



HUD FAMILY SELF- SUFFICIENCY PROGRAM

**FSS NOFO Frequently
Asked Questions (FAQ)
Document**

September 7, 2022



**U.S. Department of
Housing and Urban Development**

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*****FSS FY 2022 NOFO DEADLINE: Friday, October 7, 2022 @ 11:59:59 pm ET*****

FSS FY 2022 NOFO:

<https://www.hud.gov/sites/dfiles/SPM/documents/FR-6600-N-04FSSNOFO.pdf>

FSS Resources Page:

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

FSS Mailing List Signup:

<https://public.govdelivery.com/accounts/USHUDPIH/signup/30989>

Email us: FSS@HUD.gov

1. What's New: Changes from Previous NOFO.

Q1: What major changes are in this year's FSS Renewal NOFO?

A1: From the NOFO p.7 Applicants should read this entire NOFO carefully to ensure that all threshold and eligibility requirements are met (otherwise the applicant will be ineligible for funding), and that the program requirements listed in this NOFO) are followed.

- **FOR THIS FY22 NOFO ONLY** – ALL PHAs that were funded in FY21, FY20, or FY19 NOFOs may apply for funding in this FY22 NOFO, even if you didn't meet the minimum number of participants requirement, because HUD is giving all PHAs a grace year due the impacts of COVID-19. HUD will not use 2021 PIC counts to limit your Baseline Positions.
- **Opportunity for New Grantee Awards.** For the first time since FY19, we anticipate having funding available to New (not funded in FY19, FY20, FY21) applicants (after all eligible renewals are funded).
- **PBRA Housing (aka Project Based Rental Assistance or Multifamily)**
 - This NOFO will accept applications from PBRA Housing Owners for the first time due to now being included as eligible entities for funding in the FSS Final Rule. All PBRA applicants will be in the "New" category.
- **Two-Year NOFO.** This NOFO may be used to make awards for a Subsequent Year of Funding if future appropriated funding becomes available and allows. HUD may use the grant applications received from this NOFO to make additional year renewal awards. HUD also reserves the right to issue a supplemental FSS NOFO, which may have a limited pool of applicants.
- **PBRA Participants.** Funds awarded under this NOFO may be used to serve residents of Project-Based Rental Assistance (multifamily) regardless of whether they were RAD- affected. Previously, only RAD-affected PBRA residents could be served using NOFO funding.

- **Part-Time to Full-Time.** If you serve at least 25 participants (according to the PIC report in Appendix C) and you are currently only funded for a part-time Coordinator, this NOFO will increase your part-time position to a full-time position (from .5 to 1), unless you submit a Part-Time Loss Acknowledgement letter with this NOFO application. This is not a change from FY21 but a reminder.
- **Funding Priority Categories: In the previous NOFOs we offered three funding priority categories, which were Category 1:** Renewal Funding for Eligible Applicants; **Category 2:** Increases from Part-time to Full-time Positions; and **Category 3:** Increases in Funding Amount. In this NOFO, for FY22, subject to your eligible request and available funds:
 - Category 1 – Renewals - will be to fund you to the amount to which you were last funded for your Baseline Positions.
 - Category 2 – Renewals - If you serve at least 25 participants (according to the PIC report in Appendix C) and you are currently only funded for a part-time Coordinator, this NOFO will increase your part-time position to a full-time position (from 0.5 to 1), unless you submit a Part-Time Loss Acknowledgement letter with this NOFO application.
 - Category 3 – Renewals - will be to increase your funding, up to your Maximum Annual Award (or approved Exception Request) or Eligible Funding Request, whichever is less. See Appendix C and Section V.B.3.
 - Category 4 will fund New grantees (applicants not funded in FY19, FY20 or FY21).
- **FY23 Funding Priorities for applications that came in with the FY22 NOFO cycle as well as any applications that are submitted in any supplemental opening of this NOFO.**
 - Category 1 – Renewals - will be to fund you to the amount to which you were last funded for your Baseline Positions.
 - Category 2 – Renewals - If you serve at least 25 participants (according to the PIC report in Appendix C) and you are currently only funded for a part-time Coordinator, this NOFO will increase your part-time position to a full-time position (from 0.5 to 1), unless you submit a Part-Time Loss Acknowledgement letter with this NOFO application
 - Category 3 – Renewals - will be to increase your funding, up to your Maximum Annual Award (or approved Exception Request) or up to your Eligible Funding Request, whichever

is less. See Appendix C and Section V.B.3.

- Category 4 will fund New grantees (applicants not funded in FY20, FY21 or FY22).
- **Salary Comparability Information:** In previous NOFOs, applicants were asked to submit salary comparability information with their application. Under this NOFO, as with FY21, salary comparability information is NOT required. Instead, salary information will be taken from the U.S. Bureau of Labor Statistics (BLS) locality pay data, with 40 percent added for fringe benefits.
- **Unexpended Funds:** Any unexpended funds will be recaptured and used to make future grants. This was the same in FY21 and FY20 but is a change from FY19.
- **Unexpended Balance Explanation.** If you did not expend at least 60 percent of your last FSS award during its Period of Performance, you MUST submit an Unexpended Balance Explanation to your local Field Office as a condition of your award. This letter must explain why your last grant was not fully expended and how you plan to change your operations to ensure that this award is right-sized and will be fully expended. This application requirement is indicated in Appendix C under the column labeled “Unexpended Balance.”
- **Revised HUD-52651 under this NOFO:** This NOFO will not require the HUD-52651 for Renewal applicants, as has been the case in recent FSS Renewal NOFOs. Instead, the relevant fields where HUD needs information from Renewal applicants have been indicated in the instructions in Section IV.B. and are to be completed on the SF-424. This is not a change from FY21, but a reminder. However, the HUD-52651 form has been revised and IS required for New Applicants.

All New applicants must include at least three partners that are currently participating or will be participating in your future Program Coordinating Committee. Information will be captured on form HUD-52651 in space number nine (#9). Applicants must include the name of each organization and the name, email address and phone number of a point of contact at that organization who, if contacted, would confirm that they are currently working with the applying entity on the FSS program or are committed to working with the applying entity if the applicant is successful in being funded for this grant.

- **Amount Requested, Annual Cost Adjustment, Baseline Annual Award, Baseline Funding per Position, Base- line Renewal Positions, Baseline Two-Year Award, First-Year Funding Request, Largest Renewal Award, Last Renewal Award, Last Renewal Positions, Maximum Annual Award, Maximum Expansion Positions, Maximum Two-Year Award, Multifamily Contract Number, Multifamily Quarterly Report, Number of FSS Participants, Second-Year Funding Request:** Please see Program Definitions IV.B. for information on these terms. The funding formula has changed from the FY21 and FY20 NOFOs, which means *applicants must do the math* to calculate their Maximum Two-Year Funding Request. *Please pay close attention to the new definitions and calculations to request the appropriate funding amount for the appropriate number of positions.*
- **Exception Request, Part-Time Loss Acknowledgment & Renewal Period:** Please see Program Definitions IV.B. for information on these terms and the process to submit an Exception Request or Part-Time Loss Acknowledgment, if desired. This is not a change from FY21, but a reminder.
- **Each applicant must apply with a unique TIN and UEI number:** This year, HUD will not be accepting DUNS numbers but will require a UEI number instead. For PHA applicants, as before, no more than one application will be accepted from any one TIN or UEI number. For PHA applicants, HUD will treat multiple applications from one UEI as duplicates and only review the last application received and validated by HUD. This is not a change, but a reminder. PBRA applicants, multiple applications from the same Multifamily Contract Number (PBRA HAP Contract Number) will be treated as duplicates. HUD will only review the last application received and validated by HUD.

2. Eligibility

Q.1: Is there an opportunity for new applicants to be funded under this NOFO? Are previously unfunded FSS programs (or programs that were funded more than 3 years ago) eligible for new funding?

A.1: Yes, PHAs that have not been funded for an FSS grant in any of the last 3 years (FY21, FY20, FY19) and PBRA owners already implementing or wishing to implement an FSS program are eligible for funding under Category 4 of this NOFO.

Q.2: What if my PHA is not in Appendix C, but I believe it should be eligible?

A.2: You may submit a “Request for Review of Eligibility,” recommended at least one week prior to the application deadline, as described in Section III.A.3:

“If you are not listed in Appendix C, but believe you meet the eligibility criteria or are listed incorrectly, you must submit a Request for Review of Eligibility via email to fss@hud.gov.

The subject line should be “FSS FY22 NOFO: Review of FSS Eligibility – [PHA/Organization Name and PHA Number/Multifamily Contract Number].” HUD cannot guarantee the timely review of such requests if submitted less than one week prior to the application deadline.”

Q.3: Why is the Target Period listed as January 1, 2021, to December 31, 2021?

A.3: The Target Period is the timeframe used to determine the Number of FSS Program Participants, as defined in Section I.A.4, “Program Definitions.”

Please note that this is *different* than the Period of Performance, which for this NOFO is “January 1, 2023 – December 31, 2023.”

Q.4: Do I need to serve Public Housing residents to be eligible for funding?

A.4: No. Housing Choice Voucher (HCV)-only PHAs can still apply as Renewals or as New applicants. This NOFO also will accept applications from Project-Based Rental Assistance (PBRA) Multifamily Housing applicants for the first time due to now being included as eligible entities for funding in the FSS Final Rule. All Multifamily applicants will be in the “New” category.

Please note, the Public Housing Family Self-Sufficiency program and the HCV Family Self-Sufficiency Program were merged in FY14. Since then, any FSS program has been able to serve Public Housing and/or HCV, at the discretion of the local PHA. As of FY15, PBRA owners have been able to run FSS programs, but not able to apply for FSS funding. PHAs have been able to serve RAD-Affected Multifamily FSS participants with grant funds (assuming both the PHA and the PBRA owner have an approved FSS Action Plan and there is a Cooperative Agreement in place.) With this NOFO, Multifamily owners are able to apply for funding for the first time.

Q.5: My PHA is planning to reposition some or all of our Public Housing to Project-Based Rental Assistance (PBRA). Am I still eligible to apply?

A.5: Yes. Funds awarded under this NOFO may be used to serve residents of Project-Based Rental Assistance (PBRA) Multifamily Owners regardless of whether they were RAD-affected. Previously, only RAD-affected PBRA residents could be served using NOFO funding.

From NOFO Page 24: Please Note – PHAs that have repositioned all of their Public Housing stock in which FSS participants resided and do not serve HCV FSS participants are not eligible to apply for funding under this NOFO as renewal applicants, as, when their current funding ends, they will no longer meet the definition of “currently administering an FSS program.” For example, your PHA has 60 PH units and no vouchers. You have 18 FSS participants. You reposition all the PH units where those 18 FSS participants live (for instance, you use RAD to convert all your family units to PBRA and all your FSS participants lived in family units.) Due to the RAD notice, you can continue using your FY21 FSS NOFO funding through 12/31/22. However, you no longer have a PH FSS program and you do not serve HCV FSS participants. After 12/31/22, your PHA will no longer administer an FSS program (even if you, as the PBRA owner, are serving those RAD-affected FSS participants). Thus, you are not eligible for renewal funding under this FY22 NOFO.

Q.6: Do I need to complete Mandatory FSS Training to be eligible?

A.6: Yes, but this is not a requirement for APPLICATION. It is required to be completed by the time funding is made available (1/1/23).

From the NOFO - All FSS grantees must review HUD's Online Guidebook that provides guidance on how to develop and administer a successful FSS program and complete the online training. We anticipate that the online training will be available in October. Please ensure that you are on the FSS mailing list While we recommend that all FSS Coordinators take the training and familiarize themselves with the Guidebook, the requirement is that at least one person from each grantee must complete the NEW FSS online training. According to Section III.A.1, "Mandatory FSS Training:"

"HUD will pull a list of all individuals that have received credit for completing the training from [HUD Exchange](#) at the time of grant award. If you are not on the list generated at the time of grant award, all FSS grant funds for your grant will be held by your Field Office until proof of course completion is submitted to your Field Office.

Even if completed the old training prior to the FY2022 awards, you must complete the NEW online training once it is available (which will be prior to award availability). You are not required to submit documentation of compliance with this NOFO application."

Q.7: I am a HUD-assisted (Public Housing, Housing Choice Voucher, or Multifamily Housing) resident. Can I enroll in the FSS program through this NOFO?

A.7: No. This NOFO is only for PHAs and PBRA applicants. If you are a resident of Public Housing or have a Housing Choice Voucher or a multifamily/PBRA site, you can ask your PHA/owner to see if they offer the FSS program and to enroll if they do. You can find contact information for your local PHA here: https://www.hud.gov/program_offices/public_indian_housing/pha/contacts.

Q.8: Do applicants need to go through Grants.gov or is there another way to apply to this NOFO?

A.8: Submission is required for all applicants by the application due date. All applications must go through Grants.gov. There is NO OTHER WAY. Anyone planning to submit applications on behalf of an organization must register at Grants.gov and be approved by the E-Biz POC in SAM to submit applications for the organization. Registration for SAM and grants.gov is a multi- step process and can 10 business days (two weeks) or longer to complete if data issues arise. Applicants without a valid registration cannot apply through [Grants.gov](https://www.grants.gov). Complete registration instructions and guidance are provided on [Grants.gov](https://www.grants.gov).

Q.9: Would a non-profit Tribal Housing be eligible to apply for this opportunity if they partnered with a Housing Authority?

A.9: No. Only PHAs and PBRA owners may apply for this NOFO and only recipients of Section 8 and Section 9 rental assistance may be in the FSS program. NAHASDA recipients are not eligible participants.

From the NOFO - Tribe/TDHEs Eligibility: Indian Housing Authorities (IHAs) are not eligible for funding under this NOFO since the Native American Housing Assistance and Self Demonstration Act of 1996 does not allow HUD to enter into new Annual Contributions Contracts (ACCs) with IHAs after September 30, 1997.

Q. 10: (We received several versions of this question.)

- We are going to be writing the "Renewal" for our FSS grant. However, after reading the final rule, we were wanting to know do we go ahead and include our current multifamily units in the renewal or is it a new application?
- There is a lot of confusion regarding how PBRA will apply for the NOFO. Am I, as the person that will be applying for our renewal funding, also requesting new funds for our PBRA program/owners or does each PBRA owner need to apply on their own? Will it all be in one application or multiple applications?

- Our Housing Authority currently administers an FSS program for Public Housing and the HCV Program and has for many years. Now that Multifamily can now join the program, we have a Multifamily project (tax credit RAD Conversion) that we would like to administer the FSS program for. We did have the Public Housing FSS program at the time of the RAD conversion and had grandfathered FSS participants from Public Housing FSS into multifamily in the year 2019. So when we apply for the funding, would it be a renewal application or a new application since we are now adding multifamily into it and have not administered an FSS program with Multifamily for several years and only administered a program for Public Housing and HCV?
- As a statewide PHA, we have a PBRA program that does not currently have FSS but would like to implement one. It is unclear on how to apply for the FSS Coordinator Grant funding for them. We, as PHA for our HCV program, will be applying for FSS Coordinator Grant Renewal Funding but I am not sure how to, or if we should, apply on behalf of the PBRA program, or if the PBRA owners will be applying on their own -
 - 1 - Will we, as PHA, be requesting funding for new multifamily programs or will the owners be applying individually? If we are to do it, would it be a single application (I know only one can be submitted under our UEI#)? How would that be done? Would the PBRA owner be a joint applicant?
 - 2 – Once our PBRA team implements a multifamily FSS program, will the owners each be creating their own FSS Action Plan or would they be required to follow our recently approved FSS Action Plan?
- I have submitted the FSS grant application for our PH and HCV Program. I am in the process of completing the FSS grant application for our MF Program. Per the SF424 instructions, Question 8 b-c, each application should have a unique UEI and TIN numbers. I entered our TIN and the UEI was the same one that is on my PH and HCV FSS grant application. How do I resolve this issue? I know that if I submit the MF FSS grant application our PH and HCV FSS grant application will not be reviewed so I didn't want to submit it until I resolve the issue with the UEI number. Also, we have a total of five MF properties that I will be submitting an FSS Grant application for.

A. 10: If you are a PHA on Appendix C, you may apply as a renewal. There is nothing special in the application that you need to do in order to continue serving your RAD-affected PBRA FSS participants and you may also now serve non-RAD-affected PBRA participants.

Please note that in order for the PHA to serve PBRA participants, both the PHA and the PBRA owner must have an approved FSS Action Plan AND there must be a cooperative agreement in place between the PHA and the PBRA

owner. You are not required to submit these with your application, but they are still requirements.

If the PBRA owner ALSO wants funding, the PBRA owner must apply for their own separate funding. If awarded, the PBRA owner could sub-contract to a PHA, but in that case, there would be two grants and each grantee would be responsible for their minimum number of participants separately (not double-counting).

Consider these scenarios:

1. The PHA could apply for renewal funding. With that funding, the PHA will be able to serve any multifamily residents (not just RAD-affected, as was the limitation prior to the Final Rule.)
2. The multifamily/PBRA owner could apply as a new applicant and, if funded, could sub-contract with the PHA to serve the PBRA residents.
3. The multifamily/PBRA owner entity could apply for separate funding and run their own separate FSS program.
 - In all cases, the multifamily owner would need to have or create an approved FSS Action Plan.
 - In scenarios 1 and 2, you would need to have a cooperative agreement between the owner and the PHA. This isn't required to be submitted in the funding application, but it is required for the PHA to serve PBRA residents (and always has been).

Please Note: Residents of straight tax credit units are not eligible to participate in FSS. If they are tax credit/voucher units, they would be eligible by virtue of the HCV.

Q. 11: The NOFO States that joint applicants can “maintain current joint applicants or may change the composition of the joint applicants to remove any member(s) or change a co-applicant to a lead applicant (or vice-versa).” (Page 29) If a prior FSS applicant would be considered a renewal as a Joint Applicant, but the prior Co-Applicant is not able to continue with the joint application, does this mean that an applicant can retain their Renewal status even if they are the only, lone remaining member of the original Joint Application, but instead have added a new Co-Applicant that was not present for the original FSS award?

A. 11: Yes. As long as a PHA was part of a single or joint application that was funded in the last three years, they still retain their Renewal status. So, if PHA A and PHA B were joint applicants funded in FY21 and now PHA B is no longer seeking funding, PHA A may still apply alone and/or may add a different co-applicant. That co-applicant must have an approved FSS Action Plan. Please note, the participant count from PIC will only include those PHAs actually on the application. If a new co-applicant is added, we will query PIC to determine the number of participants during the target period at the new co-applicant PHA. We will subtract the number of participants that were credited to the

non-applicant PHA. For FY22, this is not relevant due to the “grace year” on minimum number of participants, but it will be relevant in the future. Please also note that any FSS participants at the “dropping out” PHA must continue to be served until their CoPs are complete regardless of whether the PHA is funded or not.

Q. 12: (We received several versions of this question.)

- **Our HA is a current FSS grantee and we’re in the process of RAD. We have not closed on our loan and we’ve not started construction. Should we apply as a renewal or new applicant? I didn’t see this specific scenario listed in the FY 2022 NOFO.**
- **Can PHAs with federal family housing under RAD/redevelopment status apply for the FSS NOFO for Section 8 recipients? In additional, federal family housing is not expected to begin conversion until at least 2025 so would it be possible to apply to serve these families?**
- **Can a PHA under a CHAP agreement apply for the FY22 FSS Grant?**
- **Since each RAD-converted PBRA is a single-asset, would the RAD-converted PBRA properties be considered part of our PHA, or would they be a new participant?**
 - **If they are part of our PHA, could we enroll new participants at the RAD-converted properties?**
 - **If they are new participants, would each of our RAD-converted PBRA properties have to apply separately as new participants? Could they submit one joint application separate from the PHA? We have over 25 RAD-converted properties, and one full-time grant writer.**
 - **Alternatively, could our RAD-converted properties apply as joint applicants as part of the PHA’s application?**

A. 12: Even if you convert to RAD PBRA during CY23, you can still serve RAD-affected PBRA residents after conversion. You’d have to establish a cooperative agreement with the PBRA owner once the conversion happens. Then, next year, this provision might apply...

From the NOFO - Please Note – PHAs that have repositioned all of their Public Housing stock in which FSS participants resided and do not serve HCV FSS participants are not eligible to apply for funding under this NOFO as renewal applicants, as, when their current funding ends, they will no longer meet the definition of “currently administering an FSS program.” For example, your PHA has 60 PH units and no vouchers. You have 18 FSS participants. You reposition all the PH units where those 18 FSS participants live (for instance, you use RAD to convert all your family units to PBRA and all your FSS participants lived in family units.) Due to the RAD notice, you can continue using your FY21 FSS NOFO funding through 12/31/22. However, you no longer have a PH FSS program and you do not serve HCV FSS participants. After 12/31/22, your PHA will no longer

administer an FSS program (even if you, as the PBRA owner, are serving those RAD-affected FSS participants). Thus, you are not eligible for renewal funding under this FY22 NOFO.

Q. 13: Are families with Tenant Protection Vouchers are eligible for FSS program.

A. 13: Yes. TPVs are a type of HCV.

Q. 14: If a PHA has signed forms HUD 52621A and Part II HUD 52621B, and the developments are considered PBV, are they eligible for FSS funding as a multifamily development?

If a PHA has signed forms HUD 52620A and Part II HUD 52620B, and the developments are considered PBRA, are they eligible for FSS funding as a multifamily development?

A. 14: PBV is different from PBRA. PBV is a type of Housing Choice Voucher. PBV is not considered Multifamily/PBRA.

If a PHA has converted via RAD to PBRA, the PBRA owner entity (which is legally separate from the PHA) could apply as a PBRA owner.

Q. 15: Q: Which Multifamily (PBRA) properties are eligible to apply for this NOFO?

A. 15: Any property with a Section 8 Housing Assistance Payments contract (also known as the Project-Based Rental Assistance or PBRA program), pursuant to 24 CFR Parts 880, 881, 883, 884, and 886, is eligible to apply for this NOFO as an applicant for new funding. See page 23 of the NOFO and 24 CFR § 887.105, *Basic requirements of FSS programs*, for more information on eligibility. Additionally, following the regulations, Section 202 and Section 811 properties are not eligible to operate FSS programs, and therefore ineligible for FSS NOFO funding. ***Note that HUD is unable to verify the eligibility of a potential PBRA applicant.***

Additionally, PBV (project-based voucher) programs are not PBRA programs. FSS programs at PBV properties are administered through PHAs.

Q. 16: The NOFO says PBRA properties that are troubled (have a risk rating of 1-3) are ineligible to apply. How can I tell if my property is troubled?

A. 16: The Property's Owner/Agent can reach out to their Account Executive to confirm their risk rating and they will be provided that information. Properties are not proactively notified of their risk rating but may be aware due to additional requirements placed on troubled properties such as Monthly Accounting Reporting submission/review requirements.

Q. 17: For FSS programs, and the PIC count for the prior program period (the figure which will eventually show in Appendix C), is this information that is reported in PIC by the PHA during the final annual report? What specific information does a PHA need to report to HUD ensure the most accurate count possible for future continuation of their FSS

A. 17: From the NOFO

Number of FSS Participants is the total number of Eligible Families under an FSS Contract of Participation during the target period. The total Number of FSS Participants under an FSS Contract of Participation includes any FSS families with enrollment, progress, or exit report(s) during the target period. For public housing participants, FSS families who have ported their assistance to another jurisdiction during the target period will be counted for both the initial and receiving PHA. If you are administering an FSS Contract for a family that has ported to another PHA, you must ensure that your PHA code is in field 17d of the HUD-50058 form in order to receive credit for that FSS family. For more information about FSS PIC reporting, see PIH Notice 2016-08.

Q. 18: In reading the NOFO, it states that we can submit a joint application with other PBRA owners. If we have 4 family properties within one county that are owned by different LLCs and would be serviced by 1 FSS Coordinator, my understanding is that we can apply with one property as the primary applicant and then list the 3 other locations as joint applicants, correct? They are each owned by their own LLC and have different HUD Contract numbers.

A. 18: Yes. You would need cooperative agreements between the lead applicant and joint applicants, and each property would need an approved Action Plan. Note that regardless of the number of joint applicants, all new applicants are only eligible for one position.

Q. 19: For joint applications with PBRA owners, the NOFO states that the properties should be “nearby” geographically to be considered on a joint application. Is there a required distance that we need to use for the determination of “nearby”?

A. 19: There is no required distance for nearby, as it is not defined under the NOFO. It could reasonably be expected that the Program Coordinator could have knowledge of/relationships with the service providers that would serve all anticipated participants. Additional considerations would include whether or not the properties could be served by the same PCC.

Q. 20: Do new applicants have to have enrolled participants before they apply? If so, do they have to submit documentation of the number of participants they have enrolled with the application?

A. 20: No. and No.

Q. 21: Is there a reason there is a decrease for us from FY21 to FY22 in the local salary?

A. 21: The Bureau of Labor Statistics conducts their own data gathering and analysis. Please request what you actually need.

Q. 22: I used the U.S. Bureau of Labor Statistics (BLS) locality data to find the median salary for the job title “Social Work: Other” for our entity’s zip code. It shows the state and U.S. median per hour rate, but the data displays “N/A” for our targeted entity’s zip code. Do I use the state’s median hourly rate then? The state’s median hourly rate is higher than the minimum hourly wage of \$15.

A. 22: Yes. And then request what actually you need.

3. Application

Q.1: What forms are required as part of my NOFO application?

A.1: Two forms are required for ALL applicants, while others are only required for SOME applicants, depending on your situation. You can find the full list of forms, assurances, and certifications in Section IV.B.1.

Here is a summary of required, optional, and non-accepted forms:

- **ALL Applicants**
- **SOME Applicants**
 - ▶ HUD-52651: FSS Program Coordinator Funding
 - NOT required or considered for RENEWAL applicants under the FY21 NOFO
 - ▶ SF-LLL: Disclosure of Lobbying Activities (if applicable)
 - ▶ Exception Request letter
 - ONLY if requesting an exception
 - use the Attachments form that can be found with the Optional Forms in your Grants.gov application
 - ▶ Part-Time Loss Acknowledgement letter
 - ▶ ONLY if you are Category 2 Eligible and do NOT want an automatic increase to the next full-time position
 - ▶ use the Attachments form that can be found with the Optional Forms in your Grants.gov application
- **Documentation to Confirm the Correct # in PIC (Section IV.B.1.a)**
 - ▶ ONLY required if your PHA is Moving to Work (MTW)
 - ▶ May be submitted if your PHA served Project-Based Rental Assistance (PBRA) families affected by the Rental Assistance Demonstration (RAD)
- **HUD-2993: Acknowledgment of Application Receipt**
 - ▶ Only if you have a waiver of electronic submission AND want receipt confirmation for your hard-copy (paper) application

Q.2: What needs to be in an Exception Request letter?

A.2: The requirements for an Exception Request letter are stated in Section I.A.4, Program Definitions. It should be “signed by your PHA’s Executive Director explaining the need for a higher funding amount.”

- As a reminder, you CANNOT submit this to us via email. You MUST submit an Exception Request using the Attachments form that can be found with the Optional Forms in your [Grants.gov](https://www.grants.gov) application.

Q.3: What needs to be in a Part-Time Loss Acknowledgement letter?

A.3: From the NOFO - 4c: The requirements for a Part-Time Loss Acknowledgment letter are described in Section I.A.4, “Program Definitions.” It should include a signed attestation from your Executive Director that acknowledges you will be funded for FEWER positions (rounded DOWN to the nearest full-time position) than you are eligible for.

As a reminder, you CANNOT submit this to us via email. You MUST submit an Exception Request using the Attachments form that can be found with the Optional Forms in your Grants.gov application.

Q.4: Does my Authorized Organization Representative (AOR) have to be my PHA Executive Director or PBRA Multifamily Owner?

A.4: Not necessarily. The AOR should be your PHA Executive Director, PBRA Owner, or some other designated PHA or PBRA official authorized to make contractual agreements on behalf of your agency, including submitting applications via Grants.gov.

The AOR is defined in Section I.A.3.a, “Standard Definitions” as: “The person authorized to submit applications on behalf of the organization via Grants.gov. The AOR is authorized by the E-Biz point of contact in the System for Award Management. The AOR is listed in item 21 on the SF- 424.”

The AOR should review and sign the SF-424 before it is submitted, as described in Section IV.B.2.b, “SF-424:”

“Question 21 – The Authorized Representative listed on the SF-424 of your application should be the Executive Director of your organization, or some other designated official of your organization who is authorized to make contractual agreements on behalf of your agency. This person should review and sign the grant application before it is submitted. Any changes to the Authorized Representative will delay award processing.”

Q.5: How do I amend my already submitted application?

A.5: You can submit a new application before the application deadline, and we will only evaluate your last submitted application, according to Section IV.D.1, “Amending or Resubmitting an Application:” “Before the submission deadline, you may amend a validated application through [Grants.gov](https://www.grants.gov) by resubmitting a revised application containing the new or changed material. The resubmitted application must be received and validated by Grants.gov by the applicable deadline. If HUD receives an original and a revised application for a single proposal, HUD will evaluate only the last submission received by [Grants.gov](https://www.grants.gov) before the deadline.”

Q. 6: Do we put two years of funding in 18a on the SF-424 even though the project is for one year 1/1/2023-12/31/2023? Baseline for Year 1 Plus Baseline x 5% COLA for Year 2 Total on line 18a

A. 6: From the NOFO

Question 17 – applicants should indicate January 1, 2023-December 31, 2023 (however, this is an estimate and the actual dates will be determined at grant agreement).

PLEASE NOTE: This NOFO may be used to award funding for FY22 and FY23, at HUD’s discretion, pending sufficient and allowable future funds. Therefore, to receive funding for both fiscal years through this application, please enter your requested FY22 (CY23) funding in Line 18a (federal) and enter your requested FY23 (CY24) funding, including any Annual Cost Adjustment, in line 18e (other). The form will TOTAL your separate FY22 and FY23 funding requests on line 18g.

However, the reality is, the dates entered into Question 17 have no bearing on funding.

Q. 7: Under Threshold Eligibility Requirements > 2. Affirmatively Furthering Fair Housing, It states the “Application must discuss how the applicant will carry.....” do we need to have this as part of our submitted application?

A. 7: No.

Q. 8: SF-424 Question 8. E., what do you mean by Organizational Unit (Dept. name and Division name)?

A. 8: It’s not a mandatory field. If it doesn’t apply, leave it blank.

Q. 9: SF-424 Question 15, under Descriptive Title of Applicant's Project, do we put Family Self-Sufficiency Program? We are not applying with joint applicants nor have multiple joint applicants.

A. 9: From the NOFO –

Question 15 – if you are applying with joint applicants, you must enter the joint applicant's PHA number or PBRA contract number and legal name in this field on the 424. For multiple joint applicants, separate each with a comma then space. ***A project title is not required.***

Q. 10: Form 52651- For question # 2, do you mean entity's name when you say M.F. owner name?, Question # 3, when you ask for M.F. contract #, do you mean the PBRA HAP Contract Number?

A. 10: Question #2. Yes – the PBRA ownership entity. Question #3. Yes – the PBRA HAP contract number.

Q. 11: Can we apply for the FSS grant before we get our final action plan approved?

A. 11: Yes, the updated FSS Action Plans must be approved by HUD by November 14. Action Plans must be submitted by September 30, 2022, in order to allow HUD time to review by November 14. As long as you submit by that date, you will be considered in compliance unless/until your Plan is deemed not acceptable. At that time, you will need to make the required changes by the date indicated.

Q. 12: On the Applicant/Recipient Disclosure Report in the FSS grant application: #4 Amount of HUD assistance- is this the amount requested for only FY22 or is this the total requested for 2 years as is reflected on the SF-424?

A. 12: Include the amount for CY23 only.

Q. 13: Assurances: Read only, I assume I don't do anything but include the form in the transmission of grant?

A. 13: Add your Organization and the title of your AOR (the person who signs the grant application, officially, if they are not automatically filled in already. The form is then "signed" upon submission.

Q. 14: I'm having trouble using Grants.gov or with registrations, etc. Can HUD help?

A. 14: From the NOFO

Grants.gov Customer Support. Grants.gov provides customer support information on its website at <https://www.grants.gov/web/grants/support.html> . Applicants having difficulty accessing the application and instructions or having technical problems can receive customer support from Grants.gov by calling (800) 518-GRANTS (this is a toll-free number) or by sending an email to support@grants.gov. The customer support

center is open 24 hours a day, seven days per week, except Federal holidays. The phone number above may also be reached by individuals who are deaf or hard of hearing, or who have speech disabilities, through the Federal Relay Service's teletype service at (800)-877-8339.

Q. 15: Can you provide more information about the program specific reporting requirements that are mentioned on pg. 51 of the NOFO for PBRA? It says “PBRA grantees will be required to submit annual reports to their HUD Account Executive or Resolution Specialist using the Multifamily Reporting Tool” – what is the multifamily reporting tool?

A. 15: Per federal regulations (found at 24 CFR § 984.401 *Reporting*), all FSS programs are required to submit annual reports to HUD, regardless of whether they are funded by HUD. All funded PBRA programs will need an updated action plan, will need to submit escrow reports to HUD, and will need to submit an annual report 30 days after the end of HUD's fiscal year (i.e. October 30th of each year). The multifamily reporting tool is one part of the annual reporting required, and can be found under the “Asset Management Quick Links” section of the [HUD Multifamily website](#), together with the required program contract of participation and escrow worksheet. More information about the requirements for annual reporting will be communicated to program operators as needed.

4. Positions

Q.1: How are Baseline Positions calculated?

A.1: Program Definitions can be found in Section I.A.4, including Baseline Positions:

- For New Applicants, the number of baseline positions requested will be 1.
- For Renewal Applicants, this is your Last Renewal Positions, with all part-time positions where the applicant has served at least 25 participants in the Target Period rounded up to a full-time position UNLESS you submit a Part-Time Loss Acknowledgment.

Q.2: Is HUD funding new full-time positions in this NOFO? How can I request additional positions beyond what's in Appendix C?

A.2: In this renewal NOFO, HUD is funding both renewal and new positions, with new full-time positions for FY 2023 only available for Categories 2 and 4, in accordance with Section III.B.3, "Funding Priority Categories:"

- Funding Category 2 – Increases from Part-time to Full-time Positions.
 - ▶ In the second round of funding, we will fund Category 2 Eligible applicants for your Maximum Positions (except where a submitted Part-time Loss Acknowledgment letter is approved) based on the per-Baseline Position funding rate from Category 1."
- Funding Category 4 – Single-Year Funding for New Applicants.
 - ▶ In the fourth round of funding, all eligible applications for NEW funding will be entered into a lottery. We will review the pool of eligible applicants any may adjust the lottery to ensure that the percentage of PHA and PBRA awardees are representative of the applicant pool.

Q.3: Do I need to submit Documentation to Confirm the Correct Number of FSS Program Participants During the Target Period?

A.3: As described in Section IV.B.1.a, "HUD will no longer accept documentation to correct the number of FSS families as shown in the PIC report in Appendix C. However, applicants in the limited cases specified below must continue to submit documentation of the number of FSS program participants so that HUD may accurately determine funding eligibility.

- An MTW PHA
- A PHA that serves RAD-PBRA families in your FSS program, AND believes that these families are not reflected in the PIC report

- is requesting more positions than the PIC data support (as shown in the PIC report under the “number of FSS coordinators supported by PIC data” column)

Q.4: What if I do not believe that the information in Appendix C is accurate? Should I be concerned if our PIC Data is highlighted in yellow?

A.4: If you believe that there is an error in Appendix C, you may let us know at FSS@hud.gov. You should note that under Section IV.B.1.a, “Documentation to Confirm the Correct Number of FSS Program Participants During the Target Period: HUD will no longer accept documentation to correct the number of FSS families as shown in the PIC report in Appendix C.” However, under Section I.A.4, “Program Definitions,” this would not affect your “Number of FSS Service Coordinators Supported by PIC Data,” since “HUD will not use 2020 PIC counts to limit your Baseline Positions.” Even though you cannot and do not need to submit a correction to your PIC Data, we have highlighted in yellow PIC Data that otherwise would be ineligible for funding without the grace year for COVID-19. If your PHA’s PIC Data is highlighted in yellow, please take this opportunity to reference PIH Notice 2016-8 and work with your PIC Coach to ensure that your FSS reporting in PIC is correct for the future.

- Link to PIH Notice 2016-8 and the associated webinars are, located under the header for PIC Reporting: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/fss/
- Link to PIC Coaches, including a current list with contact information: https://www.hud.gov/program_offices/public_indian_housing/systems/pic/help

Q. 5: Can I request more positions than my Baseline Positions in Appendix C?

A. 5: No.

Q. 6: If my “Number of Positions Supported by PIC” on Appendix C is more than my “Baseline Positions” on Appendix C, can I apply for my Number of Positions Supported by PIC?”

A. 6: No. You may not request more positions than your “Baseline Positions.”

Q. 7: If we apply for less than the Baseline Annual Award, will we still be funded for the number of positions listed in Appendix C?

A. 7: Unless you submit an Exception Request to reduce the number of positions for which you are applying, we will assume that your requested funding will go to support the number of positions for which you are eligible.

Q. 8: There seems to be some uncertainty from multifamily owners about the new NOFO and how to apply for the funding. It is only one application *per owner*, or one application *per FSS Action Plan*? We have some multifamily partners who have FSS Action Plans for each of their sites. If it is per site, do sites have to have at 25 enrolled in order to apply for the 1 FTE?

A. 8: It's one application per site. The sites do not have to have the participants already enrolled, but the minimum number of participants per Coordinator is 25, so the applicant would have to expect that they could enroll 25 participants within the first year of the grant, if funded. Sites can apply jointly (through cooperative agreements, with each site needing its own approved Action Plan) if they will not be able to meet the 25 enrolled participants criterion.

Q. 9: When a PBRA Owner submits a joint application for multiple properties served by a single FSS coordinator – do we need to complete a separate SF 424 and Form 2880 for every property listed on HUD 52651? If not, can we select any site to complete SF 424 and Form 2880? Or is there suggested hierarchy for how the lead site is selected?

A. 9: One 2880 per application.

5. Awards

Q.1: How are Baseline Award and Maximum Award determined? Under what circumstances would I need to submit an Exception Request?

A.1: As outlined in Section 1.A.4, “Program Definitions:” Your Baseline Award is the higher of your:

1. Most recent FSS award you received during the Renewal Period (for purposes of this NOFO, this includes awards from FY21, FY20, and FY19 new, renewal, and supplemental NOFOs); and
2. Your Baseline Positions multiplied by your Baseline Funding per Position.

Your Maximum Annual Award is your Baseline Award + 10%. This is NOT listed in Appendix C, so you MUST do the math yourself if you want to request up to your Maximum Award. You may include a Second-Year Cost Adjustment (up to 5%) as part of your Second-Year request without submitting an Exception Request.

If you want more than your Maximum Award, you MUST submit an Exception Request.

You may request more funding but NOT more positions.

Baseline Positions

NOTE: Please consider your actual FSS funding needs, which may be LOWER than your Baseline Award, as any unexpended funds will be recaptured if not used during the Period of Performance (CY 2023).

Q.2: What is the basis for my Baseline per Position in Appendix C? Does the Baseline Award include fringe benefits, or do I need to add it in? What if I think there is an error with the U.S. Bureau of Labor Statistics (BLS) data?

A.2: Your Baseline per Position is based on BLS data for your zip code (or state, as appropriate) from your last application on record, with 40 percent added for fringe benefits, as defined in [Section 1.A.4](#), “Program Definitions:”

“The Baseline Funding Per Position is based on U.S. Bureau of Labor Statistics data ([www.careeronestop.org/ Toolkit/Wages/find-salary.aspx](http://www.careeronestop.org/Toolkit/Wages/find-salary.aspx)) for the median salary for the job title ‘Social

Worker: Other' in your zip code (the zip code provided in your last application on record, except for state-wide PHAs, which will use the state level data), with a 40 percent allowance added for fringe benefits. This amount (salary AND fringe) is presented in Appendix C in the column titled 'Baseline per Position.'"

If you believe that there is an error in Appendix C, you may let us know at FSS@hud.gov.

Q.3: Do I have to request my Baseline Award? What if my Baseline Award is more than is needed based on my local pay scales? What happens if my Amount Requested is more than what I actually use in CY 2023?

A.3: No, your Amount Requested does not need to be the same as your Baseline Award. You can request any amount up to your Maximum Award without submitting an Exception Request.

You may already be fully funded for your positions at the level of your last NOFO award. You may, however, have greater needs or higher pay scales than could be fully funded from past NOFO awards.

Therefore, PLEASE consider your actual FSS funding needs for your Amount Requested.

You should note that under [Section I.A.2](#), "the period of performance for this NOFO is January 1, 2023 – December 31, 2023," and **"any unexpended funds will be recaptured and used to make future grants."**

Q.4: Can I request funding above my Baseline Award? Do I need to submit additional documentation to request more than my Maximum Award?

A.4: Yes, your Amount Requested may be greater than your Maximum Award, but you must submit – and we must approve – an Exception Request, as described in [Section 1.A.4](#), "Program Definitions:"

"Please Note: You do NOT need an Exception Request to request above the Baseline Award unless you are requesting more than your Maximum Award. If you would like to be funded for MORE than the Maximum Award, you must include with your application a letter signed by your PHA's Executive Director explaining the need for a higher funding amount. See Section IV.B. for information on how to submit an Exception Request."

Q.5: Does an Exception Request change my Baseline or Maximum Award?

A.5: No, submitting an Exception Request (see [FAQ A6b](#) above) does not change your Baseline or Maximum Awards, which are defined in [Section 1.A.4](#), "Program Definitions."

Regardless of whether we approve your Exception Request, we will first fund your Amount Requested up to your Maximum Award.

We will only fund Exception Requests, to the extent they are approved, after all applicants are funded up to their Maximum Awards first.

If you submit an Exception Request, please be sure to reflect the full amount you are requesting on the SF-424 Question 18. We can always fund you LESS than you request on the SF-424, but we can't fund you MORE.

Q.6: Is there a cap on the salary request for the FSS Coordinator in the funding grant for 2023?

A. 6: Ultimately, the only cap on salaries is that it can't be more than \$176,300 per position.... However, if you are requesting more than your Maximum Per Position, you must include an Exception Request Letter.

Q. 7: We received several similar questions

- If my "Baseline Annual Award" is more money than I need to provide salary and fringe including a training stipend to my Baseline Positions, can I ask for that much anyway and use the rest to hire more coordinators?
- If we have grant money left from our award and our Maximum positions funded were 4 could we hire a 5th position? If we have the number of FSS participants for that position to serve.
- I have a question regarding the FY22 Family Self-Sufficiency NOFO. I read on page 22 of the NOFO that the "minimum and maximum total award amounts will vary depending on the number of coordinators, PIC data, PBRA Quarterly Reports, and amount last funded." Is the Baseline Annual Award from Appendix C the minimum amount we can apply for?

A. 7: No. *ONLY REQUEST THE AMOUNT YOU NEED IN ORDER TO PROVIDE SALARY AND FRINGE TO THE NUMBER OF POSITIONS (max 40 hrs./wk. each) FOR WHICH YOU ARE FUNDED.*

Q. 8: Can we ask for more than our Last FSS Award in the Renewal Period? If yes, how does that work with Funding Priority Categories?

A. 8: Yes. If you ask for more than you were last funded, we would consider the amount you were last funded in Round 1. Then, in Round 3, we would consider your additional request. Please note, you **MUST** include your **FULL** request on the SF-424 Question 18.

Q. 9: The content of NOFO does not address direct costs, such as a computer, printer, and internet needed by the FSS Coordinator. Can this be included in the budget?

A. 9: No. Please review the section on Eligible Expenses.

Q. 10: We are working on the renewal for our FSS grant and have questions re: the computing of salaries: Re: Category 1 and Category 3 Category 1: Renewals state it will fund to the amount to which you were last funded for your base line positions Category 3: Renewals will be to increase your funding up to your max annual award Question: What are prerequisites for increasing funds?

A. 10: Ask for up to what you need, but only what you need.

Q. 11: Can we include a training stipend as part of our fringe benefit? Is there a maximum? Can we include travel? Do we have to get the training activities approved? Could we use that for memberships to industry organizations that support FSS, coaching, etc.?

A. 11:

- Yes! You may include a training stipend as part of your fringe benefit.
- No, there is no maximum.
- Yes, you may include travel. Please see the Eligible Expenses section of the NOFO.
- No, you do not have to get the training approved, but please see the eligible expenses section of the NOFO.
- Yes, the training stipend can be used to pay for a membership to an industry group that supports FSS and related skills.

Travel & Training	Training Stipend as part of Fringe Benefits – this may include costs of training or collaboration PERTAINING TO FSS OR SERVICE COORDINATION	The training stipend CANNOT be used for training that is NOT directly related to the management of the FSS program, service coordination, coaching/case management. (For example, FSS training stipend CANNOT be used to train an FSS coordinator in standard housing functions in place of other PHA funds that would normally serve that purpose.)
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Q.12: I'm a renewal PHA. Do I have to complete the HUD-52651 form?

A. 12: No.

Q. 13: I can't find Appendix C. Where is it? It's not attached to the NOFO this year.

A. 13: Please note that APPENDIX C is available as a separate document this year. The Appendix C can be found along with the NOFO in the Instructions Download zip file on a [Grants.gov](https://www.grants.gov) as a separate document. It can also be found on the [HUD Funds Available Page](#).

Q. 14. Can the service coordinator we already have in place add the FSS coordinator responsibility to herself and get the FSS funding as well? Or is it required to hire a person just for the FSS coordinator position?

A.14: The FSS Program Coordinator position is a full-time position (Maximum 40 hours/wk), so if that person already has a full-time job, they could not take on another full-time job.

Q. 15: For the FSS grant this year, I am a little confused about first year funding. Are we able to increase any amount up to the max baseline or is it 10% above what we requested last year.

A. 15: There is no 10% limit over last year.

Q. 16: Can I request the same amount as last year for 2023 without an increase? Then request 5% increase for following year 2024?

A. 16: Yes, if that's what you need.