

FY 2021 Comprehensive Housing Counseling Grant Program NOFO

Frequently Asked Questions

Keywords for entire section: Housing Counseling, Grant, CHC, Comprehensive Housing Counseling, NOFO, NOFA, FY21, FY 2021, HCA, Funding

Section 1. General

1.1 What are the new items being scored in the FY 21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: There are no new Rating Factors in the FY21 NOFO. However, there is a new funding incentive for housing counseling agencies to work in conjunction with Historically Black Colleges and Universities, Tribal Colleges and Universities, and other Minority Serving Institutions (MSIs). For full details on scoring and point allocation, see Section V *Application Review* Information in the grant application package. Download the grant package at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

1.2 Do I need to inform HUD if our organization has a structural change or merger during the FY 21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application process or period of performance?

Answer: Yes. Anticipated organizational changes must be reported to your HUD Point of Contact (POC) at least 15 days in advance. HUD approval needs to be obtained for these changes. For more information, see the *Mergers, Acquisitions, and Other Changes in Organizational Structure* subsection of Section V.B *Review and Selection Process* in the FY 21 CHC NOFO. Download the grant package at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

1.3 Can applications under the FY 21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) be submitted by applicants in the form of a paper copy? Or must the application be submitted through the Grants.Gov online process?

Answer: An applicant demonstrating good cause may request a waiver from the requirement for electronic submission (for example, a lack of available Internet access in the geographic area in which the applicant's business offices are located). For applicants that cannot submit their applications electronically, HUD must receive the applicant's waiver request at least 15 days before the application deadline. If HUD waives the requirement, HUD must receive your paper application before the deadline of this NOFO. To request a waiver and receive a paper copy of the application materials, you should contact: housing.counseling@hud.gov.

1.4 Will the Office of Housing Counseling offer a general training on the FY 21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) ?

Answer: Yes. the Office of Housing Counseling will provide an FY21 CHC NOFO webinar training. This will be advertised through the Office of Housing Counseling's mailing list. It will also be [archived on](#)

[HUD Exchange](#) for those that miss the live webinar. The archive will provide the audio, presentation, and transcript of the training. Click [here](#) to sign-up for the Office of Housing Counseling's mailing list.

1.5 Does the use of FY21 Comprehensive Housing Counseling Grant Program (CHC) funds cover all aspects of our housing counseling program?

Answer: FY21 CHC grant funds may be used to support both direct program costs and appropriate indirect costs. Grantees and subgrantees will be reimbursed only for program costs that are incurred pursuant to the eligible activities outlined in Section IV.F *Eligible Activities* of the FY 21 CHC Notice of Funding Opportunity (NOFO) and applicable grant agreement. (See [CFR 200.413](#) for additional guidance on direct cost)

1.6 How do we know if a cost is eligible under the FY21 Comprehensive Housing Counseling Grant Program (CHC) grant?

Answer: In creating their budget for approval, grantees receiving funds under the FY21 CHC Notice of Funding Opportunity must show in detail how the direct cost is incurred pursuant to an eligible activity. The eligible activities are:

- Housing counseling and group education;
- Oversight, compliance, and quality control;
- Supervision of housing counseling staff;
- Housing counselor training and certification; and
- Marketing and outreach initiatives of the housing counseling program to potential clients.

HUD will evaluate whether direct costs are incurred pursuant to an eligible activity. Also, costs must be reasonable and properly allocated ([See 2 CFR 200, Subpart E](#)). The grantee must be able to justify and document the connection between the direct cost and the eligible activity.

1.7 How can our agency be reimbursed for indirect costs incurred as a result of our housing counseling grant activities? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: There are two methods for billing indirect costs. An agency may apply an approved negotiated indirect cost rate to the grant to be reimbursed for indirect costs. If your agency does not have an approved indirect cost rate agreement and would like to be reimbursed for indirect costs, your agency may be able to use the 10 % de minimis rate allowed under [2 CFR Part 200](#).

For more detailed information on indirect cost rate requirements, please see [2 CFR Part 200.414](#), Appendix IV.

If HUD is your agency's federal cognizant agency and you would like to submit an indirect cost rate proposal for approval, contact your HUD Point of Contact (POC) for instructions on submitting IDC proposals.

1.8 Question: What is program income under the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: For a definition of program income, please see guidance provided in [2 CFR Part 200.307](#). (Program income).

1.9 Question: What is the additive method for program income? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: The Housing Counseling Program uses the additive method for program income. Any program income earned by a grantee must be added to their budget for the period of performance for that award. See [24 CFR 200.307\(e\)](#).

1.10 My organization was recently approved by HUD to participate in the Housing Counseling Program. Are there any requirements unique to us as a first-time applicant under the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: Yes. Applicants that received approval as a HUD housing counseling agency after September 30, 2020 would not have submitted a form HUD-9902 covering the period October 1, 2019 through September 30, 2020. As such, these newly approved applicants must include a HUD-9902 for the period October 1, 2019 through September 30, 2020 with their FY21 NOFO application package. Applicants that were previously required to submit a HUD-9902 will be evaluated based on the data in HUD's Housing Counseling System (HCS).

The Applicant should have a registered for a DUNS number. Applicants cannot file an application in Grants.gov without an active DUNS number. DUNS numbers are issued by Dun & Bradstreet at no cost. The website can be found [here](#).

Applicants must also be registered on the Federal government's System for Award Management (SAM).gov site. The website can be found [here](#). This registration must be current.

1.11 Must an Intermediary or Multi-State Organization (MSO) select Subgrantees through a Request for Proposals process for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: No. Applicants may use a method of their choosing to select members of their housing counseling subgrantee network. The Grantee must ensure that all affiliated subgrantees comply with the standards described in the NOFO and HUD Regulations ([24 C.F.R. 214](#)) and Office of Management and Budget (OMB) regulations at [2 CFR part 200](#).

1.12 Are there FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) reporting requirements for state or local governments that make subawards?

Answer: Yes. If a state or unit of general local government grantee makes assistance available on a competitive basis to affiliates or subgrantees, then they shall notify the public. The notification shall contain the elements required by [42 U.S.C. § 3545\(a\)\(4\)\(C\)\(i\)](#). This notification may be by any method conducive to providing information to the public.

Additionally, any subawards greater than \$25,000 must be reported in the [Federal Funding Accountability and Transparency Act Subaward Reporting System \(FSRS\)](#).

1.13 My organization experienced a change in our Client Management System (CMS) provider during FY 20. As a result, we experienced difficulties submitting our HUD-9902 report through our CMS. We manually reported our housing counseling activity in HCS, and the reports were late. Will our FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application be penalized for manually submitted and untimely reporting?

Answer: The Office of Housing Counseling (OHC) is aware of CMS-related changes that affected participating Housing Counseling Agencies during the 2020 Fiscal Year. These will be considered during scoring. OHC guidance indicates that agencies should submit the HUD-9902 prior to the reporting deadline to account for such instances and allow for manual entry when required. The [Housing Counseling Online 9902 Toolkit](#) provides a reminder that “If your agency is a HUD housing counseling grantee, failure to report will affect timely processing of grant vouchers and *may negatively affect your agency’s scores in HUD housing counseling grant competitions.*”

1.14 My organization tried to submit our HUD-9902 report through our Client Management System (CMS). The submission failed, causing the report to be late. Will our FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application be penalized for untimely reporting?

Answer: This may affect your score related to timely HUD-9902 reporting. Office of Housing Counseling (OHC) guidance states that agencies should submit the HUD-9902 prior to the reporting deadline to account for such instances. The OHC NOFO team will evaluate timeliness across *all* quarters of FY20. This should ease concerns related to one-time reporting issues. Note that the [Housing Counseling Online 9902 Toolkit](#) provides a reminder that “If your agency is a HUD housing counseling grantee, failure to report will affect timely processing of grant vouchers and *may negatively affect your agency’s scores in HUD housing counseling grant competitions.*”

Applicants may request a debriefing under the procedures outlined in the NOFO. During a debriefing, the applicant may present evidence if they believe that an error occurred in the scoring of the application.

1.15 The FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) states that “Applicants and Subgrantees 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.” How should an applicant provide this information?

Answer: The applicant or subgrantee must provide a written statement describing the OIG audit or investigative work active at the time of application. This statement can be added as an attachment to the application. See Section IV. *Application and Submission Information* for attachment instructions. Download the grant package at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

1.16 How are the grant funds awarded under the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) allocated?

Answer: FY21 CHC NOFO funding methodology awards grantees a base award determined by the size and nature of their counseling networks. The methodology then augments that amount based on performance within HUD's CHC Program and other relevant criteria. See Section II *Award Information* and Section V *Application Review Information* of the FY21 CHC NOFO for more information. Download the grant package at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

1.17 The FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) instructions list the period of performance as April 1, 2021 through September 30, 2022. Is this a 2-year NOFO?

Answer: The FY21 CHC NOFO is a "two-year NOFO" in that successful applicants who express interest and remain eligible Housing Counseling Program participants will not need to reapply for funding in the next fiscal year. However, the FY21 funds and the FY22 funds are separate awards. Each will have its own HUD-1044 form, grant agreement, and period of performance.

As noted in Section I.A.2, *Changes from Previous NOFO*, "HUD will use the grant applications received for FY 202021 and the corresponding scores and funding methodology to make awards for FY 2022, subject to the availability of appropriations." Download the grant package at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

1.18 When determining subaward amounts for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO), should we place greater importance on the total number of housing counseling clients served by the agency or the total number of housing counseling clients served exclusively with the HUD CHC grant funds?

Answer: Grantees that manage a network of subgrantees and branches should choose the allocation method that best meets their priorities and objectives. Download the grant package at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

1.19 Why is the FY21 Comprehensive Housing Counseling Grant Program (CHC) period of performance starting on April 1, 2021 (six months into the fiscal year) and not starting on October 1, 2020 (the beginning of the fiscal year)?

Answer: The Office of Housing Counseling (OHC) is exploring a potential realignment of the grant period of performance to be prospective in nature. FY21's six-month delayed start date is the beginning of a gradual shift of the period of performance. Because of this change, HUD may allow Applicants to seek reimbursement for costs incurred prior to the period of performance but no earlier than October 1,

2020. For more information, see Section IV.F of the NOFO. Review the NOFO and download the grant package at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

1.20 Are successful applicants able to charge the FY21 Comprehensive Housing Counseling Grant Program (CHC) award for costs incurred prior to the period of performance?

Answer: HUD may allow Applicants to seek reimbursement for costs incurred prior to the Period of Performance but no earlier than October 1, 2020. Applicants should state whether they intend to seek reimbursement for such costs on form HUD-9906, Chart A, Field R. All costs incurred before the federal awarding agency makes the federal award are at the recipient's risk (i.e., the federal awarding agency is not required to reimburse such costs if the recipient does not receive a federal award or if the federal award is less than anticipated and inadequate to cover such costs). Applicants that indicate in their Notice of Funding Opportunity (NOFO) application that they intend to seek reimbursement for these costs must submit a justification of incurred costs during the grant execution process. Download and view the grant application instructions at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

Section 2. Applicant Eligibility

Approval, Approved, Agency, Certified, Counselors, SHFA

2.1 Who is eligible to apply for FY 21 Comprehensive Housing Counseling (CHC) Grant funding?

Answer: All housing counseling agencies (including LHCAs, Intermediaries, and MSOs) approved by HUD to participate in the Housing Counseling Program prior to the NOFO issue date, along with State Housing Finance Agencies (SHFA) who meet the Eligibility requirements published in the Notice of Funding Opportunity (NOFO) are also eligible to apply. Housing counseling agencies that have not received HUD approval but meet the Housing Counseling Program approval criteria at [24 C.F.R. § 214.103](#) are encouraged to affiliate with a HUD-approved Intermediary or SHFA. For more information, see Section III *Eligibility Information* of the FY 21 CHC NOFO. Download and view the grant application instructions at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

2.2 What are the recordkeeping and reporting requirements for FY21 Comprehensive Housing Counseling (CHC) grant recipients?

Answer: FY21 CHC grant recipients must submit several reports to the Office of Housing Counseling over the grant period. These reports include Grant Activity Reports (GAR) and quarterly submissions of the HUD-9902 reports in the Housing Counseling System (HCS). GARs include reporting elements reflecting performance goals, objectives, and accomplishments for the award. See Section III. *Eligibility Information/Program-Specific Requirements Affecting Eligibility* and Section VI.C.3 *Award Administration Information/Reporting* of the NOFO and the FY 21 CHC Grant Agreement. Download and view the grant application instructions at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

Also, this funding is subject to all Office of Management and Budget (OMB) guidance and government-wide regulations for federal financial assistance programs. See [2 C.F.R. Part 200](#), related FAQs, [archived webinars on the HUD Exchange website](#), and the grant agreement for more details on federal funding requirements.

2.3 Are non-HUD approved housing counseling agencies eligible to apply for funding under the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: No. Housing counseling agencies that have not received HUD approval prior to the FY21 CHC NOFO issue date but meet the Housing Counseling Program eligibility criteria set forth at [24 C.F.R. Part 214](#) can seek affiliation with a HUD-approved Intermediary or State Housing Finance Agency (SHFA) to access subgrant funding. Individuals, foreign entities, and sole proprietorship organizations are not eligible to directly apply for awards made under the CHC NOFO.

2.4 Must our agency's housing counselors be HUD-certified for us to receive an FY21 Comprehensive Housing Counseling (CHC) grant?

Answer: Yes. If a grantee has no certified counselors on staff as of August 1, 2021, the agency will be ineligible to receive grant funding or participate in the housing counseling program until this

noncompliance is resolved. Download and view the grant application requirements at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

2.5 Our State Housing Financing Agency (SHFA) is not currently participating in HUD’s housing counseling program. We would like to apply under the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) as a new applicant. Is our SHFA eligible to apply?

Answer: Yes. SHFAs are eligible for this NOFO if they have state statutory authority to provide housing counseling throughout their entire state and adhere to all Housing Counseling program requirements in [24 C.F.R. Part 214](#), [HUD Housing Counseling Handbook 7610.1 REV-5](#), and other governing documents. An SHFA that is not currently participating in HUD’s housing counseling program that applies under the NOFO as a new applicant must manually submit its FY 20 (i.e. October 1, 2019 – September 30, 2020) [HUD-9902 data](#) with its NOFO application. When completing the NOFO application, such applicants do not need to fill in the data fields asking for the Housing Counseling System (HCS) ID on the HUD 9906-P [Intermediary, State Housing Finance Agency, and Multi-State Organization Application] and Chart A2 Supplement.

2.6 We are a newly approved parent agency (*Intermediary; Multi-State Organization or SHFA with Participating Agencies, Subgrantees and/or Branches*). Therefore, we did not have a housing counseling network in FY20. Will our application be different when applying under the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: Yes, for an applicant that was not listed in Housing Counseling System (HCS) as a parent agency during FY 20 (for instance, because they were a Local Housing Counseling Agency (LHCA) during FY 20 or they were a State Housing Finance Agency (SHFA) that was not participating in the housing counseling program), HCS will not have data that reflects their current status as a parent agency. Therefore, such applicants are required to manually submit an FY 20 (i.e. October 1, 2019 – September 30, 2020) HUD-9902 reflecting their network. New applicants that were HUD-approved parent agencies during FY 20 will have their past performance scored on the HCS data that reflects their network during FY 20. Download and view the grant application requirements at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

2.7 We are a HUD-approved Intermediary that did not receive FY 20 Comprehensive Housing Counseling (CHC) funding. We are adding a Subgrantee to our housing counseling agency network for FY 21. As a result, our HUD-9902 data for FY 20 does not include that Subgrantee’s housing counseling activity reporting. Can we submit this new subgrantee’s HUD-9902 data along with ours to count those clients for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: No. For applicants that were a HUD-approved Intermediary in FY 20, HUD will use the applicant’s HUD-9902 information as reported in the Housing Counseling System (HCS), based on the network composition that existed in FY 20. However, the applicant is rated on several criteria that considers an applicant’s proposed network composition. Download and view the grant application requirements at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

2.8 Our organization received FY20 Comprehensive Housing Counseling (CHC) funds. Can we still apply for the FY21 CHC funds?

Answer: Yes, receiving a FY 20 CHC grant does not disqualify an otherwise eligible agency from applying for the FY 21 CHC grant. Download and view the grant application requirements at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>

Section 3. Grants.gov/Technical Issues

Additional Keywords: Submit, instructions, grants.gov

3.1 How do we submit the grant application for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: Applicants should review the FY21 CHC NOFO first. Organizations must submit applications online at Grants.gov. Individuals who will submit grant applications on behalf of an organization must register at [Grants.gov](https://www.grants.gov) and be listed as the Authorized Organization Representative (AOR) in [SAM](#). Grants.gov registration involves several steps and may take a few weeks to complete. Registration instructions are on the Grants.gov website.

Applicants must download both the Application Instructions and the Application Package from Grants.gov. Verify that you are submitting your application for the correct funding opportunity. Applications will only be considered for the competition indicated on the submission.

Validated Grants.gov submissions will receive a confirmation of receipt and an application tracking number. If you do not receive a confirmation and tracking number, your application has not been considered received by Grants.gov. Only completed applications received by Grants.gov on or before the deadline will be considered timely submissions.

3.2 Where can I find instructions on downloading the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) grant application from Grants.gov and submitting my application?

Answer: See Section IV *Application and Submission Information*, of the FY21 CHC NOFO. This contains information on how to download the application and submit materials. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

3.3 I am having an issue with the Grants.gov system. Who can I contact for assistance?

Answer: Grants.gov offers customer support 24 hours a day, seven days per week, except on Federal holidays. Applicants may call 1-800-518-4726 (toll-free) or send an email to Support@Grants.gov. Persons who are deaf or hard of hearing, or who have speech disabilities, may contact customer support through the Federal Relay Service's teletype service at 1-800-877-0996.

3.4 I submitted an application in error on [grants.gov](#). Can I withdraw my application?

Answer: There is no way to withdraw a submission once it has been submitted. However, an applicant can submit an updated version of their application on [Grants.gov](https://www.grants.gov). HUD will only review the last application received.

3.5 I cannot find the *Certification Regarding Lobbying* that is described in the Application Checklist.

Answer: [Grants.gov](https://www.grants.gov) has labeled the *Certification Regarding Lobbying* as the *Grant.gov Lobbying Form*.

Section 4. Forms

Additional Keywords: Forms, Type, SF-424, HUD-2880

- 4.1 On the SF-424 signature page, should I sign and scan the document to upload it to Grants.gov with the Executive Director’s signature, or is there an electronic signature for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?**

Answer: Both the SF-424 and HUD-2880 forms allow electronic signatures. The SF-424 and several of the other required forms can be completed as web-forms in Grants.gov. Instructions on completing Grants.gov web forms can be found in the [grants.gov online user guide](#).

Additionally, the [SF-424 instructions](#) available on Grants.gov indicate that for line 21 of the form, “If the application is submitted via Grants.gov, the signature of the authorized representative and the date signed are completed upon submission.”

The Office of Housing Counseling will also accept SF-424s that have been signed, scanned, and uploaded in PDF format to Grants.gov.

- 4.2 On the SF-424, which box should I check for Question 2 “Type of Application” for the CHC NOFO? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)**

Answer: Applicants should check “new” on Question 2 for “Type of Application” on the SF-424. Review the grant application instructions downloaded from [www.grants.gov](#).

- 4.3 Is the form HUD-2880 Applicant/Recipient Disclosure/Update Report applicable to the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?**

Answer: Yes, it is required for entities applying for all HUD funding. See instructions for completing the form HUD-2880, [here \(pages 2-3\)](#).

- 4.4 Which box should I check: “Initial Report” or “Update Report” on the form HUD-2880 Applicant/Recipient Disclosure/Update Report? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)**

Answer: When applying for HUD assistance, check the box “Initial Report” on the form HUD-2880 Applicant/Recipient Disclosure/Update Report. After you receive the funds and, if applicable, check the box “Update Report” (filed by “Recipients” of HUD Funding). All recipients of covered assistance must submit updated reports to HUD to reflect substantial changes to the initial applicant disclosure reports. See instructions for completing the form HUD-2880, [here \(pages 2-3\)](#).

- 4.5 There are several questions on the SF-424 and HUD-2880 that ask for a dollar amount. Can you provide guidance on the dollar amounts that should be entered on these required forms**

for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: On the SF-424, line 18a Applicants should enter a response of \$1.00. Applicants may also indicate, but are not required to, the maximum grant request on Chart A, Field Q of form HUD-9906. This amount, if provided, will also be considered in the funding methodology as a cap for setting the maximum grant amount for that Applicant.

On Form HUD-2880 Applicant/Recipient Disclosure/Update Report, line 4 “Amount of HUD Assistance Requested/Received,” Applicants may enter \$1.00. The amount entered on this line will not be used by HUD as a cap in establishing the maximum grant amount for the Applicant. Applicants should not enter the amount received from HUD in prior grants on this line, as this is an “initial report” and not an “update report.” Review the grant application instructions downloaded from www.grants.gov.

On the HUD-2880, regardless of the amount listed in line 4, Applicants that have received, or expect to receive HUD assistance for housing counseling in excess of \$200,000 during FY21 must select “yes” under question two in “Part I Threshold Determinations,” and complete the rest of the form. See instructions for completing the form HUD-2880, [here \(pages 2-3\)](#).

4.6 On the SF-424, is the Applicant Identifier (line 4) the same number as the Agency ID number in HCS? Also, where can I find the Federal Entity Identifier (line 5a)? Is the Federal Award Identifier (line 5b) our grant number? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Applicants do not have to enter an Applicant Identifier on Line 4 of the SF-424. On the SF-424, Applicants may leave lines 4, 5a, and 5b blank. Review the grant application instructions downloaded from www.grants.gov.

Section 5. Application/Charts

Additional Keywords:

Completing, Chart, Charts, Application, Updating, Submitting, Bonus Points

5.1 Are there narrative sections to the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application?

Answer: Yes. There are narrative sections in the HUD-9906 Charts. See Section IV *Application and Submission Information* of the FY 21 NOFO for details. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.2 Are the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) applications for Local Housing Counseling Agencies (LHCAs) the same as those for Multi-State Organizations (MSOs), Intermediaries, and State Housing Finance Agencies (SHFAs)?

Answer: No, there are different NOFO application packages. The application for LHCAs includes Form 9906-L and the 9906 Chart B Supplement (if the applicant has leveraged funds). The application for MSOs, Intermediaries, and SHFAs includes Form 9906-P, the 9906 Chart A2 Supplement (required), and the 9906 Chart B Supplement (if the applicant has leveraged funds). See Section IV.B.2 (*Application and Submission Information*) of the Comprehensive Housing Counseling Grant Program NOFO. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.3 How do applicants earn points for Emergency Preparedness or Disaster Recovery in the CHC NOFO? (This question is applicable to the FY21 Comprehensive Housing Counseling NOFO only.)

Answer: For the FY21 CHC NOFO there are no longer preference points for “Emergency Preparedness/Disaster Recovery.” View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.4 What is the WinZip file in the [grants.gov](#) application for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: In the WinZip instruction package, you will find the following:

- Comprehensive Housing Counseling NOFO (PDF)
- Form HUD-9906-L, Local Housing Counseling Agency Application (PDF)
- Form HUD-9906-P, Intermediary, State Housing Finance Agency, and Multi-State Organization Application (PDF)
- Form HUD-9906, Chart A2 Supplement (for Intermediaries, SHFAs, and MSOs) (Excel)
- Form HUD-9906, Chart B: Leveraged Resources (Excel)
- Form HUD-9906, Chart E: Use of Funds (Excel)
- Form HUD-50153, Certification of Consistency with Promise Zone Goals and Implementation (PDF)

Applicants can view the [Grants.gov Online User Guide](#) here for more information, or contact [grants.gov](#) Applicant Support at 1-800-518-4726, or support@grants.gov for more information on form submission.

5.5 What are the requirements for claiming the Promise Zone bonus points in the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: To receive bonus points related to [Promise Zones](#), an Applicant and/or its Subgrantees must obtain the required certification on Form HUD-50153. This form must be signed by the authorized official of the designated Promise Zone to verify that the Applicant and/or its Subgrantees have met the requirements. Form HUD-50153 can be found [here](#). A complete listing of Promise Zone authorized officials can be found [here](#).

The physical location of the Applicant's or Subgrantee's office(s) is not specifically identified as a criterion for establishing eligibility for the Promise Zone points. Form HUD-50153 has certain geographic criteria that must be met for the proposed activities and projects to be undertaken in connection with a Promise Zone. The authorized official must certify that:

- 1) The applicant is engaged in activities, that in consultation with the Promise Zone designee, further the purposes of the Promise Zones initiative; and
- 2) The applicant's proposed activities either directly reflect the goals of the Promise Zone, or will result in the delivery of services that are consistent with the goals of the Promise Zones initiative; and
- 3) The applicant has committed to maintain an on-going relationship with the Promise Zone designee for the purposes of being part of the implementation processes in the designated area.

Further questions related to Promise Zone designees and Authorized Officials can be sent to: promisезones@hud.gov.

5.6 On the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) HUD-9906-P charts, should Intermediaries, SFHAs, or MSOs include Subgrantees and/or Branches that may have been providing housing counseling during a part of FY 20 but will not be seeking funds from the FY 21 Comprehensive Housing Counseling NOFO?

Answer: Review Section V.A, Rating Factors of the FY 21 NOFO. In this section, each of the rating factors and related charts are explained in detail. It includes instructions on which Subgrantees and/or Branches should be reported. As a general rule, the HUD-9906 Charts require information only for proposed subgrantees and/or branches that the Applicant will fund under the FY 21 Comprehensive Housing Counseling NOFO. Accordingly, information on past subgrantees and/or branches to which funds will not be subgranted under the FY 21 NOFO should not be included. Review the grant application instructions downloaded from <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>.

5.7 What are the scored items not covered in the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) HUD-9906 Charts?

Answer: HUD will use internal data sources to score the following items:

- Average length of a Home Equity Conversion Mortgage (HECM) counseling session
- Performance Review findings
- Proportion of rural clientele
- Total number of clients
- Services provided
- Timely validation of agency Housing Counseling System (HCS) profile
- Timely submission of HUD-9902 reports
- Use of a client management system (CMS) to submit HUD-9902 reports
- Positive outcomes of counseling (HUD-9902 Section 10)

View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.8 Will Intermediaries that are funded through the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) be able to make changes to their subgrantee list?

Answer: Yes, Intermediaries will be able to make changes to their Subgrantee list after awards are made. To do this, they must submit a written request and detailed justification to HUD. These requests for amendments are required and are subject to HUD approval. HUD reserves the right to adjust the award amount granted through this or previous NOFO(s) if the number of a Grantee's network of Subgrantees and funded Branches changes significantly from that proposed in the grant application. For an Intermediary, State Housing Finance Agency (SHFA), or Multi-State Organization (MSO), a significant change might include, but is not limited to, a 25 percent or greater decrease in the number of their subgrantees and funded Branches from that stated in their grant application.

View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.9 On the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) Chart A2 Supplement (Excel), must I list the census tract numbers for all of my branches and subgrantees?

Answer: No. You only need to list the census tract numbers for those Branches and Subgrantees located in an Opportunity Zone. Then, transfer the total number of such Branches and Subgrantees from the bottom of Chart A2 Supplement (Excel), Column O1 to the appropriate location in Chart A2, Field O1 (pdf). Review the grant application instructions downloaded from <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>.

5.10 How do I know if my agency, or affiliated subgrantees, are located in an Opportunity Zone? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Agencies should review the Community Development Financial Institutions (CDFI) Fund's Resources [here](#) to help determine Opportunity Zone locations and eligibility. Additionally, the CDFI Fund's mapping tool is available, [here](#).

5.11 What is the Opportunity Zone (OZ) Certification Form for the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: The OZ Certification Form Opportunity Zone Preference Points ([HUD-2996](#)) is a form for all HUD grant applications that offer Opportunity Zone preference points. Applicants must complete and submit this form with their NOFO application to be eligible for these points.

5.12 How do I apply to receive Opportunity Zone preference points under the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: Applicants must complete the Opportunity Zone Certification Form, [HUD-2996](#) to be eligible for Opportunity Zone (OZ) preference points. To receive these points, applicants must indicate in the form that they will use at least 50% of the award in OZ census tracts.

If an applicant indicates that they will be using less than 50% of awarded funding in OZ census tracts they should use the narrative section on pg. 2 of the HUD-2996 to either: (1) indicate the reason(s) they are unable to expend at least 50% of the grant award within Opportunity Zone-designated tracts, or (2) make a compelling case as to why the amount they propose to expend will have a significant impact within Opportunity Zone-designated tracts.

5.13 The Certification for Opportunity Zone Preference Points asks for “Opportunity Zone Census Tract(s) which the proposed activities/projects will benefit.” If I am applying to the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) as an intermediary, multi-state organization (MSO), or state housing finance agency (SHFA), must I list all of the OZ census tracts our network agencies are located in?

Answer: If your network has multiple agencies located in Opportunity Zone census tracts, you may state this in the Certification for Opportunity Zone Preference Points Form HUD-2996. Additionally, in the Chart A2 Supplement you must list the census tract for each of your branches or subgrantees that are located in an Opportunity Zone. You must also provide the total number of Opportunity Zones on the 9906-P for which your branches or subgrantees are located. Do not list census tracts for branches or subgrantees that are not located in Opportunity Zones. For information on Opportunity Zone locations and eligibility, review the Community Development Financial Institutions (CDFI) Fund’s resources, [here](#). Additionally, the CDFI Fund’s mapping tool is available, [here](#).

5.14 How will receiving Opportunity Zone preference points impact my FY21 Comprehensive Housing Counseling (CHC) Grant award?

Answer: In the Opportunity Zone Certification Form (HUD-2996), applicants certify that they will spend a certain percentage of their award in Opportunity Zone tracts. If the applicant is then awarded an FY21 CHC Grant, the Applicant’s proposed budget and subsequent requests for reimbursement must align with the percentage of funds they certified to in the Opportunity Zone Certification Form. For information on Opportunity Zone locations and eligibility, review the Community Development Financial Institutions (CDFI) Fund’s resources, [here](#). Additionally, the CDFI Fund’s mapping tool is available, [here](#).

5.15 FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) Chart A2, Fields P1 and P2 will not let me enter a percentage symbol (%).

Answer: In Chart A2, Fields P1 and P2, enter a whole number between 0 and 100. HUD understands that this represents a percentage. Remember that the combined value of Fields P1 and P2 should sum to 100. Review the grant application instructions downloaded from <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>.

5.16 In the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) Chart A2 Supplement (Excel), Column P states “% of Award Applicant intends to Allocate to its Branches and Subgrantees.” I can complete this section for each of my subgrantees and branches but the main applicant box is grayed out. Please advise.

Answer: Applicants only need to list the sub-allocation for each Subgrantee and Branch. The total of the sub-allocation percentages (Column P) found at the bottom of Chart A2 Supplement (Excel) will be transferred to Chart A2, Field P2 (% of Award Applicant intends to Allocate to its Branches and Subgrantees).

5.17 In the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) Chart B, can I list funding used for assistance with down payments and closing costs?

Answer: No. Applicants can only include funds that are exclusively allocated for the housing counseling program and not passed through to clients for assistance with down payments or closing costs. The leveraged resources in Chart B must be dedicated to running the housing counseling program and result in the provision of counseling and education services. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.18 What is the threshold used to determine the points in a FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) Sub-Factor?

Answer: The Office of Housing Counseling does not disclose the exact scoring rubric for every Rating Factor and Sub-Factor. Applicants should provide concise, accurate answers on the application.

As a reminder, Applicants may request a debriefing under the procedures in the NOFO. In a debriefing, the applicant may present evidence if they believe that an error occurred in the scoring of the application. Contact housing.counseling@hud.gov to schedule a debriefing

5.19 What is the definition of a “Rural” area as used by HUD in the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: Section V.A.1: *Rating Factors* states, under Rating Factor 2(a): *Rural Communities*, that HUD will use internal data sources to determine the extent that an applicant and its network (if applicable), serves a rural area as defined by the USDA at [7 C.F.R. Section 3550.10](#).

5.20 In the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO), which Ratings Factors (RF) are not part of the 9906 charts? Which require a narrative or supplement?

Answer: Applicants with leveraged funds need to complete the Chart B Supplement (Excel). Additionally, all parent agencies must describe their network using the Chart A2 Supplement (Excel). There are no narratives separate from the required 9906 charts. Review the grant application instructions downloaded from <https://www.grants.gov/web/grants/view-opportunity.html?oppld=335689>.

5.21 What is the difference between the Historically Black Colleges and Universities (HBCU) preference points and HBCU and other Minority Serving Institution (MSI) funding initiative in the FY21 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)?

Answer: This year there are two separate items concerning HBCUs. The first one, as described in NOFO Section V.A.2, gives two preference points to an Applicant that partners with an HBCU to help implement their housing counseling programs and services. The application must include documentation evidencing HBCU status such as a Letter of Commitment signed by an authorizing official of the HBCU certifying that a partnership is in place.

Also, there is a new funding initiative included in the FY 2021 NOFO to help HBCUs, Tribal Colleges and Universities, and other MSIs expand their role and effectiveness in addressing and meeting the needs of their local communities. Details about applying for the HBCU/MSI funding initiative are found in NOFO Section V.B.4. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.22 What documentation do I need to submit with my application as proof of a partnership with an HBCU or other MSI for the CHC NOFO HBCU/MSI funding initiative? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: For the FY21 CHC NOFO application, you must submit a letter certifying that an HBCU or other MSI partnership is in effect, or that there is an intent to enter a partnership. This letter must be submitted by the NOFO application deadline. The letter must be signed by the Applicant and the authorized official of the HBCU or other MSI and the Applicant must provide proof HBCU or MSI status.

When executing the grant agreement, the Grantee must submit a Memorandum of Understanding (MOU) or similar agreement signed by all parties. The MOU should clearly provide the partnership's purpose and activities; role and responsibilities for funding of all parties, participation, management and organizational structure, compliance; and integrated data sharing or other reporting capabilities. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.23 How does the funding initiative for HBCUs and other MSIs affect the maximum award amount? (This question is applicable to the FY21 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Applicants who are awarded the funding initiative for HBCUs and other MSIs will receive that funding in addition to the amount they will receive for comprehensive housing counseling. Thus, if the Applicant is awarded the maximum award amount of \$3,000,000 for comprehensive housing counseling, the HBCU/MSI funding initiative would be in addition to that amount, for a total award that may exceed \$3,000,000. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).