



U.S. Department of Housing and Urban Development

Office of Housing Counseling

Notice of Funding Availability (NOFA) for the Department's Fiscal Year 2015 Supplemental Comprehensive
Housing Counseling Grant Program

FR-5800-N-33

for Laura M. Mann

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Commissioner and Acting Assistant Secretary for Housing

3/27/15

Date

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Housing Counseling Grant Program

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U.S. Department of Housing and Urban Development

Program Office:	Office of Housing Counseling
Funding Opportunity Title:	Notice of Funding Availability (NOFA) for the Department's Fiscal Year 2015 Supplemental Comprehensive Housing Counseling Grant Program
Announcement Type:	Initial
Funding Opportunity Number:	FR-5800-N-33
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Date for Applications:	May 7, 2015

This NOFA provides information and instructions for the FY 2015 Supplemental Comprehensive Housing Counseling Grant Program. This NOFA is comprised of both the General Section to the Department's FY 2014 NOFAs for Discretionary Programs (General Section) published **February 19, 2014**, and this program section to the NOFA. In addition to the application requirements set forth in this document, Applicants must also comply with the requirements established in the General Section, and all Housing Counseling Program requirements. FY 2015 grants to be awarded under the NOFA are contingent upon the availability of funding.

Additional Overview Information:

1. Incorporation of the General Section. HUD publishes a General Section each fiscal year that contains *mandatory requirements* for all applicants to HUD's competitive grant programs including this NOFA. Applicants must meet all of the requirements of the General Section in addition to the requirements of this NOFA to be considered and to receive funding. The full title of the General Section is General Section for Fiscal Year 2014 Discretionary Programs. It can be found on Grants.gov and on HUD's Funds Available webpage at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail.

2. OMB Approval Number(s): 2502-0261

I. Funding Opportunity Description.

A. Program Description and Requirements.

1. Program Description. The purpose of HUD's Housing Counseling Grant Program is to provide funds that shall be used for providing counseling and advice to tenants and homeowners, both current and prospective, with respect to property maintenance, financial management and literacy, and such other matters as may be appropriate to assist them in improving their housing conditions, meeting their financial needs, and fulfilling the responsibilities of tenancy or homeownership. Funding provided by this NOFA is intended to support HUD-approved housing counseling agencies to respond flexibly to the needs of residents and neighborhoods, and deliver a wide variety of housing counseling services to homebuyers, homeowners, renters, and the homeless. This NOFA plays an integral role in the continued stabilization of our nation's housing market by helping individuals and families obtain housing and stay in their homes through responsible homeownership or affordable rental housing. Traditionally underserved populations such as minorities, the elderly, veterans, persons with disabilities, persons with limited English

proficiency and residents of rural areas, face unique housing and economic challenges. HUD's Comprehensive Housing Counseling Grant Program funds housing counselors who provide expert, unbiased guidance and information to help families and individuals meet their housing needs and improve their financial situations. Moreover, HUD grants assist housing counselors to act as an important safeguard against scams and discrimination, and to act as an important gateway to local, state, federal and private housing assistance and resources.

2. Objectives and Priorities of this NOFA. The Congress, Administration and other program stakeholders have identified several priorities for the Housing Counseling Program that this NOFA addresses, including but not limited to:

- a. Distribute federal financial support to housing counseling agencies for them to provide quality services to consumers to address their housing and financial needs.
- b. Distribute federal financial support to housing counseling agencies based on past performance and quality of housing counseling services.
- c. Reduce the administrative costs to program participants when applying for and reporting on HUD funding while maintaining essential tracking of program performance and accountability for federal funds.
- d. Leverage external resources and funding to increase the sustainability of quality housing counseling programs.
- e. Ensure high quality housing counseling services by preparing the housing counseling industry for additional HUD counseling standards and individual housing counseling testing and certification expected to be implemented in FY 2015.
- f. Ensure adequate distribution of funding amounts for rural areas having traditionally low levels of access to housing counseling services, including areas with insufficient access to the Internet.

3. Procedural Changes. In order to improve communication, streamline program requirements, reduce administrative burdens and prepare for additional program standards, HUD has made a significant procedural change to the application process for this NOFA and will continue a number of changes implemented under previous Comprehensive Housing Counseling NOFA competitions.

a. Limited Eligibility for FY 15 Supplemental Housing Counseling NOFA. Eligible applicants for this FY15 Supplemental NOFA are limited, with certain exceptions as described in Section III.A. of this NOFA, to HUD-approved Housing Counseling Agencies and State Housing Finance Agencies that were not awarded FY 2014 comprehensive housing counseling funds through the FY 2014 – 2015 Comprehensive Housing Counseling Grant Program NOFA (FY 2014 – 2015 NOFA).

Agencies that were awarded FY 2014 funds through the FY 2014 – 2015 NOFA are not eligible for this FY15 Supplemental NOFA, except under limited circumstances described in Section III.A of this NOFA. As described in the FY 2014 – 2015 NOFA, HUD will use the applications received under the FY 2014 - 2015 NOFA, and the corresponding scores and funding methodology relevant to the FY 2014 - 2015 NOFA, to make awards to such agencies for FY2015, utilizing FY 2015 appropriations. Grantees that received FY 2014 housing counseling funding through the FY 2014 – 2015 NOFA will be contacted by HUD to determine their interest in FY 2015 funding. HUD will then rerun the FY 2014 funding formula, utilizing FY 2014 application data and scores, should FY 2015 funding become available, for those FY 2014 grantees that express interest and remain eligible. Doing this will enable HUD to make awards quickly after FY 2015 appropriations become available, and significantly reduce the application burden for counseling agencies. The General Section for FY 2014 will govern both the FY 2014 and FY 2015 comprehensive housing counseling grant funds.

b. Continuation of Previously Implemented Procedural Changes:

i. Offsetting Expected Counselor Certification Costs. As Applicants should be aware, sections 106(e) and (f) of the Housing and Urban Development Act of 1968 (12 U.S.C. §§

1701x(e) and (f)) requires the Department to test and certify housing counselors. HUD has published a proposed rule related to these requirements. *See* 78 FR 56625. The timing of a final rule and its implementation date is unknown. However, should the timing overlap with the availability of funds under this NOFA, Applicants should be aware that expected training, testing and certification expenses are eligible expenses under this NOFA. The funding methodology contains a layer of funding based on the number of the Applicant's full-time equivalent (FTE) housing counselors. This change was made not only to improve the methodology with which HUD determines award amounts, but also to make sure award amounts are made in a manner consistent with the intent to help counseling agencies offset expected certification costs.

ii. Recognition of Quality of Housing Counseling Services. The scoring and funding methodology for this NOFA is intended to enable grantees to meet the program goal of building agency capacity to provide a flexible range of services to address a wide variety of housing and financial needs, especially in response to recent economic and housing conditions. Scoring under this NOFA will reward high-quality services, oversight and quality control, participation in HUD-sponsored housing counseling-related research and pilot programs, meeting key needs, and efficient program administration. HUD will require all Applicants to identify distribution of funds among sub-grantees and branches at the time of application based on percentages of the grant rather than dollar amounts. In addition, only sub-grantees and branches that directly provide housing counseling services should be listed in the application. In other words, sub-grantees or branches that perform administrative functions only should not be listed as sub-grantees. Further, an Intermediary or State Housing Finance Agency (SHFA) may not fund a sub-grantee at 100% of the sub-grantee's budget. HUD will view the list of sub-grantees identified in the Applicant's application as final. If after the grants are awarded an Applicant would like to change its submitted list of sub-grantees, the grantee must make the request of HUD in writing and provide detailed justification for the request.

iii. Encouraging Counseling Networks. HUD will provide increased support for Intermediaries, SHFAs and Multi-State Organizations (MSOs) that manage networks of housing counseling agencies or branches, in other words, that sub-allocate funding to sub-grantees and branches. Specifically, this NOFA is structured to encourage such agencies to expand their network, and encourage Local Housing Counseling Agencies (LHCAs) and other agencies to form new partnerships to gain access to additional resources and cost savings. This NOFA permits the funding of a sub-grantee's branches. However, to receive a base award under the funding methodology for this NOFA, a branch office must be open to provide housing counseling services to minimum of thirty (30) clients per year. In addition, this NOFA will provide support based on the number of FTE counselors in a network. HUD counseling grants will be structured to provide grantees that manage networks of counseling agencies with additional resources to ensure quality, accountability, technical assistance support and information technology support for their respective networks.

HUD continues to encourage networks with HUD-approved Intermediaries and SHFAs for several reasons. First, HUD recognizes the important role that housing counseling networks can play in improving the quality of housing counseling, for example by facilitating knowledge and sharing best practices. Second, HUD is determined to take steps to decrease the size of the application, reporting and other program administration work load burdens on housing counseling agencies in an effort to maximize the impact of housing counseling resources on the consumers of housing counseling services. HUD also wants to cooperate more effectively with SHFAs given the increasingly important role they are playing in the housing counseling field. Most applicants should be familiar with this counseling network funding model, as a similar approach has been used to distribute National Foreclosure Mitigation Counseling (NFMC) funding. To help facilitate the partnering of LHCAs with Intermediaries and SHFAs, Appendix A provides contact information for Intermediaries and SHFAs that participate in HUD's Housing

Counseling Program as of the NOFA publication date.

To encourage Applicants to increase the size of their counseling networks, the funding methodology for this NOFA incorporates a flat award per sub-grantee and branch (of the Intermediary, SHFA or Multi-State Organization [MSO]) included in an application.

iv. Significant Funding Methodology Changes. While network size/number of sub-grantees remains as a significant funding factor, this NOFA's funding methodology places slightly decreased weight on network size in order to increase weight on other criteria such as score, number of FTEs, network management activities and other relevant criteria.

v. Grant Request Amount. HUD will not require grant amount requests or grant budgets at the time of application. However, HUD will require submission of the actual revenue and expense statements of the previous year, which will be used as an element in scoring.

vi. Reporting. HUD expects to simplify reporting for the grant program, but may require new reporting of short- and long-term outcomes in FY 2015. These potential changes are not reflected in this notice but would be implemented through future notices.

4. Funding Category. HUD will award a single Comprehensive Grant to qualified Applicants.

5. Definitions. See Appendix B.

B. Authority.

HUD's Housing Counseling Program is authorized by Section 106 of the HUD Act and Section 4 of the Department of Housing and Urban Development Act (42 U.S.C. § 3533) as amended by Title XIV of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank). The Housing Counseling Program regulations are codified at 24 C.F.R. Part 214. The Home Equity Conversion Mortgage (HECM) Program is authorized by Section 255 of the National Housing Act (12 U.S.C. § 1715z-20), and its regulations are codified at 24 C.F.R. Part 206.

II. Award Information.

A. Available Funds.

HUD is making available through this NOFA **\$3,500,000** for Notice of Funding Availability (NOFA) for the Department's Fiscal Year 2015 Supplemental Comprehensive Housing Counseling Grant Program.

Additional funds may become available for award under this NOFA as a result of HUD's efforts to recapture unused funds, use carryover funds, or because of the availability of additional appropriated funds. Use of these funds will be subject to statutory constraints. All awards are subject to the applicable funding restrictions described in the General Section and to those contained in this NOFA.

HUD estimates approximately \$3.5 million will be available for eligible applicants under this NOFA for FY 2015. This estimate is based on the estimated number of agencies that will be eligible and apply for funds under this NOFA. HUD reserves the right to award more or less than this amount, in one or more phases, depending upon the number of eligible applicants and other factors.

B. Number of Awards.

HUD expects to make approximately 60 awards from the funds available under this NOFA.

The number of awards made from funds available under this NOFA will depend on the number of eligible applicants and other factors. For information on the methodology used to make award determinations under this NOFA, please see Section V.B Review and Selection Process below.

C. Maximum Award Information.

1. Total Grant Request. Applicants are not required to request a specific award amount, nor provide a proposed budget for a grant amount but should enter a response of \$1.00 in line 18a of the SF424, Application for Federal Assistance. Applicants will be required to submit the revenue and expense statements for their counseling program for the most recent fiscal year (*i.e.*, October 1, 2013 to September 30, 2014).

2. Award Adjustments. HUD reserves the right to adjust funding levels for each grantee. Once Applicants are selected for award, HUD will determine the total amount to be awarded to any grantee, based upon the scope of services to be provided and funds available and other factors that HUD may determine.

3. Minimum and Maximum Award Amounts. Minimum and maximum award amounts for awards made from funds available under this NOFA will depend on the number of eligible applicants and other factors. For information on the methodology used to make award determinations under this NOFA, please see Section V.B Review and Selection Process below.

Estimated Total Funding:	\$3,500,000
Minimum Award Amount:	\$0 Per Project Period
Maximum Award Amount:	\$0 Per Project Period

D. Period of Performance.

Estimated Project Start Date:	10/01/2014
Estimated Project End Date:	03/31/2016
Other	

Additional Information on Project Periods

The initial period of performance for grants awarded under this program will be for a period of up to eighteen (18) months. For planning purposes, Applicants should assume that the period of performance is October 1, 2014 through March 31, 2016. On a case-by-case basis, after HUD has issued the FY 2015 awards, HUD may approve one-time requests from grantees to extend the initial period of performance for good cause. For grantees that expend their funds within twelve (12) months, such performance may positively impact their scores under future NOFAs.

E. Type of Funding Instrument.

Funding Instrument Type: Grant

HUD will likely use a Grant Agreement. All awards will be made on a cost reimbursement basis, which means that grantees will receive funding for housing counseling services that were provided prior to a draw request from HUD for reimbursement.

F. Supplementation.

Not Applicable.

III. Eligibility Information.

A. Eligible Applicants.

Eligible applicants under this NOFA include:

Others (see text field entitled "Additional Information on Eligibility" for clarification)

Additional Information on Eligibility:

1. Threshold Requirements: All Applicants and sub-grantees must meet the Threshold Requirements of the FY 2014 General Section.

2. Eligible Applicants.

a. All housing counseling agencies (including LHCAs, Intermediaries and MSOs) that are directly approved by HUD prior to the NOFA issue date and were not awarded FY 2014 comprehensive housing counseling funds through the FY 2014 – 2015 NOFA as a direct grant from HUD or as a sub-grant from an SHFA or Intermediary are eligible for this NOFA. SHFAs that were not awarded FY 2014 funds through the FY 2014 – 2015 NOFA as a direct grant from HUD or as a sub-grant from an Intermediary are also eligible.

Agencies that were awarded FY 2014 funds through the FY 2014 – 2015 NOFA as a direct grant from HUD or as a sub-grant from an SHFA or Intermediary are not eligible for this NOFA, unless the agency was awarded FY 2014 funds as an LHCA or as a sub-grantee of an SHFA or Intermediary and the LHCA or sub-grantee received HUD approval as a newly approved MSO or Intermediary on or after March 4, 2014 and prior to publication of this NOFA. Agencies meeting these criteria are eligible to apply for this NOFA using the MSO or Intermediary designation. Agencies that choose to apply under this exception will not be eligible to receive additional FY 2015 funds through the FY 2014 – 2015 NOFA as either a direct grantee from HUD or as a sub-grantee from an SHFA or Intermediary.

All other agencies that were awarded FY 2014 funds through the FY 2014 – 2015 NOFA as a direct grant from HUD or as a sub-grant from an SHFA or Intermediary are not eligible for a direct grant from HUD under this NOFA. Instead, agencies that were awarded FY 2014 funds as a direct grant from HUD will be eligible to receive FY 2015 funds using the applications HUD received under the FY 2014 – 2015 NOFA and the corresponding scores and funding methodology as described in the FY 2014 – 2015 NOFA if the agency remains interested in and eligible for such funds. Alternatively, LHCAs that were awarded FY 2014 funds as a direct grant from HUD under the FY 2014 - 2015 NOFA may affiliate with an Intermediary or SHFA and access FY 2015 funding through that affiliation. LHCAs that choose to affiliate and access FY 2015 funding through that affiliation will not be eligible to also receive additional FY 2015 funds as a direct grantee under the FY 2014 - 2015 NOFA.

Agencies that were awarded FY 2014 funds as a sub-grant from an SHFA or Intermediary will be eligible to receive FY 2015 funds as a sub-grantee from an SHFA or Intermediary if the agency remains interested in and eligible for such funds. Agencies that received FY 2014 funds as a sub-grantee from an SHFA or Intermediary that leave or are removed from that SHFA or Intermediary network for FY 2015 may be able to affiliate with a different Intermediary or SHFA and access FY 2015 funding through that affiliation. However, if the FY 2015 Intermediary or SHFA received an award through the FY 2014 – 2015 NOFA, HUD will not change the award amount the Intermediary or SHFA receives in FY 2015 based on the new affiliation except under rare, extenuating circumstances (*e.g.* the FY 2014 Intermediary or SHFA withdraws from the program).

Housing counseling agencies that have not received HUD approval but meet the Housing Counseling Program approval criteria at 24 C.F.R. § 214.103 and other HUD requirements are encouraged to affiliate with a HUD-approved Intermediary or SHFA.

b. Applicant and Sub-grantee Status. To be eligible to receive a *grant or sub-grant* under this NOFA, all Applicants, sub-grantees and branches must be:

- i. tax-exempt organizations under Internal Revenue Code (IRC) section 501(a) as described in IRC section 501(c) (26 U.S.C. §§ 501(a) and (c)), or be a local, county or state government;

- ii. in good standing under the laws and regulations of the state of their organization; and
- iii. authorized to do business in the states in which they propose to provide housing counseling services.

c. Additional Eligibility Requirements for Applicants and Sub-grantees. To be eligible to receive a grant or sub-grant under this NOFA:

i. Successful Applicants must give priority to methods that provide physical access to individuals with disabilities, *i.e.*, holding the training or any other type of meeting in an accessible location, in accordance with the regulations implementing Section 504 of the Rehabilitation Act of 1973 and Titles II and III of the Americans with Disabilities Act of 1990, as applicable. All programs or activities must be held in accessible locations unless the recipient can demonstrate that doing so would result in a fundamental alteration of the program or an undue financial and administrative burden, in which case the recipients must take any action that would not result in such an alteration or such burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, *e.g.*, training at an alternate accessible site or in-home training. Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. In addition, counseling services must comply with effective communication requirements pursuant to Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 24 C.F.R. § 8.6.

ii. [SAM.gov](https://www.sam.gov) Registration Requirement. All Applicants must have a valid, active registration in the System for Award Management (SAM). All sub-grantees must have a Data Universal Number System (DUNS) identifier. See the Summary, page 7 and Section III of the **General Section** for more information.

iii. All Applicants and sub-grantees must have resolved all outstanding issues on their most recent HUD housing counseling performance review by the later of the application deadline date of this NOFA, or the expiration date of any conditional re-approval resulting from a HUD performance review.

iv. No Applicant, sub-grantee or branch that has been, or employs an individual who has been, convicted of a violation under federal law relating to an election for Federal office (as defined in Pub. L. 111-203, 124 Stat. 1376 (July 21, 2010)) is eligible for grant funding under this NOFA.

d. Additional Eligibility Requirements for Applicant:

i. Housing Counseling Work Plan. All Applicants must have a Housing Counseling Work Plan on file with HUD. Activities specified in the HUD-9906 Housing Counseling charts must be consistent with the applicant's Work Plan and include the provision of housing counseling. Providing only education or marketing and outreach does not fulfill this requirement.

ii. Compliance with third party certifications and licensing. All Applicants must be in compliance with, and not in default under, any applicable state or other licensing and certification requirements. HUD will review individual circumstances upon request.

iii. Indirect Cost Rate. Grantees that plan to use grant funds to cover only direct costs are not required to provide an indirect cost rate. However, grantees that plan to use grant funds to cover any indirect costs must submit their approved indirect cost rate established by their cognizant federal agency.

If the grantee does not have an established indirect cost rate, it will be required to develop and submit an indirect cost proposal to HUD, or the cognizant federal agency as applicable, for determination of an indirect cost rate that will govern the award. This must occur immediately after the Applicant is advised that it will be offered a grant and, in no event, later than three months after the start date of the grant. If HUD is the grantee's cognizant federal agency, it

should refer to the Department of Health and Human Services website, <https://rates.psc.gov>, for submission requirements.

Alternatively, any non-Federal entity that has never received a negotiated indirect cost rate, except for those non-Federal entities described in Appendix VII to 2 C.F.R. Part 200 – States and Local Government and Indian Tribe Indirect Cost Proposals, paragraph D.1.b, may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. As described in 2 C.F.R. Part 200.403 Factors affecting allowability of costs, costs must be consistently charged as either indirect or direct costs, but may not be double charged or inconsistently charged as both. If chosen, this methodology once elected must be used consistently for all Federal awards until such time as a non-Federal entity chooses to negotiate for a rate, which the non-Federal entity may apply to do at any time.

See 2 C.F.R. Part 200 for additional information.

Applicants can review Indirect Cost Training on www.hud.gov at: http://www.hud.gov/offices/adm/grants/training/odgmo_training.cfm

e. Limits on Applicants. Applicants and sub-grantees are prohibited from applying for or accessing FY 2015 HUD Housing Counseling Program grant funding from multiple sources. For example, applying for funding under this NOFA as both a direct grantee (e.g. LHCA) and as a sub-grantee of an Intermediary or SHFA is prohibited. Likewise, applying for funding under this NOFA as a sub-grantee of two different Intermediaries or as a sub-grantee of an Intermediary and as a sub-grantee of an SHFA is prohibited. Similarly, accessing FY 2015 funding through the FY 2014-2015 NOFA (either as a direct grant from HUD or as a sub-grantee) and applying for or accessing additional funding under this NOFA is also prohibited.

HUD does not award grants to individuals nor will HUD evaluate an application from an ineligible applicant. Additionally, if for-profit firms are eligible they are not allowed to earn a fee (i.e., make a profit from the project).

In accordance with 2 CFR 25.200, all applicants must have an active Data Universal Numbering System (DUNS) number (www.dnb.com) and have an active registration in the System for Award Management (SAM) (www.sam.gov) *before submitting an application*. Getting your DUNS number and SAM registration can take up to four weeks; therefore, you should start this process or check your status early.

B. Cost Sharing or Matching.

Federal sources are generally not allowed to be used as cost share or match unless otherwise permitted by a program's authorizing statute.

This Program does not require an applicant to leverage resources through cost sharing or matching.

C. Other.

You must refer to Section III of the General Section for information on the following eligibility requirements. These requirements may, where applicable, determine whether your application is reviewed or make your application ineligible for funding:

Resolution of civil rights matters;

Compliance with nondiscrimination and other requirements, including but not limited to:

compliance with all applicable fair housing and civil rights laws;
affirmatively furthering fair housing;

Delinquent Federal debts;

Financial management systems that meet Federal standards;

Debarment and/or suspension from doing business with the Federal Government;
False statements;
Do Not Pay review and compliance with the Improper Payments Elimination and Recovery Improvement Act of 2012;
Standards of ethical conduct/code of conduct;
Prohibition against lobbying activities; and
Conflicts of interest.

1. Eligible Activities. Grantees and sub-grantees will be reimbursed only for the applicable activities outlined in this section. HUD reserves the right to reject funding requested for any costs that are outside the scope of housing counseling and group education services listed below:

a. Individual Housing Counseling. Individual counseling activity regarding one or more of the following topics:

Pre-Purchase/Home Buying
Resolving or Preventing Mortgage Delinquency or Default
Home Maintenance and Financial Management for Homeowners (Non-Delinquency Post-Purchase)
Rental Topics
Homeless Assistance
Reverse Mortgage

For counseling to be eligible for reimbursement under this NOFA, at a minimum, a housing counselor must perform and document each of the following activities:

i. Budget/Financial Analysis. A review of the client's income, expenses, spending habits, and use of credit in order to evaluate their unique financial situation relative to their housing needs.

ii. Housing Analysis. A review of the client's housing needs, current housing quality, and housing affordability relative to their financial capability.

iii. Action Plan. Except for reverse mortgage counseling, the housing counselor and client must establish an action plan that outlines actions the housing counseling agency and client will do in order to meet the client's housing goals and, when appropriate, addresses the client's housing problem(s).

iv. Discuss Alternatives. Identify and discuss with the client at least three (3) alternatives or options available to the client, including Federal Housing Administration (FHA) programs and products if applicable, relevant to the specific housing need. For example, if a particular company, loan product, property, or debt management program is discussed, the counseling must include a detailed discussion of alternative companies, loan products, properties, debt management programs, etc.

v. Follow-up. Efforts made by the counselor to have follow-up communication with the client, to ensure that the client is progressing toward his or her housing goal(s), to modify or terminate housing counseling services, and to determine and report outcomes.

b. Group Education/Classes: Group education or classes regarding one or more of the following topics:

Financial Literacy
Predatory Lending, Loan Scams or Fraud Prevention
Fair Housing
Pre-Purchase/Home Buying

Resolving or Preventing Mortgage Delinquency or Default
Non-Delinquency Post-Purchase including home maintenance and/or financial management
for homeowners
Locating, Securing, or Maintaining Residence in Rental Housing
Homeless Prevention

Applicants that provide education regarding any of these topics must also offer individual counseling that complements the education.

- c. Fair Housing. For both individual counseling and group education, as appropriate, educate the client with respect to fair housing, fair lending, and accessibility rights (*e.g.*, how to file a Fair Housing Act complaint, legal and illegal inquiries related to disability, reasonable accommodations, placement in the most integrated setting appropriate to the person's needs, additional protections available under state and local laws, etc.)
- d. Lead-Based Paint. Applicants that provide education or counseling regarding Pre-Purchase/Home Buying, or Locating, Securing, or Maintaining Residence in Rental Housing, are encouraged, when the homes in which clients will be seeking may include pre-1978 housing, to teach counselors how to, and inform clients about their rights and responsibilities under the HUD Lead-Based Paint Disclosure Rule (24 CFR part 35, subpart A), and, if the rental or purchase may be HUD-assisted, requirements of 24 CFR part 35, subparts B, K and R. See the lead-safety information and guidance at: www.hud.gov/offices/lead/training/trainingcurricula.cfm
- e. Marketing and Outreach Initiatives. This includes providing general information and materials about housing opportunities and issues, conducting informational campaigns, advocating with lenders for non-traditional lending standards and raising awareness about critical housing topics, such as fair housing rights and remedies, lending discrimination, predatory lending, mortgage fraud, lead safety, other fair lending issues or energy efficiency options to reduce homeowner energy costs. For example, grant funds may be utilized to purchase and disseminate materials related to the Loan Modification Scam Alert Campaign: <http://www.loanscamalert.org/> or fair housing rights.

NOTE: Marketing and outreach initiatives should follow affirmative marketing principles and be directed at those populations least likely to seek counseling services or the information marketed, including those of racial, religious or national origin groups not normally served by the sponsoring agency, as well as persons with disabilities and persons with Limited English Proficiency (LEP). To do so, it may be necessary to broaden the target areas or provide translation and interpretive services in languages other than English in order to reach a greater variety of racial and ethnic minorities. It may also require providing outreach and services in alternative formats for persons with disabilities (*e.g.*, Braille, large type, sign language interpreters, audio, assistive listening devices, etc.).
- f. Training. Eligible expenses include training, testing and certification on housing counseling topics, including, but not limited to, preparation of counselors to satisfy HUD housing counseling training, testing and certification requirements.
- g. Quality Assurance. Eligible expenses include costs associated with ensuring compliance with program rules and regulations, internal and external quality assurance, program evaluation and improvement, and the cost of implementing improved management, supervision and oversight of the housing counseling program.
- h. Computer Equipment and Systems. Eligible expenses include the cost of computer equipment and systems acquired with the objective of improving the quality of counseling and education services available.
- i. Administrative Costs. This includes direct costs associated with administering a housing counseling program, and for Intermediaries, SHFAs and MSOs managing a network of housing counseling agencies or branch offices, or both. HUD reserves the right to review and approve or

reject costs.

j. Capacity Building. This includes costs associated with hiring additional staff to meet the demand for counseling and to effectively expend grant awards.

k. Scam Awareness, Identification and Reporting. Eligible expenses include education on, identification of, and reporting of potential loan modification scams, rental scams, rent to own scams, home repair scams and similar.

2. Other Program and Grant Agreement Requirements and Obligations

a. External Audits and Investigations. All Applicants must provide the most recent audit of financial activities with completed audit no earlier than its fiscal year 2012. Applicants must be in compliance with the audit filing requirements at 2 C.F.R. Part 200.501. All Applicants not required to complete a single or program-specific audit under 2 C.F.R. Part 200.501 must submit their most recent independent financial audit. HUD will review individual circumstances upon request. Applicants must also disclose to HUD the status of active federal investigations at the time of the NOFA application submission date or thereafter. HUD may determine that Applicants are not eligible for grant funding based on its review of such external audits and federal investigation.

b. Client Management System. All Applicants, and all affiliates and branches, if applicable, must utilize a client management system acceptable to HUD that interfaces, or is working to interface, with HUD's databases. Information on client management systems and interfacing with HUD's database is found on HUD's website: http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/sfh/hcc/ohc/hcs

c. Sub-Grantees and Branches. As part of their executed Grant Agreement, Grantees must identify to HUD a list of funded sub-grantees and branches. Intermediaries, and SHFAs that award sub-grants to counseling agencies that are not HUD-approved must assure that the sub-grantee organizations meet or exceed HUD's approval standards as outlined in 24 C.F.R. Part 214 and continue to comply with all HUD requirements. Grantees may request to amend their sub-grantee list after awards are made by submitting written request and detailed justification to HUD. Such amendments will be approved at HUD's sole discretion.

d. Sub-Grant Agreement. Intermediaries and SHFAs that make sub-grants must execute sub-grant agreements with sub-grantees that clearly delineate the mutual responsibilities for program management, including appropriate time frames for reporting results to HUD and compliance with all HUD rules and regulations. Applicants that manage networks of counseling agencies must submit to HUD with their application a proposed sub-allocation plan indicating how they will divide their HUD Housing Counseling grant funds among its branches and sub-grantees, with the understanding that a written agreement with the sub-grantees will be required once the grant award with HUD is finalized. These records must meet the data requirements of the Transparency Act (*see* the HUD General Section NOFA), and must be made available to sub-grantees, branches and to HUD, within 30 days of making the sub-award or allocation to branches.

e. Succession Plans. HUD will require grantees to execute transition or succession plans to ensure continuity of services to consumers.

f. Compliance with Fair Housing and Civil Rights Law. Applicants and their sub-grantees must comply with all applicable fair housing and civil rights requirements found in 24 C.F.R. § 5.105(a), including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and Titles II and III of the Americans with Disabilities Act, as applicable. Refer to Section III.C.3. of the FY 2014 General Section for more information.

g. Inherently Religious Activity. Organizations funded under this NOFA may not engage in inherently religious activities, such as worship, religious instruction or proselytization, as part of the programs or services funded under this program. If an organization conducts such activities, these

activities must be offered separately, in time or location, from the programs or services funded under this part, and participation must be voluntary and not a condition of the HUD programs or services.

h. Documentation of Expenses. The grantee or its sub-grantees, or both, must maintain source documentation of direct costs, such as invoices, receipts, cancelled checks, and personnel activity reports, to support all Line of Credit Control System (LOCCS) draw requests for payment. This information must be made available to HUD upon request and maintained for a period of at least three (3) years after the expiration of the Grant period or date of last payment, whichever occurs first. All grantees and sub-grantees must be able to demonstrate and document the actual cost of service provision. The amount billed by the grantee or its sub-grantees, or both, to the grant cannot exceed the actual cost of providing the service.

i. Documentation of Personnel Expenses. Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed and meet the standards required in 24 C.F.R. Part 200.430(i). The records must support the distribution of employee's salaries and wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity. Budget estimates (*i.e.*, estimates determined before the services are performed) alone do not qualify as support for charges to awards. Records must reasonably reflect the total activity for which employees are compensated.

j. Ensuring the Participation of Small Businesses, Small Disadvantaged Businesses, and Woman-Owned Businesses. See the **General Section** for information on this topic.

k. Subcontracting. Grantees and sub-grantees must deliver all of the housing counseling set forth in the Applicant's Work Plan provided in response to Rating Factor 3 of this NOFA. It is not permissible to contract out housing counseling services, except as specified in 24 C.F.R. § 214.103(i).

l. Conflicts of Interest. See the **General Section** and 24 C.F.R. Part 214 for information about the Applicant's code of conduct and the prohibition against real and apparent conflicts of interest that may arise among officers, employees, agents or other parties.

m. Accessible Technology. See Section VI.B.4. of the **General Section**.

n. Participation in HUD Sponsored Program Evaluation. See the **General Section**.

o. Home Inspection Materials. If grantee provides pre-purchase counseling or homebuyer education, or both, the client(s) **must** be provided a copy of the following materials: "For Your Protection Get a Home Inspection" (HUD Form 92564) and "Ten Important Questions to Ask Your Home Inspector" (both documents can be found at http://portal.hud.gov/hudportal/HUD?src=/topics/buying_a_home and http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/sfh/insp/inspfaq)

p. Affirmatively Furthering Fair Housing. Under Section 808(e)(5) of the Fair Housing Act HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients. See Section III.C.3.b. of the FY 2014 General Section for additional information on this requirement. Examples of housing counseling activities that would fulfill the affirmatively furthering fair housing policy priority in rating factor 3(2)(c) of this NOFA and the affirmatively furthering fair housing policy priority in rating factor 2(2)(a) of this NOFA include, but are not limited to, the following:

- i. Providing persons with counseling, education, or information on discriminatory housing and mortgage lending practices and the rights and remedies available under federal, state, and local laws.
- ii. Creating and maintaining a database of accessible housing opportunities in the community

and marketing such housing opportunities to persons with Limited English Proficiency (LEP) and persons with disabilities, including those who live in segregated, institutional settings.

iii. Affirmative marketing and outreach to those populations least likely to seek the counseling or education services or information marketed, including those of racial, national origin, or religious groups not normally served by the sponsoring agency, as well as persons with disabilities and persons with Limited English Proficiency (LEP). To do so, it may be necessary to conduct marketing and outreach in a broader target area or languages other than English. It may also require conducting marketing and outreach in alternative formats for persons with disabilities (e.g. Braille, large print, audio, etc.).

iv. Providing mobility counseling to help persons move to housing that is not located in areas of poverty concentration or minority concentration, including helping persons identify housing opportunities, helping them connect with landlords, and assisting them with applying for such housing.

When housing counselors learn of alleged housing or mortgage lending discrimination that may violate federal, state, or local fair housing or civil rights laws, report the instance to HUD, a state or local Fair Housing Assistance Program (FHAP) agency, or a private fair housing group, and/or provide clients with information on how to file a housing discrimination complaint of their own.

q. Limited English Proficiency. Housing counseling agencies shall take reasonable steps to ensure meaningful access to their services to individuals with Limited English Proficiency. Applicants are to comply with Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, and may refer to the Department’s January 22, 2007 Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732).

IV. Application and Submission Information

A. Obtaining an Application Package.

An electronic copy of the Application Package and Application Instructions for this NOFA can be downloaded from [Grants.gov](http://www.grants.gov) at <http://www.grants.gov/applicants/apply-for-grants.html>.

An applicant demonstrating good cause may request a waiver from the requirement for electronic submission. If you receive a waiver, your paper application must be received by HUD before the deadline of this NOFA. To request a waiver and receive a paper copy of the application materials, you should contact:

housing.counseling@hud.gov .

1. Address to Request Application Package. See the **General Section** for specific procedures concerning the electronic application submission and timely receipt requirements. Applications and forms that you need to apply for funding under this NOFA are available from http://www.grants.gov/Applicants/apply_for_grants.jsp . If Applicants have difficulty accessing the information, Applicants may call the help desk at (800) 518-4726 or e-mailing support@grants.gov . [TheGrants.gov](http://www.grants.gov) help desk is available 24 hours a day, 7 days per week, except federal holidays.

2. Waiver of Electronic Application. See General Section for instructions. Waiver requests must be submitted to housing.counseling@hud.gov with the subject line “FY 2014-FY 2015 NOFA – Request for Waiver of Electronic Application.”

B. Content and Form of Application Submission.

To assure you have the correct Application Package and Application Instructions, you must check that the CFDA number, the Opportunity Title, and the Funding Opportunity Number on the first page of your Application Package match those listed in the Overview of this NOFA. Your application will only be considered for the competition indicated on your submission.

1. Size Limitations and Format for Narrative Statements. Applicants must be as specific and direct as possible. For all Applicants, the narrative portion (responses to all Rating Factors) must not exceed 25 double-spaced, 12-point font, single-sided pages. Pages in excess of the size limit will not be read. Applicants must number the pages of their narrative statements and include on each page a header that indicates the Applicant's name and the Rating Factor (number and title) addressed in the body of the page. For each narrative, clearly identify each sub-factor immediately above the response for that sub-factor.

Please see the FY 2014 **General Section** for instructions on electronic application submission. Applicants should carefully read the section titled "APPLICATION AND SUBMISSION INFORMATION" in the FY2014 **General Section**. This section contains information on using Adobe Reader, registration requirements, HUD's timely receipt policies, including grace period policy, and other application submission information.

Forms for your package include the HUD standard forms outlined below:

2. Application Checklist. The Application Checklist indicates forms, information, certifications and assurances that apply to this NOFA. The Excel spreadsheet that accompanies this NOFA contains a checklist that summarizes eligibility and application requirements for Applicants.

a. SF-424, Application for Federal Assistance. NOTE: In block 8.d of the form, you must include a 9 digit number for your organization's zip code (zip plus 4 digits). Please be sure to check your DUNS identifier and ensure that it is listed on SAM.gov with an active registration, and confirm that the person submitting the application has an ID and password for the Grants.gov system and has been authorized to submit the Application on behalf of the Applicant organization named in box 8a. of the SF-424 by the eBiz Point of Contact listed in the SAM.gov registration for the Applicant organization. Applicants are not required to request a specific grant amount, but should enter a response of \$1.00 in line 18a.

b. SF-LLL, Disclosure of Lobbying Activities. (Complete if applicable).

c. HUD-2995, Certification of Consistency with Sustainable Communities Planning and Implementation. This form must be signed by the Designated Point of Contact for designated Preferred Sustainability Status Community or the HUD Regional Administrator in cases where the Applicant would otherwise be self-certifying. See the General Section for details.

d. HUD-9902, Housing Counseling Agency Fiscal Year Activity Report, for the Period October 1, 2013 through September 30, 2014. This form is only required for Applicants who did not electronically submit to HUD a form HUD-9902 for the period October 1, 2013 through September 30, 2014, (*i.e.*, Applicants that received approval as a HUD housing counseling agency after September 30, 2014.) HUD will utilize the HUD-9902 data in HUD's Housing Counseling System (HCS). It is the responsibility of the Applicant to ensure that the form HUD-9902 attributed to the Applicant in HCS is correct prior to the application due date.

e. SHFA Statutory Authority. SHFAs must submit evidence of their statutory authority to operate as a SHFA, as defined in this NOFA, and must submit evidence of their authority to apply for funds and subsequently use any funds awarded. Applicants should verify that their agency profile information is accurately represented in HUD's Housing Counseling System (HCS) and validate the

information prior to submitting the grant application. HUD will contact SHFA Applicants that are new to the program to establish their profiles in the HCS.

f. Organization Description. Applicants must provide a brief description of their organization of no more than 225 words. This description will appear in the press release issued by HUD announcing the grant awards in the event that the Applicant is funded through this NOFA. Each description should contain: organizational history, purpose and mission, years of service, affordable housing services provided, and agency web address for additional information.

g. External Audits and Investigations. Applicants must provide the most recent audit of financial activities (e.g. a single or program-specific audit required under 2 C.F.R. Part 200.501) with completed audit no earlier than its fiscal year 2012. All Applicants not required to complete a single or program-specific audit under 2 C.F.R. Part 200.501 must submit their most recent independent financial audit.

h. Narrative Statement. Applicants must provide narrative statements responding to specific questions in this NOFA, including the data requested in the HUD-9906 **Housing Counseling Charts**.

i. HUD-9906 Housing Counseling Charts. Applicants must provide completed HUD-9906 Housing Counseling Charts as a required part of their application submission. The charts must be completed in their entirety in order for Applicants to receive full points.

C. Application Submission Dates and Times.

Application Deadline.

Submit your application to Grants.gov unless a waiver has been issued allowing you to submit your application in paper form. Instructions on submitting your application to Grants.gov are contained within the Application Package you downloaded from Grants.gov.

The application deadline is 11:59:59 p.m. Eastern time on **Thursday, May 7, 2015**.

Applications must be received no later than the deadline. Please refer to the General Section for more information about timely receipt of applications.

Applications must be received no later than the deadline. Please refer to the General Section for more information about timely receipt of applications.

Your application must be **both received and validated** by Grants.gov. Your application is “received” when Grant.gov provides you a confirmation of receipt and an application tracking number. **If you do not see this confirmation and tracking number, your application has not been received.**

After your application has been received, your application still must be validated by Grants.gov. During this process, your application may be “validated” or “rejected with errors.” To know whether your application was rejected with errors and the reason(s) why, you must log into Grants.gov, select “Applicants” from the top navigation, and select “Track my application” from the drop-down list. If the status is “rejected with errors,” you have the option to correct the error(s) and resubmit your application before the Grace Period ends. **If your application was “rejected with errors” and you do not correct these errors, HUD will not review your application.** If your status is “validated” your application will be forwarded to HUD by Grants.gov.

Grace Period for Grant.gov Submissions: If your application is received by Grants.gov before the deadline, but is rejected with errors, you have a grace period of one day beyond the application deadline to submit a corrected application that is received and validated by Grants.gov. Any application submitted during the grace period that does not meet the criteria above will not be considered for funding. There is no grace period for paper applications. See the General Section for more information about the grace period.

If you are required to submit supporting documentation you may either scan and attach these documents to your electronic application package or submit them via fax. If supporting documents are submitted by fax, you must use the HUD-96011 Facsimile Transmittal Form as a cover page; this form is located in your Application Package. You must send any faxes to the toll-free number **800-HUD-1010**. If you cannot access the toll-free number or experience problems using that number you may use **215-825-8798** (this is not a toll-free number). If you or any other parties submitting documents for this application do not use the form HUD-96011 that came with your application as the fax cover page, the documents cannot be matched to the application. Consequently, these documents will not be considered when the application is evaluated. Additionally, if your fax machine creates a cover page, you must turn this feature off.

Amending a Validated Application: If you resubmit an application that was previously validated by Grants.gov, all documents faxed in support of the application must be faxed again using the form HUD-96011. You must fax the materials after the resubmitted application has been validated by Grants.gov. All faxed materials must be received by the applicable deadline.

Please see the FY 2014 **General Section** for instructions for timely receipt, including actions to take if the application is rejected. Applicants should carefully read the section titled “INSTRUCTIONS ON HOW TO DOWNLOAD AN APPLICATION PACKAGE AND APPLICATION INSTRUCTIONS” in the FY2014 **General Section**. This section contains information on using Adobe Reader, registration requirements, HUD’s timely receipt policies, including grace period policy, and other application information.

D. Intergovernmental Review.

This program is not subject to Executive Order 12372, Intergovernmental Review of Federal Programs.

E. Funding Restrictions.

Not Applicable

F. Other Submission Requirements.

Lead Based Paint Requirements

When providing education or counseling on buying or renting housing that may include pre-1978 housing, when required by regulation or policy, inform clients of their rights under the Lead Disclosure Rule (24 CFR part 35, subpart A), and, if the focus of the education or counseling is on rental or purchase of HUD-assisted pre-1978 housing, the Lead Safe Housing Rule (subparts B, R, and, as applicable, F - M).

V. Application Review Information

A. Review Criteria.

A.1. Rating Factors.

Scope of Review. HUD will review all applications in accordance with the requirements of this NOFA, the General Section and Housing Counseling Program requirements. HUD may rely on performance, monitoring and audit reports, financial status information, and other information available to HUD to make score determinations for *any* relevant Rating Factor. The Factors for Award, and maximum points for each factor, are outlined below. These factors will be used to evaluate all applications. The maximum number of points available for the Rating Factors is 100 for all Applicants. In response to the various factors and sub-factors, Applicants that manage networks of counseling agencies should *not* submit a separate response for each proposed sub-grantee and branch, but should provide a brief profile of each proposed

sub-grantee and branch and a summary response for the Applicant’s entire network, highlighting individual activities, partnerships, needs and results when appropriate. Responses to the Rating Factors outlined below will be used to evaluate all applications.

See table below for a summary of the Rating Factors and Sub-factors, their point values and information on whether to use the HUD-9906 Housing Counseling Charts or provide separate narratives.

BONUS POINTS		POINTS	CHART	SEPARATE NARRATIVE
Preferred Sustainable Communities Status		2	Chart A1 or A2 and, if applicable Chart A2a, Columns B-E	N/A
RATING FACTOR		POINTS	CHART	SEPARATE NARRATIVE
Rating Factor 1. Capacity of the Applicant		33		
Sub-factor 1	Capacity	20	Chart A1 or A2 and, if applicable Chart A2a, Columns B-D, F-Q	N/A
Sub-factor 2	Performance Reviews/Compliance	7	N/A	N/A
Sub-factor 3	Measuring Client Satisfaction	6	Chart A1 or A2 and, if applicable Chart A2a, Columns B-D, F-I, R-S	N/A
Rating Factor 2. Need/ Departmental Policy/Priorities		14		
Sub-factor 1	Needs	10	Chart A1 or A2 and, if applicable Chart A2a, Columns B-D, F-I, T-V Chart F, Columns A-C	Sub-factor 1d
Sub-factor 2	NOFA Priorities	4	N/A	Sub-factors 2 a, b and c
Rating Factor 3. Soundness of Approach/Scope of Services		39		
Sub-factor 1	Past Performance – Impact	22	Charts E1 or E2 and Charts G1 or G2	Sub-factors 1b and 1c
Sub-factor 2	Projected Performance – Work Plan	12	Chart A2, Column W Chart B	Sub-factor 2b

			Chart F, Columns D-E Chart G1 or G2	
Sub-factor 3	Projected Performance/ Work Plan – Coordination	5	Chart A1 or A2 and, if applicable Chart A2a, Column X Chart C	N/A
Rating Factor 4. Leveraging Resources		4		
Sub-factor 1	Itemize Leveraging	4	Chart D	N/A
Rating Factor 5. Achieving Results and Program Evaluation		10		
Sub-factor 1	Components of Evaluation	6	Chart A1 or A2, Columns Y-AH, and, if applicable Chart A2a	Only if “x” entered in Column AH on Chart A
Sub-factor 2	Transition or Succession Plan	2	N/A	Sub-factor 2
Sub-factor 3	Participation in HUD- Sponsored Research or Pilot Programs	2	Chart C	Sub-factor 3

(1) Bonus Points - Preferred Sustainable Communities Status. All Applicants are eligible for two (2) bonus points. See the Section V of the General Section for information regarding “Preferred Sustainable Communities Status” bonus points. To be eligible to receive bonus points, an Applicant is required to obtain a certification from the designated Point of Contact for designated Preferred Sustainability Status Community or the Regional Administrator using form HUD2995 which verifies that the Applicant has met the required criteria. Applicants should indicate on Chart A1 or Chart A2 – (Column E) with an “x” whether the Applicant and if applicable, its sub-grantees or branches have obtained HUD2995 Certifications. Intermediaries, SHFAs and MSOs must obtain copies of the obtained HUD2995 certifications from all the sub-grantees or branches for which they checked Column E on Chart A2.

(2) Rating Factors. The following Rating Factors are applicable to all Applicants. Each Rating Factor and the maximum points available for each factor are outlined below. For all Applicants the maximum total available for the Rating Factors is 100 points.

a. Rating Factor 1: Capacity of the Applicant (33 Points). HUD uses responses to this Rating Factor to evaluate the readiness and ability of an Applicant and if applicable, its proposed sub-grantee and branch staff, to immediately begin, and successfully implement, the proposed work plan detailed in Rating Factor 3. HUD will also evaluate how effectively the Applicant managed work plan adjustments that may have been required if the client outcome projections for each type of counseling activity provided were not met within established timeframes and how often work plan adjustments were required.

(1) Capacity (20 points). In scoring this section, HUD will evaluate the capacity of the Applicant, including proposed sub-grantees and branches, if applicable, to implement the proposed activities in a timely and effective manner. A higher score will be awarded to

Applicants that demonstrate a greater capacity based on the factors delineated in this section. HUD will consider the following factors related to capacity, as outlined in Chart A1 or Chart A2, Applicant Characteristics, Tab 2 or Tab 3, as applicable, indicate under:

Column J, the number of FTE employees as of September 30, 2014 that provided direct housing counseling services;

Column K, the number of HUD HECM Roster Counselors;

Column L, if fifty per cent (50%) or more of counselors received formal housing counseling training in the past two years (not including on-the-job training);

Column M, if agencies require testing and/or certification for counselors;

Column N, if agencies offer alternate mode(s) of counseling (e.g. phone, internet, Skype);

Column O, if agencies adopted national industry standards prior to the NOFA application submission date;

Column P, if services are available in multiple languages; and

Column Q, if services are available in alternate formats that are accessible to persons with disabilities.

Using Chart A1 or Chart A2 – Applicant Characteristics (Tab 2 or Tab 3, as applicable), all Applicants must provide the requested information regarding the Applicant and if applicable, its proposed sub-grantees and/or branches. For example, indicate by entering an “x” in the appropriate column if the Applicant and if applicable, its sub-grantees and/or branches have adopted the National Industry Standards for Homeownership Education and Counseling (<http://homeownershipstandards.com>) prior to the NOFA application submission date.

In addition, Applicants that manage networks of counseling agencies *and* also provide direct housing counseling services at the Applicant’s main office must complete an additional step when filling out Chart A2. These Applicants must indicate their direct housing counseling activities by including the main office in the list of sub-grantees and branches on Chart A2. The main office will be treated as a branch for scoring and funding formula purposes. Applicants completing Chart A2 should mark only one “x” pertaining to Columns F, G or H and complete the corresponding columns to respond for the particular type of entity selected. Applicants completing Chart A2 that respond to Column I “Number of Sub-grantee's Branches” must also complete Chart A2a, as instructed.

When completing Charts A2 and A2a, Intermediary, SHFA and MSO applicants must only list branch offices that are open to provide housing counseling services to a minimum of thirty (30) clients per year.

(2) Performance Reviews/Compliance (7 points). In scoring this section, HUD will evaluate Applicant compliance with programmatic requirements and oversight results, for the period October 1, 2013 through September 30, 2014.

Applicants will not provide a narrative response to this sub-factor. HUD will utilize its own records to score this factor.

For the Applicant, significant findings on oversight and performance reviews conducted by HUD staff, HUD’s Inspector General, or other non-HUD auditing organizations, will be taken into consideration when scoring this section. Significant findings may be findings that suggest an Applicant has operated its agency in a manner inconsistent with Housing Counseling Program requirements, including acts of waste, fraud and abuse of grant funds. HUD will consider significant findings documented during a review(s) and/or audit(s), and incidence of repeat findings, complaints, etc. HUD may also factor in frequency and responsiveness to complaints,

the Applicant's responsiveness to findings and implementation of corrective action, grantee performance/reporting, and counseling activity reporting.

(3) Measuring Client Satisfaction (6 points). Scoring of this sub-factor will reward Applicants that measure customer satisfaction. Those Applicants that demonstrate a variety of methods and techniques to measure customer satisfaction, including those methods and techniques identified in this section, will be awarded a higher score.

Use Chart A1 or Chart A2 – Applicant Characteristics (Tab 2 or Tab 3, as applicable), to indicate if the Applicant and if applicable, its proposed sub-grantees and/or branches, measured customer satisfaction during the period October 1, 2013 through September 30, 2014. Indicate if the Applicant, and if applicable, its proposed sub-grantees and branches:

- (a) issued client exit surveys at the end of counseling or education sessions (Column R); and
- (b) issued any follow-up client surveys after the counseling was completed (Column S).

b. Rating Factor 2: Need/NOFA Priorities (14 Points). This factor addresses the extent to which there is a need for funding the proposed activities described in the Applicant's work plan and the degree to which the Applicant's work plan substantively addresses certain NOFA priorities.

(1) Needs (10 points). Applicant must report the following data regarding the communities they propose to serve. In scoring this Section, HUD will evaluate the degree to which the Applicant addressed the specific needs identified in this factor and, where requested, cited source information, and provided examples and/or brief descriptions of activities proposed to address the needs. Applicants that fail to adequately address the specific needs or provide requested source citations, examples and/or descriptions will not receive full points for this sub-factor.

(a) Rural Communities. In Chart A1 or Chart A2 – Applicant Characteristics (Tab 2 or Tab 3, as applicable), (Column T), indicate if the Applicant, or its sub-grantees and/or branches, if applicable, proposes to serve a community that includes a Rural Area as defined by the U.S. Department of Agriculture at 7 C.F.R. § 3550.10. In Chart A1 or Chart A2, (Column U), also identify if the proposed agency, sub-grantees, and/or branches serve a Rural Area that lacks Internet access at the time of the application submission.

(b) Geographically Isolated Counseling Agencies. In Chart A1 or Chart A2 – Applicant Characteristics (Tab 2 or 3, as applicable), indicate if the Applicant, or one of its sub-grantees or branch offices, is or will be the only agency, sub-grantee or branch office participating in HUD's Housing Counseling Program that is physically located in the service area of the Applicant, sub-grantee or branch (Column V).

(c) Identifying Impediments to Fair Housing Choice. Successful Applicants will be obligated to affirmatively further fair housing in their use of Housing Counseling grant funds. Therefore, on Chart F (Column B) Applicants must submit a brief description of impediments to fair housing choice in their jurisdiction or service area and, if applicable, their sub-grantees' jurisdictions or service areas, as well as strategies for overcoming the effect of such impediments. On Chart F (Column C) identify the applicable state or local Consolidated Plan and Analysis of Impediments to Fair Housing Choice or other source of information on impediments to fair housing, including but not limited to discriminatory housing practices under the Fair Housing Act and its implementing regulations at 24 C.F.R. Part 100.

(d) Persons with Disabilities and Limited English Proficiency. In a brief narrative, Applicants must briefly describe how meaningful program access will be provided to persons with disabilities and persons with Limited English Proficiency (LEP).

(2) NOFA Priorities (4 points). The NOFA Priorities are described in detail in the **General**

Section under Appendix A, NOFA Priorities. Each NOFA Priority addressed below has a point value of one (1) point. Applicants that are responding to a NOFA Priority that requires a narrative response must limit responses to 500 words per NOFA Priority

To receive credit for a particular policy priority, Applicants must indicate if and describe how their work plan substantively addresses the NOFA Priority. In addition, Applicants that are Intermediaries, SHFAs or MSOs that manage a network of sub-grantees and/or branches must specifically state that one-third or more of their sub-grantees and/or branches meet the relevant criteria, and provide at least three (3) relevant specific examples. Applicants are advised to review the full descriptions of the NOFA Priorities in the **General Section** (Appendix A), to assure a complete understanding of each policy priority, prior to responding to this sub-factor. The following NOFA Priorities apply to the Housing Counseling Program for the purpose of this NOFA.

(a) Affirmatively Furthering Fair Housing. (2 points) Applicants may receive one point for demonstrating any one of the following, with a maximum of 2 points awarded for this priority overall.

Staff Training (1 point): Applicants may earn 1 point by describing how they will train their staff on fair housing and civil rights laws, their method of providing their clients with information about their fair housing rights, and their mechanism for referring potential fair housing violations to HUD, state or local fair housing agencies, or private fair housing groups. For example, an Applicant may meet this requirement by demonstrating that it has entered into a memorandum of understanding with a fair housing enforcement agency that will provide them with fair housing training and informational materials and accept referrals of potential fair housing complaints;

Mobility Counseling (1 point): Applicants may earn 1 point by describing how they will provide clients with mobility counseling and what information Applicants will furnish to clients that will enhance their housing choice outside of areas of minority and poverty concentration;

(b) Capacity to Provide Technical Assistance in Civil Rights and Fair Housing Law: (1 point): Applicants may earn 1 point for demonstrating the Applicant's capacity (including, but not limited to, staff expertise or prior organizational experience offering civil rights and fair housing technical assistance) to provide, and plan to incorporate, technical assistance on civil rights and fair housing so that clients are better prepared to comply with the civil rights and fair housing laws applicable to the program. For example, if technical assistance is being provided to homeless shelters, applicants should be able to articulate to a client that an admissions policy that excludes individuals from shelters based on actual or perceived sexual orientation or gender identity is impermissible; and,

Partnerships with Fair Housing and Community-based Organizations: Applicants may earn 1 point for partnering with any of the organizations listed below whose service area includes the area in which grant funds will be used, or for partnering with a community-based organization that is representative of the population affected by the project.

Qualified Fair Housing Enforcement Organizations (QFHOs) and Fair Housing Enforcement Organizations (FHOs) as defined in 24 CFR 125.103 of HUD regulations implementing the Fair Housing Initiatives Program;

Agencies of State or local governments, public or private not-for-profit organizations or institutions, and other public or private entities that are representing groups of persons protected under Title VIII of the Civil Rights Act of 1968 or formulating or carrying out programs to prevent or eliminate discriminatory housing practices; and,
Agencies that participate in the Fair Housing Assistance Program (FHAP).

In order to earn the point, Applicants shall submit a memorandum of understanding (MOU) between the Applicant and the organization, or, a letter of commitment from the organization, which details the nature of the partnership, including but not limited to, the timeframe for the partnership and the activities that each organization will undertake.

The nature and extent of the partnership is flexible and will vary depending on the specific funding opportunity. At a minimum, however, the MOU or letter of commitment must describe at least one way that the civil rights or fair housing organization will make a substantial contribution to the grant activities to help ensure that they are carried out in a manner that affirmatively furthers fair housing.

(c) Increase Energy Efficiency and the Health and Safety of Homes. (2 points)

Applicants may receive, within the maximum of 2 points awarded for this priority overall, 1 point for meeting criterion A or criterion B, or both. Within criterion B, Applicants may receive the point by fulfilling either B.1 or B.2, or both.

A. Improve Residents' Home Health and Safety (1 point): The Applicant demonstrates a high degree of technical expertise (through past performance or staff competencies) in improving residents' health and safety, particularly that of children and other vulnerable populations, by promoting green and healthy design, construction, rehabilitation, and maintenance of housing and communities.

B. Green Building or Renewable Energy (1 point):

1. Green Building Standards: The Applicant must describe how its curriculum and work plan inform clients about one or more industry-recognized green building standards and certifications for green building or rehabilitation, including supporting and promoting an energy-efficient, green, and healthy housing market by retrofitting existing housing, supporting energy-efficient new construction, improving home energy labeling, or promoting financial products that reduce the carbon footprint of non-HUD-supported residential housing.

2. Renewable Energy: Applicant demonstrates through past performance and technical competencies – the ability to assist with the delivery of successful financing and/or installation of on-site renewable energy technologies in HUD-supported affordable housing.

c. Rating Factor 3: Soundness of Approach/Scope of Housing Counseling Services (39 points).

This factor addresses the quality and effectiveness of the Applicant's past and proposed housing counseling activities. In scoring this Rating Factor, HUD will evaluate the past impact of the Applicant's housing counseling services, the complexity of the projected work plan the Applicant proposes to undertake, and the degree to which the Applicant coordinates its housing counseling services with additional HUD programs and other organizations and programs.

(1) Past Performance – Impact (22 points). To score this factor, HUD will analyze performance and budget for the period October 1, 2013 through September 30, 2014.

(a) Impact. In scoring this sub-factor, HUD will evaluate the total number of education

participants and housing counseling clients served by the Applicant, during the period October 1, 2013 through September 30, 2014, with all sources of funding. HUD will utilize the form HUD-9902 data.

(b) Budget. In scoring this sub-factor, HUD will evaluate the Applicant's Housing Counseling Program budget for the period October 1, 2013 through September 30, 2014. Utilizing Chart E1 or Chart E2 – Budget (Tab 8 or 9, as applicable), for the above time period, Applicants must document their total housing counseling program budget that includes all of the activities and services shown on the Applicant's form HUD-9902 submitted to HUD for the same time period. In completing the "Total Other Direct Costs" line item on Chart E1 or Chart E2, Applicants should include expenses such as supplies; telephone/Internet; postage; office space; equipment rental/maintenance; printing and copying; marketing and outreach; training costs (supplies, room, tuition, testing, etc.) and travel. If applicable, Applicants must also include a detailed breakdown of their intermediary administrative expenses, *i.e.* funds not sub-allocated to sub-grantees and branches. If applicable, the budget must provide a full picture of both housing counseling and program management activities. All Applicants are required to submit a narrative description/justification of the budget, including variations between actual and projected expenses, expenses that did not result in the direct provision of services, expenses that seem disproportionately high, and an explanation of a value entered under the "Other" line item on the Chart E1 or Chart E2 *Budget*. In scoring this sub-factor, HUD may evaluate expenses for direct counseling service provision, the ratio of HUD grant funds to total budget and the cost per client.

(c) Oversight Activities. All Applicants must provide a brief narrative describing housing counseling oversight and quality control activities performed as part of the actual FY 2014 work plan, including how Applicants determined that, if applicable, their sub-grantees that are not HUD-approved met or exceeded HUD's Housing Counseling Program requirements.

In addition, Intermediaries, MSOs, and SHFAs that sub-allocated funding to sub-grantees and branches must complete Chart G1 to describe network management activities performed as part of the actual FY 2014 work plan.

In addition, LHCAs must complete Chart G2 to describe the process through which they requested and justified disbursements under the grant.

(2) Projected Performance - Work Plan (12 points). This sub-factor involves the proposed housing counseling services and other activities to be conducted during the period October 1, 2014 through March 31, 2016. In scoring this sub-factor, HUD will consider the types and variety of housing counseling and education services being offered, and other activities occurring in support of the Applicant's housing counseling program. Those Applicants that will provide the greatest variety of services and delivery modes, that provide a comprehensive plan for oversight activities (of their activities or those of their sub-grantees/branches), and that demonstrate how they will affirmatively further fair housing with their use of Housing Counseling grant funds will get the highest scores.

(a) Counseling and Education Services. Applicants will be evaluated on the reach and complexity of the various types of housing counseling and education services the Applicant proposes to undertake. Using Chart A2 – Applicant Characteristics (Tab 2), Intermediaries, SHFAs and MSOs must indicate the percentage of the proposed award the Applicant intends to sub-allocate to each sub-grantee and branch (Column W).

Using Chart B – *Services and Modes* (Tab 4), for each housing counseling service listed in Column A: Indicate under:

Column B, if one-on-one counseling will be provided by the Applicant and under Column C, the number of sub-grantees and/or branches that will provide one-on-one counseling;

Column D, if group education will be provided by the Applicant and under Column E, the number of sub-grantees and/or branches that will provide group education;

Column F, whether the service will be provided in-person and under column G, the number of sub-grantees and/or branches that will provide the service in person;

Column H, if the service will be provided via telephone and under Column I, the number of sub-grantees and/or branches that will provide the service over the telephone;

Column J, if the service will be provided over the internet and under Column K, the number of sub-grantees and/or branches that will provide the service over the internet;

Column L, whether the service is made available in multiple languages and in Column M, the number of sub-grantees or branches that will provide the service in multiple languages.

(b) Oversight Activities. All Applicants must provide a brief narrative describing housing counseling oversight and quality control activities that will be performed as part of the proposed work plan, including how Applicants determined that, if applicable, their sub-grantees that are not HUD-approved meet or exceed HUD's Housing Counseling Program requirements.

In addition, Intermediaries, MSOs, and SHFAs that sub-allocate funding to sub-grantees and/or branches must complete Chart G1 to describe network management activities that will be performed as part of the proposed work plan.

In addition, LHCAs must complete Chart G2 to describe the process through which they will request and justify disbursements under the grant.

(c) Affirmatively Furthering Fair Housing. Successful Applicants, including their sub-grantees, if applicable, are obligated to affirmatively further fair housing in their use of Housing Counseling grant funds. On Chart F – Affirmatively Furthering Fair Housing (Columns D and E) Applicants must describe at least one activity that addresses an impediment to fair housing choice in Applicant's and, if applicable, in at least three (3) of its sub-grantees' distinct service areas and how it will measure outcomes related to the proposed activity. Applicants must maintain records of these activities. See Section III.D.16. for examples of affirmatively furthering fair housing activities.

(3) Projected Performance/Work Plan – Coordination (5 points).

(a) Housing Counseling-related Partnerships/Collaboratives. In scoring this sub-factor, HUD will reward Applicants that actively participate in housing counseling related partnerships/collaboratives. If the Applicant, or proposed sub-grantees and branches, participate in any local, regional or state housing counseling related partnership/collaborative, on Chart A1 or Chart A2, *Applicant Characteristics* (Tab 2, or Tab 3, as applicable, Column X), indicate the names(s) of the partnership/collaborative.

(b) Complementing Other HUD Programs. Using Chart C - *Other HUD Programs* (Tab 5), all Applicants must indicate (by putting "x's" in Column C) whether the Applicant, or proposed sub-grantees or branches, provided housing counseling services in conjunction

with any of the identified HUD programs during the period October 1, 2013 through September 30, 2014. Intermediaries, SHFAs or MSOs proposing to fund sub-grantees and/or branches must also indicate the number of proposed sub-grantees and/or branches (Column D) that provide housing counseling services in conjunction with the listed HUD programs. To receive credit for this sub-factor, Applicants must specify in writing the names of “Other” HUD programs, where indicated on Chart C.

d. Rating Factor 4: Leveraging Resources (4 Points). HUD Housing Counseling grants are not intended to be the sole source of funds for an Applicant’s (or its sub-grantees) housing counseling program. All organizations that receive HUD Housing Counseling grant funds are expected to seek other sources of funding, both private and public, to supplement HUD grant funding. Points for this factor will be awarded based on the amount of leveraged funding that meets the criteria in this section. Applicants who have no other resources available will receive no points for this factor.

Applicants will be evaluated based on their ability to demonstrate that they have obtained additional **non-federal** resources including direct financial assistance (grants), fees, in-kind contribution, such as services, equipment, office space and labor to support their housing counseling activities, for the period October 1, 2014 through March 31, 2016. Leveraged resources provided by **non-federal** government sources, public or private nonprofit organizations, for-profit organizations, or other entities committed to providing assistance will be counted toward the Applicant’s leveraged funding total. Grantees will be required to maintain evidence that leveraged funds were actually provided to the agency. Files may be reviewed by HUD staff as a part of the performance reviews and on-site monitoring visits.

Leveraging resources cannot be **federal funds**, directly or indirectly. **Federal funds** that are passed through state and local governments are ineligible. Any federal funds listed on the chart will not be counted towards the total amount of leveraged funds. Do **NOT** include federal sources such as, **but not limited to:**

- National Foreclosure Mitigation Counseling Program (NFMC);
- Hardest Hit Funds (HHF);
- Community Development Block Grants (CDBG);
- Community Services Block Grants (CSBG);
- Emergency Homeowner Loan Program (EHLPP);
- Fair Housing Initiatives program (FHIP); and
- Home Investment Partnerships program (HOME).

Settlement funds from the National Mortgage Settlement (<http://www.nationalmortgagesettlement.com>) are not considered Federal and therefore can count toward leveraging.

(1) Itemize Leveraging. Utilize Chart D – *Leveraging* (Spreadsheet Tab 6) to provide the following information:

(a) All Applicants must provide an itemized list of all leveraged resources, including in-kind contributions, for the Applicant and, if applicable, each proposed sub-grantee and/or branch office.

In Column A, use the drop down button to choose the type of agency listed in Column B

In Column B, enter the name of the Applicant, sub-grantee or branch

In Column C, enter the name of the organization providing the funds or in-kind contributions

In Column D, use drop down button to choose the type of contribution
In Column E, note the time period for which funds are available In
Column F, enter for what the leveraging funds will be used (must be
exclusively allocated for the housing counseling program)
In Column G, enter only the amount of funds that will be available during the
grant period of October 1, 2014 through March 31, 2016.

Every column must be completed. The leveraging amount for any resource that does not have all columns completed will not be counted.

Include only funds that will be available during the grant period (October 1, 2014 through March 31, 2016). If Applicant's funding is available outside of the FY 2014 grant period, Applicant must pro-rate the funding to reflect the amount that is available during the grant period. For example, if funds are available from January 2014 through December 2014, include only 3 months (October 1 through December 31, 2014) of funding (e.g., only \$25,000 of a \$100,000 grant should be entered on Chart D). If funds are available for two years, the total amount of funds must be pro-rated (e.g., \$100,000 leverage available July 1, 2013 through June 30, 2015, only \$37,500 should be entered on Chart D for the months of October 1, 2014 through June 30, 2015).

Applicants that fail to provide this information will not receive any points for this factor. All leveraged resources claimed by an Applicant, including cash and in-kind contributions, must meet all of the criteria set forth in 24 C.F.R. 84.23.

In addition, do not include funds **unless** they are exclusively allocated for the housing counseling program. Resources provided by the Applicant must directly result in the provision of housing counseling services to count as leveraged resources. These funds must also be reflected in the SF424. However, resources provided by the Applicant for activities such as down payment and closing costs assistance, IDA programs and emergency services may **not** be counted and should **not** be included on Chart D or the SF424.

(b) Fees. 24 C.F.R. Part 214 explains the conditions under which agencies participating in HUD's Housing Counseling Program are permitted to charge fees to counseling recipients. Agencies participating in HUD's Housing Counseling Program are not permitted to charge fees for default counseling or homeless counseling. While agencies are strongly encouraged to aggressively leverage funds from other private and public sources, fee income can be counted as leveraged resources. Fee income must be identified as program income on line "18. Estimated Funding, f. Program Income" of SF-424 "Application for Federal Assistance" as well as in Chart D, as described above, in order to receive credit for the fee income.

e. Rating Factor 5: Achieving Results and Program Evaluation (10 points). This factor emphasizes HUD's determination to ensure that Applicants meet the commitments made in their applications and grant agreements and assess their performance in achieving agreed upon performance goals. This factor reflects HUD's Strategic Goal to embrace high standards of ethics, management and accountability. In scoring this section, HUD will consider Applicant methodologies used to evaluate overall program performance and whether the Applicant submitted their organization's transition or succession plan. Applicants that utilize a variety of methods and techniques to evaluate performance, including those methods and techniques identified in this Rating Factor, will be awarded a higher score.

In responding to this factor, Applicants must indicate how they evaluate program success. Use Chart A1 or Chart A2 – *Applicant Characteristics* (Tab 2 or 3, as applicable) to indicate specific components of evaluation used by the Applicant. Intermediaries, SHFAs or MSOs should also

indicate on Chart A2 specific components of evaluation used by **each** of its sub-grantees.

(1) Components of Evaluation. (6 points). Components of evaluation include whether the Applicant and/or its sub-grantees:

- (a) utilizes reviews by senior management staff with results reported to organization's board (Column Y);
- (b) publishes performance data (such as in annual reports, press releases, trade publications, or on the Web) (Column Z). Provide, if applicable, link to published performance data if available online (Column AA);
- (c) uses their client management system (identify CMS in Column AB) to evaluate their performance and measure whether the goals were achieved by:
 - i. generating reports on achievement of goals for management analysis (Column AC);
 - ii. using their client management system to record notes for client activity, action plan, financial analysis, and follow-up (Column AD);
 - iii. tracking grants (Column AE);
 - iv. performing Quality Control Reviews of client management system data (Column AF);
- (d) pulled credit reports as part of post counseling follow-up and reviews 6 months or more after counseling was completed (Column AG);
- (e) uses other methods of evaluation not listed above (Column AH)

Applicants that put "x's" in Column AH "*Uses Other Methods of Evaluating Program Services*" on Chart A1 or Chart A2 – *Applicant Characteristics* (Tab 2 or Tab 3, as applicable) must provide a list or brief description of the other methods that the Applicant or its sub-grantees, if applicable, use to evaluate program success. Intermediaries, SHFAs or MSOs that provide such information need only provide a list or description with a total of up to three examples of methods that the Applicant or its sub-grantees use to evaluate program success.

(2) Transition or Succession Plan. (2 points) Applicants must provide a transition or succession plan to ensure continuity of counseling services to consumers in the event that the Applicant or grantee, including sub-grantees or branches, discontinues providing housing counseling services or becomes ineligible or does not receive continued funding from HUD or other funding sources.

(3) Participation in HUD-Sponsored Research or Pilot Programs. (2 points). Applicants that participate in housing counseling-related research or pilot programs directly sponsored by HUD or provide and maintain a system (other than a Client Management System) or create or maintain materials that HUD requires other housing counseling agencies to use as part of their counseling activities, and that require funding to enable such participation, must provide a brief narrative to identify the program(s) and describe the nature of the program(s), your involvement, the amount of funding required for the program and, if applicable why additional funds are needed. In both the narrative and on Chart C, Applicants should not include any research or pilot programs for which they are fully compensated by HUD.

A.2. NOFA Priorities.

See Rating Factor 2 above for NOFA Priorities applicable to this NOFA.

A.3. Bonus Points

This Program chooses not to award bonus points.

B. Reviews and Selection Process.

1. Review and Selection Process. Two types of reviews will be conducted.

a. Technical Review. First, a technical sufficiency review will determine whether each application meets the threshold requirements set forth in this NOFA and the **General Section** and whether all required forms have been properly submitted. The **General Section** provides the procedures for corrections to deficient applications.

b. General Review. A second review will evaluate the responses to each Rating Factor outlined above and other relevant information. Applications will be evaluated competitively and ranked against all other Applicants that applied in the same funding category.

c. Rating Panels. Detailed information on the rating review panels appears in the **General Section**.

d. Minimum Fundable Score. All applications will be scored on a 100 point scale, not including bonus points, if applicable. Applications that receive a total of 75 points or more will be eligible for grant funds awarded under this NOFA. HUD anticipates making awards to all Applicants scoring 75 points or greater, however, all awards will be subject to the availability of funds. In the event that available funds are insufficient to provide grants to all Applicants achieving the minimum fundable score, grants will be awarded in rank order from highest-ranking application to lowest-ranking fundable application until all available funds have been distributed.

e. Funding Methodology. The funding methodology for this NOFA recognizes that all eligible Applicants already participate in HUD's Housing Counseling Program and those that met threshold requirements have demonstrated an acceptable level of performance and compliance with programmatic requirements. This methodology awards agencies a base grant amount determined by the size and nature of their counseling networks. The methodology then augments that amount based on performance within HUD's Housing Counseling Program; number of FTEs that perform housing counseling services need, participation in HUD-sponsored housing counseling-related research and pilot programs and other relevant factors. In determining grant amounts, HUD reserves the right to establish maximum grant amounts awarded to any individual agency.

f. Although HUD will determine the total Base Award for each grantee, grantees themselves will determine the actual funding amounts to be distributed to sub-grantees and/or branches as delineated in their response in Chart A2.

i. Base Award for LHCAs Applying Independently to HUD. For this NOFA, the funding formula will provide a Base Award for successful LHCAs applying independently to HUD. LHCAs applying independently are not eligible under this NOFA to make sub-grants.

Successful LHCAs applying independently may sub-allocate HUD grant funds to eligible branch offices, but the funding formula for this NOFA will not provide a Base Award for such branch offices.

ii. Base Award for Intermediaries, SHFAs and MSOs. For successful Applicants that do provide sub-grants or fund branches, the Base Award will be calculated using the number and nature of the Applicant's proposed sub-grantees and branches. For successful Applicants that provide direct counseling services at the Applicant's main office, HUD will count the main office as another sub-grantee or branch for the purpose of this calculation. To receive a base award under the funding methodology for this NOFA, a branch office must be open to provide housing counseling services to a minimum of thirty (30) clients per year.

iii. Competitive Funding Amount. If sufficient funding is available, a percentage of the highest scoring submissions will receive incentive funding on top of the base funding based on the score of the Applicants.

iv. Funding Based on Number of Counselor FTEs. HUD may augment the Base Award with additional funds for successful Applicants based on the number of FTEs that provide direct housing counseling services as of September 30, 2014. For successful Applicants that provide direct counseling services at the Applicant's main office, Applicant may count the number of housing counselor FTEs at the main office and at the offices of sub-grantees and/or branches.

v. Funding Based on Participation in HUD-Sponsored Research or Pilot Programs. HUD may augment the Base Award with additional funds for successful Applicants that participate in unfunded or under-funded housing counseling-related research or pilot programs directly sponsored by HUD or provide and maintain a system (other than a Client Management System) or create or maintain materials that HUD requires other housing counseling agencies to use as part of their counseling activities and that requires funding to enable such participation.

vi. Funding to Provide Support to a Network. HUD may augment the Base Award with additional funds for successful Applicants that are Intermediaries, SHFAs, or MSOs, that sub-allocate funding to sub-grantees and/or branches, including for oversight and quality control activities.

vii. Funding for Reverse Mortgage Counseling. Successful Applicants that are awarded a Comprehensive Counseling grant are eligible to receive funding for reverse mortgage counseling. The award amount will be calculated based on the number of HUD HECM Roster Counselors to be funded.

2. Reallocation of Unallocated Funds. If funds designated for this NOFA remain unallocated after the formulas have been run and award recommendations are determined, HUD may, at its discretion, reallocate those funds to FY15 Housing Counseling Training grants, FY15 Comprehensive Housing Counseling awards issued under the FY 2014 – 2015 NOFA, or any other allowable use.

3. Funds Recapture. HUD may recapture any funds unspent in the time allotted. Grantees are required to cooperate with recapture requests within the time period specified with the request. Should grantees fail to cooperate with recapture requests in a timely fashion, this will be recorded and may affect application scoring in future grant competitions. Recaptured funds will be awarded to fund any allowable use.

4. Mergers, Acquisitions and Other Changes in Organizational Structure. Anticipated mergers, acquisitions, or other changes in Grantee legal or organizational structure must be reported to Grantee's Point of Contact in HUD's Office of Housing Counseling. In the case of a simple name change, HUD may make the award in the name of the newly named entity. In the case of a merger, the new or merged entity may be eligible to receive grant funding made to the original Grantee, provided they meet certain conditions, including but not necessarily limited to:

The new or merged entity receives HUD approval as a housing counseling agency and agrees to comply with programmatic requirements, including oversight and reporting; The new or merged entity demonstrates that its application and work plan, target community, and personnel involved are substantially similar to that of the original Grantee; The newly named entity has a DUNS identifier, has registered in SAM and has passed the IRS check conducted as part of the SAM registration process;

The Name Check review process has been conducted for the proposed new awardee;

An amendment to the award agreement is made assigning the award to the new entity is completed; and

A new LOCCS access form has been filed with the HUD Accounting Office.

C. Anticipated Announcement and Award Dates.

Information regarding anticipated announcement and award dates is unavailable at this time.

VI. Award Administration Information.

A. Award Notices.

Following selection, Applicants will receive notification from HUD regarding their application.

1. Publication of Recipients of HUD Funding. HUD's regulations at 24 C.F.R. Part 4 provide that HUD will publish a notice in the Federal Register to notify the public of all funding decisions made by the Department. Please see the **General Section**, Section VIII.D.3 for more information on this topic.

2. Debriefing. See **General Section**.

B. Administrative and National Policy Requirements.

Certain Administrative and National Policy Requirements apply to all HUD programs, including this NOFA. For a complete list of these requirements, see Section VI.B. of the General Section.

1. Environmental Requirements. In accordance with 24 C.F.R. §§ 50.19(b)(2), (3), (4), (9), (12), (13) of the HUD regulations, activities assisted under this program are categorically excluded from the requirements of the National Environmental Policy Act and are not subject to environmental review under the related laws and authorities.

2. Audit Requirements. Grantees that expend \$750,000 or more in federal financial assistance in a single year (this can be program year or fiscal year) must be audited in accordance with the OMB requirements as established in 24 C.F.R. Part 84. Additional information regarding this requirement can be accessed at the following [website:http://harvester.census.gov/sac](http://harvester.census.gov/sac)

3. Other Matters.

a. Relocation. See the **General Section**.

b. OMB Circulars and Government-wide Regulations Applicable to Financial Assistance Programs. See the **General Section**. All awards under this NOFA will be subject to 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

c. Prohibition Against Lobbying Activities. See the **General Section**.

d. Procurement of Recovered Materials. See the **General Section**.

e. Executive Order 13279 Equal Protection of the Laws for Faith-Based and Community Organizations. See the **General Section**.

f. Salary Limitation for Consultants. See the **General Section**.

C. Reporting.

Please refer to Section VI of the General Section for a description of the general reporting requirements applicable to this NOFA.

1. Fiscal Year Activity Report. Grantees are required to submit Form HUD9902, Housing Counseling Activity Report, quarterly via HUD's web-based Housing Counseling System (HCS). The information compiled from this report provides HUD with its primary means of measuring program performance.

2. Transparency Act Reporting.

a. Recipient Reporting to Meet the Requirements of the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act), as amended.

(1) Prime Grant Awardee Reporting. Prime recipients of the Department's financial assistance are required to report certain sub-awards in the Federal Funding Accountability and Transparency Act Sub-award System (FSRS) website located [atwww .fsrs .gov](http://www.fsrs.gov) or its successor system for all prime awards listed on the FSRS website.

(a) Starting with awards made October 1, 2010 prime financial assistance awardees receiving funds directly from the Department are required to report sub-awards and executive compensation information both for the prime award and sub-award recipients, including awards made as pass-through awards or awards to vendors, if the initial prime grant award is \$25,000 or greater, or the cumulative prime grant award will be \$25,000 or greater if funded incrementally as directed by HUD in accordance with OMB guidance; and the sub-award is \$25,000 or greater, or the cumulative sub-award will be \$25,000 or greater. For reportable sub-awards, if executive compensation reporting is required and sub-award recipients' executive compensation is reported through the SAM system, the prime recipient is not required to report this information. The reporting of award and sub-award information is in accordance with the requirements of the Transparency Act, as amended by section 6202 of Public Law 110-252 and OMB Guidance issued to the Federal agencies on September 14, 2010 (75 FR 55669) and in OMB Policy guidance. Please refer to <https://www.fsrs.gov/> for complete information on requirements under the Transparency Act and OMB guidance.

VII. Agency Contact(s).

HUD staff will be available to provide clarification on the content of this NOFA. Please note that HUD staff cannot assist applicants in preparing their applications.

Questions regarding specific program requirements should be directed to the point of contact listed below.

A. Technical Assistance and Programmatic Information. For program related information, Applicants should contact housing.counseling@hud.gov. **Hearing and speech-impaired persons** may access the telephone numbers listed below by calling the Federal Information Relay Service at 800 877-8339.

B. Satellite Broadcast. HUD may hold an informational broadcast to provide information about the Housing Counseling Program and this NOFA to potential Applicants. The Housing Counseling Program Office will notify all eligible Applicants regarding the timing to view information for any such broadcast.

Questions concerning the General Section should be directed to the Office of Strategic Planning and Management, Grants Management and Oversight Division at 202-708-0667 (this is not a toll-free number).

Persons with hearing or speech impairments may access these numbers via TTY by calling the toll-free Federal Relay Service at 800-877-8339.

VIII. Other Information.

1. This NOFA provides funding under 12 U.S.C. 1701x, et seq., which does not contain environmental review provisions because it is excluded from environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321) ("NEPA"). Accordingly, under 24 CFR §50.19(c)(5), this program is categorically excluded from environmental review under the NEPA.

2. Information Collection Approval Note. The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2502-0261. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not

required to respond to, a collection of information unless the collection displays a currently valid OMB control number. Public reporting burden for the collection of information is estimated to average 68 hours per annum per respondent for the application and grant administration. This includes the time for collecting, reviewing, and reporting the data for the application, semi-annual reports and final report. The information collected pursuant to this NOFA will be used for grantee selection and monitoring the administration of funds. Response to this request for information is required in order to receive the benefits to be derived.

Appendix.

Appendix A

State Housing Finance Agencies (SHFAs) and HUD-approved Intermediaries *The following agencies participate in HUD's Housing Counseling Program*

Agency Name	City	State	Agency Phone General	Agency Website
CATHOLIC CHARITIES USA	ALEXANDRIA	VA	818-521-8829	http://www.catholiccharitiesusa.org
CCCS OF GREATER ATLANTA - DBA CLEARPOINT CREDIT COUNSELING SOLUTIONS	ATLANTA	GA	800-251-2277	http://www.credability.org
CITIZENS' HOUSING AND PLANNING ASSOCIATION, INC.	BOSTON	MA	617-742-0820	http://www.chapa.org
CLEARPOINT FINANCIAL SOLUTIONS, INC.	RICHMOND	VA	877-877-1995	http://www.clearpointcreditcounselingsolutions.org/
GARDEN STATE CONSUMER CREDIT COUNSELING, INC. D/B/A/ NOVADEBT	FREEHOLD	NJ	866-472-4557	www.novadebt.org
GREENPATH, INC.	FARMINGTON HILLS	MI	888-860-4167	www.greenpath.org
HOMEFREE - U S A	RIVERDALE	MD	301-891-8400	http://www.homefreeusa.org

HOMEOWNERSHIP PRESERVATION FOUNDATION	MINNEAPOLIS	MN	612-230-4020	http://www.995hope
HOUSING & COMMUNITY DEVELOPMENT NETWORK OF NEW JERSEY	TRENTON	NJ	609-953-3752-2000	http://www.hcdnnj.org/
HOUSING OPPORTUNITIES COLLABORATIVE	SAN DIEGO	CA	619-238-2200	n/a
HOUSING PARTNERSHIP NETWORK	BOSTON	MA	617-259-1832	www.housingpartnership.net
MINNESOTA HOMEOWNERSHIP CENTER	SAINT PAUL	MN	651-659-9336	www.hocmn.org
MISSION OF PEACE	FLINT	MI	810-232-8302	http://www.missionofpeace.com
MISSISSIPPI HOMEBUYER EDUCATION CENTER-INITIATIVE	JACKSON	MS	601-366-9141	www.mhbec.com
MON VALLEY INITIATIVE	HOMESTEAD	PA	412-464-4000-4026	http://www.monvalleyinitiative
MONEY MANAGEMENT INTERNATIONAL INC.	Sugar Land	TX	866-232-9080	http://www.moneymanagement.org
NACA (NEIGHBORHOOD ASSISTANCE CORPORATION OF AMERICA)	JAMAICA PLAIN	MA	617-250-6222-1299	http://www.naca.com
NATIONAL ASSOCIATION OF REAL ESTATE BROKERS-INVESTMENT DIVISION, INC	OAKLAND	CA	510-268-9792	http://www.nidonline.org
NATIONAL CAPACD	WASHINGTON	DC	510-452-4800	http://nationalcapacd.org

NATIONAL COMMUNITY REINVESTMENT COALITION, INC.	WASHINGTON	DC	800-475-6272	http://www.ncrc.org
NATIONAL COUNCIL OF LA RAZA	WASHINGTON	DC	202-776-1573	http://www.nclr.org
NATIONAL COUNCIL ON AGING (NCOA)	WASHINGTON	DC	855-899-3778	http://www.ncoa.org
NATIONAL FEDERATION OF COMMUNITY DEVELOPMENT CREDIT UNIONS	NEW YORK	NY	212-809-1850-220	www.cdccu.coop
NATIONAL FOUNDATION FOR CREDIT COUNSELING, INC.	WASHINGTON	DC	202-677-4341	http://www.nfcc.org
NATIONAL URBAN LEAGUE	NEW YORK	NY	212-558-5374	http://www.nul.org
NEIGHBORHOOD REINVESTMENT CORP. DBA NEIGHBORWORKS AMERICA	WASHINGTON	DC	202-760-4000	http://www.nw.org
NEW YORK MORTGAGE COALITION	NEW YORK	NY	212-742-0762	www.nymc.org
NUEVA ESPERANZA, INC.	Philadelphia	PA	215-324-0746	http://www.esperanza
RURAL COMMUNITY ASSISTANCE CORPORATION	WEST SACRAMENTO	CA	916-447-9832-1015	http://www.rcac.org
SPRINGBOARD NON-PROFIT CONSUMER CREDIT MANAGEMENT, INC	RIVERSIDE	CA	800-947-3752	http://www.homeownership.org
UNITED WAY OF CENTRAL ALABAMA, INC.	BIRMINGHAM	AL	205-251-5131	www.uwca.org
WEST TENNESSEE LEGAL SERVICES, INCORPORATED	JACKSON	TN	731-426-1307	www.wtlls.org
ARKANSAS DEVELOPMENT FINANCE AUTHORITY	LITTLE ROCK	AR	501-682-5923	www.arkansas.gov/adfa

COLORADO HOUSING AND FINANCE AUTHORITY	DENVER	CO	303-297-7428	www.chfa.info.com
CONNECTICUT HOUSING FINANCE AUTHORITY	ROCKY HILL	CT	860-571-4396	http://www.chfa.org
DELAWARE STATE HOUSING AUTHORITY	DOVER	DE	302-739-4263-239	www.destatehousing.com
GEORGIA HOUSING AND FINANCE AUTHORITY	ATLANTA	GA	404-982-3505	http://www.dca.ga.gov
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION	HONOLULU	HI	808-587-0597	http://hawaii.gov/dbedt/hhfdc
IDAHO HOUSING AND FINANCE ASSOCIATION	BOISE	ID	877-888-3135	http://www.ihfa.org
KENTUCKY HOUSING CORPORATION	FRANKFORT	KY	502-564-7630-315	www.kyhousing.org
LOUISIANA HOUSING CORPORATION	BATON ROUGE	LA	225-763-8852	lhc.la.gov
MAINE STATE HOUSING AUTHORITY	AUGUSTA	ME	207-626-4670	www.mainehousing.org
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY	LANSING	MI	517-373-6840	www.michigan.gov/mshda
MISSISSIPPI HOME CORPORATION	JACKSON	MS	601-718-4642	http://www.mshomecorp.com
MONTANA BOARD OF HOUSING	Helena	MT	406-841-2851	www.housing.mt.gov
NEW HAMPSHIRE HOUSING FINANCE AUTHORITY	Bedford	NH	603-310-9287	http://www.nhhfa.org
NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY	TRENTON	NJ	609-278-7447	http://www.nj.gov/dca/hmfa

NEW MEXICO MORTGAGE FINANCE AUTHORITY	ALBUQUERQUE	NM	505-843-6880-2222	http ://www .housi ngnm .org
NEW YORK STATE HOUSING FINANCE AGENCY	NEW YORK	NY	716-847-7954	www .nyshecr .org
NORTH CAROLINA HOUSING FINANCE AGENCY	RALEIGH	NC	919-877-5700	www .nchfa .com
NORTH DAKOTA HOUSING FINANCE AGENCY	BISMARCK	ND	701-328-8060	http ://www .ndhfa .org
PENNSYLVANIA HOUSING FINANCE AGENCY	HARRISBURG	PA	800-342-2397	http ://www .phfa .org
RHODE ISLAND HOUSING AND MORTGAGE FINANCE CORPORATION	PROVIDENCE	RI	401-457-1130	www .rhode islan dhous ing .org
SOUTH DAKOTA HOUSING DEVELOPMENT AUTHORITY	PIERRE	SD	605-773-3181	http ://www .sdhda .org
VIRGIN ISLANDS HOUSING FINANCE AUTHORITY	St. Thomas	VI	340-777-4432	http ://www .vihfa .gov
VIRGINIA HOUSING DEVELOPMENT AUTHORITY	RICHMOND	VA	804-343-5534	www .vhda .com
WASHINGTON STATE HOUSING FINANCE COMMISSION	SEATTLE	WA	206-287-4449	http ://www .wshfc .org

Appendix B

Definitions

1. Affiliate. A nonprofit organization participating in the HUD-related housing counseling program of a regional or national intermediary, or state housing finance agency. An affiliate is incorporated separately from the Intermediary or SHFA. An affiliate is also:

- a. Duly organized and existing as a tax-exempt nonprofit organization;
- b. In good standing under the laws of the state of the organization; and
- c. Authorized to do business in the states where it proposes to provide housing counseling services.

2. Applicant. A HUD-approved housing counseling agency or SHFA applying for a Housing Counseling grant from HUD through this NOFA. The term “Applicant” includes the agency’s branches identified in its application.

3. Branch. An organizational and subordinate unit of an LHCA, MSO, Intermediary or SHFA, not separately incorporated or organized, that participates in HUD’s Housing Counseling Program. A branch must be in good standing under the laws of the state where it proposes to provide housing counseling services. A branch cannot be a sub-grantee or affiliate.

4. Counseling. Counselor-to-client assistance that addresses unique financial circumstances and housing issues and focuses on ways of overcoming specific obstacles to achieving a housing goal such as addressing a rental dispute, purchasing a home, locating resources for a down payment, being informed of fair housing and fair lending requirements of the Fair Housing Act, finding units accessible to persons with disabilities and persons with Limited English Proficiency, avoiding foreclosure, or resolving a financial crisis.

5. Education. Formal classes, with established curriculum and instructional goals, provided in a group or classroom setting, or other format approved by HUD, covering one or more of the eligible topics in Section III.C.1. of this NOFA or 24 C.F.R. 214.103.

6. Full-time equivalent. The number of total hours worked divided by the maximum number of compensable hours in a full-time schedule as defined by law. For example, if the normal schedule for a quarter is defined as 411.25 hours ([35 hours per week * 52 weeks per year – 5 weeks regulatory vacation]) / 4), then someone working 100 hours during that quarter represents $100/411.25 = 0.24$ FTE. Two employees working in total 400 hours during that same quarterly period represent 0.97 FTE.

7. Grantee. A HUD-approved housing counseling agency or SHFA that receives housing counseling funds from HUD through this NOFA. The term “Grantee” includes the Grantee’s branches identified in its application.

8. HUD HECM Roster Counselor. A housing counselor that has met the requirements pertaining to HUD’s HECM Counseling Standardization and Roster (24 C.F.R. 206, Subpart E) and appears on the HUD HECM Counselor Roster.

9. Intermediary. A HUD-approved organization that provides housing counseling services indirectly through its branches or affiliates for whom it exercises control over the quality and type of housing counseling services rendered.

10. Local Housing Counseling Agency (LHCA). A housing counseling agency that directly provides housing counseling services. An LHCA may have a main office, and one or more branch offices, in no more than two contiguous states.

11. Multi-State Organization (MSO). A multi-state organization provides housing counseling services through a main office and branches, in two or more states.

12. State Housing Finance Agency (SHFA). Any public body, agency or instrumentality created by a specific act of a state legislature empowered to finance activities designed to provide housing and related facilities and services, through land acquisition, construction or rehabilitation, throughout an entire state. SHFAs may provide direct counseling services or sub- grant housing counseling funds to affiliated housing counseling agencies within the SHFA’s state, or both. The term state includes the fifty states, Puerto Rico, the District of Columbia, Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, and the U.S. Virgin Islands.

13. Sub-grantee. An affiliate of a HUD-approved Intermediary or SHFA that receives a sub-grant of housing counseling funds provided under a HUD housing counseling grant. All sub-grantees must be identified in the grantee’s application. Under certain conditions, including approval by HUD, grantees may amend their sub-grantee list after awards are made. See General Section.

14. Reverse Mortgage. A reverse mortgage is a mortgage that pays a homeowner loan proceeds drawn from accumulated home equity and that requires no repayment until a future time.