, an award will not be made to that applicant. In this case, HUD may select another eligible applicant. HUD may also impose specific conditions on an award as provided under [2 CFR 200.208](#).

2. Adjustments to Funding

To ensure the fair distribution of funds and enable the purposes or requirements of a specific program to be met, HUD reserves the right to fund less than the amount requested in an application.

a. HUD may fund no portion of an application that:

- (1) Is ineligible for funding under applicable statutory or regulatory requirements;
- (2) Fails, in whole or in part, to meet the requirements of this notice;
- (3) Duplicates activities funded by other federal awards; or
- (4) Duplicates activities funded in a prior year.

b. HUD may adjust the funding for an application to ensure funding diversity, geographic diversity, and alignment with HUD administrative priorities.

c. If an applicant turns down an award offer, or if HUD and an applicant do not finalize the terms and conditions of the award in a timely manner, HUD may withdraw the award offer and make an offer of funding to another eligible application.

d. If funds remain after all selections have been made, remaining funds may be made available within the current fiscal year for other competitions within the program area, or be held for

future competitions (if allowable in accordance with the applicable appropriation or authorizing statute), or be used as otherwise provided by authorizing statute or appropriation.

e. If, after announcement of awards made under the current NOFO, additional funds become available either through the current appropriations, a supplemental appropriation, other appropriations or recapture of funds, HUD may, in accordance with the appropriation, use the additional funds to provide additional funding to an applicant awarded less than the requested amount of funds to make the full award, and/or to fund additional applicants that were eligible to receive an award but for which there were no funds available.

3. Funding Errors

If HUD commits an error that when corrected would cause selection of an applicant during the funding round of a Program NOFO, HUD may select that applicant for funding, subject to the availability of funds. If funding is not available to award in the current fiscal year, HUD may make an award to this applicant during the next fiscal year, if funding is available.

B. Administrative, National and Departmental Policy Requirements and Terms for HUD Applicants and Recipients of Financial Assistance Awards

Unless otherwise specified, the following [Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards](#) apply. Failure to comply with these requirements may impact your ability to receive or retain a financial assistance award from HUD. Read the requirements carefully as the requirements are different among HUD's programs.

1. Compliance with The Fair Housing Act ([42 U.S.C. 3601-3619](#)) and implementing regulations at [24 CFR part 100 et seq](#)
2. Compliance with Title VI of the Civil Rights Act of 1964, [42 U.S.C. 2000d-2000d-4](#) (Nondiscrimination in Federally Assisted Programs) and implementing regulations at [24 CFR part 1](#)
3. Compliance with the Age Discrimination Act of 1975 ([42 U.S.C. 6101-6107](#)) and implementing regulations at [24 CFR part 146](#)
4. Compliance with Section 504 of the Rehabilitation Act of 1973 ([29 U.S.C. 794](#)) and implementing regulations at [24 CFR part 8](#)
5. Compliance with the Americans with Disabilities Act, [42 U.S.C. 12101 et seq](#)
6. Compliance with Affirmatively Furthering Fair Housing (AFFH) requirements, including those listed on HUD's [Affirmatively Furthering Fair Housing](#) webpage
7. Compliance with Economic Opportunities for Low-and Very Low-income Persons (Section 3) requirements, including those listed at [24 CFR part 75](#)
8. Compliance with Improving Access to Services for Persons with Limited English Proficiency (LEP) requirements, including those listed within [Federal Register Notice, FR-4878-N-02](#) (also see [HUD's webpage](#))
9. Compliance with Accessible Technology requirements, including those listed on in [HUD's Policy on Section 508 of the Rehabilitation Act and Accessible Technology](#)
10. Compliance with Equal Access Requirements (see [24 CFR 5.105\(a\)\(2\)](#) and [5.106](#))
11. Compliance with Ensuring the Participation of Small Disadvantaged Business, and Women-Owned Business requirements at [2 CFR 200.321](#)
12. Compliance with Energy Efficient, Sustainable, Accessible, and Free from Discrimination by Design

13. Compliance with Real Estate Acquisition and Relocation requirements (see [49 CFR part 24](#) and applicable program regulations)
14. Compliance with Participation in HUD-Sponsored Program Evaluation (see [Federal Register Notice, FR-6278-N-01](#))
15. Compliance with OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (see [2 CFR part 200](#))
16. Compliance with Drug-Free Workplace requirements (see [2 CFR part 2429](#), which is HUD's implementation of [41 U.S.C. 701, et seq.](#))
17. Compliance with the requirements related to safeguarding resident/client files
18. Compliance with the Federal Funding Accountability and Transparency Act of 2006 ([2 CFR part 170](#)) (FFATA), as amended
19. Compliance with Eminent Domain
20. Compliance with Accessibility for Persons with Disabilities requirements on [HUD's Disability Overview](#) webpage
21. Compliance with Violence Against Women Act at [24 CFR part 5](#), subpart L and applicable program regulations
22. Compliance with Conducting Business in Accordance with Ethical Standards/Code of Conduct, including [2 CFR 200.317](#), [2 CFR 200.318\(c\)](#) and other applicable conflicts of interest requirements
23. Compliance with the [Build America, Buy America \(BABA\) Act](#) procurement requirements and [implementing guidance available on HUD's dedicated webpage](#)
24. Compliance with System for Award Management and Universal Identifier Requirements at [2 CFR part 25](#)
25. Compliance with [section 106\(g\) of the Trafficking Victims Protection Act of 2000 \(TVPA\), as amended \(22 USC 7104\(g\)\)](#) and implementing regulations at [2 CFR part 175](#) (Award Term for Trafficking in Persons)
26. Compliance with Award Term and Condition for Recipient Integrity and Performance Matters (see [Appendix XII to 2 CFR part 200](#))
27. Compliance with Suspension and Debarment (see [2 CFR part 2424](#) and [2 CFR part 180](#))
28. Compliance with environmental justice requirements under Executive Orders [12898](#) and [14008](#), and OMB Memorandum [M-21-28](#), which implements the Justice40 Initiative, section 223 of Executive Order [14008](#).
29. Compliance with Eliminating Barriers That May Unnecessarily Prevent Individuals with Criminal Histories from Participation in HUD Programs (see [HUD Secretary Fudge's April 12, 2022 memorandum](#))
30. Compliance with equity requirements, which include compliance with racial equity and underserved communities and LGBTQ+ requirements under Executive Orders [13985](#) and [13988](#)

Compliance with 41 U.S.C. § 4712, which includes informing your employees in writing of their rights and remedies, in the predominant native language of the workforce. Under 41 U.S.C. § 4712, employees of a contractor, subcontractor, grantee, subgrantee, and personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related

to a Federal contract (including the competition for or negotiation of a contract) or grant. (See [Federal Contractor or Grantee Protections | Office of Inspector General, Department of Housing and Urban Development \(hudoig.gov\)](#))

Environmental Review

In accordance with 24 CFR 50.19(b)(3) and (b)(9), activities funded under this NOFO are exempt or categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321) and not subject to environmental review under related laws and authorities.

Prohibition on Surveillance

Compliance with [2 CFR 200.216, Prohibition on Certain Telecommunication and Video Surveillance Services or Equipment](#) is required.

This is regarding certain telecommunication services or equipment being sought or used for telephonic, virtual, online registration or training provided to counselors under this award.

HUD also reserves the right to terminate this award, in whole or in part, under the conditions specified within 2 CFR 200.340(a).

Remedies for Noncompliance

HUD may terminate a Federal award, in whole or in part, for any of the reasons specified in [2 CFR 200.340, Termination](#).

Lead-Based Paint Requirements

When providing education or counseling on buying or renting housing that may include pre-1978 housing under your grant you must inform clients of their rights under the Lead Disclosure Rule ([24 CFR part 35, subpart A](#)), and, if the focus of the education or counseling is on rental or purchase of HUD-assisted pre-1978 housing, the Lead Safe Housing Rule (subparts B, R, and, as applicable, F - M).

C. Reporting

HUD requires recipients to submit performance and financial reports under OMB guidance and program instructions.

1. Recipient Integrity and Performance Matters

You should be aware that if the total Federal share of your federal award includes more than \$500,000 over the period of performance, the award will be subject to post award reporting requirements reflected in [Appendix XII to 2 CFR part 200, Award Terms and Conditions for Recipient Integrity and Performance Matters](#).

2. Race, Ethnicity and Other Data Reporting

HUD requires recipients that provide HUD-funded program benefits to individuals or families to report data on the race, color, religion, sex, national origin, age, disability, and family characteristics of persons and households who are applicants for, participants in, or beneficiaries or potential beneficiaries of HUD programs in order to carry out the Department's responsibilities under the Fair Housing Act, Executive Order 11063, Title VI of the Civil Rights

Act of 1964, and Section 562 of the Housing and Community Development Act of 1987. These authorities prohibit discrimination in housing and in programs receiving financial assistance from the Department and direct the Secretary to administer the Department's programs and activities in a manner affirmatively to further these policies and to collect certain data to assess the extent of compliance with these policies. Each recipient shall keep such records and submit to the Department timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Department may determine to be necessary to enable it to ascertain whether the recipient has complied or is complying with 24 CFR parts 1 and 121. In general, recipients should have available for the Department data showing the demographics of beneficiaries of federally-assisted programs.

3. Compliance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 109-282) as amended (FFATA)

FFATA requires information on federal awards be made available to the public via a single, searchable website, which is www.USASpending.gov. Accordingly, each award HUD makes under this NOFO will be subject to the requirements provided by the Award Term in Appendix A to [2 CFR part 170](#), "REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION," unless the Federal funding for the award (including funding that may be added through amendments) is not expected to equal or exceed \$30,000. Requirements under this Award Term include filing subaward information in the Federal Funding Accountability and Transparency Act (FFATA) Sub-award Reporting System (FSRS.gov) by the end of the month following the month in which the recipient awards any sub-grant equal to or greater than \$30,000.

4. Program-Specific Reporting Requirements

Award recipients will be required to submit monthly and quarterly progress reports, comparing actual accomplishments with the goals and objectives established for the period, explaining why established goals were not met, and highlighting any problems, delays, or adverse conditions that materially impaired the ability to meet the objectives of the awards. Each recipient is also required to report accomplishments against proposed outputs and outcomes as part of their quarterly reporting requirement to HUD. Recipients shall use quantifiable data to measure performance against goals and objectives outlined in their application, or as subsequently revised.

D. Debriefing

For a period of at least 120 calendar days, beginning 30 calendar days after the public announcement of awards under this NOFO, HUD will provide a debriefing related to their application to requesting applicants. A request for debriefing must be made in writing or by email by the AOR whose signature appears on the SF-424 or by his or her successor in office and be submitted to the POC in Section VII Agency Contact(s) of this NOFO. Information provided during a debriefing may include the final score the applicant received for each rating factor, final evaluator comments for each rating factor, and the final assessment indicating the basis upon which funding was approved or denied.

VII. AGENCY CONTACT(S)

HUD staff will be available to provide clarification on the content of this NOFO.

Questions regarding specific program requirements for this NOFO should be directed to the POC listed below.

Name:

Virginia F. Holman

Phone:

540-894-7790

Email:

virginia.f.holman@hud.gov

Individuals who are deaf or hard of hearing, or who have speech and other communication disabilities may use a relay service to reach the agency contact. To learn more about how to make an accessible telephone call, visit the webpage for the [Federal Communications Commission](#). Note that HUD staff cannot assist applicants in preparing their applications.

VIII. OTHER INFORMATION

1. Compliance of this NOFO with the National Environmental Policy Act (NEPA)

This NOFO does not direct, provide for assistance or loan and mortgage insurance for, or otherwise govern or regulate, real property acquisition, disposition, leasing (other than tenant-based rental assistance), rehabilitation, demolition, or new construction, or establish revise or provide for standards for construction or construction materials, manufactured housing, or occupancy. Accordingly, under [24 CFR 50.19\(c\)\(1\)](#), this NOFO is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321).

2. Web Resources.

- [Affirmatively Furthering Fair Housing](#)
- [Assistance Listing \(formerly CFDA\)](#)
- [Climate Action Plan](#)
- [Climate and Economic Justice Screening Tool \(CEJST\)](#)
- [Code of Conduct Requirements and E-Library](#)
- [Environmental Review](#)
- [Equal Participation of Faith-Based Organizations](#)
- [Fair Housing Rights and Obligations](#)
- [Federal Awardee Performance and Integrity Information System](#)
- [Federal Funding Accountability and Transparency Act \(FFATA\) Subaward Reporting System](#)
- [Grants.gov](#)
- [Healthy Homes Strategic Plan](#)
- [Healthy Housing Reference Manual](#)
- [Historically Black Colleges and Universities \(HBCUs\)](#)
- [HUD's Strategic Plan](#)
- [HUD Grants](#)

- [HUD Reform Act](#)
- [HUD Reform Act: HUD Implementing Regulations](#)
- [Limited English Proficiency \(LEP\)](#)
- [NOFO Webcasts](#)
- [Procurement of Recovered Materials](#)
- [Promise Zones](#)
- [Section 3 Business Registry](#)
- [State Point of Contact List](#)
- [System for Award Management \(SAM\)](#)
- [Real Estate Acquisition and Relocation](#)
- [Unique Entity Identifier](#)
- [USA Spending](#)

3. Program Relevant Web Resources

<https://www.hudexchange.info/programs/housing-counseling/>

APPENDIX