

FREQUENTLY ASKED QUESTIONS (FAQ)
FY2024 Fair Housing Initiatives Program (FHIP)
Notices of Funding Opportunity (NOFO) Webinar Questions and Answers

Education and Outreach Initiative (EOI)
Education and Outreach Initiative Test Coordinator Training (EOI-TCT)
Fair Housing Organizations Initiative (FHOI)
Private Enforcement Initiative (PEI)

The information below is responsive to questions received from prospective applicants prior to and following the FY2024 Fair Housing Initiatives Program (FHIP) Notice of Funding Opportunity (NOFO) Training Webinar held on October 29, 2024, as well as to questions that are or have been asked frequently by applicants. Duplicate and/or substantially similar questions submitted have been combined and answered as one question. The questions are grouped into categories: General Questions (all Initiatives); Education and Outreach Initiative; Education and Outreach Initiative – Test Coordinator Training Component; Fair Housing Organizations Initiative; and Private Enforcement Initiative.

Additional questions may be sent to AllAboutFHIP@hud.gov.

Interested parties may join the [FHIP Listserv](#) to remain informed about funding opportunities and other FHIP information.

GENERAL QUESTIONS- ALL INITIATIVES

Q: What is the Fair Housing Initiatives Program?

A: HUD manages a grant program called the Fair Housing Initiative Program (FHIP). FHIP provides significant funding through a competitive grants process for non-profit and other fair housing organizations to engage in fair housing education and outreach activities and provide enforcement related services to individuals who believe they have been victims of housing discrimination.

Q: How do I apply for a grant to receive funding?

A: Applicants must register with [grants.gov](https://www.grants.gov) and create a profile.

Interested applicants must submit applications for FHIP Notices of Funding Opportunity (NOFOs) and may search for other federal funding opportunities through [GRANTS.GOV](https://www.grants.gov). The FHIP NOFOs can also be accessed through the [Fair Housing Initiatives Program \(FHIP\) Webpage](#) and the [HUD Funding Opportunities Webpage](#).

Obtain a UEI - Applicants must provide a valid [Unique Entity Identifier update \(UEI\)](#) registered and active at [SAM.gov](https://sam.gov) in their application to permit tracking of how federal funds are awarded and expended.

Register with SAM - All applicants and grant recipients must maintain an active registration with the System For Award Management (SAM). All organizations must designate an E-Business Point of Contact (E-Biz POC) and Authorized Organization Representative (AOR) in SAM. Existing registered entities can access their UEI at [view my Unique Entity ID](#). Please visit [SAM.gov](#) for more information or to register.

Q: Are there any resources available that can assist me in applying for a grant?

A: Answers to frequently asked application-related questions can be viewed on grants.gov at [Applicant FAQs | GRANTS.GOV](#).

You may also review customer support information at [Support | Grants.gov](#) or contact Grants.gov customer support directly by phone at (800) 518-GRANTS (a toll-free number) or through email at support@grants.gov. The customer support center is open 24 hours a day, seven days per week, except Federal holidays. Telephone support is available for individuals who require speech or hearing assistance, through the Federal Relay Service's teletype service at (800) 877-8339.

In addition, HUD's Office of Fair Housing and Equal Opportunity (FHEO) maintains an email listserv for organizations interested in FHIP and through which information related to grant opportunities is disseminated. If you would like to join the email listserv, you may register here: [Listserv Signup | FHIP](#).

FHEO may host webinars to provide information about FHIP grant opportunities. Consider joining the email listserv to receive information about any upcoming webinars.

Specific questions about a FHIP Notice of Funding Opportunity may be emailed to AllAboutFHIP@hud.gov.

Q: What if I have technical questions about how to use grants.gov?

A: For technical questions about using Grants.gov, you may access the [Applicant Training site](#) and the [Grants.gov Online User Guide](#), two technical help reference items.

Q: What should I do if I have trouble submitting my application through grants.gov?

A: Grants.gov provides customer support information on its website at [Support | GRANTS.GOV](#). Applicants who have difficulty accessing the application and instructions or have technical problems can call (800) 518-GRANTS (a toll-free number) for customer support or send an email to support@grants.gov. The customer support center is open 24 hours a day, seven days per week, except Federal holidays. Customer support may also be reached by individuals who require hearing or speech assistance, through the Federal Relay Service's teletype service at (800) 877-8339.

Q: My nonprofit would like to apply for the new EOI grant but when I click on 'View Grant Opportunity' an error message appears. Please provide the correct link.

A: You may use the links below to access the FY2024 FHIP Notices of Funding Opportunity (NOFO) in Grants.gov:

[Education and Outreach Initiative, FR-6800-N-21-A](#)

[Education and Outreach Initiative Test Coordinator Training, FR-6800-N-71-A](#)

[Fair Housing Organizations Initiative, FR-6800-N-21-B](#)

[Private Enforcement Initiative, FR-6800-N-21-C](#)

The NOFOs can also be accessed by typing the Funding Opportunity Number in the search box on the Grants.gov 'Search Grants' screen, or from the HUD FHIP home page.

Q: We are new to FHIP. Will HUD help my organization develop our application?

A: HUD does not provide direct guidance or instruction in the development of an applicant's project design or in writing their applications. Interested organizations should use their best judgement to determine whether they are able to meet the requirements contained in the NOFO and develop an application that addresses these requirements.

Applications will be reviewed and evaluated by an objective Technical Evaluation Panel (TEP) using the criteria described in Section V of the NOFO. When reviewing and scoring applications, the TEP reviewers use the NOFO as their principal guidance, just as the NOFO is the principal guidance for applicants in developing their applications.

Q: I heard a reference in the training to Whistleblower Protections. What exactly does this mean? Are applicants supposed to take any specific action?

A: The Whistleblower Protections referred to in the training relate to the obligations of grantees and the protections offered to employees of grantees, contractors and subcontractors from reprisal for reporting suspected fraud, waste and abuse of federal funds, as set forth in 41 U.S.C. §4172. Specifically, the NOFOs require "Compliance with 41 U.S.C. §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." Failure to comply with these requirements may impact your ability to receive or retain a financial assistance award from HUD.

Q: Can I speak to a HUD staff person about applying for a FHIP grant?

A: Questions about applying for a FHIP grant can be directed to HUD staff at AllAboutFHIP@hud.gov or by calling Stephanie Thomas at 202-402-6938.

Q: I heard a reference to including a list of my staff's time if they work on multiple open FHIP grants. Is this list excluded from the page limits?

A: Yes, the list or chart is excluded from the page limits for Rating Factor 1. Please ensure that a staff member's time across all open grants and the proposed project does not exceed 100%.

Q: Our organization is in a state that does not have a Fair Housing Law and our statute is not substantially similar to the federal Fair Housing Act. Are we able to apply for a grant?

A: An applicant is not required to be located in or serve a jurisdiction that currently has a fair housing statute/ordinance or a statute/ordinance that is substantially equivalent to the federal Fair Housing Act to apply for a grant. Please review the specific eligibility requirements detailed in each Notice of Funding Opportunity (NOFO) for which your organization is interested in applying.

Q: Our city is interested in applying for EOI, FR-6800-N-21-A. Could you please let me know which regulations govern this program (would it be 24 CFR 100)?

A: The regulations that govern all FHIP initiatives [Education and Outreach Initiative (EOI), Private Enforcement Initiative (PEI), and Fair Housing Organization Initiative (FHOI)] can be found at 24 CFR Part 125. Additional information can also be found on the FHIP home page [Fair Housing Initiatives Program \(FHIP\) | HUD](#).

Q: Is there any plan to make FHIP multi-year funding?

A: HUD has considered multiyear funding in the past. In FY2024 the PEI NOFO makes available funding for a four-year grant comprised of four separate consecutive twelve-month periods, subject to future appropriations, and the Fair Housing Organizations Initiative (FHOI) Establishing New Organizations Component is a multiyear grant.

Q: Can you explain the affirmative marketing requirement in the NOFO?

A: Applicants must demonstrate in their application that the services or other benefits provided under the grant will be affirmatively marketed broadly throughout the local area and nearby areas to any demographic groups that would be unlikely or least likely to apply absent such efforts. Refer to Section III. F. of the NOFOs for further explanation of the requirement, which must be addressed by applicants in Rating Factor 2.

Q: I see a new requirement for a separate narrative for experience promoting racial equity, in addition to the narrative required in FY2023. Can I incorporate these narratives into my application?

A: The FY2024 NOFOs include a requirement that with each application, all applicants submit a separate one-page narrative describing how the project advances racial equity and a separate one-page narrative explaining applicant's experience promoting racial equity, in accordance with Section III.F. of the NOFO. These narratives each must be separate and distinct from the rating factor responses, though it might be that some information contained in one or both of the narratives is reiterated as part of applicant's Rating Factor responses.

Q: For the AFFH requirement, is HUD simply asking for an explanation how the proposed activities will advance AFFH? Because of the nature of our work and the deliverables, EVERY deliverable is a form of AFFH which the community and entitlement jurisdictions can benefit from.

A: HUD recognizes that FHIP organizations engage in AFFH. The NOFO template requires applicants to explain how their project advances AFFH in a specific scored section in Rating Factor 2, but applicants may include references to AFFH wherever they are relevant and relate to the proposed project. A fuller discussion of the AFFH requirement is found in the following sections of the NOFOs:

NOFO Section IV states, “Applicants may propose activities that are consistent with their jurisdiction’s Analysis of Impediments (AI), an Assessment of Fair Housing (AFH), or other means of fair housing planning that meaningfully supports their AFFH certification. If the applicant will carry out proposed activities in a jurisdiction with an AFH, the proposed activities should be consistent with the AFH’s fair housing goals and with fair housing strategies specified in the jurisdiction’s Consolidated Plan or Public Housing Agency Plan.”

Rating Factor 2 states, “applicant must describe how the proposed NOFO activities are aligned with AFFH requirements, including how its proposed activities will work towards one or more of the following: (1) address significant disparities in housing needs for protected groups, (2) address disparities in access to opportunity for protected groups, (3) address segregation and promote integration, (4) transform racially or ethnically concentrated areas of poverty into areas of opportunity, and (5) foster and maintain compliance with civil rights and fair housing.”

Q: I heard a reference to an update to the indirect cost rate. What is the rate we should use for new projects? What about for existing grants?

A: The regulations that apply to federal grants, 2 CFR Part 200, have been updated. For purposes of FY2024 NOFO applications for projects that commence on or after October 1, 2024, the indirect cost rate is 15%. If you have a current FHIP grant and have questions about the applicable indirect cost rate, send your questions directly to your GTR or grant officer. You may also send questions to AllAboutFHIP@hud.gov.

Q: Do we have to use the 15% *de minimus* or can we still use the 10% *de minimus*?

A: The regulation that applies to indirect *de minimus* cost rate is 2 CFR 200.414. Please carefully read the regulation in its entirety to determine the answer to your question, and/or consult with your organization's accounting professional.

For reference, 2 CFR 200.414(f) states:

De minimis rate. Recipients and subrecipients that do not have a current Federal negotiated indirect cost rate (including provisional rate) may elect to charge a *de minimis* rate of up to 15 percent of modified total direct costs (MTDC). The recipient or subrecipient is authorized to determine the appropriate rate up to this limit. Federal agencies and pass-through entities may not require recipients and subrecipients to use a *de minimis* rate lower than the negotiated indirect cost rate or the rate elected pursuant to this subsection unless required by Federal statute or regulation. The *de minimis* rate must not be applied to cost reimbursement contracts issued directly by the Federal Government in accordance with the FAR. Recipients and subrecipients are not required to use the *de minimis* rate. When applying the *de minimis* rate, costs must be consistently charged as either direct or indirect costs and may not be double charged or inconsistently charged as both. The *de minimis* rate does not require documentation to justify its use and may be used indefinitely. Once elected, the recipient or subrecipient must use the *de minimis* rate for all Federal awards until the recipient or subrecipient chooses to receive a negotiated rate.

Current FHIP organizations are encouraged to submit their Indirect Cost Rate proposals to Sherry Fobear, FHIP HQ Grant Officer, at sherry.r.fobear@hud.gov.

Q: If I have an intern from an HBCU would that count for extra points on the grant?

A: There are three preference point categories in the FY2024 FHIP Notices of Funding Opportunity: Promise Zones (PZ), Minority Serving Institutions (MSI) and Environmental Justice (EJ). Please note that HUD does not provide direct guidance or instruction in the development of an applicant's project design or in writing their applications, including instructing applicants how to meet the requirements for preference points. Applicants should use their best judgement to determine whether they meet the preference points requirements contained in the NOFO.

Generally, an applicant seeking MSI preference points that is partnering with an HBCU, Hispanic Serving Institution, Tribal controlled post-secondary institution, Alaskan Native-serving or Native-Hawaiian-serving institution, Predominantly Black Institution, Asian and Pacific Islander-serving institution, or Native American-serving nontribal institution will receive two (2) Preference Points when the application includes a Letter of Commitment signed by an authorizing official of the MSI certifying that a partnership is in place, and documentation of the college or university's status. For complete information about the requirements for MSI Preference Points and other Preference Points categories, please refer to Section V. A.2. in the Notice of Funding Opportunity.

Q: What does my organization need to submit to be considered for MSI Preference Points?

A: Information about Preference Points requirements is in NOFO Section V.A.2. Applicants may be considered for MSI Preference Points if they are designated as a minority-serving institution (MSI) or propose one or more partnerships with minority-serving educational institutions that have been historically underserved. An applicant designated by the U.S. Department of Education as an MSI will receive up to two (2) preference points when the application includes documentation of the applicant's status; an applicant partnering with an MSI must include with their application 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.

Q: I cannot find a Promise Zone certificate to submit with my application. Is there one on grants.gov?

A: Yes. The Promise Zone Certification form is part of the instructions zip file for the NOFO. You can find that form and other required forms as part of the NOFO package. From the NOFO page on grants.gov, click on the PACKAGE tab, then click on the 'Preview' link under 'Actions.' You will see several links for required forms on that page. When you click on the 'Download Instructions' radio button, a zip file that includes instructions, the HUD 50153 Promise Zone Certification, and other forms, will be downloaded. Once you open the zip file you will be able to access the Promise Zone Certification form.

Q: Where do I find the attachment documents I must submit with the application?

A: From the NOFO page on grants.gov, click on the 'Package' tab. Click on the 'Preview' link on that page, and you will see several forms that can be downloaded. There is also a 'Download Instructions' radio button that contains additional forms in a zip file. In addition, if you click on the Related Documents tab and then the Other Supporting Documents Folder, you will find the required budget form HUD-424-CBW and the Promise Zone preference point Form 50153. If you have trouble finding a specific form, you may send an email to AllAboutFHIP@hud.gov.

Q: Do we need to submit both lobbying forms: “Certification Regarding Lobbying” and “Disclosure of Lobbying Form SFLLL?”

A: Yes, submit both forms with your application. If your organization does not participate in lobbying activities and none of the listed activities on the form apply to your organization, you may write ‘not applicable.’

Q: When do I submit HUD-27061 for EOI grants since it involves ads, brochures, etc. which are project deliverables?

A: Applicants selected for an award (i.e. grant recipients) will have the opportunity to and must submit the form post award.

Q: Our organization has multiple addresses. How do I fill out Question 5 on the applicant disclosure report?

A: HUD does not provide direct guidance or instruction in the development of an applicant’s project design or in writing their applications. This includes instructing applicants how to complete forms and documents required to be submitted with applications for FHIP Notices of Funding Opportunity (NOFO). There are instructions on the Applicant/Recipient Disclosure/Update Report, Form HUD-2880. Specifically for Question 5 the instructions are: 5. Applicants enter the name and full address of the project or activity for which HUD assistance is sought. Recipients enter the name and full address of the HUD-assisted project or activity to which the update report relates. The most appropriate government identifying number must be used (e.g., RFP No.; IFB No.; grant announcement No.; or contract, grant, or loan No.) Include prefixes.

Q: I thought I saw a page limit in the NOFO. Are the page limits for certain sections or for the entire submission?

A: Applicant’s narrative responses for Rating Factors 1, 2 and 4 are limited to ten (10) pages for each rating factor, not including charts or lists specifically excluded from the page limits by the terms of the NOFO. There is no page limit for applicant’s response to Rating Factor 3.

Q: As our team prepares for the FY2024 FHIP NOFO process, we were wondering if we could get the scoring sheet for our FY2023 EOI application so that we can review any weak points from our application.

A: HUD cannot provide debriefings during an open competition. We may only provide prior applicants with the Summary of Common Errors document that was sent to non-funded applicants at the conclusion of the FY2023 FHIP funding opportunity application process.

Q: I want to know more about Section 3 (Fair Housing Act 1968) in relation to the NOFO?

A: FHIP NOFOs do not offer points for Section 3. For information about Section 3 you may visit [Section 3 - Economic Opportunities |HUD](#) or send an email to Section3@hud.gov.

Q: What elevates an organization in the line to receive funding?

A: The Fair Housing Initiatives Program (FHIP) has four open Notices of Funding Opportunity (NOFOs). FHIP typically publishes NOFOs under the Education and Outreach, Fair Housing Organizations and Private Enforcement Initiatives, some with multiple components. A separate NOFO under the Education and Outreach Initiative is published for the Test Coordinator Training Component.

The Rating Factors, Preference Points, and other scoring information and requirements are clearly stated in each of the NOFOs. To receive maximum points available under a particular NOFO, an application must meet all criteria contained in the NOFO. Eligible applications will be reviewed, evaluated, and scored by an objective Technical Evaluation Panel (TEP) using the criteria in the NOFO.

Please note that HUD does not provide direct guidance or instruction in the development of an applicant's project design or in writing their applications. Applicants should use their best judgement to determine whether they meet the requirements contained in the NOFO and are able to develop an application that addresses these requirements.

Q: Can we submit applications for multiple FHIP NOFOs- Different Initiatives?

A: Yes, applicants may submit more than one application, and it is possible for an applicant to apply for and receive more than one or two awards. Please note that a separate complete application is required for each initiative and/or component.

IMPORTANT: Carefully review the specific information in each NOFO for restrictions on certain multiple awards. For example, if an applicant submits applications for both PEI and FHOI-CDC and is selected for both, funding for the FHOI-CDC will be rescinded if a determination is made by HUD that the activities for both awards are the same or substantially similar.

Q: What is the due date for applications?

A: Applications for FY2024 FHIP EOI, EOI-TCT, and FHOI NOFOs must be submitted and received by 11:59 PM on **November 19, 2024**. Applications for the FY2024 FHIP PEI NOFO must be submitted and received by 11:59 PM on **November 25, 2024**. Applicants are encouraged to submit their application 48 hours before the deadline to allow time to correct any submission errors that may arise.

Q: Should I include resumes for key personnel as part of my Rating Factors response?

A: No, do not include resumes and position descriptions for staff. In most cases providing that information will exceed the 10-page per Rating Factor limit, resulting in points being deducted from the application. Any pages exceeding the 10-page narrative response limit per Rating Factor will not be reviewed.

Q: The amount of time for the Project Manager to allocate to the project was changed to 25% in the FY2024 NOFO. Can our PEI project manager still devote 50% of her time to the proposed PEI project as in past years?

A: The 25% of time the project manager must devote to the proposed project is the minimum amount of time required by the NOFOs. The project manager is not limited to a maximum amount of time he or she can devote to the proposed project. However, the project manager's time cannot exceed 100% across all grant activities.

Q: Are we required to budget for training funds in each application if we apply for more than one FHIP grant?

A: The amount required to be set aside in each application's budget for HUD sponsored or approved training is \$7,500 per annual period of performance. The \$7,500 must be included in the total amount of funding requested by the applicant. This amount must be set aside in the budget of each application submitted by an applicant, regardless of the number of applications submitted. Please see NOFO Section III.G. for complete information about training funds.

Q: If we get two FHIP awards, can we cap the training at \$7,500. Or do we have to go to \$15,000 if 2 FHIP grants are awarded?

A: The proposed budget of each separate application submitted must set aside \$7,500 annually for the applicant organization to participate in HUD sponsored mandatory or approved training. If your organization is selected for more than one FHIP grant, HUD reserves the right to examine the requested training needs. If additional training funds are not needed, HUD reserves the right to transfer funds back to fair housing activities during negotiations. If your organization is selected for more than two grants, the amount for training will be capped at \$15,000; the final amount and the allocation amongst the grants will be negotiated with the grant officer. Please see Section III.G. of the NOFO for complete information about training funds.

Q: Should an applicant's Code of Conduct be submitted with the application (as referenced on pages 26 and 27 of the NOFO document)? If yes, where should this be placed within the application materials, and does it need to be double spaced?

A: If your organization has its Code of Conduct on file with HUD and you made changes to the Code since it was last filed, please attach an updated copy to the application. The Code of Conduct should be in its original format and does not need to be double spaced but can be if it is maintained that way in the ordinary course of business.

If your organization is not listed in HUD's Code of Conduct e-library, please attach a copy of the Code of Conduct to the application and via email forward an electronic copy to HUD's Grants Management Office at askGMO@hud.gov. The email should contain:

1. Organization UEI#
2. Organization Legal Business Name (from SAM.gov)
3. Complete mailing address
4. Name, title, email and phone# for the person with executive authority.
5. Electronic codes of conduct statement (searchable documents preferred)

Q: The NOFO says that this program does not require leveraging or cost sharing or matching. Even though it is not required, can we still include letters of commitment from partners?

A: An applicant may choose to propose matching in their application submission; however, the inclusion of matching funds does not have a point value associated with it during the evaluation process. If an applicant proposes cost sharing or matching as part of their project and is awarded a grant, the applicant will be required to include the matching funds for the associated project.

Q: Have the procedures for providing certifying information regarding qualification for Environmental Justice points changed?

A: To receive Environmental Justice preference points under the FY2023 FHIP NOFO, your application must describe in detail how your proposed activities will advance environmental

justice (as defined in Section I.A.4.a. of the NOFO) for environmentally underserved or overburdened communities in at least one of the following ways, and must also clearly describe how your activities will be informed by input from affected communities:

- Reducing or mitigating exposure to environmental and health hazards (e.g., industrial facilities, EPA superfund sites, legacy pollution, heat islands);
- Improving protection from and resilience to environmental harms (e.g., fire-resistant materials, floodproofing);
- Expanding environmental benefits (e.g., clean air and water, public transportation, bike and walking paths, clean energy, green technology, biodiversity);
- Overcoming prior disinvestment in environmental infrastructure (e.g., drainage systems, green spaces, pollution controls).

Please see Section V.A.2. of the NOFO for complete details and requirements.

Q: If an organization applies for a FHIP PEI-MY and an EOI-G, do they also qualify to submit an application and obtain awards for other EOI and FHOI components?

A: It is possible for an organization to qualify for and receive more than one or two awards. Each NOFO contains its own eligibility requirements and limitations on awards; therefore, it is extremely important to carefully read each NOFO before applying.

NOTE: A separate complete application is required for each component and/or Initiative.

Q: When will HUD publish the award amounts?

A: HUD will publish a list of awardees and grant amounts either through the Federal Register and/or a press release following the completion of the Technical Evaluation Panel review and the subsequent embargo period.

Q: Is there a page limit for the Abstract? Does the Abstract need to be double spaced?

A: There is no page limit for the Project Abstract but there are character limits for each of the five (5) sections. Applicants must remain within the limits stated in Appendix C. The Abstract does not need to be double spaced.

Q: How should we cite our sources? Are we permitted to use footnotes?

A: Rating Factor 2 of the FY2024 FHIP NOFOs includes instructions to applicants to reference supporting data/evidence demonstrating identified need, and to reference any reports, statistics or other data used by providing links to and/or appropriate websites where the data is found. A presentation format that satisfies these requirements should be used. Applicants should use their best judgement in following those instructions and providing the information requested.

There is no prohibition in the NOFOs preventing applicants from utilizing footnotes in their application; please keep in mind that the format in which the materials are submitted must be within the stated page limits.

However, please do not use footnotes or other formatting in the required Abstract, which must be submitted in Word format only.

Q: I am not an existing FHIP grantee. Can I still attend the webinar and ask questions?

A: HUD invites all eligible applicants to participate in the FHIP process. New potential applicants and existing FHIP grantees are equally encouraged to attend the webinar training session, and to review the Notice of Funding Opportunity (NOFO) in which they are interested to determine if they are an eligible applicant. Questions about the NOFOs may be submitted by all interested parties to AllAboutFHIP@hud.gov.

Q: Can Key staff on who are proposed for 25% on the proposed EOI grant also be 25% on an existing PEI grant?

A: Rating Factor 1 (1) b. requires applicants to "identify all FHIP grant awards and/or subgrantee awards from FY2020 to the present, and identify each staff person assigned to the projects, including name, position and percentage of time devoted to those project(s). Staff time and effort under each Initiative/Component must represent time and effort over the entire grant period of performance. Applicants applying for other FY2024 FHIP grants, or that currently have open FHIP grants must describe how the applicant will manage, operate, and maintain activities, performance requirements and timetables for these multiple grants. This information may be provided in a list or chart that does not count towards the 10-page limit for Rating Factor 1."

The allotment of time for employees of applicant organizations/current grantees that work on multiple grants should be clearly explained and should not exceed 100% of time for a single employee across all grants.

Q: Can you explain more about administrative costs?

A: Administrative Costs are reasonable costs of overall program management, coordination, monitoring, and evaluation. Such costs include, but are not limited to, necessary expenditures for the following: (1) Salaries, wages, and related costs of the recipient's staff or other staff engaged in program administration; and (2) Providing or securing legal services, providing, or securing financial management services such as accountants, consultants, sub-contractors, or others retained by the organization.

Salaries, fringe benefits and other administrative costs charged against the project or program element for the sole purpose of administering the grant/cooperative agreements shall not exceed 10% of the annual grant award. Non-administrative costs: Salaries and fringe benefits related to the implementation of the project or program element of the cooperative agreement are not considered administrative costs. For example: the salaries and fringe benefits for technical staff to conduct work to accomplish specific Fair Housing goals as outlined in the program or project elements are not administrative costs. [NOFO Section IV.F.].

EDUCATION AND OUTREACH INITIATIVE (EOI)

Q: What is the Education and Outreach Initiative?

A: FHIP is comprised of several different initiatives, including the Education and Outreach Initiative (EOI) which promotes fair housing laws and equal opportunity awareness. The EOI offers a comprehensive range of support for eligible organizations to develop and implement education and outreach programs designed to inform members of the public and housing providers about their rights and obligations under fair housing laws. The

[Education and Outreach Initiative, FR-6800-N-21-A](#) is now open for submission of applications. HUD encourages potential applicants interested in this opportunity to read the full NOFO for more details.

Q: How long are the project periods for FHIP EOI awards?

A: The project period of performance is 12-18 months for the FHIP EOI awards.

Q: What types of proposed project activities are eligible for a FHIP EOI award? What are the special focus areas?

A: Applicants should propose appropriate project activities for the components for which they are applying. See the EOI NOFO for eligible activities and requirements for each of the five EOI components:

National Media Campaign Component - will focus on advancing racial equity and access to housing opportunities, especially in underserved communities. The campaign will include addressing barriers that may arise when people exercise their fair housing rights to expand housing choice. The campaign will also focus on educating the public about the forms of inequities based on race and national origin that can occur in real estate related transactions, including in the residential lending and appraisal markets. The campaign must provide for meaningful language access for persons of Limited English Proficiency and alternative forms of communication for individuals with disabilities. The campaign will provide information on how to file a housing discrimination complaint through HUD.

Sexual Orientation and Gender Identity Component - provides funding for fair housing organizations to create and/or update and disseminate existing materials to reflect the clarification that after the U.S. Supreme Court's Bostock decision (*Bostock v. Clayton County*, 140 S. Ct. 1731 (2020)), the FHA bars discrimination based on sexual orientation and gender identity.

Advancing Racial Equity Component - will fund local and community-based education and outreach projects to promote racial desegregation and equity and justice in housing, and to address barriers that may arise when people protected under the FHA exercise their fair housing rights to expand their housing choice, consistent with the purpose of the FHA. These barriers include but are not limited to opposition to the creation and/or location of affordable housing, neighbor harassment based on race, and obstruction of persons who are seeking to enforce their fair housing rights.

General Component - provides funding for general fair housing education and outreach activities to inform people of their rights and responsibilities under the FHA. The Department encourages proposals which target antisemitic and Islamophobic discrimination, among other forms of housing discrimination.

Targeted Fair Housing Component – provides funding to organizations that demonstrate a need in their geographic area to work directly with populations of persons with Limited English Proficiency (LEP) to ensure they are aware of and understand their rights under

the FHA. Funding may also be used for targeted education and outreach activities including fair housing services to underserved communities and underserved populations.

Q: Can you provide examples of outcomes and outputs, as defined under EOI Factor 4?

A: Rating Factor 4 includes the statement that “outcomes measure progress made towards achieving the program goals, while outputs are the measurable organization activities.” The Education and Outreach Initiative (EOI) Notice of Funding Opportunity (NOFO) states in Section V. A. 1. Rating Factor 4, 1. (d) that “An example of an output is the number of people expected to participate in education and outreach efforts or the number of people reached through such efforts.” HUD cannot provide examples other than what is stated in the NOFO.

Q: What education and outreach topics would HUD like to see in an EOI grant proposal?

A: HUD cannot propose topics other than what is stated in the NOFO.

Q: Can we submit more than one grant application for the EOI NOFO, that is apply for more than one component?

A: Yes; however, it is important to read the requirements of each NOFO carefully. For example, one organization may submit two separate applications for different components under the EOI Initiative **but** awardees of the EOI National Media Campaign and of the Targeted Fair Housing component are not eligible to receive other EOI grants. See Section III.F. of the EOI NOFO. Applicants that do submit applications for more than one component in a single initiative must ensure that the corresponding component is clearly stated on each application being submitted. Applicants must submit a separate complete application for each Initiative and Component for which the applicant applies. See EOI NOFO Section IV.B.1.

Q: Our organization has a current FHIP-EOI grant that runs until July 9, 2025. We would like to apply for a new EOI grant. The estimated project start date of the new funding opportunity is 4/30/2025. Considering this possible overlap, are we eligible for funding? We have staff capacity to manage both grants simultaneously, and we can demonstrate this in our proposal. We could also propose a later start date for the proposed project.

A: Generally, as a current grantee, your organization is not precluded from applying for other Education and Outreach Initiative (EOI) grants, or other FHIP grants, provided it meets the eligibility requirements for the specific Initiative and Component for which it applies.

There are five components in the EOI NOFO for which eligible organizations can apply. While there are restrictions on grants awarded to a single organization, (for example, the successful National Media Campaign applicant cannot receive another EOI grant but is eligible for grants from other FHIP Initiatives), there is no preclusion for current EOI grantees, who may apply for FY2023 EOI funding opportunities.

Additionally, please note that the period of performance of two grants with the same or substantially similar activities awarded to an organization may not overlap. However, the start and end dates of grants awarded through the FY2024 FHIP NOFO process may be negotiated as needed by the successful applicant and the Grant Officer or Grant Technical Representative.

Q: How do we apply for more than one component of the education and outreach NOFO in grants.gov?

A: Applicants who wish to apply for multiple components under one Notice of Funding Opportunity will have to apply more than once, submit separate complete applications, and specify on each application for which component the application is intended (for example, EOI-Sexual Orientation and Gender Identity or EOI-Targeted Fair Housing). However, though one organization may submit applications for multiple EOI components, successful applicants for the FY2024 EOI National Media Campaign component will not be awarded another FY2024 EOI grant. Similarly, successful applicants for the EOI Targeted Fair Housing Component will not be awarded another FY2024 EOI grant.

Q: How many Key Persons are required on the EOI General Component?

A: There is no specified number of key personnel required in Rating Factor 1. Applicants should use their best judgement to develop an application that addresses the requirements set forth in the NOFO. There is a requirement that "the organization has more than one current staff member with fair housing related experience on board at the time the application is submitted" and that "the applicant organization is independent and capable of implementing the proposed project without relying on other applications, or other grantee(s), including sharing of key staff." [See Page 42 of the EOI NOFO]. Please review Rating Factor 1 in its entirety and respond to each stated criterion.

Applications will be reviewed and evaluated by an objective Technical Evaluation Panel (TEP) using the criteria described in Section V of the NOFO. When reviewing and scoring applications, the TEP reviewers use the NOFO as their principal guidance, just as the NOFO is the principal guidance for applicants in developing their applications.

Q: I am trying to find out if my organization is eligible to apply for a FR-6800-N-21-A grant?

A: Eligible applicants for the Education and Outreach Initiative include: Qualified Fair Housing Enforcement Organizations (QFHOs) and Fair Housing Enforcement Organizations (FHOs), public or private not-for-profit organizations or institutions, and other public or private entities that are formulating or carrying out programs to prevent or eliminate discriminatory housing practices; agencies of State or local governments; and agencies that participate in the Fair Housing Assistance Program (FHAP). Please see NOFO Section III. for more information.

Q: Can a Public Housing Authority apply for a General Component Education and Outreach grant?

A: Yes, public housing authorities are eligible applicants for EOI general component grants.

Q: On the 4th line of Page 21 of the EOI NOFO should it refer to Affirmative Marketing being addressed in Rating Factor 2 (3) b. rather than 2 (3) a.?

A: Yes. There is a typographical error on Page 21 of the EOI NOFO that states Applicants will address the issues outlined in the paragraph above, referring to Affirmative Marketing and Outreach, in response to Rating Factor 2(3)(a). This criterion is in fact addressed in Rating Factor 2 (3) b. Proposed Activities and Affirmative Marketing, on Page 46 of the EOI NOFO.

EDUCATION AND OUTREACH INITIATIVE (EOI) - TEST COORDINATOR TRAINING COMPONENT (TCT)

Q: One place in the NOFO states a Project Period of 12 months, while in another place the Project Period is 12-18 months. Which is accurate?

A: The 12-Month Project Period is a pre-populated field in the NOFO Announcement Module Template that FHIP is unable to change. Therefore, in Section II. D. the NOFO also states “For purposes of this NOFO, 12-month project and budget period mean 12-18-month project and budget period.” This information is also shared with the TEP; applicants will not be penalized for project periods between 12 to 18 months.

NOTE: The 12-to-18-month project and budget period is also acceptable in applications for all other EOI components.

FAIR HOUSING ORGANIZATIONS INITIATIVE

Q: How many components are there in the 2024 FHOI Initiative?

A: There are two components in the FY2024 FHIP FHOI NOFO: the Continuing Development Component (CDC) and the Establishing New Organizations Component (ENOC).

Q: How do I obtain an application for the FHOI grant? Please let me know how to apply.

A: Applicants may submit applications for FHIP NOFOs and search for other federal funding opportunities through grants.gov (see links above).

Q: My organization is working on some fair housing testing and we want to do more. How do I know if the organization is eligible to apply for FHOI ?

A: There are two components under which interested eligible organizations may apply. The Continued Development Component (CDC) provides funding to eligible non-profit fair housing organizations to build their capacity and effectiveness to conduct enforcement related activities; eligible applicants for the CDC are:

- Qualified Fair Housing Enforcement Organizations (QFHOs)
- Fair Housing Enforcement Organizations (FHOs), and
- Other private nonprofit organizations seeking to build their capacity to conduct fair housing enforcement activities.

Applicants for the Establishing New Organizations Component (ENOC) must be a Qualified Fair Housing Enforcement Organizations (QFHO) (“sponsoring organization”) which will establish a new, separate organization (“sponsored organization”) to engage in fair housing work, particularly in areas of the country that are unserved or underserved by fair housing enforcement organizations. Please review the entire FHOI NOFO to determine if your organization meets the requirements contained in the NOFO and can develop an application that addresses these requirements.

Q: I work with our City Department of Civil Rights, who is responsible for investigating housing complaints, to find funding. The FHIP FR-6800-N-21-B or 21-C might be a good fit, but I want to make sure we are eligible to apply for either one as a city government.

A: City governments are not eligible applicants for FR-6800-N-21-B (FHOI) or FR-6800-N-21-C (PEI). Please see eligible applicant information below and refer to Section III. of each NOFO for more information.

Eligible applicants for the Fair Housing Organizations Initiative (FHOI) are: Qualified Fair Housing Enforcement Organizations (QFHOs), Fair Housing Enforcement Organizations (FHOs), and other private nonprofit organizations seeking to build their capacity to conduct fair housing enforcement activities.

Eligible applicants for the Private Enforcement Initiative (PEI) NOFO are: (1) Qualified Fair Housing Enforcement Organizations (QFHO) with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and enforcement related experience of meritorious claims in the three years prior to filing this application; or (2) Fair Housing Enforcement Organizations (FHO) with at least one year of experience in the enforcement-related activities listed above during the two years prior to the filing of the application. If the applicant is neither a QFHO nor a FHO with the requisite experience, the organization is ineligible for funding through this NOFO. Both FHOs and QFHOs must currently conduct all the enforcement activities listed above and operate a full-service program.

However, eligible applicants for the Education and Outreach Initiative include: Qualified Fair Housing Enforcement Organizations (QFHOs) and Fair Housing Enforcement Organizations (FHOs), public or private not-for-profit organizations or institutions, and other public or private entities that are formulating or carrying out programs to prevent or eliminate discriminatory housing practices; agencies of State or local governments; and agencies that participate in the Fair Housing Assistance Program (FHAP).

Q: Can you confirm the length of the grant period for the Establishing New Organizations Component (ENOC)?

A: Section II.D. of the FHOI NOFO states that the period of performance for the FHOI-ENOC is 36 months.

Q: Did I read correctly that only 25% of any funds granted can be used towards administrative expenses related to the grant program?

A: The Administrative costs of up to 25% of grant funding pertains to the Establishing New Organizations Component (ENOC) only. The application must outline the agreement between the sponsoring organization and the sponsored organization and the amount of administrative expenses, if any, the sponsoring organization will receive.

Section III. A. of the FHOI NOFO includes the following restriction: the sponsoring organization will receive administrative funds **not to exceed 25% of the grant funding** per year to sponsor the new organization. The sponsoring organization may only expend up to that amount for its

administrative purposes outlined in the Statement of Work. All other funds must be used for the purpose of establishing the new organization.

Generally, for FHIP grants other than the FHOI-ENOC, administrative costs are limited to 10% of grant funding per 12-month project period.

Q: Should we include administrative activities such as creating the organization when we apply for FHOI- ENOC? For example, does the entity need to be created before we apply?

A: The Statement of Work (SOW) should include the associated administrative and program tasks needed to establish the new organization. FHIP cannot advise an applicant on what activities need to be performed in the SOW outside of what is stated in the NOFO. ENOC Rating Factor 3(a) 1. b. provides that the SOW narrative should reflect enforcement related activities by year two of the grant. Therefore, year one activities may include organization creation activities.

Q: Are there specific requirements for the type of sponsoring organization that can apply for the FHOI- ENOC component?

A: The sponsoring organization applicant must be a QFHO [Section III.A. of NOFO]. In addition, see the FHOI NOFO for all specific requirements pertaining to the sponsoring and the sponsored organization.

Q: In the FHOI-CDC NOFO, is intake a requirement as a deliverable? See page 42. For instance, a project that is more systemic in nature, but includes testing and investigations, may not have many people calling us to complain given we would be investigating the market outside of typical public complaints.

A: Yes, intake is a requirement. Rating Factor 3(1)b on page 43, states, “The SOW program tasks must include **complaint intake**, complaint investigation, testing for fair housing violations and enforcement of meritorious claims...” (*emphasis added*)

PRIVATE ENFORCEMENT INITIATIVE (PEI)

Q: What is the funding cap for the PEI award?

A: The maximum individual award cap for the FY2024 NOFO is **\$425,000** per year for four years, subject to future appropriations, for new PEI awardees. This correction ensures consistency with the funding amount awarded to 2nd and 3rd year PEI grantees originally funded in FY2023 and FY2022.

Q: If our PEI application is selected, will we receive funds for all four years?

A: The PEI grant is a multiyear grant. The grant period of performance is 48 months (4 years). It is expected that the PEI grant will be funded one year at a time for four years, subject to future appropriations.

Q: Will a FHIP in its Year 2 of a 3 Year PEI Grant be considered under the 2024 NOFO?

A: No. Applicants that received FY2023 (second year) or FY2022 (third year) PEI-MY grants are ineligible to receive a new FY2024 PEI-MY award. Ineligible PEI-MY applicants may apply for and receive funding under other FHIP initiatives if all funding restrictions are met. See PEI NOFO Section III. F.6.

Q: Are FHAPs eligible for Private Enforcement Initiative funds?

A: FHAPs are not eligible for PEI funding. Eligible applicants for the PEI NOFO are: (1) Qualified Fair Housing Enforcement Organizations (QFHO) with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and enforcement related experience of meritorious claims in the three years prior to filing this application; or (2) Fair Housing Enforcement Organizations (FHO) with at least one year of experience in the enforcement-related activities listed above during the two years prior to the filing of the application. If the applicant is neither a QFHO nor a FHO with the requisite experience, the organization is ineligible for funding through this NOFO. Please see PEI NOFO Section III.A for information about eligible applicants.

Q: The estimated start date for the PEI NOFO is April 30, 2025. Can the start date be sooner?

A: After they are notified of their award, successful applicants may negotiate their start date, which may be sooner or later than the estimated start date in the NOFO. However, the project must be completed within the length of the project period stated in the NOFO.

Q: Can we include education and outreach activities in our PEI grant proposal?

A: Under the PEI NOFO, there is a limit of 15 percent of the total dollar amount awarded allowed for education and outreach related activities that support PEI. If the limit is exceeded, points will be deducted in the rating process and if awarded, funds will be adjusted to comply with the required limitation.

Q: Do applicants have to include a SOW Narrative and Chart for each year?

A: Yes, for the PEI four-year grant application, four separate SOW Narratives and four separate SOW Charts are required, one for each year of grant period of performance. In addition, four separate budgets are required, one for each year of funding.

Q: In the PEI MY component, for the charts referred to on Page 35, Rating Factor 1(2) d, should the data we provide on complaints, tests, etc., relate only to our PEI grant? Should this type of information from our FHOI grant be included?

A: Applicants must provide information that describes and demonstrates their current experience (e. g., within the past two years) in all of the fair housing enforcement activities listed on page 39, Rating Factor 1(2)d, whether accomplished with FHIP funds or not. This would include experience attained from administering all FHIP funded projects and is not limited to experience attained through PEI grants only.
