## FY 2023 Jobs Plus NOFO Questions and Answers

Note: In accordance with the HUD Reform Act, HUD cannot provide a determination to questions that ask about a specific situation (e.g., whether something would be eligible or how it would be rated) outside of reviewing a submitted grant application during its formal review process. This Q&A is meant to provide general clarification to the NOFO language.

## **Q1:** Where can I find Appendix B?

A1: Appendix B is posted on HUD's Funding Opportunity page: FY 2023 Jobs Plus NOFO | HUD.gov / U.S. Department of Housing and Urban Development (HUD). Appendix B contains a list of public housing projects (AMPs) that meet the size and unemployment criteria is provided in Appendix B of this NOFO. However, the mere appearance of a project on this list does not necessarily mean that the project is appropriate for a Jobs Plus program and may be deemed ineligible due to other criteria. PHAs with more than one project listed as eligible in Appendix B may apply to serve more than one of the eligible public housing projects (AMPs) if they are adjacent, subject to the Place and Multiple Projects criteria in Section III. A.2. See that section for full information on the "Criteria for Eligible Public Housing Projects."

Appendix B can also be downloaded from Grants.gov, as part of the FY2023 Jobs Plus NOFO package, which includes the NOFO, Appendix B and other documents needed to submit an application for FY 2023. Use this URL to find the package:

https://www.grants.gov/web/grants/view-opportunity.html?oppId=348561.

- Step 1 Click on "Package." Click on "Preview" (this is where the "Mandatory Forms" and "Optional Forms" can be found).
- Step 2 Click on "Download Instructions" button.
- Step 3 A zip file will be downloaded to your computer.
  - o Therein you will find Appendix B, along with the NOFO, the Jobs Plus Budget Form HUD 50144, and the HUD 50153.

Note: You can also find the FY2023 Jobs Plus NOFO package by going to Grants.gov and searching by "Jobs Plus" or CFDA 14.895).

Q2: Where can I find the webcast (video briefing) for the FY2023 NOFO?

**A2:** The FY2023 Jobs Plus NOFO webcast can be found on HUD's Youtube channel: <u>FY2023</u> <u>Jobs Plus NOFO instructions, June 13, 2023 - YouTube</u> (which is linked from HUD's Funding Opportunity page: <u>FY 2023 Jobs Plus NOFO | HUD.gov / U.S. Department of Housing and Urban Development (HUD)</u>. Applicants are encouraged to watch the video before responding to the NOFO.

- Q3: In the FY2023 Jobs Plus NOFO, Jobs Plus Participants are defined (on page 16) as "... a public housing resident of the target public housing project who has completed an assessment for the program." Can a resident of a Jobs Plus project who is not on the apartment lease participate in Jobs Plus and receive employment services?
- **A3:** No. The Jobs Plus program and its associated services are only for public housing residents of the targeted project. More specifically, the Jobs Plus Earned Income Disregard (JPEID), is not available to an individual who is not a public housing resident as evidenced by the public housing lease (i.e., not a public housing resident). Therefore, non-public housing residents cannot enroll in or benefit from the JPEID. A non-public housing resident may attend something that is generally available to everyone at the site (e.g., a lecture or class that is generally open and available to everyone). However, a non-public housing resident **cannot** receive any service, such as case management services, nor can they receive reimbursements or stipends in connection with the Job Plus program.
- **Q4:** In reference to Appendix B, the value listed for "Total Count of Non-Elderly Households" does not match our records for this project. Are we required to base our funding request on the number provided in Appendix B, or are we permitted to base our request on the number of non-elderly households we show in our current records?
- A4: The NOFO does not require that the number of non-elderly households in your project match Appendix B (which is based on 4/30/23 PIC data). Appendix B helps HUD confirm whether the target project is an eligible public housing project, in accordance with Section III.A.2, "Criteria for Eligible Public Housing Projects," and its Size and Unemployment criteria. Applications must meet the size and unemployment criteria of Section III.A.2 to be considered for funding. Section II.C "Minimum/Maximum Award Information" of the FY2023 Jobs Plus NOFO provides criteria for calculating an applicant's grant request.
- Q5: What is the minimum project size required to be eligible for a Jobs Plus grant?
- **A5:** The minimum project size is 100 households where at least one resident in each of the households is non-elderly (younger than age 65). HUD reduced the minimum project size from 200 to 100 households. Review Section III.A.2.a. "Size and Unemployment" of the FY2023 Jobs Plus NOFO provides the criteria for the project size.
- **Q6:** Is an applicant required to have a SAM registration to apply for this grant opportunity?
- **A6:** Yes. Section VIII. 3. Appendix A "Expired System for Award Management (SAM) Registration" of the FY2023 Jobs Plus NOFO provides the criteria for SAM registration. SAM registrations must be renewed and revalidated at least every 12 months from the date the applicant last certified and submitted their registration in SAM, and sooner if the applicant's information changes. Getting your SAM registration can take up to four weeks; therefore,

applicants should start this process or check their status immediately upon publication of this NOFO.

**Q7:** How does the FY2023 Jobs Plus NOFO address Advancing Racial Equity?

A7: The FY2023 Jobs Plus NOFO (Section III.F.14) added a requirement that applicants provide a narrative on Advancing Racial Equity, stating: "In accordance with Executive Order 13985, Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and federal fair housing and civil rights laws, you must submit a narrative demonstrating the following: You analyzed the racial composition of the persons or households who are expected to benefit from your proposed grant activities; You identified any potential barriers to persons or communities of color equitably benefiting from your proposed grant activities; You detailed the steps you will take to prevent, reduce or eliminate these barriers; and You have measures in place to track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities. Note that any actions taken in furtherance of this section must be consistent with federal nondiscrimination requirements. See Section IV [of the NOFO] for instructions on including this narrative in the application." Additionally, the FY2023 NOFO added criteria to the Capacity rating factor ("Experience Partnering with Residents") on whether applicants have past experience promoting racial equity and resources to support underserved communities.

**Q8:** How does the FY2023 Jobs Plus NOFO address Fair Housing issues such as Affirmative Marketing and Affirmatively Furthering Fair Housing (AFFH)?

A8: The FY2023 Jobs Plus NOFO (Section III.F.14) added a requirement that applicants provide a narrative on Affirmative Marketing, stating: "You must submit a narrative demonstrating that the housing, services, or other benefits provided under this 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. Such demographic groups may include, for example, Black and Brown persons or communities, individuals with limited English proficiency, individuals with disabilities, or families with children. Such activities may include outreach through community contacts or service providers or at community centers serving the target population; and marketing on websites, social media channels, television, radio, and print media serving local members of the targeted group. Documentation for this factor consists of a narrative describing the activities that will fulfill the factor requirements. See Section IV [of the NOFO] for instructions on including this narrative in the application." Additionally, the FY2023 NOFO added criteria to the Soundness of Approach ("Program Goals and Design") rating factor about affirmatively furthering fair housing (AFFH) and addressing disparities in access to opportunity for protected groups.

Also, Section I.A.4.a. "Definitions" of the FY2023 Jobs Plus NOFO provides the definition for Affirmatively Furthering Fair Housing (AFFH). Additionally, Section III.D.1. "Resolution of Civil Rights Matters" further explains that an applicant is ineligible for funding if the applicant has charges from HUD concerning violation of the Fair Housing Act. Compliance with

Affirmatively Furthering Fair Housing (AFFH) requirements, including those listed can be found on HUD's <u>Affirmatively Furthering Fair Housing</u> webpage.

Q9: For PHAs that have received multiple Jobs Plus (JP) grants, can residents who participated in the JPEID rent incentive under the 1<sup>st</sup> JP grant enroll in JPEID if they have relocated to another project/AMP that has been awarded a new JP grant?

**A9:** Yes. Residents can be in the Jobs Plus program more than once (i.e., at different sites under different Jobs Plus grants). Concerning JPEID specifically, the 48-month maximum for participation applies per grant. So if a grantee got an additional Jobs Plus grant later on, and a public housing resident who had been at the property funded by their 1<sup>st</sup> Jobs Plus grant, happened to then later be living at the public housing property funded by their 2<sup>nd</sup> grant, that is acceptable and they can again participate in the JPEID rent incentive up to the 48-month max (not to exceed the grant term) if they choose to.

Q10: Does the Jobs Plus Earned Income Disregard (JPEID) structure remain the same for the FY2023 NOFO and grants funded in connection with it, or does it change with the implementation of HOTMA?

**A10:** The JPEID structure remains the same as described in the FY2023 Jobs Plus NOFO. The final HOTMA rule (published 2/14/23) Federal Register :: Housing Opportunity Through Modernization Act of 2016: Implementation of Sections 102, 103, and 104 includes information on the Jobs Plus program and its rent incentive.

**Q11:** Do we have to serve all sites that are under the target AMP number?

**A11:** Yes, in Jobs Plus all sites under the target AMP must be served. Please note that applicants are committing to serve **all** public housing development(s)/site(s) and residents **covered by the AMP number** that the applicant indicates it is targeting in the Jobs Plus application. The project(s) must meet all criteria of the NOFO such as those described in Section III.A 2. Criteria for Eligible Public Housing Projects." Also reference Section I.A. 4.b. Program Definitions. "Target Public Housing Project" is defined as "the public housing project that the PHA selects to benefit from the Jobs Plus grant. Throughout the NOFO it may also be referred to as the "public housing project" or the "project". For purposes of this NOFO, "project" means "AMP" (Asset Management Project; PIH Notice 2007-28) and each project is identified by an AMP number as captured in PIH Information Center (PIC). AMP numbers are the identifier HUD uses to check eligibility using data from PIC as described in this NOFO. An AMP number may cover just one public housing development/site, or it may cover multiple public housing development(s)/site(s).

Additionally, see Section III.A.2. "Criteria for Eligible Public Housing Projects". Applications must target an eligible Section 9 public housing project(s) (AMP's) as described in Section III.A.2 of the NOFO. Because AMP-level data (from PIC) is used to determine eligibility, Jobs Plus applications must target entire public housing projects (AMPs), not partial public housing projects (AMPs). Please note that applicants are committing to serve all public housing development(s)/site(s) and public housing residents covered by the AMP number that the applicant indicates it is targeting in the Jobs Plus application.

Q12: Does the Jobs Plus grant require you to serve 100% of the residents at the targeted sites?

A12: No, you are not required to serve 100% of the residents at the targeted site. However, any public housing resident of the target public housing project is eligible for Jobs Plus. And, as stated in Section III.F.6. Outreach and Engagement, "Grantees are expected to implement robust outreach and engagement plans in order to meaningfully involve residents in the Jobs Plus program throughout the grant. Specifically, grantees are expected to contact 100% of workforce adults in the project, within the first year, to inform them about the Jobs Plus program and encourage them to be assessed for services and supports." While grantees should strive to maximize resident participation (saturation is essential to the Jobs Plus model), residents cannot be required to participate in the Jobs Plus program (see Section III.F.7 for requirements on Resident Choice).

Q13: Can I create my own rent incentive for this program?

**A13:** No. As stated in the NOFO (page 5), successful applicants must "implement a financial/rent incentive for residents of the project, known as the Jobs Plus Earned Income Disregard (JPEID). This component will neutralize any rent increase due to rising earned income for Jobs Plus participants, removing a major disincentive to employment. The rent incentive offered through JPEID will be reimbursed to the PHA via the awarded Jobs Plus grant and should be included in the program budget. Any other compensation to the PHA for lost rent revenues, such as by the standard Earned Income Disregard (EID) calculation in the Operating Fund, will be offset manually to prevent overpayment of HUD funds to grant recipients. Further guidance will be available at the time of the award."

Q14: What are the eligible uses of grant funding that can be used to encourage participation in the Jobs Plus Grant?

**A14:** Besides employment, training and educational supports, grantees will have the flexibility to provide other supportive services based on resident needs and local capacity, within the context of Jobs Plus. HUD expects that all services that are available to residents of the community will be provided in-kind from partners. Grant funds should only procure services that are not already available (by either service type or amount).

All program expenses must be approved by HUD and be within statutory and regulatory limitations (e.g., 2 CFR Part 200). HUD reserves the right to approve or disapprove any activity and may adjust grant budget amounts accordingly within individual grants and across this grant program. See Section III.F.13, Eligible Activities and Costs for additional details.

Q15: Does the Jobs Coordinator position have to be full-time role?

A15: Yes. There should be one person (Jobs Plus coordinator/director) who has primary responsibility for the day-to-day management of the Jobs Plus grant and spends all of their time doing so. See Section III.F.8. "Jobs Plus Team"

Q16: Who should be my primary employment partner for implementing the Jobs Plus grant?

**A16**: Successful applicants must partner with the local Workforce Development Boards (WDB) and American Job Center(s) (AJC, formerly known as One-Stop Center) in their area to offer multiple employment-related services for residents with a range of employment needs. See Section I.A.1.A. "Employment-Related Services" of the Jobs Plus FY23 NOFO for specific details.

Q17: What is the total grant term for the Jobs Plus grant?

**A17:** The grant period of performance is 54-months, which includes 6-month start-up period and a 48- month implementation period. See Section II.D. "Period of Performance" of the Jobs Plus FY23 NOFO that specifically addresses this question.

**Q18:** How do I submit an eligibility determination for developments not on Appendix B?

A18: Before submitting a grant application, applicants whose public housing projects (AMPs) are not included in Appendix B but who believe a combination of public housing projects (AMPs) will meet eligibility requirements, must first submit a Request for Review of Eligibility of their target public housing projects (AMPs) to determine eligibility. The Request must be sent via email to <a href="JobsPlus@hud.gov">JobsPlus@hud.gov</a> and must contain the project name(s) and project (AMP) numbers(s) (in the format found in Appendix B; see example column headers below) that are proposed to be combined to meet the size and unemployment criteria for eligible public housing projects (AMPs). See Section III.A.2.a. Size and Unemployment, Appendix B. "If not in Appendix B. Process for Request for Review of Eligibility" of the Jobs Plus FY23 NOFO that specifically addresses this question.

Q19: How do I establish the numerical goals identified in Section I.A (pages 9-10 of the NOFO)?

**A19:** Most of the goals in Section I.A are based on the number of workforce adults in the project (AMP). For example, "Number of individual enrolled in the Jobs Plus Earned Income

Disregard," 80% of workforce adults in the project is the minimum goal. Applicants should be careful to formulate their goals based on the total number of workforce adults (formerly called "work-able adults" in prior NOFOs) in the AMP. Please note, the NOFO defines workforce adults as "generally an individual between the ages of 18 - 64 who is interested and able to become employed. Resident participation is determined by the individual voluntarily choosing to participate in the program. The term 'workforce force adult' does not preclude individuals with disabilities from participating in this program. Review the "Numeric Goals" table under Section I.A.2., "Applicable Goals and Objectives from HUD's Strategic Plan" for additional details.

## **Q20:** What is the definition for work-force adults?

**A20:** "Workforce Adults" is defined as follows - For the purposes of measuring outcomes of this grant program, a workforce adult is generally an individual between the ages of 18 - 64 who is interested and able to become employed. Resident participation is determined by the individual voluntarily choosing to participate in the program. The term "workforce adult" does not preclude individuals with disabilities from participating in this program. PHAs are not permitted to exclude any residents from this program based on any disability. Reference: Section VI, part B: Administrative, National and Departmental Policy Requirements and Terms for HUD Applicants and Recipients of Financial Assistance Awards; Compliance with the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act. See Section I.A.4.b. Program Definitions, "Workforce Adults."

Q21: Should all residencies within the 2 AMPS be within the 1-mile radius of the Jobs Plus Center or is it acceptable as long as part of the AMP is touching? For instance, if combining AMPs X and Y, with the Jobs Plus Center located in the middle of X and the 1-mile radius touching the easternmost part of Y, would it be possible to combine X and Y in entirety or just X and the specific units within Y that are within 1 mile?

A21: The NOFO does not require that the entire AMP is within one-mile of the Jobs Plus Center. It is acceptable for part of the AMP to be within a 1-mile radius of the Jobs Plus Center. You should double check that the locations are within the one-mile radius, otherwise this could cause your application to be deficient. Jobs Plus is a place-based program, where saturation of the Jobs Plus model is essential. The projects (i.e., AMPs) to be served should be singular (one development/site); multiple developments/sites that are adjacent; and/or multiple developments/sites that are each generally within one mile of the Jobs Plus Center. See Section III. 2. "Criteria for Eligible Public Housing Projects."

Q22: Can you please clarify the definition of "Unemployment" for this NOFO, other than the following: "...households (excluding households consisting only of elderly residents) that report no earned income in PIC."

**A22:** Unemployment is based on the unemployment data reported in the HUD PIC data system. See Section III. A.2.a. Size and Unemployment for additional details.

Q23: Can a PHA apply for Jobs Plus at a site that is already receiving grants for FSS or ROSS?

**A23:** Yes. An applicant can apply for the FY2023 Jobs Plus grant for a public housing property (Project/AMP) that is currently receiving grant funds for Resident Opportunities and Self-Sufficiency (ROSS) or Family Self-Sufficiency (FSS). A full-time Jobs Plus staff person is not permitted to also serve the functions of a Resident Opportunities and Self-Sufficiency (ROSS) or Family Self-Sufficiency (FSS) coordinator. Jobs Plus grant funds may not be used to pay the salary of a ROSS or FSS coordinator for any ROSS or FSS programs. As indicated in the NOFO, HUD will fund no portion of an application that duplicates other funded programs or activities from prior year awards or other selected applicants. See 2 CFR part 200.405 for additional information on Allocable Cost requirements. Review Section III.F.8, Program-Specific Requirements - Jobs Plus Team for additional details.

**Q24:** Can you apply for Jobs Plus grant funds if the PHA has received a Commitment to enter into a Housing Assistance Payments Contract (CHAP)?

**A24:** Yes. Per Section III.A.1.c, Criteria for Eligible Applicants - Relation to Rental Assistance Demonstration (RAD) Applicants: "PHAs that have applied for RAD, received a Commitment to enter into a Housing Assistance Payments Contract (CHAP) (either a Portfolio award that covers the project or a Multiphase award) that covers the target public housing project and are planning on demolition and new construction or major rehabilitation or reconstruction, may apply for a Jobs Plus Grant provided they have not yet received a RAD Conversion Commitment (RCC) at the time of the application deadline for this NOFO." Note: Section III.A.1.c also states that "If the PHA has received its RCC as of the time of the application deadline, it *cannot* apply for funding under this NOFO." The RAD program requirements are detailed in Section III.A.1 (Criteria for Eligible Applicants - Relation to Rental Assistance Demonstration (RAD) Applicants) and Section III.F., "Rental Assistance Demonstration."

From Section III.A.1, Criteria for Eligible Applicants: "c. Relation to Rental Assistance Demonstration (RAD) Applicants. PHAs that have applied for RAD, received a Commitment to enter into a Housing Assistance Payments Contract (CHAP) (either a Portfolio award that covers the project or a Multiphase award) that covers the target public housing project and are planning on demolition and new construction or major rehabilitation or reconstruction, may apply for a Jobs Plus Grant provided they have not yet received a RAD Conversion Commitment (RCC) at the time of the application deadline for this NOFO. If the PHA has received its RCC as of the time of the

application deadline, it cannot apply for funding under this NOFO. In the case where there is a Multiphase award, only units at the target public housing project that are not included in an RCC at the time of the application deadline are eligible. If an RCC including the target public housing project is received after the NOFO application deadline and the project converts to PBV or PBRA through RAD prior to the start of the Jobs Plus grant term, then the target public housing project is no longer eligible to receive Jobs Plus funding under this NOFO. Applicants should review the program requirements on RAD (see section III.F., "Rental Assistance Demonstration" for additional information on RAD and Jobs Plus). Applications should discuss this threshold in their application (e.g., in the Executive Summary)."

Q25: Can a Jobs Plus (JP) grantee that has received a RAD Conversion Commitment (RCC) after the grant term begins continue to implement the program and utilize JP grant funds?

**A25:** Yes, but under certain limitations. Applicants considering RAD should carefully review the following criteria of the NOFO. For additional details, Section III.F.5, "Rental Assistance Demonstration" (page 29) and VI.B "Rental Assistance Demonstration (RAD)" (page 72). There are certain conditions where the HUD may determine to modify or terminate the Jobs Plus grant.