

## Jobs Plus FAQ

### **Q1. Why must PHAs meet the following requirements in order to be eligible?**

#### **Criteria for Eligible Developments**

- **Minimum development size of 250 households (excluding elderly-only households)**
- **At least 50 percent of the households (excluding elderly-only households) contain no member showing earned income in PIC**
- **Because Jobs Plus is a place-based program, units to be served must be within a ¼ mile radius of each other. This requirement may disqualify developments on the Eligible Development list if the AMP is for scattered sites that are not within the required radius.**

A1. Jobs Plus pilot is intending to replicate a demonstration program that is place-based and requires a “critical mass” so for at least this first year, the minimum number of units in the “place” is 250 within a ¼ mile radius. Many smaller communities have expressed interest. HUD may be considering modifying the model in future rounds, should Congress appropriate funding.

### **Q2. The NOFA states: All applicants must include a map showing the minimum number of eligible households within a ¼ mile radius. Scale and radius must be marked on the map. Can you clarify?**

A2. Put a dot in the center of your proposed development and draw a circle with a ¼ mile radius (1/2 mile diameter). Applicants do not need to identify each unit within the circle, but must show that the minimum number of eligible units are represented within the circle. The reason for this requirement is to show “place.” Some AMPs are scattered site, so while they may be on the eligible list due to number of non-elderly families and unemployment in the AMP, they may not meet the “place” requirement. The opposite may be true for smaller AMPs that might not meet the 250 unit requirement, but when combined together, do, in reality, meet the requirements of “place.”

### **Q3. The NOFA states, “Jobs Plus grant dollars enable grantees to leverage other local, state and federal resources to catalyze significant change in employment outcomes for public housing residents. Federal sources are generally not allowed to be used as match or leverage unless otherwise permitted by that program’s authorizing statute.” Which federal sources are allowed?**

A3. Other than language in the NOFA, HUD does not express a legal opinion on the eligible uses of other federal agencies’ program funding. Each applicant is responsible to ensure, with their partner, that the committed funding is eligible for the committed use.

### **Q4. When we get to devising outcomes, who do we count as eligible for work? How does Jobs Plus deal with the parent who is taking care of a disabled child? How does Jobs Plus deal with the young adult disabled? What are the expectations?**

A4. The Rating Factor for Need indicates:

- 1) Provide a socio-economic and demographic description of the residents residing in the target site. **Include the number of work-able adults (people between 18-64 who are mentally and physically able to**

become employed) and the current rate of unemployment (individuals and households reporting zero earned income on their latest rent re-certification.)

“Work-able” is how we are defining who we are intending to target for Jobs Plus.

**Q5. What if there are more than one separately named “complexes” within one development – can we serve all of them?**

A5. Yes, as long as they are contiguous and are shown on the map as meeting the “place” requirement of at least 250 eligible units within a ¼ mile radius.

**Q6. We already have a rent incentive program through our rent reform demo or MTW authority. Do we have to use JPEID?**

A6. JPEID must be offered to all participants. Other incentives may be used, but may not be paid out of Jobs Plus funds.

**Q7. Funding for JPEID will come from Jobs Plus appropriations – this will be a 4 year budgeted item to cover the rental loss from participants in the program?**

A7. Yes, just as PHAs are “made whole” for the rental loss from regular EID, the JPEID will come from the grant and the future Op Fund request will be modified to reflect that the PHA already received funds from the Jobs Plus grant to cover the rent incentive.

**Q8. Employment-Related Services & Community Support Work, including staffing, services administration and technical assistance may be paid for by funding available from the ROSS program... Does this mean the PHA has to apply to the ROSS program for extra funding to take care of the budget for these services?**

A8. These two components may be paid out of ROSS or Jobs Plus funds. The up-to-\$3million grant will be made up of Jobs Plus and ROSS funds. HUD will determine the split. There is no extra ROSS application required and whether or not the applicant already has a ROSS grant is not a factor in determining eligibility. HUD already reserved some of the ROSS appropriation (\$9m) and added it to the Jobs Plus appropriation (\$15m) for the total of \$24m that is available under the Jobs Plus NOFA.

**Q9. What are we supposed to do with the in-kind services provided as match or leverage?**

A9. Per the NOFA:

In addition to employment, training and educational supports, grantees will have the flexibility to provide other supportive services based on resident needs and local capacity. HUD expects that all services that are generally available to residents of the community will be leveraged in-kind from

partners. Grant funds should only be used to procure services that are *not* already available (either by service type or amount).

**Q10. Is there any flexibility in the eligibility criteria? Why can't smaller developments apply?**

A10 The size and proximity requirements are intended to reflect a desire to replicate the demonstration that was shown to be effective. There is some consideration being given to changing the requirements in the future to allow for smaller developments, however, the place-based nature of the program is intrinsic to the model.

**Q11. Is it HUD's expectation that all service providers being paid with grant funds be procured in accordance with 24 CFR 85? Does this include the WIB/AJC/One-Stop with whom we will have an MOU?**

A11. Yes, 24 CFR 85 (as amended by 2 CFR 200 starting December 26, 2014) applies the same to the Jobs Plus grant as to any other HUD funds granted to a PHA. The MOU requirement does not suggest either a contractor or subgrantee relationship. So, any grant funding provided by the PHA to a WIB or AJC would be a procurement transaction, and would have to meet 24 CFR 85. Once the procurement regulations are satisfied by the PHA, then the WIB or AJC would not be subject to these procurement regulations for any procurement that they perform unless HUD would determine that the PHA exercises significant decision making functions for the WIB or AJC (in an effort by the PHA to avoid compliance with Part 85/200).

**Q12. The Chart in the Program Section of the NOFA indicates that the HUD-2880 is "if applicable" but the General Section says that it's required. Which is it?**

A12. All applicants must complete and submit the HUD-2880 form with their application.

**Q13. The NOFA says that I can target a sub-population. Do I have to serve everyone in the development?**

A13. You must offer services to everyone (all ACC units) in the development(s) for which you are funded. The main target is Work-Able (aged 18-64 who are physically and mentally able to become employed) but services should not be withheld from seniors or people with disabilities who would like to participate. The program may be tailored toward a sub-group (women, young adults, etc.) but participation must be offered to all in the development(s).

**Q14. If I have a mixed development (i.e. Public Housing, Project Based and Tax Credits) is everyone in the Development eligible for Jobs Plus?**

A14. No, only residents residing in ACC units can be enrolled in the program. If there are services incidental to the program on-site (e.g. A job fair) other residents could participate, but due to the authorizing language, only residents on conventional public housing may be enrolled, have grant funds pay for their services and benefit from the JPEID.

**Q15. One of our eligible developments is slated for RAD conversion soon. Can we still apply for Jobs Plus to serve that development?**

A15. This is a good question and one that is not addressed in the NOFA. If you are on the eligible list, you may apply, however, as of this time, the Jobs Plus funds may only be used to serve residents of conventional public housing (ACC) so once a property is converted to PBRA or PBV, you could no longer use Jobs Plus funds to serve the residents.

**Q16. We have an FSS program, do we have to use JPEID? Can JPEID be used to fund escrow?**

A16. JPEID must be offered to all participants. Other incentives may be used, but may not be paid out of Jobs Plus funds. Note that the use of JPEID would function similarly to EID or flat rent with an FSS family – if the rent does not increase, the family does not escrow. A family who is already enrolled in FSS would not have to accept JPEID if they chose to continue with escrow instead.