



U.S. Department of Housing
and Urban Development

Comprehensive Housing Counseling (CHC) and the Housing Counseling Training (HCT) NOFO (FY2025)

FR-6900-N-33

Applications are due by 11:59 PM Eastern Time on 05/26/2026.

Office of Housing

TABLE OF CONTENTS

I. BASIC INFORMATION.....	5	DEADLINES.....	54
A. Summary.....	5	A. Deadlines.....	54
B. Agency Contact(s).....	8	B. Submission Methods.....	54
II. ELIGIBILITY.....	10	C. Other Submissions.....	55
A. Eligible Applicants.....	10	D. False Statements.....	55
B. Cost Sharing or Matching.....	13	VII. POST-AWARD REQUIREMENTS AND	
III. PROGRAM DESCRIPTION.....	15	ADMINISTRATION.....	58
A. Purpose.....	15	A. Administrative, National and Departmental Policy	
B. Goals and Objectives.....	15	Requirements, and General Terms and Conditions	
C. Authority.....	16	58
D. Unallowable Costs.....	16	B. Environmental Requirements.....	60
E. Indirect Costs.....	16	C. Remedies for Noncompliance.....	60
F. Program History.....	16	D. Reporting.....	60
G. Other Information.....	17	VIII. CONTACT AND SUPPORT.....	67
IV. APPLICATION CONTENTS AND FORMAT.....	19	A. Agency Contact.....	67
A. Standard Forms, Assurances, and Certifications	19	B. Grants.gov.....	67
B. Budget.....	20	C. SAM.gov.....	67
C. Narratives and Other Attachments.....	21	D. Debriefing.....	67
D. Other Application Content.....	23	E. Applicant Experience Survey.....	68
V. APPLICATION REVIEW INFORMATION.....	25	F. Other Online Resources.....	68
A. Threshold Review.....	25	APPENDIX.....	70
B. Merit Review.....	25	Appendix I. Definitions.....	70
C. Risk Review.....	46		
D. Selection Process.....	46		
E. Award Notices.....	52		
VI. SUBMISSION REQUIREMENTS AND			

BEFORE YOU BEGIN

If you believe you are a good candidate for this funding opportunity, register in the appropriate systems now and review the application package. If you are already registered, make sure your registration is active and up-to-date.

SAM.gov Registration

You must have an active and up-to-date account with [SAM.gov](https://sam.gov), at the time of application and throughout the life of any award.

To register, go to [SAM.gov Entity Registration](https://sam.gov) and click Get Started. From the same page, you can also click on the Entity Registration Checklist for the information you will need to register.

It can take several weeks to register in [SAM.gov](https://sam.gov), so please get started now if you are planning to apply. [SAM.gov](https://sam.gov) also provides each organization with a unique entity identifier (UEI). A valid UEI is required to apply for funding.

Grants.gov Registration

You must have an active [Grants.gov](https://grants.gov) registration. This requires a [Login.gov](https://login.gov) registration as well. See step-by-step instructions at the [Grants.gov Quick Start Guide for Applicants](https://grants.gov). You must apply for funding using [Grants.gov](https://grants.gov), unless HUD has approved your [waiver request](https://grants.gov).

See [Section VI.B](https://grants.gov). Submission Methods.

Find the Application Package

Use the Grants Search at [Grants.gov](https://grants.gov) and search for opportunity number FR-6900-N-33 . The application package has all the online forms you need to apply. You also need to access the Download Instructions link and review the content before you apply.

If you have other technical difficulties using [Grants.gov](https://grants.gov), access the Support Center on [Grants.gov](https://grants.gov) for assistance.

To get updates on changes to this notice of funding opportunity (NOFO), click Subscribe from the View Grant Opportunity page for this NOFO on [Grants.gov](https://grants.gov).

Application Deadline

Applications are due by 11:59 PM Eastern Time on 05/26/2026.

HUD Listserv

If you are interested in email notices about upcoming funding opportunities, subscribe to [HUD's Funding Opportunities listserv](https://grants.gov).

Note: To help you find what you need, this NOFO uses internal links. In Adobe Reader, you can go back to where you were by pressing Alt + Left Arrow (Windows) or Command + Left Arrow (Mac) on your keyboard.

I. BASIC INFORMATION

I. Basic Information

A. Summary

B. Agency Contact(s)

I. BASIC INFORMATION

See [Contact and Support](#) section of this NOFO.

A. Summary

Federal Agency Name:

United States Department of Housing and Urban Development (HUD)

HUD Program Office:

Office of Housing

Announcement Type:

Initial

Program Type:

Discretionary

Paperwork Reduction Act Information:

2501-0044, 2502-0621, and 2502-0567

Due Date for Intergovernmental Review:

See [Section VI.C.1.](#)

Key Facts

Opportunity Name:

Comprehensive Housing Counseling (CHC) and the Housing Counseling Training (HCT) NOFO (FY2025)

Opportunity Number:

FR-6900-N-33

Federal Assistance Listing:

14.169

Key Dates

Application Due Date:

11:59:59 PM Eastern Time on:

05/26/2026

Anticipated Award Date:

08/03/2026

Estimated Performance Period Start Date:

08/03/2026

Estimated Performance Period End Date:

03/31/2027

1. NOFO Summary

This NOFO provides competitive awards to support housing counseling agencies (HCAs). These agencies help consumers make informed housing decisions by providing information, advice, and tools for finding, financing, maintaining, renting, or owning a home. This NOFO solicits applications for the following programs:

1. Comprehensive Housing Counseling (CHC)
2. Housing Counseling Training (HCT)

This NOFO also includes a Minority Serving Institution (MSI) Initiative, which is available to eligible applicants of the CHC or HCT programs.

You may apply for more than one program using a single application. Each program has distinct application criteria, as outlined in this NOFO. Review the criteria for each program before you submit your application. HUD will not fund incomplete, ineligible, or noncompetitive applications.

HUD expects to distribute funding for the HCT program using a cooperative agreement. HUD's substantial involvement in cooperative agreements includes, but is not limited to, the following items:

- (a) Review and approval of marketing of courses;
- (b) Work plan changes, including increasing the availability of remote training;
- (c) Review and approval of proposed courses, including course materials;
- (d) Provision of counseling content standards;
- (e) Provide recommendations for course work, training or other activities that address Departmental initiatives;
- (f) Review and approval of training locations, technology and logistics. HUD reserves the right to review and approve or reject training locations, technology, and logistics as well as the type of training and courses offered including review to ensure appropriate access is provided for persons with disabilities;
- (g) Review and approval of evaluation instruments and methodology for determining value of courses and impact;
- (h) Identify functional needs of persons with disabilities and outreach techniques; and
- (i) Course audit by HUD staff.

2. Funding Details

Type of Funding Instrument

CA (Cooperative Agreement)
G (Grant)

A grant applies to the CHC program. A cooperative agreement applies to the HCT program. Though structured under a cooperative agreement, funds used for housing counseling training pursuant to this NOFO are still recognized as grant funds.

Available Funds

Funding of approximately **\$56,100,000** is available through this NOFO.

Additional funds may become available for award. Use of these funds is subject to statutory constraints. All awards are subject to the selection process contained in this NOFO.

	Comprehensive Housing Counseling (CHC)	Housing Counseling Training (HCT) (Previously TNOFO)
Total funding by award	\$54,600,000 This includes \$3,000,000 set aside for the MSI Initiative.	\$1,500,000
Period of Performance Start Date	10/1/2025	10/1/2025
Length of Period of Performance (POP)	18 months	18 months
Minimum Award Amount Per Program, and Budget Periods	\$1	\$1
Maximum Award Amount Per Program and Budget Periods	\$3,000,000	\$1,500,000
Payment	Cost Reimbursement Award	Cost Reimbursement Award

HUD reserves the right to award additional funds from any eligible source if such funds become available. In making determinations of additional funding to grantees, HUD may use one or more FY2025 NOFO application criteria and/or grantees' demonstrated performance. Use of these funds is subject to statutory constraints. All awards are subject to the funding restrictions contained in this NOFO.

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. HUD reserves the right to set aside funds towards specific housing counseling initiatives, as well as add unobligated funding from any available source year to this NOFO funding amount.

HUD also reserves the right to issue a Supplemental Housing Counseling NOFO in FY2026, which may be limited to new applicants or to provide support for specific housing counseling activities.

HUD may grant extensions as necessary, subject to statutory and regulatory constraints. The grant agreement and 2 C.F.R. 200.308(f)(10) allow HUD to modify the grant agreement's period of performance for all grantees. HUD may waive the written request requirement and may approve extensions for all NOFO grants as deemed necessary.

Number of Awards

HUD expects to make approximately 175 awards from the funds available under this NOFO. **Total Grant Request.** Applicants should enter a response of \$1.00 in line 18a of the SF-424. Applicants are not required to request a specific award amount nor provide a proposed budget for a grant amount. Please reference the funding methodology section for each program in Section V.

MSI funds will be awarded to HUD-approved housing counseling agencies in addition to the maximum award amount. Comprehensive Housing Counseling (CHC) and Housing Counseling Training (HCT) awards are separate and have their own maximum award amounts.

Length of Performance Period:

18-month project period and budget period

Length of Periods Explanation:

For more information on the Period of Performance, please see table above in "Available Funds."

B. Agency Contact(s)

See [Contact and Support](#) section of this NOFO.

II. ELIGIBILITY

II. Eligibility

A. Eligible Applicants

B. Cost Sharing or Matching

II. ELIGIBILITY

You are invited to apply if your organization is an eligible entity type and meets the funding conditions included in the NOFO. HUD will review applications from eligible applicants using the criteria in [Section V. of this NOFO](#).

A. Eligible Applicants

1. Eligible Entity Types:

00 (State governments)

12 (Nonprofits having a 501(c)(3) status with the IRS, other than institutions of higher education)

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

Additional Information on Eligibility

[Faith-based organizations](#) may apply on the same basis as any other organization. [HUD does not engage in any unlawful and improper conduct, policies, or practices that target faith-based organizations.](#)

Individuals are ineligible applicants.

Additional Information on Eligibility - Must be 501(c)(3) and does not conduct, facilitate, or participate in 501(c)(4) or 501(c)(6) activities.

Applicant must be approved to participate in the HUD Housing Counseling Program prior to the NOFO issue date. Applicant must be exempt from taxation under Internal Revenue Code (IRC) Section 501 (a) as an entity described in IRC Section 501(c) (26 U.S.C. § 501 (a) and (c)), or units of local, county, or state government.

Applicant Eligibility for Grant Opportunities available under this NOFO

1. **Comprehensive Housing Counseling (CHC):** HUD-approved housing counseling agencies, and State Housing Finance Agencies (SHFAs)* meeting specific criteria.
2. **Housing Counseling Training (HCT):** Non-profit organizations, other than institutions of higher education, with at least two years of experience providing housing counseling training services nationwide to housing counselors employed by housing counseling agencies participating in HUD's Housing Counseling Program.

SHFAs are eligible for this NOFO if they possess statutory authority to provide housing counseling throughout their entire state and adhere to all program requirements outlined in 24 C.F.R. Part 214, HUD Handbook 7610.1, and other governing policies and requirements.

A.2. Eligible Activities

A. Eligible Activities under the CHC and MSI Programs. HUD requires Grantees to use grant funds for housing counseling and group education in accordance with 24 C.F.R. Part 214 and Handbook 7610.1. The restrictions applicable to the specific awards are described below. To be eligible for reimbursement as direct costs, costs must be incurred pursuant to

one or more of the following activities:

1. Housing counseling (See (2)(a)(ii)(A) in this section for limitations.)
2. Group education as defined in 24 CFR 214.3 “Education”
3. Oversight, compliance, and quality control
4. Supervision of housing counseling staff
5. Housing counselor training and certification
6. Marketing and outreach of the program

2. Restrictions

a. Statutory and Regulatory Requirements Affecting Eligibility

You must comply with the current [General Statutory and Regulatory Requirements Affecting Eligibility for HUD’s Competitive Programs](#). HUD will review your eligibility before issuing an award. As part of this review, HUD uses [SAM.gov](#) and Department of Treasury data.

i. Funding Restrictions Applicable to all awards for this NOFO

Additional restrictions related to this NOFO are included in the standard terms and conditions. See Section VII “Post Award Requirements”.

ii. Additional Funding Restrictions applicable to the awards under this NOFO

A. Reimbursement under the CHC grant and the MSI Program for one-on-one housing counseling is limited to:

1. Rental housing counseling (24 C.F.R. 5.100) to HUD-assisted households as defined in Appendix 1 with a focus on building financial independence and creating clear pathways toward transitioning into unassisted rental or owner-occupied housing.
2. Post-purchase homeownership counseling for eligible homeowners as defined in Appendix 1 related to: (1) preventing or resolving mortgage delinquency; and (2) non-delinquency counseling (e.g., home maintenance and financial management, budgeting, refinancing, etc.).
3. Home Equity Conversion Mortgage (HECM) counseling;
4. Disaster preparedness and recovery counseling to HUD-assisted households and eligible homeowners to help reduce long-term recovery costs and minimize the financial impact on federal resources;
5. Homeless prevention counseling services (in accordance with E.O. 14321), including information regarding treatment, recovery, and self-sufficiency.
6. Other activities as outlined as a HUD priority in the Grant Agreement.

a. Limits on CHC Applicants. Applicants and Subgrantees are prohibited from receiving FY2025 Housing Counseling Program grant funding from multiple sources. For example, receiving funding under this NOFO as both a direct Grantee (e.g. LHCA) and as a Subgrantee of an Intermediary or SHFA is prohibited. Likewise, receiving funding under this NOFO as a Subgrantee of two different Intermediaries/SHFAs is prohibited.

B. Reimbursement for the Housing Counseling Training (HCT) Program is limited to:

1. **Cooperative Agreement (2 C.F.R. 200.1).** HUD expects to use a cooperative agreement

for HCT Awards.

2. Cost Reimbursement Award. (2 C.F.R. 200.1) All awards will be made on a cost reimbursement basis in accordance with, and subject to, the requirements in 2 C.F.R. Part 200.

3. Salary Limitation for Consultants. FY2025 HCT Grant funds may not be used to pay or provide reimbursement for payment of the salary of a consultant/trainer, whether retained by the federal government or the Grantee, at a rate more than the equivalent of General Schedule 15, Step 10 base pay rate for which the annual rate for FY2025 is \$159,950. The hourly rate is \$76.64.

4. HCT Program Reporting Requirements. Award recipients will be required to submit monthly and quarterly progress reports, as specified in the HCT Cooperative Agreement.

b. Application Eligibility

Your application is considered for funding if it satisfies the application review requirements in [Section V. of this NOFO](#).

Program-Specific Requirements

Unless specifically noted, the following program-specific requirements are for all grant applications in this NOFO.

- 1. MSI Program.** Applicants requesting funds dedicated for Historically Black Colleges and Universities (HBCUs) and other MSIs (and partnerships therewith) must submit evidence of the college or university's status as an HBCU or MSI. Additionally, Applicants that are partnering with an HBCU or MSI must submit a letter certifying that an HBCU or other MSI partnership is in place or that there is an intent to enter a partnership. The letter must be signed by the Applicant and an authorizing official of the HBCU or other MSI and the Applicant must provide documentation of the partnering college or university's status as an HBCU or other MSI.
- 2. Audits and Investigations.** Successful Applicants must provide the most recent audit of financial activities (e.g., a single or program-specific audit required under 2 C.F.R. §200.501) completed no earlier than FY 2022. All Applicants not required to complete a single or program-specific audit under 2 C.F.R. §200.501 must submit their most recent independent financial audit. HUD will review individual circumstances upon request. At the time of the NOFO application submission date and thereafter, all Applicants must disclose to HUD the status of active investigations as outlined in 24 C.F.R. §214.103(c). HUD may determine that Applicants are not eligible for grant funding based on its review of HUD, HUD Office of Inspector General (OIG), or other government audits or investigations.
- 3. Subcontracting.** Grantees and Subgrantees must deliver the housing counseling services set forth in the Applicant's Work Plan. It is not permissible to contract out housing counseling services, except as approved by HUD as specified in 24 C.F.R. 214.103(i).

4. **Subgrant Agreement.** Intermediaries and SHFAs that award subgrants must execute subgrant agreements with Subgrantees that delineate the mutual responsibilities for program management, including appropriate time frames for reporting results to HUD and compliance with HUD rules and regulations. These records must meet the data requirements of the Federal Funding Accountability and Transparency Act of 2006 (FFATA) (P.L. 109-282) and must be made available to Subgrantees, Branches, and HUD within 30 days of making the subaward or allocation.
5. **Conflicts of Interest.** See 24 C.F.R. Part 214 and Handbook 7610.1 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.
6. **Tax Exempt.**
Applicants, Subgrantees, and Branches must be:
 - a. Exempt from taxation under Internal Revenue Code (IRC) Section 501 (a) as an entity described in IRC Section 501(c) (26 U.S.C. § 501 (a) and (c)), or units of local, county, or state government.
 - b. In good standing under the laws and regulations of the state of their organization.
 - c. Authorized to do business in the states in which they propose to provide housing counseling services.
 - d. Approved by HUD, in accordance with this part and 106(e) of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701x(e)), to provide housing counseling services to clients directly, or through their affiliates or branches. This requirement is not applicable to the HCT Program.
7. **System of Award Management (Sam.gov) and UEI Registration Requirement.** Applicants must have a valid and active registration in Sam.gov. In addition, applicants and subgrantees must have a valid and active UEI Number.
8. **Outstanding Performance Issues.** Applicants and Subgrantees must resolve all outstanding issues communicated by HUD in writing by the later of the application deadline date of this NOFO or the expiration date of any conditional re-approval or inactive status resulting from such written communication.
9. **Election for Federal Office Violation.** No Applicant, Subgrantee, or Branch shall employ an individual who has been convicted of a violation under Federal law relating to an election for Federal office. See 12 U.S.C. 1701x(a)(4)(D).
10. **Compliance with Third Party Certifications and Licensing.** Applicants must comply with, and not be in default under, any applicable state or other licensing and certification requirements. HUD will review individual circumstances upon request.

B. Cost Sharing or Matching

This Program does not require [cost sharing or matching](#).

III. PROGRAM DESCRIPTION

III. Program Description

A. Purpose

B. Goals and Objectives

C. Authority

D. Unallowable Costs

E. Indirect Costs

F. Program History

G. Other Information

III. PROGRAM DESCRIPTION

A. Purpose

To provide support to the housing counseling agencies (HCAs) that provide information, advice, and tools for consumers seeking, financing, maintaining, renting, or owning a home, and to help consumers make informed decisions about their housing options.

B. Goals and Objectives

This **Notice of Funding Opportunity** (NOFO) aligns with HUD's mission, Presidential Actions, and relevant laws. You should consider these goals in your application and to track the success of your project. HUD will monitor compliance throughout the program's duration.

1. The Comprehensive Housing Counseling (CHC) Grant Award

The CHC Grant Program will provide targeted housing counseling and group education in priority areas: rental counseling for HUD-assisted households transitioning to unassisted housing; post-purchase housing counseling for eligible homeowners, disaster preparedness and recovery counseling for HUD-assisted households and eligible homeowners, and homeless prevention counseling services (in accordance with E.O. 14321), including information regarding treatment, recovery, and self-sufficiency. The program will also fulfill statutory requirements for HECM counseling and may include additional activities consistent with administration priorities. HUD recognizes E.O. 14283, The White House Initiative to Promote Excellence and Innovation at Historically Black Colleges and Universities (HBCU Initiative), and as part of this NOFO, the Minority Serving Institutions (MSI) initiative will fund partnerships between housing counseling agencies and MSIs to deliver counseling and education to MSI students, faculty, and staff, and their surrounding communities.

2. Housing Counseling Training (HCT) Grant Award

The goal of the HCT Program award is to maintain a professional and effective housing counseling industry that can meaningfully assist consumers by providing them with the information they need to make informed housing choices and maximize the impact of HUD's Housing Counseling program appropriations.

This is achieved by: (i) Providing financial support to create an increased number of counselor training scholarships and partnerships to conduct training; (ii) Supporting basic and specialized topics of housing counseling training including the core topics for housing counselor certification, rental housing counseling, mortgage delinquency and default counseling, housing counselor workforce development, and disaster preparation and recovery to help meet these perceived needs; (iii) Supporting housing counseling agencies (HCAs) that are in a unique position to help their communities prepare for and recover from a disaster. This can be done by integrating preparedness into their counseling and education activities. Post-disaster, they can use their knowledge of local resources and programs to help clients navigate the complexities of disaster recovery resources and programs; and (iv) Encouraging housing counselor workforce development through programs designed to prepare students for future careers in housing counseling.

The HCT MSI Initiative helps support communities by enabling eligible housing counseling agencies to partner with HBCUs and other MSIs so that these institutions can help their communities address their housing and financial needs and increase the supply of local certified housing counselors.

C. Authority

Funding for this program is provided by the Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4, approved March 15, 2025).

HUD's Housing Counseling Program is authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. § 1701x) (Section 106) and Section 4 of the Department of Housing and Urban Development Act (42 U.S.C. § 3533) as amended. The Housing Counseling Program regulations are codified at 24 C.F.R. Part 214. The Home Equity Conversion Mortgage Program (HECM) 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.

D. Unallowable Costs

Program costs incurred prior to the period of performance start date are not allowed.

E. Indirect Costs

If you expect to charge [indirect costs](#) to the award, submit the Indirect Cost Rate Certification form (HUD-426) with your application.

Project	Instruction
CHC	If you expect to charge indirect costs to the award, submit the Indirect Cost Rate Certification form (HUD-426) with your application.
HCT	If you expect to charge indirect costs to the award, submit the Indirect Cost Rate Certification form (HUD-426) with your application.

If you receive an award, more information about indirect cost rates is outlined in the grant agreement.

F. Program History

- **Combination NOFO with multiple awards.** This NOFO combines requirements from CHC and HCT, previously published as two separate NOFOs.
- **Executive Order Compliance.** This NOFO and all funding opportunities contained in this NOFO align with HUD's mission, Presidential Actions, and relevant laws. Adjustments were made to rating factors to accommodate these priorities.
- **Changes to grant specific application forms and charts.** The two individual grant specific forms, the HUD-9906 (CHC) and HUD-92910 (HCT) have been consolidated into one, combined fillable PDF HUD-9906. This fillable PDF should not be separated

but submitted as is, with applicants only completing the portions relevant to their own application. The fillable PDF includes a cover page with further instructions and identifies the pages in the fillable PDF that are relevant to each application award. Intermediaries, State Housing Finance Agencies (SHFA), and Multi-State Organizations (MSO) will need to submit a completed HUD-9906 Chart A Supplement (Excel). Additionally, HUD-9906 Chart F (Excel) must be submitted by all applicants to identify all non-federal, diversified funding resources available during October 1, 2024 through September 30, 2025 and used to support housing counseling activities.

- **Reimbursement for housing counseling activities.** See section II.A.(2)a(ii)(B)

G. Other Information

This NOFO does not include infrastructure and Build America, Buy America Act (BABA) requirements are not applicable.

IV. APPLICATION CONTENTS AND FORMAT

IV. Application Contents and Forms

A. Standard Forms, Assurances, and Certifications

B. Budget

C. Narratives and Non-Form Attachments

D. Other Application Content

TABLE OF CONTENTS

IV. APPLICATION CONTENTS AND FORMAT

Applications must include three main elements: a) standard forms, assurances, and certifications; b) budget; and c) narratives and other attachments. The content, forms, and format for each element are included in this section.

You may use this section as a checklist to ensure you submit a complete application.

If you don't provide the required documents in the correct format, your application is incomplete.

Do not submit password protected or encrypted files.

Element	Submission Form
Standard Forms, Assurances, and Certifications	Upload using each required form.
Budget	Use the required budget form.
Narratives and Other Attachments	Insert each in the Attachments form.

_____ pages is the total maximum length of all narratives.

A. Standard Forms, Assurances, and Certifications

You must properly complete and submit with your application the standard forms, assurances, and certifications identified below. You can find all forms in the application package or review them and their instructions at [Grants.gov Forms](#). You can also [read more about standard forms](#) on HUD's Funding Opportunities page.

Standard Forms, Assurances, and Certifications are outlined below.

	Standard Forms/Assurances/Certifications	
<p>Submit ONE (1) per Application</p> <p>(Even if your application includes multiple programs)</p>	Submission Requirement	Notes/Description
Application for Federal Assistance (SF-424)	Required to submit with application.	Page limit: Not applicable File name: SF-424 Applicant is to place HCS ID

	Standard Forms/Assurances/Certifications	
Submit ONE (1) per Application (Even if your application includes multiple programs)	Submission Requirement	Notes/Description
		in Box 4, Applicant Identifier
Applicant and Recipient Assurances and Certifications (HUD 424-B)	Required to submit with application and post-award.	Page limit: Not applicable File name: HUD-424B
Applicant/Recipient Disclosure/Update Report (HUD 2880)	Required to submit with application and post-award.	Page limit: Not applicable File name: HUD-2880
Certification Regarding Lobbying Activities	Required to submit with application.	Page limit: Not applicable File name: Lobbying Certification form
Disclosure of Lobbying Activities (SF-LLL)	Required to submit with application, if applicable.	Page limit: Not applicable File name: SF-LLL
Certification for a Drug-Free Workplace (HUD-50070)	Required to submit with application.	Page limit: Not applicable File name: HUD-50070

B. Budget

You must submit a budget with your application to support your project narrative.

At a minimum, your budget must indicate direct and any indirect costs.

You must also submit form HUD-426, based on the requirements in [Section III.E.](#) of this NOFO.

The following chart contains budget requirements for each award. Include a budget narrative with your form.

Budget Form/Document	Submission Requirement	Notes/Description
Comprehensive Housing	CHC applicants are not	Page limit: Not applicable

Budget Form/Document	Submission Requirement	Notes/Description
Counseling (CHC)	<p>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 SF-424, Application for Federal Assistance.</p> <p>If awarded, the Grantee is required to submit additional budget information during grant execution.</p> <p>Page limit: Not applicable</p>	Please see attachments for applicable word count limits.
Housing Counseling Training (HCT)	<p>Applicants will use the program-specific budget form found on form HUD-9906 Chart G2 to report actual expenditures.</p> <p>Applicants are not required to request a specific award amount but will be required to update the budget submitted on form HUD-9906-Chart G2 in order to execute the grant, if an award is made.</p>	<p>Page limit: Not applicable</p> <p>Please see attachments for applicable word count limits.</p>
Indirect Cost Rate Certification (HUD-426)	<p>Required to submit with application and post-award, if applicable.</p>	<p>Page limit: Not applicable</p> <p>File name: ICR Doc.</p> <p>Download form from Instructions package.</p>

C. Narratives and Other Attachments

If applicable, you must upload narrative and other attachments in [Grants.gov](https://www.grants.gov) using the Attachments Form. When using the Attachments Form, you can upload PDF, Word or Excel formats.

Form	CHC Program	HCT Program
SHFA Statutory Authority	SHFAs must submit evidence of their statutory authority to	SHFAs must submit evidence of their statutory authority to

Form	CHC Program	HCT Program
	operate as an SHFA, as defined in this program, 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 HCS and validate the information prior to submitting the grant application.	operate as an SHFA, as defined in this program, 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 HCS and validate the information prior to submitting the grant application.
Response to Rating Factors	Required with the application. The Rating Factors will be answered within the Form HUD-9906.	Required with the application. The Rating Factors will be answered within the Form HUD-9906 – Chart G (Chart G1 through G4).
Form HUD-9906 Charts A-D HUD-9906 Chart A Supplement (Excel) and HUD-9906 Chart F Diversified Funding (Excel)	Required for the CHC program. See Section V.B for details about the Rating Factors for the CHC Award. Applicable to all applicants applying for the CHC Award. Failure to submit the completed Charts will impact the Applicant's ability to reach the minimum fundable score of 75 points.	Not applicable
Form HUD-9906, Chart E MSI Initiative	Applicable to all applicants applying for the CHC program who wish to also apply for the MSI Initiative Award. Failure to submit the completed Chart will result in the applicant not being considered for the MSI Initiative funding.	Not applicable
MSI Initiative Award - Documentation	CHC Applicants applying for the MSI Initiative Award must include documentation as	HCT Applicants applying for the MSI Initiative Award must

Form	CHC Program	HCT Program
	outlined in HUD-9906 Chart E.	include documentation.
Form HUD-9902 Housing Counseling Agency Fiscal Year Activity Report	This applies to newly approved applicants for the Comprehensive Housing Counseling (CHC) Program Award who didn't submit a Form HUD-9902 in the last HUD fiscal year. For more information, please review instructions in Section V, Rating Factor 3A.	Not applicable
Form HUD-9906, Chart G Housing Counseling Training Chart	Not applicable	Review Section V.B. for details about the Rating Factors. Applicable to all applicants applying for the HCT Award. Failure to submit the completed Chart G will impact the Applicant's ability to reach the minimum fundable score of 75 points.
Housing Counseling Training Scholarship Narrative	Not applicable	Review section V.B. for details about the Rating Factors. Applicable to all applicants applying for the HCT Award. Failure to submit will result in the applicant not being considered for HCT-MSI Initiative funding.

D. Other Application Content

N/A

V. APPLICATION REVIEW INFORMATION

V. Application Review Information

A. Threshold Review

B. Merit Review

C. Risk Review

D. Selection Process

E. Award Notices

TABLE OF CONTENTS

V. APPLICATION REVIEW INFORMATION

A. Threshold Review

HUD reviews each application to make sure it meets the following threshold requirements. If you meet all threshold requirements, your application will advance to a merit review. If you fail to meet one or more threshold requirements, your application is not eligible for HUD funding.

1. Eligible Applicant

You must meet the applicant eligibility criteria in this NOFO. Applications from ineligible applicants are not rated or ranked and will not receive HUD funding.

2. Resolution of Civil Rights Matters

Applicants with outstanding, unresolved judgments against them for violations of civil rights laws must resolve those judgments before the application submission deadline or the applicant will be deemed ineligible.

a. An applicant is ineligible for funding if the applicant has received notice of a judgment imposed against them for violations of:

1. the Fair Housing Act or a substantially equivalent state or local fair housing law for discrimination because of race, color, religion, sex, national origin, disability or familial status; or
2. Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974, the Americans with Disabilities Act, or the Violence Against Women Act or substantially equivalent state or local laws.

b. HUD will determine if actions to resolve the judgment taken before the application deadline date will resolve the matter. Examples of actions that may be sufficient to resolve the matter include, but are not limited to:

1. Current compliance with a voluntary compliance agreement signed by all the parties;
2. Current compliance with a HUD-approved conciliation agreement signed by all the parties;
3. Current compliance with a conciliation agreement signed by all the parties and approved by the state governmental or local administrative agency with jurisdiction over the matter;
4. Current compliance with a consent order or consent decree; or
5. Current compliance with a final judicial ruling or administrative ruling or decision.

3. Timely Submission of Applications

Late applications are not eligible for funding. See deadlines in [Section VI of this NOFO](#).

B. Merit Review

HUD expects to evaluate and score your application using the following merit criteria and process. Merit reviewers evaluate and score all applications that pass the threshold review. Merit reviewers may include Federal and non-Federal persons. Reviewers receive a copy of your application to evaluate and score each application separately.

Merit Review Summary

Your application is scored on a 100-point scale. You must receive a minimum score of 75 points to receive HUD funding. If available funds are insufficient to provide funding to all eligible applicants, funding is distributed by rank order of application scores until all available funds have been distributed. HUD reserves the right to adjust the minimum fundable score.

Rating Factor	1. Comprehensive Housing Counseling (CHC) Program	2. Housing Counseling Training (HCT) Program
Rating Factor 1.	8 points	32 points
Rating Factor 2.	17 points	8 points
Rating Factor 3.	45 points	36 points
Rating Factor 4.	30 points	12 points
Rating Factor 5.	Not applicable	12 points
Total Points	100 points	100 points
Policy Preference Initiative	MSI Initiative	MSI Initiative

1. Rating Factors

Your application must include a response to the following criteria.

Rating Factors Details

HUD expects to evaluate and score your application using the following merit criteria and process. Merit reviewers evaluate and score all applications that pass the threshold review. Merit reviewers may include Federal and non-Federal persons. Reviewers receive a copy of your application to evaluate and score each application separately.

a. Comprehensive Housing Counseling (CHC) Award and optional Supplemental MSI Initiative Program - HUD-9906

Scope of Review. HUD will review applications in accordance with the requirements of this program and the Housing Counseling Program. HUD may rely on performance monitoring and audit reports, financial status information, and other information available to HUD to make score determinations. The maximum points for each factor are outlined below.

Applicants that manage networks of counseling agencies should not submit a separate response for each proposed Subgrantee and Branch. Rather, such applicants will be directed to use the Chart A Supplement (Excel), where they will list and describe their funded network:

- If the entity is a Branch of the Applicant's organization, place an "X" in Field A3. If the entity is a Subgrantee, place an "X" in Field A4. Branches that are part of a Subgrantee's organization must not be listed. For each member of the Applicant's funded network, there should be one and only one box checked (i.e., either Field A3 or Field A4, not both). If an Intermediary, SHFA, or Multi-State Organizations (MSO) provides counseling services at their main office, Applicants should list their main office as a Branch.
- Only Subgrantees and Branches that provide housing counseling services should be listed. Subgrantees or Branches that perform only administrative functions should not be listed.
- Subgrantees and Branches that did not provide housing counseling services to a minimum of thirty clients in the previous fiscal year must not be listed. (This requirement does not apply to agencies that offer only reverse mortgage counseling.)
- Intermediaries and SHFAs that award subgrants to counseling agencies that are not HUD-approved must ensure that they meet or exceed HUD's approval standards.
- Upon completion of the HUD-9906 Chart A Supplement (Excel), applicants will transfer the totals onto the HUD-9906 Chart A.

Rating Factor		HUD-9906 Chart	
Rating Factor 1. Capacity of the Applicant		8 points	
Sub - factor A	<p>HECM Average Hours - Duration of the Counseling Session</p> <p>Agencies with HECM Roster counselors will be assessed on the average duration of a counseling session. HUD will use its own records to score this factor.</p>	2	Not applicable
Sub - factor B	<p>Staff Training and Experience</p> <p>Using Chart A, indicate by entering an "X" in the appropriate field if staff have received housing counseling training by HUD or a Training (HCT) NOFO Grantee in the past two (2) years, not including on-the-job training (Field G). Intermediaries, SHFAs, and MSOs must specify this information for each Branch or Subgrantee on the HUD-9906 Chart A Supplement (Excel), and then transfer the totals onto the HUD-9906, Chart A.</p> <p>*****</p> <p>Using Chart A, indicate by entering an "X" in the appropriate field if Housing Counseling Program staff have three (3) or more years experience in their field (Field H). Intermediaries, SHFAs, and MSOs must specify this information for each Branch or Subgrantee on the HUD-9906 Chart A Supplement (Excel), and then transfer the totals</p>	3	Chart A

	onto the HUD-9906, Chart A.		
Sub-factor C	<p>Client Satisfaction and Progress</p> <p>Scoring of this sub-factor will reward Applicants that measure customer satisfaction and progress. Using Chart A, indicate by entering an “X”:</p> <ul style="list-style-type: none"> Issued client exit surveys at the end of counseling or education sessions or issued follow-up client surveys after the counseling was completed (Field I) Applicant maintains evidence of client progress in the client file as part of follow-up (Field J) <p>Intermediaries, SHFAs, and MSOs must specify this information for each Branch/Subgrantee on the HUD-9906 Chart A Supplement (Excel) and then transfer the totals onto the HUD-9906 Chart A.</p>	3	Chart A
Rating Factor 2. Need and Advancement of Program Priorities		17 points	
Sub-factor A	<p>Rural Communities, MSI Partnerships, and Opportunity Zones</p> <ul style="list-style-type: none"> HUD will use agency-reported data to determine the extent that an Applicant (and, if applicable, its network) serves clients from a “rural area” (as defined by the U.S. Department of Agriculture at 7 C.F.R. § 3550.10). HUD will use its own records to score the rural communities sub-factor. To be considered for MSI Initiative funding, Applicants must meet the minimum fundable score required by the CHC grant and provide a complete response to all questions on the HUD-9906, Chart E. Each response will be weighted as part of the scoring for this sub-factor. Failure to submit a fully completed Chart E may result in ineligibility for MSI Initiative funding. Applicants must complete Chart B, Field A, if the Applicant’s main office and/or its network provide services within an Opportunity Zone and what housing counseling services are provided in the areas designated as Opportunity Zones. For purposes of scoring, include no more than five (5) eligible census tracts. Opportunity Zones can be identified at https://www.hud.gov/opportunity-zones 	7	Chart B Chart E
Sub-factor B	<p>Experience Working with HUD-Assisted Households and Eligible Homeowners</p> <p>Applicants must describe their experience working with HUD-assisted households and eligible homeowners. Examples include</p>	8	Chart B

	renters assisted through the Housing Choice Voucher, Project-Based Rental Assistance, and Public Housing programs, as well as Federal Housing Administration (FHA)-insured borrowers (see Appendix I definitions). Applicants should highlight their success in helping renters transition from HUD-assisted housing to stable, secure, non-assisted housing; and/or assisting homeowners in preventing or resolving mortgage delinquency; and/or providing non-delinquency post-purchase counseling on issues such as home maintenance and financial management, budgeting, and refinances. (Chart B, Field B)		
Sub - fact or C	Emergency Preparedness and Recovery Emergency preparedness and disaster recovery activities must be included within the agency's Work Plan. Applicants must describe their experience assisting individuals and families with disaster preparedness counseling, resilience building, and post-disaster recovery counseling. Applicants should explain how the agency plans to help clients reduce long-term recovery costs and minimize the financial impact on federal resources. (Chart B, Field C)	2	Chart B
Rating Factor 3. Soundness of Approach		45 points	
Sub - fact or A	Clients Served HUD will evaluate the total number of clients served by the Applicant as reported in its HUD-9902 for Fiscal Year 2024. Applicants who were newly approved after September 30, 2024, and therefore were not required to submit a form HUD-9902 covering this period, must prepare and submit a Form HUD-9902 as part of the application. Such agencies must ensure that their HUD-9902 data reflects the entire Fiscal Year 2024, and not just that portion for which the agency was HUD-approved.	14	Not applicable
Sub - fact or B	Cost per Client HUD will evaluate the Applicant's housing counseling program total actual expenses for the period October 1, 2023, through September 30, 2024, which includes salaries and fringe of housing counselors and staff who provide counseling or group sessions, other direct costs, and indirect costs. Applicants must document their total housing counseling program expenses in Chart D, which includes all funding sources for its housing counseling program during the time	4	Chart D

	period requested, not just OHC funding. MSOs, SHFAs, and Intermediaries must include total program expenses for their entire proposed network. Applicants may provide a narrative explanation of an inordinately high cost per client (Chart D Adjustment Point (Optional)).		
Sub - factor or C	<p>Counseling Expense Ratio</p> <p>HUD will calculate the ratio of counseling and education costs to total program expenses.</p>	3	Chart D
Sub - factor or D	<p>Diversified Funding Sources in the CHC Grant</p> <p>HUD housing counseling grants are not intended to fully fund an applicant's housing counseling program, or that of its subgrantees. Agencies must maintain a level of funds that enables it to provide housing counseling whether or not the agency receives HUD funding (24 C.F.R. 214.303(i)).</p> <p>Applicants will be evaluated based on their ability to show that they have obtained additional resources for their housing counseling activities, for the period October 1, 2024 –September 30, 2025, including: direct financial assistance, program income, and in-kind contributions: equipment, office space, labor; etc. Resources must be used for the housing counseling program and may be provided by governmental entities, public or private nonprofit organizations, for-profit private organizations, or other entities committed to providing assistance.</p> <p>Any agency that does not have other resources available will receive zero points for this rating factor. Failure to submit a fully completed Chart F may result in the Applicant receiving zero points for diversified funding. None of these additional resources can be federal funds or federal pass-through funds.</p>	12	Chart F (Excel)
Sub - factor or E	<p>Allocation to Subgrantees</p> <p>Applicants that manage networks of counseling agencies must submit a proposed sub-allocation plan indicating how they will divide their CHC Grant funds among their Branches and Subgrantees, based on percentages of the grant rather than dollar amounts (see Form HUD-9906, Chart A, Fields B and C). Intermediaries, SHFAs, and MSOs must indicate the percentage of the proposed award the Applicant intends to allocate to each Subgrantee and Branch on Chart A Supplement (Excel), Field C and transfer that total to Chart</p>	2	Chart A

	<p>A, Field C. Indicate the percentage of the proposed award the Applicant intends to allocate to itself on Chart A, Field B.</p> <p>Points are awarded to Applicants who sub-allocate a larger percentage of their award. If, after the grants are awarded, a Grantee would like to change its sub-allocation plan, the Grantee must make a request in writing and provide justification.</p>		
Sub - factor or F	<p>Counseling and Financial Education Services</p> <p>HUD will consider the types of housing counseling and education services offered by the agency and/or its network. HUD will use its own records to score this factor.</p>	4	Not applicable
Sub - factor or G	<p>Oversight Activities</p> <p>Applicants must indicate their oversight and quality control activities (Chart C). Items selected in this chart must be included in an agency's quality control plan and may be verified by HUD staff prior to approving grant activity reports and drawdown requests, as well as during performance reviews.</p>	6	Chart C
Rating Factor 4. Achieving Results and Program Evaluation		30 points	
Sub - factor or A	<p>Performance and Housing Counseling System (HCS) Reporting</p> <ul style="list-style-type: none"> HUD will evaluate Applicant compliance with programmatic requirements and oversight results. HUD will use its own records to score this factor. Applicants will be assessed on timely validation of their agency profile in HCS, timely submission of form HUD-9902 reports, and use of their Client Management System (CMS) to submit form HUD-9902 reports (including client level data). HUD will use its own records to score this factor. 	10	Not applicable
Sub - factor or B	<p>Grant Expenditure History</p> <p>HUD will evaluate the Applicant's expenditure history of previously awarded grant funds. Significant delays in grant execution and expenditure, including the need to voluntarily or involuntarily recapture funding, will be taken into consideration. HUD will use its own records to score this factor. Applicants without a previous HUD grant will be awarded full points.</p>	10	Not applicable
Sub -	<p>Counseling Outcomes</p> <p>HUD will evaluate the positive impacts that an Applicant's housing</p>	10	Not applicable

factor C	counseling services had on clients. HUD will use its own records to score this factor.		able
----------	--	--	------

b. Historically Black Colleges and Universities, Tribal Colleges and Universities, and other Minority Serving Institutions

To receive consideration for funding dedicated for HBCUs and other MSI funding, Applicants must meet the minimum fundable score required by the CHC grant and provide a complete response to all questions on the HUD-9906, Chart E. Each response will be weighted as part of the scoring for this rating factor. Failure to submit a fully completed Chart E may result in ineligibility for MSI initiative funding.

HUD will use the program application score; narrative response on the Form HUD-9906, Chart E; and other factors to rate and rank applications. Depending on factors such as the number of eligible Applicants and other factors, HUD reserves the right to fund less than the amount requested in the application.

Eligible Activities. The eligible activities are outlined in Section II.A.2.a.ii.A, Funding Restrictions of this program.

Maximum Award Amounts. Eligible Applicants must indicate a maximum grant request that will be considered as a cap in establishing the maximum award. An eligible Applicant can request up to \$250,000 as an HBCU or other MSI, or for its partnership and/or its subgrantee partnership with an HBCU or other MSI. The Applicant may also request up to \$150,000 for each additional partnership and/or its subgrantee partnership with an HBCU or other MSI.

Review and Selection Process. Eligible Applicants interested in this funding must complete the following information on Form HUD-9906, Chart E.

1. **Number of Clients Served.** How many housing counseling clients the Applicant or the Applicant's network of HBCUs or other MSIs partners plan to serve with the funding during the period of performance (Chart E, Field 2).
2. **Award Amount (Budget).** Provide the total amount of funds requested for these purposes, and if applicable, indicate the amount allocated to each partnership (Chart E, Fields 3 and 4)
3. **Statement of Work.** Applicants must describe the following:
 1. All proposed eligible activities and major tasks required to successfully implement the proposed initiative (Chart E, Field 5a).
 2. The extent to which there is a need to fund the proposed initiative and the importance of meeting the need(s) (Chart E, Field 5b).
 3. The relevant experience and capacity of the Applicant, its staff, and HBCU or

other MSI partners in implementing the proposed eligible activities (Chart E, Field 5c).

4. How the Applicant will measure the outcomes on the target population by the end of the grant performance period (Chart E, Field 5d).
5. How the Applicant proposes to integrate the institution's students and faculty into proposed eligible activities (Chart E, Field 5e).
6. How the community (e.g., businesses, residents, and others) will be involved in the implementation of the program and how the institution will expand its role in the target community (Chart E, Field 5f).
7. The other resources (not including HUD's CHC Grant) that support or fund the Applicant's existing housing counseling related partnerships with HBCUs or other MSIs. Include the dollar amounts of support provided, if applicable (Chart E, Field 5g).

c. The Housing Counseling Training (HCT) Award and Optional Supplemental MSI Initiative Award - HUD-9906 Chart G

Your application must include a response to the following criteria, using HUD-9906 Chart G. The maximum points available are outlined below. The total available is 100 points. HUD reminds applicants that responses are subject to verification.

Rating Factor		HUD-9906 Chart G	
Rating Factor 1. Capacity of the Applicant This rating factor addresses the Applicant's capacity and experience in providing training services for housing counselors based on past and proposed training activities and outcomes.		32 points	
Sub-factor A	Capacity/Experience of the Organization Agencies with HECM Roster counselors will be assessed on the average duration of a counseling session. HUD will use its own records to score this factor. Using HUD-9906 Chart G1, Proposed and Past Performance. All Applicants must provide the requested information for all housing counseling training courses, including those required for certifications such as foreclosure and advanced foreclosure certification that the Applicant and any Applicant partners provided during the prior period of performance, October 1, 2024 through September 30, 2025. See instructions for completion on Chart G1, Proposed and Past Performance. Also indicate in the narrative response:	13	Chart G1 + Narrative

	<ul style="list-style-type: none"> • Total years of experience by the Applicant as an organization providing housing counseling training and total number of housing counselors who have participated in your training program in the last three grant years, October 1, 2022, to September 30, 2025. • Total years of experience by the Applicant as an organization providing web-based (interactive or non-interactive), or other forms of remote training; • Average years of housing counseling trainer experience for proposed trainers; and • Relevant experience providing training in a manner that is effective for persons with disabilities, including in-person, web-based, and other forms of remote training. 		
<p>Su b- fac tor B</p>	<p>Performance/Grant Requirements</p> <p>Applicants that did not receive a HUD Comprehensive Housing Counseling grant or HUD Housing Counseling Training grant during the period of October 1, 2024 through September 30, 2025 must provide a response to this sub-factor. Previous HUD grantees may respond to this sub-factor, but are not required to do so, as HUD may utilize its own records to score these compliance issues. In scoring this section, HUD will evaluate performance relative to goals and how well the Applicant has satisfied the requirements, including reporting, on HUD or other grants received. If an Applicant did not receive a HUD Housing Counseling Training grant for the period October 1, 2024 through September 30, 2025, the Applicant should base its response on activities and requirements under HUD's Housing Counseling program, other HUD grants, or other sources of funding, such as other federal, state, local, or other awards. For non-HUD training grants, provide contact information of funding providers.</p> <ul style="list-style-type: none"> • Goals and Accomplishments. Describe performance relative to quarterly and annual reports submitted for FY 2024 training grant awards or other goals set during the FY 2024 period of performance (October 1, 2024 through September 30, 2025), and approved extensions. Indicate whether funds were fully spent, goals were met, and explain why they were not, if applicable. If an extension was required, explain reason(s) for not expending funds within the grant period. • HUD Oversight / Audits / Financial and Administrative Reviews. Significant findings on oversight, Financial and 	<p>8</p>	<p>Chart G1 + Narrative + Internal Data</p>

	<p>Administrative Reviews and audits conducted by HUD staff, HUD contractors and/or HUD's Inspector General will be taken into consideration when scoring this section. Significant findings may suggest an Applicant has operated its agency in a manner inconsistent with the Housing Counseling Program or other HUD program requirements, including waste, fraud and abuse of grant funds and fair housing or other civil rights requirements. HUD will develop and apply a scoring scale based on the number of significant findings documented during a review(s) and/or audit(s), and incidence of repeat findings, complaints, etc. HUD will also factor in the Applicant's responsiveness to findings and implementation of corrective action, as well as substantiated complaints received about the organization. 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. For agencies not receiving a HUD grant, provide information and documentation pertaining to oversight / audits of governing entities.</p>		
Sub-factor C	<p>Measuring Student Feedback</p> <p>Scoring in this section will reward Applicants that measure student feedback and make course and/or test adjustments as a result of student feedback. In addition to completing Chart G1, Field 4, Applicants must attach a separate narrative that:</p> <ul style="list-style-type: none"> i. Describes the process to collect student feedback data; ii. Summarizes data collected during the FY 2024 period of performance, October 1, 2024 through September 30, 2025; iii. Attach a copy of the data collection instruments utilized, if applicable; and iv. Describes the course and/or test adjustments made as a result of student feedback during the FY 2024 period of performance, October 1, 2024 through September 30, 2025. 	6	Chart G1 + Narrative
Sub-factor D	<p>Scholarships</p> <p>Chart G1, Fields 9 and 10 (Past Performance) and Fields 20 and 21 (Proposed) - List the number of scholarships provided during the FY 2024 period of performance, October 1, 2024 through September 30, 2025 and proposed for October 1, 2025 through</p>	5	Chart G1

	March 2027.		
	<p>Rating Factor 2. Need and Advancement of Program Priorities</p> <p>This rating factor addresses the Applicant's assessment of the need for training services for housing counselors and the extent to which the proposed activities described in response to Rating Factor 3 address these needs, in addition to certain Program Priorities.</p>	8 points	
Sub-factor A	<p>Needs Data</p> <p>Answer the following:</p> <p>1) Counselor Needs. Estimate the total number of counselors who may require general housing counseling training in FY2025. Explain how the Applicant estimated this number.</p> <p>2) Training Needs. Describe and document the overall need and demand for each of the proposed training activities and delivery methods (place-based, online-interactive, and on-line non-interactive) based on current market conditions.</p> <p>3) Rural Community Training: Rural Areas are defined by the U.S. Department of Agriculture at 7 C.F.R. 3550.10. Applicants must also describe how its housing counseling training program will train counselors who serve consumers in these areas.</p> <p>4) Opportunity Zone Training: Applicants must also describe how its housing counseling training program will train counselors who serve consumers in these areas. For purposes of scoring, include no more than five (5) eligible Opportunity Zone census tracts. Opportunity Zones can be identified at https://www.hud.gov/opportunity-zones.</p>	6	Narrative
Sub-factor B	<p>Program Priorities:</p> <p>The total number of points an Applicant can receive under this sub-factor is two (2). Each priority addressed below has a point value of one (1) point. An Applicant may address as few or as many of the priorities as they wish. It is up to the Applicant to determine which combination of priorities is addressed. Regardless of the combination selected, a maximum of two (2) points is available. Applicants must limit responses to 500 words per program priority.</p> <p>The following priorities apply to the Housing Counseling Training funding for the purpose of this program. Indicate if, and describe how, the Applicant's training work plan substantively addresses</p>	2	Narrative

	<p>the program priority.</p> <p>1. Client Self-Sufficiency Planning</p> <p>Applicants may earn one (1) point by offering training that equips housing counselors to integrate employment and workforce placement strategies into housing counseling sessions. Training should enable counselors to support clients in identifying actionable steps to better employment and or less reliance on government assistance, including self-sufficient, unsubsidized housing.</p> <p>2. Lead-Based Paint Risk Education</p> <p>Applicants may earn one (1) point by describing how they will train housing counselors to inform clients about lead-based paint. Housing counselors that provide education or counseling regarding Pre-Purchase/Home Buying, or Locating, Securing, or Maintaining Residence in Rental Housing, are to be encouraged to inform clients about their rights and responsibilities under the HUD Lead-Based Paint Disclosure Rule (24 C.F.R. Part 35, Subpart A), and, if the rental or purchase may be HUD-assisted, requirements of 24 C.F.R. Part 35, Sub-parts B, K, and R.</p>		
	<p>Rating Factor 3. Soundness of Approach/Scope of Housing Counseling Training Services</p> <p>This rating factor addresses past performance and the quality and effectiveness of the proposed work plan. In rating this factor, HUD will evaluate the extent to which the Applicant presents a detailed and sound approach for providing the proposed services. HUD will also evaluate the extent to which the Applicant demonstrates the cost-effectiveness of its activities and explains how the proposed activities will yield long-term results.</p>	36 points	
Sub-factor A	<p>Past Performance - Impact</p> <p>To score this factor, HUD will analyze the actual expenditures and cost per student during FY 2024 period of performance of October 1, 2024 through September 30, 2025.</p> <ul style="list-style-type: none"> <u>Actual Expenditures</u> - HUD-9906 Chart G2 Budget - HUD will evaluate the Applicant's submitted detailed, comprehensive report of actual expenditures from all funding sources during the FY 2024 period of performance of October 1, 2024 through September 30, 2025. At a minimum, the report must include salaries, fringe and other benefits, consultant/trainer expenses, travel (staff, trainers), scholarships, rent (office and 	5	Chart G1 + Chart G2 + Narrative

training venues), phone, postage, supplies, technology/equipment, and indirect costs for administration of the Applicant's FY 2024 training program.

Use Chart G2 to submit this information and provide a narrative on actual expenditures. Applicants must explain expenses in excess of fifteen percent (15%) of the overall budget that did not result in the direct provision of training services and were not supported by an approved NICRA or an indirect cost rate. Narrative must be provided to receive full points. If the Applicant did not receive a HUD Housing Counseling Program Training Grant during this time period, provide this information based on the Applicant's entire training budget for the same period. If applicable, the report should also include sub-grants or allocations to Training Partners.

- Cost per Counselor - HUD-9906 Chart G1 Past Performance - Calculate the cost per counselor by dividing the Total Expenditures (All Sources) on Chart G2, Budget by the total number of counselors shown in Chart G1, Field 2, Past Performance. Enter this number in Chart G1, Field 11. Explain any factors that may have impacted the cost per counselor such as number and type of scholarships, locations, or other training expenses.
- Scholarships - Describe in a narrative the number of scholarships and percentage of the HUD Housing Counseling Program Training grant was spent on travel, lodging, and/or tuition during the FY 2024 period of performance (October 1, 2024 through September 30, 2025). If the Applicant did not expend a HUD Housing Counseling Program Training grant during this time period, provide this information based on the applicant's entire training budget for the same period. If applicable, explain any adjustments made to allocation of scholarships based on changed needs. Also include the number and type of counseling scholarships issued for housing counseling certification, HECM default counseling, Disaster Prevention and Recovery, and scholarships issued to persons enrolled in a HUD certified housing counselor workforce development program sponsored by the HCT grantee and an institution of higher education including, but not limited to, an HBCU, Tribal College and University (TCU) or other MSI made available during the period of performance (October 1,

	2024 through September 30, 2025), if applicable.		
Sub-factor B	<p>Work Plan – Proposed Performance</p> <p>The Work Plan must describe in detail how the Applicant plans to develop and administer the proposed training services, including administrative tasks, marketing, scholarships, and compliance with all required fair housing and civil rights provisions, while ensuring compliance with the Federal Electronic and Information Technology Accessibility and Compliance Act, Section</p> <p><u>1. Housing Counseling Training.</u> The Applicant must describe via narrative each course it plans to offer and indicate which of the housing counseling Eligible Activities listed in Appendix VI the Applicant proposes to address in each course. Applicants must denote any national standards that may have been incorporated into the development of the curriculum. HUD will award higher points to those Applicants that include courses that support Disaster Preparation and Recovery, Housing Counseling for Renters, Foreclosure Prevention, Financial Stability, and Sustainable Home Ownership.</p> <p><u>a. Proposed Curriculum</u> - HUD-9906 Chart G1, Past and Proposed Performance. Complete this chart and provide the following:</p> <p>1) Provide a summary list of proposed courses.</p> <p>2) Provide a course outline (no more than 2 pages per course) with the following information:</p> <ul style="list-style-type: none"> • Course title. • Brief course description. • Delivery type. • Instructional goals. • Course length for classroom and web-based sessions. • All course topics to be covered and learning objectives for each course. Learning objectives must encompass comprehension, application, analysis, and synthesis cognitive levels of learning. • Understanding and comprehension explaining how learning checks are incorporated into classroom and web-based courses. • Privacy and security policies in place to ensure 	15	Chart G1 + Narrative

	<p>counselors taking remote training courses are protected, and how the remote training will be conducted in a way that verifies the identity of the student and eliminates the opportunity for fraud, cheating, and any other circumstances that would result in questioning the veracity, impact, and applicability of the training.</p> <ul style="list-style-type: none"> • Identify what criteria, including a course examination, will be established for successful completion of the course. • If applicable, indicate the type of counselor certification this course will be used for. • Describe the process through which curriculum is developed. Describe research conducted and indicate experts consulted for curriculum or test content development. <p><u>b. Administrative Staff and Trainers.</u></p> <ul style="list-style-type: none"> • Number of administrative staff devoted to training program management for training activities under the application. • Number of trainers to be utilized for the proposed courses. • Describe how trainers are selected and the specific selection criteria employed. • Describe how the Applicant will monitor trainers including student feedback. <p><u>c. Delivery Methods.</u> As outlined in HUD-9906 Chart G1, Proposed Performance, indicate the delivery method to be used for each course to be offered, (in-person, web-based interactive, or web-based non-interactive). Indicate the number of proposed courses to be offered (Chart G1, Field 12) and the number of counselors to be trained (Chart G1, Field 13).</p> <p><u>d. Marketing / Enrollment.</u> Applicants must describe plans to market the training and register counselors. Describe policies and plans to ensure training enrollment and assistance provision is open and fair. For example, how will you ensure that enrollment, eligibility and scholarships may not be restricted to affiliates or branches of a specific intermediary or conducted in a way that favors affiliates or branches of a particular organization. Describe how marketing efforts contribute to ensure that existing housing counseling capacity is preserved and expanded. Describe how marketing, enrollment, registration, and requests</p>		
--	--	--	--

	<p>for assistance services or reasonable accommodation will effectively communicate with persons with disabilities.</p> <p><u>e. Federal Electronic and Information Technology Accessibility and Compliance Act, Section 508.</u> Applicants offering training online must describe how they comply with Section 508 requirements. Please visit https://www.section508.gov/ for more details.</p>		
<p>Su b- fac tor C</p>	<p>Scholarships and Fees</p> <p>Applicants must describe scholarships and fees for each proposed activity described within this Work Plan.</p> <p><u>(a) Scholarships.</u> The proposal must include a scholarship element, detailing the full or partial costs to be covered, including travel (lodging, transportation and per diem), and tuition to be awarded to housing counselors. Indicate if scholarships will be made available to:</p> <ul style="list-style-type: none"> i. Counselors and staff employed by housing counseling agencies participating in HUD's Housing Counseling program; ii. Individuals enrolled in HUD certified housing counselor workforce development programs, including military veterans and transitioning service members, administered by the HCT grantee. Individuals must be sponsored by a HUD participating housing counseling agency to qualify; and/or iii. Individuals enrolled in a HUD certified housing counselor workforce development program sponsored by the HCT grantee and an institution of higher education including, but not limited to, an HBCU, TCU, or other MSI, as additional funds may be available for these scholarships. <p>Describe the types of scholarships that will be offered to students both through this program, as well as through diversified (non-federal) funding resources, and the methodology applied for issuing scholarship awards. Discuss plans to maximize the number of scholarships awarded. Estimate what percentage of the proposed budget will be earmarked for scholarships, with a breakdown for tuition and travel (lodging, transportation and per diem). Applicants must also describe plans for determining how the various types of scholarship assistance will be distributed based on the needs identified in Rating Factor 2 including assistance for counselors in rural areas, while also reducing travel costs for local participants or areas with limited housing counseling resources.</p>	<p>10</p>	<p>Narra tive</p>

	<p>Describe the methodology used to determine types of scholarships made available to Applicants at the beginning of the application process. Include the anticipated number and type (lodging, tuition only, tuition & travel) of each type of counseling scholarship noted above that will be made available during the grant period of performance October 1, 2025 through March 31, 2027.</p> <p><u>(b) Fees.</u> If applicable, indicate the fee the Applicant plans to charge for each proposed activity for those students that do not receive a scholarship for tuition.</p>		
Sub-factor D	<p>Training Partners</p> <p>See definitions of Training Partners in Appendix I Program Definitions, and Sub-grantees in Appendix I., Program Definitions.</p> <p>In HUD-9906 Chart G4, list the name of the identified sub-recipients and/or Training Partners that will enable the Applicant to successfully implement the proposed work plan and explain in a narrative the role each partner will play in logistical support, marketing and outreach for the proposed activities and the impact on cost-effectiveness. Participation by training partners shall be limited to services procured by Grantees and Sub-grantees. Applicants may utilize in-house staff, sub-recipients, consultants, and Training Partners with requisite experience and capacity. Indicate the partner's name, type of entity, contact person and phone number of partner, number of events, if the partner is past and/or proposed and the amount of funding the Training Partner contributed or will contribute to that training. This section will be scored on the number of Training Partners identified for past and proposed training programs, their role in the proposed training, and their demonstrated experience in past training. Their contributions for proposed training plans will be included as diversified funding sources for Rating Factor 4.</p> <p>a. <u>Past Training Partners</u> - Provide information on the number of partnerships that were created during the period of October 1, 2024 through September 30, 2025, including the extension period of performance, if applicable, and what each partner contributed to assist in providing more training opportunities for counselors and/or reduced the cost and/or burden to the grantee.</p> <p>b. <u>Proposed Training Partners</u> - Identify Training Partners proposed for FY 2025 that will assist in providing more training opportunities for counselors and/or reduce the cost and/or</p>	3	Chart G4,

	burden to the grantee as indicated in HUD-9906 Chart G4. Those Applicants that have established Training Partners will score higher on this sub factor.		
Su b- fac tor E	<p>Management Activities</p> <p>Applicants must describe management activities that will be performed as part of the projected work plan, including monitoring and oversight of agency staff and if applicable, sub-recipients and/or Training Partners. Also describe what process will be used to select proposed sub-recipients and/or Training Partners and to determine sub-funding levels.</p>	3	Narra tive
Rating Factor 4. Diversified Funding Sources		12 points	
Su b- fac tor A	<p>Itemized Diversified Funding Sources</p> <p>Although HUD funding through this program may fully fund an organization's proposed HCT program, Applicants are encouraged to secure the use of other resources to supplement the HUD award. Points for this Rating Factor will be awarded based on the amount of diversified funding resources that meets the criteria in this section. Applicants that can demonstrate diversified funding resources from Training Partners described in Rating Factor 3B, will receive higher scores in this factor. Applicants who have no other resources available will receive no points for this Rating Factor. Do not include the same diversified funding identified for the FY 2025 Comprehensive Housing Counseling Program.</p> <p>Applicants will be evaluated based on their ability to show that they have obtained additional non-Federal resources for their housing counseling training activities, for the period, including: direct financial assistance (grants); fees; and in-kind contributions such as services, equipment, office space, labor; etc. Resources may be provided by non-federal government sources, public or private non-profit organizations, for-profit private organizations, or other entities committed to providing assistance. Grantees will be required to maintain evidence that diversified funding resources cited in this application were actually provided to the agency. Funding files and/or diversified funding resource documentation will be reviewed by HUD staff as a part of the performance reviews and on-site monitoring visits.</p> <p>Do NOT include funding from federal sources such as, but not limited to, the Community Development Block Grants (CDBG), Fair Housing Initiatives program (FHIP), and HOME Investment</p>	12	SF- 424 + Chart s G3 and G4

<p>Partnerships program (HOME).</p> <p>Attorneys General Mortgage Settlement funds are not considered Federal and therefore can count toward diversified funding resources.</p> <p>A. Diversified Funding Sources. Utilize the following charts and provide the following information:</p> <ul style="list-style-type: none"> • HUD-9906 Chart G3 - Diversified Funding (3 points) • HUD-9906 Chart G4 - Training Partners (2 points) <p>All Applicants must itemize the list of diversified funding resources for the Applicant itself, and for each proposed sub-grantee and identified Training Partners. All Applicants must provide a list of all proposed sub-grantees they propose to fund and itemize for each the names of the organizations providing all diversified funding resources and in-kind contributions. Include the total amount and the source of funds. Applicants must also list all Training Partners collaborated with during the previous performance period (October 1, 2024 – September 30, 2025) and proposed during the upcoming performance period (October 1, 2025 – March 31, 2027), using funds earmarked by the Training Partners to support housing counseling training. Applicants that fail to provide this information may not receive any points for this factor. All diversified funding resources claimed by an Applicant, including cash and third party in-kind, must meet all of the criteria set forth in 2 C.F.R. Part 200. Responses should be consistent with the funds total estimated funding amount shown on the SF-424, and the documentation for this Rating Factor. Resources provided by the Applicant may count as diversified funding resources. These amounts must include only funds that will directly result in the provision of housing counseling training. These funds must also be reflected in the SF-424.</p> <p>B. Fees. While agencies are strongly encouraged to aggressively seek funds from other private and public sources, fee income can be counted as diversified funding resources. Applicants claiming fee income must project the total income anticipated from fees. Fee income should be identified as program income on line 18, Estimated Funding, f. Program Income of SF-424 "Application for Federal Assistance".</p>		
<p>Rating Factor 5. Achieving Results and Program Evaluation</p> <p>This Rating Factor emphasizes HUD's determination to ensure that Applicants meet the commitments made in their</p>	<p>12 points</p>	

<p>applications and cooperative 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.</p>			
<p>Su b- Fa cto r A</p>	<p>Evaluation Plan</p> <p>In responding to this factor, Applicants must indicate how they evaluate the impact of the training program. The Applicant must describe an evaluation plan that explains what will be measured, how an Applicant is going to measure it, and the steps in place to adjust its work plan if performance targets are not met within established time frames.</p>	4	Narrative
<p>Su b- Fa cto r B</p>	<p>Grant Expenditure History</p> <p>In scoring this section, HUD will utilize its own records to evaluate Applicant compliance with programmatic requirements and expenditure results during the FY 2024 period of performance October 1, 2024 through September 30, 2025. Applicants that were unable to expend HUD grant funds within the designated performance period(s) will not receive full points. If an Applicant has not received a HUD Housing Counseling Training grant for the prior grant period, the Applicant should provide a narrative on activities and requirements under other sources of funding, such as other federal, state, local, or other awards. Provide contact information of all funders. Applicants that were unable to expend grant funds from all sources within the designated performance period(s) will not receive full points.</p>	8	Internal data + Narrative

This NOFO does not offer any preference points.

2. Other Factors

a. Budget

The panel will review but not approve the budget. The panel will assess whether the budget aligns with planned program activities and objectives. Panel members will consider whether the budget and the requested performance period are fully justified and reasonable in relation to the proposed project.

_____. Certification of Consistency with the Consolidated Plan

C. Risk Review

Before making an award, HUD will evaluate each applicant's likelihood of successfully implementing an award based on the following criteria.

- OMB-designated repositories of governmentwide data, as noted in [2 CFR 200.206\(a\)](#)
- History of performance. The applicant's record in managing Federal awards, if it is a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, failing to make significant progress in a timely manner, failing to meet planned activities in a timely manner, conformance to the terms and conditions of previous Federal awards, and, if applicable, the extent to which any previously awarded amounts will be expended prior to future awards
- Reports and findings from audits performed under 2 CFR part 200, subpart F—Audit Requirements or the reports and findings of any other available audits
- The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities
- Capacity of the applicant, including staffing structures and capabilities
- History of timely completion of activities and receipt and expenditure of promised matching or leveraged funds
- Ability to promote self-sufficiency and economic independence
- Ability to produce positive outcomes and results
- Other public sources such as newspapers, Inspector General or Government Accountability Office reports or findings, or other complaints that have been proven to have merit
- History of subsidizing or facilitating activities that conflict with the purposes of this NOFO

HUD may reduce scores based on the past performance review, as specified under V.A. Review Criteria. Whenever possible, HUD will obtain and review past performance information. If this review results in an adverse finding related to integrity of performance, HUD reserves the right to take any of the remedies provided in the [General Statutory and Regulatory Requirements Affecting Eligibility for HUD's Financial Assistance Programs - FY2025 | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

HUD may use the results of the risk review to make funding decisions and to apply award conditions.

D. Selection Process

When making funding decisions, HUD will consider:

- Eligibility requirements, including threshold review results.
- Merit review results.
- Risk review results.

To the extent allowed by law, HUD may:

- Fund applications in whole or in part.
- Fund applications at a lower amount than requested.
- Choose to fund no applications under this NOFO.
- Adjust funding for an application, to ensure funding or geographic dispersion, and alignment with program or administrative priorities.
- Withdraw an award offer and make an offer of funding to another eligible application, if terms and conditions are not finalized or met.
- Use additional funds made available after NOFO publication to either fully fund an application or fund additional applications.
- Correct HUD review and selection errors. If HUD commits an error that causes an applicant not to be selected, HUD may make an award to that applicant when and if funding is available.
- Release another NOFO, if funding is available and if HUD does not receive applications of merit.

1. Comprehensive Housing Counseling (CHC)

Review and Selection Process.

Technical Review. First, a technical sufficiency review will determine whether each application meets the threshold requirements set forth in this program and whether all required forms have been properly submitted. Section VI.C.2 provides the procedures to correct a deficient application.

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

Minimum Fundable Score. All applications will be scored on a 100-point scale. For FY2025, HUD anticipates making awards to all Applicants scoring 75 points or greater from this section. To be eligible for any funding under the program, Applicants must meet the minimum fundable score. If available funds are insufficient to provide grants to all Applicants achieving the minimum fundable score, grants will be awarded in rank order until all available funds have been distributed. HUD reserves the right to adjust the minimum fundable score.

Funding Methodology. Awards will be determined based on performance within HUD's CHC Program and other relevant criteria, as described below.

Applicants may also indicate a maximum grant request (Chart A, Field K) that will be considered as a cap in establishing the maximum CHC award. Separately, Applicants applying for the HBCUs, Tribal Colleges and Universities, and other MSIs initiative must indicate their desired award amount on Chart E.

Although HUD will determine the total award amount for each Applicant, Grantees themselves will determine the actual funding amounts to be distributed to Subgrantees and/or Branches. HUD may adjust the base award according to previous years' CHC grant performance, including timely use of HUD funds and funds recapture.

(a) Competitive Funding Amount. Higher scoring submissions may receive incentive funding.

(b) Funding to Monitor a Network. HUD may augment the award for oversight and quality control activities. HUD may base a portion of this calculation on an Applicant's plan to review members of its funded network using form HUD-9910 and to share results and follow-up actions with HUD (Chart C). Chart C, Field 4 includes a space for Applicants to indicate the number of funded Subgrantees and Branches that they propose to review during the upcoming performance period. The bonus will be capped at the lesser of a) five reviews, or b) 50% or less of the Applicant's funded network.

(c) Number of Counselor FTEs. HUD may augment the award based on the number of HUD-Certified Housing Counselor Full-Time Equivalents (FTEs) that provide housing counseling services as of September 30, 2024 (Chart A, Field D). Applicants that provide counseling services at their main office may count the number of housing counselor FTEs at the main office in addition to the offices of Subgrantees and/or Branches.

(d) Number of Clients Served. HUD may augment the award based on total clients served, as reported on the Applicant's previous fiscal year's HUD-9902.

(e) Funding of Reverse Mortgage Counseling. HUD may augment the award based on the number of HECM Roster Counselors that provide housing counseling services as of September 30, 2024 (Chart A, Field E).

(f) Funding for New HECM Certified Counselors. HUD may provide funding incentives for awardees employing counselors who become HECM-certified during the period of performance. To be eligible for this incentive, the counselors must not have been on the HECM counselor roster prior to the start of the period of performance. Interested applicants shall indicate in their application how many new HECM Roster Counselors the applicants propose to add during the FY2025 period of performance. HUD reserves the right to adjust the incentive based on the proposed number of new roster counselors. HUD shall consider various factors, including the number of new roster counselors proposed by the applicant, the total number proposed by all awarded applicants, each awardee's current capacity and HECM history, and the total amount of funding available for this incentive. (Chart A, Field F).

Funds Recapture. HUD may decrease the award amount if changes to the network size, number of HUD-Certified Housing Counselor FTEs, or services provided would result in a lower amount than was awarded and reserves the right to recapture all or part of the resulting grant. Additionally, HUD may recapture funds unspent in the time allotted.

Mergers, Acquisitions, and Other Changes in Organizational Structure. Anticipated mergers, acquisitions, or other changes in Grantee(s) legal or organizational structure must be reported to Grantee's Point of Contact in HUD's Office of Housing Counseling no later than sixty (60) days prior to the implementation of such changes. However, HUD encourages grantees to report such changes as early as possible to ensure that the organization remains eligible for grant funds. 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(s), 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 demonstrates in its application that it meets all eligibility requirements for a HUD-approved housing counseling agency in Section 106, 24 C.F.R. Part 214, and HUD Handbook 7610.1, including oversight and reporting, housing counseling experience and staffing;
- The newly named entity has a UEI, 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 assigning the award to the new entity is completed; and
- A new LOCCS access form has been filed with the HUD Accounting Office.

Historically Black Colleges and Universities, Tribal Colleges and Universities, and other Minority Serving Institutions.

Review and Selection Process. Eligible Applicants interested in this funding must complete the following information on Form HUD-9906, Chart E.

Number of Clients Served. How many housing counseling clients the Applicant or the Applicant's network of HBCUs or other MSIs partners plan to serve with the funding (Chart E, Field 2).

Award Amount (Budget). Provide the total amount of funds requested for these purposes, and if applicable, indicate the amount allocated to each partnership (Chart E, Field 3).

Statement of Work. Applicants must describe the following.

- All proposed eligible activities and major tasks required to successfully implement the proposed initiative (Chart E, Field 5a).
- The extent to which there is a need to fund the proposed initiative and the importance of meeting the need(s) (Chart E, Field 5b).
- The relevant experience and capacity of the Applicant, its staff, and HBCU or other MSI partners in implementing the proposed eligible activities (Chart E, Field 5c).
- How the Applicant will measure the outcomes on the target population by the end of the grant performance period (Chart E, Field 5d).

- How the Applicant proposes to integrate the institution's students and faculty into proposed eligible activities (Chart E, Field 5e).
- How the community (e.g., businesses, residents, and others) will be involved in the implementation of the program and how the institution will expand its role in the target community (Chart E, Field 5f).
- The other resources (not including HUD's CHC Grant) that support or fund the Applicant's existing housing counseling related partnerships with HBCUs or other MSIs. Include the dollar amounts of support provided, if applicable (Chart E, Field 5g).

Housing Counseling Training (HCT) Review and Selection Process

1. Past Performance

In evaluating applications for funding, HUD will consider an applicant's past performance in managing funds. Items HUD will consider include, but are not limited to:

- OMB-designated repositories of government wide data, as noted in 2 C.F.R. 200.206(a)
- The ability to account for funds in compliance with applicable reporting and recordkeeping requirements
- Timely use of funds received from HUD
- Timely submission and quality of reports submitted to HUD
- Meeting program requirements
- Meeting performance targets as established in the grant agreement
- The applicant's organizational capacity, including staffing structures and capabilities
- Timely completion of activities and receipt and expenditure of promised matching or diversified funding sources
- The number of persons served or targeted for assistance
- Timely use of funds received from HUD

HUD may reduce scores based on the past performance review, as specified under V.D.3. HCT Review Criteria. Whenever possible, HUD will obtain and review past performance information. If this review results in an adverse finding related to integrity of performance, HUD reserves the right to take any of the remedies provided in the [General Statutory and Regulatory Requirements Affecting Eligibility for HUD's Financial Assistance Programs - FY2025 | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

2. Assessing Applicant Risk

In evaluating risks posed by applicants, HUD may use a risk-based approach and may consider any items such as the following:

- (1) Financial stability;

(2) Quality of management systems and ability to meet the management standards prescribed in this part;

(3) History of performance. The applicant's record in managing Federal awards, if it is a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, failing to make significant progress in a timely manner, failing to meet planned activities in a timely manner, conformance to the terms and conditions of previous Federal awards, and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards;

(4) Reports and findings from audits performed under 2 C.F.R. Part 200 Subpart F, Audit Requirements, of this part or the reports and findings of any other available audits; and

(5) The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities.

a. Integrity. HUD evaluates the integrity of the Applicant as reflected in government-wide websites, information in HUD's files, the federal Do Not Pay portal, public information and information received during HUD's Name Check Review process. If this integrity evaluation results in an adverse finding, HUD reserves the right to take any of the remedies provided in Section III.C. Additional Funding Restrictions.

b. Technical Review. First, each application will be reviewed for technical sufficiency to determine whether the application meets the threshold requirements set out in this program and whether all required forms have been submitted. Applications that do not meet the threshold requirements will not be rated and ranked.

c. General Review. The second review considers the responses to the Rating Factors outlined above and other relevant information. Applications will be evaluated competitively and ranked against all other Applicants that applied in the same funding category.

d. Funding Methodology. Within the overall availability of funds, applications that earn a score of seventy-five (75) points or more will receive a base amount, as determined by HUD. The second tier of funding will be based on the total number of HUD scholarships awarded in most recently completed grant period. The third tier of funding will be based on the total number of classes provided during the most recently completed grant period. The fourth tier of funding will be based on the proposed number of HUD scholarships for institutions of higher education including an HBCU, TCU or other MSI.

1. HUD may award the entire amount available under this program to the highest scoring application. However, to provide the highest quality, comprehensive, and nationwide training program, HUD reserves the right to make multiple awards.
2. In the event of multiple awards, awardees will be funded based on a formula determined by HUD.
3. If an Applicant turns down an award offer, HUD may make an offer to the next highest-ranking application.
4. In the event HUD commits a funding error, that when corrected would result in selection of an Applicant during the funding round of a program award, HUD may select that Applicant for funding, subject to the availability of funds.

e. Award Adjustments. HUD reserves the right to adjust funding levels for each Applicant.

E. Award Notices

If you are successful, HUD will email an award notice to the authorized official representative from the SF-424. HUD will also notify unsuccessful applicants.

The award notice communicates the amount of the award, important dates, and the terms and conditions you need to follow. HUD may impose specific conditions on an award as provided under [2 CFR 200.208](#).

You agree to the award terms and conditions by either drawing funds from HUD's payment system or signing the agreement with HUD. If you do not agree to the award terms and conditions, HUD may select another eligible applicant.

As part of the notification process, you are notified of the debriefing process. Additional information about the debriefing process is provided in Section VIII.D of this NOFO.

VI. SUBMISSION REQUIREMENTS AND DEADLINES

VI. Submissions Requirements and Deadlines

- A. Deadlines
- B. Submission Methods
- C. Other Submissions
- D. False Statements

TABLE OF CONTENTS

VI. SUBMISSION REQUIREMENTS AND DEADLINES

You must apply electronically. See [Find the Application Package](#) to make sure you have everything you need to apply online. See [Application Waiver](#) if you qualify to submit a paper application.

Make sure you are current with [SAM.gov](#) and UEI requirements before applying for the award. See the [Before You Begin](#) section of this NOFO.

A. Deadlines

1. Application submission deadline:

The application deadline is 11:59:59 PM Eastern time on:

05/26/2026

HUD must receive your application by the deadline. Applications received after the deadline are late. Late applications are not eligible for HUD funding.

If HUD receives more than one application from you, HUD will review only the last submission.

HUD may extend an application due date based on emergency situations such as Presidentially-declared natural disasters. Improper or expired registration and password issues are not causes to allow HUD to accept applications after the deadline date.

2. Grace Period for Grants.gov Submissions

If [Grants.gov](#) rejects your application before the deadline, you have up to 24 hours after the application deadline to correct and resubmit your application. Any application submitted during the grace period but not received and validated by Grants.gov will not be considered for funding. There is no grace period for paper applications.

B. Submission Methods

1. Electronic Submission

You must register and submit your application through [Grants.gov](#). See [Before You Begin](#).

For instructions on how to submit in [Grants.gov](#), see the [Quick Start Guide for Applicants](#).

Make sure that your application passes the [Grants.gov](#) validation checks or we may not get it.

[Grants.gov](#) will record the date and time of your application submission. HUD will use this information to determine timely applications.

Need Help? See the [Contact and Support](#) section of this NOFO.

2. Electronic Submission Application Waiver

You may request a waiver from the requirement to submit your application electronically. The request must show good cause and detail why you are technologically unable to submit electronically. An example of good cause may include: a valid power or internet service disruption in the area of your business office. Lack of [SAM.gov](#) registration is not good cause.

Use the information in the [Contact and Support](#) section of this NOFO to submit a written

request to HUD. You must **submit your waiver request at least 15 calendar days before the application deadline.**

C. Other Submissions

1. Intergovernmental Review

This NOFO is not subject to Executive Order [12372](#). No action is needed.

2. Technical Application Errors

HUD may contact you to fix a technical error with your timely application after the due date. Technical errors that you may fix are not submitted to satisfy merit review criteria. And you may not fix technical errors related to threshold review except eligibility entity documentation. Examples of technical errors include: inconsistencies in funding requests; improper signature on a form; a missing or incomplete form; and nonprofit status documentation.

HUD will send notice to the authorized organization representative from the SF-424 to fix a technical error.

Your application is not eligible for funding, if you fail to fix the error to HUD's satisfaction and by the due date in HUD's notice. HUD will not review information submitted after the application due date in HUD's notice.

a. Fix Errors in Electronic Applications

To fix an error in response to a HUD notice, you must email the corrections to HUD at applicationsupport@hud.gov. The subject line of the email to applicationsupport@hud.gov must state "Technical Fix" and include the [Grants.gov](#) application tracking number (e.g., Subject: Technical Fix - GRANT123456). If you do not email applicationsupport@hud.gov or if you do not include the appropriate subject line, HUD may mark your application as ineligible.

HUD allows no less than 48 hours and no more than 14 calendar days from the date of the HUD notice to fix an error. If the due date to fix an error falls on a Saturday, Sunday, Federal holiday, or on a day when HUD's Headquarters office in Washington, DC is closed, then the due date is the next business day.

b. Fix Errors in Paper Applications

You must fix an error in your paper application, in accordance with HUD's notice. If your paper application includes an incorrect UEI, HUD will request you supply the correct UEI.

D. False Statements

By submitting an application, you acknowledge your understanding that providing false or misleading information during any part of the application, award, or performance phase of an award may result in criminal, civil or administrative sanctions, including but not limited to: fines, restitution, and/or imprisonment under 18 USC 1001, 18 USC 1012, 18 USC 1010, 18 USC 1014, or 18 USC 287; treble damages and civil penalties under the False Claims Act, 31 USC 3729 et seq.; double damages and civil penalties under the Administrative False Claims Act, 31 USC Sections 3801-3812; civil recovery of award funds; suspension and/or debarment from all federal procurement and non-procurement transactions, FAR Part 9.4 or 2

CFR Part 180; and other remedies including termination of active HUD award.

VII. POST - AWARD REQUIREMENTS AND ADMINISTRATION

VII. Post-Award Requirements and Administration

- A. Administrative, National and Departmental Policy Requirements and General Terms and Conditions
- B. Environmental Requirements
- C. Remedies for Noncompliance
- D. Reporting

VII. POST-AWARD REQUIREMENTS AND ADMINISTRATION

Standard post-award requirements are available online at: Appendix XII to 2 CFR part 200, Award Terms and Conditions for Recipient Integrity and Performance Matters. .

A. Administrative, National and Departmental Policy Requirements, and General Terms and Conditions

You must follow the applicable provisions in the [Administrative, National & Departmental Policy Requirements and Terms for HUD Financial Assistance – 2025](#). You must comply with these applicable provisions:

1. The Fair Housing Act ([42 USC 3601-3619](#)) and Civil Rights laws which encompass the Fair Housing Act and related authorities (24 CFR 5.105(a))
2. Affirmatively Furthering Fair Housing (AFFH) requirements, ([42 USC § 3608\(e\)\(5\)](#)) and implementing regulations at [24 CFR 5.150 et seq.](#) as amended by 90 FR 11020.
3. Economic Opportunities for Low-and Very Low-income Persons ([12 USC 1701u](#)) requirements, including those listed at [24 CFR part 75](#)
4. Compliance with Immigration Requirements (8 U.S.C. 1601-1646; [Executive Order 14218](#))
5. Accessible Technology requirements, ([29 USC § 794d](#), 29 USC 794, 42 USC 12131-12165) and implementing regulations at 36 CFR part 1194 (Section 508 regulations), [24 CFR § 8.6](#) (Section 504 effective communication regulations), 28 CFR part 35, subpart H (DOJ Web Access Rule), and [28 CFR part 35, subpart E](#) (DOJ's Title II communications regulations)
6. Ensuring, when possible, small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms receive consideration consistent with [2 CFR 200.321](#)
7. Equal Participation of Faith-based Organizations in HUD Programs and Activities consistent with 42 U.S.C. 2000bb et seq.; 42 U.S.C. 2000d et seq.; 24 CFR 5.109; and Executive Orders 14202, *Eradicating Anti-Christian Bias* and EO 14205, *Establishment of the White House Faith Office*.
8. Uniform Relocation Assistance and Real Property Acquisition Policies Act ([42 USC § 4601 et seq.](#)) (URA) requirements, [49 CFR part 24](#), and applicable program regulations
9. Participation in HUD-Sponsored Program Evaluation (12 USC 1701z-1; 12 USC 1702z-2; 24 CFR part 60; and FR-6278-N-01)
10. OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR part 200](#))
11. Drug-Free Workplace requirements ([2 CFR part 2429](#))
12. HUD requirements related to safeguarding resident/client files (e.g., [2 CFR 200.303\(e\)](#))
13. The Federal Funding Accountability and Transparency Act of 2006 ([2 CFR part 170](#)) (FFATA), as amended

14. Eminent Domain

15. Accessibility for Persons with Disabilities requirements ([29 USC § 794](#)) and implementing regulations at [24 CFR parts 8](#) and [100](#); [28 CFR part 35](#)

16. Applicable Violence Against Women Act requirements in the Housing Chapter of VAWA ([34 USC § 12491-12496](#)) [24 CFR part 5, subpart L](#), and program-specific regulations.

17. Conducting Business in Accordance with Ethical Standards/Code of Conduct, including [2 CFR 200.317](#), [2 CFR 200.318\(c\)](#) and other applicable conflicts of interest requirements

18. [Build America, Buy America \(BABA\) Act](#) procurement purchase requirements

19. [Section 106\(g\) of the Trafficking Victims Protection Act of 2000 \(TVPA\), as amended \(22 USC § 7104\(g\)\)](#) and implementing regulations at [2 CFR part 175](#)

20. Environmental requirements that apply in accordance with [24 CFR part 50](#) or [part 58](#)

21. Prohibition on Certain Telecommunication and Video Surveillance Services or Equipment (41 USC § 3901 note prec., 2 CFR 200.216)

22. Unless prohibited by law and to the extent permitted under the Freedom of Information Act (FOIA), your application and post-award content may be released to the public in response to FOIA requests, except to the extent that certain information may be withheld under a FOIA exemption ([5 USC § 552\(b\)](#); [24 CFR 15.107\(b\)](#)). HUD may also share your information within HUD or with other Federal agencies if HUD determines that sharing is relevant to the respective program's objectives.

23. Waste, Fraud, Abuse, and Whistleblower Protections. [41 USC § 4712](#), which includes informing your employees in writing of their rights and remedies, in the predominant native language of the workforce. Under [41 U.S.C. § 4712](#), employees of a contractor, subcontractor, grantee, subgrantee, and personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant. (See [Federal Contractor or Grantee Protections | Office of Inspector General, Department of Housing and Urban Development \(hudoig.gov\)](#))

24. Implementing Presidential Executive Actions affecting federal financial assistance programs, as advised by the Department, unless otherwise restricted by law: Executive Order (EO) [14219](#) (Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative); [14218](#) (Ending Taxpayer Subsidization of Open Borders); guidance resulting from the White House Task Force established by [14202](#) (Eradicating Anti-Christian Bias) and the Senior Advisor to the White House Faith Office assigned by [14205](#) (Establishment of the White House Faith Office); [14182](#) (Enforcing the Hyde Amendment); [14173](#) (Ending Illegal Discrimination and Restoring Merit-Based Opportunity); [14168](#) (Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government); [14151](#) (Ending Radical and Wasteful Government DEI Programs and Preferencing); and [14148 \(Initial Rescissions of Harmful Executive Orders and Actions\)](#)

25. If any part or provision of the grant Agreement or terms of this Notice have been or are enjoined or held to be void or unenforceable by a federal court, they shall be ineffective only to the extent of such court's authority and only as to such prohibition or injunction and shall not invalidate or affect the legality or enforceability of the remaining provisions and applications of the Agreement and Notice. In the event the injunction of such provisions is stayed, dissolved or reversed, the full terms of the grant agreement and Notice, including such provisions, will automatically become effective.

26. All agreements or contracts made with subrecipients under this NOFO must contain the identical terms and conditions as those in the grant agreement issued by HUD. Any additional or conflicting terms and conditions must be approved by HUD.

27. In monitoring Grantee's compliance under the terms of the NOFO, HUD can review the use of the diversified funding sources provided by the Applicant in Rating Factor 3 Sub-Factor D for the CHC program.

B. Environmental Requirements

1. Environmental Review

Activities funded under this NOFO are exempt or categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 USC § 4321) and not subject to environmental review under related laws and authorities. The exemption or categorical exclusion is in accordance with 24 CFR 50.19.

2. NOFO Impact Determination Related to the Environment

This NOFO provides funding under 24 CFR 50.19(c)(5)(ii) which concerns activities that are listed in [24 CFR 50.19\(b\)](#) as categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 USC § 4321) ("NEPA"). So, under [24 CFR 50.19\(c\)\(5\)\(ii\)](#), this NOFO is categorically excluded from environmental review under NEPA.

3. Lead-Based Paint Requirements

You must discuss the [Lead Disclosure Rule](#) if you fund education or counseling on buying or renting housing that may have been built before 1978. You must also discuss the Lead Safe Housing Rule if the education or counseling focuses on buying or renting HUD-assisted pre-1978 housing.

C. Remedies for Noncompliance

HUD may terminate all or a part of your award as described under 2 CFR 200.340 through 200.343 pursuant to the terms and conditions of your award, including, to the extent authorized by law, if an award no longer effectuates the program goals or agency priorities. HUD may also impose specific conditions on your award or take other remedies as described by 2 CFR 200.339 through 200.343, if you do not comply with your award terms and conditions.

If HUD decides to terminate an award, the applicant may submit a written appeal to housing.counseling@hud.gov within 30 days of award termination.

D. Reporting

HUD requires recipients to submit the performance, financial, and program reports as outlined below. You must comply with these reporting requirements to remain eligible for HUD funding. See [Section VII.C.](#) of this NOFO.

Further, the Recipient hereby acknowledges that HUD is in the process of implementing new grants management and reporting tools for all records pertinent to the Federal award. Recipient agrees to report on grant performance and financial activities (including vendor and cash disbursement supporting details for the Recipient and its Sub-recipients) using these new tools when they are released and to satisfy occasional requests for records pertinent to the federal award as described above. HUD will work with the Recipient to support its transition to the new reporting tools. HUD reserves the right to exercise all of its available rights and remedies for any noncompliance with these grants management and financial reporting requirements, to include, without limitation, requiring additional or more detailed financial reports, suspension of disbursements, and all other legally available remedies, to the furthest extent permitted by law.

Report	Description	When
Federal Funding Accountability and Transparency Act (FFATA)	<ul style="list-style-type: none"> Awards equal to or greater than \$30,000 Data on executive compensation and first-tier subawards See Public Law 109-282 and 2 CFR part 170 HUD reports initial prime recipient data to usaspending.gov Submit via SAM.gov 	See 2 CFR Appendix A to Part 170(a)(2)(ii)
Reporting on Recipient Integrity and Performance Matters	<ul style="list-style-type: none"> Total value of all current Federal awards exceeds \$10,000,000 for any period of time during the period of performance of this Federal award See Appendix XII to 2 CFR 200 Submit via SAM.gov 	See 2 CFR Appendix-XII to Part 200 I.(d)
Form HUD-9902	The Form HUD-9902 Housing	The deadlines are as follows:

Report	Description	When
	<p>Counseling Agency Activity Report records housing counseling and education activity by agencies participating in HUD's Housing Counseling Program. This form also captures race, ethnicity, and other reporting data. The form is an online application filed to the HUD Housing Counseling System (HCS) through an agency's Client Management System (CMS). Each HUD-approved Local Housing Counseling Agency (LHCA) must submit an electronic form HUD-9902 quarterly.</p>	<p>Quarter 1 due 1/31, Quarter 2 due 4/30, Quarter 3 due 7/31, and Quarter 4 due 12/31.</p>
<p>CHC Grant Activity Report</p>	<p>Grantees must submit Grant Activity Reports (GARs) according to the instructions and schedule detailed in the grant agreement. If the Grantee will not seek reimbursement for costs during a specific quarter, the Grantee must notify their POC in writing. The Final Report details expenses, provides a narrative report, and certification of all closeout activities.</p>	<p>The GAR is due quarterly, no later than 45 days after the end of each quarter following award package distribution.</p> <p>The Final Report is due 120 calendar days after the Period of Performance ends.</p>
<p>MSI Statement of Work and MSI Grant Activity Report</p>	<p>MSI Grantees must submit quarterly Grant Activity Reports as described in the Statement of Work (Appendix IV). Grantees must include a brief narrative describing progress and challenges achieving performance goals and objectives described in</p>	<p>The MSI GAR is due quarterly, no later than 45 days after the end of each quarter following award package distribution.</p> <p>The Final Report is due 120 calendar days after the Period of Performance ends.</p>

Report	Description	When
	the Statement of Work. In their Final Report, Grantees must describe the extent to which they (or their HBCU and/or other MSI partner(s)) were able to fulfill the program objectives of the MSI. Additional details are provided in the grant agreement.	
Training Grant Activity Reports	<p><u>Training Grant Report (TGR)</u>- A detailed report and financial accounting of HCT activity conducted under the HCT grant issued by HUD, submitted quarterly. This includes staff/consultant rates/hours, along with the number of courses offered, counselors trained and scholarships being claimed for reimbursement under this HCT grant.</p> <p><u>Monthly Training Grant Report (MTGR)</u>- A progressive monthly report of HCT activity conducted by HUD training providers during the grant performance period that summarizes the number of courses provided, counselors trained, and scholarships issued by the grantee</p>	<p>Training Grant Reports (TGR) are submitted quarterly.</p> <p>Monthly Training Grant Reports (MTGR) are submitted on the 5th of each month.</p>
Federal Financial Report, SF-425	<ul style="list-style-type: none"> • Summary of key financial data • See 2 CFR 200.328 	See 2 CFR 200.328 or award terms
Race, Ethnicity, and Other Data Reporting	Recipients that provide HUD-funded program benefits to individuals or families, report data on the race, color,	

Report	Description	When
	religion, sex, national origin, age, disability, and family characteristics of persons and households funded by this program	

E. Additional Post-Award Requirements:

1. **Client Management System.** All Applicants, Branches, and Subgrantees must use a HUD-compliant Client Management System (CMS) that interfaces with HUD's Housing Counseling System (HCS). HUD will review individual circumstances when an agency is transitioning CMSs.
2. **Counselor Certification.** To be eligible for reimbursement, all housing counseling performed under this NOFO must be provided by a HUD-certified housing counselor. See 24 C.F.R. §214.103(n).
3. **Eligible Activities.** Eligible activities are specific to each NOFO grant program.
4. **Extensions.** HUD may grant extensions as necessary, subject to statutory and regulatory constraints. The grant agreement and 2 C.F.R. 200.308(f)(10) allow HUD to modify the grant agreement's period of performance for all grantees. HUD may waive the written request requirement and may approve extensions for all NOFO grants as deemed necessary.
5. **Housing Counseling Customer Satisfaction Survey.** Grantees are required to provide the Customer Satisfaction Survey developed by the Office of Housing Counseling to their housing counseling clients. The purpose of the OHC electronic [client satisfaction survey](#) is to better understand the customer's experience and satisfaction with the services they received from the housing counseling agency and their housing counselor. This feedback will help HUD and OHC to improve the program and the quality of the housing counseling services provided. OHC will use various communications strategies to raise awareness about the availability of the survey and encourage agency adoption.
6. **Housing Counseling Work Plan.** Applicants must have an approved Housing Counseling Work Plan on file with HUD. For the CHC award, activities specified in the form HUD-9906 must be consistent with activities previously approved in the work plan prior to the application due date. Applicants are reminded of the requirement to provide counseling to at least thirty clients annually (24 CFR § 214.303(b)).
7. **Program Costs Incurred Prior to the Period of Performance.** Costs incurred outside the Period of Performance are not allowed in this NOFO.
8. **Prohibition of Rehabilitation or Construction Costs.** Building rent is eligible only under the following conditions: the rent must be for existing facilities not requiring rehabilitation or construction except for minimal alterations to make the facilities accessible for a person with disabilities; no repairs or renovations of the property may

be undertaken with funds under this NOFO; and properties in the Coastal Barrier Resources System designated under the Coastal Barrier Resources Act (16 U.S.C. 3501) cannot be leased or rented with Federal funds.

9. **Subgrantee Affiliation.** See Section II.A.2.a.ii.C, Limits on CHC Applicants.
10. **Subgrantee status.** Parents must ensure that any subgrantees added to their network for purposes of this NOFO application will be active and have their own unique HCS ID at the time of grant application.
11. **Subgrants.** Subgrants may not exceed \$500,000 (per 2 C.F.R. 200.333).

VIII. CONTACT AND SUPPORT

VIII. [Contact and Support](#)

A. [Agency Contact](#)

B. [Grants.gov](#)

C. [Sam.gov](#)

D. [Debriefing](#)

E. [Applicant Experience Survey](#)

F. [Other Online Resources](#)

VIII. CONTACT AND SUPPORT

Individuals who are deaf or hard of hearing, as well as individuals who have speech or communication disabilities may use a relay service. To learn more about how to make an accessible telephone call, visit the webpage for the [Federal Communications Commission](#).

A. Agency Contact

1. Program and Application Requirements

Name: Elizabeth Odom

Phone: Housing.Counseling@hud.gov

Email: Housing.Counseling@hud.gov

Note: HUD's assistance is limited by the standards at [24 CFR 4.26](#).

2. Paper Application Waiver Request

Name: Elizabeth Odom

Email: Housing.Counseling@hud.gov

Phone: Housing.Counseling@hud.gov

HUD Organization: Office of Housing Counseling

Street: 550 12th ST SW, 3rd Fl.

City: Washington, DC

DC DISTRICT OF COLUMBIA

20024

HUD Reform Act. HUD is prohibited from disclosing [covered selection information](#) during the selection process. The selection process includes NOFO development and publication, and concludes with the announcement of selected recipients of financial assistance. HUD will not assist you with completing your application.

B. Grants.gov

Grants.gov provides 24/7 support. You can call 800-518-4726 or email support@grants.gov. Hold on to your ticket number.

C. SAM.gov

If you need help, you can call 866-606-8220 or live chat with the [Federal Service Desk](#).

D. Debriefing

After public announcement of awards, HUD will debrief you on your application upon your written request. Submit your written request to the [agency contact for program and application requirements](#) in this NOFO. HUD may limit the information provided to protect the integrity of the competition.

Specifically, information provided during a debriefing may include the final score the applicant

received for each rating factor, final evaluator comments for each rating factor, and the final assessment indicating the basis upon which funding was approved or denied.

You may request a debriefing for a period of at least 150 calendar days, beginning 30 calendar days after the public announcement of awards under this NOFO.

E. Applicant Experience Survey

You are encouraged to provide feedback on your application experience by completing our [Applicant Experience Survey](#). Your feedback is optional; you are not required to provide personal information. HUD may use your feedback to improve future NOFOs. Your feedback has no impact on funding decisions.

F. Other Online Resources

You are encouraged to review the [online resources](#) for context on some of the NOFO requirements.

APPENDIX

Appendix

Appendix I Definitions

TABLE OF CONTENTS

APPENDIX

Appendix I. Definitions

1. Standard Definitions

For standard definitions not listed below, refer to [2 CFR 200.1](#).

Affirmatively Furthering Fair Housing (AFFH) - statutory obligation to affirmatively further the purposes and policies of the Fair Housing Act (see also [24 CFR 5.151](#), as amended by 90 FR 11020).

Authorized Organization Representative (AOR) is the official within your organization with the legal authority to: give assurances, make commitments, submit your application to HUD, enter into agreements, and execute such documents on behalf of your organization. The AOR is not necessarily the Project Director. The AOR has [defined privileges](#) within Grants.gov.

Consolidated Plan has the same meaning as defined at [24 CFR part 91](#).

E-Business Point of Contact (E-Biz POC) is [defined at Grants.gov](#).

Eligibility requirements are mandatory requirements for an application to be considered for funding.

Grants.gov is the website serving as the Federal government's central portal for searching and applying for federal financial assistance.

Historically Black Colleges and Universities (HBCUs) are any historically Black college or university included on this [list of accredited HBCUs](#).

Minority-Serving Institutions (MSIs) are

- (1) an HBCU as defined in [20 U.S.C. § 1061\(2\)](#) and included on this [list of accredited HBCUs](#);
- (2) a Hispanic-serving institution (as defined in [20 U.S.C. § 1101a\(5\)](#));
- (3) a Tribal College or University (as defined in [20 U.S.C. § 1059c\(b\)\(3\)](#));
- (4) an Alaska Native-serving institution or a Native Hawaiian-serving institution (as defined in [20 U.S.C. § 1059d\(b\)](#));
- (5) a Predominantly Black Institution (as defined in [20 U.S.C. § 1059e\(b\)\(6\)](#));
- (6) an Asian American and Native American Pacific Islander-serving institution (as defined in [20 U.S.C. § 1059g\(b\)\(2\)](#)); or
- (7) a Native American-serving nontribal institution (as defined in [20 U.S.C. § 1059f\(b\)\(2\)](#)).

Opportunity Zone (OZs) are defined in [26 U.S.C. 1400Z-1](#). In general, OZs are census tracts located in low-income communities where new investments, under certain conditions, may be eligible for preferential tax treatment.

Primary Point of Contact (PPOC) is the person HUD may contact with questions about the application submitted. The PPOC is listed in item 8F on the SF-424.

Small business is defined as a privately-owned corporation, partnership, or sole

proprietorship that has fewer employees and less annual revenue than regular-sized business. The definition of “small”—in terms of being able to apply for government support and qualify for preferential tax policy—varies by country and industry. The U.S. Small Business Administration defines a small business according to a set of standards based on specific industries. See [13 CFR part 121](#).

System for Award Management (SAM) has the same meaning as [2 CFR 25.100\(b\)](#).

Threshold Requirements are eligibility requirements you must meet before HUD advances to a merit review of your application.

Unique Entity Identifier (UEI) has the same meaning as [2 CFR 25.100\(a\)](#).

2. Program Definitions.

Affiliate. See definition at 24 C.F.R. 214.3.

Applicant. A State Housing Finance Agency, or a HUD-approved Intermediary or Multi-State Organization applying for a grant from HUD through this NOFO. The term Applicant includes the agency's Branches identified in its application.

Applicant Identifier, SF-424. This refers to the entity identifier assigned by the Federal agency. For purposes of this NOFO, this is the applicant's HCS ID. Only HUD-Approved Housing Counseling Agencies have an HCS number.

Branch. See definition at 24 C.F.R. 214.3.

Continuity of Operations Plan (COOP). An organization's internal efforts to ensure that a viable capability exists to continue essential functions across a wide range of potential emergencies. COOP plans and procedures delineate essential functions, specify succession to office and the emergency delegation of authority, provide for the safekeeping of vital records and databases, identify alternate operating facilities, and provide for interoperable communications.

Counseling. See definition at 24 C.F.R. 214.3.

Education. See definition at 24 C.F.R. 214.3.

Eligible Homeowner. In this NOFO, an eligible homeowner is a borrower with a single-family mortgage loan that is made, insured or guaranteed, or held by the Department of Housing and Urban Development, the Department of Veterans Affairs, or the Department of Agriculture.

Final Compliance Date. The date, determined by HUD, when all housing counseling required by or provided in connection with any HUD program must be performed by a HUD certified housing counselor and all group education must be overseen by a HUD certified housing counselor.

Fixed Amount Awards. See definition at 2 C.F.R. 200.1.

Full-time equivalent (FTE). 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 a quarter represents $100/411.25 = 0.24$ FTE. Two employees working in total 400 hours during that same quarterly period represent 0.97 FTE.

Grantee. A HUD-approved housing counseling agency or SHFA that receives housing counseling funds from HUD through this NOFO. The term Grantee includes the Grantee's branches identified in its application.

Homeownership Counseling. See definition at 24 C.F.R. 5.100.

Housing Counseling System (HCS). A real-time web application that manages HUD's housing counseling program data.

HCS ID. The identifier assigned by HUD Office of Housing Counseling to HUD-approved housing counseling agencies.

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.

HUD-assisted household: In this NOFO, a HUD-assisted household is a household receiving rental assistance under a HUD program including but not limited to: (1) Housing Choice Vouchers; (2) Project-Based Rental Assistance; and (3) Public Housing.

Intermediary. See definition at 24 C.F.R. 214.3.

Local Housing Counseling Agency (LHCA). A HUD approved 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.

Multi-State Organization (MSO). See definition at 24 C.F.R. 214.3.

Participating Agency. See definition at 24 C.F.R. 214.3.

Reverse Mortgage. See definition at 24 C.F.R. 214.3.

Scholarships. Housing Counseling Training assistance with travel, hotel, and/or tuition expenses for eligible housing counselors that are employed by HCAs participating in HUD's housing counseling program or persons enrolled in a HUD certified Housing Counselor Workforce Development Program sponsored by the Housing Counseling Training grantee, including military veterans and service members and/or an institution of higher education including an HBCU, Tribal College or University, or other MSI.

State Housing Finance Agency (SHFA). See definition at 24 C.F.R. 214.3.

Statement of Work. A document that describes all the tasks necessary to do the work, including all the steps needed for good management control and specificity regarding work to be done and deliverables, and provides a basis for mutual understanding of the requirements and tasks.

Subgrantee. See definition at 24 C.F.R. 214.3.

Training Partners. In addition to government agencies and/or non-profit organizations, these may also include for profit organizations with two years experience providing housing counselor training. Training Partners only providing support services, venues, or other logistical support do not have to meet the two-year experience requirement providing housing counseling training.

Training Consultant. A third-party individual who is contracted to provide training or course development, or both.

Appendix II. Electronic Submission Waiver Request Criteria Instructions and Accessing the

NOFO Application and Forms

Electronic Submission Waiver Request

See Section VI.B.2 for information pertaining to the electronic submission application waiver.

Accessing the NOFO Application and Forms

See the Section entitled “Before You Begin” of the FY 2025 NOFO, which refers you to the Grants.gov, “Quick Start Guide for Applicants”. This section contains information on how to download the application and submit materials. You must submit your application electronically via Grants.gov under the Funding Opportunity Number cited within this NOFO.

Appendix III. Application Checklist

Required forms for program applications:

One of each of these forms is required regardless of the number of awards in this NOFO for which you are applying.

See Section IV.A for the Standard Forms, Assurances, and Certifications

Items Applicable Only to Certain Applicants.

See Section IV.B for Budget Forms and Documents

See Section IV.C for Narratives and Other Attachments

Appendix IV. CHC MSI Award Partnership Chart

This chart must be completed for each MSI partnering institution

MSI Statement of Work

FY2025 Minority-Serving Institution Initiative DRAFT STATEMENT OF WORK Section I. Grant Execution		
<p>The Statement of Work (SOW) outlines specific requirements for Grantees participating in the Minority Serving Institution (MSI) Initiative. In addition to the requirements listed in the Grant Execution Checklist, MSI Grantees must submit additional documentation as detailed in the SOW below.</p>		
Activity	Task	Period due after receipt of award package
Form HUD-1044	Submit a signed and dated HUD-1044 to HUD POC.	30 days
Grantee Indirect Cost Information	Submit a copy of an approved NICRA; or provide a statement that Grantee	30 days

	elects to charge de minimis rate of 15% of modified total indirect costs or a statement that Grantee will not seek reimbursement of indirect costs.	
Subgrantee Indirect Cost Information	For each Subgrantee that claims a NICRA, submit documentation from the cognizant agency showing the approved rate.	30 days
Financial Management Systems	Submit a signed certification from the executive director or other qualified professional that the organization's financial management systems satisfy 2 C.F.R. 200.302 requirements.	30 days
Audit	Submit a copy of the most recent audit of financial activities (e.g., single or program-specific audit) completed no earlier than fiscal year 2022; or submit a copy of the most recent independent financial audit, no earlier than fiscal year 2020, for grantees that did not expend \$1,000,000 or more in Federal awards.	30 days
Names of CMS	Submit a statement certifying that the organization, and its Subgrantees and/or Branches, have a HUD-approved CMS and a list of the CMS used by Subgrantees and/or Branches.	30 days
Projections in HCS	Enter the counseling projections in HCS. Under	30 days

	the “HUD- 9902” menu item, select Projections for this grant. Enter the number of housing counseling activities anticipated under this grant for each line in Section 8 and Section 9. The screen will display the total values for each line item for the entire funding period. Click on the “Save as Draft” button.	
Statement of Work	The Grantee must complete Section VI. Program Requirements and sign the final Statement of Work	60 days
MSI Budget	The Grantee must submit a separate budget itemizing all proposed expense categories for each MSI partnership which may include salaries, fringe and other employment benefits, travel, training, marketing, outreach, and the cost of managing a network. Grantee must indicate any indirect cost rate for which they will seek reimbursement.	60 days
Memoranda of Understanding or other Agreement	Execute and maintain agreements (covering the period of performance) between all participating agencies and MSIs.	Maintain on file for HUD's review
Section II. Grant Activity Report (GAR)		
Activity	Task	Frequency
Sub-Allocations	Submit the Subgrantees and/or Branches' initial sub-allocations, current	No more than quarterly

	balances, quarterly reimbursement amounts, and cumulative drawdowns.	
Grant Reporting Requirements	Grantees must indicate the amount of funds expended and the relevant category of eligible activities carried out in accordance with the Statement of Work.	No more than quarterly
Grant Reporting Narrative	Grantees must include a brief narrative describing progress and challenges achieving objectives described in the Statement of Work for each category of eligible activities.	No more than quarterly
GAR Certification	Submit the GAR Certification - see language in the CHC Grant Agreement.	No more than quarterly
Form SF-425	Complete and submit Form SF-425 summarizing financial data for each quarter.	No more than quarterly
Form HUD- 9902	Submit HUD-9902 data quarterly and update the data to reflect counseling activity funded through this Agreement (in the "HUD Housing Counseling Grantees Only" column).	Quarterly
Payment Voucher	Submit the payment voucher (form HUD-50090-CHC-a) to ELOCCS and e-mail voucher to HUD POC. Payment for the MSI Initiative must be reported under Budget Line Item 9525 - MSI.	No more than quarterly
Section III. Final Report		

No more than 120 days after the end of Period of Performance

GAR

Grantee must describe the extent to which they (or their MSI partner(s)) were able to fulfill the program objectives described in their Statement and Work.

The narrative must address the following questions and should include the following demographic data (ethnicity, race, and income level) for numbers reported in questions 1 through 6.

1) Number of student internships completed, if applicable.

a. Number of stipends provided to student interns

b. Number of students that gained permanent employment

2) Number of students/faculty/staff/interns passing the Housing Counseling Certification Exam

3) Number of one-on-one counseling sessions

a. Number of students, faculty, staff, counseled

b. Number of community residents counseled

c. Number of student interns counseled

4) Number of group education/workshops completed

a. Number of students, faculty, staff educated

b. Number of community residents educated

c. Number of student Interns educated

5) Number of students, faculty, staff or interns educated or counseled on Fair Housing

Final Narrative

	<p>Rights.</p> <p>6) Describe how Grantee measured outcomes on the target population. Note improvements in any of the following areas (if applicable to program objectives):</p> <ul style="list-style-type: none"> a. Number of students, faculty, staff, or Interns who Secured Rental Housing b. Number of students, faculty, staff, or Interns who Purchased a Home c. Number of students, faculty, staff, or Interns with Decreased Debt or increased savings d. Number of students, faculty, staff, or Interns with Improved Credit Scores e. Number of students, faculty, staff, or Interns that Avoided Foreclosure f. Number of students, faculty, staff, or Interns who Started/Expanded Businesses <p>7) Method of Marketing Initiatives and Number Disseminated/Individuals Reached</p> <ul style="list-style-type: none"> a. Flyers/Brochures b. PSAs/Radio Advertisement c. Surveys <p>8) Describe how the institution's students and faculty were included in the proposed activities.</p> <p>9) Describe how the institution expanded its role in the target community.</p> <p>10) Describe how you would refine your program were you to receive grant funds for a 2nd year.</p> <p>11) Describe how HUD should refine this funding initiative.</p>
NICRA	Submit the NICRA containing final rates for any period for which the Grantee received

	reimbursement of indirect costs.
Closeout Certification	Submit a certification, signed by an authorized individual, which states that all closeout activities, per 2 C.F.R. 200.344 and .345, have been completed.
GAR	Submit all required documentation listed in the Grant Activity Report section of this SOW

Section IV. Grant Closeout

Closeout Agreement	HUD will send a Closeout Agreement to the Grantee after the Final Report has been approved. The Grantee should return the signed agreement to the HUD POC.	No more than 60 days after receipt of Closeout Agreement
---------------------------	--	--

Section V. Other Administrative Requirements

Federal Subaward Reporting System (FSRS)	Report the subgrant award and executive compensation information in the Federal Funding Accountability and Transparency Act's (FFATA) FSRS in cases in which either the subaward initial amount is \$30,000 or greater, or the subaward has an initial amount less than \$30,000 but will have a cumulative amount of \$30,000 or greater.	No later than one month after the award and/or subaward is obligated
Succession and Contingency Plans	Make available to HUD, upon request, plans demonstrating how the Grantee will ensure continuity of services to consumers.	Maintain on file for HUD's review
Quality Control Plan	Maintain a quality control plan in place that specifically outlines how the Grantee monitors the performance of	Maintain on file for HUD's review

	its Subgrantees.	
Changes to the Composition of Subgrantees and Branches	To amend the list of Subgrantees and/or Branches, or corresponding negotiated unit projections after negotiation and approval by HUD, submit a written request to HUD. Upon HUD's approval of such request, the sub-allocations listed in HCS must be amended.	As needed

Section VI. Program Requirements

At Grant Execution, Grantees must complete the Chart below only including Participating Agencies that have entered a formal partnership with the Minority-Serving Institution. Grantees must maintain evidence of these partnerships for review upon HUD's request.

Period of Performance: October 1, 2025 - March 31, 2027

Clients	What is the sum total of total housing counseling clients (for all MSI partnerships) the Applicant and/or its network plan to serve with this funding during the period of performance?	
Total Award	Provide the total award amount supported to fulfill the program objectives described in this Statement and Work.	

Name and HCS ID of Applicant/Subgrantee/Branch that Applicant is Funding with this Program	Name of Partner HBCU or other MSI: City, State: Contact Name: Email Address: (state "N/A" if subgrantee or branch is an HBCU or other MSI)	Allocation Amount:
---	---	---------------------------

Describe the activity undertaken for each of the relevant categories below and the number of clients that will be served.	Number of Clients Served
--	---------------------------------

The Applicant may provide a separate attachment if more space is needed.		
One-on-One Counseling		
Group Education and Workshops		
Housing Counseling Training and Certification		
Marketing and Outreach		
Oversight, Compliance and Quality Control		
Supervision of Housing Counseling Staff		

Appendix V. HCT Program Specific Requirements

Geographic Coverage. Applicants must propose to provide the housing counseling trainings nationwide. The proposed training program must be national in scope and made available to any eligible housing counselor or manager participating in the HUD Housing Counseling program.

Required activities:

1. Eligible Training Recipients. Recipients of training offered by Grantees under the award must be housing counselors employed by HCAs participating in HUD's Housing Counseling Program or persons enrolled in a HUD certified housing counselor career development program sponsored by the HCT grantee, including military veterans and service members and/or an institution of higher education including, but not limited to, an HBCU, TCU, or other MSI.

2. Open Enrollment. Training enrollment and assistance provision must be open to all. For example, enrollment, eligibility and scholarships may not be restricted to Affiliates or Branches of a particular organization.

3. Housing Counseling Training. Must be offered through a variety of models to increase ease of access, including in-person, web-based interactive and non-interactive training models. Grantees must take appropriate steps to ensure effective communications with individuals with disabilities at all courses including via live, Internet-based, and other training modes of delivery.

4. Learning Checks. Regardless of format, training must have learning checks including a final examination that confirm a counselor's participation and measure understanding of course material and learning objectives.

5. Scholarships. The proposal must include a scholarship element, including assistance with travel, hotel, and/or tuition expenses for eligible housing counselors that are employed by HCAs participating in HUD's housing counseling program or persons enrolled in a HUD certified Housing Counselor Workforce Development Program sponsored by the HCT grantee, including military veterans and service members and/or an institution of higher education including an HBCU, TCU, or other MSI.

Eligible Activities.

Applicants must propose to develop and implement a comprehensive and ongoing training program for housing counselors working for agencies participating in HUD's Housing Counseling Program. The training program must contain both basic and advanced training courses. Eligible activities may also include ongoing efforts to evaluate training quality and impact and assess the need for additional training.

An Applicant should propose to provide training on one (1) or more of the training topics listed below:

1. Overview of Housing Counseling. Training should include a review of the principles and applications of housing counseling from the client's and the counselor's point of view. Review the skills and tools needed to be an effective housing counselor. Provide overviews of the industry from a national perspective, as well as information about pre- and post-purchase counseling for homeowners, delinquency, and default counseling.

2. Basics of Homeownership Counseling (from 24 C.F.R. 5.100). Housing counseling related to homeownership and residential mortgage loans when provided in connection with HUD's Housing Counseling Program, or required by or provided in connection with HUD Programs as defined in § 5.111. Homeownership counseling is housing counseling that covers the decision to purchase a home, the selection and purchase of a home, issues arising during or affecting the period of ownership of a home (including financing, refinancing, default, and foreclosure, and other financial decisions) and the sale or other disposition of a home.

3. Pre-Purchase Counseling. Train counselors on readiness and preparation for homeownership in order to transition out of federally-subsidized housing situations; selection and mobility; budgeting and credit, insurance, loan product and feature comparison; FHA Single Family Housing Programs Lending Practices and Financial Analysis; purchase procedures and closing costs; money management (does not include debt management plan programs); selecting a real estate agent; home inspections; alternative sources of mortgage credit; down payment assistance programs; special programs available to potential

homebuyers; and referrals to community services and regulatory agencies. This training should include information on understanding Special Purpose Credit Programs and other credit programs. Use sample customer cases to identify obstacles and simulate counseling sessions. Teach counselors to give consumers more information about the cost of living by incorporating both housing and other costs, such as transportation into measures of affordability. Provide counselors with the knowledge and tools to help borrowers properly evaluate financially viable and successful homeownership, including the possible financial trade-offs that could occur in the event of negative economic events, such as job or income loss, loss of equity, etc. These may include use of outside equity, savings, or home sale to avoid unnecessary subsidy or foreclosure. Teach counselors how to read the warning signs of debt problems, as well as identify available resources to help keep homeowners out of financial trouble. Assist counselors with obtaining a thorough understanding of state and federal regulations, including the Real Estate Settlement Procedures Act of 1974 (12 U.S.C. 2601 et seq.) (RESPA) and the Truth in Lending Act (15 U.S.C.1601 et seq.) (TILA) so they are fully versed in Federal, state, and local requirements in the counseling service area.

4. Lending Practices and Financial Analysis. Train counselors on lending practices, analysis of financials, risk elements, and general concepts affecting conventional and government-insured mortgage loan decisions. Provide counselors with effective procedures and techniques to teach clients about financing options and how to choose appropriate loan products and features. Review case studies to illustrate the functional areas of the underwriting process, from the application to the loan sale.

5. Homebuyer Education Programs. Train counselors how to: deliver a comprehensive homebuyer education program; use the best materials and methods to train homebuyers with regard to increasing homebuyer financial literacy; create informed consumers when shopping for a home and mortgage loan; improve one's budget and credit profiles, with an emphasis on assisting renters entering the homebuying arena in order to transition away from federally-subsidized housing; encourage potential homebuyers to order an independent home inspection before home sale closing, and train counselors regarding any HUD required home inspection materials, if applicable; make homebuyers knowledgeable about the Lead Disclosure Rule for pre-1978 homes, EPA's Rehabilitation, Repair, and Paint Rule and the testing available for lead hazards, toxic mold, radon, and other conditions that affect the living environment and can add substantial costs to home owners having to address these issues after settlement; and maintaining one's home and finances after purchase.

6. Foreclosure and Eviction Prevention. Train counselors on the protocol for counseling homeowners or renters in financial distress. Address all aspects of delinquency and default, including reasons for default, ways to maximize income and reduce expenses, calculating delinquencies, understanding the players in the mortgage marketplace, loss-mitigation options for FHA-insured and other loans, information about foreclosure laws and timelines, tips on effectively intervening with lenders and servicers, managing multiple mortgages or liens, and the pros and cons of mortgage loan refinancing. This training should address strategies to assist renters who are facing eviction as a result of landlords facing foreclosure. This training should include information on Federal and other foreclosure prevention programs, as well as how to identify and report loan scams.

7. Resolving or Preventing Mortgage Delinquency or Default. Train counselors on the

consequences of default and foreclosure; loss mitigation, budgeting and credit; restructuring debt; importance of paying property taxes; obtaining re-certification for a mortgage subsidy; and establishing reinstatement repayment plans. It may also include foreclosure prevention strategies; national emergencies or disasters; and explaining the foreclosure process; impacted by disaster, providing referrals to other sources; and assisting clients with locating alternative housing. This training should include information and an understanding of Insurance basics.

8. Non-Delinquency Post Purchase. Train counselors on how to advise individuals and conduct workshops on home maintenance and financial management for homeowners, including, but not limited to: escrow funds; budgeting; refinancing; improving mortgage terms; home equity; home improvement; utility costs; energy efficiency improvements; property taxes; rights and responsibilities of homeowners; loan and grant options; housing codes and housing enforcement procedures; accessibility codes and how to design features to provide accessibility for persons with disabilities; lending and funding for persons who modify their dwellings to accommodate disabilities; how to specify and bid construction work; and how to enter into and manage construction contracts including actions to address the non-performance of contractors Home Improvement/home maintenance; insurance basics; lead safety for pre-1978 homes (including EPA's Rehabilitation, Repair, and Paint Rule). This training should include discussions of FHA rehab loan products, as well.

9. Rental Housing Counseling. Train counselors on how to educate individuals on the decision to rent, how to secure and maintain residence in rental housing, responsibilities of tenancy, affordability of renting, and eviction prevention. Rental topics may include HUD rental and rent subsidy programs and how to transition out of or avoid the need for these programs, including other federal, state, or local rental assistance; housing search assistance; landlord/tenant laws; lease terms; rental delinquency; budgeting for rent payments; and providing assistance with locating alternative housing; tenant/landlord responsibilities; Lead Disclosure Rule requirements and lead safety awareness; state and local laws; the eviction process; budgeting; and how to avoid the need for rental assistance programs, research, and use of policy and program information, such as market eviction research and eviction data to develop counseling strategies to help renters maintain their housing and avoid evictions. Teach counselors to give consumers more accurate information about the cost of living by incorporating both housing and other costs, such as transportation into measures of affordability. Train counselors to help renters recognize strategies that promote financial independence; and outreach to community organizations that can provide support to families to solicit their involvement, identify available housing, and link families to community services. Note that the payment of rental assistance on behalf of a client, and/or the collection of rent or loans, exclusively, have never been categorized as housing counseling. Include counseling regarding future homeownership opportunities when provided in connection with HUD's Housing Counseling Program or provided in connection with HUD Programs as defined in 24 C.F.R §5.111.

10. Reverse Mortgages. Train counselors about reverse mortgages for senior homeowners, including FHA-insured HECMs. Teach them to understand products and programs, analyze plans, compare their costs and benefits, and identify alternatives, borrower responsibilities, taxes and insurance, and financial strategies. This training should include reviews of relevant counseling skills and ethics.

11. HECM Default Counseling. Train housing counselors to work with HECM borrowers who are delinquent and/or at risk of defaulting due to unpaid property taxes, insurance, homeowner association dues, or other fees and assessments. Counselors do not need to be HECM roster counselors to perform HECM default counseling.

12. HECM Examination Preparation. Prepare counselors for the HUD HECM Counselor examination and demonstrate competency in each of the following HECM counselor certification topics: 1) how HECMs and other proprietary reverse mortgages work; 2) responsibilities of home ownership and tenancy; 3) fair housing and other civil rights laws and requirements; 4) housing affordability; and 5) avoidance of, and responses to, rental and mortgage delinquency and avoidance of eviction and mortgage default. Delivery can include individual and group tutoring sessions. Required skills such as mortgage math should be included.

13. HECM/Reverse Mortgage Continuing Education. Provide counselors continuing education courses with advanced topics on HECM/reverse mortgage counseling.

14. Counseling Individuals and Families that are Homeless or at Risk of Becoming Homeless. Train counselors about the various social services available to which they should be referring homeless and potentially homeless families and individuals. Provide information on Federal, state, and local homeless programs, including the Continuum of Care (COC) Program and how clients can access these programs. Share strategies on how to partner with local public service providers to ensure that clients receive attention and assistance quickly and efficiently. Review the unique characteristics of the homeless population to help counselors understand the types of financial literacy, physical, and social problems facing the families and individuals who seek their assistance.

15. Military Veterans Homelessness. Train counselors about the unique aspects of military veterans' homelessness. Discuss the various social services available for homeless military veterans. This training should include information on how to get a voucher from HUDVASH; how to receive SSN money and VA benefits: how to register with the VA to receive medical treatment; and how to find permanent housing.

16. Disaster Assistance Counseling- Preparedness Module: Train counselors to provide disaster assistance group education or one-on-one housing counseling. Train counselors to prepare their agencies and clients to deal with emergencies/disasters. Agency disaster response preparation includes Emergency Response Plans and COOPs. Train counselors to help their clients prepare themselves for disasters, both physically and financially. Disaster Assistance counseling for homebuyers, homeowners, or renters, should include information about home and family preparedness as well as the financial planning necessary to weather the disruptions created by a disaster. Counselors must be trained to help clients create family preparedness plans.

17. Disaster Assistance Counseling- Response/Recovery Module: Train counselors to assist clients dealing with post disaster issues and problems in the aftermath of a disaster. Includes post disaster group education or one-to-one housing counseling. Train counselors on how to guide clients following any variety of disasters/emergencies. Recovery counseling can focus on relocation, re-housing, rebuilding, helping clients navigate FEMA, insurance, local aid and grant programs, credit counseling, evictions and foreclosures. In addition to

traditional housing counseling activities, counselors will be trained in providing community support activities. Counselors need to know how to work with other organizations providing assistance and be prepared to work with highly stressed clients and staff, understanding how to provide information on their disaster support activities through social media and other tools.

18. Disaster Counseling Specialist Designation: Grantees will issue ‘Disaster Counseling Specialist’ certificates to counselors that attend and successfully complete all available modules of disaster assistance counseling offered under activities 16 & 17 above. Only grantees that offer both modules of training are eligible to issue this designation. This is designed to identify certified housing counselors qualified to provide disaster housing counseling and assist clients at all levels following any variety of local, state, or national emergencies/disasters. Preparedness counseling should focus on training counselors to prepare their agencies and clients to deal with emergencies/disasters. Agency disaster response preparation includes Emergency Response Plans and COOPs. Counselors must be trained to help their clients prepare themselves for disasters, both physically and financially, by creating family preparedness plans. Counselors should also be trained in providing Response/Recovery counseling to assist clients dealing with post-disaster housing issues and problems in the aftermath of a disaster, with a focus on relocation, re-housing, rebuilding, helping clients navigate FEMA, insurance, local aid and grant programs, credit counseling, evictions and foreclosures. In addition to traditional housing counseling activities, counselors will be trained in providing community support activities. Counselors need to understand disaster recovery programs from various agencies such as HUD (Section 8, FHA insured mortgage financing (e.g., Sections 203(h) and 203(k) programs, forbearance, foreclosure and/or eviction moratorium policies), FEMA, SBA, United States Department of Agriculture (USDA), Government-Sponsored Enterprises (GSEs), and others available local and/or state disaster assistance programs. They also need to understand homeowners and flood insurance. Counselors will be trained in providing on-site assistance, working with stressed clients, other relief organizations, volunteers and use of social media. Grantees should also consider requiring specialized courses from OHC, FEMA, SBA and other agencies in order to receive this designation.

19. Family Emergency Preparedness Plans. Training counselors to assist clients in preparing a Family Emergency Preparedness Plan. Provide resources, templates, etc. from HUD, FEMA, Red Cross and other agencies.

20. Counseling on Cost-Saving Measures. Train housing counselors about the role of cost-saving measures in boosting housing affordability and improving health, safety, comfort, and utility costs. Discuss how to use a home energy assessment to help clients make informed decisions about cost-saving measures. Review low and no cost actions and adjustments clients can make to lower utility costs, as well as home maintenance. Discuss programs available for financing cost-saving energy improvements.

21. Fair Lending and Mortgage Fraud Counseling. Train housing counselors about how to identify and counsel regarding fair lending violations and mortgage fraud, including loan documentation review. Familiarize counselors with the requirements of the Fair Housing Act, truth in lending laws, predatory lending laws, and their companion statutes and regulations as they apply to housing providers, mortgage lenders, realtors, homebuilders, public agencies,

and non-profit organizations. Train housing counselors in how to provide guidance and assistance to the client regarding identifying fair lending violations, loan scams, and mortgage fraud, filing a formal complaint and pursuing a formal investigation with the appropriate authorities under these laws, for example with the Loan Modification Scam Prevention Network: <https://www.preventloanscams.org/> and the HUD OIG Hotline Toll-free at: 800-347-3735, or 800-877-8339 (TTY), Fax: 202-708-4829; E-mail: hotline@hud.oig.gov

22. HUD Housing Counseling Program Compliance. Train counselors about the requirements of HUD's Housing Counseling Program, including the delivery of home ownership counseling and education, form HUD-9902 reporting, grant management, preparing for HUD performance reviews and resolving findings, and supervisory monitoring.

23. Housing Counseling Program Management. Train managers and future managers about opportunities to diversify funding sources; recruiting, managing, and retaining counseling staff; performing contract reviews and programmatic assessments; marketing to a variety of target audiences; complying with fair housing and other civil rights laws and requirements; maintaining focus on quality assurance and higher proficiency; increasing capacity; and efficiently managing case files utilizing a variety of time management techniques.

24. How to Start a Housing Counseling Program. HUD published the Final Rule for the Housing Counselor Certification Program on December 14, 2016. That rule implements statutory requirements that housing counseling required under or provided in connection with all HUD programs must be provided by HUD certified housing counselors employed by a HUD-approved HCA. This course is designed for agencies covered by HUD's Final Rule for Housing Counseling Certification, but not currently participating in HUD's Housing Counseling Program. Course should provide information on how to start a HUD Housing Counseling Program. Suggested topics include how to identify the needs of target population, identify counseling services, develop a work plan, create intake, disclosure, and privacy forms, identify resources, identify a client management system, collect data for services provided, and an overview on how to apply for HUD approval to participate in HUD's Housing Counseling Program. A list of Other HUD Programs covered by this final rule can be found at: <https://www.hudexchange.info/resource/5192/other-hud-programs-covered-under-huds-final-rule-for-housing-counseling-certification/>

25. Delivering Counseling Services in a Virtual Environment. May include training counselors to virtually provide housing counseling services, maintain client files and PII, collect electronic signatures, manage call centers, deliver one-to-one and group counseling remotely, working from home.

26. Marketing Your Agency. Train counselors about the tools and techniques available for successful marketing of agency housing counseling services. The Office of Housing Counseling marketing strategies and National Awareness campaign should be included.

27. HUD Certified Housing Counselor Examination Preparation. Prepare counselors to take the HUD Certified Housing Counselor examination and demonstrate competency in each of the following housing counselor certification topics: 1) financial management; 2) property maintenance; 3) responsibilities of home ownership and tenancy; 4) fair housing and other civil rights laws and requirements; 5) housing affordability; and 6) avoidance of, and

responses to, rental and mortgage delinquency and avoidance of eviction and mortgage default. Delivery can include individual and group tutoring sessions. Required skills such as mortgage math should be included.

28. Housing Counselor Workforce Development Program. Design, Develop and Administer a housing counseling program that is designed to prepare students for a career in housing counseling. This includes explaining the requirements to creating an internship program for both financially compensated and non-financially compensated interns, along with expenditures that may be eligible for reimbursement through OHC Grant funds. Individuals must be sponsored by a HUD participating housing counseling agency to qualify. This training should also include programs for HBCUs, MSIs and military veterans and service members. An applicant partnering with an MSI will also be eligible for additional funds under this activity, when the application includes a Letter of Commitment certifying that a partnership is in place and signed by an authorizing official of the MSI and documentation of the college or university's status as an HBCU, Hispanic-serving institution, Tribal-controlled post-secondary institution, Alaska Native-serving or Native-Hawaiian-serving institution, Predominantly Black Institution, Asian and Native American Pacific Islander-serving institution, or Native American-serving non-tribal institution.

29. Ethics in Counseling. This training should include the ethical responsibility of housing practitioners and HCAs. Discuss the HUD Housing Counseling standards and guidelines in detail. Deepen the conversation between the importance of conflict of interest and referring clients to other Housing professionals. Have a clear understanding of the importance of client disclosure forms. Lastly, recognize a framework of critical thinking to navigate through scenarios that may question the ethical portion of housing counseling programs.

30. Manufactured Housing Education: Manufactured homes are an affordable path to homeownership and today's manufactured homes have experienced an evolution in the types and quality of homes available to buyers. Train clients about the benefits of the manufacturing process, which allows for pre-planning to customize each home before construction begins. Customized new manufactured homes can be built and ready for occupancy on site in a matter of weeks, as compared to months for homes built on site, resulting in significant client savings. Train counselors to effectively counsel pre-purchase clients about the various options available when purchasing manufactured housing, including the basics of manufactured homes, understanding financing options, affordability, new home warranties, the walk-thru process and checklist, manufactured home maintenance and repairs, and the overall homebuying process. Train housing counselors to help clients understand the various zoning and land use regulations associated with manufactured housing. Training should include information on the benefits of long-term financing with a focus on FHA Title II loan program (which classifies manufactured homes as real property vs chattel loans that are classified as personal property), requires homes to be built on a permanent foundation, and to meet the national standard, the Manufactured Home Construction and Safety Standards (HUD Code).

31. Opportunity Zone Education. Housing counselors will be introduced to the fundamentals of Opportunity Zones (OZs) which are areas designed to attract long-term investments through federal tax incentives. Participants will gain a general understanding of how OZs function, including the role of Qualified Opportunity Funds (QOFs) and the types of

investments they support, such as real estate and infrastructure. Agencies will explore the potential benefits OZs pose to affordable housing, including opportunities for development. The session highlights how counselors can educate clients and connect them to relevant housing programs. The course may include practical resources and guidance for counselors to further explore OZ initiatives in their local areas.

Additional Requirements. Agencies selected as Grantees must comply with the following requirements:

- 1. Accessibility.** In the conduct of training and educational courses, successful Applicants must give priority to methods that provide access to individuals with disabilities, i.e., holding the live, in-person 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 or use accessible technology 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 persons with disabilities receive the benefits and services of the program or activity, e.g., training at an alternate accessible site, in-home training. Persons with disabilities must receive services in the most integrated setting appropriate to their needs. Accessibility arrangements auxiliary aids and services, and reasonable accommodations may include, but are not limited to: materials provided in different formats, including large print or Braille; interpreter services including such service accompanying web-based training; recording and archiving live, in-person training; and use of closed captioning. Arrangements for registration, testing, and evaluation must be accessible to persons with disabilities. Information on how to request available assistive services and reasonable accommodations must be available, as well as available in different formats. Regarding accessible technology, HUD requires its funding recipients to adopt the goals and objectives of Section 508 of the Rehabilitation Act of 1973 by ensuring, whenever Electronic and Information Technology (EIT) is used, procured, or developed, that persons with disabilities have access to and use of the information and data made available through the EIT on a comparable basis as is made available to and used by persons without disabilities.
- 2. Effective Communications and Meaningful Access.** Successful Applicants must ensure that all training notifications as well as communication during training sessions are provided in a manner that is effective for persons with hearing, visual, and other communications-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 C.F.R. 8.6), and as applicable, the Americans with Disabilities Act. This includes ensuring that training materials are in appropriate alternative formats as needed, e.g., Braille, audio, large type, sign language interpreters, and assistive listening devices, etc. All products and tools for capacity building must be accessible in accordance with Section 504 of the Rehabilitation Act of 1973 (See, e.g., 24 C.F.R. 8.6 on effective communications).