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Title: 091423-848835-HUD-PRO

Speaker 0 00:00:01 Good afternoon and welcome everyone to the PRO Housing or Pathways to removing Obstacles to Housing Notice of Funding Opportunity Webinar number seven. My name's Colin Cross. I'm a community planning and development specialist here at HUD, and I'm going to be moderating today's webinar. Today. We have an office hours session where we tackle some common FAQs that we've received through the webinars and in the PRO Housing inbox. We will also field some questions from the audience. Next slide please. Going to go over a couple of housekeeping items before we get started with the presentation. First, all participants will be muted, so we ask that you please submit your questions using the chat feature, and make sure to send your question to all panelists. That way our presenters will be able to see it and respond. Today's agenda begins with some common FAQs answered by Robert Peterson, Director of the State and Small Cities Division within HUD's, Office of Block Grant Assistance, and Cory Schwartz, Deputy Director of the State and Small Cities Division.

Speaker 0 00:01:03 We will take time at the end of the slideshow to field questions from the audience. However, we will also field some live questions in the middle of our presentation. So if you have your questions ready to go, go ahead and put them in the chat. Don't wait until the end. Again, please submit your questions to all panelists using the chat feature. Next slide please. So, as I mentioned, this is the seventh in a series of weekly webinars covering HUD's PRO Housing NOFO, or Notice of Funding Opportunity. These webinars are intended for prospective PRO Housing applicants, and they provide participants with an overview of PRO Housing and the application requirements. Webinar recordings and links to future webinars are posted on the PRO Housing webpage. So, if you visit the page today, be recording, transcript and slides from those first four webinars are available, and we expect to have webinars five and six posted on the PRO Housing webpage shortly.

Speaker 0 00:01:54 You'll see the previous topics of the first six webinars on the slide here. A quick word about the content of those webinars. So webinars one, two, and four covered the actual language in the NOFO and the FAQ document. Webinar three provided a deep dive on priority geographies and the data behind them, and we want to call special attention to webinars five and six that we just had over the past two weeks. Webinar five covered environmental requirements, resilience and other related considerations in the NOFO, and provided some available resources to help applicants tackle those issues. Webinar six from last week covered the civil rights, fair housing, and equity requirements in the PRO Housing NOFO, and provided a list of similar available resources to help applicants with these topics. The last thing I'll add here is that the PRO Housing FAQ document on the PRO Housing webpage, was updated again earlier this week. We've been updating that regularly with the questions that are coming in. So please take a look at the updated FAQ on the PRO Housing webpage. Next slide please.

Speaker 0 00:03:03 So I do have one more announcement before we move on to the presentation. we are excited to report that the PRO Housing NOFO is officially published on grants.gov. If you go to the PRO Housing webpage, that webpage is updated to reflect the NOFOs publication, and it also includes the grants.gov link to the NOFO. So take a look at the published NOFO and please do be aware of the timing for public participation too. Before submitting to HUD, applicants must publish their PRO Housing application in its entirety for public comment. The streamlined requirements mandate at least one public hearing for the application and require providing reasonable notice of at least 15 days and opportunity for public comment and ongoing public access to information about the use of grant funds. We'll touch on this later too, but for more information, you'll want to visit section roman numeral six.

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Speaker 0 00:03:53 So VI.E.5.a.iii of the NOFO. With that announced, let's move on to the presentation. Next slide, please. So I know the slide says Jessie Hanford Come up there. We will instead be hearing from Robert Peterson, as I mentioned, director of the State and Small Cities Division, and Corey Schwartz, the Deputy Director of the State and Small Cities Division. Robert and Corey will answer certain FAQs that we've been receiving. Robert Corey, welcome. Next slide, please. So Robert, let's start with you. Question number one. has the NOFO officially been published? Is it different at all from the NOFO preview?

Speaker 1 00:04:44 Yes. It has been officially published on grants.gov on September 7th to access the funding opportunity and download and application package. You search for pathways to removing obstacles to housing or PRO Housing. the federal register numbers FR-6700-N-98 on grants.gov. We didn't make changes between the NOFO preview and the final published version, except to add a code for the paperwork reduction hearing. The deadline remains the same October 30th, 2023 at 11:59:59 seconds PM Eastern Daylight time. The PRO Housing webpage is updated to reflect the NOFO publication and includes the grants.gov link Optional templates for partner letters and partnership agreements are also posted on the PRO Housing webpage.

Speaker 0 00:05:54 Great. Thanks, Robert. Next slide please. Question number two for Corey. What are the public participation requirements?

Speaker 2 00:06:03 Thanks, Colin. Before submitting to HUD, you must publish your PRO Housing application in its entirety for public comment. Streamlined requirements mandate at least one public hearing for the application require providing a reasonable notice at least 15 days, an opportunity for public comment and ongoing public access to information about the use of grant funds. Please note that we're now within the 50 day window of the deadline, so plan accordingly to ensure sufficient time for public comment. For more information, please visit section VI.E.5.a.iii of the NOFO

Speaker 0 00:06:48 Hopefully that, helps to visualize the section. I know VI.E.5.a.iii is hard to follow, but glad we have that up there. Thank you so much, Cory. Next slide please. Question three for Robert. can different types of activities be grouped together in one proposal?

Speaker 1 00:07:07 Yes, they can. Applicants may propose multiple activities as long as all the activities are eligible, and the NOFO provides examples of planning and policy activities, development activities, infrastructure activities, and preservation activities. Again, multiple activities are in fact eligible on, on a single application. And one point though is that an applicant, an eligible applicant may only submit one application.

Speaker 0 00:07:45 Next slide please. All right, question four for Corey, my geography appears twice in the priority geography spreadsheet. Once as a place, and once as a county, we're a priority geography under one, but not the other. Are we eligible for the 10 points under the need rating factor?

Speaker 2 00:08:08 Yes. If your geography shows a yes for priority geography with either county or place data, it is a priority geography. Some examples include Alexandria, Virginia and San Francisco, California. An updated version of the priority Geographies spreadsheet is posted to the PRO Housing webpage. Now, it's now sorted to better identify jurisdictions like these or appear more than once. There is no change to the data in this spreadsheet, just updated format.

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Speaker 0 00:08:44 Great, thanks, Corey. If we can move to the next slide. I think we are now going to take some of the questions that have been coming into the chat. Before we begin with that, I want to provide a quick reminder about the HUD Reform Act. This is a federal law that HUD competitions are governed by, and the HUD Reform Act means that HUD cannot provide advice about prospective proposals, including whether a proposal would be eligible or competitive. We cannot interpret the NOFO, but we can tell you whether something's in the NOFO or in the CDBG framework that the NOFO relies on. To underscore the NOFO is the definitive source of information for PRO Housing. That said, we will answer the questions that we can. So if your question's not answered today, please check the PRO Housing page for that updated FAQ document. Like I said, we've been updating that with some of the questions that have come in through this webinar series. With that, let's move on to our first question. If you'll give us a moment we're working to organize which questions we're going to respond to. So thanks for your patience there.

Speaker 1 00:10:14 Colin, I see a question about an MPO that we have an answer for, I think

Speaker 0 00:10:20 Yeah, I think this is a good one. So the question is, for an applicant that is an MPO, can an entitlement community commit CDBG funds as a match? And if so, would the consolidated plan need to be amended before the application due date in order to commit that match?

Speaker 1 00:10:41 That's an interesting question. So to clarify, the program doesn't require cost sharing or matching per se. However, there is leverage under which the applicant can, can score additional points. And if they were going to use CDBG funds as leverage, like any leverage as listed in the NOFO, you have to demonstrate a firm commitment. And to do that with CDBG funds, you would have to amend your consolidated plan most likely since you'd be using it, I suspect, for something that wasn't previously planned.

Speaker 0 00:11:21 And, I want to jump in and add to that. And Robert, if you could confirm, or maybe Jessie, if she's on the line. When would that con plan amendment need to take place? Is that only if they're selected for an award?

Speaker 1 00:11:36 I think it relates to the firm commitment of the, of the leverage for the application.

Speaker 3 00:11:48 Yeah, I mean technically if they're going for the leverage, leverage points, possibly they would use that as their documentation of firm commitment. But there isn't a requirement that they amend the consolidated plan. You know, aside from the scoring part, there is no requirement to amend the consolidated plan prior to finding out if they're going to get an award. So that's something applicants will have to read the NOFO and make their own decision on.

Speaker 1 00:12:17 Thank you, Jessie.

Speaker 1 00:12:21 That's Jessie Handforth Kome the director, the Office of Black Grant Assistance off camera there,

Speaker 3 00:12:28 Working in the back room this time.

Speaker 0 00:12:34 Great, well, we have another one that I want to go ahead and ask. Robert Corey, whoever would like to take this is one that I've, I've been seeing quite a bit, so I hope this will be helpful. We have a question about the allowable uses of HUD PRO Housing funds to establish a revolving loan

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fund program. Can you confirm that grant funding can be used to directly establish or seed a revolving loan program?

Speaker 1 00:13:00 I think I can take that one. This came up in the prior FAQ webinar, if I'm not mistaken as well, and the answer was that yes, that that would be something that is allowable under the standard CDBG program. The PRO Housing NOFO did not modify the requirements around revolving loan funds. It didn't remove them from eligibility or otherwise. So it is possible to do that. Yes.

Speaker 0 00:13:34 Thanks Robert. And I will add there there's a section about it in the NOFO. I'm pulling up the page now. I'll find it in a moment. We can put it in the chat or I'll pop it and mention it, but there is a section about revolving loan funds in the NOFO.

Speaker 1 00:14:08 Page 64.

Speaker 0 00:14:11 Thanks, Robert. We're getting a lot of questions about the public notice and public comment requirement. Robert Corey, I could also answer this one if we want. The NOFO lays out the public participation requirements. It's again, in section VI.E, and provides streamlined requirements. So you can read those there. As we emphasized earlier, applicants need to publish the PRO Housing application in its entirety. I believe, and hopefully Robert or Jessie can confirm, I think you can leave out the SF-424 form. So we do need to see the application published in its entirety, but that, that form, I think, doesn't fall under that. And that needs to be published for 15 days. So it needs to be 15 days of, of public comment window in order to meet the public participation requirements. Robert, Corey, anything you want to add to that?

Speaker 1 00:15:22 No, I think that's good. Major points for public hearing. 15 days for public comment.

Speaker 0 00:15:31 I'm seeing a related question about after that public comment window. So can you please elaborate on the requirement of responding to public comments for the application? Do we need to post our responses or just include them in the attachment with the application?

Speaker 1 00:15:56 Ultimately, it'd be included, your responses, the questions would be included.

Speaker 0 00:16:13 So as, as part of the application, you're required to include a summary by topic of all comments or views received on the application while it was available for public comment. A list of commenters by name or organization and summary of any comments or views not accepted and the reasons why. So that needs to be submitted to HUD, along with your application submission. As an asterisk to that, that summary does not count against your page limit for the NOFO, so don't worry about that being credited towards the page limit. But that summary is required. I will add, and I think we covered this in the previous FAQ webinar. I think HUD generally expects that applicants will incorporate, public feedback into their application. That's why we're providing for the public comment window. Jessie, I don't know if you want to expand on that, but that is the rationale there.

Speaker 3 00:17:11 Yeah, there's a question that's an interesting one about whether the hearing has to be before posting the proposed application. And we didn't speak to the timing in the NOFO because there's a range of practice in CDBG around that. But we do in many communities, comments on this sort of thing are active, and we wanted to provide that. That's a standard CDBG thing. We just shortened the period from 30 days in the main program to 15 here. We provided that waiver as part of this

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competition. It's an important part of community development practices. We need to know it's there and that you took it seriously. But otherwise just read the NOFO and follow what it says.

Speaker 0 00:18:05 Thanks for that. Can I follow up and confirm something? I think I'm hearing, so that 15 day window that is required before application submission, the NOFO does not require that before a public hearing, is that what you're saying?

Speaker 3 00:18:22 Don't believe that this NOFO speaks to the timing of the public hearing versus going out for public comment, but I don't have the NOFO right in front of me

Speaker 3 00:18:34 Both are required, both those two elements of, public participation are required.

Speaker 0 00:18:42 Thanks, Jessie. I want to take this one that I'm seeing briefly. Does public posting mean that all grant applicants have to submit their application days before the due date? And I think the answer is you're not necessarily required to do that. But that considering that you might want to incorporate public comments into your application, it might be prudent. And the other thing I'll add is that the NOFO does encourage applicants to get their applications in at least 48 hours ahead of time. That way you have some contingency in case of technical errors in grants.gov or something like that. There's a lot of language in the NOFO about that, but I know that it does suggest, 48 hour buffer. Please be aware of that and, and go read the relevant sections of the NOFO to get additional information there. Robert, Corey, is there anything else you would like to answer right now before we move on to our additional preselected questions?

Speaker 2 00:20:09 If there are some, some that we haven't answered yet, we can still get to them after we do.

Speaker 1 00:20:17 Please do continue putting your questions into the chat. Thank you.

Speaker 0 00:20:23 Great. Well, thanks Robert and Corey and Jessie. Let's move on. We have a few other preselected questions, and then, like Robert and Corey said, we're going to take a few more live audience questions at the end of the presentation. Next slide please. Corey, I'll throw this one to you. does the 10% limit on general administrative costs and technical assistance, does that 10% limit apply to all proposed technical assistance activities?

Speaker 2 00:20:52 No. Under section III.F.2 the NOFO provides TA as an eligible activity. Under certain circumstances, this activity related TA is not the same as general ta. Activity related TA is not subject to the 10% cap.

Speaker 0 00:21:14 Next slide please. Robert, what types of funding can I use as leverage?

Speaker 1 00:21:25 Grantees may use either non-federal sources, other federal sources as financial leverage, only if programs authorizing statute permits that use.

Speaker 0 00:21:39 Thanks, Robert. We'll take this moment just to emphasize too, that leverage is not the same thing as match. This program does not require cost matching, but applicants can receive points for leveraged funds based on the percentage of their total funding request. Thanks, Robert. Next slide please. Corey. Would a public housing authority need to form a multi-jurisdictional entity along with an eligible applicant in order to be considered eligible to apply?

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Speaker 2 00:22:16 The PHA is not an eligible applicant on its own. In some states, the PHA may be a subdivision of the municipal or county government, such as serving both as a city's housing department and as the PHA and be able to apply. Alternatively, the PHA could be one member of the larger partner partnership of local governments, public agencies that comprise a multi-jurisdictional entity.

Speaker 0 00:22:47 Thanks, Corey. Next slide, please. All right, and I think this is our last preselected question. Robert, can HUD help interpret the NOFO, and could a prospective applicant maybe set up a phone call with the PRO Housing team?

Speaker 1 00:23:08 Someone I know recently said, I don't look good in orange <laugh>. So no, under the HUD Reform Act, HUD cannot provide advice about prospective proposals. That means HUD cannot answer questions about specific proposals, including whether proposal would be eligible or competitive. Applicants should rely on the NOFO as the definitive source of information about your PRO Housing competition.

Speaker 0 00:23:46 Great. I think we can move to the next slide. Thanks again, Robert and Corey, for taking those questions. We are going to use the remainder of our time to take as many remaining chat questions as we can. So again, if you have questions in the audience, please put those in the chat, address them to all panelists, and we will do our best to answer the ones that we can. We'll take a moment to pick our next question.

Speaker 1 00:24:17 See a question in the chat about non entitlement communities.

Speaker 0 00:24:33 Would you like me to take that one, Robert?

Speaker 1 00:24:34 Yeah, go ahead.

Speaker 0 00:24:36 Certainly, I'm double checking now, but, I think our definition of local government provides for entitlement and non-entitlement communities to apply. Is that right?

Speaker 1 00:24:43 Yeah, that's correct. It does, yeah. Therefore, as a local government, you're eligible regardless of your entitlement or non-entitlement status.

Speaker 0 00:25:00 I'm seeing more questions about the public comment window, specifically about documentation. What kind of documentation is needed to ensure that it's been published for 15 days?

Speaker 2 00:25:19 I can take this one. The NOFO doesn't provide details on the kind of documentation that is necessary for the public hearing, but the publication must include prominent posting on the applicant's official website and afford the public, affected local governments, and other interested parties a reasonable opportunity to examine the plan, and the contents of the amendment. The topic PRO Housing must be navigable by the applicant's homepage. And again, applicants have to hold the one public hearing to solicit comments on that submission.

Speaker 0 00:26:05 Thanks, Corey. and, and just, I know we've touched on this a lot, but just because I'm seeing it in the chat quite a bit. As a reminder, that window is 15 days for public comment.

Speaker 2 00:26:24 Did we get to the question on the window of publication of the NOFO?

Speaker 0 00:26:32 Which one do you mind,

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Speaker 2 00:26:34 Someone expressed concern about the time between the publication of the NOFO and the deadline, that October 30th deadline that you talked about up front, and it being difficult to prepare an application in time. We do understand it's a relatively short timeframe from the date of publication of the NOFO, which was announced earlier this month. And that is why HUD published the preview to allow that extra time, that 90 days to prepare an application. So, the October 30th date is the deadline for application submissions.

Speaker 0 00:27:23 Thanks, Corey. I am going to take this question about leverage that I'm seeing, and I might ask for some support from Robert and Corey if you guys can. So someone writes in the leverage funding section, so page 41 of the NOFO that's rating factor D that says endorsements or general letters of support alone will not count as resources and should not be included in the application end quote. Are applicants not allowed to include letters of support for leverage funding or in general? I would not go so far to say you're not allowed to. I think what the NOFO is saying with this quotation, and thanks for raising this, is we're underscoring that leverage funding needs to be firmly committed, and that term is defined in the NOFO. We can, we can pull it up for you. but what that means is that the funding amount needs to be firm and set in stone.

Speaker 0 00:28:16 And that specific amount needs to be, signed off on by an authorized party need to have a letter expressly committing that funding amount from that source for this program. So the NOFO uses this sentence to, to emphasize that a general letter of support or a general commitment that doesn't have a specific funding amount, is not sufficient to get you points for that leverage. Remember, leverage is a point scoring thing in this program. This program does not require cost matching or cost sharing. But applicants will receive points for leverage based on the percentage of their funding request. And that leverage needs to be firmly committed. And there's some other requirements that are all listed in rating factor D, so you can go review those there. Robert, Corey, anything to add to that one?

Speaker 1 00:29:05 Oh, no, that's right. Yeah. Any, letter of support, there's not a place in the NOFO that that's responsive to. For leverage, we're looking for firm commitments and there's partnership letters. I don't know if maybe the reviewer was inquiring about those, but we do have templates as well for those. That's not, doesn't seem to be related to this question. So there wouldn't be any points for that type of a support letter.

Speaker 0 00:29:42 I'm seeing a related leverage question that I'll tackle. If funds have been used to purchase land for affordable housing in 2023, can it be used as leverage? I will start by saying that I think this is wading into territory that becomes difficult for us to answer vis-a-vis the reform act that we're not allowed to comment on specific proposals. And so we unfortunately can't give you advice in this scenario in particular, what I will say is to direct you to rating Factor D, where the NOFO provides that non-quantifiable contributions. Well, there's, there's a couple of things, actually, two things. So I misspoke. The first thing is that applicants may credit the dollar amounts of any non-financial contributions towards their percentage of leverage commitments. So something like donations of land or property would be eligible to be counted as part of your leverage. The second thing that I'll add is that we write in the NOFO, HUD may also award points for clear and compelling non-quantifiable contributions to the project that significantly advance the project's goals up to the maximum of 10 points. So unfortunately we can't comment further on the specific proposal, but I hope that that language from the NOFO helps to clarify the leverage grading factor.

Speaker 1 00:31:49 Thanks. We have a team working on the background, help us with answers.

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Speaker 2 00:31:58 I think we got a question just confirming on the public comment period, posting on its website for 15 days and the in-person public hearing, so that is correct.

Speaker 1 00:32:16 Follow-up on question about the letters of support. We noted you don't get points. Will they help with your general competitiveness? Again, the NOFO doesn't ask for letters of support.

Speaker 0 00:32:54 Keep them coming folks. We'll welcome any additional questions that folks want to put in the chat.

Speaker 1 00:33:01 Wait and see if anybody has anything more. And then if not, we're going to call it a day.

Speaker 2 00:33:08 I think there's a, there's a question there about additional webinars or is this the final one? So you want to let everyone know?

Speaker 0 00:33:15 Maybe Jessie could speak to it. I actually don't know the answer to that one.

Speaker 3 00:33:22 Hey, and I think Savin's also lurking in the background here. I don't believe that we have another webinar planned right now and attendance has dropped off some and we're starting to see applications and public hearings advertised as we're Googling around. We're open to having more webinars, but, probably not at this point. I think it's time to read the NOFO and, and really dig in. You can always send additional questions to the mailbox at CDBG-PROHousing@HUD.gov, and we have a team standing by.

Speaker 0 00:34:07 Thanks, Jessie.

Speaker 1 00:34:10 So if you missed any prior webinars, they are recorded and posted as will be this webinar.

Speaker 0 00:34:19 Yep. And like we stated earlier, I think the first four recordings and slides, those are all available. And then numbers five and six, so those are the environmental considerations and the fair housing considerations, those are under processing by our web team and those are going to be posted on the PRO Housing landing page as soon as we can. So keep an eye out for those recordings.

Speaker 0 00:35:37 Great, well with that, we may call it for the day. Thank you so much to everyone who has attended this webinar and all webinars in this series. I know this is number seven, so we appreciate your continued attendance and we hope that this was helpful. Thank you to our presenters and like we mentioned, the recording of this webinar and the slides that go along with it will be available as soon as we can get that posted on the PRO Housing webpage. Don't forget that you can always email us CDBG-PROHousing@HUD.gov, and our team will do our best to respond by the next business day. With that, we wish you all a great day. Thanks again for attending.