

Fiscal Year (FY) 2022 Family Unification Program (FUP) Notice of Funding Opportunity (NOFO) Frequently Asked Questions

HUD is providing the questions and answers below as an aid to potential applicants under the FY 2022 FUP NOFO. Questions submitted to 2022FUPNOFO@hud.gov will be answered in this document. This document will be updated periodically and reposted with the date it was updated.

May 24, 2023 - Updated

Contents

1. NOFO Preview Period.....	1
2. General NOFO Requirements.....	2
3. Eligibility	4
4. Memorandum of Understanding (MOU).....	5
5. Rating Factors and Rating Factor Certification.....	8
6. Form HUD-52515	10
7. Other	10

1. NOFO Preview Period—**The NOFO preview period is closed. The NOFO was published on Grants.gov on April 25, 2023 with an application deadline of May 25, 2023.**

1.1 Question: Where can I access the NOFO during the preview period?

Answer: During the preview period, the NOFO will be available on HUD’s website at <https://www.hud.gov/grants>. The NOFO preview will be available at the link for the “Family Unification Program (FUP) (FR-6600-N-84).”

1.2 Question: Is HUD accepting applications during the preview period?

Answer: HUD is not accepting applications during the preview period. HUD will begin accepting applications once the NOFO is published on Grants.gov. HUD expects to publish the NOFO on Grants.gov around March 2023. The application period will be open for 30 days.

1.3 Question: Can I work on the MOU and Rating Factor Certification during the preview period?

Answer: HUD strongly encourages interested applicants to begin working on their applications during the preview period, including the MOU and the Rating Factor Certification.

1.4 Question: Can the MOU be executed during the preview period?

Answer: No. The NOFO requires that the MOU be signed between the date the NOFO is published and the application deadline. The NOFO is considered “published” once it has been published on Grants.gov. Therefore, **the MOU must be signed between the date the NOFO is published on Grants.gov and the application deadline.**

1.5 Question: Can I submit questions on the NOFO during the preview period?

Answer: Yes. During the preview period, interested applicants may submit questions on the NOFO preview to the following email address: 2022FUPNOFO@hud.gov. HUD’s responses to questions received through this email box will be posted in an FY 2022 FUP NOFO FAQs document located on [HUD’s FUP web page](#). HUD will be responding to questions during both the preview period and the application period.

1.6 Question: Can I submit a request for a waiver of electronic submission requirements during the preview period?

Answer: No. HUD will not accept requests for a waiver of electronic submission requirements during the preview period. Such requests may only be submitted once the NOFO has been published on Grants.gov.

1.7 Question: For Rating Factor 3, Previous Coordination, can an applicant receive points if the PHA and/or PCWA’s agreement with a local CoC to receive referrals from the local coordinated entry system was established during the preview period?

Answer: No. The PHA and/or PCWA’s agreement with a local CoC to receive referrals from the local coordinated entry system must have been established **prior** to the opening of the preview period.

1.8 Question: How will I know when the preview period has closed and the NOFO has been published on Grants.gov?

Answer: Once the NOFO has been published on Grants.gov, HUD will update <https://www.hud.gov/grants> so that the NOFO is listed under “2022 NOFOs” and is no longer listed under “Forecast for *Remaining* Fiscal Year 2022 Funding Opportunities.” HUD will also send an email announcement to PHA Executive Directors announcing the publication of the NOFO on Grants.gov.

2. General NOFO Requirements

2.1 Question: Does the NOFO require matching funds?

Answer: The NOFO does not require matching funds.

2.2 Question: Do we need to include the estimated funding amounts for the services that will be provided to FUP participants by the PCWA and CoC?

Answer: The NOFO does not require the estimated funding amounts for services to be provided.

2.3 Question: Is the SF-LLL required? We don't have any lobbying activities to disclose. However, the **(New)** Grants.gov workspace says that the form is mandatory. How should we proceed?

Answer: The SF-LLL is a required form. If the form is not applicable to your agency, enter Not Applicable in all required fields of the form and submit.

2.4 Question: On Form 2880, should we reply "Yes" to Question 1 of the Threshold Determinations **(New)** (confirming that we are applying for a specific project or activity) and "No" to Question 2 (confirming that we haven't or don't expect to receive assistance within the jurisdiction of HUD, involving the project or activity in the application, in excess of \$200,000 during this fiscal year)? We already administer FUP vouchers, so I'm unsure whether we should disclose the HAP and Admin Fee funding for those vouchers, or whether that's considered a different activity since they were awarded under different NOFOs.

Answer: Applicants will answer yes to Part I Question 1. The response to Part I Question 2 will be determined by the amount of assistance being requested under this NOFO. If you answer "No" you do not need to complete the remainder of the form. However, the applicant must sign the certification at the end of the report. If you answer yes to both, you will need to complete Part II and Part III.

2.5 Question: Does the staff person who will be submitting the grant application need to be approved **(New)** by the E-Biz POC for submission or can the E-Biz POC manually approve it?

Answer: The NOFO states that anyone planning to submit applications on behalf of an organization must register at grants.gov and be approved by the E-Biz POC in SAM to submit applications for the organization.

2.6 Question: In the HUD form 2880, should we state "FY 2022 Family Unification Program Notice of **(New)** Funding Opportunity" for the HUD Program Name?

Answer: This response would be sufficient.

2.7 Question: In Part II of the HUD form 2880, should we state "Grant Assistance" for the Type of **(New)** Assistance and "Rental Assistance" for the Expected Uses of the Funds?

Answer: These responses would be sufficient.

2.8 Question: In the HUD form 2880, is the report type "initial?" **(New)**

Answer: 'Update' should be used when the applicant has previously completed this form and received HUD assistance. Otherwise, applicants should choose 'initial.'

2.9 Question: In the HUD form 2880, if the type of report is "Initial," do I need to complete Part III? **(New)**

Answer: Yes.

2.10 Question: We are a public housing agency seated within a local government structure, and we're unsure whether we should list ourselves as Public/Indian Housing Authority (even though we are an agency, not an authority) or County Government on the SF-424 Application for Federal Assistance. Do we have to identify as a PHA in order to be eligible for this NOFO? We understand that county governments are not eligible for this NOFO, but we want to make sure we are listing our PHA correctly.

Answer: The NOFO requires that the PHA code be included under field 5a, Federal Entity Identifier in the SF-424 Application for Federal Assistance. This will be used to identify the applicant as a PHA. The applicant may select the "Type of Applicant" that best reflects their organization.

3. Eligibility

3.1 Question: If my PHA already administers the FUP, are we eligible to apply under this NOFO for new incremental FUP vouchers?

Answer: PHAs that already administer the FUP are eligible to apply under this new NOFO opportunity.

3.2 Question: Are PHAs that do not currently administer the FUP eligible to apply?

Answer: PHAs do not have to previously have experience administering the FUP in order to apply under this NOFO.

3.3 Question: Can families apply for housing assistance through this NOFO?

Answer: No. Families interested in the FUP should reach out to their PCWA, PHA, or CoC, to determine availability of the program in their community. The funds made available through this NOFO are provided only to PHAs to administer the program. HUD does not administer the assistance directly to families.

3.4 Question: My PHA only administers the Public Housing program. Are we eligible to apply for this NOFO?

Answer: Only PHAs that have an existing ACC with HUD for HCVs are eligible to apply for funding under this announcement.

3.5 Question: We are a PHA/non-profit agency that administers Mainstream vouchers only. Are we eligible to administer the FUP?

Answer: Per the NOFO, only PHAs that have an existing ACC with HUD for HCVs are eligible to apply for funding under this announcement. This excludes non-profits that administered Mainstream prior to its conversion to section 8(o) under the Frank Melville Supportive Housing Investment Act of 2010 and was classified as a PHA only for purposes of administering the Mainstream program.

3.6 Question: My PHA applied for and received vouchers under the Foster Youth to Independence (FYI) initiative. Are we eligible to apply for assistance under this NOFO?

Answer: Administering FYI vouchers does not preclude eligibility under this NOFO.

3.7 Question: Is administering a Family Self-Sufficiency (FSS) program an eligibility requirement?

Answer: Administration of an FSS program is not a requirement of the NOFO. Applicants may receive up to 16 Rating Factor points for meeting the Rating Factor 6 Self-Sufficiency Programs section of the NOFO.

3.8 Question: My PHA has a FUP utilization of 85 percent. Are we eligible to apply under the NOFO?

Answer: For PHAs presently administering FUP vouchers, the following eligibility threshold to receive additional vouchers applies: a. FUP utilization rate of 90 percent or greater; or b. Absent a utilization rate of 90 percent or greater, the adoption of an action plan to achieve full utilization within 12 months from date of application to this NOFO. See Section III.F. of the NOFO for additional information.

3.9 Question: Is a Tribally Designated Housing Entity (TDHE) is eligible for this funding opportunity?
(New)

Answer: No, Tribally Designated Housing Entities are not eligible for FUP.

4. Memorandum of Understanding (MOU)

4.1 Question: Would a PHA need to submit two MOUs if applying to serve both FUP families and FUP youth?

Answer: Only one MOU will be accepted per applicant. An MOU being submitted under this NOFO must meet all requirements as described in the NOFO. This includes how both FUP-eligible families and FUP-eligible youth will be served.

4.2 Question: For our application, the PHA and PCWA intend to enter into agreements with multiple Continuums of Care (CoCs) that fall within the PHA's jurisdiction. Are we allowed to send a separate MOU for each CoC we enter into agreement with, or do we have to require that all CoCs we are partnering with be on the same MOU?

Answer: Only one MOU will be accepted per applicant. An application that includes more than one MOU will fail the threshold review and will not be considered for further review.

4.3 Question: Where there are multiple CoCs, can each CoC sign the MOU?

Answer: Yes, PHAs are not limited in the number of partners that may sign the MOU.

4.4 Question: Is the MOU limited to the PHA, PCWA, and CoC, or may other partners sign the MOU?

Answer: The MOU is not limited to the PHA, PCWA, and CoC. The MOU may include other community partners.

4.5 Question: If the relevant PCWA has chosen to enter into an MOU with a statewide housing agency for the purposes of responding to this NOFO, and has indicated a lack of interest in separately collaborating with additional local PHAs, is there an avenue for a local PHA to separately compete for funding with an understanding of cooperation with the statewide agency and PCWA?

Answer: The local PHA will need to have an MOU with the PCWA that will be providing the referrals and other PCWA responsibilities indicated in that single MOU.

4.6 Question: Is the PHA applicant allowed to be the provider of supportive services to FUP-eligible youth rather than the PCWA?

Answer: The PHA or another agency/organization may be the provider of the required supportive services to FUP-eligible youth. The organization providing the services and resources must be identified in the MOU.

4.7 Question: The rating factor certification for Rating Factors 1, 2, 4, and 5 asks if the MOU specifies the agency/organization that will provide the supportive service. Does the MOU need to identify the specific agency/organization to be eligible for full points under those rating factors? If we, or our system partners, commit to funding the activities in those rating factors, do we need to also identify the specific agency/organization that will be contracted to provide the service? In some cases, it may make sense to wait until we know the scale of the FUP award to determine the specific agency/organization that will deliver the services. If we include a specific commitment in the MOU to fund the activities for all FUP families and youth, is that sufficient to receive full points for these rating factors?

Answer: NOFO reviewers will verify that the MOU specifies the specific agency/organization that will provide the supportive service. HUD is reviewing the NOFO to determine who, if the applicant is awarded funding under the NOFO, has been identified to provide the services.

4.8 Question: The sample Memorandum of Understanding included in the NOFO outlines PHA, PCWA, and CoC responsibilities. Can you provide an example of how, for instance, the PHA responsibilities should be addressed?

Answer: The sample MOU demonstrates the requirements listed in Section III.F.5. of the NOFO. Additional specificity is provided at the applicant's discretion. For example, under PHA Responsibilities, the text may read, "[Insert PHA Name] commits to the following activities." The MOU would then include items 1 – 9. This would meet the threshold requirement.

4.9 Question: Are all community partners required to be listed in the Introduction and Goals section of the MOU?

Answer: For the Introduction and Goals section, the PHA, PCWA, and CoC must be included. The inclusion of additional entities in this section is at the discretion of the applicant.

4.10 Question: The MOU must be approved by our Board of Supervisors and we will not have enough time to prepare the MOU and have this approval prior to the application due date. As such, we are asking if an unsigned draft can be included along with our currently active MOU in place for the FUP program, or perhaps letters of intent instead of the new MOU?

Answer: The application must include an MOU executed by the official representative of the 1) PHA, 2) PCWA, and 3) CoC. The MOU must have been executed **between the date this NOFO was published on Grants.gov and the application deadline date (i.e., between April 25, 2023 and May 25, 2023)**. This is a threshold requirement. Applicants who fail to meet a threshold eligibility requirement will be deemed ineligible. Applications from ineligible applicants will not be evaluated. No exceptions or extensions to this requirement are allowed.

4.11 Question: In regard to the FY 2022 Family Unification Program (FUP) NOFO (FR-6600-N-84) preview, if a public housing agency (PHA) has an existing Memorandum of Understanding (MOU) with a Public Child Welfare Agency (PCWA) and Continuum of Care (CoC) for the administration of previously awarded FUP vouchers, does the PHA need to execute an *entirely new* MOU with the PCWA and CoC or would an *amendment (or other type of update)* to the existing MOU that addresses the specific, differing requirements for any vouchers awarded under FR-6600-N-84 be sufficient and acceptable?

Answer: The FY 2022 FUP NOFO preview does not require that a PHA and its partnering PCWA and CoC execute an entirely new MOU for the purpose of applying for funding under the NOFO. Therefore, applicants may submit a new or amended MOU as long as the MOU meets the requirements of Section III.F.5 of the NOFO and the execution date is between the date the NOFO is published on Grants.gov and the application deadline date under the NOFO (i.e., between April 25, 2023 and May 25, 2023).

4.12 Question: The NOFO states that the MOU must be executed between the date the 2022 Family Unification Program Notice of Funding Opportunity is published and the application deadline date. What are the applicable dates for this requirement?

Answer: The NOFO was published on Grants.gov on April 25, 2023 with an application deadline date of May 25, 2023. Therefore, the MOU must be executed during this timeframe.

4.13 Question: Can a PHA submit letters of support from community partners as part of its NOFO application?

Answer: The NOFO requires a Memorandum of Understanding (MOU) between the public housing agency (PHA), public child welfare agency (PCWA), and continuum of care (CoC) that meets the requirements contained in the NOFO. For other special purpose vouchers, like HUD-VASH and Stability Vouchers (SVs), the registration of interest process for PHAs did require letters of support from their local partnering organizations

(e.g., the VA Medical Center for HUD-VASH and CoC or Victim Service Provider for SVs). However, for FUP vouchers, the MOU is the required partnership agreement and general letters of support will not be accepted.

- 4.14 **Question:** One of the agency partners has asked to enter a separate MOU under the FUP application with us directly. This agency will provide services to the families under FUP. Is this an allowable practice or does there need to be one MOU?

Answer: There must be a single MOU between the PHA, PCWA, and CoC. Other organizations that are providing services to FUP participants must be referenced in the MOU for the purpose of meeting the requirements of the NOFO and/or earning points under the Rating Factors, but do not need to be a party to the MOU. The PHA may enter into a separate MOU with these entities.

- 4.15 **Question:** Our PHA has an existing MOU that expires in 2025. Can we do a certification letter that we are working on an amendment to our MOU to include the statement that we will comply with the time limit for FUP vouchers issued to youth, including requirements of the Fostering Stable Housing Opportunities (FSHO) amendments? We are complying with this requirement but have not had any youth be eligible for FSHO yet. We need several months to make a change to a MOU in our county and could not make this change within the release of the NOFO and the deadline. We have all the other requirements in our MOU.

Answer: In order to be eligible under this NOFO, the applicant must submit an MOU that contains all of the requirements in Section III. F.5 of the NOFO, including a statement that the PHA will comply with the time limit for FUP vouchers issued to youth and any extensions of this time limit that the youth is entitled to under the FSHO amendments. The MOU must be executed between the publication of this NOFO and the application deadline under the NOFO (i.e., between April 25, 2023 and May 25, 2023). HUD is unable to accept a certification that an MOU will be updated to meet the requirements of the NOFO.

5. Rating Factors and Rating Factor Certification

- 5.1 **Question:** Can the required Rating Factor Certification be incorporated into the Memorandum of Understanding (MOU), or does the Rating Factor Certification have to be a separate document?

Answer: No. The Rating Factor Certification and MOU must be separate documents.

- 5.2 **Question:** Is the Rating Factor Certification available for download?

Answer: The Rating Factor Certification is provided in the Appendix of the NOFO. You may copy the content and paste it in a program such as Microsoft Word.

- 5.3 **Question:** Can HUD confirm that earning Rating Factor 5 points requires case management services only for FUP-Eligible Families, and that case management services to FUP-Eligible Youth are not required to earn Rating Factor 5 points?

Answer: Rating Factor 5 is specific to FUP families only.

- 5.4 Question: In Rating Factor 3, Question 2, it asks if the PHA and/or PCWA and the local CoC established an agreement to receive referrals from the local coordinated entry system prior to the publication of the Federal Register Notice announcing the publication of a preview of this NOFO. What date was the Federal Register Notice published?

Answer: The Federal Register Notice announcing the publication of a preview of this NOFO was published on December 15, 2022. Therefore, in order to receive points for Rating Factor 3, the established agreement between the PHA and/or PCWA and the local CoC must have been established before December 15, 2022.

- 5.5 Question: We have a question regarding Rating Factor 6. Self-Sufficiency Programs. Our PHA is seated within a Department of Social Services (DSS) that has a very robust self-sufficiency program. While our agency does not administer the program, directly, we are part of the organization that does. To that end, we can very much commit to meeting the goals of the rating factor. The self-sufficiency program meets the identified goals of increasing earned income and financial literacy, reducing or eliminating the need for welfare assistance, and making progress towards economic independence and self-sufficiency.

Can the capability to engage with a DSS administered self-sufficiency program count towards the rating factor as it is a “similar program promoting self-sufficiency?”

Answer: Your PHA should answer the rating factor questions to the best of your ability and provide additional support explaining your specific situation or alternate self-sufficiency program(s). Your responses and application will be reviewed in alignment with the rating criteria upon submission.

- 5.6 Question: For the Rating Factor Certification, it doesn't look like there is an actual form, but the **(New)** Rating Factor questions can be copied and pasted into a word document and attached. Is the signature simply a signature line and date added to the bottom of the word document?

Answer: Yes, the Rating Factor Certification can be copied and pasted into a Word document and the signature and date can be added at the end of the document.

- 5.7 Question: For Rating Factor 3, Previous Coordination, can the established agreement be a **(New)** previously executed MOU for the Emergency Housing Voucher Program between us (PHA) and CoC? If yes, do we simply include that MOU as an attachment?

Answer: The established agreement can be for another program, such as the Emergency Housing Voucher program. This should be indicated in the Rating Factor Certification and the existing MOU should be uploaded as an attachment.

- 5.8 Question: The NOFO states that the Rating Factor Certification must be signed by the Executive **(New)** Director, Chief Executive Officer, or individual of equivalent position of the PHA. Can I

sign as the Deputy CEO?

Answer: The Rating Factor Certification must be signed by the individual required in the NOFO. HUD is unable to change this requirement.

6. Form HUD-52515

6.1 Question: Should the form HUD-52515 be uploaded as an attachment? Would the same file name guidelines used for other attachments also apply?

Answer: The Funding Application (form HUD-52515) is required and must be submitted as an attachment. The form should be labeled using the following structure [PHA Code_HUD-52515_2022FUPNOFO].

6.2 Question: Regarding the Form HUD-52515, Field F – Need/Extent of the Problem, is there a specific 12-month period that is required (e.g., Federal Fiscal Year, 12-months from now) for the data to be pulled for each category?

Answer: The NOFO does not define the 12-month period. Applicants have discretion in how they present the data. For example, Federal Fiscal Year, 12-month period from application, or Calendar Year 2023, would be acceptable.

6.3 Question: The NOFO says to use the most current version of the HUD-52515 form which has an expiration date of April 30, 2026. Where can I locate this form?

Answer: The form is available at the following link:
<https://www.hud.gov/sites/dfiles/OCHCO/documents/52515.pdf>

6.4 Question: Is it OK for me to use my Adobe Pro software to insert the questions listed on page 25 of the NOFO into the 52515 along with our answers?

Answer: Yes, it is fine to use your software to insert this information into the form.

7. Other

7.1 Question: Where can an applicant find more information about general FUP program operation and voucher administration requirements (e.g., waitlist administration, project-basing FUP vouchers, changing service providers, etc.)?

Answer: More information is available on HUD's FUP webpage:
https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family

7.2 Question: Please explain what a CoC is.

Answer: A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The Continuum of Care (CoC) Program is designed to promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and

local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. Please visit the following website to learn more about the Continuum of Care Program:
<https://www.hudexchange.info/programs/coc/>.

7.3 Question: Can you tell me if specific PHAs have applied for the NOFO?

Answer: HUD is not able to provide this information.

7.4 Question: What types of activities should be included an action plan to reach full utilization of existing FUP vouchers? We are aware that we are not required to submit the Action Plan, but would like to ensure that what we develop meets HUD's expectations.

Answer: The examples of eligible activities/expenses included in [Notice PIH 2022-14](#) are the types of activities that could be included in the Action Plan. The notice included the following examples:

- Establishing a new/revised Memorandum of Understanding (MOU) with the PCWA and other partners;
- Working with community partners to establish and implement a system to identify eligible youth not currently within the PCWA's caseload in cooperation with the Continuum of Care (CoC), including integrating the prioritization and referral process for eligible youth not currently in the PWCA's system into the local CoC's coordinated entry process;
- Hiring temporary staff to process RFTA forms;
- Hiring temporary staff to conduct HQS inspections or pre-inspect units that FUP/FYI clients are likely to rent;
- Hiring temporary staff to provide FUP/FYI clients with housing search assistance;
- Hosting a "FUP/FYI Day," a one-stop resource for intake, issuing provisional vouchers, etc.;
- Hosting Landlord Recruitment Fairs and other activities to engage landlords to participate in FUP/FYI;
- Holding extra briefings for FUP/FYI clients;
- Other services to ensure that FUP/FYI clients can move into their new homes with a voucher in the shortest time period possible; and
- Training PCWA, CoC, and other community partners on FUP/FYI and the HCV Program.

Further, [Notice PIH 2022-18](#) permits PHAs to use their administrative fees for security deposit assistance, landlord incentive and retention payments, and other activities to help families lease a unit with their voucher. This flexibility to use administrative fees to help families lease a unit applies to all of the Department's HCV programs, including FYI and FUP. These activities could also be included in an Action Plan to increase FUP utilization.