

**FY23/FY24 PRICE NOFO Modifications and Public Participation Essentials Transcript
May 22, 2024**

[Speaker 4]

Welcome everyone to the Preservation and Reinvestment Initiative for Community Enhancement Notice of Funding Opportunity, otherwise known as the PRICE NOFO, webinar. My name is Jennifer Day, I'm from the Special Issues Team in the Office of Block Grant Assistance, and I will be your emcee for today's webinar. This is the 8th in a series of webinars covering HUD's PRICE NOFO.

These webinars are intended for potential PRICE applicants and provide participants with an overview of PRICE and the application requirements. Today's webinar will provide a look at the modification of the PRICE NOFO and public participation essentials. As many of you are aware, HUD published a modification of the PRICE NOFO on May 17th, 2024.

The presentation today will provide an overview of the changes for the NOFO. In addition to the presentation, the FAQs have been updated to reflect the contents of the modified NOFO. While this presentation will provide you with the key changes to the NOFO, please review the modified NOFO carefully. It is the definitive source for information on the PRICE competition.

In addition to the NOFO modification, we will also touch on public participation essentials. As I mentioned, today's agenda includes a couple of reminders about where to find resources, followed by the presentation.

We will leave time at the end for Q&A. I will cover a few general housekeeping rules. All participants will be muted, so we ask that you submit all questions using the chat feature so that our presenters may be able to see questions and respond.

Please send your chat to all panelists to ensure that we are receiving questions throughout the event. Webinar materials will be posted to the PRICE page on hud.gov. Materials will be posted as soon as they are made 508 compliant. We have updated the site to include past webinar recordings and updated FAQs, so please take a look.

Next slide. As you can see, the PRICE NOFO landing page has been updated with information on the modification. You can also find updated FAQs on this page.

Please continue to check the landing page regularly for updated resources. Next slide. As we get closer to submission, we also want to remind folks that materials, instructions, and the application package are available through grants.gov. HUD does not manage grants.gov, so if you come across any challenges logging in or finding materials, please reach out to grants.gov directly. As you can see, there is some contact information on the slide. You will also find the modified NOFO on the grants.gov page. We'll take a closer look at that in the presentation.

Next slide. This webinar is the 8th in a series of webinars for PRICE. We are planning to host additional webinars in June and we'll keep you updated via our listserv and the PRICE NOFO web page.

Please keep your eyes out for information on those upcoming webinars. If you have questions after today's webinar, please send them to PRICE at hud.gov and we will try to address them in future webinars. Next slide.

Now that we've discussed PRICE resources in the webinar series, I will hand it over to Robert Peterson, Director of the State and Small Cities Division in the Office of Block Grant Assistance within the Office of Community Planning and Development to provide you with information on the modified NOFO. Welcome, Director Peterson.

[Speaker 1]

Thank you, Jennifer. Always a wonderful introduction. Thank you very much.

Go ahead and jump right into this. I'm sure you're anxious to hear about what we've changed, but I do believe that, generally speaking, this won't affect most proposals. I do think that our changes and clarifications that we're providing are relatively simple and straightforward.

And like I said, I don't anticipate that they will impact the majority of the proposals, but if they do, we'll discuss that as well. So, I'll hop right into the modifications. You can find the modified NOFO on grants.gov. There are the zip files there that you can see and you just clicked on the one that says revised. You can't make a mistake because the old one is now empty. So, no worries. You're not going to click on the wrong one.

The old one has been removed. So, what did we modify? Just generally speaking, we received 10 million dollars more in FY 24.

So, we've combined that with what we received in FY 23 rather than running a new competition for a relatively small amount of money. We've added those funds together onto a single competition. And we've also addressed questions that we've been receiving in our mailbox PRICE at HUD.gov. Lots of similar questions. So, we saw an opportunity to make some clarifications in the NOFO and we took advantage of that. Biggest thing, as I mentioned, is that we've combined funding from 2 fiscal year allocations from Congress. We received an extra 10 million dollars, which was added to the PRICE Main competition.

And it includes 1 million dollars specifically reserved for Tribal Applicants. And if you look at this table, you can see what was the funding amounts prior and under the modified NOFO. So, the total amount of funding has increased to \$235 million and \$10 million of that is under PRICE Main.

So, it's \$210 million on top of PRICE Main. 11 million is now intended for Tribal Applicants. So, a small increase to that.

And the Replacement Pilot remains the same at \$25 million. The minimum and maximum funding amount requests have not changed for the applications. Those remain the same.

So, in terms of your individual applications, while there are more funds available overall, your individual application amounts would not necessarily need to change. The submission deadline, and this is probably everyone's favorite change, the submission deadline has been

extended to July 10th. That does give everyone more time, given that we've provided these modifications.

If you need more time, we've provided that. The way this works, if you've already submitted an application, you read through the modified NOFO and you decide that you want to change something in the application that you've submitted, you are able to do that. What you do is you just resubmit the entire application with all the attachments and forms and everything.

Resubmit the whole package. We will only look at the latest one that's been submitted as long as it was submitted on time. Okay.

So, that's how you can resubmit. You may also want to take advantage of the increased page limit. That does apply to all applications.

So, we've increased the page limit from 40 to 45 pages. And there's a specific reason why we did that, which I'll cover in just a second. Number of applications, this has not changed.

You can only submit one application. What has changed and been clarified is that you may specify whether you're applying to PRICE Main, PRICE Replacement Pilot, or whether you're applying to both categories of funding. With a single application, you may now clearly apply to PRICE Main and the PRICE Replacement Pilot.

An eligible applicant that's applying directly can also apply separately, though, under a partnership application. So, there are some caveats to the one application requirement, just to keep those in mind. And all these can be found in Section III.D.4 if you need additional details.

And more importantly, no community or project can be assisted by more than one PRICE grant. Now, the change that I mentioned, this is the reason why we increased the page limit from 40 to 45 pages, to give more room to folks, especially those that want to apply to both PRICE Main and the PRICE Replacement Pilot. So, the way this works is when you apply to both, under the Replacement Pilot, you would have to provide a match exceeding 50 percent of the request.

If you're applying to both, you're going to be also providing that match for the 50 percent, exceeding 50 percent of what you're requesting for the Pilot. You will not be scored on leverage. Leverage is only if you're applying to just PRICE Main.

If you're applying to both the Pilot and PRICE Main, you have to address all the applicable prompts in the review criteria. You do have to provide separate budgets and we'll review that and evaluate that in order to score your applications. Just a reminder, HUD has separate and distinct evaluation criteria for PRICE Main and the PRICE Replacement Pilot.

More pages are provided if you're applying to both. More pages are provided to everyone, but if you're applying to both, you do need to address the evaluation criteria for both Main and Pilot. And more details are provided in Section V.A.1.d and Attachment F.

Eligible applicants. This hasn't changed, but we have provided some clarity about the eligible applicants. We received a lot of questions about the last bullet on this list that came out of

the statute regarding other entities that partner with one or several residents of such eligible communities or that propose to implement a grant program.

So we've taken this opportunity in the NOFO to help explain what that means and who that covers. Otherwise, the list is the same list, states, counties, cities, Native American tribal organizations, federally or not federally recognized, multi-jurisdictional entities, MPOs, resident-controlled Manufactured Housing Communities, cooperatives, non-profit entities, CDFIs, and Tribal Applicants. It's all remained the same and we've provided clarity around the other entities that may also apply based on the type of proposal that they're submitting.

So regarding those other entities, one of the criteria was if you were partnering with one or more residents in the community and what that would mean. To do that, partners may demonstrate a partnership or evidence of collaboration between the parties by attaching relevant documentation to the application, such as legally binding development or cooperative agreements. This does include CDBG joint agreements between an urban county and a metropolitan city.

HOME Consortia agreements are all examples of that. Now, these other entities that could apply based on partnerships or based on implementing a grant program, that would cover for-profits. We've made that clear.

It wasn't as clear in the prior version of the NOFO. It is now made clear. But HUD does retain, the Secretary retains the authority to deem those entities eligible where we determine that PRICE objectives are being met and where we determine that there's broad and inclusive stakeholder engagement with Manufactured Housing Communities and their residents.

All applicants, including for-profits, are subject to the PRICE-specific program requirements related to affordability, as described in this NOFO.

[Speaker 5]

You can see Section III.A for additional details on that.

[Speaker 1]

To be eligible under the other entity category relating to implementing a grant program, what we're talking about here is applicants who partner with Manufactured Housing Communities or propose to implement a program assisting residents of eligible Manufactured Housing Communities and carry out a grant award program by means of subawards to subrecipients to carry out PRICE activity. Such applicants must provide evidence of collaboration between the parties, this means attaching as part of the application relevant and supporting documentation, such as legally binding development or cooperation agreements. Regarding partnerships, letters of intent, if an application wishes, or excuse me, if an applicant wishes to engage in a partnership, all partners must submit a letter of intent to participate in the proposed project.

The letters or letter of intent to participate in a binding agreement must be included in the application. TDHEs and tribal organizations applying on behalf of Indian tribes do not need to provide this documentation because they're applying on behalf of the Indian tribe already.

[Speaker 5]

It's not considered a partnership in that regard. Eligible activities.

[Speaker 1]

This is out of some minor clarifications. What you see here has not changed. Under PRICE Main, you still have to be preserving and revitalizing manufactured housing and eligible Manufactured Housing Communities.

Under the PRICE Replacement Pilot, still the same, it's talking about redevelopment of Manufactured Housing Communities as affordable replacement housing. All the proposed activities must be eligible CDBG activities as modified by this NOFO, so there's some caveats and some waivers to the CDBG base that we've implemented for the purpose of the PRICE program. All the activities still have to be eligible.

There is an opportunity as well to request a waiver if necessary, and details on that are included in the NOFO. You can look at section III.F.2 for additional details. The part that we've clarified is with regards to new construction.

So, new construction with PRICE awards, you can use PRICE awards for acquisition and purchase of manufactured housing, as well as installation and new construction of housing. And when I say new construction, it's distinct from reconstruction in that dwelling units are being added by new construction. Other forms of residential new construction, specifically non-manufactured housing, so we're talking about stick built or modular, those types of non-manufactured housing construction are only allowed under the PRICE Replacement Pilot and limited to up to four dwelling units for each unit replaced.

New construction activities are subject to the same requirements that apply to rehabilitation activity. The acquisition and installation of manufactured housing units is not limited to four units for each replaced.

[Speaker 5]

And again, section III.F.2 has more details about it.

[Speaker 1]

We've also provided some clarifications to the program definitions regarding change of use, cooperatives, resident controlled Manufactured Housing Communities, resilience activities, and we've added definitions for leverage and match. These definitions do not change the requirements for leverage and match. They just provide additional clarity on what was meant when I say leverage and match.

So, what do we mean? So, for leverage, this is under the Main program. You can get points for leverage.

Basically, this is a federal or non-federal elective contribution. It can be financial or non-financial, but it has to be firmly committed to address the activities described in the application. For match, leverage is not applicable for the PRICE Replacement Pilot.

So, for Main, applications can get points based on the total amount of other resources and funding that the applicant is leveraging. Now, for match, this is applicable to the

Replacement Pilot only or if you're applying for both pots of funding. If you're applying to both PRICE Main and PRICE Replacement Pilot, excuse me, you're applying to both or if you're just individually applying to PRICE Replacement Pilot, you're going to be scored on match.

And match is a required non-federal financial contribution exceeding 50 percent of the amount you request for your PRICE Replacement Pilot activities. And again, this is not applicable to Main. Under Main, you're being judged on leverage.

Under the Replacement Pilot or if you apply to both, you're being judged on match.

[Speaker 5]

And Section III.C, Section V.A.1.b have more details on.

[Speaker 1]

The affordability requirements, we've provided clarity around the affordability requirements. This has not really changed, but we have clarified. And again, we've provided an alternative requirement.

This basically means we've changed something. If you're familiar with the CDBG program, this program is based on that. So, when we say we provide an alternative requirement, that means we've just changed something that is established for CDBG and made it applicable to this.

So, the requirement that's established for PRICE is an affordability period of not less than 15 years. In the PRICE action plan for all housing activities, a grantee must define affordable rents and the affordability standards and enforcement mechanisms that will be applied to affordable rental housing. Also, in the PRICE action plan for all non-housing activities.

So, in this case, we're talking about public improvements, water, sewer, that type of thing. A grantee must demonstrate how its agreements will attach affordability requirements to the assisted activity. This is an extension of affordability for those types of activities.

We received a lot of questions about this in the PRICE mailbox, and we've modified the NOFO to make that clear, that it does still apply to those types of activities. How you enforce it is required to be shown in your application.

[Speaker 5]

Environmental review, just provided some clarity here.

[Speaker 1]

We received questions about this. Environmental reviews are also applicable to projects undertaken by non-government entities. Non-governmental entities must coordinate with their local HUD field office to arrange for the environmental review pursuant to part 24 CFR part 50.

[Speaker 5]

The NOFO section VI.B has more details. Indirect cost rate.

[Speaker 1]

There's a small little update here. If you're familiar with OMB, Office of Management and Budget, they have the administrative requirements. The recent update to that, that's going into effect October 1st.

But as an agency, we can implement that. Prior to that date, it is in effect. So, basically, it's just going from 10 percent of your modified total direct costs to 15 percent of your total, excuse me, of your, of your model total direct costs when determining, I think it's the default indirect cost rate.

So, just a minor update there related to some updates to the uniform administrative requirements.

[Speaker 5]
Public participation.

[Speaker 1]
We've provided some clarity here in terms of what has to be published for public comment. So, when you publish your application for public comment, you have to include your table of contents, all your narrative exhibits, but not necessarily all the attachments. The attachments that you do not have to publish for public comment include Attachment F, Match or Leverage Documentation, Attachment G, Certifications and Standard Forms, and Attachment H, which is a summary of comments received on the published application and list of commenters by name and organization.

So, this is intended to allow you to put your application out for public comment while some of these things are still being developed. So, again, you have to publish your entire application for public comment except for attachments F, G, and H. H is the most obvious one.

You're not going to have, you're not going to have a response to public comments before you've even published it for public comment. So, a little bit of circular logic there that we've clarified that that does not need to be included in the document for public comment. Applicants are responsible for ensuring that all members of their community have equal access to information about their programs, and applicants are required to accept public comments either in person, by mail, and electronically.

Public participation requirements regarding the public hearing. We received a lot of questions about the public hearing, especially related to non-governmental entities who may be less familiar with holding a public hearing. It's not typically something you would do if you're a nonprofit, for example.

So, this is clarified. It is a requirement, at least one in-person public hearing for the application, and you have to provide reasonable notice of that hearing, which is at least 15 calendar days prior. You have to provide an opportunity for public comment and ongoing public access to the information about the use of grant funds.

And just to clarify, the public hearing can be what you might consider a community meeting, as long as it fulfills the same requirements that are applicable to public hearings. So again, all applicants, whether you're a nonprofit or a manufactured housing community or

otherwise, are all still required to hold a public hearing or a community meeting that meets these requirements. Public hearings or community meetings must be held in-person at times and locations convenient to potential beneficiaries and with accommodation for persons with disabilities.

You can do a hybrid meeting, which is a meeting that allows for both in-person and virtual attendance, provided that you use an online platform that facilitates public access to all questions and responses. Applicant would respond to public comments and submit its application, including that attachment page that I mentioned. You're going to address your public comments, summary of those comments, why they were accepted or not accepted, and also list of commenters by name and organization.

The public comment period has to end at least three days before the application is submitted.

[Speaker 5]

That shows us that you've taken into consideration those comments.

[Speaker 1]

Tribal Applicants have the option of following the streamlined public participation requirements outlined in the paragraph or following the requirements outlined in the ICDBG regulation. It's their choice and that's in Section VI.E.5.a.iii. Some other minor clarifications in terms of annual performance reports and what it means to have a procedure for addressing complaints.

You know, clarified timely expenditure funds has been clarified. Generally, this is because we added two fiscal years of funding to this program. Program Income is clarified to apply to all PRICE recipients.

Duration of funding has been clarified as well. Again, this is related to the fact that we have two fiscal years of funding. Now I'm going to pass it to Jon who's going to go over public participation essentials.

And these will be general guidelines about public participation, not necessarily specific NOFO requirements, but just general best practices regarding public participation.

[Speaker 5]

Jon? Thank you, Robert.

[Speaker 2]

And I just want to welcome everybody to the PRICE session on public participation essentials. Next, please. All right.

So, as Robert said, my name is Jon Kunz and I'm a Senior Technical Assistance Advisor with the CloudBurst Group. I'm really happy to be here with you today to talk about public participation. Next.

As we begin, let me first just note that public participation is a hallmark of the community development block grant program. So, the CDBG program was designed to address local needs identified by local community members. Please keep in mind, please really keep this

in mind as you think about ways to fully incorporate public participation into your proposal development process.

So, today's session, we're going to focus on three main topics. First, what are the desired goals and elements of public participation process for your programs? Second, what are the critical elements of a streamlined public participation process?

And third, what are some of the best practices to improve access and engagement in your process? Next, please. It's helpful to think about the overall goals of the public participation process.

One goal is to give residents, public agencies, and other interested parties the opportunity to advise the planning, implementation, and assessment of CDBG programs and projects. Another goal is to seek out meaningful input from those low and moderate income members of your community who will be affected or seek to participate in the CDBG programs. So, again, public participation is a fundamental element of the CDBG program.

Next, please. Beyond being a requirement, public participation has many real benefits for your project or your program. One is that it will help you make critical decisions about how to operate and implement your program.

A second is that it creates accountability with the people and communities you're trying to serve. And the third benefit is that it increases transparency for community members and others about the use of government funds. Our point is that a robust public participation process results in an approved plan for those precious public dollars.

Next, please. We have broken down the public participation process into six basic steps. First, you want to develop your overall public participation strategy, and we'll talk about those in the next few slides.

Other steps that we'll go over in the process include notifying the public, making your plan available for review, holding a public comment period, holding your public meeting, and then documenting and incorporating your comments into the proposal or plan. So note, please, just in our model process here, the public meeting can be held anytime during the public comment period. Next.

You may find it useful to ask yourself some overarching questions as you start developing your public participation strategy. Who are the stakeholders for your particular plan or set of activities? What is the best way to reach stakeholders to inform them of what you're planning to do?

And how do you ensure that people can easily access the plan and provide comments? Next, please. Defining the scope of public participation process can be broken down into a few components.

So first, think about your goals. What information are you trying to share and with whom? Think about the geographic boundary of your project or plan.

Is it similar? Or rather, is it a small defined area? Does it cover multiple jurisdictions?

Or does it even cover an entire state or even multiple states? Think about who are the stakeholders. Are these residents of a particular development or communities that will be directly or indirectly affected by your activities?

Or maybe these residents are part of a broader group of people who just need to be informed about your activities. And then it's also developed. Really, it's pretty important to develop your timeline.

When does the process need to start and end in order to meet the program requirements? Next, please. Okay, so next, we're just going to talk about notifying the public and making your plan available for review.

Next. For your public notice, you need to reach people who just based on your goals and are impacted by the plan. So think about how to incorporate equity and access for all.

You also want to provide sufficient notice to allow time for comment. And then you want to make sure you're using relevant communication tools to reach the stakeholders and provide essential information in your notice. Next, please.

All right, so what should you include in your notice? In a nutshell, your public lays out your process for the public and how they can comment. You'll want to provide enough information so people can understand how this relates to them.

Generally, you should include a short summary of the proposal and contact information for who they can talk to if they do have questions. You should also include basic information about the public hearing, such as the date, time and location. Include information about accessibility and who to contact if someone needs a reasonable accommodation to enable their participation.

The notice should also contain information about the written comment period, particularly the start date and the end date for when comments will be accepted, as well as instructions on how to provide written comments. Next, please. You have a range of communication tools through which you can share your public notice.

You can use electronic means, such as posting the notice on your website, emailing it to interested parties, or sharing announcements through social media. You can also go to low-tech route using low-tech approaches or tools. These may include direct mail announcements through your local TV or radio, placing an advertisement in your local newspaper, or even putting flyers up in the neighborhood.

The last category to consider is engaging a network of organizations that serve the target audiences. Often, these organizations have relationships to help community members connect with the information you're providing. Next, please.

So, now that you've sent out the notice, it's time to make the plan available to the public. You need to provide access to the complete plan, such as posting it on a website for review. You can also make physical copies available in accessible locations, typically such as the library.

Providing a short summary of the cover page is helpful. Making the document accessible to e-readers is also an important practice. Next.

[Speaker 5]
All right.

[Speaker 2]
Next, let's talk about holding a public written comment period and your public meeting. Next, please. The written comment period needs to have a clear start and an end date.

We would suggest adding a couple of extra days to the comment period to make sure you've met the minimum time and also to add on, as Robert indicated, often it's good to add on extra time to make sure you can incorporate questions or comments. Don't forget to establish a mechanism for the public to provide comments along with their comments about the proposal and plan. You'll want to collect their name and contact information.

And many communities use an online form to make it easy for people to provide comments. It's also helpful to explain how you use and respond to comments.

[Speaker 5]
Next.

[Speaker 2]
There are a few basic elements to remember for your public meeting. Making the entire plan available prior to the public meeting will give people a chance to review it before they actually go and make the comments. You'll want to hold your public meeting in an accessible location at a time when people can participate.

Make sure to have participants sign-in sheets available to capture who has participated in your meeting. You'll want to have a note taker to record or report comments or at least a way to record audience comments. And finally, you will want to collect and document these comments for your proposal or plan.

Next. There are several other elements that help public meetings go smoothly. For example, follow an agenda and establish ground rules to help create a respectful environment where people can share their perspectives.

Consider whether you want to stream and or record the meeting. It's also helpful if you have print, if you print a summary of the plan or proposal under discussion. And lastly, think about how you will ensure accessibility for the people who are directly affected or impacted by this activity.

Next. So, here are a few more notes about expanding access to the plan and public meeting space. So, for instance, think about how people will get to the meeting.

Is there an accessible entrance and bathroom? Is the space familiar and comfortable to the people who are trying to reach? You may also want to have an ASL interpretation or some language translation services if there's a high concentration of non-English speakers.

It's always helpful to have materials in large print and accessible to screen readers. Some communities also provide child care, and as we talked about earlier, it's important to provide reasonable accommodations upon request. Next.

Finally, let's talk about documenting and incorporating public comments. Next. Next, please.

So, having achieved your goal of hearing from the community, we're going to talk a little bit about some best practices for integrating the public comments into your plan. Make sure to document and summarize both written comments received and verbal statements made during the public meeting. Acknowledge the comments received, even if you do not change your plans based on them.

Sincerely consider how you may adjust the proposal to address concerns or suggestions raised. And finally, communicate how you are changing the proposal in response to the public comments. Next.

So, we've covered a lot in a short time, so please see the HUD exchange for more public participation resources. There are links here for three tools that you might find helpful as you consider how to structure your public participation process. Thanks for listening, and I'll turn you over to Jennifer.

[Speaker 4]

Thank you, John. Now we're going to go ahead and transition to the Q&A portion of the webinar, and that will be with our OBG team and Cloudburst standing by. Just a reminder to everyone that HUD competitions are governed by the HUD Reform Act, so the NOFO is the definitive for all answers.

We cannot interpret, but we can tell you whether something is in the NOFO or the CDBG framework. We'll answer the questions that we can. Please tune in to subsequent webinars and also check back to updates to the FAQs on the PRICE landing page.

We'll take the questions that we received today and look at those and try to come up with broader questions and answers to populate the FAQs. And with that, we will move on to our first question. So, I'm going to go ahead and Jeremiah, the first question is that you mentioned that the information has been updated on the website.

I don't see April 18th webinar materials. Will those be posted?

[Speaker 3]

Yes, they will be posted as soon as they are checked for 508 compliance or accessibility compliance. As soon as that process is done, that webinar and the associated materials will be published on HUD's PRICE page.

[Speaker 4]

Great, thank you. The next question, also for Jeremiah, is the floor for this opportunity \$500,000 or \$5 million?

[Speaker 3]

So, the floor for PRICE Maine is \$500,000 for Tribal Applicants and \$5 million for everyone else. And incidentally, the maximum rewards are the same for all applicants. That applies to

PRICE Maine. For PRICE Replacement Pilot, I would note that the minimums and maximums are the same for all applicants.

[Speaker 4]

Great, thank you. So, here we've got a question about exhibits. Are the exhibits and associated cover sheets included in the page limit?

[Speaker 3]

So, bottom line is each PRICE application should contain no more than 45 pages of narrative exhibits. And just as a reminder, we did increase the page limit from 40 to 45 pages. And the attachments and things listed in Section IV.B.1.c of the NOFO don't count towards the application page limit.

But also note that any pages beyond that limit won't be reviewed. But you'll see a list of items in Section IV.B.1 of things that we're not going to include in the page limit. And I believe that covers things like blank pages or cover sheets and things of that nature.

[Speaker 4]

Great, thank you. Our next question is about the opportunity number. So, what is the opportunity number on grants.gov for the PRICE Pilot?

[Speaker 3]

So, the grant opportunity number, I believe, is the same for both PRICE Maine and the PRICE Replacement Pilot. And that number is FR, like Frank Ralph, dash 6700, dash N, like Nancy, dash 99. I'll read that one more time.

That's FR, dash 6700, dash N, dash 99.

[Speaker 4]

Great, thank you. Okay, our next question. Does HUD have an example or templates for waivers in addition to the guidance provided in the NOFO?

[Speaker 3]

Yeah, so while we don't have waiver examples or templates, you can review Appendix A of the PRICE NOFO for specific waiver requirements. And just note that when requesting a waiver, your goal is going to be to properly justify the need for the waiver and provide a good cause.

[Speaker 4]

Great, thank you. Okay, so here we've got an eligibility question. So, this is very specific, but I think we can answer this one.

It says, the applicant is an investment firm, for-profit, that would like to apply for multiple MHC sites, but the MHCs are investor-owned. I wanted to verify if the investment firm is eligible to apply. They own the site, so we aren't sure if they can be considered a partner.

[Speaker 3]

Okay, yeah, so this is going to give you kind of a long answer. I'm going to pull a few, you know, a few things from the NOFO, but it has been, you know, a popular question has been generally, are for-profit entities eligible for PRICE? So, eligible applicants include for-profit

entities that partner with one or several residents of such eligible Manufactured Housing Communities, or propose to implement a grant program that would assist residents of eligible Manufactured Housing Communities.

And applicants that propose to do that can implement a program assisting residents of eligible Manufactured Housing Communities. They may implement a grant award by means of sub-awards to sub-recipients to carry out PRICE program activities. But, you know, private sectors should note that they need to provide evidence of collaboration between, you know, other involved parties, and this means attaching as part of the application relevant and supportive document or supporting documentation such as legally binding development or cooperation agreements.

As a final note, and this was added to the modified NOFO, is clarification for for-profit entities. For-profit entities may be deemed eligible where HUD determines PRICE objectives are met, and where HUD determines there is broad and inclusive stakeholder engagement with the Manufactured Housing Communities and their residents. So, you know, bottom line is private sector may apply.

You know, they are generally considered eligible, but they'll definitely want to make sure, again, that they're meeting PRICE objectives and they're demonstrating broad and inclusive stakeholder engagement.

[Speaker 4]

Great. Thank you. So, here we've got a question about submission.

The public needs to see the application in its entirety as part of the public hearing process. So, does uploading a second application have an impact on the first that the public has reviewed?

[Speaker 3]

So, that depends. If you've resubmitted a new application with changes to the proposed beneficiaries or the use of funds, then the requirements applicable to substantial amendments would apply and would inform whether a new public comment period and hearing would be necessary. If your second submission includes only minor changes, then an additional comment period and hearing would likely not be necessary, you know, provided those changes don't constitute a substantial amendment.

[Speaker 4]

Great. Thank you. Jeremiah, so do partners need to be included in the key staff and complete the disclosures?

[Speaker 3]

So, the NOFO requires all applicants to list key staff from their organizations and partner organizations, if applicable, who will be responsible for project leadership, management, and implementation. And we're going to want to know the roles that those people will play or that they'll perform throughout the project's life cycle. So, you'll want to describe how your organization will manage partner organizations, if applicable, to ensure that they're meeting expectations as well, that the expectations applied for a successful project implementation.

[Speaker 4]

Great. Thank you. So, Robert, I'm going to hand this next question to you.

So, this question is about clarifying the term community. Can you please clarify what you mean by community when stating that a project or community cannot be supported under more than one PRICE grant? Does that mean a specific manufactured housing community or a larger geographic community?

[Speaker 1]

That's a good question. You know, we don't really define the term community. I think community definitely has a lot of different, a lot of possible breadth to it, right?

So, really, I think it's best to just kind of understand what the intention of this provision is really referring to. And that is, when we say no community or project may be assisted by more than one PRICE grant, the intent there is to prevent duplicative benefit and to ensure that costs are reasonable. It's not intended to refer to a community at large.

And just for example, there could be an allowable situation where you would have multiple Manufactured Housing Communities within a larger county, to cite the question I was asking about an entire county. So, that wouldn't be considered a community in the context of that provision. We're looking at the project sites, the Manufactured Housing Communities within that larger area.

So, it's not intended to be applied in a blanket fashion to a large geography, no.

[Speaker 4]

Great, thank you. Robert, another question for you. When will awards be announced?

[Speaker 6]

Fall of 2024, generally speaking.

[Speaker 4]

So, I'm going to head back to Jeremiah here. The question is, acquisition of land to construct a new manufactured housing community, is that eligible? Not just the acquisition of the units themselves.

[Speaker 3]

Yes. So, I recommend that you take a good look at section III.F.2 of the Modified NOFO for examples of eligible activities. And while that list of examples is not exhaustive, it does include assisting manufactured housing renters and home site renters seeking to become homeowners with land and site acquisition, including for the purposes of creating resident-controlled manufactured housing.

[Speaker 4]

Great, thank you. Next question for you, Jeremiah. If a local government wishes to utilize a sub-recipient, is this considered a partnership and is a binding agreement required for submission?

[Speaker 3]

Yes. So, applicants who partner with Manufactured Housing Communities or propose to implement a program assisting residents of eligible Manufactured Housing Communities may implement a grant award by means of sub-awards to sub-recipients to carry out PRICE program activities. But note that such applicants must provide evidence of collaboration between parties.

This means attaching as part of the application relevant and supporting documentation such as legally binding development or cooperation agreement.

[Speaker 4]

Great, thank you. Robert, I'm going to hand this one back to you. So, when you say the PRICE Replacement Pilot allows up to 4 to 1 replacement of manufactured housing units, does this only refer to new construction at a 4 to 1 ratio?

Is it a requirement to replace homes at up to 4 to 1 or just an option?

[Speaker 1]

So, with the Replacement Pilot, it's a little different than PRICE Main in that other forms of construction are allowed.

[Speaker 6]

So, the 4 to 1 replacement limitation is designed to limit the replacement units, especially those of other construction types.

[Speaker 1]

And I hope that helps to clarify. I did want to step back just a second to a question that was asked about acquisition of manufactured housing units. And I think there might be a just kind of a little bit of a misunderstanding in the way that the question is asked.

I think I know what they're getting at. And I just wanted to clarify that when we say acquisition of a manufactured housing unit, it's not limited to purchasing a manufactured housing unit that's already in place, an existing manufactured housing unit. Acquisition of manufactured housing units can include the acquisition and installation of new manufactured housing units as well.

I just wanted to clarify that prior question.

[Speaker 4]

Thank you, Robert. Okay, so our next question, this is in regards to the public notice. Where do you want us to publish for public notice?

Does it have to be in the local newspaper or can it be in social media?

[Speaker 5]

Is this for me or Robert? Yes, Jeremiah. Thank you.

Oops, we've jumped down to number two. Yeah, sorry.

[Speaker 3]

So the question is, where do you want us to publish for public notice? Did I hear that correctly?

[Speaker 4]

Yes, that is correct.

[Speaker 3]

Okay. So the public participation requirements may be found, they're in Section VI.E.5.a.iii.3 of the PRICE NOFO. But in summary, before an applicant submits the application for the NOFO or a substantial amendment to the PRICE action plan, the applicant must publish the PRICE application or action plan amendment for public comment.

Now, I do want remind you of the added clarification in the modified NOFO that when you publish for public notice, you do not need to include attachments F,G or H in that. The manner of publication must include prominent posting on the applicant's official website or websites and must afford citizens, affected governments, and other interested parties a reasonable opportunity to examine the plan or the amendments contents, whichever is applicable. The official website should be accessible to all citizens and the topic of PRICE should be clearly navigable by users from the applicant's homepage.

Applicants are also encouraged to notify affected citizens through email, through press releases, statements by public officials, media advertisements, public service announcements, or contacts you may have with organizations located in or serving the target area or neighborhood that you're looking at. Applicants are required to hold at least one public hearing or community meeting to solicit public comments on application submission. And then also one hearing before finalizing any substantial amendments, if that's the case, or if that comes up.

[Speaker 4]

Great, thank you. So I'm going to go ahead and wrap up. We've gotten a lot of questions, so we're going to take these questions and use them to inform our FAQs and our next set of webinars.

Robert, Jeremiah, is there anything else you want to address before we wrap things up?

[Speaker 3]

I just want to say thank you. It's really great to have such a large audience today. Certainly happy you came, and I hope that we've been helpful.

As Jennifer mentioned earlier, you know, certainly feel free to reach out to that PRICEHUD.gov inbox and we'll respond. But just note that we do have to be careful about how we respond because anything that, you know, involves kind of giving advice about a particular part of your application, something that could give you an advantage over someone else, those kinds of questions we cannot answer. So, you know, please don't get frustrated if we reply and cite the HUD Reform Act, but certainly don't let that stop you from asking the questions.

If we can't answer them, we will. So that's it for me. Again, thank you and looking forward to how PRICE shapes up.

Robert, I'll turn it over to you.

[Speaker 1]

Well, thank you. I think, you know, I think it's clear that we've, you know, we've done our best to not only design a program that meets the intent of Congress and will have an impact on Manufactured Housing Communities. And we've also taken into account your concerns and questions that have come into the mailbox with this modified NOFO provided an extension accordingly.

So I just want everybody to know that you are being heard. To Jeremiah's point, you know, sometimes our responses do seem a little dry and there's a reason for that, a very legal reason for that. But we want everyone to know that you are being heard and want to wish everyone luck in preparing your applications.

Thank you very much.

[Speaker 4]

Great. Thank you both. And thank you everyone for joining us.

Thank you, Jon, for going through public participation essentials. And everyone, keep an eye on our website, keep an eye on your email. We'll be sure to keep you posted as we develop additional webinars to address the questions you asked today.

We'll keep updating those FAQs. And with that, we'll go ahead and wrap up. Thank you.