

## FY 2020 Choice Neighborhoods Planning Grants NOFA Questions and Answers

*Note: In accordance with the HUD Reform Act, HUD cannot provide a determination to questions that ask about a specific situation (e.g. whether something would be eligible or how it would be rated) outside of reviewing a submitted grant application during its formal review process. This Q&A is meant to provide general clarification to the NOFA language.*

- 1. Our neighborhood has a lot of distressed housing, but it is neither “public housing” or “assisted housing.” Can we still apply for a Choice Neighborhoods Planning Grant if our application meets the other eligibility criteria, but does not have “severely distressed public or HUD-assisted housing”?**

No, the “Eligible Target Housing” threshold requires that there be a severely distressed public or HUD-assisted housing project at the center of the planning process. Please see the Eligible Target Housing threshold in the NOFA. The terms “assisted housing,” “public housing,” and “severely distressed housing” are defined in the Program Definitions section starting on page 8.

- 2. Is a Public Housing Agency that only has a section 8 voucher program (i.e. no public housing under an Annual Contributions Contract) eligible to apply for a Choice Neighborhoods grant?**

Yes, a PHA with only a section 8 voucher program is an eligible applicant. However, please be mindful that tenant-based section 8 vouchers are not an eligible type of housing assistance to meet the “Eligible Target Housing” threshold requirement. An application from a voucher-only PHA still needs to focus on an eligible target housing project (e.g. public housing, project-based section 8) and meet all the other threshold requirements.

- 3. How many units or buildings need to be involved? If there are multiple buildings involved, how close geographically do they need to be to one another?**

There is no minimum or maximum for number of units or buildings designated as the target housing. There is no specific requirement about how close the projects must be to one another, but all the target housing must be located within the same neighborhood.

- 4. As a PHA seeking to revitalize one of our public housing projects, do we have to include all units assigned to the Asset Management Project (AMP) number in PIC? We would like to target one project that is listed with another project in the same AMP in PIC, though the other site is not located within the same neighborhood.**

Choice Neighborhoods does not require that all units within an AMP be included as the ‘target housing’ in a grant application. If multiple projects are combined into the same AMP, it can be appropriate for a Choice Neighborhoods application to only target one of the projects. While not required, an explanatory statement in the grant application (e.g. in Exhibit B – Threshold requirements) will help us understand the context.

- 5. If you have a co-applicant, aside from being an eligible applicant, must the co-applicant also meet all of the threshold requirements, statutory and regulatory requirements affecting eligibility and administrative/national/department policy requirements for HUD recipients? Specifically, I am thinking of the outstanding civil rights threshold, outstanding delinquent Federal debts, compliance with fair housing requirements, etc.**

Yes, the Co-Applicant must also meet all eligibility requirements.

- 6. How does the Outstanding Civil Rights requirements affect an application? Should we address this requirement in our narrative response submitted in Exhibit B?**

Applicants do not need to provide any specific statements about this threshold requirement. In reviewing the grant applications, the Choice Neighborhoods office will review the list of agencies with outstanding civil rights matters and work with the Office of Fair Housing and Equal Opportunity and/or Office of General Counsel to make any necessary determination about the grant application. An agency that has outstanding civil rights matters will not be eligible for a Choice Neighborhoods grant award. If your agency is currently on that list, we strongly suggest you work with the appropriate HUD offices to resolve such issues if you are interested in receiving a Choice Neighborhoods grant.

- 7. We see that the Resident Involvement threshold requirement changed this year due to the COVID-19 pandemic and that a public meeting is no longer required. The NOFA directs us to submit a copy of the written notification we provide each household. However, the Resident Involvement form (HUD-53151) required in past NOFAs was still included in the application package download from grants.gov. Are we supposed to use this form?**

No, that form is not required this year as HUD changed that threshold requirement. Its inclusion in the grants.gov application package was an error.

- 8. Regarding the Resident Involvement threshold, what if we are able to convene a public meeting in our neighborhood because our area has “reopened” per state/local declarations? Should we then just submit the Resident Involvement form (HUD-53151) as required in past NOFAs?**

No, the documentation submission requirement in this year’s NOFA is that each applicant provide a copy of the written notification to each household about the intent to apply for this grant. An application that does not include the documentation required by the NOFA would not pass the threshold and thus not be eligible for funding.

- 9. For the Preference Points related to Opportunity Zones, can you provide clarity around the certification requirement about spending 50% of award within Opportunity Zone tracts and the subsequent statement that “The application will earn points if any unit of the target housing site is located in a Census Tract that has been designated as an Opportunity Zone”?**

HUD recognizes that for a Choice Neighborhoods Planning Grant, it may be difficult to demonstrate grant funds being spent directly in the target neighborhood because planning activities are less tangible than physical redevelopment projects. Since the planning effort must focus on the redevelopment of the target housing project and devising strategies to support the residents of that housing, HUD has determined that the “50% requirement” is automatically satisfied if the target housing is located within an Opportunity Zone tract.

**10. Our neighborhood is located within an Opportunity Zone. Can we earn the points under the “Alignment with Existing Efforts” rating factor in addition to the two points available for under the Preference Points section?**

No. An application may only earn the two points under the Preference Points section for Opportunity Zones.

**11. I am having trouble filling out the pdf of the Opportunity Zone certification form provided in the application package download. Is there another version available?**

The Opportunity Zone certification form is one of the forms pre-loaded in the grants.gov application package online. Applicants should fill out that version as it will automatically prepopulate some data from the SF-424 form. The pdf included in the application download is just there for reference. If you continue to have issues, please contact the grants.gov help desk.

**12. We have an approved Section 18 application for our proposed CN subject property. In the NOFA, full points are awarded for both the Immediate Project Capital Needs and the Structural Deficiencies if the HUD Section 18 approval letter is attached. But the same is not the case for the Design Deficiencies rating factor. I just want to confirm that we should submit design deficiency information with the application even though HUD has approved a Section 18 application for the property.**

Yes, as the criteria to obtain section 18 demolition/disposition approval does not consider design deficiencies, that approval does not automatically earn full points for an application. The application must demonstrate the design deficiencies at the target housing site through a narrative response, photos, etc. as stated in the NOFA.

**13. In the Neighborhood Poverty Rating Factor, there is an overlap in the rating factor ranges table (4 points is 33.00 to 39.99%, 2 points is 25.00 to 33.99%). What is the correct range?**

The range for 4 points is 33.00 to 39.99%. The correct range for 2 points is 25.00 to 32.99%.

**14. For the Partnerships rating factor, in the Rating Factors table on page 38, it is worth 5 points, but on page 44, it says this factor is 6 points. Which is the correct value?**

The Partnerships rating factor is worth 5 points.

**15. In Grants.gov, there are not enough slots for us to upload all the exhibits and attachments listed in the Choice Neighborhoods NOFA. How am I supposed to submit the application?**

Grants.gov is a system used by the entire Federal government and its structure does not necessarily reflect the Choice Neighborhoods NOFA. Its attachment 1 does not explicitly mean the Choice Neighborhoods Attachment 1. Applicants should zip together the multiple attachment files (in one or more zip files, depending on the size) they have prepared in accordance with the Choice Neighborhoods NOFA and plug them into the slots provided by Grants.gov. Please be reminded that, as instructed in the NOFA, each narrative exhibit and attachment must be its own file. Do not simply create files that include multiple exhibits or attachments.

**16. My organization is interested in applying for the grant. I am attempting to identify HUD housing eligible for the project. Does HUD maintain a list of its housing considered to have structural and design deficiencies?**

No, HUD does not maintain a list of properties that meet this program's definition of "severely distressed." You can locate properties subsidized through HUD's rental assistance programs housing via HUD's Enterprise Geospatial Information System (eGIS) website at <http://hudgis-hud.opendata.arcgis.com/>.

**17. If my city has already received a Choice Neighborhoods grant, can my organization apply for a Planning Grant in a different neighborhood?**

Yes. The new application must be for a different target housing project and different neighborhood than the previously awarded Choice Neighborhoods grant.

**18. Will HUD accept a Physical Needs Assessment (PNA) that does not include going into 10 percent of the units for physical inspections? We had an outside firm conduct inspections and prepare a PNA for our target housing site more than 3 years ago (the time limit allowed for in the NOFA). We are hesitant to go back to the firm to update the PNA in light of the COVID-19 situation. Since area has been identified as one with very high exposure and spread, we have refrained from entering residents' apartments to the extent possible.**

We suggest that you inspect units that are currently vacant, consider ways to do virtual inspections, etc. in order for the third-party professional to sign off on the integrity of the PNA and their report. Additionally, please remember that this is used for the Immediate Project Capital Needs rating factor, not a threshold requirement. Thus, an application that does not present information from a recent PNA is still eligible for funding. It just could not earn the points for this rating factor.

- 19. We plan to target two public housing projects that are adjacent to each other in our Choice Neighborhoods grant application. Do we need to submit separate documentation (the certification of severe physical distress, the PNA, etc.) for each project?**

The main thing is that the application be clear to HUD that all units are included in the documentation submitted. For the certification of severe physical distress, you can submit one form and list each project separately. For the PNA, typically a separate report is done for each project.

- 20. Can a Public Housing Agency can use its Moving to Work (MTW) funds as a source of match in meeting the five percent match requirement for a Choice Neighborhoods Planning Grant?**

No. As stated in the NOFA, federal funds can only be counted as match for Choice Neighborhoods grant if that funding's statutory authority states it may be considered as such. The U.S. Housing Act of 1937, as amended, which is the authorization for the public housing Operating Fund, Capital Fund, and Section 8 funding (which MTW agencies may then combine for cross-program uses), does not include such language. Accordingly, these funds may not count as match (though they can be used in conjunction with a Choice Neighborhoods planning process per their permissible uses).

- 21. We have started the process to amend our PHA Plan to include the proposed planning process focused on one of our projects, but if the amendment may not be formally approved by HUD before the grant application deadline. Can our executive director still sign the certification of consistency with the PHA plan to earn the point for that rating factor?**

No. The NOFA only provides for the point to be earned based on the 'most recently approved' plan.

- 22. If we have already demolished the target public housing site, via demolition approval from HUD's Special Application Center, do we still need to get a severely distressed certification signed by an architect/engineer to include in the application?**

All applications must include the Certification of Severe Physical Distress (form HUD-53232). On the form, there is space to indicate the project has already been demolished.

- 23. Regarding the resident notification about our intent to submit a grant application, the NOFA requires submission of "a copy of the notification delivered to each household" (emphasis added). Does that mean we need to submit a copy of each individual letter (i.e. should I include as many copies as the number of households living in the development? )? Or would one copy of the letter suffice?**

An application only needs to include one copy of the notification that was sent.

**24. I am confused about “match” vs. “leverage.” Per the NOFA match can be cash or in-kind (p. 17) and the NOFA also states that match can be used for the leverage rating factor (p. 48). It also states that leverage has to be cash (pp 47-48). Can all of match (cash/in-kind) can be applied to the Leverage Rating factor?**

No, not all match can be counted as leverage. For purposes of this NOFA, “match” and “leverage” do not have the same meaning. First, let us clarify the match requirement: the statutory requirement [section 24(c)(1)(A) of the 1937 Act (42 U.S.C. 1437v(c)(1)(A))] is that by the end of the grant term, the grantee will have secured a match of at least 5 percent. As a requirement in this NOFA, the applicant certifies [as part of the form provided under the Choice Neighborhoods Application Certifications form] it will meet this requirement. It is not a requirement that the match be in place at the time of the grant application. However, to encourage applicants to have funds committed from the outset and to exceed the match requirement, the NOFA provides points for applicants that secure leverage in advance of submitting the application. In order to earn points under this rating factor, the leverage must be a cash commitment.

**25. For Exhibit D Need – Structural and Design Deficiencies, the FY20 NOFA states to review and provide narrative to V.A.1.B., the ‘NEED’ section. This includes multiple subsections (i.e. Severe Physical Distress of the Target Housing, Severe Distress of the Targeted Neighborhood, and Need for Affordable Housing in the Community). In FY19’s NOFA, Exhibit D Need directed you to V.A.1.B.1.c which only included Design Deficiencies. Does this change now mean that Exhibit B needs to include a narrative response to every item in the NEED section OR only V.A.1.B.1.b Structural Deficiencies and V.A.1.B.1.c Design Deficiencies?**

This year’s NOFA no longer requires that the Structural Deficiencies response to be in the form of a letter/report prepared by a third party. It can now be a narrative written by the applicant and that’s why there is now space for it in the narrative Exhibit B. As you can see in the Table of Contents, Exhibit D is for responses to two of the Need rating factors: structural deficiencies and design deficiencies. The information for the other Need rating factors should be placed in the various attachments of the grant application as listed in the NOFA.