

FY16 Jobs Plus NOFA FAQ

May 4, 2015

Q1. How was the list for eligibility created?

A1. Appendix B was created based on a point in time pull from the IMS/PIC data as of 3/29/2016. We used the below criteria to generate the list for Appendix B. The list of developments only identifies developments that meet two of the selection criteria listed in the NOFA, namely:

- (1) a development must have at least 200 households (excluding elderly-only households); and
- (2) at least 50 percent of the households in the development (excluding elderly only households) do not have a member showing earned income based on HUD's Inventory Management System/ PIH Information Center (IMS/PIC) data.

Please review additional selection criteria described in the NOFA.

Q2. If our Agency is not listed on 2016 Appendix B, are we not eligible to submit an application?

A2. PHAs that have developments not listed on Appendix B that the PHA believes, when combined, meets the criteria, may submit a request for review of eligibility. PHAs may propose to combine two or more developments (e.g., two small developments) to meet the criteria for eligible developments, subject to the following conditions:

- Parts of developments cannot be combined. Only entire developments may be combined.
- The combined developments must meet the criteria for size.
- The combined developments must meet the criteria for unemployment.

Process for Request for Review of Eligibility. In advance of submitting this grant application, applicants whose developments are not on Appendix B but who believe a combination of developments will meet eligibility requirements, must submit a Request for Review of Eligibility of their target developments. To be considered, applicants must submit a Request via email to JobsPlus@hud.gov that lists the development name and numbers (in the format found in Appendix B) that are proposed to be combined to meet the criteria for the Jobs Plus program. HUD will review the request using the same query of PIC data on the proposed combined developments to determine if the proposed developments meet the criteria for size and unemployment (see above) that were used to generate Appendix B. HUD will respond within five working days of receipt of the request. That response will be an eligibility approval, eligibility disapproval, or a request for more information. If more information is requested, HUD will respond within five working days upon receipt of the additional information. All initial Requests for Review of Eligibility must be received no later than 20 calendar days prior to the due date of this NOFA.

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

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

Q4. We already have a rent incentive program through our rent reform demo or MTW authority. Do we have to use JPEID?

A4. JPEID must be offered to all participants. Other incentives may be used, but may not be paid out of Jobs Plus funds.

Q5. Funding for JPEID will come from Jobs Plus appropriations – this will be a 4 year budgeted item to cover the rental loss from participants in the program?

A5. Yes, just as PHAs are “made whole” for the rental loss from regular EID, the JPEID will come from the grant and the future Operating Fund request will be modified to reflect that the PHA already received funds from the Jobs Plus grant to cover the rent incentive.

Q6. Is it HUD’s expectation that all service providers being paid with grant funds be procured in accordance with 24 CFR 85? Does this include the WIB/AJC/One-Stop with whom we will have an MOU?

A6. Yes, 24 CFR 85 (as amended by 2 CFR 200 starting December 26, 2014) applies the same to the Jobs Plus grant as to any other HUD funds granted to a PHA. The MOU requirement does not suggest either a contractor or subgrantee relationship. Any grant funding provided by the PHA to a WIB or AJC would be a procurement transaction, and would have to meet 24 CFR 85. Once the procurement regulations are satisfied by the PHA, then the WIB or AJC would not be subject to these procurement regulations for any procurement that they perform unless HUD would determine that the PHA exercises significant decision making functions for the WIB or AJC (in an effort by the PHA to avoid compliance with Part 85/200).

Q7. The NOFA says that I can target a sub-population. Do I have to serve everyone in the development?

A7. You must offer services to everyone (all ACC units) in the development(s) for which you are funded. The main target is Work-Able (aged 18-61 who are physically and mentally able to become employed) but services should not be withheld from seniors or people with disabilities who would like to participate. The program may be tailored toward a sub-group (women, young adults, etc.) but participation must be offered to all in the development(s).

Q8. If I have a mixed development (i.e. Public Housing, Project Based and Tax Credits) is everyone in the Development eligible for Jobs Plus?

A8. No, only residents residing in ACC units can be enrolled in the program. If there are services incidental to the program on-site (e.g. a job fair) other residents could participate, but due to the authorizing language, only residents in conventional public housing (ACC units) may be enrolled, have grant funds pay for their services and benefit from the JPEID.

Q9. One of our eligible developments is slated for RAD conversion soon. Can we still apply for Jobs Plus to serve that development?

A9. If a PHA is a successful applicant for Jobs Plus funds, the PHA will be required to implement the full 48 month term of the grant at the public housing site(s) for which funds were awarded and commit to not engaging in any significant redevelopment that would result in resident relocation during the 48-month Jobs Plus implementation timeframe. Notwithstanding the above, conversion of public housing assistance to a project-based section 8 contract under the Rental Assistance Demonstration (RAD) will not itself cause the termination of Jobs Plus funds. Grantees that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at the subject site as long as the conversion does not entail significant relocation or result in a substantial change in building occupancy.

Q10. We have an FSS program, do we have to use JPEID? Can JPEID be used to fund escrow?

A10. JPEID must be offered to all participants. Other incentives may be used, but may not be paid out of Jobs Plus funds. Note that the use of JPEID would function similarly to EID or flat rent with an FSS family – if the rent does not increase, the family does not escrow. A family who is already enrolled in FSS would not have to accept JPEID if they chose to continue with escrow instead.

Q11. Does the NOFA language in section III.C.2.b.(9) re: *Consistency with the Consolidated Plan and Analysis of Impediments (AI)/Assessment of Fair Housing* mean we are not required to submit a separate form for Consistency with the Consolidated Plan?

A11. The Jobs Plus NOFA does not explicitly direct applicants to provide separate certification of consistency with a HUD-approved consolidated plan.