

Older Adults Home Modification Grant Program

Frequently Asked Questions

April 12, 2021

Program Requirements & Applicant Eligibility

Question: Is the \$30 million restricted regionally? Is it available nationally? Only in certain states?

Answer: Per Section I.A.1. Purpose. The \$30 million available for this program has no geographic restrictions and is available nationally. However, 50% of the federal award will be set aside for substantially rural areas.

Question: Are Public Housing Authorities eligible to apply?

Answer: Per Section III.A. Eligible Applicants. While a PHA is not a traditional recipient of this type of funding, there are some PHAs with portfolios that include owner-occupied units; thus, they are an eligible applicant. If your PHA does not service owner-occupied units, it is not eligible for funding under this grant program.

Question: Is it \$30M to spread over 3 years or \$30M each of the 3 years (i.e., \$90M)? In other words, can a proposal ask for \$1.25M a year for 3 years or is it \$1.25M to be spread over 3 years?

Answer: Per Section II.D. Period of Performance. The \$30 M is to be spread out over the 36-month (3 year) period. The maximum award amount for an individual grant is \$1.25M to be expended over 36 months.

Question: Where do we go to see if our area is eligible?

Answer: You may propose any target area in your application. All U.S. communities are eligible under this program, and whether an applicant is located in a substantially rural community or an urban community (which, for this program, includes suburbs that are not substantially rural) is not a consideration for award. The only limitation for HUD in making awards is that at least \$15 million (out of the \$30 million available overall) are available to grantees that will serve communities that are substantially rural.

Per Section V.A.1.a., Rating Factor 2.(a)(1). Urban/rural area designation. You must describe the target area as either substantially rural or urban, using the Substantially Rural Community Lookup Tool located at https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps/oahmp that is linked to a list of states, counties, county subdivisions, or places and their urbanized area/substantially rural designations based on Census 2010 data. HUD will not accept applications unless the target area(s) is designated as either being substantially rural or being urbanized. The target area, however, may be comprised of more than one U.S. Census-defined county, county subdivision, or place.

Question: Are CDBG entitlement geographies excluded from this funding?

Answer: No, CDBG entitlement geographies are not excluded from this funding.

Question: Is this grant available to non-profit organizations that work in New York City?

Answer: Per Section III.A. Eligible Applicants. Yes, this grant is available to non-profit organizations that work in New York City and other cities and states across the nation.

Question: Can municipalities apply for a block of funds for residents or does each senior have to apply individually?

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Answer: Per Section I.A.1. Purpose. The municipality (and similarly for a state, county, public housing agency, or nonprofit organization) must apply for the HUD funding—minimum \$500,000 and maximum \$1.25M—and develop a program for administering grant funds to conduct modifications in the homes of eligible older adults within their jurisdiction that apply to the local program. The grantee, and not HUD, deals with residents.

Question: Can one proposal include a rural and urban component, or do you prefer each proposal to commit to one or another geography?

Answer: Per Section V.A.1.a., Rating Factor 2.(a)(1). Urban/rural area designation. A single proposal must be predominantly urban or predominantly rural but may include both components. The applicant is to designate under which of the two categories it is applying. Target areas must be identified using the Substantially Rural Community Lookup Tool located at https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps/oahmp

Question: Does the nonprofit have to have 3 years' experience in providing home modifications/referrals to a contractor for modifications, or 3 years' experience working with older adults who may have mobility issues and could benefit from the program?

Answer: Per Section III.A. Eligible Applicants. Eligible applicants include experienced nonprofit organizations, states and local governments public housing authorities that have *at least 3 years of experience in providing services to elderly persons*. Applicants must satisfy the threshold requirements contained in Section III for their application to be considered.

Question: The link to access HUD's Opportunity Zone Census Tract(s) in the NOFA and OZ Certification Form 2996 seems to be broken. Is there another place that we might be able to access information on the designated Opportunity Zones for this NOFA?

Answer: We will work on fixing HUD Form 2996 and/or the link 2996 to the US Department of the Treasury. In the interim, here is the official information about designated Opportunity Zones:

<https://www.irs.gov/credits-deductions/businesses/opportunity-zones>

Find Qualified Opportunity Zones

Low-income communities and certain neighboring areas, defined by population census tracts, can qualify as Opportunity Zones. States nominate communities for the designation, and the U.S. Department of the Treasury certifies that nomination.

Find Qualified Opportunity Zone locations by census tract.

- [Designated Qualified Opportunity Zones under Internal Revenue Code § 1400Z-2 - Notice 2018-48 PDF](#)
- [Amplification of Notice 2018-48 to Include Additional Puerto Rico Designated Qualified Opportunity Zones - Notice 2019-42 PDF](#)
- [Map of Designated Qualified Opportunity Zones](#)

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Letters of Support

Question: Does the Older Adult Homes Modification grant require letters of support? If not, does it help in the grant selection?

Answer: Letters of support are welcome, but not required, are not part of the review process, and do not affect the likelihood of an award.

Administrative Costs & Staffing

Question: What is the Administrative cap for this grant? What does it cover?

Answer: Per Section III.F.27. Administrative Costs. You can utilize up to 10 percent of the federal award for payments of reasonable grant administrative costs related to planning and executing the project, preparation/submission of HUD reports, etc. There are two categories of administrative costs: direct administrative costs and indirect costs. For the purposes of this grant, all direct administrative costs and all indirect costs count towards the 10 percent administrative cost limit. Please see page 24 of the NOFO, Administrative Costs section, for more details.

Question: What is the difference between the Program Manager and the Project Director? Can both roles be held by one person?

Answer: Per Section V.A.1.a., Rating Factor 1.(1). The Capability and Qualifications of Key Personnel. A Project Director oversees the entire award and ensures compliance with all requirements, streamlines the overall process, coordinates contracts and services, helps develop program assessment tools, and other duties as assigned. Typically, a Project Director dedicates 5-10 percent of their time to the award. A Program Manager will oversee day-to-day operations and must be experienced in occupational therapy, housing rehabilitation, aging in place modifications, or other work related to the project. The Program Manager must have demonstrated project management experience and must dedicate at least 50 percent of his/her time for the proposed project. Both roles cannot be held by one person.

Question: We are a housing authority. We already have a project manager. Do we still have to hire a Project Manager specific for this grant?

Answer: No, you do not have to hire another Program Manager if the current one meets all the qualifications outlined in Section V.A.1.a., Rating Factor 1.(1)—The Capability and Qualifications of Key Personnel—and dedicates at least 50% of their time to this grant program.

Question: How quickly does HUD normally reimburse the work? Since this method may be disadvantage for some rural communities, who may not have the ability to put up the fund first?

Answer: HUD typically reimburses for eligible costs 5-7 business days after the request is submitted if it provides the required information accurately and HUD does not have questions about it.

Occupational Therapist (OT)

Question: How is the occupational therapist paid? Through the grant as project expense?

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Answer: Per Section III.F. 11.a. Scope of Home Modifications. The OT may be staff or procured via a contract. The expense is considered a direct cost and should appear in the appropriate line item in your Form HUD-424-CBW-Budget Worksheet.

Question: Do we have 60 days to hire the OT? Is the OT salary a direct cost?

Answer: Yes, the OT salary is considered a direct cost and you have up to 60 days to hire the OT (including contracting for OT services) along with other staff required for the success of this project.

Home Assessments

Question: Is there flexibility in using a "Certified Aging-in-Place" Specialist completing the assessment, then having the assessment and Scope or Work reviewed by the OT?

Answer: Per Section III.F.14.c. Program Services Model. It is allowable to have the home assessment and modification plan (e.g. Scope of Work) completed by a licensed OT assistant or certified Aging-in-Place Specialist; however, the assessment and proposed modification plan must be reviewed and approved by a licensed Occupational Therapist prior to initiating work in a unit. We strongly encourage programs to use an OT to conduct a client-focused assessment, as supported by published research on fall prevention and home modifications for aging-in-place (see the Background section I.A.1 of the NOFO, which describes this research).

Question: Are CLIP certified professionals able to complete home assessments, with an approved signature from an OT?

Answer: This answer assumes CLIP stands for Certified Lead Implementer Professional. A CLIP could only conduct the home assessment (reviewed and approved by an OT) if they are also a Certified Aging-in-Place Specialist. We strongly encourage programs to use an OT to conduct a client-focused assessment, as supported by published research on fall prevention and home modifications for aging-in-place (see the Background section I.A.1 of the NOFO, which describes this research).

Question: Who/when/how assigns the occupational therapist before conducting a home assessment?

Answer: Per Section V.A.1.a., Rating Factor 1.(1). The Capability and Qualifications of Key Personnel. The Program Manager is responsible for day-to-day operations, as such they will assign the OT to conduct a client/home assessment.

Question: Are there specific standardized assessments HUD prefers that OT uses for home assessment, or is that up to the grantee to decide?

Answer: Per Section III.F.14.d. Program Services Model. At least one standardized assessment tool shall be used to collect information before and after the home modification intervention. At a minimum, the assessment tool(s) shall cover the functional abilities of the client and/or the safety and hazards in the home. OTs are also trained to conduct client-focused assessments that consider the client's functional abilities and goals.

The grantee may use their preferred assessment, but HUD reserves the right to require the use of one or more standardized tool as part of the evaluation process.

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Unit Modifications-Eligible Projects & Cost Limits per Unit

Question: Do all repairs need to be completed by a contractor or can volunteers do some of the work?

Answer: Per Section III.F.14.c. Program Services Model. Licensed (or in accordance with local and state regulations) contractors must complete all modifications and repairs. If the local or state law does not require licensure for home modification work, the applicant should just state that all work will be done in accordance with local or state regulations.

Question: Per the NOFA, each home repair project cannot exceed \$5,000, without approval from HUD. Does the \$5,000 include all costs, such as indirect costs, admin costs, costs of the Occupational Therapist and direct costs of materials and labor?

Answer: Per Section III.F.11.a. Scope of Home Modifications. No, the \$5,000 per home cost only applies to the direct costs of materials and labor involved in the home modification project, it does not include the salary of the OT, OT Assistant or Certified Aging-in-Place Specialist.

Question: Does it help to have CAPS Contractor? (Certified Aging-in-Place Specialist)

Answer: Per Section III.F.14.c. Program Services Model. Licensed (or in accordance with local and state regulations) contractors must complete all modifications and repairs.

Question: Can the licensed contractor be a nonprofit?

Answer: Yes, the licensed contractor can be a nonprofit.

Question: How about cost for decluttering or help with hoarding issues?

Answer: A small amount of decluttering would be an allowable cost if it represents a safety hazard or is necessary for implementing home modifications; however, hoarding is a chronic condition that requires intervention beyond the scope of this program. See Appendix B for a list of home modifications and repairs.

Question: Are well and septic replacements included as eligible projects?

Answer: These would be eligible projects using funds that remain after modifications identified by the occupational therapist assessment are completed and other health and safety hazards are addressed. You should be aware that these projects would require an environmental review by HUD. If well or septic system replacements cause the overall direct project cost for the home to exceed \$5,000, the grantee must obtain approval in advance to perform the additional work. (This is true of any change in the scope of work for a home.)

Question: How does HUD determine the \$5,000 per unit amount cap?

Answer: The \$5,000 per home amount is not a cap (a maximum allowable amount) for direct cost for an individual home; it is an average grantees need to meet for all units addressed by their program overall. For example, if a grantee receives \$50,000 to complete modifications in homes of older adults, they can address issues in 10 homes based on an average direct cost of \$5,000 per home. There may be instances where direct modification costs in one home totals \$3,000 and another totals \$7,000; addressing issues

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in both homes does not change your average cost per home (i.e., \$5,000). However, the grantee would need to obtain approval in advance to perform the work on the home with a total cost of \$7,000.

This per unit average was based on our understanding that research has shown that low-cost aging in place home modifications (i.e., The Johns Hopkins University's CAPABLE program interventions are capped at \$1,300) were effective in improving the functional abilities of seniors with the desire to provide additional funding to address other health and safety hazards in the home. Another important consideration was that grantees use grant funds to provide benefits to as many low-income senior households as possible. The Notice of Funding Opportunity is explicit about the program-level cap to implement Congress' directive that this program be a "low barrier" one; if a prospective applicant does not wish to follow the notice's requirements, it should revise its approach to work under this program or consider looking elsewhere for funding for the different type of work it is interested in doing.

[Question: Regarding lead paint-if a home is identified as having a lead hazard, would lead paint remediation be an eligible repair under this program?](#)

Answer: The goal of the home modification program is to enable low-income elderly persons to remain in their homes through low-cost, low barrier, high impact home modifications to reduce older adults' risk of falling, improve general safety, increase accessibility, and to improve their functional abilities in their home.

Per Section IV.G.2. Lead Based Paint Requirements. When providing housing assistance funding for purchase, lease, support services, operation, or work that may disturb painted surfaces, of pre-1978 housing, you must comply with the lead-based paint evaluation and hazard reduction requirements of HUD's lead-based paint rules (Lead Disclosure; and Lead Safe Housing (24 CFR part 35)), and EPA's lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)). A lead risk assessment of the home for lead-based paint hazards is required for a Home Modification project exceeding \$5,000, but it is not a required part of the development of a project of \$5,000 or less. In those lower-cost projects, only paint testing for lead of paint that will be disturbed by the project is required. Paint that is found to be lead-based paint and will be disturbed must be dealt with using lead-safe work practices, and repaired after the disturbance. If the amount of disturbance is more than the minimal amounts in the Lead Safe Housing Rule (2 square feet per room inside, or 20 square feet outside, or 10% of small areas, such as window sills), the paint-disturbing work must be done by an EPA- or State-certified lead renovator, and the project must pass lead clearance before the family can reoccupy the area.

Leveraging Funds

[Question: If an OT is already being paid by Medicaid or Medicare, can they work with us on projects funded by this grant?](#)

Answer: Yes, but you must check with Medicaid to ensure compliance with their program. Additionally, you cannot charge both programs for the OT's services.

[Question: Can funding from this grant be leveraged with existing CDBG funds?](#)

Answer: Yes, the funding can be leveraged with CDBG or funds from other eligible sources; however, the different funding streams must be separately tracked by the grantee.

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Income Eligibility for Program Participants

Question: What is the income guideline for eligible homeowners?

Answer: Per Section III.G. Criteria for Beneficiaries. The beneficiary must be low income—family income less than or equal to 80% of local area median income (AMI) (see below). Because the AMI low income determination under criterion 3 above is based on jurisdiction in which the residence is located, family income and family size, (see www.huduser.gov/portal/datasets/il/il20/IncomeLimitsMethodology-FY20.pdf (and later editions in subsequent years – check the Income Limits home page at <https://www.huduser.gov/portal/datasets/il.html>), the total family income, not just the income of the homeowner(s), will be used to determine the low income eligibility.

For 2020 and the first part of 2021, the income limits for low-income households are shown for each part of the country at www.huduser.gov/portal/datasets/il/il20/Section8-IncomeLimits-FY20.docx, and are based on the number of persons in the household. For determining income eligibility in subsequent years, see HUD’s Income limits website (as of the publication of this NOFA, at www.huduser.gov/portal/datasets/il.html), which will list the income limits and the income limits methodology for that year.

HUD will inform grantees when the income limits change annually; this usually occurs in the Spring.

Question: Is income based on Household or just the eligible client 62 years or older?

Answer: Per Section III.G. Criteria for Beneficiaries. Total household income, not just the income of the homeowner(s), will be used to determine the low-income eligibility.

Question: What are guidelines for documenting income of beneficiaries?

Answer: Per Section V.A.1.a., Rating Factor 3.b. Fiscal Oversight and Financial Strategy Narrative. Prospective applicants should describe how they plan to verify beneficiary income in the application. If awarded, a grantees income verification process should become part of their program’s policies and procedures and implemented accordingly and consistently. Applicants may want to research programs in their area servicing similar populations and adopt or modify existing guidelines.

Question: Can the home qualify if the home is owned by the adult child of the older adult?

Answer: No, the home is not eligible if it is owned by the adult child under 62 years old of the older adult. See Section III.G. Criteria for Beneficiaries for home ownership requirements.

Environmental Reviews

General Comment: Per Section V.B.15. Environmental Requirements. Environmental Reviews are required if federal funds are used in whole or in part, unless all activities are in the maintenance column. So, if you use leverage funds to do rehab work in right column, then an environmental review is still required.

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Question: As a non-profit home rebuilding organization, we routinely perform Rehab/Repair work that is already funded through grants, contracts, and donations. Can we serve people under OAHMP simultaneously with other funders, so that we can do things like roof replacement without going through the HUD Environmental Review process?

Answer: Per Section V.B.15.c. Repair/Rehabilitation. Grantees may not segment activities comprising a proposed project to circumvent an environmental review. All anticipated/contemplated activities that are geographically, functionally, and/or logically related must be aggregated (considered together as a whole) and an environmental review prepared on that aggregate project, regardless of funding sources (or the order of rehab activities).

Question: We would provide the necessary non-aging-in-place repairs (i.e., roofing, electrical, plumbing) and THEN provide the repairs paid for in this grant. Does that require a HUD environmental review if we do the "heavy" repairs FIRST?

Answer: Per Section V.B.15.c. Repair/Rehabilitation. All anticipated activities that are geographically or functionally/integrally related, regardless of funding source, require an environmental review. The order of implementation of the rehab activities has no bearing on whether an environmental review is required or not. In the case of the OAHMP, HUD is responsible for completing the environmental review under 24 CFR part 50. Grantees are prohibited from committing or spending HUD or non-HUD funds on projects proposed to be done under their HUD grant prior to HUD completing the environmental review and approving the work.

Question: Can the Public Housing Authority prepare the environmental review?

Answer: Per Section V.B.15.c. Repair/Rehabilitation. No, all grantees will be responsible for providing HUD with requisite materials and documentation with which HUD will use to complete the environmental review.

Question: Can you confirm that 24 CFR Part 58 would be applicable as well to complete the environmental evaluations under this new program?

Answer: Per Section V.B.15. Environmental Requirements. No, the OAHMP grant requires HUD to complete the environmental review under 24 CFR part 50 Protection and enhancement of environmental quality. Under HUD's regulations, a single project associated with both a Part 50 program (like OAHMP) and Part 58 program (like HOME, CDBG) would generally require separate environmental reviews under each part. However, under 24 CFR 58.11(c), HUD may determine that it will perform one Part 50 environmental review for both programs if performing an additional Part 58 review is not feasible in the time allotted. HUD must ensure that the Part 50 review considers the full scope of all activities associated with all programs. This may require reevaluating the Part 50 or 58 review if it has already been completed.

Question: If we are able to request funding for more repairs/rehab items than maintenance items, it is understood we would need to do a Section 106 review on each home. Would there be a tier 1 environmental review requirement at time of application?

Answer: A tier 1 environmental review is not required at the time of application. If selected for award, additional instructions regarding environmental reviews will be provided by HUD.