

Family Unification Program Notice of Funding Availability for Fiscal Years 2017 and 2018

Frequently Asked Questions

Any questions submitted to FUPVouchers@hud.gov will be answered in this document. The document will be updated periodically and reposted with the date it was updated.

As of June 5, 2018, questions are now organized into topic areas.

Updated: July 23, 2018

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1. Accessing and Completing the NOFA

1.1. Question: How do I download the NOFA from Grants.gov?

Answer: To download the NOFA from the [View Grant Opportunity page](#) on [Grants.gov](#), click on the “Related Documents” tab. Click the link titled, “FR-6100-N-41-Full Announcement – FUP NOFA & Sample MOU.zip.” The full text of the NOFA and a Sample MOU will appear in this folder.

The NOFA is also available for preview at the following locations:

https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family

https://www.hud.gov/program_offices/public_indian_housing/programs/hcv

A Sample Memorandum of Understanding (MOU) is also available at the two links above

1.2. Question: I am having troubles with grants.gov unrelated to accessing the NOFA, how can I get assistance?

Answer: Please see the following webpage for support information:

<https://www.grants.gov/web/grants/support.html>

1.3 Question: Can the required Statement of Need be incorporated into the MOU, or does the Statement of Need have to be a separate document?

Answer: No. The Statement of Need must be a separate document.

1.4. Question: How can I preview the NOFA without opening the zip file on grants.gov?

Answer: The NOFA may also be previewed at https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family.

1.5. Question: Does HUD have guidance on what must be included in the statement of goals and standards of success in administering the program?

Answer: HUD does not have guidance on this subject.

1.6. Question: The MOU is required to include the PHA and PCWA's goals and standards of success in administering the program. CoCs appears to have been excluded from this requirement, is this correct?

Answer: The MOU is only required to include the PHA and PCWA's goals and standards of success in administering the program. A community may decide to include the CoC's goals and standards of success as part of an effort to increase "buy-in" and accountability across partnering organizations.

1.7. Question: How can I learn more about the Family Unification Program (FUP)? How do I apply?

Answer: More information about FUP is located on our webpage at the following link: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family. To apply, please visit Grants.gov. To download the NOFA from the [View Grant Opportunity page](#) on [Grants.gov](#), click on the "Related Documents" tab. Click the link titled, "FR-6100-N-41-Full Announcement – FUP NOFA & Sample MOU.zip." The full text of the NOFA and a Sample MOU will appear in this folder.

1.8. Question: In the NOFA it is unclear as to whether the whole applications is the MOU or if the application is a narrative, which includes the MOU as an attachment.

Answer: The MOU is not the whole application. A complete application must include the forms, the MOU, narratives, and non-form attachments as provided for in Section IV.B. of the NOFA.

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

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

1.10. Question: Does the NOFA require matching funds?

Answer: The NOFA does not require matching funds. (See Section III.B. of the NOFA.)

1.11. Question: Where can I see the instructions to development proposal (Pages max, size and other requirements?)

Answer: The NOFA indicates what is required of an applicant under the relevant sections. If a submission requirement does not list a maximum length, e.g., the Memorandum of Understanding (MOU), HUD did not establish a maximum length. Some elements do list a maximum length. For example, the Statement of Need shall be a maximum of five pages long. The NOFA should be read in its entirety to ensure compliance with such requirements.

1.12. Question: In Section IV.B.2 of the NOFA it states:

Format and Form. Narratives and other attachments to your application must follow the following format guidelines.

Then there is nothing after that. Does this mean there are no format requirements for narratives and other attachments?

Answer: Section IV.B.2. of the NOFA is a standard section included in all HUD NOFAs. This NOFA does not utilize this section to communicate requirements for narratives or other attachments. Instead, requirements are included within the description of the specific item.

Example 1: Section IV.B.1.b. includes the requirement that the Statement of Need shall be a maximum of five pages long.

Example 2: To meet the documentation requirement for the Self-sufficiency program Rating Criteria points under Section V.A.1. of the NOFA, the PHA applying for points under this category shall provide: (a) A narrative (of no more than 5 pages) or (b) the section referencing these current policies of its most recent FSS Action Plan/policy document of a similar program promoting self-sufficiency.

Applicants should carefully review the requirements within each element.

1.13. Question: The NOFA states: Where there is more than one CoC in the PHA's jurisdiction, the PHA must determine whether it will enter into an agreement with more than one CoC." For our application, the PHA and PCWA intends to enter into agreements with multiple CoC's 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 CoC's we are partnering with be on the same MOU?

Answer: HUD will only review one MOU. Communities have discretion in how they design their MOU to include multiple parties as long as the MOU includes the required elements and is submitted as one document.

1.14. Question: Where there are multiple CoCs, can each CoC signs the MOU.

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

1.15. 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.

1.16. Question: In our CoC, the Authorized Representative for the Collaborative Applicant and the CoC Board Chair are the same person. The NOFA requires that both sign the MOU. Is this a problem that they are the same person.

Answer: This is not a problem. Where an individual is both the Authorized Representative for the Collaborative Applicant and the CoC Board Chair the individual may sign under both roles.

1.17. Question: What agencies staff person(s) are required to the sign the MOU and Narrative Statement?

Answer: *Signing the MOU:* Section III.C.8 of the NOFA states: The PHA must submit a MOU executed by the Executive Director, Chief Executive Officer, or individual of equivalent position, of the PHA and PCWA, CoC Board Chair, and the CoC Collaborative Applicant Authorized Representative. Where there is more than one CoC in the PHA's jurisdiction, the PHA must determine whether it will enter into an agreement with more than one CoC. If a PCWA is authorized under State law to contract out its functions and it has done so, both the executive director of the PCWA and the executive director of the contractor organization must sign the MOU. The MOU execution date must be between the date this NOFA is published and the application deadline date under this NOFA. The MOU will be considered by HUD and the signatories (the PHA, PCWA and the CoC) as a complete statement of the responsibilities of the parties and evidence a commitment of resources to the FUP. As such, the document should be very specific. HUD strongly encourages applicants to carefully read all of the requirements of the MOU addressed in this section.

Signing the Statement of Need: Section IV.B.1.b. of the NOFA states: The Statement of Need must be signed by the Executive Director, Chief Executive Officer, or individual of equivalent position, of the PCWA, even if the PCWA has authority under applicable State law to contract out its functions to another organization. The Statement of Need must also be signed by the CoC Board Chair and CoC Collaborative Applicant Authorized Representative.

1.18. Question: Outlined in the scoring portion of the NOFA is self-sufficiency programs–

Our PHA does not currently administer any FSS funds. The NOFA states we may submit a narrative of proposed strategies; whether these strategies will be adopted in a HUD Family Self-Sufficiency program or similar program promoting self-sufficiency; and the time line.

Does the proposed action plan need to provide for escrow accounts and must form HUD-52650 be used or can the PHA, PCWA, and CoC work together to develop an action plan/self-sufficiency program directly related to the youth and families receiving FUP vouchers.

Answer: The NOFA does not specifically require an escrow account for participants. The similar program promoting self-sufficiency refers to a self-sufficiency program that promotes the development of local strategies to coordinate the use of assistance under the HCV program with public and private resources to enable participating families to increase earned income and financial literacy, reduce or eliminate the need for welfare assistance, and make progress toward economic independence and self-sufficiency.

1.19. Question: The Sample MOU has the “track changes” mode enabled in the document. Are we able to type our own MOU or are we required to use the SAMPLE MOU document? Does HUD want the sample wording and “track changes” item left in the document so they can see what we have added?

Answer: HUD created the Sample MOU to reduce administrative burden for applicants. As noted in the Sample MOU, the document demonstrates the MOU requirements listed in Section III.C.8, and the optional rating factor elements listed in Section V.A.1 of the Family Unification Program Notice of Funding Availability for Fiscal Years 2017 and 2018. Applicants are not required to use the Sample MOU. If using the Sample MOU, applicants will want to customize the document to meet their needs within the scope of the NOFA. Applicants that use the Sample MOU are not required to highlight, markup, or otherwise call out the ways in which the document was customized to meet their needs. Applicants may choose to create their own MOU that meets the requirements of the NOFA.

1.20. Question: Do we need to provide a methodology report on how we came up with the dollar amount to request? I looked at the NOFA again and didn’t find anything.

Answer: The Statement of Need must specify the number of vouchers projected to be needed to assist FUP-eligible families and FUP-eligible youths over a 12-month period and describe how this estimate was calculated. (See NOFA Section IV. B. 1. B.)

1.21. Question: I had a quick question regarding the “Case Management to FUP families” section on page 32 of the NOFA. Elsewhere in the NOFA, FUP-eligible families and FUP-eligible youth are distinguished separately, however, this section only identifies FUP families. Does this mean that services are not required to be provided to FUP-eligible youth? Or does this scoring criteria include youth utilizing the vouchers, as well?

Answer: Case management to FUP families is a rating factor under Section V.A.1. of the NOFA and is not a threshold requirement. This is separate from the threshold requirement to provide services to FUP youth. This youth services threshold requirement is found in Section III.C.8. of the NOFA.

1.22. Question: Section IV.B.1. under the description of requirements for Form SF424 says, “In Section 18 (Estimated Funding), complete only 18.a. and 18.g. The amount entered in both fields should be the total number of vouchers requested in Section D of the form HUD 52515 times the housing assistance payments per unit cost for 2017 HCV renewal funding, depending on the most recent available data.” Is the form HUD 52515 required? Is a Section D narrative required as well?

Answer: HUD is not requiring the submission of form HUD 52515 to be submitted with the NOFA application. Section D of form HUD 52515 is the statement of need for housing assistance. Section D says, “Demonstrate that the project requested in this application is responsive to the condition of the housing stock in the community and the housing assistance needs of low-income families residing in or expected to reside in the community.” This information will have already been included in the Statement of Need as required by the NOFA. The amount to be entered under 18.a. and 18.g. is the amount requested under the Statement of Need, where the number of vouchers is represented in a dollar amount.

1.23. Question: The NOFA states that the Statement of Need can be no longer than 5 pages. Are there further requirements for the formatting of this document, e.g., double-spaced, etc.?

Answer: The only requirements are those included in the NOFA. An applicant may choose to use single space or double space for the Statement of Need.

1.24. Question: How should form HUD 2880 be completed?

Answer: Please review the instruction on the form HUD 2880. Applicant information must be completed. Applicant name and information is that of the Public Housing

Agency. Do not report Social Security Number. Amount of HUD assistance is the total FUP voucher amount requested. Applicants will answer yes to Part 1. Question 1. The response to Part 1. Question 2 will be determined by the amount of assistance being requested under this NOFA. 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. Again, please read the instructions on the form completely.

Under Part II, the Department is HUD, type of assistance is Grant, amount requested is the total amount of FUP assistance requested, expected use is FUP. Part III may be left blank only if you responded “No” to Question 2 in Part I. Do not include Social Security Number in the response.

1.25. Question: Does a PHA need to specify the minimum and/or maximum number of FUP vouchers it is requesting?

Answer: The NOFA did not require the provision of a minimum and/or maximum.

1.26. Question: Is the signed Certification Regarding Lobbying required even if my PHA will not conduct lobbying?

Answer: Yes, it is required. This portion of the NOFA is part of HUD’s General Section. Applications must meet all the requirements of the General Section in addition to the requirements of the NOFA to be considered and potentially receive funding. Applicants are subject to the provisions of Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment) and 24 CFR part 87, which prohibit recipients of federal awards from using appropriated funds for lobbying the executive or legislative branches of the Federal government in connection with a specific award.

All applicants must submit with their application the signed Certification Regarding Lobbying included in the Application download from Grants.gov. In addition, applicants must disclose, using Standard Form LLL (SF-LLL), “Disclosure of Lobbying Activities,” any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific grants or contracts. Federally recognized Indian tribes and tribally designated housing entities (TDHEs) established by federally-recognized Indian tribes as a result of the exercise of the tribe’s sovereign power are excluded from coverage of the Byrd Amendment, but state-recognized Indian tribes and TDHEs established only under state law shall comply with this requirement. Applicants must submit the SF-LLL if they have used or intend to use non-federal funds for lobbying activities.

Question 1.27: Question: Is the Form HUD 96011, Third Party Documentation Facsimile Transmittal required?

Answer: Form HUD 96011 will not be used for this NOFA. To submit supporting documentation, the applicant should scan and attach to the Grants.gov Attachments Form included in every HUD application template on Grants.gov.

1.28 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 NOFA does not require the estimated funding amounts for services to be provided.

1.29 Question: Are PHAs with a FUP utilization less than 90% encouraged to apply or should they not apply at all? For those PHAs with less than 90% utilization with a potential to fully lease up with 6-12 months, can they still apply?

Answer: An application with a FUP utilization rate of less than 90% will not be considered for funding under the NOFA as this is a threshold requirement.

1.30 Question: If the relevant PCWA has chosen to enter into an MOU with a statewide housing agency for the purposes of responding to this NOFA, 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 the MOU.

1.31. Question: We are assuming that the changed closing date is the only difference between the FUP NOFAs published April 26 and June 19th. Is that correct? If there were changes other than the date, can you indicate the section numbers and letter where the other changes can be found?

Answer: There were no FUP programmatic changes made to the new NOFA published on June 19. The Technical corrections had to do with the typo regarding the minimum number of points on page 31 and page 34 of the NOFA.

1.32. Question: On page 12: Section 8 Management Assessment Program. Each applicant must have achieved at least 15 points under the Section 8 Management Assessment Program (SEMAP) leasing indicator (24 CFR 985.3(n)) and not be designated as troubled for its most recent assessed fiscal year, as of the date this NOFA is published. MTW agencies that are not required to report under SEMAP must have achieved at least 95 percent lease-up or budget authority utilization. Submission of the application under this NOFA by an MTW agency will serve as the agency's certification

that they are not required to report under SEMAP, and that they meet the 95 percent lease up or budget authority utilization requirement. Because the application itself becomes the MTW agency certification, the MTW agency no longer needs to submit a separate certification to this effect.

1.33 Question: Does “budget utilization” refer specifically to HCV authorized allocation or is it referring to the entire agency budget authority?

Answer: A PHA is credited with the higher of BA utilization or unit utilization. BA utilization is defined as the HAP expenditures reported in VMS for the Calendar Year (CY) (numerator) divided by the total budget authority for the CY (denominator). Budget authority for new units awarded are excluded in the denominator. Conversely, unit utilization is defined as Total Units Leased (numerator) as reported in VMS for the CY divided by Unit Months Available for the CY (denominator). New units awarded in the given year is not included in the denominator.

1.34 Question: Is the PHA applicant allowed to be the provider of supportive services to FUP eligible youth rather than the PCWA? If so, is laying this out in the MOU sufficient for showing this is being done by “agreement” between the PCWA and PHA, to fulfill the requirement that the services are being “provided to FUP-eligible youth by the PCWA or by another agency/organization under agreement/contract with the PCWA” in the NOFA?

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. The MOU is sufficient to meet the “under agreement” requirement.

1.35 Question: We administer two Continuum of Care Programs. On the MOU it asks for the COC name and address. Would we put our name and address?

Answer: A PHA works in Collaboration with a CoC, and at times administer the grant for the CoC. Please place the CoC ‘s Name. Address is not required.

2. Eligibility

2.1. Question: If my PHA already administers the Family Unification Program (FUP), are we eligible to apply under this NOFA for new incremental FUP vouchers?

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

2.2. Question: What department would need to apply for the grant? Would it be Housing or Social Services? Or would we both be applying together?

Answer: HUD is unable to make a determination as to what part of an otherwise eligible organization assembles the application for the NOFA. The NOFA includes specific requirements for who in an organization must sign or otherwise execute a document. For example, the Memorandum of Understanding (MOU) must be executed by the Executive Director, Chief Executive Officer, or individual of equivalent position, of the PHA and PCWA, CoC Board Chair, and the CoC Collaborative Applicant Authorized Representative.

2.3. Question: Can any PHA apply for the FUP Grant that has an existing ACC with HUD for HCVs AND have demonstrated a commitment to administer FUP, which shall be verified by an executed MOU between the PHA, PCWA, and CoC or only PHAs that already have an allocation of UFP vouchers?

Answer: PHAs that do not presently administer the FUP, but are otherwise eligible, may apply.

2.4. Question: Can families apply for housing assistance through this NOFA?

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 NOFA are provided only to PHAs to administer the program. HUD does not administer the assistance directly to families.

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

Answer: Yes. PHAs do not have to previously have experience administering the FUP.

2.6. Question: Our community has FUP vouchers available through the local PHA. Our need for these vouchers exceeds supply. Can our community apply for an additional allocation of FUP vouchers? If so, who is eligible?

Answer: PHAs that already administer the FUP are eligible to apply under this new NOFA opportunity. Only PHAs that have an existing ACC with HUD for HCVs are eligible to apply for funding under the NOFA. See the NOFA for additional eligibility information.

2.7. Question: Can these funds be used for home repairs?

Answer: Funding under this NOFA may be used to provide tenant-based or project-based housing assistance.

2.8. Question: Will having less than 15 points make an applicant ineligible for the FUP grant?

Answer: Yes, an applicant is ineligible to apply for FUP vouchers under this NOFA, if the applicant did not achieve at least 15 points under SEMAP leasing indicator (24 CFR 985.3(n)). Furthermore, the applicant cannot be designated as troubled for its most recent assessed fiscal year, as of the date this NOFA is published. If the applicant is an MTW agency not required to report under SEMAP, there are other requirements pertaining to this type of applicant listed in the Family Unification Program Notice of Funding Availability for Fiscal Years 2017 and 2018.

2.9. Question: For clarification, is this grant direct funding to support the described placements, or is it vouchers for which we would need to find providers to accept them?

Answer: This NOFA is for new incremental Housing Choice Vouchers (HCVs). These HCVs may be used in the form of tenant-based assistance or project-based assistance. Tenant-based FUP vouchers are used to find housing in the private market. The MOU must describe the assistance that will be provided to FUP families and youth in locating housing units and working with landlords to secure appropriate eligible units.

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

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

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

Answer: Per the NOFA, 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.

2.12. Question: Can you address eligibility under the following scenarios?

(1) Youth at least 18 not yet 25 - left foster care for a "permanent placement" or reunified with family, but a year later are homeless - are they eligible for the FUP vouchers?

(2) Youth at least 18 not yet 25 that are parents (have a child in their care) - are they eligible for the FUP vouchers?

(3) Youth at least 18 not yet 25 - What if a youth was placed in foster care within the PHA's jurisdiction but is from a different area - how does that impact eligibility for FUP vouchers?

(4) Youth at least 18 not yet 25 - What if a youth is from within the PHA's jurisdiction but his/her placement in out-of-home care is outside of that jurisdiction and the youth wishes to return to his/her original community - how does that impact eligibility for FUP vouchers?

Answer:

Under **Scenario 1**, assuming the youth has not yet reached their 25th birthday, the youth may be determined to be eligible within the information provided.

Not enough information is provided in **Scenario 2** to make an eligibility determination. Having a child does not disqualify a youth from receiving a FUP youth voucher. In the Scenario, the youth has a child in their care. If the lack of adequate housing is a primary factor in the imminent placement of the family's child in out-of-home care, the youth may be determined eligible for a FUP family voucher.

Scenarios 3 and 4. HCV waiting list preferences apply in the selection of FUP applicants for a FUP voucher in relation to other FUP applicants on the HCV waiting list. For example, if the PHA has a residency preference and FUP applicant A qualifies for that preference but FUP applicant B does not, then FUP applicant A must be selected first from the HCV waiting list when a FUP voucher becomes available. On the other hand, the PHA must select a FUP applicant for a FUP voucher (when available) even if the next person on the HCV waiting list for a regular HCV qualifies for a preference that the FUP applicant does not.

3. Utilization

3.1. Question: I have a question regarding the low FUP voucher utilization threshold of 90%. Our agency is currently allocated 22 FUP vouchers. For January and February 2018, we only had 19 FUP vouchers active but we had 3 FUP vouchers pending with applicants searching during those months. However, that won't show in VMS. Will HUD consider the pending vouchers in the threshold requirement?

Answer: HUD will not consider pending vouchers in the threshold requirement. Under the scenario described, a PHA with two months at 86% utilization will have to have a utilization for the other four months used to determine a PHA's average utilization that is high enough to average out to a 90% utilization or greater. The following chart shows how this PHA may still meet the utilization threshold.

Month	Number Leased of Total	Utilization (%)
Month 1	20 of 22	90.90%
Month 2	19 of 22	86.36%
Month 3	19 of 22	86.36%
Month 4	20 of 22	90.90%
Month 5	21 of 22	95.45%
Month 6	21 of 22	95.45%
Average for 6 months		90.90%

3.2. Question: Will HUD consider an application with a FUP utilization rate of less than 90% for funding under the NOFA?

Answer: No. This is a threshold requirement.

3.3. Question: My PHA is reviewing the FUP NOFA currently available. We understand that there is a utilization requirement for current FUP vouchers holders and are working to estimate our rate to ensure eligibility.

- a. We have FUP vouchers awarded during two separate competitions. Will all our FUP vouchers be counted, or only specific competition awards?
- b. Based on "six months prior to the application date", we understand that this calculation will pull utilization from February - July 2018 from VMS. Is that correct?
- c. Do we count in our utilization vouchers that are in process of moving from one unit to another?

Answer:

- a. Yes, all FUP vouchers will be counted;
- b. HUD will use the VMS data from the most-recently quality-checked information from VMS. This tends to include a lag of one month or so.
- c. If the mover left the unit and thus are not under HAP, but do have a voucher and are out searching, we do not count the mover as a Unit Months Leased (UML). If they are in a unit and are issued a move voucher, but we are still paying HAP, we count them as a UML.

3.4. Question: Are there any exceptions to the threshold requirement for 90% utilization of FUP vouchers? Our PHA was in shortfall and not able to meet the utilization threshold. Is there an exception for shortfall PHAs?

Answer: HUD is not making exceptions to the threshold requirement for FUP utilization.

3.5. Question: If a PHA currently administering the FUP does not have a FUP utilization rate of 90 percent or greater, but receives all other points in the NOFA, will their

application be rejected and therefore should not be submitted? Or do they just lose “X” points in that area?

Answer: For PHAs currently administering the FUP, their utilization must be 90 percent or greater. This is a threshold requirement. No further consideration will be given for those with a FUP utilization rate of less than 90 percent.

3.6. Question: If an application will be rejected/denied for PHAs currently administering the FUP that have a FUP utilization rate of less than 90 percent, then how can PHAs that don’t currently have a FUP program be eligible to submit an application. Will you be looking at the Section 8 Management Assessment Program (SEMAP) of PHAs that do not currently administer the FUP?

Answer: HUD established as a policy priority, the satisfactory FUP utilization baseline for eligibility of new FUP awards for PHAs already administering the program. This does not impact the eligibility of PHAs that do not administer the FUP. Section III.C.7. of the NOFA details the SEMAP threshold requirement.

3.7. Question: The NOFA says that MTW agencies that are not required to report under SEMAP must have achieved at least 95 percent lease-up or budget authority utilization. If an MTW agency has expended 95% of HCV budget authority on allowable uses per their MTW agreement, will the agency meet the threshold?

Answer: An MTW agency that has expended 95% of HCV budget authority on allowable uses per their MTW agreement will have met the threshold.

3.8. Question: Is HUD waiving the FUP utilization rate for communities impacted by natural disasters in 2017?

Answer: HUD is not waiving this threshold requirement.

3.9. Question: Will any consideration be given to the following scenario regarding the utilization threshold?

PHA was in shortfall status and unable to issue new FUP vouchers; PHA exited shortfall status within the last six months; PHA currently has a 90% FUP utilization rate, but due to the shortfall restrictions does not have a six month average utilization of 90%.

Answer: The NOFA states: Each applicant currently administering the FUP must have a FUP utilization rate of 90 percent or greater. Compliance will be determined by taking the average utilization for the six months prior to the application deadline date (based on data availability). HUD is not making exceptions to the threshold requirement for FUP utilization.

3.10. Question: I am seeking clarification of the definition of utilization within the 2018 FUP NOFA. In the application, it clearly states as a threshold requirement: “Each applicant currently administering the FUP must have a FUP utilization rate of 90 percent or greater. Compliance will be determined by taking the average utilization for the six

months prior to the application deadline date (based on data availability). For the purpose of tracking FUP utilization, HUD will be using the Voucher Management System (VMS). The Department has made guidance available on reporting requirements in Notice PIH 2011-52.”

When referring to reporting requirements in Notice PIH 2011-52, PHA’s are instructed to code FUP vouchers issued for families as “FUPF” and vouchers issued for youth as “FUPY.” Since the vouchers are coded differently, could a PHA apply for vouchers to be applied in only one area (for example additional vouchers to be applied for families only) and **only** cite the averaged utilization rate of vouchers used for families? Or does the PHA have to consider the averaged utilization for all FUP vouchers regardless of coding?

Answer: By Statute, both populations are eligible to be assisted under the Family Unification Program (FUP). PHAs may not exclude a Statutorily eligible population from participation in the FUP. The Voucher Management System (VMS) utilization is based on all FUP vouchers leased-up by a PHA. “FUPF” and “FUPY” are identifiers for each of the FUP voucher utilized by the PHA and are both reflective in the total utilization rate of a PHA.

3.11. Question: We currently have 2 FUP vouchers. In March/April, we transitioned one FUP to a traditional voucher, as the household had completed case mgmt. and was no longer followed by a social worker. We did this so we could serve another family; however, that family did not lease up as quickly as anticipated, which has left our utilization below 90%. Our utilization has been 100% for two consecutive years, except we are currently at 83.3% for the most recent 6 months. Does this preclude us from qualifying for this round of FUP?

Answer: Compliance will be determined by taking the average utilization for the six months prior to the application deadline date (based on data availability). For the purpose of tracking FUP utilization, HUD will be using the Voucher Management System (VMS). HUD will use the VMS data from the most-recently quality-checked information from VMS. This tends to include a lag of one month or so.

4. FUP Program Requirements

4.1. Question: The NOFA mentions two eligible populations:

1. Families for whom the lack of adequate housing is a primary factor in the imminent placement of the family’s child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care; and
2. Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday), who left foster care, or will leave foster care within 90 days, in

accordance with a transition plan described in Section 475(5)(H) of the Social Security Act and are homeless or are at risk of becoming homeless at age 16 or older.

Is the NOFA for both populations, or may PHA apply to serve just one category?

Answer: By Statute, both populations are eligible to be assisted under the FUP. PHAs may not exclude a Statutorily eligible population from participation in the FUP.

4.2. Question: What are the transition plan requirements for youth aging out of foster care?

Answer: The transition plan requirements for youth who left foster care, or will leave foster care within 90 days, is provided for in Section 475(5)(H) of the Social Security Act. Child welfare agency staff that are unfamiliar with this Social Security Act requirement may want to reach out to other staff within their organization to determine how they are meeting this mandate. If there is still uncertainty, the State Foster Care Program Manager in your state may be of assistance. Contract information may be found here:

https://www.childwelfare.gov/organizations/?CWIGFunctionsaction=rols:main.dspList&rolType=Custom&RS_ID=155.

4.3. Question: May one MOU be used to cover FUP awards made under different years?

Answer: Yes, a PHA may have one MOU. An MOU being used under the new NOFA must meet all requirements as described in the NOFA.

4.4. Question: The MOU must include a statement that the required services “will be provided for a period of at least 18 months to FUP-eligible youth receiving rental assistance through the use of a FUP voucher regardless of age.” Does the requirement to provide services remain only 18-months even through the FUP voucher length for FUP youth is now 36 months?

Answer: While the length of assistance for eligible youth was changed from 18 months to 36 months, the length of services provided to youth through the PCWA was not changed.

4.5. Question: What period of time should be used in the presentation of data for the Statement of Need? Does HUD want a point-in-time count or a count of a set 12-month period?

Answer: The Statement of Need may be thought of as having two parts.

Part 1, which is asking for data at a point-in-time or moment-in-time. This part is broken out by FUP-eligible families and youth as follows:

- a. The number of FUP-eligible families who currently have children in danger of being placed in out-of-home care or who cannot be returned from out-of-home care due to inadequate housing.
- b. The number of youths who have attained 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act and are homeless or at risk of becoming homeless at age 16 or older. Reporting separately, the number of FUP-eligible youth in the community who are no longer part of the PCWA's active caseload (e.g., youth that left foster care who are now homeless or at-risk of homelessness).

Part 2 is asking for need over a 12-month period as follows:

The Statement of Need must also specify the number of vouchers projected to be needed to assist FUP-eligible families and FUP-eligible youths over a 12-month period and describe how this estimate was calculated.

4.6. Question: Will the administrative fees associated with FUP vouchers be fully funded?

Answer: Administrative fees for FUP, other special purpose vouchers (SPVs) and regular vouchers will be prorated at the national proration. Administrative fees for FUP vouchers is based on units leased reported in VMS as of the first of the month, which is consistent with regular vouchers.

4.7. 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 PHA must submit a MOU executed by the Executive Director, Chief Executive Officer, or individual of equivalent position, of the PHA and PCWA, CoC Board Chair, and the CoC Collaborative Applicant Authorized Representative. 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.

4.8. Question: In order for the youth to be eligible for the FUP vouchers they need to be 90 days from closing or closed with the PCWA? According to the FUP eligibility requirements, youth may be open with the PCWA but have left foster care, would these youth open with the PCWA but who have left foster care be eligible for the FUP vouchers?

Answer: The youth eligibility requirements are limited to those stated in the NOFA as follows:

Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday), who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act and are homeless or at risk of becoming homeless at age 16 or older.

Continued involvement with the PCWA is not a determinant for eligibility, except that the PCWA is responsible for determining eligibility for the FUP.

4.9. Question: My state is in the process of passing state legislation which will extend foster care, on a voluntary basis, to youth who are in foster care on the youth's 18th birthday. The court petition we have on the youth from before 18 will close and the youth will voluntarily be able to enter into the Voluntary Extension of Care program. This will allow them to continue to receive services from the Department on a voluntary basis until the youth's 21st birthday provided they are working at least 80 hours per month, participating in an approved workforce/career development program, enrolled in a secondary or post-secondary education program, participating in a combination of these work/education requirements, or have a medical condition that prohibits them from participating in work/education requirements. There will also be continued oversight by the Family Court. In states that have extended foster care, may FUP vouchers be provided to the Voluntary Extension of Care participants or do we have to limit it to youth who choose not to participate in the extension

Answer: The participation in extended foster care does not disqualify youth from participation in the FUP. For example, a youth returned to foster care prior to their 21st birthday. Upon reaching their 21st birthday, assistance is no longer available. The youth is unable to maintain stable housing and becomes homeless. If the youth is not more than 24 years of age, they may be determined eligible for assistance under the FUP.

4.10. Question: Can a PHA pass through any of their administrative fees for operating the FUP voucher program to a nonprofit agency that they may subcontract with to provide housing location and stabilization services to families in the program?

Answer: A PHAs may choose to use a portion of the administrative fees for eligible activities to be carried out by a third-party.

4.11. Question: If a state has elected to extend foster care to age 21 under the Voluntary Extension of Care provisions of the Social Security Act, can the young adults participating in the Voluntary Extension of Care program be eligible for FUP Vouchers prior to turning age 21?

Answer: Yes, as long as the eligibility requirements for FUP youth have been met as described in the NOFA.

4.12. Question: Are youth who leave foster care before the age of 18 with a transition plan (adoption, guardianship to a relative, reunification with family), but ultimately experience homelessness, eligible?

Answer: Such youth may still meet the eligibility definition assuming that they are not more than 24 years of age.

4.13. Question: Are youth who leave the system without a transition plan (left without notice) and experiencing homelessness eligible for the program?

Answer: Such youth may still meet the eligibility definition assuming that they are not more than 24 years of age.

4.14. Question: Our PHA has been giving wait list ‘preference points’ to Emancipated Youth over the past several years to help decrease the wait list time to be housed. This is without actual FUP vouchers. Our question is whether we would be permitted to ‘re-assign’ actual FUP vouchers to eligible youth currently housed under the HCVP program to free up our vouchers that are currently being used. Would this be permissible?

Answer: With the information provided in this question, these youth would not meet the eligibility requirements for FUP. Specifically, if these youth are already assisted they are not homeless or at-risk of homelessness.

4.15. Question: Is the PCWA allowed to prioritize, for example, younger FUP-eligible youth for referral over older FUP-eligible youth, based on a belief that those who are younger are in greater need of a voucher? Is there any additional general guidance or rules governing how a PCWA prioritizes its referrals more generally?

Answer: HUD has not issued guidance or rules governing how a PCWA prioritizes referrals to FUP. It should be noted that eligibility for FUP is defined in the NOFA. Providers of FUP assistance cannot use alternative eligibility requirements. For example, the PCWA cannot limit access to FUP to youth that are less than 20 years of age. The NOFA did not define how PCWA’s prioritize access to FUP for youth. HUD encourages PCWAs to leverage CoC experience in prioritizing those with the highest level of need, which may include a variety of factors.

5. Project-Basing FUP

5.1. Question: In the case of a housing authority that partners to finance development of new permanent supportive housing, what guidelines or requirements will HUD follow regarding timing for allocation of project-based FUP vouchers to a new construction project and timeline for drawing those funds? For example, our PHA allocates project-based vouchers to a project that will apply for tax credits this winter, showing the project-based vouchers in its layering review; project closes construction financing and starts

construction in the summer 2019, completes construction 12-24 months later. That would be approximately 24-36 months after HUD award announcement but would provide significant leverage for the vouchers and brand new units for the target population in a high-rent region where tenant-based vouchers are difficult to utilize.

Answer: FUP awards may be converted to PBV at any time after award, pursuant to PBV requirements. HUD notes that holding FUP vouchers without issuance will impact a PHA's Section Eight Management Assessment Program (SEMAP) performance. Further, low FUP utilization may impact a PHA's ability to receive subsequent allocations of FUP vouchers.

5.2. Question: If a PHA were to project-base a FUP voucher, what period of time would the contract be valid. Would the voucher renew beyond an initial tenancy?

Answer: FUP vouchers that have been project-based are no different from regular HCVs. The limit on the length of assistance for FUP youth is the only exception. For example, a PHA may enter into a new PBV HAP contract with an owner with an initial term of up to 20 years. This is the case for both regular HCVs and FUP vouchers.

After the initial funding increment expires, FUP vouchers are rolled into the PHA's renewal formula and funding for those FUP vouchers is included in the PHA's main HCV renewal increment. Renewal funding is based on validated leasing and cost data in VMS and is subject to subsequent renewals from future appropriations.

6. Other

6.1. Question: The NOFA states that awards will be announced on April 18, 2018, but this NOFA was not released until April 26 and is due July 24, 2018. Is there a different anticipated award date.

Answer: The anticipated award date was April 18, 2018. The NOFA was posted April 25, 2018. The anticipated award date of September 24, 2018, is unchanged at this time.

6.2. Question: Can you tell me if specific PHAs have applied for the NOFA?

Answer: HUD is not able to provide this information.

6.3 Question: If our PHA does not currently administer FUP, how would we certify that at least one FUP family and/or FUP youth is currently enrolled in our Family Self-Sufficiency Program?

Answer: This Rating Factor is only applicable to PHAs that currently administer the FUP.

6.4. Question: Specifically, I was wondering if this means that there is an additional housing voucher program available for parents involved with foster care and children

ageing out of foster care? If so, how can we get more information explaining the information.

Answer: The Family Unification Program (FUP) Notice of Funding Availability for Fiscal Years 2017 and 2018 provides funding to PHAs to administer the Family Unification Program to FUP-eligible-families and FUP-eligible youth. Please visit https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family to find out more information about FUP Vouchers Program.

6.5. Question: The period of performance on the NOFA (page 9 of 45, D.) lists the length of the project as 10/24/2018 to 10/23/2019. Is this 2017/18 FUP NOFA expected only to fund vouchers for a 12 month period? In other words, can our agency expect renewal funding for FUP vouchers, if awarded, or is this a 12 month only funding commitment, if awarded?

Answer: Renewal funding is subject to subsequent renewals from future appropriations.

6.6. Question: Is using CoC program-funded rapid re-housing assistance

Answer: Questions regarding eligible uses of CoC program funds should be directed to the Ask a Question feature on HUD Exchange: <https://www.hudexchange.info/program-support/my-question/>.

6.7. Question: Does HUD prefer that communities leverage non-HUD resources for moving costs, security deposits, and utility startups?

Answer: The NOFA only requires that the source of this funding be listed.

6.8. Question: What happens if we have leftover money at the end of the grant period? Not from leasing up applicants but perhaps from our initial request amount?

Answer: Any initial funding not used by the PHA during the year from any incremental award rolls over to its program reserves. The initial FUP funding can be used to augment any HAP FUP requirements in the subsequent year to augment FUP costs. However, be advise that the Voucher appropriations language allows the use of any excess program reserves to offset future shortfalls and to increase the national renewal proration. Excess program reserves that emanate from FUP funding may be subject to this future offset.

6.9. Question: What happens if we are able to lease up over the amount of vouchers we initially requested? We are looking at asking for 10 voucher but what if we lease 11 or 12? Are we able to do that and will we receive admin fee for those additional voucher holders?

Answer: Please see [Notice PIH 2018-09](#) regarding the prohibition on over-leasing.

6.10. Question: We had to make changes to our NOFA submission prior to the deadline. What version of the NOFA will HUD review?

Answer: HUD will only review the most recent version. For example, if an applicant's initial submission lacked required information and the applicant re-submitted the application with the required information, HUD will review the most recently submitted application.

6.11 Question: When I spoke to someone who works with the CoC, they stated the committee would probably not approve the CoC responsibilities outlined in Section VIII. Part A. "Integrate the prioritization and referral process for FUP-eligible youth into the CoC's coordinated entry process". I was told the CoC doesn't include "at risk" people. They deal with homelessness. I believe the drawback would be the prioritization, and the referral process. The gentleman wanted to know what the prioritization is (HCV waiting list prioritization?), the referral process (through the PCWA?), and the issue of "at risk" compared to homelessness. I have been looking through the NOFA and would like some guidance.

Answer: Questions regarding eligible uses of CoC program funds should be directed to the Ask a Question feature on HUD Exchange: <https://www.hudexchange.info/program-support/my-question/>.

See <https://www.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf> for Coordinated Entry Core Elements including the concepts of prioritization and referral. Within the requirements of the NOFA (e.g., required certification of referrals), communities will define for themselves what the prioritization and referral process looks like for accessing FUP vouchers.

The terms at-risk of becoming homeless and homeless are defined in the NOFA by the way of regulatory citation. (See Section I of the NOFA under program definitions.)

6.12 Question: The NOFA indicates a minimum award amount of \$44,000 and a maximum of \$1,071,000. Is this a cash grant in addition to a request for vouchers or is that the value of the vouchers?

Answer: The amounts provided are an estimate of the value of the of the minimum and maximum award based on the minimum and maximum number of vouchers.

Question 6.13: 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 communitywide 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/>.