

FY 2022 Supplemental Comprehensive Housing Counseling Grant Program NOFO

Frequently Asked Questions

Keywords for entire section: Housing Counseling, Grant, CHC, Comprehensive Housing Counseling, NOFO, NOFA, FY 22, FY 2022, HCA, Funding

Section 1. General

1.1 What are the new items being scored in the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: There are no new Rating Factors in the FY 22 NOFO. For full details on scoring and point allocation, see Section V, *Application Review Information* in the grant application package. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.2 Do I need to inform HUD if our organization has a structural change or merger during the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application process or period of performance? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Yes. Anticipated organizational changes must be reported to your HUD Point of Contact (POC) at least 15 days in advance of the change. 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.3. *Review and Selection Process* in the FY 22 CHC NOFO. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.3 Can applications under the FY 22 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? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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

1.4 Will the Office of Housing Counseling offer a general training on the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is

applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Yes. the Office of Housing Counseling will provide an FY 22 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.5 Does the use of FY 22 Comprehensive Housing Counseling Grant Program (CHC) funds cover all aspects of our housing counseling program? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: FY 22 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 *Funding Restrictions* of the FY 22 CHC Notice of Funding Opportunity (NOFO) and applicable grant agreement. (See [CFR 200.413](#) for additional guidance on direct cost). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.6 How do we know if a cost is eligible under the FY 22 Comprehensive Housing Counseling Grant Program (CHC) grant? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: In creating their budget for approval, grantees receiving funds under the FY 22 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

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 FY 22 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 200.414 and Appendix IV to 2 CFR part 200](#).

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

1.8 Question: What is program income under the FY 22 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 200.307](#). (Program income). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.9 Question: What is the additive method for program income? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

1.10 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\(e\)](#). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.11 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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Yes. Applicants that received approval as a HUD housing counseling agency after September 30, 2021, would not have submitted a form HUD-9902 covering the period October 1, 2020, through September 30, 2021. As such, these newly approved applicants must include a HUD-9902 for the period October 1, 2020, through September 30, 2021, with their FY 22 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 Unique Entity Identifier (UEI). UEIs are issued by Sam.gov at no cost.

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

1.12 Must an Intermediary or Multi-State Organization (MSO) select Subgrantees through a Request for Proposals process for the FY 22 Comprehensive Housing Counseling Grant Program (CHC)

Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 CFR 214](#)) and Office of Management and Budget (OMB) regulations at [2 CFR part 200](#). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.13 Are there FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) reporting requirements for state or local governments that make subawards? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 \$30,000 must be reported in the [Federal Funding Accountability and Transparency Act Subaward Reporting System \(FSRS\)](#). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.14 My organization experienced a change in our Client Management System (CMS) provider during FY 21. 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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application be penalized for manually submitted and untimely reporting? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: The Office of Housing Counseling (OHC) is aware of CMS-related changes that affected participating Housing Counseling Agencies during the 2021 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.*” View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.15 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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application be penalized for untimely reporting? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 FY21. 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.16 The FY 22 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? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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

1.17 How are the grant funds awarded under the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) allocated? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: FY 22 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 FY 22 CHC NOFO for more information. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.18 The FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) instructions list the period of performance as October 1, 2022, through September 30, 2023. Is this a 2-year NOFO? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: The FY 22 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 FY 22 funds and the FY 23 funds are separate awards. Each will have its own HUD-1044 form, grant agreement, and period of performance.

HUD will use the grant applications received for FY 22 and the corresponding scores and funding methodology to make awards for FY 2022, subject to the availability of appropriations. This does not

preclude you from applying to any other NOFOs administered by the Office of Housing Counseling in FY 22. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.19 When determining subaward amounts for the FY 22 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? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Grantees that manage a network of subgrantees and branches should choose the allocation method that best meets their priorities and objectives. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.20 Are successful applicants able to charge the FY 22 Comprehensive Housing Counseling Grant Program (CHC) award for costs incurred prior to the period of performance? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: HUD may allow Applicants to seek reimbursement for costs incurred prior to the Period of Performance but no earlier than April 1, 2022. 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

1.20 How can applicants determine their application score under the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: After awards are made, Applicants may request a debriefing for more information about their final score for each rating factor, final evaluator comments for each rating factor, and the final assessment indicating the basis upon which funding was approved or denied. See Section VI.D, *Debriefing*. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

Section 2. Applicant Eligibility

Approval, Approved, Agency, Certified, Counselors, SHFA

2.1 Who is eligible to apply for FY 22 Comprehensive Housing Counseling (CHC) Grant funding? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: All housing counseling agencies (including LHCA, 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 eligible to apply. Housing counseling agencies that have not received HUD approval but meet the Housing Counseling Program approval criteria at [24 CFR 214.103](#) are encouraged to affiliate with a HUD-approved Intermediary or SHFA. This does not preclude you from applying to any other NOFOs administered by the Office of Housing Counseling in FY 22. For more information, see Section III, *Eligibility Information*, of the FY 22 CHC NOFO. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

2.2 What are the recordkeeping and reporting requirements for FY 22 Comprehensive Housing Counseling (CHC) grant recipients? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: FY 22 CHC grant recipients must submit several reports to the Office of Housing Counseling over the grant period. These reports include grant activity reports and quarterly submissions of the HUD-9902 reports in the Housing Counseling System (HCS). These reports include reporting elements reflecting performance goals, objectives, and accomplishments for the award. See Section III, *Eligibility Information*, and Section VI.C.3, *Award Administration Information/Reporting*, of the NOFO and the FY 22 CHC Grant Agreement. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

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 CFR 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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: No. Housing counseling agencies that have not received HUD approval prior to the FY 22 CHC NOFO issue date but meet the Housing Counseling Program eligibility criteria set forth at [24 CFR 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

2.4 May branches of HUD-approved agencies apply for the NOFO as separate applicants? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: No, Branches are not allowed to apply for the NOFO. Since Branches are legally part of (i.e., not separately incorporated or organized) the Applicant, they are not independently eligible to apply for the NOFO. Per 24 CFR 214.3, a Branch or Branch Office is defined as "[a]n organizational and subordinate unit of a local housing counseling agency, multi-state organization, regional or national intermediary, or state housing finance agency not separately incorporated or organized, that participates in HUD's Housing Counseling program." Therefore, they are covered by the LHCA, MSO, Intermediary, or SHFA's application. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

2.5 Must our agency's housing counselors be HUD-certified for us to receive an FY 22 Comprehensive Housing Counseling (CHC) grant? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Yes. If a grantee has no certified counselors on staff, the agency will be ineligible to receive grant funding or participate in the housing counseling program until this noncompliance is resolved. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

2.6 Our State Housing Financing Agency (SHFA) is not currently participating in HUD's housing counseling program. We would like to apply under the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) as a new applicant. Is our SHFA eligible to apply? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 CFR 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 21 (i.e. October 1, 2020 – September 30, 2021) [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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

2.7 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 FY 21. Will our application be different when applying under the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Yes, for an applicant not listed in Housing Counseling System (HCS) as a parent agency during FY 21, HCS will not have data that reflects their current status as a parent agency. Therefore, such

applicants are required to manually submit an FY 21 (i.e., October 1, 2020 – September 30, 2021) HUD-9902 reflecting their entire network. Applicants that were HUD-approved parent agencies during FY 21 will have their past performance scored on the HCS data that reflects their network during FY 21. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

2.8 We are a HUD-approved Intermediary that did not receive FY 21 Comprehensive Housing Counseling (CHC) funding. We are adding a Subgrantee to our housing counseling agency network for FY 22. As a result, our HUD-9902 data for FY 21 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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: No. For applicants that were a HUD-approved Intermediary in FY 21, 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 21. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

2.9 Can LHCA become direct grantees and be affiliated with a National or Regional Intermediary or State Housing Finance Agency? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: LHCA that become direct grantees may not be affiliated with a National or Regional Intermediary or a State Housing Finance Agency from the time of grant execution until all funds have been expended or recaptured. This does not preclude LHCA from joining or leaving a network between grant cycles. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

Section 3. [Grants.gov/Technical Issues](#)

Additional Keywords: Submit, instructions, grants.gov

3.1 How do we submit the grant application for the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Applicants should review the FY 22 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](#) 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

3.2 Where can I find instructions on downloading the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) grant application from Grants.gov and submitting my application? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: See Section IV, *Application and Submission Information*, of the FY 22 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? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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

3.4 I submitted an application in error on grants.gov. Can I withdraw my application? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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](#). HUD will only review the last application received. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

3.5 I cannot find the *Certification Regarding Lobbying* that is described in the Application Checklist. (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: [Grants.gov](#) has labeled the *Certification Regarding Lobbying* as the *Grants.gov Lobbying Form*. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

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 FY 22 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#). This question is applicable to the FY 22 Housing Counseling CHC Supplemental NOFO only.

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 FY 22 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

4.3 Is the form HUD-2880 Applicant/Recipient Disclosure/Update Report applicable to the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Yes, it is required for entities applying for all HUD funding. See instructions for completing the form HUD-2880, [here \(pages 2-3\)](#). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

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 FY 22 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 \(pages 2-3\)](#). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 FY 22 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 \(pages 2-3\)](#). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

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 FY 22 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. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

Section 5. Application/Charts

Additional Keywords:

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

5.1 Are there narrative sections to the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) application? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Yes. There are narrative sections included in the HUD-9906 Charts and not in a separate document or other attachment. Applicants should complete any narratives in the appropriate HUD-9906 charts and comport with the posted character limits.

See Section IV, *Application and Submission Information*, of the FY 22 NOFO for details. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.2 Are the FY 22 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)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: No, there are different NOFO application packages. The application for LHCAs includes Form 9906-L and the 9906 Chart B Supplement. The application for MSOs, Intermediaries, and SHFAs includes Form 9906-P, the 9906 Chart A2 Supplement (required), and the 9906 Chart B Supplement. See Section IV.B.2, *Application and Submission Information, Content and Form of Application Submission*, 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 FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Applicants may earn up to 2 points for “Emergency Preparedness/Disaster Recovery” as part of Rating Factor 2: Need/NOFO Priorities. See Section V.A., *Application Review Information, Review Criteria*. 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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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)
- Form HUD-424-B, Applicant Assurances and Certifications

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

5.5 What are the requirements for claiming the Promise Zone bonus points in the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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: promisezone@hud.gov. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

5.6 On the FY 22 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 21 but will not be seeking funds from the FY 22 Comprehensive Housing Counseling NOFO? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Review Section V.A, *Application Review Information, Review Criteria* of the FY 22 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 22 Comprehensive Housing Counseling NOFO. Accordingly, information on past subgrantees and/or branches to which funds will not be subgranted under the FY 22 NOFO should not be included. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

5.7 What are the scored items not covered in the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) HUD-9906 Charts? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) be able to make changes to their subgrantee list? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 The FY 22 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 (%).(This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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

5.10 In the FY 22 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. (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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

5.11 In the FY 22 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? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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](#).

5.12 What is the threshold used to determine the points in a FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) Sub-Factor? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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

5.13 What is the definition of a “Rural” area as used by HUD in the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 CFR Section 3550.10](#). View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

5.14 In the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO), which Ratings Factors are not part of the HUD-9906 charts? Which require a narrative or supplement? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

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 HUD-9906 charts. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

5.15 What is the difference between the Minority Serving Institutions (MSI) preference points and HBCU and Other Minority Serving Institution (MSI) Funding Initiative in the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: This year there are two separate items concerning Minority Serving Institutions. The first one, as described in NOFO Section V.A.2, *Application Review Information, Review Criteria, Other Factors*, gives two preference points to an Applicant if they are an Applicant designated as an MSI or if their application proposes one or more partnerships with minority-serving educational institutions that have been historically underserved.

Also, there is a funding initiative included in the FY 2022 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., *Application Review Information, Review and Selection Process, Historically Black Colleges and Universities, Tribal Colleges and Universities, and other Minority Serving Institutions*. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.16 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 FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: For the FY 22 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](#).

5.17 How does the funding initiative for HBCUs and other MSIs affect the maximum award amount? (This question is applicable to the FY 22 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](#).

5.24: Our organization is an HBCU/MSI and would like to pair with more than one housing counseling agency under the HBCU/MSI funding initiative. May we partner with more than one housing counseling agency to apply for the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) and receive HBCU/MSI funding? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: No. Applicants and Subgrantees are prohibited from applying for or receiving FY 22 CHC Program grant funding from multiple sources. Therefore, an HBCU or MSI may only partner with one Applicant and receive CHC funding from that one Housing Counseling Agency. View the NOFO at the HUD office of [Housing Counseling HUD Exchange page](#).

5.25 Where can I find a list of HBCUs and MSIs for the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO)? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: Historically Black Colleges and Universities (HBCUs) and other Minority-Serving Institutions (MSIs) are designated by the [Department of Education](#). Additionally, please see the published [resource](#) on HUD Exchange. View the NOFO at the HUD Office of [Housing Counseling HUD Exchange page](#).

5.26 Chart A, Field F of the FY 22 Comprehensive Housing Counseling Grant Program (CHC) Notice of Funding Opportunity (NOFO) asks for the number of Housing Counselor Full-Time Equivalents (FTEs) as of September 30, 2020. Must these FTEs be HUD-certified? (This question is applicable to the FY 22 Comprehensive Housing Counseling (CHC) Notice of Funding Opportunity (NOFO) only.)

Answer: The instructions for Field F do not distinguish between HUD-certified and non-HUD certified housing counselors. Applicants should include all Housing Counselor Full-Time Equivalents that provided housing counseling services prior to September 30, 2020. Regardless of the number of Housing Counselor Full-Time Equivalents employed by a housing counseling agency, Fiscal Year 2022 NOFO grant funds can be used to cover the costs of housing counseling in connection with a HUD program only if the housing counseling is provided by HUD-certified counselors. HUD-certified Housing Counselor status is captured in Chart A, Field J, *Agencies have counselors on staff who have passed the HUD Housing Counseling Certification Exam*.

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