

**FORMS REVISION CHART, OMB 2502-0621 HUD Form No. 9906-P
 “Housing Counseling Notice of Funding Opportunity (NOFO)”**

BURDEN ON THE PUBLIC No change/ Increase/ Decrease	LOCATION	CURRENT TEXT	REVISED TEXT	EXPLANATION FOR CHANGE
<p>No Change; explanatory; offers additional information on how to comment on the burden calculation.</p>	<p>HUD 9906-L, Page 1</p>	<p>Public reporting burden for this collection of information is estimated to average 43 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.</p> <p>The information will be used by HUD to ensure that Counselors provide guidance and advice to help families and individuals improve their housing conditions and meet the responsibilities of tenancy and homeownership. Counselors also help borrowers avoid predatory lending practices, such as inflated appraisals, unreasonably high interest rates, unaffordable repayment terms, and other conditions that can result in a loss of equity, increased debt, default, and foreclosure. This agency may not collect this information, and you are not required to complete this form, unless it displays a valid OMB control number.</p>	<p>Public reporting burden for this collection of information is estimated to average 43 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.</p> <p>Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to U.S Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 4176, Washington, DC 20410-5000 or email: PaperworkReductionActOffice@hud.gov. When providing comments, please refer to OMB Approval 2502-0621. Do not send completed forms to this address. The information is being collected for a housing counseling agency to participate in HUD’s Housing Counseling program and is required to obtain or retain benefits. No confidentiality is assured.</p> <p>The information will be used by HUD to ensure that Counselors provide guidance and advice to help families and individuals improve their housing conditions and meet the responsibilities of tenancy and homeownership. Counselors also help borrowers avoid predatory lending practices, such as inflated appraisals, unreasonably high interest rates, unaffordable repayment terms, and other conditions that can result in a loss of equity, increased debt, default, and foreclosure. This agency may not collect this information, and you are not required to complete this form, unless it displays a valid OMB</p>	<p>Regulatory required language explaining how to comment on collection added.</p>

			control number.	
No change-explanatory	HUD 9906-P, Page 2, Chart A1, F	F Number of Housing Counselor Full-Time Equivalent	F Number of HUD Certified Housing Counselor Full-Time Equivalent	Complies with current policy and practice
Burden collection reduction	HUD 9906-L, Page 2, Chart A1, H)	H Number of Default Counselor Full-Time Equivalent Providing Reverse Mortgage/HECM Default Counseling during Grant Period [text box]		Revision to collection: number of Reverse Mortgage counselors for grant term is no longer being used as part of funding methodology.
Burden collection reduction	HUD 9906-L, Page 2, Chart A1, J)	J HUD-Certified Housing Counselors on Staff [text box]		Revision to collection because HUD can use its own data from another collection.
Burden collection reduction	HUD 9906-L, Page 2, Chart A1, K)	K Adopted National Industry Standards [text box]	I Adopted National Industry Standards -Not Applicable	Change in punctuation letter required because of deletion above. National Industry standards are temporarily Not Applicable pending their revision
No change	HUD 9906-L, Page 2 Chart A1 L),	L Issued Client Exit Surveys[text box]	J Issued Client Exit or Follow-up Client Surveys ... [text box]	Change in punctuation letter required because of deletions above Consolidation of (L) and (M) to avoid redundancy
No change	HUD 9906-L, Page 2, Chart A1, M)	M Issued Follow-Up Client Surveys. [text box]		Consolidation of (L) and (M) to avoid redundancy Change in punctuation letter required because of deletions above
Significant burden	HUD 9906-L,	CHART B1 – LEVERAGING		Revision to collection

collection reduction	Page 3, Chart B1	Applicants with leveraged funds must fill out and attach their Chart B (Excel) to their grants.gov application. Failure to complete and submit this form may result in loss of points.		because HUD can use its own data from another collection.
No Change in burden. Explanatory language and examples added.	HUD 9906-L, Page 4, Chart C1, (A)	<u>Affirmatively Furthering Fair Housing.</u> You must provide a brief description of how you will carry out your proposed activities in a manner that affirmatively furthers fair housing in compliance with the Fair Housing Act and its implementing regulations. For example, you could describe how you will address disparities in access to opportunity for protected classes by fostering and maintaining compliance with civil rights and fair housing laws by providing persons with counseling, education, or information on housing discrimination and the rights and remedies available (limit 2,000 characters). Note: any actions taken in furtherance of this section must be consistent with federal nondiscrimination requirements. Failure to submit this narrative is a non-curable deficiency which may result in applicants being deemed ineligible.	<u>Affirmatively Furthering Fair Housing.</u> You must provide a brief description of how you will carry out your proposed activities in a manner that affirmatively furthers fair housing in compliance with the Fair Housing Act and its implementing regulations. Specifically, you should describe how your proposed NOFO activities will work towards one or more of the following: 1) addressing disparities in access to opportunity for protected class groups; and/or 2) fostering and maintaining compliance with civil rights and fair housing. For example, you could describe how you will address disparities in access to opportunity for protected class groups by describing how you: maintain a database of accessible housing opportunities in the community for use by persons with disabilities, provide mobility counseling to help persons move and access affordable housing in the community, or provide in-language counseling to persons who are Limited English Proficient (LEP) to assist them with lending, establishing credit, or accessing relevant financial services You could also describe how you fostering and maintaining compliance with civil rights and fair housing laws by providing persons with counseling, education, or information on housing discrimination and the rights and remedies available (limit 2,000 characters). Note: Failure to submit this narrative is a non-curable deficiency which may result in applicants being deemed ineligible.	The additional language does not change the type of information collected; instead, based on responses and feedback received during the last NOFO we added additional clarifying information to assist the respondents in preparing their response. There is no revision to the collection of information or the requirement that this question be answered, and that the information be provided.
No change in burden. Applicants get a second chance to answer if they fail to answer or fail to answer appropriately	HUD 9906-L, Page 5, Chart C1, (C)	<u>Advancing Racial Equity.</u> 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:	<u>Advancing Racial Equity.</u> You must submit a narrative demonstrating the following:	As per FHEO's request, this question is a curable deficiency. Therefore, if the initial response does not address all of the required elements, the

		<p>-You analyzed the racial composition of the persons or households who are expected to benefit from your proposed grant activities;</p> <p>-You identified any potential barriers to persons or communities of color equitably benefiting from your proposed grant activities;</p> <p>-You detailed the steps you will take to prevent, reduce, or eliminate these barriers; and</p> <p>-You have measures in place to track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities. (limit 1,000 characters).</p> <p>Note: any actions taken in furtherance of this section must be consistent with federal nondiscrimination requirements. Failure to submit this narrative is a non-curable deficiency. which may result in applicants being deemed ineligible.</p>	<p>-You analyzed the racial composition of the persons or households who are expected to benefit from your proposed grant activities;</p> <p>-You identified any potential barriers to persons or communities of color equitably benefiting from your proposed grant activities;</p> <p>-You detailed the steps you will take to prevent, reduce, or eliminate these barriers; and</p> <p>-You have measures in place to track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities. (limit 1,000 characters).</p> <p><u>Note:</u> This narrative is required and must address the four bullets outlined in the paragraph above. This narrative will be evaluated for sufficiency and will not change the applicant’s score or rank as compared to other applicants. If the narrative is deemed insufficient, it will be a “Curable Deficiency” that will be communicated to the applicant for correction with a notice of deficiency</p>	<p>applicant will be notified and able to submit an additional response which will not be rated.</p> <p>Additionally, helpful explanatory information is provided.</p> <p>There is no revision to the information request or on the requirement that this question be answered and information be provided.</p>
No change in burden. One explanatory word added	HUD 9906-L, Page 5, Chart C1, (F)	<u>Limited English Proficiency.</u> Describe what steps will be taken to ensure people with limited English proficiency (LEP) will have meaningful access to programs and activities (limit 1,000 characters).	<u>Limited English Proficiency.</u> Describe what steps will be taken to ensure people with limited English proficiency (LEP) will have meaningful language access to programs and activities (limit 1,000 characters).	Added word “language” to the type of access as necessary clarification.
Slight possible change in burden. If an applicant thinks it will have a low score, they may provide an optional explanation for 1 point.	HUD 9906-L, Page 5, Chart E1	CHART E1 – USE OF FUNDS	CHART D1 – USE OF FUNDS Adjustment Point (Optional). Applicants may provide a narrative description in the field below (limit 1,000 characters) that adequately explains expenses that would result in an inordinately high cost per client.	Change in punctuation letter required because of deletion above. Opportunity for respondent to provide an optional explanation added.