



U.S. Department of Housing
and Urban Development

Fair Housing Initiatives Program - Fair Housing Organizations Initiative FY2025 and FY2026

OFH-2600-DC-021B

Fair Housing and Equal Opportunity

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BEFORE YOU BEGIN

If you are a good candidate for this funding opportunity, register in the required systems and review the application materials. If you are already registered, confirm that your information is current and active.

SAM.gov Registration

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

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

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

Grants.gov Registration

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

See [Section VI.B](#). Submission Methods.

Find the Application Package

Use the Grants Search at [Grants.gov](https://grants.gov) and search for opportunity number OFH-2600-DC-021B . The application package has all the online forms you need to apply. You also need to access the Download Instructions link and review the content before you apply.

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

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

Application Deadline

HUD Listserv

To get **email alerts** about current and future funding opportunities, **subscribe** to [HUD's Funding Opportunities listserv](#).

I. BASIC INFORMATION

I. Basic Information

A. Summary

B. Agency Contact(s)

I. BASIC INFORMATION

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

A. Summary

Federal Agency Name:
United States Department of Housing and Urban Development (HUD)

HUD Program Office:
Fair Housing and Equal Opportunity

Announcement Type:
Initial

Program Type:
Discretionary

Paperwork Reduction Act Information:
2501-0044, 2529-0033

Due Date for Intergovernmental Review:
See [Section VI.C.1.](#)

Key Facts

Opportunity Name:
Fair Housing Initiatives Program - Fair Housing Organizations Initiative FY2025 and FY2026

Opportunity Number:
OFH-2600-DC-021B

Federal Assistance Listing(s):
14.417

Key Dates

Application Due Date:
11:59:59 PM Eastern Time on:
08/06/2026

Anticipated Award Date:
09/30/2026

Estimated Performance Period Start Date:
02/01/2027

Estimated Performance Period End Date:
01/31/2029

1. NOFO Summary

The FHIP Fair Housing Organizations Initiative (FHOI) provides competitive awards to qualified fair housing enforcement organizations, other private nonprofit fair housing enforcement organizations, and nonprofit groups organizing to build their capacity to provide fair housing enforcement, for the purpose of supporting the continued development or

implementation of initiatives which enforce the rights granted under the Fair Housing Act [42 USC 3616a(c)], and State or local laws with equivalent rights and remedies. FHOI strengthens fair housing nationally by assisting in the creation and growth of organizations that focus on fair housing enforcement and awareness. This NOFO makes available competitive funding under the:

- **FHOI – General Component (FHOI-G) - \$25,000,000**
- **FHOI – Sustainable Partnership for Accessibility (FHOI-SPA) - \$10,025,000**
- **FHOI – National Testing Partnership Development (FHOI-NTPD) - \$5,025,000**
- **FHOI – National Intake Support Partnership (FHOI-NISP) - \$5,025,000**
- **FHOI – National Litigation Support Partnership (FHOI-NLSP) - \$5,025,000**

FHOI is one of several initiatives of the Fair Housing Initiatives Program (FHIP).

Through this Notice of Funding Opportunity (NOFO), HUD will award financial assistance under the Fair Housing Organizations Initiative (FHOI) to support projects that strengthen the Nation's private fair housing infrastructure through organizational development, institutional modernization, technical specialization, and collaborative capacity-building.

The funding made available under this competition is intended to create durable organizational improvements that extend beyond the period of Federal financial assistance. Applicants should therefore propose projects that result in sustainable organizational capability rather than solely the completion of discrete project activities.

Consistent with the statutory purposes of FHOI, HUD seeks to support projects that:

- strengthen organizational effectiveness;
- expand fair housing capability into underserved communities and sectors;
- cultivate specialized expertise relevant to fair housing enforcement;
- promote strategic collaboration among organizations with complementary capabilities; and
- improve the long-term capacity of the private fair housing community to advance the purposes of the Fair Housing Act.

FHEO will sponsor applicant training in furtherance of Executive Order 14332, to increase potential applicant understanding of the federal grant application process and of the Fair Housing Initiatives Program with the goal of expanding the applicant pool so that discretionary grants might be awarded to a broad range of eligible recipients.

2. Funding Details

Type of Funding Instrument

CA (Cooperative Agreement)

All component (FHOI-G; FHOI-SPA; FHOI-NTPD; FHOI-NISP; FHOI-NLSP) awards will be in the form of cooperative agreements.

FHEO anticipates that approximately 5 awards will be made from available funding. The number of awards may vary based upon the quantity, quality and eligibility status of the applications received.

Under a cooperative agreement, HUD will exercise the right to approve, and have substantial involvement in, all proposed deliverables, as well as the Work Plan or Statement of Work (SOW).

Where HUD determines that substantial Federal involvement is appropriate, awards may be administered as cooperative agreements. Substantial involvement may include: collaborative project planning; technical consultation; review of significant deliverables; coordination of national initiatives; dissemination of project deliverables; other activities identified in the cooperative agreement. The nature and extent of HUD Participation will be described in the award agreement.

FHEO anticipates that approximately 5 awards will be made from available funding. The number of awards may vary based upon the quantity, quality and eligibility status of the applications received.

Available Funds

Funding of approximately **\$50,100,000** is available through this NOFO.

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

The funds to support awards made from this Notice of Funding Opportunity are from FY2025 and FY2026 appropriations. The total funding of \$50,100,000 includes \$46,000,000 from FY2025 funds and \$4,100,000 from FY2026 funds. Additional funds may become available to support additional awards.

Estimated Number of Awards

5 awards from [available funding](#)

Project start dates will differ by organization; the actual start date of the project period of performance will be determined through negotiations with HUD.

Applicants will submit applications proposing a 24 month project consisting of two separate consecutive 12-month performance and budget periods.

HUD anticipates making awards sufficient to accomplish the objectives of each funding component while ensuring that funded projects possess the resources necessary to achieve meaningful organizational improvements.

The anticipated number of awards reflects the Department's objective of supporting projects with sufficient scope, scale, and duration to produce durable institutional capability. HUD may adjust the number or amount of awards based upon the quality of applications received, available appropriations, program priorities, and other considerations identified in this NOFO.

Nothing in this section obligates HUD to make a specific number of awards under any component.

FHOI – General Component (FHOI-G) - \$25,000,000

Minimum Award: \$5,000,000

Maximum Award: \$25,000,000

The maximum award is \$25,000,000 for a 24-month project period consisting of two consecutive 12-month performance and budget periods, with a maximum amount of \$12,500,000 and a minimum amount of \$5,000,000 per each 12-month consecutive performance and budget period. FHEO expects to make approximately 1 award under this component. These awards will be carried out in the form of cooperative agreements.

FHOI – Sustainable Partnership for Accessibility (FHOI-SPA) - \$10,025,000**Minimum Award: \$5,000,000****Maximum Award: \$10,025,000**

The maximum award is \$10,025,000 for a 24-month project period consisting of two consecutive 12-month performance and budget periods, with a maximum amount of \$5,012,500 and a minimum amount of \$2,500,000 per each 12-month consecutive performance and budget period. FHEO expects to make approximately 1 award under this component. These awards will be carried out in the form of cooperative agreements.

FHOI – National Testing Partnership Development (FHOI-NTPD) - \$5,025,000**Minimum Award: \$2,000,000****Maximum Award: \$5,025,000**

The maximum award is \$5,025,000 for a 24-month project period consisting of two consecutive 12-month performance and budget periods, with a maximum amount of \$2,512,500 and a minimum amount of \$1,000,000 per each 12-month consecutive performance and budget period. FHEO expects to make approximately 1 award under this component. These awards will be carried out in the form of cooperative agreements.

FHOI – National Intake Support Partnership (FHOI-NISP) - \$5,025,000**Minimum Award: \$2,000,000****Maximum Award: \$5,025,000**

The maximum award is \$5,025,000 for a 24-month project period consisting of two consecutive 12-month performance and budget periods, with a maximum amount of \$2,512,500 and a minimum amount of \$1,000,000 per each 12-month consecutive performance and budget period. FHEO expects to make approximately 1 award under this component. These awards will be carried out in the form of cooperative agreements.

FHOI – National Litigation Support Partnership (FHOI-NLSP) - \$5,025,000**Minimum Award: \$2,000,000****Maximum Award: \$5,025,000**

The maximum award is \$5,025,000 for a 24-month project period consisting of two consecutive 12-month performance and budget periods, with a maximum amount of \$2,512,500 and a minimum amount of \$1,000,000 per each 12-month consecutive performance and budget period. FHEO expects to make approximately 1 award under this component. These awards will be carried out in the form of cooperative agreements.

Funding made available through this NOFO reflects FY2025 and FY2026 for the Fair Housing

Organizations Initiative. HUD has structured this competition to implement applicable appropriations language while advancing the longstanding statutory purpose of FHOI.

NOTE: All recipients must expend funds within the specific time periods established and for the purposes approved in annual negotiations.

Length of Performance Period:

24-month project period and budget period

Length of Periods Explanation:

24-month project period consisting of two separate consecutive 12-month performance and budget periods.

B. Agency Contact(s)

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

II. ELIGIBILITY

II. Eligibility

A. Eligible Applicants

B. Eligible Applications

C. Cost Sharing or Matching

II. ELIGIBILITY

A. Eligible Applicants

If your organization is not an eligible applicant, your application won't be reviewed or scored, and you won't receive funding from HUD.

1. Eligible Entity Types:

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

Additional Information on Eligibility

You cannot apply as an individual.

[Faith-based organizations](#) may apply just like any other organization. [HUD does not have any policies or practices that unfairly target these institutions.](#)

HUD will make awards from FY2026 and FY2025 FHEO appropriations through this Notice of Funding Opportunity.

Multiple FHIP Initiative Awards. Consistent with the Department's objective of broadening participation in the Fair Housing Initiatives Program (FHIP), promoting effective stewardship of appropriated funds, and avoiding duplicative Federal funding, HUD generally intends to make no more than one new FHIP award to the same organization during the FY2025/FY2026 funding cycle. Applicants should apply only under the initiative that most closely aligns with the organization's mission, organizational capabilities, and proposed activities.

If an applicant submits applications under more than one FHIP initiative and is selected for funding under multiple initiatives, HUD generally will make only one award. In determining which award to make, HUD may consider the distinct purposes of the initiatives, the proposed statements of work, the potential for duplicative or substantially similar activities, organizational capacity to successfully perform multiple awards, the need to promote broad participation in the FHIP program, and the effective stewardship of Federal appropriations. HUD reserves the discretion to determine whether an exception is appropriate where multiple awards would clearly advance the purposes of the Fair Housing Act and the FHIP statute without resulting in unnecessary duplication or concentration of funding.

In addition, recipients of continuing multi-year PEI awards are not eligible to receive an FY2025/FY2026 FHOI award if the periods of performance would overlap and the recipient elects to continue its existing PEI award.

a. Eligible entities include:

- Qualified fair housing enforcement organizations under 24 CFR 125.501(b)(1)(i);
- Fair housing enforcement organizations under 24 CFR 501(b)(1)(ii);
- nonprofit organizations organizing to build their capacity to provide fair housing enforcement or education and outreach for the purpose of supporting the continued development or implementation of initiatives which enforce the rights granted under the Fair Housing Act, and State or local laws with equivalent rights and remedies;

and

- other public or private nonprofit entities that are formulating or carrying out programs to prevent or eliminate discriminatory housing practices (which might include for example, universities, public interest law firms, religious liberty groups, trade associations, etc.) (42 USC 3616a(a)).

HUD encourages applications from eligible organizations that are capable of developing new fair housing institutional capacity, including organizations without an existing fair housing program, consistent with the historical purposes of FHOI.

Eligibility under this NOFO reflects Congress' intent that FHOI support organizations capable of developing or expanding fair housing expertise. An organization need not demonstrate that fair housing has historically been its primary mission; however, applicants should demonstrate that the proposed project will establish, strengthen, or significantly expand fair housing capability within the organization. Applicants proposing collaborative projects should demonstrate that each participating organization contributes expertise that materially advances the objectives of the proposed project.

b. Additional Eligibility Requirements for Nonprofit Organizations:

Nonprofit applicants must be a 501(c)(3) tax-exempt organization or have a 501(c)(3) application pending prior to the application deadline date and must maintain 501(c)(3) status throughout the period of performance. Applications from nonprofits must include the IRS report showing 501(c)(3) status or pending application status. See [Application Contents, IV.C.](#)

If your organization has a pending 501(c)(3) application and is selected for an award, your 501(c)(3) application/renewal must be approved prior to release of funding. If the pending application is denied, HUD will rescind award selection.

c. Component Specific Eligibility:

FHOI – General Component (FHOI-G): For purposes of this component and to support the initiative to improve the development of capacity and efforts to expand experience in enforcing the Fair Housing Act, HUD strongly encourages Universities with ABA approved law schools to apply, and will award preference points to qualified applicants that are Universities with ABA approved law schools (See Section 5 regarding Application Review.)

FHOI – Sustainable Partnership for Accessibility (FHOI-SPA): For purposes of this component, and to support the initiative to improve development of expertise and experience for future efforts in light of the program objectives, HUD strongly encourages Universities with ABA approved law schools and architecture schools to apply, and will award preference points to qualified applicants that are Universities with both a law school and an architecture school (See Section 5 regarding Application Review.)

FHOI – National Testing Partnership Development (FHOI-NTPD): Applicants may include for example, universities, public interest law firms, religious liberty groups, trade associations, and other eligible entities pursuing efforts in enhancing the enforcement of laws and regulations related to discriminatory housing practices.

FHOI – National Intake Support Partnership (FHOI-NISP): Applicants should include entities that are formulating or carrying out programs to prevent or eliminate discriminatory

housing practices (which might include for example, universities, public interest law firms, religious liberty groups, trade associations, etc.).

FHOI – National Litigation Support Partnership (FHOI-NLSP): Applicants may include for example, public interest law firms, religious liberty groups, and other eligible entities pursuing efforts in enhancing the enforcement of laws and regulations related to discriminatory housing practices.

2. Restrictions

a. Statutory and Regulatory Requirements

You must meet the current [General Statutory and Regulatory Eligibility Requirements](#). If you do not meet these requirements, your application won't be scored, and you won't receive funding from HUD. This is a threshold requirement for all HUD funding.

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

Please see NOFO Sections II. B., III. G., and V. A. 1 - 5, for additional information on restrictions and factors affecting the eligibility of applications for merit review.

b. Resolution of Civil Rights Matters

If you have any outstanding or unresolved judgments for violating civil rights laws, you must settle them before you apply. If you don't, settle the civil rights law violations before you apply, your application won't be scored, and you won't receive funding from HUD. This is a threshold requirement for all HUD funding.

Applicants with outstanding, unresolved matters or judgments against them for violations of civil rights laws must resolve those judgments before the application submission deadline or the applicant will be deemed ineligible. (1) An applicant is ineligible for funding if the applicant has received notice of a judgment imposed against them for violations of: (a) the Fair Housing Act or a substantially equivalent state or local fair housing law for discrimination because of race, color, religion, sex, national origin, disability or familial status; or (b) Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974, the Americans with Disabilities Act, or the Violence Against Women Act or substantially equivalent state or local laws. (2) HUD will determine if actions to resolve the judgment taken before the application deadline date will resolve the matter. Examples of actions that may be sufficient to resolve the matter include, but are not limited to: (a) Current compliance with a voluntary compliance agreement signed by all the parties; (b) Current compliance with a HUD-approved conciliation agreement signed by all the parties; (c) Current compliance with a conciliation agreement signed by all the parties and approved by the state governmental or local administrative agency with jurisdiction over the matter; (d) Current compliance with a consent order or consent decree; or (e) Current compliance with a final judicial ruling or administrative ruling or decision. Applicants with unresolved civil rights matters at the application deadline are deemed ineligible.

B. Eligible Applications

1. An application from an [eligible entity](#) is considered for funding if it meets basic [threshold requirements](#) and passes [merit review](#).
2. Your application must support the [goals](#) of this NOFO.
3. Awards made under this NOFO will not be used to conduct activities that subsidize or facilitate illegal racial preferences or other forms of illegal discrimination, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation.

Program Restrictions on Eligibility:

4. Applicants may not receive funding from both FY2025/FY2026 FHOI and FY2026 PEI or FY2026 EOI. Applicants may not receive funding from both FY2025/26 FHOI and FY2026 PEI or FY2026 EOI.
5. **Separate Statement of Work (SOW) and Budget for each performance period.** You must submit a separate SOW and a separate Form HUD-424-CBW Budget with your application, for each consecutive 12-month performance and budget period that comprise the 24-month project period, or your application will be deemed ineligible and will not be reviewed.
6. HUD will not fund both a parent organization and its affiliate/subsidiary organization under this NOFO for the same component. HUD prohibits affiliate and parent organization staff sharing protocols whereby the parent organization shares key staff with an affiliate(s). All funded organizations must be fully independent functional fair housing enforcement organizations able to conduct business on an ongoing basis without support from a parent or its staff to complete proposed program activities and must be set apart from parent organization.
7. An applicant cannot have received a "poor (unsatisfactory)" rating on a performance assessment on any prior FHIP grant within the past five (5) years. If your organization received a "poor" rating on a performance assessment on any prior FHIP grant within the past five (5) years, the organization is ineligible for funding for a period of five (5) years from the date of the performance assessment. However, if the organization provides evidence that the rating was overturned by FHEO or that another resolution was accepted by FHEO to improve future performance, HUD may reconsider your eligibility.

Additionally, if your organization receives a "poor (unsatisfactory)" performance rating on another FHIP grant after being selected for an award or after receipt of funding under this NOFO, HUD will rescind all remaining grant funds awarded/received under this NOFO, and the organization will remain ineligible for funding for a period of five years, unless it provides evidence as stated above.

8. Your application must meet the following requirements:
 - a. **Fair Housing Related Activities.** All program activities and costs within the SOW and budget must be fair housing related activities and must demonstrate an explicit connection to the non-discrimination provisions of the Fair Housing Act, and/or State or local laws with equivalent rights and remedies.

b. **Fair Housing Act Protected Characteristics.** All FHIP-funded projects must address housing discrimination based on race, color, religion, sex, disability, familial status or national origin.

9. **Funding Request Within the Award Limits.** Applicants are ineligible for funding if the amount requested in the application is not within the minimum and maximum award limits, unless HUD determines that the error is a minor error (such as a typographical error) and that the application clearly requests a funding amount within the award limits.
10. **Inconsistencies in the Requested Amount.** If inconsistent amounts are requested in an application selected for an award, the amount on the SF-424 will be deemed the controlling amount for purposes of determining eligibility and the award amount.
11. **Rating Factors.** An application that does not include a narrative response to each of the four Rating Factors will be deemed ineligible and will not be reviewed.
12. **Nonprofit Status.** Nonprofit applicants must be a private nonprofit charitable 501(c)(3) tax-exempt organization as determined by the Internal Revenue Service (IRS). All nonprofit recipients must maintain 501(c)(3) status throughout the grant period. Nonprofit applicants must verify 501(c)(3) status in accordance with 24 CFR 5.109(1). See Eligible Entity Types (II.A.1.b.).
13. **Operating Budget.** In order to ensure funding supports sustainable fair housing partnerships, and consistent with the requirements of 42 USC 3616a(c)(1), FHIP funding may not provide more than 50% of the operating budget of the recipient organization for any one year.

C. Cost Sharing or Matching

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

If your application project and budgets include cost sharing or matching, you will be required to provide those proposed funds if selected for an award, or the award will be rescinded.

In accordance with Section V. B. 1. Rating Factor 1, applicants that can demonstrate diversified funding resources will receive higher scores for this factor.

III. PROGRAM DESCRIPTION

III. Program Description

A. Purpose

B. Goals and Objectives

C. Authority

D. Unallowable Costs

E. Indirect Costs

III. PROGRAM DESCRIPTION

A. Purpose

Congress established the Fair Housing Initiatives Program (FHIP) with a purpose of providing funding to entities to work alongside HUD to "prevent or eliminate discriminatory housing practices" 42 USC § 3616a(a). Congress determined in 1988, and affirmed each year since then through appropriations, that HUD can only achieve its fair housing mission and obligations by supporting a network of organizations helping to educate the public about and enforce fair housing rights. Initially a demonstration program, Congress made FHIP permanent through the Housing and Community Development Act of 1992. The program was expanded in 1992 to address building capacity in unserved areas, establish a national media campaign, and fund a National Fair Housing Month.

FHIP provides funds to eligible organizations through competitive grants under four initiatives: the Fair Housing Organization Initiative (FHOI), the Private Enforcement Initiative (PEI), the Education and Outreach Initiative (EOI), and the Administrative Enforcement Initiative (AEI).

This NOFO funds the FHOI to provide cooperative agreements to eligible nonprofit organizations to build their capacity to provide fair housing enforcement, or education and outreach, for the purpose of supporting the continued development or implementation of initiatives which enforce the rights granted under the Fair Housing Act, and State or local laws with equivalent rights and remedies; and/or other public or private entities that are formulating or carrying out programs to prevent or eliminate discriminatory housing practices.

Components:

HUD has made \$50,100,000 available for the FHOI with FY2025 and FY2026 funds. The funding is divided among the following components:

- **FHOI – General Component (FHOI-G) - \$25,000,000.** The purpose of FHOI-G is to build fair housing enforcement capacity to carry out special projects, including the development of prototypes to respond to new or sophisticated forms of discrimination. The component includes two special focus areas: State and Local Housing Discrimination, and Religious Liberty Protection.
- **FHOI – Sustainable Partnership for Accessibility (FHOI-SPA) - \$10,025,000.** The purpose of FHOI-SPA is to increase accessibility compliance capacity overall, including to develop technical accessibility expertise and interdisciplinary partnerships.
- **FHOI – National Testing Partnership Development (FHOI-NTPD) - \$5,025,000.** The purpose of FHOI-NTPD is to build investigative capacity by recruiting and supporting nonprofit organizations, universities, technical institutions, and other eligible entities possessing demonstrated investigative, analytical, scientific, technological, or methodological expertise that can be adapted to fair housing testing.
- **FHOI – National Intake Support Partnership (FHOI-NISP) - \$5,025,000.** FHOI-NISP is to strengthen coordinated intake, referral, case-routing, and related organizational systems of fair housing organizations to improve public access to fair

housing services.

- **FHOI – National Litigation Support Partnership (FHOI-NLSP) - \$5,025,000.** The purpose of FHOI-NLSP is to develop fair housing litigation capacity within organizations possessing adjacent civil-rights expertise.

Please see Section III. G. for the full description of FHOI components.

Unused funds from one FHOI component can be redistributed to other FHOI components at the discretion of HUD.

If you qualify for multiple components, you may apply for more than one.

The Fair Housing Organizations Initiative (FHOI) is the organizational capacity-building component of the Fair Housing Initiatives Program (FHIP). Congress established FHOI to strengthen the Nation's ability to prevent and eliminate discriminatory housing practices by supporting the development, expansion, diversification, and long-term sustainability of organizations capable of carrying out fair housing activities.

Since its enactment, FHOI has supported the creation of new fair housing organizations, the continued development of existing organizations, expansion into underserved communities, and development of specialized institutional expertise necessary to address evolving forms of housing discrimination.

Consistent with the Fair Housing Act and 24 CFR Part 125, HUD administers FHOI through Notices of Funding Opportunity identifying funding priorities that address contemporary fair housing challenges while remaining consistent with the program's longstanding organizational development mission.

Purpose of the Fair Housing Organizations Initiative

The Fair Housing Organizations Initiative (FHOI) is HUD's strategic investment program for developing and sustaining the Nation's private fair housing infrastructure.

Congress established FHOI as the organizational development component of the Fair Housing Initiatives Program (FHIP) to strengthen the ability of private nonprofit organizations and their partners to advance the purposes of the Fair Housing Act. Through annual Notices of Funding Opportunity, HUD administers FHOI by making strategic investments that expand organizational capability, cultivate specialized expertise, encourage interdisciplinary partnerships, modernize operational capacity, and strengthen the long-term effectiveness of the private fair housing community.

Consistent with the statutory framework, implementing regulations, and the historical administration of FHIP, the Department structures each annual competition to address emerging needs while maintaining the enduring purpose of strengthening the Nation's private fair housing infrastructure. Accordingly, the FY2025/FY2026 FHOI competition is organized as a portfolio of complementary investments that collectively enhance organizational capability, technical expertise, collaboration, and sustainable institutional capacity.

Evolution of the Fair Housing Initiatives Program

Since the inception of the Fair Housing Initiatives Program, HUD has administered FHIP through annual funding announcements that identify program priorities consistent with the

Fair Housing Act, implementing regulations, and available appropriations. Over time, these annual competitions have introduced specialized funding components, expanded eligible activities, encouraged new organizational partnerships, supported emerging fair housing priorities, and refined administrative approaches in response to experience gained through program implementation.

Historical evaluations of FHIP document the Department's longstanding practice of adapting program components to strengthen fair housing education, enforcement, organizational development, and administrative effectiveness while maintaining consistency with the underlying statutory and regulatory framework. The Department views the FY2025/FY2026 competition as a continuation of this historical practice of administrative refinement and program improvement.

Evolution of the Fair Housing Organizations Initiative

Unlike other initiatives that emphasize education and outreach, private enforcement, or administrative enforcement, FHOI is intended to build institutional capability. Since its establishment, the Fair Housing Organizations Initiative (FHOI) has served as HUD's principal organizational development initiative within the Fair Housing Initiatives Program (FHIP). While the statutory purpose of FHOI has remained consistent—to strengthen the Nation's private fair housing infrastructure—the Department has periodically refined the initiative through annual Notices of Funding Opportunity to address evolving organizational needs, emerging fair housing issues, and changing opportunities for capacity development.

Historically, HUD has implemented FHOI through a variety of funding strategies designed to strengthen organizational capability, expand technical expertise, encourage strategic partnerships, modernize operational systems, and cultivate new institutional participants capable of advancing the purposes of the Fair Housing Act. These refinements have included specialized funding components, partnership initiatives, demonstration projects, and other program innovations documented throughout the administrative history of FHIP.

The FY2025/FY2026 competition continues this historical practice. Rather than altering the statutory purpose of FHOI, this NOFO identifies funding priorities intended to strengthen different dimensions of the Nation's private fair housing infrastructure through complementary investments in organizational development, specialized capability, strategic collaboration, and sustainable institutional capacity.

Strategic Investment Framework

HUD administers the Fair Housing Organizations Initiative as an integrated portfolio of complementary investments intended to strengthen the Nation's private fair housing infrastructure. Each funding component contributes to a distinct dimension of organizational capability while supporting the common objective of improving the long-term effectiveness of private organizations engaged in fair housing activities.

The Department recognizes that strengthening the Nation's fair housing infrastructure requires investment in multiple forms of organizational capability. Accordingly, the FY2025/FY2026 competition includes funding components that support organizational development, strategic partnerships, specialized technical expertise, national support functions, and other initiatives designed to expand the capacity, resilience, and effectiveness

of the private fair housing community.

Funding allocations among components reflect the differing organizational strategies employed to accomplish these objectives and the level of investment reasonably necessary to achieve meaningful and sustainable organizational outcomes. Differences in funding levels should not be interpreted as reflecting the relative importance of one objective over another. Rather, the allocations represent HUD's administrative judgment regarding the most effective distribution of available resources to achieve a balanced portfolio of investments supporting the Nation's private fair housing infrastructure.

Allocation of Available Funding

HUD has allocated available funding among the Fair Housing Organizations Initiative funding components based upon the objectives of each component, the anticipated scope and complexity of funded projects, the level of investment necessary to achieve meaningful organizational outcomes, and the Department's objective of maintaining a balanced portfolio of investments that collectively strengthen the Nation's private fair housing infrastructure.

The funding available under each component reflects the differing organizational strategies employed to advance the purposes of FHOI. Some components are intended to support numerous projects that strengthen local and regional organizational capability, while others support a smaller number of projects requiring specialized expertise, national coordination, or development of shared resources benefiting the broader fair housing community.

Accordingly, differences in funding levels among components should not be interpreted as reflecting the relative importance of one program objective over another. Rather, the funding distribution reflects HUD's administrative judgment regarding the level of investment reasonably necessary to accomplish the distinct objectives of each component and to achieve an appropriate balance among complementary investments supporting the long-term development of the Nation's private fair housing infrastructure.

Strategic Partnership Development

Since its establishment, the Fair Housing Initiatives Program has employed a variety of approaches to expand the Nation's private fair housing infrastructure and encourage participation by organizations possessing complementary expertise. These approaches have included targeted initiatives encouraging collaboration with institutions of higher education and other community-based organizations.

These initiatives reflected HUD's recognition that advancing the purposes of the Fair Housing Act often requires interdisciplinary expertise, broad community engagement, and the development of new institutional capacity. Building upon this history, the current Fair Housing Organizations Initiative competition encourages strategic partnerships that expand organizational capability, strengthen technical expertise, and cultivate new participants capable of contributing to the Nation's long-term fair housing infrastructure. Such partnerships are intended to advance the statutory purposes of FHOI by increasing the variety, resilience, and effectiveness of organizations engaged in fair housing activities.

Components:

HUD has organized the FY2025/FY2026 FHOI competition around five complementary funding components. Each component supports the development of a distinct form of

organizational capability while contributing to the common objective of strengthening the Nation's private fair housing infrastructure.

Applicants should apply under the component(s) that most closely align(s) with the principal objective of the proposed project. Although each component has separate eligibility requirements and evaluation criteria, the components are intended to operate together as complementary investments supporting organizational development throughout the private fair housing community.

Projects that establish meaningful collaboration among organizations with complementary expertise are encouraged where such partnerships materially strengthen organizational capability and advance the objectives of the selected component.

The FHOI components are framed around institutional capacity development, for example:

- **FHOI – General Component (FHOI-G) – Builds broad organizational capacity**
- **FHOI – Sustainable Partnership for Accessibility (FHOI-SPA) – Builds technical capacity**
- **FHOI – National Testing Partnership Development (FHOI-NTPD) – Builds investigative capacity**
- **FHOI – National Intake Support Partnership (FHOI-NISP) – Builds coordination capacity and technical capacity**
- **FHOI – National Litigation Support Partnership (FHOI-NLSP) – Builds legal capacity**

Each funding contributes to a distinct aspect of institutional development. Applicants should select the component that most closely corresponds to the principal objective of the proposed project. Although each component has unique requirements, the components are intended to operate together as complementary investments in the nation's long-term fair housing capacity.

B. Goals and Objectives

The FHOI goal is to increase and/or enhance fair housing enforcement related activities in communities throughout the nation to address, prevent and eliminate housing discrimination so that everyone has access to a quality, affordable home.

HUD's Office of Fair Housing and Equal Opportunity (FHEO), and by extension, the FHIP program, is returning to the core of the Fair Housing Act's enforcement regime – protecting individuals from intentional discrimination based on race, color, national origin, religion, sex, disability, or familial status. FHEO rejects expansive interpretations of the Fair Housing Act that exceed the statutory text; will eliminate from the FHIP program ideologically driven enforcement priorities that do not serve Americans experiencing actual discrimination; and will ensure equal treatment under the law regardless of race – including through enforcement against illegal preferences and unlawful discrimination. Applicants are to apply for available FHIP awards which are involved in the education and development of expertise in the areas of Fair Housing, including enforcement, protections, investigations, as well as activities related to disabilities and reasonable accommodations. By restoring the FHIP program to its

original goals, HUD will focus enforcement resources on cases of intentional discrimination that are causing real harm to real people and ensure that all American's rights to fair housing access are protected.

Implementation of activities that were unsupported by original FHIP program goals resulted in FHEO not fully meeting its intended goals, leading to waste of taxpayer dollars, and too often the production of low-quality, redundant deliverables. These uses of funds reflected and were guided by HUD's own priorities that deviated from the original statutory goals of the FHA and led HUD to promote misguided priorities that led to its own backlog. This was evidenced by the conclusions in the Office of Inspector General report, dated September 24, 2024, that found that the prior administration left a backlog of unresolved cases and failed to comply with its statutory obligations. FHEO has found that in part this was due to a lack of prioritization for actual intentional cases of discrimination. This backlog reflected HUD's priorities that were passed on to the FHIPs programs and grant awards. ([FHEO Faces Challenges in Completing Investigations Within 100 Days | Office of Inspector General, Department of Housing and Urban Development.](#))

In addition, the manner in which HUD historically administered the FHIP program created an expectation that FHIP funding would be awarded in a manner akin to formula-based funding to largely the same list of agencies rather than through a truly competitive process. Few first-time applicants received grants, undermining the competitive nature of the program.

1. **Expanding Competition.**

In order to restore the competitive nature of the FHIP PEI award, with this NOFO we have included preference points to be awarded to new applicants under the FHIP program. This is consistent with the direction provided in the recent executive order (EO 14332: Improving Oversight of Federal Grantmaking – The White House) to broaden participation in federally funded programs.

The order states, with respect to "Considerations for Discretionary Awards", that: "In reviewing and approving funding opportunity announcements and discretionary awards, as well as in designing the review process...[the Agency] shall, as relevant and to the extent consistent with applicable law, apply the following principles, including in any scoring rubrics used to assess grant proposals... Discretionary grants should be given to a broad range of recipients rather than to a select group of repeat players..."

Consistent with the intent of the authorizing statute and the implementing regulations, FHEO intends to expand the number and types of organizations engaging in fair housing enforcement and outreach through the FHIP program. Outreach to a broader pool of applicants opens the possibility of benefiting from those with additional experience outside of the FHIP program that may have helpful insights. FHEO is offering training opportunities to support new entrants to the program.

The inclusion of these preference points in this NOFO incentivizes new, first-time applicants to apply for the available FHIP awards.

2. **Grantee Funding Requirements.**

With this NOFO, we are encouraging applicants to secure other resources to supplement

the HUD award. Also, in order to ensure FHIP funding supports sustainable fair housing partnerships, FHIP funding awards will not provide more than 50% of the operating budget of the recipient organization for any one year.

This is consistent with the history of the FHIP program. In fact, historically, "organizations that appl[ied] for FHIP awards receive[d] points if they demonstrate[d] that they ha[d] other sources of funding to support fair housing activities. Therefore, the expectation is that FHIP awards will not provide 100 percent of grantees' total funding." (HUD PD&R Study of the Fair Housing Initiatives Program, 2011)

This aligns with the authorizing statute for FHIP, which when addressing the funding of fair housing organizations by HUD provides that awards, "...may not provide more than 50 percent of the operating budget of the recipient organization for any one year." (42 USC 3616a(c)(1))

Also, at the time of the initial FHIP rulemaking, "[t]he Department's FHIP NOFAs ... require[d] applicants to submit an operating budget that describes the applicant's total planned expenditures from all sources, including the value of in-kind and monetary contributions, in the year for which funding is sought. This is required so that the 50% budget determination pursuant to ... section 125.502(c)(1) may be made. To memorialize this requirement under a rule is not necessary."

3. Ending Waste, Fraud and Abuse.

The Administration has recently established a waste fraud and abuse task force of which HUD is a member. (EO 14395: [Establishing the Task Force to Eliminate Fraud – The White House](#))

In addition, a recent executive order (EO 14332: [Improving Oversight of Federal Grantmaking – The White House](#)) addressed the risk of waste, fraud and abuse in discretionary grant making, and the need for enhanced management and oversight of these awards. The order was promulgated in order "to improve the process of Federal grantmaking while ending offensive waste of tax dollars." It provides that, "[e]very tax dollar the Government spends should improve American lives or advance American interests..." although, "this often does not happen."

"The harm imposed by problematic Federal grants" includes but "*does not stop at propagating absurd ideologies*" as, "...even for projects receiving Federal funds that serve an ostensibly beneficial purpose, the Government has paid insufficient attention to their efficacy..." and, in fact, "the best proposals do not always receive funding, and there is too much unfocused research of marginal social utility... In short, there is a strong need to strengthen oversight and coordination of, and to streamline, agency grantmaking to address these problems, prevent them from recurring, and ensure greater accountability for use of public funds more broadly. The Government holds tax revenue in trust for the American people, and agencies should treat it accordingly."

This is a risk that prior HUD-FHEO leadership has recognized, and prioritized. FHEO has clearly stated that, "[i]n managing risk in the Fair Housing Initiatives Program (FHIP) and Fair Housing Assistance Program (FHAP), FHEO staff should consider **risk of fraud, waste, abuse, mismanagement, and failure to accomplish funded activities.**" (FHEO Notice:

2002-01)

Waste, fraud and abuse were issues that commenters raised in the public comments docket when the initial FHIP regulation was finalized. At the time of the FHIP rulemaking in 1995, commenters "stressed the need for regulatory controls to ensure" that FHIP agencies are "objective and credible." They also "stressed the need for the Department to ensure that grantees do not have any conflicts of interest which might interfere" with, and that FHIP agencies have "the integrity to conduct" fair housing enforcement activities.

This NOFO will take a number of actions in furtherance of the Administration's efforts to eliminate waste, fraud and abuse, including enhancing the documentation around our risk-based review of grantees. For example, we have increased the weight of the risk score. In addition, we have included new Criminal Background, Conflict of Interest, and Integrity Sections in the NOFO. We have also expanded the performance history review to 5 years. Applicants with unresolved civil rights matters at the application deadline are deemed ineligible.

At the time of the FHIP rulemaking in 1995, HUD stated that, "[i]n reviewing applications, the Department... considers an applicant's experience in formulating and carrying out programs to prevent or eliminate discriminatory practices, including the applicant's management of past and current FHIP or other civil rights projects. Any past misconduct by an applicant is taken into account during this review." This was prudent practice in 1995, and it is still prudent practice. HUD will conduct a comprehensive and thorough review process for all grantees.

C. Authority

FHIP is authorized by the Fair Housing Act, as amended by Section 561 of the [Housing and Community Development Act of 1987 \(42 U.S.C. 3616a\)](#). The Fair Housing Organizations Initiative is specifically authorized under 42 U.S.C. 3616a(c). The FHIP implementing regulations are found at 24 CFR part 125 and FHOI is outlined at Section 125.501.

Funding for this program is provided by Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4, approved March 15, 2025), and Consolidated Appropriations Act, 2026 (Public Law 119-75, approved February 3, 2026).

Unless expressly stated, this NOFO should be interpreted as implementing the existing regulatory framework rather than establishing new categories of eligible activity.

D. Unallowable Costs

1. **Retainer Fees.** FHIP recipients are under specific restrictions (outlined in the cooperative agreement documents) regarding establishment of retainer agreements and recovery of legal fees from HUD-funded cases. Data on fees, settlements, and verdicts are matters of public record. Awardees must provide this information to HUD annually. Neither the grantee nor the individual(s) on whose behalf any action is filed can request that HUD waive these provisions. See also Section III.G.3. herein.
2. **Compensation.** Grantees cannot charge more than Level IV of the Federal Executive Schedule annually for an individual's compensation even if the individual earns more than the capped amount. This compensation cap does not require grantees to limit the amount paid to individuals under this grant; however, the individual's remaining

compensation over the cap must be paid from an alternative organization funding source. HUD reserves the right to determine whether compensation is reasonable and customary for the skill set provided and the areas being served.

3. **Eligible Activities.** HUD will not fund ineligible activities in a proposal and will not fund a proposal with more than 50% ineligible activities. Activities must be fair housing activities. Housing counseling activities are not eligible costs under the program.
4. **Award Specific Activities.** Recipients may only use funding awarded under this NOFO for the specific activities included in the application submitted under this FHOI NOFO and approved through negotiations. Funded applicants may not co-mingle funds to support other FHIP grant activities.
5. **Allowable Costs.** Recipients may only use funds for allowable costs, as defined in 2 CFR 200.403 and further detailed in the Terms and Conditions, such as costs necessary and reasonable to carry out eligible activities. See 2 CFR 200 Subpart E for detailed rules on cost principles.
6. **Suits Against the United States.** FHIP Grantees may not use HUD funds to pay expenses related to litigation the United States. If your organization has been involved in litigation against the United States within the past three years, you will be required to provide documentation that demonstrates all FHIP grant funds were segregated and not co-mingled with the funds used to engage in such litigation.
7. **Other Litigation.** Applicants cannot propose to use funds under this NOFO application, or have used HUD funds to fund or support the settlement of a claim, satisfy a judgment, or fulfill a court order in any defensive litigation involving HUD or housing providers funded by HUD within the past three years. 42 U.S.C. §3616a(i).
8. **Projects aimed solely at research or data gathering are not eligible activities.** If a successful application contains research and related activities, only the eligible portions of the application will be funded; the ineligible research and related activities may not comprise more than 50% of the applicant's proposed grant activities or the application is ineligible for funding. In addition, all proposed surveys/data gathering must be approved by HUD and the OMB under the Paperwork Reduction Act before the application submission, or the activity is deemed ineligible.

E. Indirect Costs

If you expect to charge [indirect costs](#) to the award, submit the Indirect Cost Information for Award Applicant/Recipient form (HUD-426) with your application.

Indirect costs are costs incurred for common or joint purposes, such as general overhead and costs of general management, oversight, and coordination. These costs benefit more than one cost objective and cannot be readily identified with a particular final cost objective without effort disproportionate to the results achieved. Examples of indirect costs:

- Fiscal tracking of grants funds.
- Accounting staff wages and benefits.
- Depreciation of office equipment, general insurance, and general office supplies

incurred for common or joint purposes.

One hundred percent of the salaries and fringe benefits related to general management or oversight functions serving a common or joint purpose are indirect costs. Salaries and benefits related to implementing your project or program elements of your grant agreement are direct costs.

2. Direct Costs

As defined in 2 CFR 200.413, direct costs are those that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. You will need to specify costs in your *Budget Narrative and Budget Worksheet, HUD-424-CBW*.

Salaries and fringe benefits related to the implementation of the project or program element of the grant 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 outlined in the program are not administrative costs.

Examples of direct costs usually chargeable to FHIP grants include:

- Compensation of employees for the time devoted specifically to award performance and associated fringe benefits.
- Materials bought, consumed, or spent specifically for the award.
- Equipment necessary to carry out the award.
- Reasonable travel expenses necessary to carry out the award.
- Approved/reasonable translation and interpretation necessary to carry out the award.
- Reasonable information technology systems and services necessary to carry out the award.
- Litigation costs, such as costs of gathering evidence, necessary to carry out the award.
- Reasonable transportation costs, such as public transportation passes, to support a client's ability to take part in eligible services.
- Proportional professional licensing fees, professional liability insurance, and professional development costs, such as conference and travel costs or training in eligible services or skills, necessary to carry out the award.
- Outreach, educational, and marketing costs/materials necessary to carry out the award.

a. You may use FHIP funds for the lease or rental of space for eligible activities if each of the following conditions is met:

- i. The lease must be for existing facilities not requiring rehabilitation or construction except for minimal alterations to make the facilities accessible to and usable by individuals with disabilities;
- ii. no repairs or renovations of the property may be undertaken with grant funds; and

iii. properties in the Coastal Barrier Resources System designated under the Coastal Barrier Resources Act (16 U.S.C. 3501) cannot be leased or rented with federal funds.

b. Administrative and clerical staff salaries may be treated as direct costs if each of the following conditions are met:

- i. Administrative or clerical services are integral to Section III.F. such as conducting work with tenants, coordinating with other organizations serving tenants, or maintaining client files;
- ii. Individuals involved can be specifically identified with the activity;
- iii. Such costs are explicitly included in the budget or have the prior written approval of HUD; and
- iv. The costs are not also charged as indirect costs.

Changes from the FY2024 FHIP FHOI NOFO, republished (FR-6900-N-21-B):

- Applicants may submit applications for five components under this NOFO: FHOI – General Component (FHOI-G); FHOI – Sustainable Partnership for Accessibility (FHOI-SPA); FHOI – National Testing Partnership Development (FHOI-NTPD); FHOI – National Intake Support Partnership (FHOI-NISP); and FHOI – National Litigation Support Partnership (FHOI-NLSP). The FY2024 NOFO had two components.
- The maximum award amount varies between \$5,025,000 to \$25,000,000 depending on the component over the 24-month project period. FY2024 FHOI CDC awards were capped at \$260,000 over a 12-18 month project period.
- Each applicant under this NOFO must submit a separate SOW and Budget for each of the two consecutive 12-month performance and budget periods of the 24-month project. Failure to do so will result in the application being deemed ineligible; ineligible applications will not be reviewed.
- This NOFO will make awards from two funding years: FY2025 and FY2026 appropriations.
- Applicants will submit Federal Assistance Funding Matrix and Certifications (HUD-424-M) with their application.
- **Expanding Competition:** In order to restore the competitive nature of the FHIP FHOI award, with this NOFO we have included up to four (4) preference points to be awarded to applicants involved in the development of educational activities related to fair housing, disability discrimination, including reasonable accommodations and modifications, and design and construction requirements relating to accessibility. Many of these will include educational institutions including law and architecture programs that focus on the education and development of specialists in this area. This is consistent with the goals outlined above to increase a broader range of applicants for HUD grants along with the direction under the Grantmaking EO (EO 14332: [Improving Oversight of Federal Grantmaking – The White House](#)) to broaden participation in HUD programs.

- **Grantee Funding Requirements: Diversified Funding Sources** - With this NOFO, applicants are encouraged to secure the use of other resources to supplement the HUD award. (See 24 CFR 125.105(d)) Applicants that can demonstrate diversified funding resources will receive higher scores in the merit review. Historically, this has been a consideration in FHIP awards (See discussion above.) Operating Budget - In order to ensure funding supports sustainable fair housing partnerships, and consistent with the requirements of 42 USC 3616a(c)(1), FHIP funding may not provide more than 50% of the operating budget of the recipient organization for any one year. Applicants seeking to fund more than 50% of their Operating Budget for any single year are ineligible.
- **Ending Waste, Fraud and Abuse:** With this NOFO we have enhanced the documentation around our risk-based review of grantees. We have increased the weight of the risk score – if an applicant is deemed "high risk" there is a five (5) point reduction in the overall rating score. We have included new Criminal Background, Conflict of Interest, and Integrity Sections to the NOFO. We have expanded the performance history review to 5 years.

An applicant cannot have received a "poor/unsatisfactory" rating on a performance assessment on any prior FHIP grant within the past five (5) years or they will be ineligible for funding under this NOFO.
- **Expanded Stakeholder Groups:** For this NOFO, applicants may receive one (1) preference point if they can demonstrate cooperation with real estate industry organizations. Historically, this sort of cooperation has been frequently cited as achieving positive results for the program. See HUD PD&R Study of the Fair Housing Initiatives Program, 2011. Also, the FHIP regulations at 24 CFR 125.301 indicate that preference points for expanded stakeholder groups would be beneficial.

1. Eligible Activities

a. All FHOI Awards

- All work and costs within the SOW and budget must involve conduct prohibited by, or rights protected under the Fair Housing Act, or State or local laws with equivalent rights and remedies. Your application must demonstrate an explicit connection to these Fair Housing laws or to actions or inactions that may violate them.
- HUD will not fund any portion of an application that is not eligible for funding or that does not meet the requirements under this NOFO.
- Projects must propose reasonable steps to ensure meaningful program access and effective communication to all individuals.
- Coordination with Fair Housing Assistance Program (FHAP) participants: Each non-governmental recipient of regional, local, or community-based funding for activities located within the jurisdiction of a State or local enforcement agency or agencies administering a substantially equivalent fair housing law (FHAP agency) must consult with the agency or agencies to coordinate activities funded under FHIP.

b. Component Specific Eligible Activities

- **FHOI – General Component (FHOI-G), Institutional Development and Innovation FHOI Component:**

The FHEO General Component is the principal institutional development initiative supporting organizational formation through transformation, partnerships, leadership development, resilience and sustainability. The FHOI General Component requires a broad-based project that may include elements that are also identified generally in the Education and Outreach component and/or the Enforcement components of the FHOI (see below) that have the overall purpose of improving organizational capacity.

Supports projects that establish, strengthen, expand, or modernize the organizational capability of nonprofit organizations for fair housing activities. Illustrative objectives include: organizational development;

leadership development; technology modernization; strategic planning for financial sustainability; and/or expansion of fair housing capability into underserved communities.

You must demonstrate in your application that you will run a broad-based project (as defined under Appendix I.B., *Program definitions*). If you have income or other restrictions for services, you must identify the restriction(s) and describe how individuals who fall outside the restrictions will be equally served.

Your project must address all types of housing discrimination based on race, color, religion, sex, disability, familial status, and national origin and further the Fair Housing Act. Your services and activities must reflect your organization's commitment to enforce fair housing laws on behalf of all individuals.

HUD is encouraging entities that provide education on the Fair Housing Act and its related laws and regulations including ABA accredited law schools and university public law clinics to apply. All activities must have a direct connection to the Fair Housing Act or issues that may violate the Act and may include outreach to other law schools to increase understanding of fair housing law and obligations.

Eligible Activities under the FHOI-G include the following activities appropriate to a broad-based, full-service fair housing enforcement program developed in coordination with FHEO that improves organizational capacity:

- For enforcement activities to identify and remedy potential violations of the Fair Housing Act; and /or
- To increase education and outreach related capability that support fair housing enforcement and the goals of the program.

Specific projects that would support the goals and objectives of this award might include:

- Development of law school curriculum focused on fair housing rights and remedies, including constitutional and statutory limitations of enforcement
- Expanding support networks for property owners (not simply buyers or renters), including for small landlords, that may not have access to legal counsel
- Educating complainants and respondents on their rights and responsibilities

- Provide assistance to the general public through legal clinics to promote awareness, enable enforcement, provide legal counsel, complaint intake, and legal assistance
- Developing opportunities for law students to gain practical experience in fair housing law, for instance through clinical education and internships (these may also focus on arbitration/mediation of meritorious claims)
- Coordinating/facilitating regional and national convenings focused on fair housing related topics
- Conduct training and other educational programming related to fair housing
- Authoring and publishing fair housing related materials

FHOI-G provides funding to build capacity to carry out special projects, including the development of prototypes to respond to new or sophisticated forms of discrimination. This NOFO includes two special focus areas for enforcement, education and outreach activities that are designed to improve organizational capacity:

- State and Local Housing Discrimination Focus Area.** Develop enforcement strategies to respond to government-sanctioned housing discrimination that violates the Fair Housing Act. *See also* 42 USC §3615. Identify potential violations of the Fair Housing Act by state or local jurisdictions and public housing agencies (PHAs) receiving federal funds for housing and urban development that maintain programs that in any way consider a protected characteristic except where explicitly required or authorized by federal law. For example, actions taken under the pretext of asserted furtherance of preventing displacement and/or increasing housing choice. The award may include education and outreach related activities that support fair housing enforcement and the goals of the program, for example that inform the public that discrimination based on a protected characteristic is illegal under the Fair Housing Act and state or local laws and regulations that violate the Fair Housing Act are invalid. You must also describe a referral process that will result in referral of any fair housing complaints to HUD.
- Religious Liberty Protection Focus Area.** Develop enforcement strategies to respond to religious discrimination, including but not limited to instances of anti-Christian or anti-Semitic bias. The award may include education and outreach related activities that support fair housing enforcement and the goals of the program, for example that inform the public that religion is a protected characteristic, and the Fair Housing Act bars discrimination based on religion. You must also describe a referral process that will result in referral of any fair housing complaints to HUD.

Grantees must coordinate activities with other fair housing organizations, including FHIPs and FHAPs where appropriate.

Grantees must refer potential violations to HUD or substantially equivalent state, local or other government agencies for further enforcement actions. Applicants must describe a referral process that will result in referral of fair housing complaints to HUD or substantially equivalent state, local or other government agencies. If funded, the grantee will have to develop and implement the complaint referral process referenced in the application.

Grantees should describe how the project would be integrated into the local and regional housing market, including through outreach to multiple housing stakeholder groups, such as large and small landlords, developers, and first time homebuyers.

ii Education and Outreach Capacity Focused Component(s):

The Education and Outreach component(s) of FHOI provide funding to eligible nonprofit organizations to develop the capacity to carry out coordinated education and outreach efforts to inform individuals, communities, housing providers and other stakeholders about their fair housing rights and obligations under the Fair Housing Act.

Specific eligible activities vary between different FHOI components.

- **FHOI – Sustainable Partnership for Accessibility (FHOI-SPA)**

The purpose of this component is to strengthen the Nation's private fair housing infrastructure by encouraging strategic partnerships among organizations possessing complementary expertise that can materially advance fair housing capability.

The FHOI-SPA component is designed to increase Accessibility Compliance Capacity overall. Applicants should propose projects that develop technical accessibility expertise and interdisciplinary partnerships. Applicants are encouraged to develop partnerships with organizations that contribute specialized knowledge, technical expertise, research capability, educational resources, community engagement, communications capacity, or other competencies that strengthen the long-term effectiveness of the fair housing infrastructure.

FHOI-SPA provides funds for a variety of educational and outreach purposes that are designed to improve organizational capacity. All activities must have a direct connection to the Fair Housing Act or issues that may violate the Act, and may include outreach to other universities to increase understanding of fair housing law and obligations.

Supports collaborative projects through which organizations possessing complementary expertise jointly strengthen institutional fair housing capability.

Illustrative partnerships may include collaborations among fair housing organizations and entities possessing expertise in accessibility, legal services, planning, technology, communications, education, housing policy, or other disciplines directly relevant to advancing fair housing objectives.

Projects should demonstrate how the partnership will create sustainable organizational capability that continues beyond the period of Federal assistance.

The FHOI-SPA is designed to carry out projects that prevent or eliminate discriminatory housing practices by establishing or supporting national, regional, local, and community-based education and outreach activities, events, and programs.

The FHOI-SPA NOFO includes a special focus area for education and outreach activities targeted at **Accessible and Affordable Housing**. Applicants should look to this common theme in the development of all fair housing materials.

Eligible Activities under the FHOI-SPA may include the following activities as appropriate to a fair housing education and outreach program developed in coordination with FHEO:

- taking part in a national coordinated effort to develop and disseminate creative and

innovative fair housing education and outreach materials and media products, including implementing national fair housing month-related activities;

- developing and distributing fair housing materials (e.g., brochures, webinars, and social media advertising);
- conducting educational symposia or other training;
- providing fair housing information and outreach through printed and electronic media to provide meaningful program access and effective communication to all individuals with protected characteristics applicable to communities in the proposed project area (i.e., Public Service Announcements for radio, television, and newspaper advertisements); and/or
- conducting education and outreach events to engage the public, housing providers and industry professionals, religious and community groups, advocacy and tenant groups, law schools and colleges, or/and other stakeholders.

All materials created must demonstrate a connection to furthering the non-discrimination provisions of the Fair Housing Act. Where possible, public outreach content should be localizable for use by other FHIP and/or FHAP organizations engaging in local fair housing education and outreach campaigns.

Specific projects that would support the goals and objectives of this award and lead to expanding the capacity of the organization might include:

- Development of law school curriculum focused on fair housing rights and remedies, including constitutional and statutory limitations of enforcement
- Development of architecture school curriculum focused on accessible housing design
- Development of innovative methods to increase compliance, such as designing and deploying AI or web-based tools to assess/improve accessibility
- Support for property owners (not simply buyers or renters), including for small landlords that may not have access to legal counsel
- Educating complainants and respondents on their rights and responsibilities
- Provide assistance to the general public through legal clinics to promote awareness, enable enforcement, provide legal counsel, complaint intake, and legal assistance
- Developing opportunities for architects, law students, and other students to gain practical experience in fair housing, for instance through clinical education and internships (these may also focus on arbitration/mediation of meritorious claims)
- Coordinating/facilitating regional and national convenings focused on accessible design and fair housing related topics
- Conduct training and other educational programming related to accessible design and fair housing related topics
- Authoring and publishing accessible design themed and other fair housing related materials

- Formation of a program or activities for a Center/Institute for Accessible and Affordable Housing(This can't include construction of any kind.)
- Provide technical assistance to various housing market participants
- Interdisciplinary approaches to accessible housing strategy development, for example, projects that leverage law school, medical school, architecture school, real estate and engineering programs for fair, accessible and affordable housing
- Coordinate efforts with the Innovative Housing Showcase, the National Media campaign, and/or the annual national fair housing month
- Form a consortium with other universities in furtherance of the goal of fair, accessible, affordable housing in the United States

Grantees must coordinate activities with other fair housing organizations, including FHIPs and FHAPs where appropriate.

Grantees must refer potential violations identified to HUD or substantially equivalent state, local or other government agencies for further enforcement actions. Applicants must describe a referral process that will result in referral of fair housing complaints to HUD or substantially equivalent state, local or other government agencies. If funded, the grantee will have to develop and implement the complaint referral process referenced in the application.

Grantees should describe how the project would be integrated into the local and regional housing market, including through outreach to multiple housing stakeholder groups, such as large and small landlords, developers, and first time homebuyers.

iii. Enforcement Capacity Focused Component(s):

These components of the FHOI award provide funding for fair housing organizations that have the overall purpose of improving organizational capacity and expertise to provided for fair housing enforcement.

Specific eligible activities vary between Enforcement components.

• **FHOI – National Testing Partnership Development (FHOI-NTPD)**

FHOI -NTPD Supports projects that expand the Nation's capacity to conduct reliable, legally supportable fair housing testing through development of organizational expertise, standardized practices, recruitment and training of qualified testers, and sustainable testing partnerships. The FHOI – NTPD is not limited to producing testing protocols, but is designed to recruit organizations with technical, analytical and investigative expertise into the national fair housing testing infrastructure. FHOI-NTPD proposals should emphasize the development of investigative capability. Applicants should emphasize long-term testing capability rather than solely the completion of individual testing activities.

The National Testing Partnership Development component is intended to expand the Nation's long-term capacity to detect and address discriminatory housing practices by developing new institutional expertise in fair housing testing. This component seeks to recruit and support nonprofit organizations, universities, technical institutions, and other eligible entities possessing demonstrated investigative, analytical, scientific, technological, or methodological expertise that can be adapted to fair housing testing.

Rather than supporting routine testing activities, this initiative emphasizes the creation of new sustainable organizational capabilities through the development of testing programs, technical assistance, interdisciplinary partnerships, innovative methodologies, quality assurance systems, technology platforms, and specialized training. Successful applicants will contribute to the long-term expansion, diversification, and modernization of the national fair housing testing infrastructure.

Eligible Activities under the FHOI-NTPD might include the following activities that are consistent with a national testing initiative, developed in coordination with FHEO:

Eligible activities include:

- Develop enforcement strategies to identify potential violations of the Fair Housing Act through targeted enforcement efforts; and/or
- Develop education and outreach related capacity to support fair housing enforcement and the goals of the program.

Eligible fair housing activities for proposed projects as outlined in the Fair Housing Act include:

- intake of allegations of housing discrimination;
- referrals of allegations of housing discrimination; and/or
- investigation of allegations of housing discrimination with activities such as complaint-based and audit-based fair housing testing, interviews and evidence gathering; training of testers, test coordination, and evaluation of testing results to uncover evidence of housing discrimination; and other investigative methods designed to uncover housing discrimination.

FHOI-NTPD provides funding to carry out special projects, including the development of prototypes to respond to new or sophisticated forms of discrimination. This FHOI-NTPD NOFO includes two special focus areas for enforcement activities:

- a. **State and Local Housing Discrimination Focus Area.** Develop enforcement strategies to respond to government-sanctioned housing discrimination that violates the Fair Housing Act. See *also* 42 USC §3615. Identify potential violations of the Fair Housing Act by state or local jurisdictions and public housing agencies (PHAs) receiving federal funds for housing and urban development that maintain programs that in any way consider a protected characteristic except where explicitly required or authorized by federal law. For example, actions taken under the pretext of asserted furtherance of preventing displacement and/or increasing housing choice. You must describe a referral process that will result in referral of any fair housing complaints to HUD.
- b. **Religious Liberty Protection Focus Area.** Develop enforcement strategies to respond to religious discrimination. The award may include education and outreach related activities that support fair housing enforcement and the goals of the program, for example that inform the public that religion is a protected characteristic, and the Fair Housing Act bars discrimination based on religion. You must describe a referral process that will result in referral of any fair housing complaints to HUD.

Grantees must coordinate activities with other fair housing organizations, including FHIPs and FHAPs where appropriate.

Grantees must refer potential violations to HUD or substantially equivalent state, local or other government agencies for further enforcement actions. Applicants must describe a referral process that will result in referral of fair housing complaints to HUD or substantially equivalent state, local or other government agencies. If funded, the grantee will have to develop and implement the complaint referral process referenced in the application.

- **FHOI – National Intake Services Partnership (FHOI-NISP)**

The National Intake Services Partnership component supports projects that strengthen coordinated intake, referral, case-routing, and related organizational systems that improve public access to fair housing services.

Applicants should demonstrate how proposed projects will create durable improvements in organizational coordination and public access.

- The FHOI – NISP component is intended to strengthen coordination capacity, enforcement networks, and organizational integration.

Eligible Activities under the FHOI-NISP include the following activities that are consistent with a national intake support initiative, developed in coordination with FHEO that have the overall purpose of improving organizational capacity:

- enforcement activities to identify and remedy potential violations of the Fair Housing Act; and /or
- education and outreach related activities that support fair housing enforcement and the goals of the program.

Eligible fair housing activities for proposed projects as outlined in the Fair Housing Act include:

- intake of allegations of housing discrimination; and
- referrals of allegations of housing discrimination.

Grantees must coordinate activities with other fair housing organizations, including FHIPs and FHAPs where appropriate.

Grantees must refer potential violations to HUD or substantially equivalent state, local or other government agencies for further enforcement actions. Applicants must describe a referral process that will result in referral of fair housing complaints to HUD or substantially equivalent state, local or other government agencies. If funded, the grantee will have to develop and implement the complaint referral process referenced in the application.

- **FHOI – National Litigation Support Partnership (FHOI-NLSP)**

The National Litigation Support Partnership component supports projects that expand the Nation's institutional capacity to provide high-quality fair housing services through development of specialized legal expertise, strategic partnerships, litigation support systems, and coordinated access to experienced fair housing counsel. Projects should strengthen long-term litigation capability rather than solely support individual cases.

The objective of FHOI-NLSP is developing fair housing litigation capacity within organizations possessing adjacent civil-rights expertise. This component is not intended simply to fund routine litigation.

Eligible Activities under the FHOI-NLSP may include the following activities that are consistent with a national litigation support initiative, developed in coordination with FHEO that have the overall purpose of improving, building or increasing organizational capacity:

- for enforcement activities to identify and remedy potential violations of the Fair Housing Act; and
- to conduct education and outreach related activities that support fair housing enforcement and the goals of the program.

Eligible fair housing activities for proposed projects as outlined in the Fair Housing Act might include:

- intake of allegations of housing discrimination;
- referrals of allegations of housing discrimination;
- investigation of allegations of housing discrimination with activities such as complaint-based and audit-based fair housing testing, interviews and evidence gathering; training of testers, test coordination, and evaluation of testing results to uncover evidence of housing discrimination; and other investigative methods designed to uncover housing discrimination;
- mediation or other voluntary resolution of allegations of housing discrimination; and/or
- enforcement of meritorious claims, including litigation and procuring expert witnesses.

The FHOI-NLSP includes two special focus areas for enforcement activities:

- c. **State and Local Housing Discrimination Focus Area.** Develop legal strategies to respond to government-sanctioned housing discrimination that violates the Fair Housing Act. See *also* 42 USC §3615. Identify potential violations of the Fair Housing Act by state or local jurisdictions and public housing agencies (PHAs) receiving federal funds for housing and urban development that maintain programs that in any way consider a protected characteristic except where explicitly required or authorized by federal law. For example, actions taken under the pretext of asserted furtherance of preventing displacement and/or increasing housing choice. You must describe a referral process that will result in referral of any fair housing complaints to HUD.
- d. **Religious Liberty Protection Focus Area.** Develop legal strategies to respond to religious discrimination. The award may include education and outreach related activities that support fair housing enforcement and the goals of the program, for example that inform the public that religion is a protected characteristic, and the Fair Housing Act bars discrimination based on religion. You must describe a referral process that will result in referral of any fair housing complaints to HUD.

Grantees must coordinate activities with other fair housing organizations, including FHIPs and FHAPs where appropriate.

Grantees must refer potential violations to HUD or substantially equivalent state, local or other government agencies for further enforcement actions. Applicants must describe a referral process that will result in referral of fair housing complaints to HUD or substantially equivalent state, local or other government agencies. If funded, the grantee will have to develop and implement the complaint referral process referenced in the application.

G. Other Information

1. Other Requirements

a. **Retainer Fees.** To be eligible for reimbursement under this grant program, FHIP recipients must comply with all requirements of the grant agreement with respect to retention of counsel and reporting of information along with the retainer and legal fee restrictions provided above.

b. Training Funds

i. FHIP Funds may be utilized for training, as specified in the SOW and up to the amounts provided within this NOFO, for participation in HUD-sponsored or HUD-approved training. Approval must be obtained prior to expenditure of funds.

ii. Your proposed budget must set aside exactly \$7,500 annually to participate in HUD-sponsored or HUD-approved training. In addition, the \$7,500 in annual training funds must either be expended, or the grantee must have a clearly established plan to expend the funds, but the end of the third quarter of the grant period of performance. HUD reserves the right to require the return of any training funds not expended or subject to a clearly established plan for expenditure by the third quarter of the grant period of performance.

iii. If you are awarded more than one FHIP grant (under more than one initiative and/or component), HUD will 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. Failure to use the funds for training and/or fair housing activities will result in the grantee returning the funds to HUD.

iv. If you receive more than two FY2026 awards, you cannot set aside more than \$15,000 per year during the grant period of performance/per annum for training purposes. HUD will reduce any training budget of more than \$15,000 per annum for a single grantee with multiple awards during negotiations, and the excess funds will be transferred back to fair housing activities.

c. Criminal Background and Integrity. The following requirements apply to all activities funded under this FHIP NOFO:

i. HUD will enforce all provisions of this NOFO that relate to the proper conduct of activities and protections regarding fraud, waste and abuse. Principals and employees of applicants, especially those who manage the funds awarded hereunder, must not have prior felony convictions or convictions of crimes involving fraud or perjury.

ii. Organizations conducting investigations and/or enforcement activities, and the employees and agents of these organizations may not:

(1) Have an economic interest in the outcome of an investigation, without prejudice to the right of any person or entity to recover damages for any cognizable injury;

(2) Be a relative of any party in a case;

(3) Have had any employment or other affiliation, within one year, with the person or organization being investigated; or

(4) Be a licensed competitor of a respondent organization being investigated for the listing, rental, sale, or financing of real estate.

d. Code of Conduct. Both you as the award recipient, and all subrecipients, must have a code of conduct (or written standards of conduct). The code of conduct must comply with the requirements included in the "Conducting Business in Accordance with Ethical Standards", as well as any program-specific requirements. These requirements include ethical standards related to conflicts of interest for procurements in 2 CFR 200.318(c) and 2 CFR 200.317, as well as HUD-specific conflict of interest standards. HUD maintains a list of organizations that have previously submitted written standards of conduct on its Code of Conduct for HUD Grant Programs webpage. It is your responsibility to ensure that the standards are compliant with the noted requirements **and** that HUD has the latest version of your written standards. Updated written standards should be submitted with the application. Any updates to your written standards, after the application period, should be submitted as directed by the HUD program contact for this NOFO.

IV. APPLICATION CONTENTS AND FORMAT

IV. Application Contents and Forms

A. Standard Forms, Assurances, and Certifications

B. Budget

C. Narratives and Other Attachments

D. Other Application Content

TABLE OF CONTENTS

IV. APPLICATION CONTENTS AND FORMAT

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

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

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

Do not submit password protected or encrypted files.

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

You may submit a maximum of 10 pages, double-spaced 12-point Times New Roman font on letter sized paper (8 1/2 x 11 inches) with at least 1-inch margins on all sides, for each Rating Factor 1, 2 and 4, excluding the charts permitted to be submitted as part of your response to Rating Factor 1, which do not count toward the 10 page per Rating Factor limit. FHEO will not review pages submitted in excess of the permitted Rating Factor page limits, including if single spaced pages are submitted [in that case FHEO will stop reading after the equivalent of the double-spaced page limit has been reached].

There are no page limits for Rating Factor 3.

Ensure that your responses for each Rating Factor are listed under the appropriate heading; you will not receive credit for your submission under an incorrect Rating Factor.

A. Standard Forms, Assurances, and Certifications

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

Forms/Assurances/Certifications	Submission Requirement	Notes/Description
Application for Federal Assistance (SF-424)	Required with the application	Page limit: Not applicable File name: SF-424

Forms/Assurances/ Certifications	Submission Requirement	Notes/Description
Applicant and Recipient Assurances and Certifications (HUD 424-B)	Required with the application	Page limit: Not applicable File name: HUD-424B
Applicant/Recipient Disclosure/Update Report (HUD 2880)	Required with the application	Page limit: Not applicable File name: HUD-2880
Certification Regarding Lobbying	Required with the application (except Federally-recognized tribes and their TDHEs)	Page limit: Not applicable File name: Lobbying Certification form
Disclosure of Lobbying Activities (SF-LLL)	Required with the application	Page limit: Not applicable File name: SF-LLL
Certification for a Drug-Free Workplace (HUD-50070)	Required with the application	Page limit: Not applicable File name: HUD-50070
Assurances for Non-Construction Programs (SF-424B)	If applicable, required with the application	Page limit: Not applicable File name: SF-424B
Certification of Consistency with the Consolidated Plan (HUD-2991)	Required with the application	Page limit: Not applicable File name: HUD-2991

B. Budget

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

Your budget must indicate all direct and any indirect costs. Use Form HUD-424-CBW to prepare your budget.

Please ensure that you review *Other requirements* (III.G.) and *Unallowable Costs* (III.D.) in preparing your budget.

You **must** submit a separate budget for each separate consecutive 12-month performance and budget period of your proposed project, using form HUD-424-CBW. See Section V. Rating Factor 3 for more information on Budget and related requirements.

If applicable, you must also submit Form HUD-426, based on the requirements in Section III. E. of this NOFO.

Budget Form/Document	Submission Requirement	Notes/Description
Grant Application Detailed Budget Worksheet (HUD-424-CBW)	Required with the application	Page limit: Not applicable File name: HUD-424CBW Form location: download instructions
Indirect Cost Information for Applicant/Recipient (HUD-426)	If applicable, this document is required with the application and after award	Page limit: Not applicable File name: ICR Doc. See Section III.E. Form location: download instructions
Federal Assistance Funding Matrix and Certifications (HUD-424-M)	Required with the application	Page limit: Not applicable File name: HUD-424M Form location: download instructions

C. Narratives and Other Attachments

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

Document	Submission Requirement	Notes/Description
Response to Rating Factors	Required with the application	See Section V.B File name:
HBCU Preference Points – Documentation	If applicable, this document is required with the application	Page limit: Not applicable File name: HBCU Doc
Nonprofit Status – Documentation	If applicable, this document is required with the application	Page limit: Not applicable File Name: Code Acceptable Content
Code of Conduct	If not included in HUD's eLibrary , this document is required with the application	Page limit: Not applicable File name: Code

Document	Submission Requirement	Notes/Description
		Acceptable Content

D. Other Application Content

Successful nonprofit applicants must provide current valid proof of not for profit status. All applicants must complete all statement of work tasks agreed upon in negotiations.

If your application is selected for an award, you will be required to negotiate a grant agreement to include a final SOW and budget based upon the project proposed in your application, prior to the issuance of a formal award.

1. Technical Application Errors

HUD will contact you to fix a technical error with your timely application after the due date. Technical errors, if corrected, do not affect (positive or negative) your merit rating under this NOFO. Examples of technical errors include, but are not limited to: inconsistencies in funding requests; a missing or incomplete form or certification; failure to submit an otherwise sufficient application under the correct Assistance Listings number or Funding Opportunity Number in Grants.gov; improper signature on a form or certification; and missing or inappropriate eligibility documentation.

HUD will send notice to the [authorized organization representative](#) to fix a technical error. You must respond timely and appropriately to HUD's notice (see [submission requirements](#)).

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

Corrections to Deficient Applications. In order not to unreasonably exclude applications from being rated and ranked, HUD may contact applicants to ensure proper completion of the application and will do so uniformly for all applicants. HUD will not permit or seek clarification of items or responses that improve the substantive quality of an applicant's response to any rating factors, may affect an applicant's score, or correct deficiencies which are in whole or part of a rating factor. Applicants will have no more than 3 business days from the date of notification to submit the required documents to HUD via email. Applicants will be notified by email about corrections to ensure notification. The applicants must submit the corrections by using the form HUD Form 90611 found in their downloaded application to submit the technical cures to HUD. HUD may permit minor adjustments to be made to award amounts to correct minor inconsistencies. However, applications that consistently request funding outside of the maximum or minimum award limits will be deemed ineligible and will not be reviewed.

You will not be permitted to make any correction or additional submission that may affect or has the potential to affect the merit rating under this NOFO.

V. APPLICATION REVIEW INFORMATION

V. Application Review Information

A. Threshold Review

B. Merit Review

C. Risk Review

D. Selection Process

E. Award Notices

V. APPLICATION REVIEW INFORMATION

A. Threshold Review

When you apply: Your application is reviewed to make sure it meets the threshold requirements of this NOFO. If your application has a [technical error](#), HUD will allow you to [correct it](#). If you fail to meet **any** of the threshold requirements, your application is **not** eligible for HUD funding. If you do meet the threshold requirements, your application moves to [Merit Review](#) (the next step).

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

1. Timely Application Submission

Late applications are not evaluated and not eligible for funding. See deadlines in [Section VI](#).

2. Complete Application

If your application is timely, HUD will confirm completeness. Your application is considered for funding if it is complete and responsive to the requirements in this NOFO. If your application is incomplete, HUD will ask you to fix any [technical errors](#). Otherwise, incomplete and nonresponsive applications are not considered for funding.

As required under 42 USC 3616a(f)(3) and 24 CFR 125.105, each application for funding under the FHIP must contain the following information, which will be assessed against the specific selection criteria set forth in this Notice of Funding Opportunity:

- (a) A description of the practice (or practices) that has affected adversely the achievement of the goal of fair housing, and that will be addressed by the applicant's proposed activities.
- (b) A description of the specific activities proposed to be conducted with FHIP funds including the final product(s) and/or any reports to be produced; the cost of each activity proposed; and a schedule for completion of the proposed activities.
- (c) A description of the applicant's experience in formulating or carrying out programs to prevent or eliminate discriminatory housing practices.
- (d) An estimate of public or private resources that may be available to assist the proposed activities.
- (e) A description of the procedures to be used for monitoring conduct and assessing results of the proposed activities.
- (f) A description of the benefits that successful completion of the project will produce to enhance fair housing, and the indicators by which these benefits are to be measured.
- (g) A description of the expected long term viability of project results.
- (h) Any additional information required by the Notice of Funding Opportunity.

Rating factors include citations to these regulatory sections, so the applicant can specify how

they are meeting the required criteria in the appropriate Rating Factor response.

Having made a determination of good cause, the Assistant Secretary for Fair Housing and Equal Opportunity waives, by publication of this NOFO, any requirement of 24 CFR 125 that is inconsistent with this NOFO and that is not otherwise required by statute (24 CFR 125.106). This includes, for example, any conflicting provisions within: 24 CFR §125.107; and 24 CFR § 125.501.

3. Eligible Applicant

Upon receipt, HUD will confirm whether you are an [eligible applicant](#). Applications from ineligible applicants do not proceed to [merit review](#) and are not eligible for HUD funding.

4. Resolution of Civil Rights Matters

Outstanding civil rights matters must be resolved before the application submission deadline. Applicants with unresolved civil rights matters at the application deadline are deemed ineligible. Applications from ineligible applicants are not rated or ranked and will not receive HUD funding.

B. Merit Review

If your application meets the threshold requirements, a panel will review and score its merits. The panel may include HUD employees and non-employees. They will evaluate your application based on the following criteria. The results of the evaluation are shared with senior HUD officials who make the [final decisions about funding](#) consistent with this NOFO.

Merit Review Summary

Criterion	Total number of points = 100, up to 107
Rating Factor 1	20 points
Rating Factor 2	50 points
Rating Factor 3	20 points
Rating Factor 4	10 points
Policy Initiative Preference Points	7 points
Total	107 points

Use headings to correspond to each Rating Factor to clearly identify your response. Information that you wish to be scored should be under the appropriate Rating Factor. We score each Rating Factor independently, so please follow the organization of these Rating Factors.

Applicants must provide responses to all four Rating Factors below or the application will be deemed ineligible and will not be reviewed. The maximum number of Rating Factor points awarded under this NOFO is 100. In addition, applicants may receive a maximum of 7 Preference Points if the criteria are met, for a total of 107 possible NOFO points.

Carefully read this NOFO for instructions on how to develop your Narrative Response to these Rating Factors. Each Rating Factor prompt describes the criteria we will use to evaluate your response to that Rating Factor and Sub-Factor.

Reviewers will also consider whether your responses are complete, clearly articulated, and well-supported.

The recommendations herein remain advisory and are not ministerially ratified, routinely

deferred to, or otherwise treated as *de facto* binding by the Assistant Secretary for Fair Housing and Equal Opportunity. This NOFO should not be construed to create any rights to any particular level of review or consideration for any funding applicant except as required by applicable law.

HUD may consider geographic distribution, diverse types and sizes of applicant entities, unique methods or approaches, or a limitation on the number of awards a single applicant may receive when selecting applicants for funding; and may target geographic areas based on changing population and demographics.

HUD will evaluate applications submitted under this NOFO based upon their demonstrated ability to advance the purposes of the Fair Housing Organizations Initiative and produce durable improvements in organizational capability that strengthen the Nation's private fair housing infrastructure.

The Department seeks to support projects that are strategically designed, organizationally sound, financially responsible, and capable of producing meaningful and sustainable improvements that continue beyond the period of Federal financial assistance.

Reviewers will evaluate each application based upon the published rating factors, component-specific requirements, and the extent to which the proposed project advances the objectives of the selected funding component.

1. Rating Factors

Your application must include a response to the following criteria.

Rating Factors Details

Criterion	Max points = 100
Ant and Relevant Organizational Experience	20 max points
e – 10 points city – 10 points	
ent of the Problem	50 max points
lution (Program Objectives, Effectiveness of Plan and Alignment to Needs) - 10 points oints oints oints oints	
roach	20 max points
Narrative – 10 points dget Narrative – 10 points	

and Program Evaluation

10 max points

7 max points

estate industry organizations (1)

technical assistance to support compliance with accessibility

Preference Points (4)

Rating Factor 1 Capacity of Applicant and Relevant Organizational Experience**20 max points**

Address the extent to which your organization has the staff experience and organizational capacity necessary to successfully complete the proposed project. (See 24 CFR 125.105(c))

Applicants should demonstrate that they possess, or will develop through the proposed project, the organizational capability necessary to accomplish the objectives of the specific funding component.

Applicants proposing collaborative partnerships should demonstrate that each participating organization contributes expertise that materially advances the objectives of the proposed project.

Diversified Funding Sources: Applicants are encouraged to secure the use of other resources to supplement the HUD award. (See 24 CFR 125.105(d)) Applicants that can demonstrate diversified funding resources will receive higher scores in this factor.

You must include the following elements within your narrative response:

- **Description of Staff and Staff Expertise (10 points): Experience of individual(s) who will work on the grant that will contribute to the success of the proposed project.**
 - Describe each key staff member's fair housing-related experience relevant to the proposed project and explain how the staff member's experience will expressly contribute to the success of the project.
 - You must have more than two current key staff members with experience formulating or carrying out programs to prevent or eliminate discriminatory housing practices on board at the time the application is submitted (be specific when describing experience).
 - Identify key project staff by name and position and estimated percentage of time each will dedicate to the project. Include total percentage of staff time devoted to the project over the entire period of performance (POP) which

cannot exceed 100% across all duties (including for current grants and other FHIP applications). Project Manager must be a current employee and dedicate no less than 25% of time over the entire POP. Key Staff information may be provided in a graph or chart that will not count toward the Rating Factor 1 page limit.

- Organizational Experience and Capacity (10 points)

Applicants must demonstrate that they possess the organizational experience, institutional capability, and operational capacity necessary to successfully implement the proposed cooperative agreement and achieve the objectives of the Fair Housing Organizations Initiative.

Applicants should clearly demonstrate that the organization:

- Possesses requisite Organizational Fair Housing Experience. Applicants should describe the organization's demonstrated experience advancing fair housing enforcement and organizational capacity during the preceding three years. Information may be presented in narrative, and/or tabular or graphic format, or in chart form and will not count toward the page limitation for Rating Factor 1.
- Maintains an effective governance and management structure capable of administering Federal financial assistance in accordance with applicable statutes, regulations, and award requirements;
 - possesses sufficient organizational capacity, including qualified leadership, professional staff, consultants, and subrecipients, as appropriate, to successfully implement the proposed organizational development activities throughout the period of performance;
 - has established systems for financial management, project oversight, internal controls, performance monitoring, and quality assurance sufficient to administer the proposed cooperative agreement;
 - has successfully completed projects or organizational initiatives comparable in scope, complexity, or institutional significance to those proposed under this NOFO, or has demonstrated experience that is readily transferable to the proposed activities; and
 - has established appropriate procedures for supervising, monitoring, and evaluating the performance of consultants, contractors, and subrecipients, where applicable.
 - Applicants should describe how prior organizational accomplishments have strengthened institutional capability, improved operational effectiveness, expanded fair housing capacity, or otherwise contributed to sustainable organizational development

Applicants should describe, as applicable:

- fair housing complaints received, investigated, and resolved, categorized by

protected basis and issue;

- referrals made to HUD or other appropriate enforcement agencies;
 - testing activities conducted, including the types of testing performed and their relationship to enforcement objectives;
 - investigative activities beyond testing, including systemic investigations, accessibility reviews, or other enforcement initiatives;
 - significant administrative or judicial outcomes, including settlements, findings, corrective actions, monetary and non-monetary relief obtained, and other measurable enforcement results; and
 - organizational activities that strengthened fair housing enforcement capacity, developed institutional partnerships, expanded organizational expertise, improved operational capability, or otherwise advanced the organization's ability to carry out the purposes of the Fair Housing Act.
- If applying as a public or private entity that is formulating or carrying out programs to prevent or eliminate discriminatory housing practices, describe relevant organizational experience in formulating or carrying out such programs.
 - Partnerships: Many fair housing challenges require expertise from multiple disciplines. Accordingly, HUD encourages applicants to establish partnerships that combine complementary capabilities in support of the objectives of the selected funding component. Partnerships may include, as appropriate:
 - fair housing organizations;
 - legal services providers;
 - civil rights organizations;
 - disability rights organizations;
 - institutions of higher education;
 - community-based nonprofit organizations;
 - professional associations;
 - organizations with specialized technical expertise; and
 - other entities whose participation materially strengthens the proposed project.

Applicants should clearly describe:

- the role of each partner;
- the expertise contributed by each partner;
- governance and decision-making arrangements;
- plans for coordination; and
- how the partnership will strengthen organizational capability beyond the period of Federal

financial assistance.

Rating Factor 2 Need/Distress/Extent of the Problem

50 max points (breakdown shown below)

You must include the following elements within your narrative response (See 24 CFR 125.105(a) and (b)):

- **Problem Statement and Proposed Solution - 10 points**
- **Narrative Element 1 – 10 points**
- **Narrative Element 2 - 10 points**
- **Narrative Element 3 – 10 points**
- **Narrative Element 4 – 10 points**

Program Objectives

- You must clearly demonstrate that the proposal advances the policy priorities of the Department, and the goals and objectives of the program.

Effectiveness of Plan

- Describe the applicant's plan to address the fair housing need identified.
- Explain why this intervention will be effective.

Alignment of Needs and Proposed Capacity Building Activities

Applicants must clearly demonstrate how the proposed cooperative agreement will strengthen the organization's long-term capacity to advance fair housing enforcement consistent with the purposes of the Fair Housing Organizations Initiative.

Applicants should explain:

- the organizational or institutional needs that the proposed activities are intended to address;
- how the proposed activities will strengthen the organization's ability to investigate, identify, prevent, or remedy discriminatory housing practices;
- how the proposed activities will expand organizational capability, technical expertise, geographic service capacity, or specialized enforcement capacity in areas where additional fair housing infrastructure is needed;
- how the proposed activities complement, rather than duplicate, existing fair housing resources available through FHIP, FHAP, or other public or private organizations; and

how the proposed organizational improvements will produce sustainable institutional benefits that continue beyond the period of Federal assistance.

This NOFO prohibits the use of federal funds to be used for any type of illegal preferences or otherwise discriminate based on race, sex or other protected status.

Applicants may wish to emphasize how their proposal would contribute to: institutional

development, infrastructure contribution, sustainability, collaboration, and long-term capacity creation. Project outputs should be distinguished from long-term institutional outcomes. Applicants should emphasize the enduring capacity that will remain after the federal investment ends.

Applicants should demonstrate: a clear understanding of the organizational challenge or opportunity; consistency with the purposes of the selected funding component; relationship of the project to the Fair Housing Organizations Initiative; anticipated contribution to fair housing capability.

The narrative should present a comprehensive description of the proposed project and demonstrate how the proposed activities will advance the objectives of the selected funding component.

The Narrative should address:

- the organizational challenge or opportunity addressed by the proposed project;
- the relationship of that challenge to the objectives of the selected funding component;
- why Federal assistance is necessary to accomplish the proposed project.

Design - Describe:

- proposed activities;
- implementation strategy;
- project management approach;
- staffing plan;
- timeline;
- major milestones.

Results - Applicants should identify the principal organizational improvements expected to result from the project.

Examples include:

- expanded organizational expertise;
- improved operational systems;
- enhanced technical capability;
- strengthened partnerships;
- increased organizational effectiveness;
- improved service delivery;
- expanded fair housing capability.

Sustainability - Applicants should explain how the organizational improvements developed through the project will continue after the period of Federal financial assistance concludes.

Discussion may include:

- institutional policies;
- staffing plans;
- partnerships;
- technology;
- governance;
- financial sustainability;
- operational integrity

Applicants should explain how proposed activities contribute to sustainable improvements in organizational capability.

Required Narrative Element 1:

Executive Order (EO) 14332, titled "Improving Oversight of Federal Grantmaking," is a directive issued by the White House on August 7, 2025 that requires federal discretionary grants to focus on performance-based investments that align explicitly with the Administration's policy priorities. It prohibits the use of funds to promote or subsidize immigration, illegal racial preferences or discrimination, or initiatives that promote gender ideology. It also encourages agencies to engage a broader range of recipients. HUD has made it clear that it is committed to the purpose of the Fourteenth Amendment to the U.S. Constitution which is to "do away with all governmentally imposed discrimination based on race. Eliminating racial discrimination means eliminating all of it." *Students for Fair Admissions, Inc. v. President & Fellows of Harvard College*, 600 U.S. 181, 206 (2023). To that end the activities promoted by this NOFO and the funds used under this NOFO cannot be used for any type of illegal racial preferences. In addition, HUD is committed to restoring equal access and the protection of faith-based activities for faith-based organizations that operate consistent with their sincerely held religious beliefs, recognizing all relevant protections provided by subsection C of HUD's Equal Participation Rule, 24 C.F. R. 5.109, the Religious Freedom Restoration Act, and the First Amendment.

Please describe how this grant if funded will contribute to the advancement of at least one of the priorities discussed above.

Required Narrative Element 2:

Under the current administration, federal fair housing enforcement is guided by three core principles:

- Restore fair housing enforcement to its core statutory objectives;
- Recognize that all Americans have civil rights and liberties that must be protected; and
- Enforce the Fair Housing Act within constitutional limitations.

Please describe how your application, if funded, would advance these principles.

Required Narrative Element 3:

You must clearly identify and describe the fair housing needs to be addressed, and the direct

relationship between your proposed project and how, through your proposed project, your organization plans to address housing discrimination in a way that meets those fair housing needs. Provide any available reference material that supports this rationale, including data, studies, reports, or other evidence.

Describe how the proposed tasks and activities are aligned with the specific fair housing needs identified for the targeted area, and how the proposed activities foster and maintain compliance with civil rights and fair housing, including but not limited to addressing documented evidence of discrimination prohibited by the Fair Housing Act within the project area; and how you will use award funds to provide services in an area with unmet fair housing needs and/or expand fair housing services to areas not currently served by a fair housing organization. To support and demonstrate your ability to meet this policy initiative preference category, you may refer to your alignment with the jurisdiction's Consolidated Plan and/or how your organization's project aligns with fair housing planning documents for the target area.

Required Narrative Element 4:

Within the past 7 months, HUD opened various Secretary-initiated investigations (SII) to combat "new or sophisticated forms of housing discrimination." 42 U.S.C. 3613a(b)(2). A full list of ongoing Secretary-initiated investigations can be found here:

<https://www.hud.gov/hudclips/notices#theo>.

Identify the investigation closest to your proposed project area and discuss whether the investigation aligns with your range of investigative and enforcement activities.

Rating Factor 3 Soundness of Approach

20 max points

This factor is based on the: (1) Proposed Statement of Work (SOW) and Information Requirements; and (2) Budget and Cost Estimates.

Your work plan must follow *all* NOFO requirements.

You must include the following elements within your narrative response (See 24 CFR 125.105(b) and (d)):

- **Proposed SOW and Information Requirements:** Activities proposed to be conducted with a schedule for completion.
- **Budget and Cost Estimates:** The cost of each activity proposed.

The SOW Narrative should

- Identify
- measurable organizational goals and explain how those goals address the needs identified under Rating Factor 2;
- describe the proposed activities, major tasks, deliverables, milestones, and anticipated organizational outcomes;
- explain how the proposed activities will improve the organization's long-term effectiveness, operational capability, management systems, technological capacity,

workforce development, collaborative partnerships, or other institutional functions;

- describe any planned expansion into underserved geographic areas, emerging areas of fair housing enforcement, or specialized fields of expertise;
- explain how existing organizational activities will be strengthened, modernized, or institutionalized through the proposed cooperative agreement; and
- demonstrate how the proposed activities collectively contribute to developing and sustaining the Nation's private fair housing infrastructure.
- The Statement of Work and accompanying budget should clearly identify all major organizational development activities, anticipated expenditures, and measurable institutional outcomes necessary to accomplish the objectives of the proposed cooperative agreement.

Applicants should provide a comprehensive Statement of Work describing the organizational improvements, institutional capacity-building activities, and operational enhancements that will be accomplished during the project period.

Include a description of your fair housing complaint referral process that will be activated/utilized throughout the proposed project, a description of the continuation of existing activities and/or the expansion or creation of fair housing enforcement activities, including into new service areas as applicable.

Statement of Work (SOW) Chart (use Appendix A as an example)

Submit a separate complete SOW Chart for each consecutive 12-month period of performance of the 24-month project, and incorporate and describe all specific tasks and activities necessary for the proposed project. Add/edit Administrative and Program Tasks and add/edit tasks in Appendix A as necessary and appropriate for the proposed project. Your proposed activities and deliverables must be clear and measurable and directly related to the line items and overall expenditures in the proposed Budget.

The SOW program tasks must include all proposed activities and major tasks and the budget must specifically set forth all expenditures necessary to implement these activities.

Budget Narrative

Your budget Narrative must

- identify key team members/staff and partners/subrecipients, consistent with the list provided in Rating Factor 1, who will be responsible for completing major tasks, and the costs associated with those individuals for the tasks described.
- clearly describe the organization's Financial Management Capacity and its Board's role in financial management and oversight of the organization.
- describe the organization's processes for and capabilities in handling financial resources, disseminating payments to third parties (e.g. contractors), and maintaining adequate accounting and internal control procedures to appropriately expend and accurately track expenditures of federal grant funds. HUD will not award or disburse funds to applicants not having a financial management system meeting

Federal standards as described in 2 CFR 200.302.

- if applicable, include a list or chart of current and/or prior FHIP grants received since FY2022 (grant number, dollar amount awarded, amount expended and obligated as of 30 days prior to the date the application is submitted; and a description of the activities and results achieved). If you do not have any past or current FHIP grants to report you may state that and you may include a statement instead if you wish to apply for New Applicant Policy Initiative Preference Points.

Grant Application Detailed Budget Worksheet (HUD-424-CBW)

You must submit a HUD-424-CBW for each consecutive 12-month period of the project that

- presents a clear, thorough and complete budget.
- Includes budget line items which all directly correspond to the tasks and activities in the SOW.
- clearly list all direct and indirect costs (if any) associated with project implementation and completion.
- includes the mandatory \$7,500 per project year for HUD sponsored or approved training, in Other Direct Costs in the budget.
- You must also submit a separate HUD-424-CBW for each subrecipient or contractor whose budget amount equals or exceeds \$10,000.

Reminder: You must submit a separate SOW Chart and HUD 424-CBW Budget for each consecutive 12-month performance and budget period of the proposed project, or your application will be deemed ineligible and will not be reviewed.

Rating Factor 4 Achieving Results and Program Evaluation

10 max points

Considering your responses to Rating Factors 1 through 3, HUD will assess your plan to evaluate your achievement of proposed goals and the extent to which your organization evaluates and measures results and holds itself accountable to ensure effective program management.

Your application must clearly outline the organization's strategy for measuring, evaluating and improving (if necessary) its program performance against proposed activity goals during the grant period of performance.

All applications must include clear benchmarks for measuring success and progress towards relevant goals.

Include the following elements within your narrative response (See 24 CFR 125.105(e)-(g)):

1. Measurement

Describe and explain the strategies in place and that will be used to gather valid quantifiable data and measure outputs and outcomes for the program activities and goals outlined in the Statement of Work. Identify outcomes that reflect the anticipated effect your organization's proposed activities will have on its beneficiaries. Explain

how the data gathered will be validated.

2. Evaluation Plan

Propose a plan to effectively evaluate progress toward stated objectives and goals. Explain how the organization will evaluate long-term outcomes of the proposed project work in your target service area.

Applicants should explain how proposed activities contribute to sustainable improvements in organizational capability.

Applicants should identify the principal organizational improvements expected to result from the project.

Applicants should explain how the organizational improvements developed through the project will continue after the period of Federal financial assistance concludes.

2. Policy Initiative Preference Points

Preference points are added to your overall application score. You do not need to address the policy initiatives in this section to receive an award. If you choose to address a policy initiative in your application, you must adhere to the information with any award.

a. Historically Black Colleges and Universities (HBCUs)

You may receive one (1) point, if you are an [HBCU](#). To receive the point, you must include in your application documentation of your [HBCU](#) designation.

OR

You may receive one (1) point, if you are partnering with an [HBCU](#). To receive the point, you must include in your application a letter of commitment and [HBCU](#) status documentation. The letter must confirm your partnership. The letter must also include the signature of a leadership official at the [HBCU](#).

b. Cooperation with real estate industry organizations

You may receive one (1) point if you demonstrate within your application narratives that you have cooperated and/or are cooperating with, and will cooperate with real estate industry organizations. Include specific information to describe your past and/or current cooperation **and** how you will incorporate your organization's cooperation with real estate organizations into your work plan and tasks and activities.

c. Educational Information and Technical Assistance for Accessibility Requirements

You may receive one (1) point if you demonstrate within your application narratives that you will utilize program funds to disseminate educational information and technical assistance to support compliance with accessibility requirements through your proposed project.

d. Component Specific Preference Points

You may receive up to a maximum of four (4) total points for component specific factors. Applicants may not receive more than a combined total of four (4) points as awarded under this section, regardless of the number of components to which applications are made.

1. FHOI – General Component (FHOI-G): Applicants under this component that are universities with an ABA approved law school that includes a clinical education component that operate legal aid clinics providing legal support to the general public may be awarded a maximum of four (4) preference points.
2. FHOI – Sustainable Partnership for Accessibility (FHOI-SPA): Applicants under this component that are universities with both an ABA approved Law School and an Architecture School may be awarded a maximum of four (4) preference points.
3. FHOI – National Testing Partnership Development (FHOI-NTPD): Applicants under this component that are first time applicants for FHIP funding may receive up to four (4) preference points. To receive four (4) preference points for this factor, you must include a brief statement of eligibility (i.e., identifying that you are a new applicant) and a description of how this grant funding would enable you to build your capacity as a fair housing organization. A first-time applicant must not have received a previous award under this or any other FHIP program. This includes the exclusion of applicants that are a parent organization and its affiliate/subsidiary organization or affiliate and parent organization staff sharing protocols whereby the parent organization shares key staff with an affiliate(s). You may include this statement in place of the list or chart to be submitted as part of the response to Rating Factor 3 by current/ recent FHIP grantees listing their current/ recent grants and outcomes.
4. FHOI – National Intake Support Partnership (FHOI-NISP): Applicants under this component that are first time applicants for FHIP funding may receive up to four (4) preference points. To receive four (4) preference points for this factor, you must include a brief statement of eligibility (i.e., identifying that you are a new applicant) and a description of how this grant funding would enable you to build your capacity as a fair housing organization. This is consistent with the goals outlined above in the goals to increase a broader range of applicants for HUD grants. A first-time applicant must meet the eligibility criteria set forth in Section A. 3. above in this NOFO but cannot have submitted a prior application or received a previous award under this and other FHIP programs. This includes the exclusion of applicants that are a parent organization and its affiliate/subsidiary organization or affiliate and parent organization staff sharing protocols whereby the parent organization shares key staff with an affiliate(s). You may include this statement in place of the list or chart to be submitted as part of the response to Rating Factor 3 by current/ recent FHIP grantees listing their current/ recent grants and outcomes.
5. FHOI – National Litigation Support Partnership (FHOI-NLSP): Applicants under this component that are public interest law firms and universities with legal aid clinics that provide litigation support to the general public may be awarded a maximum of four (4) preference points.

3. Other Factors

Your application must respond to the following additional criteria.

a. Budget

The panel will evaluate but not approve the budget. The panel will assess whether the budget

aligns with planned program activities and objectives. Panel members will consider whether the budget and the requested performance period are fully justified and reasonable in relation to the proposed project.

b. Certification of Consistency with the Consolidated Plan

You must ensure that the activities in your application are [consistent with your local Consolidated Plan](#).

C. Risk Review

Before making any awards, HUD will evaluate each applicant's likelihood of successfully carrying out the project. Here's what HUD looks at:

Past Performance:

- Government-wide performance data, as noted in [2 CFR 200.206\(a\)](#)
- Public sources like news reports, Inspector General findings, Government Accountability Office reports, and complaints proven to have merit
- History of managing Federal awards (if applicable), including on-time reporting, meeting planned goals, and following previous award rules. And, the extent to which any previously awarded amounts will be expended prior to future awards
- Reports from past audits, including those performed under 2 CFR part 200, subpart F—Audit Requirements
- History of finishing activities on time and using any promised matching or leveraged funds

Organizational Health:

- Financial stability
- Quality of management systems and ability to meet the management standards in 2 CFR part 200
- Ability to follow all required laws and rules
- Capacity, including staffing structures and capabilities

Results:

- Ability to promote self-sufficiency and economic independence
- Number of people served or targeted for assistance

Before making any awards, including renewal awards, HUD will evaluate each applicant's likelihood of successfully carrying out the project. This assessment helps identify risks that may affect the advancement toward or the achievement of a project's goals and objectives. (2 CFR 200.206). HUD will also consider debarments and suspensions, misuse of federal funds for purposes outside the program, and performance assessments and/or any performance improvement plans for past funding, including grants, partnership awards and/or cooperative agreements. Your organization must comply with cost principles in 2 CFR Part 200 Subpart E (200.400 et seq) and where applicable, 200 Part 170.

HUD will also consider any history of illegal discrimination, including illegal racial discrimination as well as any unresolved civil rights charges or complaints that arise after the application period.

HUD in its discretion may use the results of the risk review as a sufficient and independent basis to reject an award, apply special conditions on an award, or reduce the amount of an award.

Risk Review and Application Merit Review Points

HUD will consider past performance with the assessment of applicant risk. For current / recent FHIP grantees, the review of past performance will include a consideration of the applicant's most recent FHIP Final Performance Assessment Report (PAR).

Final PARs contain these items: (1) evaluation of the performance of all requirements under the grant; (2) the extent to which goals were met; (3) acceptance of work performed; (4) quality of performance; and (5) the extent to which the budget was adhered to and grant funds were expended for grant related activities during the period of performance.

Up to 11 points may be deducted from the applicant's overall rating score as follows:

- 1 point if the applicant received less than an "Excellent"
- 5 points if the applicant received less than a "Good"
- 5 points if the applicant is deemed "High Risk"

An organization is ineligible for funding if it received a "poor (unsatisfactory)" rating on a performance assessment on any prior FHIP grant within the past five years.

HUD may use the results of the risk review to make final funding decisions and/or set specific conditions on the award.

D. Selection Process

When making award funding decisions, HUD will consider:

- Threshold review results, including eligibility requirements.
- Merit review results.
- Risk review results.

To the extent allowed by law, HUD may also consider:

- The scope of the overall projected impact on the program and administrative goals and priorities in this NOFO.
- Reasonableness of the estimated costs to the government.
- The applicant's readiness to conduct the proposed work.
- Likelihood that the proposed project will result in the benefits expected.
- Broad range of recipients beyond recurrent recipients.
- Geographic dispersion.
- All else being equal, preference for applicants with lower indirect cost rates.

- Applicants with demonstrated success in implementing Gold Standard Science (applicable to research awards).
- Applicants with potential to produce immediate results and potential for longer-term, breakthrough results, based on the goals of this NOFO (applicable to research awards).

To the extent allowed by law, HUD may:

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

1. Rating and Ranking

a. **Ineligible Applications.** Ineligible applications and those that do not meet *Threshold Review* requirements, V.A., will not be rated or ranked.

b. Ranking. All eligible applications will be ranked based on the total score.

2. Adjustments to Funding

HUD may fund only portions of an application, withhold funds after approval, reallocate funds among activities and/or require that special conditions be added to the grant agreement, under 2 CFR § 200.208, or where:

- HUD determines the amount requested for one or more eligible activities is unreasonable or unnecessary;
- An ineligible activity is proposed in an otherwise eligible project;
- Insufficient funding amounts remain to award the full amount requested in the application, and HUD determines that partial funding is a viable option;
- The past record of key personnel warrants special conditions;
- An applicant has not included the mandatory training funding allocation in the budget and the applicant is selected for an award (HUD will modify the applicant's budget, reallocating the appropriate training amount); or
- An applicant is awarded more than one grant (e.g. HUD will re-examine the organization's training needs).

3. Reallocation of Funds

Any funds remaining after award selections will be reallocated to other FHOI components, and then to other FHIP Initiatives based on need.

E. Award Notices

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

The award notice communicates the amount of the award, important dates, and the terms and conditions you need to follow. The notice may also include HUD-imposed award conditions as provided under [2 CFR 200.208](#).

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

1. Notification

Information about the review and award process will not be available during the HUD evaluation period, which begins on the application deadline date for this NOFO and lasts for approximately 90 days thereafter. However, you will be advised in writing if HUD determines that your application is ineligible or has technical deficiencies which may be corrected. HUD will only communicate with persons specifically identified in the SF-424 in the application. HUD will not provide information about the application to any third party including contractors.

2. Negotiations

If your application is selected for funding, HUD will require you to participate in negotiations to determine the specific terms of your grant agreement. The award selection is conditional and does not become final until the negotiations are successfully concluded and the grant agreement is fully executed based upon the negotiations. HUD will negotiate only with the person identified in the application as the Director of the organization or specifically identified in the application, such as the Project Director. HUD will not negotiate with any third party (i.e., a contractor, etc.). HUD will determine on a case-by-case basis if technical assistance or special conditions are required.

3. Applicant Scores

After awards are announced, applicants may request and receive their final score. HUD will not release the names of applicants or their scores to any third party.

VI. SUBMISSION REQUIREMENTS AND DEADLINES

VI. Submissions Requirements and Deadlines

A. Deadlines

B. Submission Methods

C. Other Submissions

D. False Statements

VI. SUBMISSION REQUIREMENTS AND DEADLINES

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

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

A. Deadlines

1. Application submission deadline:

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

08/06/2026

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

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

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

2. Grace Period for Grants.gov Submissions

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

B. Submission Methods

1. Electronic Submission

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

For instructions on how to submit in [Grants.gov](#), see the [Quick Start Guide for Applicants](#). Make sure that your application passes the [Grants.gov](#) validation checks or we may not get it.

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

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

2. Electronic Submission Application Waiver

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

Use the information in the [Contact and Support](#) section of this NOFO to submit a written request to HUD. You must **submit your waiver request at least 15 calendar days before**

the application deadline.

Submit your waiver request **no later than 15 days prior to the application deadline** to AllaboutFHIP@hud.gov and Katherine.vasilopoulos@hud.gov for consideration. Waiver requests received timely will be submitted to FHEO's Assistant Secretary or his designee for a final determination. If HUD grants you a waiver, the notification will provide instructions on where and how to submit the paper application.

NOTE: HUD HQ must receive paper applications no later than 4:00 PM Eastern Standard Time on the application deadline date. There is no grace period for paper application submissions. HUD recommends applicants send paper applications via a courier that provides a receipt of delivery. All applicants will receive confirmation (via Form HUD 2993) of HUD's receipt of the application, but confirmation might not be received by you before the submission deadline.

A paper application submitted without a waiver granted will not be accepted and will be returned to sender.

C. Other Submission Information

1. Intergovernmental Review

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

2. Technical Application Errors

HUD will contact you to fix a [technical error](#) with your timely application after the due date. Use the following submission requirements to respond to HUD's notice.

a. Fix Errors in Electronic Applications

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

The HUD notice will allow between 48 hours and 14 calendar days from the date of the HUD notice to fix an error. If the due date to fix an error falls on a Saturday, Sunday, Federal holiday, or on a day when HUD's Headquarters is closed, then the due date moves to the next business day.

You must also email the corrections to AllAboutFHIP@hud.gov.

b. Fix Errors in Paper Applications

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

D. False Statements

By submitting an application, you acknowledge your understanding that providing false or misleading information on your application, or during any part of the performance phase of an

award, can lead to serious consequences. Those consequences include but are not limited to: fines, repayment, restitution, prison time, termination of any HUD award, and being banned from receiving any future HUD award and doing business with the federal government (18 USC 1001, 18 USC 1012, 18 USC 1010, 18 USC 1014, 18 USC 287, 31 USC 3729 et seq., 31 USC 3801-3812, FAR Part 9.4, 2 CFR Part 180, other remedies in your HUD award).

Consequences also include: treble damages and civil penalties under the False Claims Act, 31 U.S.C. § 3729 et seq.; double damages and civil penalties under the Administrative False Claims Act, 31 U.S.C. §§ 3801- 3812; civil recovery of award funds; suspension and/or debarment from all federal procurement and non-procurement transactions, Federal Acquisition Regulations Part 9.4 or 2 C.F. R. Part 180; and other remedies including termination of an active HUD award.

By submitting your application, you acknowledge that you have read and understood federal laws and regulations, grant terms and conditions, and rules and requirements applicable to HUD's FHIPs program as described in this NOFO. As part of your application for funding, you must provide the certifications and assurances described below to ensure that you understand your obligation to protect the funds from fraud. Furthermore, grant recipients must require each subrecipient to provide the same anti-fraud certifications and assurances. In support of your application for the grant, you certify under the penalty of perjury, that:

- (1) You have the authority to make the following representations on behalf of yourself and the applicant, and you understand that these representations will be relied upon as material in any HUD decision to make an award to the applicant based on its application,
- (2) You have the legal authority to apply for the federal assistance sought by the application, and that the applicant has the institutional, managerial, and financial capability to ensure proper planning, management, and completion of the project described in the application.
- (3) The information provided in the application is true, accurate, and complete.
- (4) Throughout the period of performance for the award, if any,
 - a. The applicant will comply with and follow all federal laws and regulations, grant terms and conditions, and rules and requirements applicable to HUD's FHIPs program;
 - b. The applicant will require all subrecipients to comply with and follow all federal laws and regulations, grant terms and conditions, and rules and requirements applicable to HUD's FHIPs;
 - c. The applicant will notify HUD within fifteen (15) calendar days if the applicant becomes aware of any violation of HUD requirements pertinent to the award by any person or entity including, but not limited to the applicant, any subrecipient, or contractor;
 - d. The applicant will maintain safeguards to address and prevent any conflicts of interest, and to prohibit employees from using their positions in any manner that poses, or appears to pose, a personal or financial conflict of interest; and
 - e. The applicant will comply with HUD's conflict-of-interest requirements including but not limited to those under 24 CFR 125.201.
- (5) The applicant will give HUD, the Office of Inspector General, and the Comptroller General

of the United States, through any authorized representative, access to and opportunity to examine all records, books, papers, documents, or electronic records related to the award, if any, made by HUD.

(6) The applicant will establish an accounting system in accordance with generally accepted accounting standards or HUD directives, consistent with 2 C.F.R. § 200.302, "Financial Management," and 2 C.F.R. § 200.303, "Internal Controls."

(7) The applicant will submit the performance, financial, and program reports as outlined in the NOFO and required by federal laws and regulations.

(8) The applicant will require that the language of these Anti-Fraud Certifications and Assurances be included in the award documents or agreements for all subawards as defined at 2 CFR 200.1 and that the applicant will seek from all subrecipients the same certifications and assurances.

(9) You understand that complying with the terms, conditions, and requirements of your award, if any, is a material condition of remaining eligible for HUD funding.

VII. POST - AWARD REQUIREMENTS AND ADMINISTRATION

VII. Post-Award Requirements and Administration

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

VII. POST-AWARD REQUIREMENTS AND ADMINISTRATION

Standard post-award requirements are available online at:

<https://www.hud.gov/stat/fheo/initiatives-program>.

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

You must follow the applicable provisions in the [Administrative, National & Departmental Policy Requirements and Terms for HUD Financial Assistance – 2026](#):

Administrative

1. Build America, Buy America (BABA) (Sections 70901-52 of [Public Law 117-58](#); [41 U.S.C. 8301 et seq](#); and [2 CFR Part 184](#))
2. Uniform Relocation Assistance and Real Property Acquisition Policies Act ([42 U.S.C. § 4601 et seq](#); [49 CFR part 24](#); and applicable program regulations)
3. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR part 200](#))
4. HUD requirements related to safeguarding resident/client files consistent with [2 CFR 200.303\(e\)](#)
5. The Federal Funding Accountability and Transparency Act (FFATA) ([2 CFR part 170](#))
6. Eminent Domain
7. Participation in HUD-Sponsored Program Evaluation ([12 U.S.C. 1701z-1](#); 12 U.S.C. 1702z-2; [24 CFR part 60](#); and [FR-6278-N-01](#))
8. The Freedom of Information Act (FOIA) ([5 U.S.C. § 552\(b\)](#) and [24 CFR 15.107\(b\)](#))
9. Presidential Executive Actions affecting federal financial assistance programs
 - [Executive Order \(EO\) 14332](#) (*Improving Oversight of Federal Grantmaking*)
 - [EO 14303](#) (*Restoring Gold Standard Science*)
 - [EO 14219](#) (*Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative*);
 - [EO 14218](#) (*Ending Taxpayer Subsidization of Open Borders*);
 - [EO 14202](#) (*Eradicating Anti-Christian Bias*);
 - [EO 14205](#) (*Establishment of the White House Faith Office*)
 - [EO 14182](#) (*Enforcing the Hyde Amendment*);
 - [EO 14173](#) (*Ending Illegal Discrimination and Restoring Merit-Based Opportunity*);
 - [EO 14168](#) (*Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*)
 - [EO 14151](#) (*Ending Radical and Wasteful Government DEI Programs and*

Preferencing); and

- [EO 14148](#) (*Initial Rescissions of Harmful Executive Orders and Actions*)

Civil Rights and Other Protections

10. The Fair Housing Act ([42 U.S.C. 3601-3619](#)) and Civil Rights laws (24 CFR 5.105(a))

12. Economic Opportunities for Low-and Very Low-income Persons ([12 U.S.C. § 1701u](#) and [24 CFR part 75](#))

13. Compliance with Immigration Requirements ([8 U.S.C. § 1601-1646](#); [8 U.S.C. § 1324a](#) ("*Unlawful employment of aliens*"); and [Executive Order 14218](#), *Ending Taxpayer Subsidization of Open Borders*)

14. Accessible Technology requirements ([29 U.S.C. § 794d](#); [29 U.S.C. 794](#); and [42 U.S.C. 12131-12165](#) and implementing regulations at 36 CFR part 1194 (Section 508 regulations), [24 CFR § 8.6](#) (Section 504 effective communication regulations), [28 CFR part 35, subpart H](#) (DOJ Web Access Rule), and [28 CFR part 35, subpart E](#) (DOJ's Title II communications regulations))

15. Ensuring, when possible, the consideration of small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms consistent with [2 CFR 200.321](#)

16. Equal Participation of Faith-based Organizations in HUD Programs and Activities consistent with [42 U.S.C. 2000bb et seq.](#); [24 CFR 5.109](#); [Executive Order \(EO\) 14202](#), *Eradicating Anti-Christian Bias*; and [EO 14205](#), *Establishment of the White House Faith Office*

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

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

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

Environmental

20. Environmental requirements that apply in accordance with [24 CFR part 50](#) or [part 58](#); [42 U.S.C. 4321 et seq.](#)

Business Integrity

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

22. Prohibition on Certain Telecommunication and Video Surveillance Services or Equipment ([41 U.S.C. § 3901](#) and [2 CFR 200.216](#))

23. Waste, Fraud, Abuse, and Whistleblower Protections ([41 U.S.C. § 4712](#))

24. Drug-Free Workplace ([2 CFR part 2429](#))

In addition, if any part or provision of the award agreement or terms of this NOFO are enjoined or held to be void or unenforceable in any jurisdiction, they shall be ineffective as to such jurisdiction and only to the extent of such prohibition or injunction and shall not invalidate or affect the legality or enforceability of the remaining provisions and applications of the Agreement and Notice. In the event the injunction of such provisions is stayed, dissolved, or reversed, the full terms of the award agreement and NOFO, including such provisions, will automatically become effective. This clause is self-executing and will become effective, binding, and enforceable automatically upon issuance of this NOFO.

25. Additional Terms

- a. Awards made under this NOFO will not be used to engage in illegal racial discrimination including unlawful racial preferences.
- b. Awards made under this NOFO will not be distributed in a way that violates or otherwise is used to interfere with constitutional protections guaranteed for speech and religious beliefs and the free exercise of religion.
- c. Awards made under this NOFO will not be used in violation of 21 U.S.C. § 856 or §863, relating to the federal prohibitions on drug distribution.
- d. Pursuant to 2 CFR 200.332(b)(2), all agreements or contracts made with subrecipients under this NOFO must contain the same terms and conditions as those in the grant agreement issued by HUD. Any conflicting terms and conditions must be approved by HUD.

These post award requirements are imposed where allowable by federal law and not restricted by a judicial order from a court of competent jurisdiction.

B. Environmental Requirements

1. Environmental Review

Activities funded under this NOFO are exempt or categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 USC § 4321) and not subject to environmental review under related laws and authorities. The exemption or categorical exclusion is in accordance with 24 CFR CFR 50.19(b)(2), (3), (4), (9), (12) and (13).

2. NOFO Impact Determination Related to the Environment

This NOFO provides assistance in promoting or enforcing fair housing or nondiscrimination laws. Accordingly, under [24 CFR 50.19\(c\)\(3\)](#), this NOFO is categorically excluded from environmental review under the National Environmental Policy Act of 1969 (42 USC § 4321).

3. Lead-Based Paint Requirements

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

C. Remedies for Noncompliance

HUD may terminate all or a part of your award as described under 2 CFR 200.340 through 200.343 pursuant to the terms and conditions of your award, including, to the extent

authorized by law:

- if an award no longer effectuates the program goals or agency priorities; or
- in the case of a partial termination, if HUD determines that the remaining portion of the award will not accomplish the purposes for which the HUD award was made.

HUD may also impose specific conditions on your award or take other remedies as described by 2 CFR 200.339 through 200.343, if you do not comply with your award terms and conditions.

1. Performance Sanctions. A grantee or subrecipient violating the requirements in its grant agreement will be liable for such sanctions as authorized by law, including repayment of improperly used funds, termination of further participation in the FHIP, and denial of further participation in programs of HUD or any federal agency.

2. Appeals. In accordance with 2 CFR 200.340 and 200.342, if HUD terminates an award made under this NOFO, the grantee has a right to appeal the decision to terminate. To appeal a decision to terminate an award made under this NOFO, the grantee must, within 30 days of the notice of termination, send its appeal and all supporting information and documentation to AllAboutFHIP@hud.gov and the Director of FHIP. Within 30 days of receipt of the appeal, FHEO will communicate in writing to the grantee either: the decision on the appeal; a request for additional information or documentation; or a revised timeline for a decision.

D. Reporting

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

Further, the Recipient hereby acknowledges that HUD is in the process of implementing new grants management and reporting tools for all records pertinent to the Federal award. Recipient agrees to report on grant performance and financial activities (including vendor and cash disbursement supporting details for the Recipient and its Subrecipients) using these new tools when they are released and to satisfy occasional requests for records pertinent to the federal award, consistent with the requirements for recordkeeping, access to records, and reporting laid out in 2 CFR part 200, which may be amended from time to time. HUD will work with the Recipient to support its transition to the new reporting tools. HUD reserves the right to exercise all of its available rights and remedies for any noncompliance with these grants management and financial reporting requirements, to include, without limitation, requiring additional or more detailed financial reports, suspension of disbursements, and all other legally available remedies, to the furthest extent permitted by law.

Report	Description	When
Federal Funding Accountability and	• Awards equal to or greater than \$30,000 • Data on executive compensation and first-tier subawards	See 2 CFR Appendix A to

Report	Description	When
Transparency Act (FFATA)	- See Public Law 109-282 and 2 CFR part 170 - HUD reports initial prime recipient data to usaspending.gov - Submit via SAM.gov	Part 170(a)(2)(ii)
Reporting on Recipient Integrity and Performance Matters	- Total value of all current Federal awards exceeds \$10,000,000 for any period of time during the period of performance of this Federal award - See Appendix XII to 2 CFR part 200 - Submit via SAM.gov	See 2 CFR Appendix x-XII to Part 200 I.(d)
Progress Report	- Summary of progress status - Work to be performed during the next reporting period - Any anticipated risks and plans to mitigate those risks	Quarterly grant and financial activity reporting is required. Grantees are required to maintain appropriate records to support actual expenditures by budget line item of funds used.
Federal Financial	- Summary of key financial data - See 2 CFR 200.328	See 2 CFR 200.328

Report	Description	When
Report, SF-425		or award terms
Race, Ethnicity, and Other Data Reporting	Recipients that provide HUD-funded program benefits to individuals or families, report data on the race, color, religion, sex, national origin, age, disability, and family characteristics of persons and households funded by this program	
Single audit	- Single audit: annual expenditure equal to or greater than \$1,000,000 in Federal awards - Required for the fiscal year in which the expenditure occurs - Financial statement audit and programmatic compliance evaluation Report at: www.fac.gov	See 2 CFR part 200 subpart F and Appendix XI to 2 CFR part 200

1. Program-Specific Requirements

a. Recipients are required to submit not less than annually a report documenting achievement of outcomes under the purpose of the program and the work plan in the award agreement.

b. Quarterly Report/Final Report. All grant recipients under this NOFO are required to submit quarterly progress and budget expenditure reports and a final report documenting progress toward the organizational objectives established in the approved Statement of Work .

Quarterly and Final Reports should measure both organizational outputs and institutional outcomes and should include, as applicable:

- Progress toward achieving the organizational goals and performance measures identified in the approved Statement of Work.
- Organizational capacity improvements achieved during the reporting period, including staffing, technology, management systems, governance, partnerships, or operational enhancements.
- Progress toward expanding fair housing services into underserved geographic areas, emerging issue areas, or specialized fields of enforcement.
- Significant organizational accomplishments that strengthened the recipient's ability to investigate, identify, prevent, or remedy discriminatory housing practices.
- Progress in developing sustainable organizational capabilities expected to continue beyond the period of Federal assistance.

- Collaborative activities undertaken with governmental agencies, educational institutions, professional organizations, or other fair housing partners.
- Measurable improvements in organizational effectiveness, operational efficiency, institutional resilience, or long-term sustainability resulting from activities funded under this cooperative agreement.

Any additional performance measures identified in the approved cooperative agreement and incorporated into the recipient's negotiated Statement of Work.

In quarterly reports and the final report, recipients will be required to report outcomes, evidence of continued project success, and meaningful data derived from client feedback on how they benefited from the organization's project activities in quarterly and final performance reports. These will be evaluated as part of the performance assessment. Additional report information may include but are not limited to: (1) positive customer experience; (2) efficient and effective administrative costs; (3) high ethical standards; (4) overall positive community/target area changes; (5) innovative strategies that contribute to cost-effectiveness and other program improvements and success stories (give an enforcement success, e.g., settlement and investigation outputs and outcomes). Grantees will be required to track outcomes in the final report using the following forms: Types of Closures (HUD-904-A); Bases and Issues in Test (HUD-904-B); and Bases and Issues of Reports of Discrimination (HUD-904-C).

E. FHIP FHOI Post-Award Requirements

1. Payments and Reimbursement

a. Payment Contingent on Completion

HUD will make awards under this funding announcement. Accordingly, payment of FHIP funds are made based on the satisfactory and timely completion of your project activities, including the final product(s) and/or any reports to be produced as reflected in your grant agreement. Requests for funds must be accompanied by grant activity progress reports and financial reports showing actual expenditures compared to the budget.

b. Double Payments

If an applicant is awarded funds under this NOFO, the applicant (and any subrecipient or consultant) may not charge or claim credit for the activities performed under this project under any other Federally assisted project.

c. Program Income

Program income is income earned that can defray program costs. With respect to the use of program income under FHIP awards, program income is applied under the deduction method. With this method, program income is deducted from the total allowable costs, reducing the overall total amount of the Federal award. Program income includes settlement funds obtained by the Grantee through FHIP funded litigation for conducting program activities, such as investigation, testing, etc.

2. Organizational Requirements

a. Performance Standards

Applicants must maintain an annual performance assessment rating from the FHIP HUD GTR as "good" or funding may be reduced until performance issues are resolved, and if unresolved, HUD has a right to rescind funding.

b. Eligibility Following Organizational Corporate Structural Changes

HUD recognizes that QFHOs and FHOs may undergo corporate restructuring, including through merger, acquisition, or the like. A resulting organization does not simply inherit QFHO or FHO status, but instead must demonstrate its own qualifications to bear such status. To determine if the resulting organization qualifies as a QFHO or FHO, HUD will examine the enforcement-related experience of the resulting organization as it is constituted after the corporate change.

If HUD determines that the organization is eligible, then HUD will issue a new award agreement and require submission of a Code of Conduct for the new organization and an establishment of the new eLOCCS account. In addition, the new organization must secure a new Unique Entity Identifier (UEI) and have an active registration in SAM before HUD will make an award to the new organization or allow funds to be drawn.

3. Programmatic Requirements

a. Testing Requirements

All recipients must certify compliance with FHIP Regulation 24 CFR §125.107, when fair housing testing is being performed. Reasonable costs associated with criminal background checks for fair housing testers are an allowable budget expense.

b. Review and Approval of Testing Training Materials

If funded, during negotiations HUD will require you to submit copies of these documents to HUD for review:

- (1) All training materials to be provided for testing training; and
- (2) Other forms, protocols, cover letters, etc., used in the conduct of testing and reporting of results.

c. Grant Materials/Product Information

All grant-related materials to be publicly disseminated including press releases must be submitted to HUD for review and approval at least fifteen (15) days before intended first use.

d. Copyright Materials

You may copyright any work eligible for copyright protection subject to HUD's right to reproduce, publish, or otherwise use your work for Federal purposes, and to authorize others to do so as required in 2 CFR 200.315.

e. Complaints Against Awardees

Each FHIP award is overseen by a HUD Grant Officer. Complaints from the public against FHIP grantees should be forwarded to the POC listed below in Section VIII.A. Agency Contact(s). If, after notice and consideration of relevant information, the Grant Officer concludes that there has been inappropriate conduct, such as a violation of FHIP requirements, terms or conditions of the grant agreement, or any other applicable

requirement, HUD will take appropriate action. Such action may include: written reprimand; consideration of past performance in awarding future FHIP applications; repayment to HUD of funds received under the grant; or temporary or permanent denial of participation in FHIP under 24 CFR 24. In addition, HUD reserves its rights to pursue all rights and remedies under 2 CFR 200.339-200.243.

VIII. CONTACT AND SUPPORT

VIII. [Contact and Support](#)

A. [Agency Contact](#)

B. [Grants.gov](#)

C. [Sam.gov](#)

D. [Debriefing](#)

E. [Applicant Experience Survey](#)

F. [Other Online Resources](#)

VIII. CONTACT AND SUPPORT

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

A. Agency Contact

1. Program and Application Requirements

Name: Katherine Vasilopoulos

Phone: 202-402-8701

Email: katherine.vasilopoulos@hud.gov

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

2. Paper Application Waiver Request

Name: Katherine Vasilopoulos

Email: katherine.vasilopoulos@hud.gov

Phone: 202-402-8701

HUD Organization: FHEO

Street: 2415 Eisenhower Avenue

City: Alexandria

VA VIRGINIA

22314

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

B. Grants.gov

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

C. SAM.gov

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

D. Debriefing

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

Upon your written request, HUD will send you the total score earned by your application, as

well as a list of scoring areas where points were frequently deducted from applications. HUD will conduct the debriefing in writing and may limit the information provided to protect the integrity of the competition.

E. Applicant Experience Survey

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

F. Other Online Resources

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

APPENDIX

[Appendix](#)

[Appendix I Definitions](#)

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APPENDIX

Appendix I. Definitions

1. Standard Definitions

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

Authorized Organization Representative (AOR) is the person with legal authority to: give assurances, make commitments, submit your application, and enter into agreements with HUD. They also have [special permissions](#) to act on behalf of their organization within the Grants.gov system.

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

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

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

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

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

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

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

Threshold Requirements are eligibility requirements you must meet before HUD rates your application for funding.

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

2. Program Definitions.

Affiliate is a business entity effectively controlling or controlled by another or associated with others under common ownership or control.

Allegation is a claim of a violation of a fair housing law in effect within the applicant's service area.

Broad-based means not limited to a single fair housing issue (such as insurance, mortgage lending, or advertising) but rather covering more than one issue related to discrimination in the provision of housing covered under the Fair Housing Act.

Complaint is a filed fair housing complaint accepted by HUD or a Fair Housing Assistance Program agency as jurisdictional, or a complaint filed in a State or federal court alleging violations of the Fair Housing Act or equivalent State or local law.

Fair Housing Act (FHA) is Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601-3620).

Fair Housing Assistance Program (FHAP) Agencies as described in 24 CFR Part 115 are

State and local fair housing enforcement government agencies that receive FHAP funds to administer laws deemed substantially equivalent to the Fair Housing Act.

Fair Housing Enforcement Organization (FHO) is an organization engaged in fair housing activities, as defined in [24 CFR § 125.103](#).

Full-service Projects must provide services to all eligible people and include these enforcement-related activities in the project application: interviewing potential victims of discrimination; intake of complaints; testing; evaluating testing results; conducting preliminary investigations; conducting mediation; conciliating; enforcing meritorious claims through litigation or referral to administrative enforcement agencies; and disseminating information about fair housing laws.

Government Technical Monitor (GTM) means the HUD individual who has been designated to provide technical monitoring, advice, and assistance, to aid the GTR in the technical and financial oversight and evaluation of the grantee's performance.

Government Technical Representative (GTR) means the HUD individual who is responsible for the technical administration of the grant, the evaluation of performance under the grant, the acceptance of technical reports or projects, and other such specific responsibilities as may be stipulated in the grant, and approval of payment.

Indirect Costs has the meaning in 2 CFR 200.1.

Intake is a fair housing allegation contact/query received by a fair housing organization. Intake does not include inquiries unrelated to fair housing, including general housing, inquires based solely on landlord/tenant matters, or others. Intakes may be in-person or by phone, mail or email contact and documented through the fair housing organization's standard intake form or database entry. Information gathered at intake starts the fair housing process. Repetitive contacts from a single individual may not be counted as an additional intake unless the contact contains a new allegation or relates to a new respondent. Intakes do not include someone returning a non-enforcement-related telephone call, a telemarketer calling the office, or incoming personal telephone calls.

Integration or Integrated Settings for purposes of the NOFO, means in the context of housing, settings that enable individuals with disabilities to live like individuals without disabilities. Integrated settings also enable individuals with disabilities to live independently with individuals without disabilities and without restrictive rules that limit their activities or impede their ability to interact with individuals without disabilities. Examples of integrated settings include scattered-site apartments providing permanent supportive housing, tenant-based rental assistance that enables individuals with disabilities to lease housing in integrated developments, and apartments for individuals with various disabilities scattered throughout public and multifamily housing developments. By contrast, segregated settings are occupied exclusively or primarily by individuals with disabilities. Segregated settings sometimes have qualities of an institutional nature, including, but not limited to, regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, limits on individuals' ability to engage freely in community activities and manage their own activities of daily living, or daytime activities primarily with other individuals with disabilities.

Jurisdiction under the Fair Housing Act is established when the complaint is filed in a timely

manner; the complainant has apparent standing; the respondent and the dwelling involved (where the complaint involves a provision or denial of a dwelling) appear to be covered by the Fair Housing Act; and the subject matter and the basis of the alleged discrimination may constitute illegal practices as defined by the Fair Housing Act.

Meritorious Claims are enforcement activities by an organization that result in lawsuits, consent decrees, legal settlements, HUD and/or substantially equivalent agency conciliations, or organization-initiated settlements, with the outcome of monetary awards for compensatory and/or punitive damages to plaintiffs or complaining parties, or other affirmative relief, including the provision of housing [24 CFR § 125.103](#).

Operating Budget is an organization's total planned budget expenditures from all sources, including the value of in-kind and monetary contributions, in the period for which funding is requested.

Partnership is a collaboration with one or more identified agencies, task forces, FHAP organizations, or other groups to successfully realize the service or activity planned. A partnership may be formal and contractual with specific roles and deliverables defined, or less formal cooperation through volunteer efforts accomplished without a contract.

Qualified Fair Housing Enforcement Organization (QFHO) is an organization engaged in fair housing activities as defined in 24 CFR § 125.103.

Recipient has the meaning in 2 CFR 200.1.

Referral means referring to HUD or to a FHAP agency an intake, alleging possible violations of fair housing laws.

Regional/Local/Community-Based Activities are delineations of Education and Outreach Initiative activities defined at 24 CFR §125.301(d). Regional activities are implemented in adjoining States or two or more units of general local government within a state. Local activities are those whose implementation is limited to a single unit of general local government, meaning a city, town, township, county, parish, village, or other general purpose political subdivision of a State. Activities that are community-based in scope are those which are primarily focused on a particular neighborhood area within a unit of general local government.

Rural Areas include any of the following:

- a. A non-urban place having fewer than 2,500 inhabitants (within or outside of the metropolitan areas).
- b. A county or parish with an urban population of 20,000 or fewer inhabitants.
- c. Territory, including its persons and housing units, in rural portions of "extended cities." The Census Bureau identifies the rural portions of extended cities.
- d. Open country that is not part of or associated with an urban area. The United States Department of Agriculture describes "open country" as a site separated by open space from any adjacent densely populated urban area. Open space includes undeveloped land, agricultural land, or sparsely settled areas, but does not include physical barriers (such as rivers and canals), public parks, commercial and industrial developments, small areas reserved

for recreational purposes, or open space set aside for future development.

e. Any place in whole or in part, not located in a Metropolitan Statistical Area.

Statement of Work (SOW) is a document that describes all the tasks necessary to do the work of a project, including all the steps needed for good management control and specificity regarding work to be done and deliverables, dates and persons responsible for and/or assigned to such work, and provides a basis for mutual understanding of the requirements and tasks.

Subaward has the meaning in 2 CFR 200.1.

Subrecipient has the meaning in 2 CFR 200.1.

Testing is an investigative tool used to gather evidence. A test is a covert investigation by a QFHO or FHO involving one or more persons who initiate contact with a person or entity to gather information about housing policies, treatment and/or practices to compare with the requirements of fair housing laws or other civil rights laws. A test may involve comparing how persons similarly situated except for a protected characteristic are being treated.

- **Complaint Based Testing** is Fair Housing Testing conducted in response to a specific allegation of a discriminatory housing practice or a complaint made by an aggrieved party.
- **Fair housing audit testing** is Fair Housing Testing conducted in response to: an allegation or statement, made by a group or individual who does not wish to file a complaint, or offered by a fair housing organization upon knowledge and information or information and belief; or specific testable information obtained by a grantee organization, for example, receipt of a housing related advertisement that is or may be discriminatory.

Underserved Areas are areas where there are no FHIP or FHAP agencies and/or where either no public or private fair housing organizations exist, or the jurisdiction is not sufficiently served by one or more public or private fair housing organizations and there is a need for service.

APPENDIX A

FHOI

Appendix A. Statement of Work Chart – Sample Format

Instructions: Administrative Tasks listed are standard tasks; however an applicant may edit the section to fit the specific tasks necessary for the applicant's project. Each applicant should edit the Program Tasks section, and if needed add or remove tasks to propose a complete detailed SOW based on the specific enforcement and, as applicable EOI activities, proposed application, including all activities and tasks, and proposed outcomes.

Proposed Project:

The recipient, [insert organization name], agrees to undertake the following activities in accordance with its award for funding under the [insert Initiative/Component for (Year 1/Year 2)] of a 24-month project, commencing on [insert start date] and ending on [insert end date] in [insert geographic area to be served].

SUMMARY OF PROGRAM GOALS AND OBJECTIVES:

The recipient must describe a procedure to ensure that complaints are referred to HUD and describe the safeguards used to ensure that complaints are jurisdictional.

All Initiatives- Activities and tasks in the SOW Chart must be measurable. [For example, Complete 10 tests each quarter; OR Conduct one education and outreach event in Quarter 2; OR Produce and distribute to community organizations 100 fair housing flyers in Quarter 3].

PROJECT MATERIALS: Press releases and any other grant related materials intended to be disseminated to the public must be submitted to HUD for review and approval no later than 15 days before intended use, and in accordance with the provisions set forth in Schedule A of the grant agreement. As a rule, products created using grant funds shall be in the English language only. HUD acknowledges there may be exceptions to that rule; proposals for translation of materials into a language or languages other than English will be determined based upon need for each specific grant and specific deliverable(s) on a case-by-case basis, if requested in writing by the awardee.

HUD anticipates that products will be accessible for all program participants. HUD anticipates that program activities will be accessible to all participants/beneficiaries.

All activities and costs within the Statement of Work (SOW) and budget must be fair housing related activities, and must demonstrate a connection to furthering the nondiscrimination provisions of the Fair Housing Act.

Agendas, training materials, slide decks, etc for conferences and/or education events held or convened by the grantee using grant funds must be approved by HUD in advance of scheduling the event.

Staff training related to the grant is accomplished through FHIP \$7500 set aside for HUD sponsored or approved training included in Other Direct Costs. All grant related training using FHIP funds must be approved by HUD. If you choose to include internal training of staff in the SOW, additional expenditures for training cannot be included in the project budget.

You should discuss your project purpose and proposed activities, persons to be served, geographical areas and methodology and their relation to HUD's policy priorities.

EOI funding is for EOI purposes only. EOI funds may not be used for AEI, FHOI, or PEI activities.

FHOI – Review and Approval of Testing Methodology

Testing undertaken as part of the PEI grant should be discrete, for example, complaint-based, audit based, and/or enforcement related, and cannot be "systemic" in nature. If your application proposes testing, before undertaking testing activities, HUD will require you to submit for approval copies of the testing methodology to be used; training materials to be provided for testing, and other forms, protocols, cover letters, etc. used in the conduct of testing and reporting of results. You may provide your materials with a letter of prior approval; however, all testing materials, methodologies and protocols must be submitted to HUD for review.

New applicants/grantees should include a proposal to develop a testing program.

Accessibility testing cannot be targeted only at RAD conversion projects. It must incorporate any type of locally available public housing within the testing program or remove this activity. (Should be a broad-based and full service project.)

Enforcement related activities based upon national origin discrimination that implicate languages other than English are permitted only in specific instances where language was used as a pretext for intentional national origin discrimination.

RELEVANT TESTING DEFINITIONS:

Complaint based fair housing testing is Fair Housing Testing conducted in response to a specific allegation of a discriminatory housing practice or a complaint made by an aggrieved party.

Fair housing audit testing is Fair Housing Testing conducted in response to: an allegation or statement, made by a group or individual who does not wish to file a complaint, or offered by a fair housing organization upon knowledge and information or information and belief; or specific testable information obtained by a grantee organization, for example, receipt of a housing related advertisement that is or may be discriminatory.

Grantees must submit a statement affirming compliance with 24 CFR 125.107.

TESTERS: Testers and the organizations conducting tests, and the employees and agents of these organizations may not:

- (1) Have an economic interest in the outcome of the test;
- (2) Be a relative by adoption, blood, or marriage of any party in a case;
- (3) Have had any employment or other affiliation, within one year, with the person or organization to be tested; or
- (4) Be a direct competitor of the person or organization to be tested in the listing, rental, sale, or financing of real estate.

Subcontracts - All subcontracts must be provided to HUD for review. HUD will review the subcontract and retains the right to disapprove a subcontractor/subrecipient.

Research Activities – Applicants are ineligible for funding if their project is aimed solely at research.

All - All services and activities must be available to all persons. All FHIP funded projects must address housing discrimination based upon race, color, religion, sex, disability, familial status, or national origin - protected characteristics that are covered by the plain language of the federal Fair Housing Act. For example, the Fair Housing Act prohibits discrimination based only on the following specifically protected characteristics: race, color, national origin, religion, sex, familial status, and disability. The Fair Housing Act does not include protections for sexual orientation, gender identity, and gender expression; "source of income"; criminal records; weight and height; or limited English proficiency.

Fair Housing and Free Speech Apart from those protections that are afforded under both the Fair Housing Act and the First Amendment of the Constitution, specifically those relating to religious protections, none of the amounts made available under this NOFO may be used for enforcement related activities, including investigations, of speech or actions protected by the First Amendment to the U.S. Constitution. Such speech or actions include without limitation (a) the filing or maintaining of a non-frivolous legal action, and (b) activities engaged in for the purpose of achieving or preventing action by a government official or entity. Amounts under

this NOFO are solely for the investigation, enforcement of and claims asserted under the Fair Housing Act, or cognizable under the Fair Housing Act pursuant to equivalent state and local laws with rights and remedies consistent with the Fair Housing Act.

Performance Measure and Products – You must demonstrate how project activities will support HUD goals; and must identify measurable performance measures/outcomes in support of those goals.

Achieving Results and Program Evaluation – You must indicate specific outcomes and outputs to assess progress, evaluate program effectiveness, and identify program change.

Indirect Cost Rate - If you have a Federally negotiated indirect cost rate, you must use that rate and the appropriate base in this section. In all other instances, if you choose to utilize indirect costs you must include your current overhead rate, if any, which has been tailored to your organization's operating budget.

STATEMENT OF WORK

ADMINISTRATIVE TASKS

FY2025/2026 FHIP FHOI Grant

24 Month Project: Year 1/ Year 2

Period of Performance:

You must submit a separate SOW for each consecutive 12-month period of performance or your application will be deemed ineligible and will not be reviewed.

This template lists necessary Administrative and Program Tasks. You may edit the tasks to adapt to your proposed project, and you may add tasks as needed for the successful implementation and completion of your proposed project. If you propose hiring key personnel to fill project related positions, you must include an Administrative Task to recruit (advertise) and hire for the position, to provide HUD with the hiring notice and the resume of the selected applicant.

Activities/Tasks	Deliverables/Measurable Outcomes	When Required to be Submitted	Key Personnel Responsible for submitting to HUD:
1. Assign staff to project:	1. Names of persons assigned to project 2. Number of hours to be spent on project per person and percent of time.	30 days/Initial Report	
2. Statement of	Statement affirming the	30 days/Initial	

Compliance with 24 CFR§ 125.107	testing program and its tester comply with 24 CFR§ 125.107	Report	
3. Submit Conflict of Interest	Submit copy of Conflict of Interest	30 days/Initial Report	
4. Submit Code of Conduct	Submit copy of Code of Conduct. Code of Conduct must be provided to HUD's Grants Management Office Library AskGMO@hud.gov	30 days/Initial Report	
5. Submit Continuity of Operations Plan - COOP	Submit copy of COOP	30 days/Initial Report	
6. Complete HUD-2880 Disclosure Statement.	Submit Disclosure Statement. If no changes occur, submit quarterly statement of no change.	Quarterly	
7. Complete HUD 27061 Race and Ethnic Data Reporting Form	Submit the completed form	Quarterly	
8. Complete SF-LLL Disclosure of Lobbying Activities.	Submit copy of SF-LLL. If no changes occur, submit quarterly statement of no change.	Quarterly	
9. Complete SF-425 Federal Financial Report and Cumulative Expenditure Reports	1. Submit copy of SF-425 2. Submit cumulative actual expenditure report with budget line item detail	Quarterly	
10. Submit voucher for payment.	Submit payment request to LOCCS.	Per Payment Schedule and	

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specific to your proposed project.

FY2025/2026 FHIP FHOI Grant

24 Month Project – Year 1/ Year 2

Period of Performance:

You must submit a separate SOW for each consecutive 12 month period of performance or your application will be deemed ineligible and will not be reviewed.

Activities/Tasks	Deliverables/Measurable Outcomes	When Required to be Submitted	Key Personnel Responsible for submitting to HUD:
1. Review/refine referral process to refer potential victims to HUD, DOJ, a FHAP, or a private attorney.	Submit copy of referral process.	Initial/30 Days	
2. Submit all testing methodology/methodologies and tester training materials for review and approval.	Submit tester methodology/methodologies and tester training materials to HUD for approval	Quarter 1	
3. Develop tester recruitment plan to ensure an available and adequate tester pool. Recruit xx new testers.		1 st / 2 nd Quarter	
4. Train/Retrain xx testers.. At least x testers will be trained per quarter, beginning in the 2 nd quarter.	Submit dates of training and list of testers who are trained, complete a criminal background check, and complete a practice test and type of training received.	2 nd , 3 rd , and 4 th Quarter	
5. Where applicable, refer or file xx jurisdictional and	Submit report of enforcement activities in	Quarterly	

meritorious complaints to HUD, DOJ, FHAPs, private attorneys, or in state or federal court. At least x complaints will be referred or filed per quarter.	addition to data in enforcement log.		
6. HUD Forms 904-A- "Type of Closures", 904-B "Bases and Issues in Tests", and 904-C "Bases and issues of Reports of Discrimination"	Submit completed HUD Forms 904-A, 904-B, and 904-C	Quarterly and with Final Report	
7. Monitor xx settlement agreements.	Submit report of enforcement activities.	When monitoring occurs	
8.			

APPENDIX C

FY2025/2026 CERTIFICATION FOR FHOI APPLICANTS

I (Applicant's AOR), certify under penalty of perjury that the information provided below is true, accurate, and correct.

In accordance with 24 CFR §125.501, Fair Housing Organizations Initiative:

(a) The Fair Housing Organizations Initiative of the FHIP provides funding to develop or expand the ability of existing eligible organizations to provide fair housing enforcement, and to establish, on a single-year or multi-year basis contingent upon annual performance reviews and annual appropriations, new fair housing enforcement organizations.

(b) Continued development of existing organization - (1) Eligible applicants for funding under this component of the Fair Housing Organizations Initiative are:

- (i) Qualified fair housing enforcement organizations as defined under 24 CFR 125.103;
- (ii) Fair housing enforcement organizations as defined under 24 CFR 125.103;
- (iv) Other non-profit groups working to build their capacity to provide fair housing enforcement.

Additionally, 42 USC 3616a(a) overall provides the Secretary may enter into contracts with other public or private entities that are formulating or carrying out programs to prevent or eliminate discriminatory housing practices.

You must certify that your organization is an eligible organization that falls within category 1, 2, or 3 below, to apply for FHOI components, pursuant to the statutory and regulatory eligibility requirements:

I certify that, consistent with the requirements of 42 USC 3616a, if my organization is selected for an award, FHIP funding may not provide more than 50% of the operating budget of the recipient organization for any one year;

AND for entities qualifying under Categories 1 and 2

I _____ certify that

(Applicant AOR name as it appears on SF-424) (Applicant Organization name as it appears on SF-424)

is a tax-exempt, nonprofit, charitable organization and has a "letter of determination" from the IRS confirming 501(c)(3) status

Category 1

AND I certify that _____ is
(Applicant Organization name as it appears on SF 424)

a Qualified Fair Housing Enforcement Organization (QFHO), or a Fair Housing Enforcement Organization (FHO) with at least one year experience in complaint intake, complaint investigation, testing for fair housing violations, and meritorious claims.

As defined by 24 CFR Part 125.103, my organization is a:

___ QFHO (entity has at least two years of enforcement-related experience); and is currently engaged in each of the following activities at the time this application is submitted: Complaint intake; Complaint investigation; Testing for fair housing violations; and Enforcement of meritorious claims.

or

___ FHO (entity has at least one year of enforcement-related experience); and is currently engaged in each of the following activities and upon receipt of funds will continue to be engaged in each activity: Complaint intake; Complaint investigation; Testing for fair housing violations; and Enforcement of meritorious claims.

Authorized Signature Date

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

OR

Category 2

AND I certify that _____ is an other
(Applicant Organization name as it appears on SF 424)

____ Nonprofit group seeking to build their capacity to provide fair housing enforcement services (24 CFR 125.501).

Authorized Signature Date

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Category 3

OR I certify that _____ is an other
(Applicant Organization name as it appears on SF 424)

____ Other public or private entity that is formulating or carrying out programs to prevent or eliminate discriminatory housing practices (42 USC 3616a(a)).

Authorized Signature Date

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

NOTE: HUD will verify this certification for all applicants through the organization's response to Factor 1 and the letter of determination.

All nonprofit applicants must submit an IRS letter of determination confirming not for profit status.

APPENDIX C

This information must be in letter and number characters only. Do not include symbols, graphs, charts, icons or pictures. It is not required to be double spaced. You must answer all sections.

All applicants should use the format outlined in this Appendix as an example and guidance to describe the organization's project.

FY2025/FY2026 NOFO ABSTRACT for:

The applicant, (insert name of applicant), if awarded, agrees to undertake the following activities in accordance with its FY2025/FY2026 application for funding in the amount of \$ under the Initiative- Component (if applicable) for a 24-month project with two separate consecutive performance and budget periods commencing (month/year) in the geographic area of .

(Insert Name of Applicant) **is/is not** (select one) a new FHIP applicant.

Award Description:

1. Purpose (up to 3,600 character limit)

2. Activities to be Performed (up to 4,900 character limit)

3. Expected Outcomes (up to 4,900 character limit)

4. Intended Beneficiaries (up to 3,600 character limit)

5. Subrecipient Activities, Or Indicate "None" if the applicant does not intend to award funds to subrecipients (up to 1,000 character limit)

Award Description Key Words/Phrases	Definitions
Purpose	A brief summary of how and where the award funds will or may be used.
Activities To Be Performed	A list of eligible activities that the applicant proposes to implement within the award's period of performance.
Expected Outcomes	A list of the proposed outcome or performance measures for the grant award.
Intended Beneficiaries	A list of intended eligible beneficiaries or protected classes to be targeted for the grant award.

Award Description Key Words/Phrases	Definitions
Subrecipient Activities	A list of eligible proposed activities that must be executed within the subaward's period of performance.