Housing Related Hazards Capital Fund (HRHCF) Notice of Funding Opportunity (NOFO)

Frequently Asked Questions

Applications due May 25, 2021

Contents

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Asked Questions (FAQs)

How to Apply

1. Where can I find the published Notice of Funding Opportunity (NOFO)?

The published NOFO is available at:

https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps/fy20_housingrelated_hazardcapitalfund

You may also search for the NOFO on Grants.gov: https://www.grants.gov/web/grants/search-grants.html?keywords=Housing%20related%20hazards%20capital%20fund

2. What is the maximum award to a public housing agency (PHA) for this grant?

A Public Housing Agency (PHA) may receive a maximum award of $4 million.

3. Is there a minimum amount for the grant?

$10,000 is the minimum amount that may be awarded.

4. How many applications can a PHA submit?

One. A PHA may submit only one application but the request may be for more than one project (i.e., more than one development in the Inventory Management System/Public and Indian Housing Information Center (IMS/PIC)) and more than one hazard.

5. Where can PHAs find the forms that applicants must submit to apply for a HRHCF grant?

The required forms for the application package can be found at:

https://www.grants.gov/web/grants/view-opportunity.html?oppId=332342

6. Does the application download include Form HUD-50075.1 Parts I and II?

The HUD form can be created in HUD's Energy and Performance Information Center (EPIC)and found by visiting the Forms Library in HUD's Client Information Policy System (HUDCLIPS) at https://www.hud.gov/hudclips. If using EPIC, you can print to PDF and upload a copy. Use of EPIC will save a step if awarded, as the Annual Statement/Budget must be submitted via the system. Only authorized PHA staff have access to EPIC.

7. Will the application require an additional narrative to the form HUD-50075.1, Annual Statement/Performance and Evaluation Report?

A Narrative of up to 5 pages double spaced should be submitted to describe Rating Factor 2: Need. Narratives may also be submitted for Rating Factor 5: Other Factors: Section 3, Opportunity Zones, Historically Black Colleges or Universities (HBCUs), and/or Promise Zones (if applicable) and shall not exceed 2 (two) pages, double-spaced 12 point font. The description of the planned work should only be included in the submitted form HUD-50075.1.

8. Can you go into more detail about how to use EPIC when applying?

Form HUD-50075.1 Parts I and II Annual Statement/Performance and Evaluation Report, Capital Fund Program must be completed as part of the application. This form may be prepared in HUD's Energy and Performance Information Center (EPIC) by authorized PHA users, printed or saved to PDF and included in the application. It should be noted though that EPIC will only allow PHAs to add work activities from an approved 5 Year Action Plan to be included on the Form HUD-50075.1 Parts I and II Annual Statement/ Performance and Evaluation Report.

If the activities to be completed under the proposed HRHCF grant are not currently in an approved 5 Year Action Plan in EPIC, the PHA will either have to revise its 5 Year Action Plan in EPIC to include the activities and get the Plan approved or alternatively use the Form HUD50075.1 from HUDCLIPS. After award, PHAs may need to update their submissions in EPIC and will need approval from HUD before work can commence.

9. As an outside Consultant, am I allowed to access EPIC to complete the 50075.1 for a PHA within the system. If so, does the PHA provide me with a user name and password, or do I get that from HUD?

PHAs are responsible for deciding who should have access on behalf of the PHA.

PHA are responsible for their information in EPIC and for the accuracy of the information submitted in EPIC. A PHA may request that EPIC access be granted to staff members or consultants working on their behalf.

Obtaining EPIC access is a multi-step process that also requires a HUD Secure Systems account. Instructions for obtaining access are available at: https://portalapps.hud.gov/app_epic/. HUD cannot guarantee that new access will be completed before the NOFO deadline. PHAs should note that the application deadline will not be extended based on an inability to timely obtain EPIC access for a staff member or consultant. PHAs may create their 50075.1 on paper in lieu of creating this document in EPIC.

10. Is a PHA under a federal monitorship still eligible for this grant?

Yes. PHAs that are under federal monitorship are eligible, and this NOFO does not include a restriction for use of funds under receivership or the oversight of a federal monitor. PHAs that are designated as Troubled are eligible for funding if the agency is in compliance with any current Memorandum of Agreement or Recovery Agreement.

11. Can a PHA that only administers Section 8 Housing Choice Vouchers (HCV), Project Based Rental Assistance (PBRA), or Project Based Vouchers (PBV) apply for funds under this NOFO?

No. The funds under this NOFO are designated for evaluating and reducing housing related hazards in public housing (i.e. units assisted pursuant to Section 9 of the United States Housing Act of 1937) only.

12. Can individuals, nonprofits, resident associations, tribes or tribally designated housing entities apply for this grant?

No. Only PHAs are eligible. See section III.A. Eligible Applicants of the NOFO.

13. Are developments that have converted under the Rental Assistance Demonstration (RAD) eligible for this grant?

No. Properties that have been converted under RAD are no longer considered public housing, as they have converted to the project-based voucher (PBV) or project-based rental assistance (PBRA) program.

14. Is a PHA still eligible to receive a grant award for a building that is under a Commitment to enter into a Housing Assistance Payment (CHAP) since the time of submission?

No. Funds cannot be used for projects with active CHAPs. If an applicant is awarded grant funds and also has an active CHAP, the applicant will be required to withdraw the CHAP or refuse the grant award. Applicants that are awarded may be required to periodically certify to HUD that funded work is not occurring in an IMS/PIC development subject to a Commitment to enter into Housing Assistance Payments Contracts (CHAP). For compliance with this provision, HUD will assume all units in the property with a CHAP are included, even if the CHAP has phases where certain units are not covered.

15. The guidance says that funds may not be used at projects under CHAPs. Is it possible to make an application for a development that we intend to place under a CHAP in the future - as long as the work is completed before the CHAPs are in place?

It is allowable to use these funds on public housing properties that are not yet under a CHAP. The intent of this NOFO, however, is to provide funds for housing-related hazard evaluation and hazard control in public housing managed by public housing authorities. Applicants that are awarded may be required to periodically certify to HUD that funded work is not occurring in an IMS/PIC development subject to a Commitment to enter into Housing Assistance Payments Contracts (CHAP). For compliance with this provision, HUD will assume all units in the property with a CHAP are included, even if the CHAP has phases where certain units are not covered.

16. Can funds be used for work at multiple properties?

Yes. Funds can be used for work at multiple properties. Each property should be identified in Part II of form HUD-50075.1. All projects must meet the eligibility requirements in accordance with the NOFO., and all submitted forms must include the IMS/PIC Development(s)/AMP (s) name and number.

17. Does form HUD- 2880, Applicant/Recipient Disclosure/Update Report, need to identify all projects where grant funds will be used?

PHAs should use Part II of form HUD-50075.1 to identify all projects where grant funds will be used. This form includes separate columns that will capture each project (i.e., IMS/PIC development) number and name and work to be performed at each project.

18. Can a PHA submit an application that includes requests for funding for inspections that have already started?

No. A PHA may not apply for a HRHCF grant to reimburse themselves for work already performed.

19. If a PHA proposes activities with costs exceeding the maximum grant amount of $4 million but will use other funds to make up the difference between the maximum grant amount and the total cost, how should this be recorded on form SF-424?

In this case, the applicant should list $4 million on line 18a of the SF-424, and any other funds on lines 18b-18f.

20. We would like to request the maximum amount of $4,000,000. Would HUD approve a lesser amount if funds are not available or should we submit a lower amount?

As stated in Part V of the NOFO, Application Review Information, applications will be ranked in order of total score and funded in order of rank, subject to funding availability. Under the NOFO, HUD reserved the right to only partially fund applications based on the selection information above. For example, the last applicant to be funded based on the ranking may receive only a portion of the requested amount, based on remaining funds available.

21. Can you attach photos to demonstrate your mold problem with the Rating Factor 2 or would that count against the 5-page narrative limit?

Photos can be attached, but they will count against the 5-page narrative limit.

22. Are there any fair housing forms to be submitted with the application?

The required forms are identified in the NOFO package at:

https://www.grants.gov/web/grants/view-opportunity.html?oppId=332342

23. Will receiving a Housing-Related Hazards Capital Fund grant impact a PHA's eligibility to receive an Emergency Grant?

No. If a PHA is awarded a grant under this program, it will not impact eligibility for Capital Fund Emergency grants.

Eligible Activities

24. What are the eligible activities under this NOFO?

This program provides competitive grants to PHAs to evaluate and reduce housing- related hazards in public housing. All Capital Fund work items that are eligible under BLI 1480 are eligible activities under this NOFO as long as the PHA can tie the work items to the hazard for which it is requesting funding.

25. Can Housing Related Hazard Capital Fund grants be used to cover relocation costs?

Yes, if it is directly related to the hazard work being performed with the funding. Temporary relocation may not be necessary, if the work can be sealed and the family has access to a restroom and kitchen in the evening. Applicants should consider the scope and duration of the work and whether the expenses for temporary relocation are necessary. If lead-based paint will be disturbed, follow Chapter 8 of the HUD Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing.

26. Can Housing Related Hazard Capital Fund Program grants be used to purchase equipment?

HRHCF grant funds can be used to purchase equipment but cannot be used for additional ongoing costs such as user training, periodic state or EPA certifications, or registration of the nuclear source (if applicable). Those additional ongoing expenses must be paid for with Operating Funds or another eligible source.

27. Will a small PHA be able to be competitive with this grant? Does it pay for a small PHA to go through the application process?

Yes, application scores are based on Rating Factors 1, 2, 3, 4, and 5 which do not account for the size of the PHA.

28. How can I complete the 50075.1 in EPIC and then include it in my NOFO application submission?

PHAs wishing to create their Annual Statement/Budget (50075.1) in EPIC would first create a 5-Year Action Plan in EPIC including the housing related hazard activities they are proposing or revise their EPIC 5-Year Action Plan to include these activities and then obtain Field Office approval of the plan. Once the plan has received Field Office approval in EPIC, the PHA would create an Annual Statement/Budget in EPIC that includes the grant activities. The EPIC system will automatically enforce a 1,000-character limit.

After creating the Annual Statement/Budget in EPIC, the PHA would then export a PDF to attach to their application in Grants.gov by selecting the Activity Planning (CFP grant planning) Module of EPIC, selecting the Annual Statement/Budget/P&E link, selecting the View Statements link next to the appropriate Annual Statement/Budget, selecting the View PDF link, and saving the PDF to the location of their choice to then submit with their NOFO application. The review of the 50075.1 will be based on Part II of the form.

PHAs should note that the application deadline will not be extended based on any technical issues they may encounter in EPIC. PHAs may create their 50075.1 on paper in lieu of creating this document in EPIC.

29. Can funds from this NOFO be used to replace hazardous materials with non-hazardous materials, i.e. replacing Asbestos pipe shielding with fiberglass shielding, or would it be only for testing and removal?

Intact asbestos-containing materials are not a hazard; they should be monitored for damage or deterioration and isolated if possible. See Appendix B of the NOFO, and Rating Factors 1 and 2 for more information. Generally, applications that include work to remove or replace "other hazards" will not be as competitive as those that propose to address the priority hazards identified in Rating Factor 1.

30. Could an elevator rehab be considered under Other Housing-Related Hazard?

Yes, if the applicant can justify that it is a housing-related hazard and can describe need as identified under Rating Factor 2. Applications that include work to remove or replace "other hazards" will not be as competitive as those that propose to address the priority hazards identified in Rating Factor 1. The

application may also be less competitive under Rating Factor 2 if there is not an active hazard associated with the elevator.

31. Do rodents in the walls qualify as a pest infestation hazard?

The presence of rodents would be considered a housing-related health hazard, see Appendix A. Applicants would be encouraged to conduct an additional assessment and propose work activities that support Integrated Pest Management (IPM) and are Capital Fund eligible. Example eligible activities could include performing an IPM assessment, sealing cracks and holes in the foundation or building exterior, replacing doors, and/or replacing floor drains. The website cited in the Appendices includes a link to stoppests.org, and some best practices from Boston Housing Authority, Guidebook for Structural Approaches to Integrated Pest Management.

32. Can HRHCF grants be used for an initial pest infestation treatment as part of Integrated Pest Management?

Funds cannot be used for an initial pest infestation treatment as part of integrated pest management: they can only be used for capital work activities that are needed to address housing-related hazards resulting from pest infestation. Examples of eligible activities could include performing an IPM assessment, sealing cracks and holes in the foundation or building exterior, replacing doors, and/or replacing floor drains. The website cited in the Appendices includes a link to stoppests.org, and some best practices from Boston Housing Authority, Guidebook for Structural Approaches to Integrated Pest Management.

33. Can we use our annual formula-based Capital Fund grants for a radon evaluation? Will there be more funds available in the future to mitigate the radon if it exists? If radon mitigation has been included in the 5-year plan, can we still apply and if awarded then use our annual allocation on something else?

Yes, formula-based Capital Funds can be used for radon evaluation and mitigation. HUD anticipates future funding for radon and this program in the coming fiscal year based on Congressional appropriations. If radon mitigation has been included in the 5-year action plan, a PHA can apply for funding, and then amend the 5-year action plan to reflect the change. If a PHA has already performed radon mitigation work with its Capital Fund formula grants, it cannot apply for this grant to reimburse costs that were already incurred.

34. Could the funds be used to update fire panels, update fire alarm system, or purchase rangehood cooktop fire suppressors under the category of Fire Sprinklers in Rating Factor 1?

Installing fire sprinklers is a priority activity under Rating Factor 1. Other fire-related work in the property may be eligible if there is a current hazard but would be less competitive for funding. See Appendix A, #2 for a description of fire sprinklers and related work.

35. Can a PHA apply for HRHCF grants to repair spalling brick from the side of the building?

If spalling brick is creating a hazards for residents, it could be eligible under "Other Housing-Related Hazards" in Rating Factor 1 but it would not be as competitive for funding as applications for Mold, Carbon Monoxide, Radon, Fire Sprinklers, or Pest Infestation Hazards because it would only be awarded 1 point under Rating Factor 1.

36. Are PHAs allowed to use funding from HRHCF grants for security work?

Safety and security work is eligible under another Capital Fund Emergency Safety and Security Grant Program https://www.hud.gov/sites/dfiles/PIH/documents/2020-25pihn.pdf . Under the HRHCF program, an application that includes Capital Fund eligible work to address resident safety and security would not be as competitive under Rating Factor 1 as applications for Mold, Carbon Monoxide, Radon, Fire Sprinklers, or Pest Infestation Hazards because it would only be awarded 1 point, and the applicant would need to justify Need under Rating Factor 2.

37. Can a PHA apply for a HRHCF grant to replace a parking lot that has potholes?

The HRHCF program helps Public Housing Authorities (PHAs) identify and eliminate housing-related hazards in public housing such as mold, carbon monoxide, pest infestation, radon, fire hazards and other housing hazards. It is not clear from this question how a pothole presents a hazard to residents, and the applicant would need to support the funding request under Rating Factor 2.

38. Can the funds be used for lead-based paint testing?

Yes, evaluation and control of lead-based paint hazards is an eligible use of funds, but these applications would be less competitive because it is not a priority hazard under Rating Factor 1. PHAs that need funding for this activity are encouraged to apply to a future round of the Lead-based Paint Capital Fund NOFO.

Application Evaluation

39. Will lower priority items added with high priority items lower the chances of funding? Or is it advised to only address the higher priority items?

The maximum number of points under Rating Factor 1 is 5. If a PHA applies for a lower priority item and a higher priority item, it will receive points based on the scoring for the higher priority item. For example, if a PHA applies for funding to reduce a carbon monoxide hazard and to install fire sprinklers, the PHA will receive 5 points for Rating Factor 1.

40. Are smaller PHA's given the same scoring as larger PHA's since our need will appear to be less based on the lower number of units.

Need is based on the percentage of units, not the number of units. This allows smaller PHAs to be scored on the same level as smaller PHAs for Rating Factor 2.

41. Rating Factor 3 has 10 points for Description of Plan to Implement Grant. Where do we provide this information for the application? Is there a separate section or will you just use 50075.1 pt.1 and 2?

Part II of form HUD-50075.1 includes separate columns that will capture each project (i.e., IMS/PIC development) number and name and the work to be performed at each project.

42. Will an audit finding of segregation of duties impact the scoring? In our case, there is only person in the office, so it is difficult to segregate.

Yes. Any audit finding will decrease the PHA's score for Rating Factor 4.

43. Does E-LOCCS reporting in Rating Factor 4 include reporting in EPIC?

No, PHAs will only be rated based on reporting in the LOCCS system.

44. I found the application very confusing. Do you have any suggestion as to where I could find someone to assist in the process?

PHAs can use private consultants to assist them in the application process. Otherwise, access the additional materials posted to the PIH Capital Fund website at https://www.hud.gov/program_offices/public_indian_housing/programs/ph/capfund.

45. What is the average score of an approved application?

This is the first round of Housing Related Hazards grant funding, so we do not know the average score of an approved application.

46. Can there be more than one hazard in the application?   If I am working with 2 or 3 different type of hazards, do I need to create a specific narrative for each hazard, or can only one narrative be submitted as long as it does not exceed 5 pages?

Narrative response to Rating Factor 2 may not exceed 5 pages to cover all hazards listed in the application.

47. What are the top items given priority in Rating Factor 1?

Mold, Carbon Monoxide, and Radon are given the most points (5) under Rating Factor 1. Fire Sprinklers and Pest Infestation Hazards will receive 3 points. Any other hazards identified will receive 1 point for Rating Factor 1 and will therefore lead to a less competitive application.

48. Page 18 of the NOFO indicates that PHAs can receive a max score of 8 for LOCCS reporting under Rating Factor 4, but page 22 indicates that PHAs can revive a max score of 7 points for LOCCS reporting, which is the correct maximin score awarded for LOCCS reporting?

This was a typo published in the NOFO for Rating Factor 4, and as a result, one point will be added to each applicant's score for the LOCCS reporting subfactor in Rating Factor 4.

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