



NFMC ROUND 4

STREAMLINED APPLICATION GUIDE

FOR ALL QUALIFYING APPLICANTS:

INTERMEDIARIES, STATE HOUSING FINANCE AGENCIES AND

NEIGHBORWORKS ORGANIZATIONS

Applicants that qualify to use the Streamlined Application are current NFMC Program Grantees that have no uncured compliance findings as of 1/12/2010 AND are either:

- Round 2 Grantees that are at least 75% finished with Round 2 counseling (in dollars) by 1/12/2010 OR
- Round 3 Grantees that don't have Round 2 funds and are at least 25% finished with Round 3 counseling (in dollars) by 1/12/2010

Eligible applicants that do not fit either of these criteria may still apply, but must submit the complete application.

All eligible applicants were notified on January 20, 2010 that, due to scheduled system upgrades, GrantWorks and the NFMC applications will not be available on Saturday January 23rd and Saturday January 30th. Please plan accordingly.

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How to Use this Guide: Reminders and Tips

This Application Guide was created to provide NFMF Applicants with further support, direction, and examples for each factor. Based on our experience in previous NFMF Rounds, we offer you the following general reminders and tips:

- Refer to this guide frequently as it provides specific instructions and examples not available in the actual GrantWorks application. It is your key to submitting the best application possible.
- Assume reviewers know nothing about your organization, including its history, structure, experience, or partners. If you applied for NFMF funding previously, assume your application reviewers will be different in Round 4.
- If you are a current recipient of NFMF funds, provide relevant, detailed information and recent NFMF program/funding progress updates in the narrative sections of questions where requested and relevant.
- Any question marked with a red * is required by GrantWorks to have a response by the Applicant.
- For questions that require lengthy narrative responses, consider using all the space provided to you to create a complete, detailed answer. The number of characters available for each question is listed in GrantWorks.
- Take care to fully complete all data fields, specifically the counseling unit charts in Factors 3 and 4. Errors or omissions may substantially impact the quality of your application and ultimately any award amount.
- After completing your application, please review to ensure that responses throughout the application are consistent. When taken as a whole, the application must provide reviewers with clear and convincing evidence that Applicant has the capacity to fully expend Round 4 funds by December 31, 2010. Goals must be reasonable given the Applicant's past performance in NFMF (when applicable), planned staffing levels, and ability to oversee the compliance and quality of services provided by a network of Sub-grantees or Branches (when applicable).

If you encounter technical problems or need further clarification of any question that this guide is unable to resolve, please contact us at: nfmc@nw.org or 202-220-6314.

Applicant Certifications

Certifications: This section contains eligibility requirements all Applicants and their Sub-grantees or branches must meet in order to receive NFMC program funding. A check mark within each box signifies the Applicant agrees and certifies on behalf of their Sub-grantees or branches that each criterion has been met. You must certify that all are true in order to be eligible for funding.

ALL FIELDS ARE REQUIRED. While no points are awarded for this section, this is a threshold requirement. Applicants must certify all of the following are true in order to be considered for funding.

Definitions

Branch: “Branch” or “Branch Office” refers to an Applicant’s organizational and subordinate unit that is not separately incorporated or organized. A Branch or Branch Office must be in good standing under the laws of the state where it is authorized to do business and where it proposes to provide housing counseling services.

Sub-grantee: Sub-grantee refers to an organization to which the Grantee awards a sub-grant, and which is accountable to the Grantee for the use of the funds provided. A Sub-grantee may be separately incorporated or organized, but connected with an intermediary or State HFA. See Funding Announcement for additional details.

FIELDS 1-12 ARE REQUIRED BY ALL APPLICANTS. Fields 13-16 should be completed by State HFAs and HUD-Approved Intermediaries, as well as by NeighborWorks Organizations that will contract out some of their counseling services under the parameters described in the NFMC Round 4 Funding Announcement.

State HFAs, HUD-Approved Intermediaries, and NeighborWorks® Organizations certify that it and its Sub-grantees, branches, and/or affiliates (as applicable):

- 1. Is in good standing under the laws of the state in which it operates. *
- 2. Is authorized to do business in the states where it proposes to provide counseling services. *
- 3. Meets or exceeds HUD’s minimal standards for approval as a HUD housing counseling agency (<http://www.hud.gov/offices/hsg/sfh/hcc/hccprof13.cfm>). *
- 4. Has counseling offices and services that are accessible to people with disabilities. *
- 5. Has counselors fluent in the language that customers speak or will use interpreter services to ensure non-English speaking customers can obtain foreclosure intervention counseling. *

- 6. Will not permit discrimination against customers on the basis of their gender, race, religion, color, familial status, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation, or physical, mental, emotional or learning disability. *
- 7. Will adhere to the National Industry Standards Code of Ethics and Conduct and offer (as appropriate) the Minimum Standard Activities for Foreclosure Intervention and Default Counseling.*
<http://www.nw.org/network/nfmcpc/documents/NationalIndustryForeclosureCounselingStandards-FINAL.pdf>.
- 8. Currently uses CounselorMax, NStep, or Home Counselor Online **or** Applicant uses alternative client management system that will supply, electronically, the necessary client-level and aggregate reporting. NeighborWorks® will make available a template for data modification and submission. *
- 9. Agrees to comply with quality control, compliance and evaluation of the NFMC program through December 31, 2012. *
- 10. Certifies that the staff and volunteers who will provide foreclosure intervention counseling under NFMC have no conflict(s) of interest due to relationships with servicers, real estate agencies, mortgage lenders and/or other entities that may stand to benefit from particular counseling outcomes. *
- 11. Certifies that it has documented counseling capacity, outreach capacity, past successful performance and positive outcomes with documented counseling plans, including foreclosure mitigation counseling. *
- 12. Certifies that all NFMC clients will be owner-occupants of their homes at the time they receive counseling. *

Fields 13 – 16 are required by State HFAs and HUD-Approved Housing Counseling Intermediaries, and by NeighborWorks Organizations that will contract out some of their counseling services under the parameters described in the NFMC Round 4 Funding Announcement.

- 13. Certifies that all Sub-grantees, branches, or affiliates have the capacity to track and report both client level and aggregate data. Reporting must be done via electronic data files.
- 14. Has the capacity to furnish client level data and aggregate reports on NFMC program activity in electronic file format.
- 15. Has the capacity to pass through the NFMC funds received to their Sub-grantees, branches, or affiliates and will pass through the majority of funds for each draw within 30 calendar days of receipt of NFMC funds.
- 16. Agrees to collect and maintain a file of Certification Agreements and multiple NFMC Affiliation Disclosures of all Sub-grant.

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Factor 1: NFMC Grant Performance

1. Applicant Type. Check the type of entity that best describes the Applicant organization.

A. Type of Applicant: HUD-Approved Housing Counseling Intermediary

- Applicant is a HUD-Approved Housing Counseling Intermediary and all proposed Sub-grantees are either (a) HUD approved housing counseling agencies or (b) meet or exceed guidelines for HUD approval of housing counseling agencies.
<http://www.hud.gov/offices/hsg/sfh/hcc/hccprof13.cfm>; OR

B. Type of Applicant: State Housing Finance Agency (HFA)

- Applicant is a State Housing Finance Agency and can provide evidence of statutory authority to operate as a State HFA, to apply for and use funds, and to serve the entire state; OR

C. Type of Applicant: NeighborWorks Organization

- Applicant is a chartered member of the NeighborWorks network in good standing, defined as having a charter which is not provisional.

2. Audit. Upload your most recent independent financial audit, including the most recent OMB A-133 audit, if applicable. If the audit disclosed findings, please also upload your organization's Management Response Letter or Corrective Action Plan. If you have received an e-mail from NFMC stating that your most recent audit is already on file, upload a copy of that e-mail instead. NWOs, please upload a Word Document with a note saying that you are an NWO and have previously submitted your audit for review to the NeighborWorks Organizational Assessment Division.

3. Describe your organization's service delivery model. Refer to the Application Guide for specific items to include in this description. If you have made changes to your service delivery model since receiving NFMC funds, please indicate what changes have been made and how they have improved your organization's effectiveness and efficiency. *

Describe your organization's model for delivering foreclosure intervention counseling to homeowners. Be precise and fully describe the model, with emphasis on any aspects that may be unique. Existing NFMC grant recipients should give additional description on improvements or changes you have made and provide quantitative evidence on how those adjustments have improved your program's efficiency and/or effectiveness.

Whether you directly employ counselors in your organization, or have Sub-grantees/branches that work under a unified program delivery model, you should be certain to address each of the following topics in your description:

- a) **intake and triage procedures**, including expected response time to each homeowner’s request for counseling
- b) **method(s) of counseling used**, including face to face, phone, internet, email, and/or group education/workshops
- c) **counseling staff roles**, including if counselors or other staff that work with foreclosure counselors (intakers, negotiators) are full-time, part-time, or volunteer; and if they are fully dedicated to foreclosure services, or if counselors or other staff split their time between counseling and management or other programs
- d) **staffing models** – describe if counselors or other staff complete all portions of foreclosure counseling or if they are specialized in any way to handle only certain aspects of the process. (For example, some counselors do only intake and budget counseling, while other counselors are dedicated to securing outcomes and all negotiations with servicers)\
- e) **data collection**, consolidation, and reporting procedures, and
- f) **methods of communicating** with loan servicers during the counseling process.

If you have Sub-grantees or branches working under different service delivery models you should provide details on how you, as the Grantee, have provided and will provide future technical assistance (in areas a-f above) to ensure high counseling quality, efficiency, and effectiveness.

4. If you are currently using NFMC funds, by what date do you expect to fully expend all awarded funds (for Rounds 2 and 3)? Enter the date you anticipate exhausting all current NFMC Program funding. If you have already exhausted all funding, please enter the date you were informed by NFMC that you had reached 95% of your current round’s production.

5. If you previously received NFMC funds, describe any challenges you have experienced in implementing your previous NFMC award(s). Discuss plans or procedures you have put in place to address these challenges. Any challenge your organization experienced may be addressed in your response, but suggestions of possible topics include: staff turnover, hiring new staff, training new and existing staff, quality control, managing change in counseling demand, marketing and outreach, grant administration and reporting, data management, and reaching projected goals. Where possible and appropriate, quantify your challenges and the impact of the solutions you implemented. For example, instead of just citing problems with staff turnover, quantify the staff turnover and how it affected your counseling activity. When you describe the solutions you implemented, quantify recent staff turnover and progress towards achieving counseling goals.

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Factor 2: Capacity of Applicant for State HFAs & HUD-Approved Intermediaries Page 1

This page should only be completed by HFAs and Intermediaries. NWOs should skip this entire page.

1. For State HFAs & HUD-Approved Intermediaries, list the names and primary office locations of Sub-grantees, if any, you plan to **add** in Round 4 in the table below. List any new organizations not included in your past NFMC application(s) who will act as your Sub-grantee in NFMC Round 4.

Example:

Name	City	State
ABC Housing Counseling	Boise	ID
Equitable Resources Inc.	Seattle	WA

Click “save” before moving on to the next page.

Factor 2: Capacity of Applicant for State HFAs & HUD-Approved Intermediaries Page 2

This page should only be completed by HFAs and Intermediaries. NWOs should skip this entire page.

1. For State HFAs & HUD-Approved Intermediaries, list the names and primary office locations of Sub-grantees, if any, you plan to **subtract** from your current list of Sub-grantees, branches, and affiliates in Round 4 in the table below. In this table you will list any of your current NFMC Sub-grantees who will not be included in your Round 4 application.

Example:

Name	City	State
West Side Housing	Chicago	IL
Rochester Action Group	Rochester	NY

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Factor 2: Capacity of Applicant for State HFAs & HUD-Approved Intermediaries Page 3

This page should only be completed by HFAs and Intermediaries. NWOs should skip this entire page.

- 1. For State HFAs & HUD-Approved Intermediaries, discuss the impact your proposed changes in numbers of Sub-grantees will have on your ability to implement NFMC Round 4 and fully expend Round 4 funds by December 31, 2010.** Based on your responses to the questions in Factor 2, Pages 1-2, provide a detailed summary of how the changes in the number of Sub-grantees you will work with in Round 4 affects your capacity to successfully reach your counseling goals listed in Factor 3, Question 1. If you are adding Sub-grantees for Round 4, quantify the counseling production each Sub-grantee has achieved between January 1, 2009 and December 31, 2009. Identify the number of counselors employed by each Sub-grantee. Include a summary of the new counselors' experience and training with regard to foreclosure intervention counseling. It is particularly important to describe how changes in the number, size or scale of your Sub-grantees relate to your proposed Round 4 counseling goals. For example, if you plan to add two Sub-grantees that are small, neighborhood based organizations with 2-3 counselors each, this is likely to have a less dramatic impact on your counseling goals than if you added two large organizations with 15-20 counselors that cover a broad service area.

If, on the other hand, you are proposing to have fewer Sub-grantees in Round 4, provide evidence that your remaining Sub-grantees have the capacity to meet your Round 4 Goals. If relevant, discuss the capacity (in terms of experience and number of counselors) of the Sub-grantee(s) you are subtracting.

If you propose no changes to number of Sub-grantees, provide evidence that the goals are attainable without making changes to the number of Sub-grantees.

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Factor 2: Capacity of Applicant for NeighborWorks Organizations Page 4

This page should only be completed by NWOs. HFAs and Intermediaries should skip this entire page.

- 1. For NeighborWorks® Organizations, indicate the number of full-time equivalent (FTE) foreclosure counselors and other foreclosure staff (e.g., intake workers, negotiators, etc.) who are currently working for the Applicant organization and would be working on the NFMC program.** Simply list the number of counselors in the first column and administrative support and specialized technicians in the second column. Other foreclosure staff may include team leaders, managers, or supervisors, and negotiators, as well as administrative assistants.

Number of Foreclosure Counselors	Number of Other Foreclosure Staff (not including counselors)
3 FTE	1 FTE Negotiator 1 FTE Counseling Program Manager .5 FTE Intake Worker

2. For NeighborWorks® Organizations, indicate the number of full-time equivalent (FTE) foreclosure counselors and other foreclosure staff (e.g., intake workers, negotiators, etc.) who will be working for Applicant organization, should it receive its full request of NFMC Round 4 funds in addition to those listed above. Start with your figures from Question 1 above and add to them any additional FTE counselors or other foreclosure-dedicated staff you plan to add before December 31, 2010, if awarded Round 4 funds. In the example below, the Applicant is hiring 1 FTE Counselor (3+1=4) and .5 FTE foreclosure staff (2.5+.5=3 FTE). If you are planning to subtract counselors or other foreclosure staff, please reflect that in the numbers below as well.

Number of Foreclosure Counselors	Number of Other Foreclosure Staff (not including counselors)
4 FTE	3 FTE

3. For NeighborWorks® Organizations, discuss the impact your proposed changes in numbers of counselors and foreclosure staff will have on your ability to implement NFMC Round 4 and fully expend Round 4 funds by December 31, 2010. Based on your responses to the questions in Factor 2, Page 4, Questions 1-2, provide a detailed description of how these changes in the number of counselors and other foreclosure staff will affect your capacity to successfully reach your Round 4 Goals, as listed in Factor 3, Question 1. If you propose to add staff with Round 4 funding, provide specifics on how those staff will be utilized and affect your production. If applicable, provide information about the primary tasks each new FTE will be given. For example, if a full-time intake specialist is proposed to assist with fielding all phone calls, conducting intake, and scheduling counseling appointments, you would describe that process and how it will improve your ability to counsel more homeowners per day and reach your Round 4 goals by December 31, 2010. If you are planning to work with fewer counselors or staff, provide evidence that your organization will still be able to meet its proposed goals.

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Factor 3: Proposed Counseling Services

NFMC is concerned about the reasonableness of your counseling goals, your capacity to oversee these funds, your network of Sub-grantees and branches (if applicable) and your demonstrated ability to provide the highest quality foreclosure intervention counseling services. Your projected NFMC Round 4 goals (listed in Question 1 below) will determine the maximum counseling award you can receive.

In the table below (Question 1) please fill out the estimated number of foreclosure intervention customers that will be served by all branches or Sub-grantees.

Notes: 1) NFMC funds must be used ONLY to counsel homeowners in their primary residence. Counseling completed with owners regarding second homes or investment properties may not be funded using NFMC program grants; 2) no funds

made available under NFMC may be provided directly to lenders or homeowners to discharge outstanding mortgage balances or for any other direct debt reduction payments.

Definitions of Counseling Levels

Counseling can include a range of activities depending on the client's financial situation and the severity of the mortgage delinquency. Many clients in the early stages of delinquency may benefit from brief counseling sessions that result in an Action Plan they can follow to get back on track and prevent foreclosure. More complex workouts, sometimes involving negotiations with mortgage lenders or servicers, require staff with additional expertise and will take longer to resolve. Recognizing this, NeighborWorks has developed a tiered structure for defining and estimating the cost of counseling activity, as described below. For the purpose of projecting counseling budgets, the value of Level One counseling has been set at \$150 and Level Two at \$300. Definitions of counseling levels can be found in the Funding Announcement under "Eligible Activities". Note: NFMC Round 4 does not include a Level Three counseling designation. All clients previously reported as Level Three will now be considered twice – once at Level One and once at Level Two.

“Level One” Counseling: To qualify for a Level One payment (\$150), a counseling agency will be required to complete all five of the following steps:

1. Organization must conduct an intake including client name and address, basic demographic information, lender and loan information, and reason for delinquency. The National Industry Foreclosure Counseling Standards provide guidance on what should be included in an Intake Form (See Exhibit 5 of this document and www.nw.org/nfmc). It is recommended, but not required, that contact information for one additional person be collected at intake in the event that client moves or is otherwise unable to be reached following initial intake.
2. Organization shall collect a signed authorization form from the client or have other legally-permissible client authorization on record that will allow organization to (a) submit client-level information to the data collection system for this grant, (b) open files to be reviewed for program monitoring and compliance purposes, and (c) conduct follow-up with client related to program evaluation. Clients may opt-out of (c) above only, but proof of this opt-out must be retained in the client's file. Organization must also allow client access to its privacy policy statement. NeighborWorks will make a template authorization form available for Grantees to modify for their own use if they do not already have such a form. Alternatively, Grantees may incorporate the language above into their existing authorization forms.
3. Organization must develop a budget for the client based on client's oral representation of their expenses, debts, and available sources of income.

4. Organization must develop a written Action Plan for follow up activities to be taken by the client and review this Action Plan with the client. The National Industry Foreclosure Counseling provide guidance on what should be included in an Action Plan (See Exhibit 5 and www.nw.org/nfmc). When developing this action plan, it is expected that the counselor will do a comprehensive analysis of the homeowner's situation and recommend the best plan of action. If the homeowner seeks counseling to determine whether they qualify for the *Making Home Affordable* Program, the counselor must work to determine the homeowner's eligibility before completing the Level One session. If the homeowner seeking counseling does not ask about the program, it is expected that the Level One session will include a screening for eligibility. Documentation that a screening occurred must be included in the client file.
5. Organization must determine and document if client is eligible for a *Making Home Affordable* Program refinance or modification.
 - *Refinance*. Organization must determine and document eligibility by asking client if: (a) client is the owner occupant of a one- to four-unit home; (b) client's loan is owned or guaranteed by Fannie Mae or Freddie Mac – counselor will verify this by checking the GSE's web look-up tools; (c) client is current on mortgage (client hasn't been more than 30 days late on mortgage payment in the last 12 months, or, if client has had the loan for less than 12 months, he/she has never missed a payment); (d) the amount client owes on the first mortgage is 125% or less of the house's current value; (e) client has income sufficient to support the new mortgage payments; and (f) the refinance improves the long-term affordability or stability of the loan.
 - *Modification*. Organization must determine and document eligibility by asking client if: (a) the mortgage loan is a first lien mortgage loan originated on or before January 1, 2009; (b) the mortgage has not been previously modified under the Home Affordable Modification Program (HAMP); (c) the mortgage loan is delinquent or default is reasonably foreseeable; (d) the property securing the mortgage loan is not vacant or condemned; (e) the mortgage loan is secured by a one- to four-unit property, one unit of which is the borrower's principal residence; (f) client's current monthly mortgage payment ratio is greater than 31%; and (g) the current unpaid principal balance of the mortgage is less than \$729,750 for a one-unit property, \$934,200 for a two-unit property; \$1,129,250 for a three-unit property; and \$1,403,400 for a four-unit property.
 - *FHA Loans*. Organization must determine and document eligibility by requesting information and analyzing if: (a) the client is the owner of a one- to four-unit home; (b) the client is less than 12 payments behind on their mortgage; (c) client has income sufficient to support the new mortgage payments; and (d) with the modification, the client's front end DTI will be more than 31% and their back end DTI will be less than 55%.

When billing for Level One activities, all 5 of these completed documents must be in client file: intake, authorization form, budget, Action Plan, and MHA eligibility determination. Intermediaries and State HFAs are responsible for ensuring proper documentation exists in client files at each of their Sub-grantee or Branch offices.

“Level Two” Counseling: To qualify for a Level Two payment (\$300), a counseling agency will be required to complete the following four steps:

1. Engage in budget verification during which the counselor reviews documented evidence provided by the client to establish true debt obligations (e.g., credit report), monthly expenses (e.g., monthly bills and banks statements) and spending patterns, and realistic opportunities for income (e.g., returns and pay stubs).
2. If not already on file, organization shall collect a signed authorization form from the client or have other legally-permissible client authorization on record that will allow agency to (a) submit client-level information to the data collection system for this grant, (b) open files to be reviewed for program monitoring and compliance purposes, and (c) conduct follow-up with client related to program evaluation. Clients may opt-out of (c) above only, but proof of this opt-out must be retained in the client’s file. Organization must also allow client access to its privacy policy statement. NeighborWorks will make a template authorization form available for Grantees to modify for their own use if they do not already have such a form. Alternatively, Grantees may incorporate the language above into their existing authorization forms.
3. Steps to obtain a solution outlined in the written Action Plan are taken and documented using counseling notes that indicate date counseling occurred. This could include but is not limited to the following:
 - a. Draft and submit to the servicer a hardship letter that describes the client’s situation, reason for delinquency, factors that should be considered when developing a workout plan, and an estimate of the housing cost the client can afford to pay;
 - b. Document an attempt to contact the servicer or lender and, if a workout is possible, fill out and submit forms required by the servicer to move forward with a workout plan, loan modification or other available program. NeighborWorks will endeavor to post e-mail contact information for servicers who have made such information available at www.nw.org/nfmc so documentation of attempts to reach servicers is easily captured;
 - c. Complete and submit application for local resource options including refinance programs or rescue funds; and
 - d. Assist in situations where client elects to pursue sale options.
4. Close-out documentation is completed. For purposes of this grant, “close-out documentation” refers to the documentation of steps taken in #3 above in order to report this client as having received Level Two counseling. All files need to contain reason for close out and, if applicable, any documentation demonstrating solution. Client data may be uploaded into the data collection system before an outcome is reached, as long as close-out documentation for NFMC reporting purposes is in client file.

When billing for Level Two activities, all of these completed documents must be in client file: authorization form, verified budget, documentation of steps taken based upon Action Plan, and close-out documentation. Intermediaries and State HFAs are responsible for ensuring proper documentation exists in client files at each of their Sub-grantee or Branch offices.

“Level Three” Counseling: This level of counseling is not an option in Round 4. If you have questions, please contact NFMCC. All clients previously reported as Level Three will now be considered twice – once at Level One and once at Level Two.

Making Home Affordable/Post-Mitigation Counseling

In addition to the funding categories described above, the National Foreclosure Mitigation Program allows Grantees to use up to 30% of Counseling Awards to fund “Level Four,” or post-mitigation Making Home Affordable, counseling. Borrowers who qualify for Making Home Affordable loan modifications but have back end debt-to-income ratios at or above 55% will receive trial loan modifications from participating servicers and be referred by the servicers to a HUD-approved housing counseling agency or NFMCC Program participating agency. A detailed protocol describing the required components of this counseling is found at <http://www.hud.gov/offices/hsg/sfh/hcc/hcprotocol.pdf> and further information is in the Round 4 Funding Announcement.

Counseling Table Instructions

In this section Applicants are asked to indicate the number of Level One and Level Two counseling customers they (or their Sub-grantees or branches) will provide between December 1, 2009, and December 31, 2010. **Simply click on the “save” button after you have entered your data in each table to view such auto-calculated fields.** Please do not leave any cell blank, but rather enter “0” in cells where your answer is “zero” or “none.”

1. NFMCC Round 4 Goals * For the New Goal section Applicants will need to indicate the number of “units” they propose to counsel if awarded NFMCC program funding in Round 4. For this section, only indicate those additional counseling numbers. Figures in this table will be used later in this factor to determine your maximum eligible counseling award amount.

Example: Intermediary X proposes, with the additional aid of NFMCC Round 4 funds, that its 7 Sub-grantees **combined** could counsel an additional 2,500 clients between December 1, 2009 and December 31, 2010. The breakdown by counseling level would be as follows: Level One = 1,500 and Level Two = 1,000. Intermediary X presents these additional numbers in the quarterly format below:

NFMC ROUND 4 GOALS										
Number of Customers Receiving Foreclosure Counseling with NFMC funds										
Click on the Save button to see the totals										
	“Level One” Counseling					“Level Two” Counseling				
	12/1/09 – 3/31/10	4/1/10 – 6/30/10	7/1/10 – 9/30/10	10/1/10 – 12/31/10	Total	12/1/09 – 3/31/10	4/1/010 – 6/30/10	7/1/10 – 9/30/10	10/1/10 – 12/31/10	Total
1. Round 4 Goal: Foreclosure counseling projected during the time period 12-1-09 to 12-31-10 <u>using NFMC Round 4 award only.</u> * NOTE: Your total NFMC Round 4 Goal must equal your overall total of customers listed in Factor 4.	350	350	400	400	1,500	250	250	250	250	1,000

TOTAL NFMC ROUND 4 GOAL: 2,500

Click “save” now to populate the “total” columns of the table and the total NFMC Round 4 goal and the maximum eligible counseling award in question 2 below.

2. Maximum Eligible Counseling Award

For the maximum eligible counseling award GrantWorks will calculate the Applicant’s counseling level totals presented in Factor 3, Question 1 – Round 4 Goal – and multiply by the corresponding cost set for each Level (Level One x \$150 and Level Two x \$300.) Once all level totals have been calculated at the appropriate counseling rate, all levels will be added by GrantWorks to determine the maximum NFMC counseling award your organization is eligible to receive. The example below is based on the figures entered in the sample chart for Intermediary X in Question 1 above.

Maximum Eligible Counseling Award - Round 4		
Click on the Save button to see the calculated MAXIMUM ELIGIBLE COUNSELING AWARD (Round 4)		
	“Level One” Counseling	“Level Two” Counseling
2. Calculated Maximum Eligible NFMC Round 4 funds to be awarded from the NFMC Round 4 Goal numbers in Question 1 above.	Level One NFMC Round 4 Goal (from Question 1) X \$150	Level Two NFMC Round 4 Goal (from Question 1) X \$300
MAXIMUM ELIGIBLE COUNSELING AWARD PER LEVEL	\$225,000	\$300,000
TOTAL MAXIMUM ELIGIBLE COUNSELING AWARD ROUND 4	\$525,000	

NOTE: The maximum allowable grant request for this application is \$8,910,000 million (of which \$7,016,000 million could be utilized for counseling) and the minimum allowable grant request is \$50,000 (of which, for HFAs and Intermediaries, \$39,370 could be utilized for counseling; and for NWOs, \$41,670 could be utilized for counseling – this difference is because NWOs are not eligible for Operational Oversight funds). If the amount listed here exceeds \$7,016,000 million, you must reduce your Round 4 Goal figures in Factor 3, Question 1. If the amount listed here is less than \$39,370 if you are a HFA or Intermediary, or \$41,670 if you are a NWO, you must add to your Round 4 Goal figures in Factor 3, Question 1. Click “save” once you have edited your projected counseling goals to see if your total maximum eligible counseling award is now within the minimum and maximum limits set for this application. If your request exceeds \$8,910,000 million, or is less than \$50,000 your application will not be eligible for funding. An error check will not allow you to submit an application that does not fall within this range.

Factor 3: Proposed Counseling Services Page 2

3. If you received previous NFMC funds, do you expect to complete your total NFMC goals (Rounds 2 and 3) as listed in your Grant Agreement before June 30, 2010? Respond “Yes” if you believe, based on your most recent production and

remaining counseling units, you will reach your goal by June 30, 2010. Be realistic in your estimate and base the date on your most recent monthly counseling unit production. If you answer “No” to this question, complete Question 3A. If “Yes”, proceed to Question 4.

3A. If “No”, explain why additional NFMC Round 4 funds are necessary and how you will ensure all Round 4 funds are fully expended by December 31, 2010. The official end date of Rounds 2 and 3 is June 30, 2010. Extensions may be granted by NFMC on Round 3 funds. If you were to receive Round 4 funds, those funds would be available retroactively to December 1, 2009 and need to be fully expended by December 31, 2010. In your response you must provide a clear and convincing case first for the need for additional funds in Round 4 (if you have funds remaining), and provide quantitative evidence that you will be able to expend all awarded funds by their proposed deadlines.

PROGRAM-RELATED SUPPORT

Refer to the following list in answering Questions 4-6. Examples of how Program-Related Support may be used include (but are not limited to) the following:

- Establishing a triage system that makes more effective and efficient use of counseling time so counselors are not scheduling and reserving time with clients seeking help with situations not related to mortgage and home foreclosure. Triage can also ensure that clients are better prepared for the counseling session – they have gathered documents and information, for example.
- Outreach to delinquent clients, especially in areas of greatest need. The earlier a delinquent homeowner reaches out for assistance, the more probable the success. Outreach strategies to encourage delinquent homeowners in Applicant’s communities to come for assistance well before the foreclosure notice is received are encouraged.
- Group orientation and education sessions to help use counseling time more effectively. Registering attendees, preparing for and delivering these sessions are all eligible uses.
- Infrastructure development and communication
- Improving Applicant capacity and infrastructure for tracking and reporting data
- Costs related to hiring, orienting, and training new counseling staff
- Purchasing or leasing equipment and software for counselors
- Collecting data and preparing quarterly reports and draw requests
- Quality control of the counseling function
- Outreach and communication on preventing rescue or loan modification scams

4. **Program-Related Support amount Applicant is requesting based on the Round 4 Counseling Goals; this is 20% of your Round 4 Counseling Goal from Factor 3, Question 1. **Simply hit the save button** to prompt GrantWorks to populate the amount that you are eligible to receive, based upon your total maximum eligible counseling award.**

5. **Describe how your organization will use the Program-Related support to achieve your projected Round 4 Counseling Goals (from Factor 3, Question 1) under NFMC Round 4. * Describe clearly how your requested Program-Related Support amount will be used to achieve Round 4 counseling goals. Show how your plan will increase the effectiveness and efficiency of your foreclosure counseling program. For example, upgrading technology might improve the speed and efficiency of data entry, or funds invested in training might help new staff improve the quality and effectiveness of their counseling. **Please also provide major budget line-items and costs that are related to your proposed plan.** These funds are not intended to be indirect or administrative fees; rather, they are meant primarily to support direct costs associated with increasing the effectiveness and efficiency of your foreclosure counseling program. If you plan to use some of your Program-Related Support to cover additional Level One or Two counseling please include that as a line item in your budget.**

6. ***For State HFAs and HUD-Intermediaries only*, if you intend to retain any Program-Related Support funds:**
 - 6A. **Enter the percentage of funds you will retain. Note: The retained amount cannot exceed 50% of the Program-Related Support amount calculated in Question 4 above.** This is the percentage of any Program-Related funds you, as the Applicant, plan to retain to cover appropriate costs. State HFAs and Intermediaries that have separately-incorporated Sub-grantees must pass through the full awarded percent of Program-Related Support to their Sub-grantees. It is expected that these funds will be used to increase efficiency of foreclosure counseling. If you do not intend to retain any of these funds, enter "0".

 - 6B. **This is the total amount you are eligible to retain for the Program-Related Support funds.** This number will be automatically populated once you **click "save"** based upon the percentage you enter in Question 6A.. This calculation shows the maximum amount an Intermediary or HFA can retain at the Intermediary/HFA level. The Grantee may elect to retain less than this amount, but not more.

7. ***For State HFAs and HUD-Intermediaries only*: Operational Oversight amount Grantee is requesting based upon Round 4 Counseling Goal (this is 7% of your Round 4 maximum eligible counseling award from Factor 3, Question 2 for the first \$2.5 million and 5% thereafter) **Simply click the save button** to prompt GrantWorks to populate the amount that you are eligible to receive, based upon your total maximum eligible counseling award.**

8. **For State HFAs and HUD-Intermediaries only:** How you will use Operational Oversight funds to administer NFMC Round 4 funding. Provide specific details on how the Operational Oversight funds you would receive would be used by you to execute the required client-level data collection, tracking, and reporting activities required in NFMC Round 4. Please **include major budget line items** for the Operational Oversight funds requested. If you plan to use some of your Operational Oversight funds to cover additional Level One or Two counseling please include that as a line item in your budget.

Factor 4: Proposed Geographic Service Areas

Important instructions that apply to all portions of Factor 4

Factor 4 will not be given a numeric score during the review process. However, information provided here will be used to determine geographic coverage and will help insure that required portions of the funds are awarded in defined areas of greatest need.

Note: For all of Factor 4, do not include in your figures any counseling units already funded through a previous NFMC award. The totals for all the questions in Factor 4 should equal the total number of counseling units you will enter into Factor 3, Question 1 (Round 4 Goal).

Applicants should check mark any of the service areas in Factor 4 (MSA and/or Rural) where you propose to provide NFMC Round 4 counseling and indicate how many customers you plan to serve in each area.

AS YOU COMPLETE THIS FACTOR, PLEASE REMEMBER TO SAVE YOUR DATA ENTRY AFTER EACH COMPLETED QUESTION. PLEASE BE PATIENT AND WAIT FOR THE GREEN BAR ON THE BOTTOM OF YOUR SCREEN TO COMPLETELY SAVE OR DISAPPEAR BEFORE MOVING ON. FAILURE TO DO SO MAY RESULT IN LOST DATA.

Factor 4: Proposed Service to MSAs of Greatest Need

1. Select the Metropolitan Statistical Areas (MSAs) that are defined by NFMC as areas of greatest need that you propose to serve in NFMC Round 4. Check all that apply. New counseling goals proposed under NFMC Round 4 should not include any counseling for which you were awarded funding under previous NFMC grant rounds. They should also not include proposed counseling funded by sources other than NFMC Round 4.

Estimate the total number of units of counseling you expect to deliver in each MSA that you check. Note that if a service area is checked, the system will require you to enter an estimate of counseled customers.

Example: Metropolitan Area	State	Estimate the total # of customers you expect to counsel in each MSA
<input checked="" type="checkbox"/> Bakersfield	CA	300
<input type="checkbox"/> El Centro	CA	
<input type="checkbox"/> Fresno	CA	
<input checked="" type="checkbox"/> Los Angeles-Long Beach-Santa Ana	CA	1000
<input type="checkbox"/> Madera	CA	
<input type="checkbox"/> Merced	CA	

Factor 4: Proposed Service to MSAs NOT in Areas of Greatest Need

2. Select the MSAs that are NOT defined by NFMC as areas of greatest need that you propose to serve in NFMC Round 4. Check all that apply. New counseling goals proposed under NFMC Round 4 should not include any counseling for which you were awarded funding under previous NFMC grant rounds. They should also not include proposed counseling funded by sources other than NFMC Round 4.

Estimate the total number of units of counseling you expect to deliver in each MSA that you check. Note that if a service area is checked, the system will require you to enter an estimate of counseled customers. At the end of the chart there is an option for Applicants to enter "other." Use this option only if you are serving a tribal land that is not included in the MSA/rural definition. Do not use this section to list an area that is included in a larger MSA or rural area of a state. If you have questions about which MSA a particular service area falls into, please contact NFMC at nfmc@nw.org for guidance.

Example: Metropolitan Area	State	Estimate the total # of customers you expect to counsel in each MSA
<input type="checkbox"/> Anchorage	AK	
<input type="checkbox"/> Fairbanks	AK	
<input checked="" type="checkbox"/> Auburn-Opelika	AL	100
<input type="checkbox"/> Huntsville	AL	
<input checked="" type="checkbox"/> Hot Springs	AR	300

Click "save" before moving on to the next page.

Factor 4: Proposed Service to Rural Areas of Greatest Need

3. Select the states with rural areas that are defined by NFMC as areas of greatest need that you propose to serve in NFMC Round 4. Check all that apply. New counseling goals proposed under NFMC Round 4 should not include any counseling for which you were awarded funding under previous NFMC grant rounds. They should also not include proposed counseling funded by sources other than NFMC Round 4.

Estimate the total number of units of counseling you expect to deliver in the rural areas of each state that you check. Note that if a service area is checked, the system will require you to enter an estimate of counseled customers.

EXAMPLE	States where rural areas ARE defined as Areas of Greatest Need	Estimate the total number of customers you expect to counsel in each rural area of the state
<input checked="" type="checkbox"/>	Alabama	425
<input type="checkbox"/>	Arizona	
<input type="checkbox"/>	Arkansas	
<input type="checkbox"/>	California	
<input type="checkbox"/>	Connecticut	
<input type="checkbox"/>	Delaware	
<input checked="" type="checkbox"/>	Florida	575

Click “save” before moving on to the next page.

Factor 4: Proposed Service to Rural Areas NOT in Areas of Greatest Need

4. Select the states with rural areas that are NOT defined by NFMC as areas of greatest need that you propose to serve in NFMC Round 4. Check all that apply. New counseling goals proposed under NFMC Round 4 should not include any counseling for which you were awarded funding under previous NFMC grant rounds. They should also not include proposed counseling funded by sources other than NFMC Round 4.

Estimate the total number of units of counseling you expect to deliver in the rural areas of each state that you check. Note that if a service area is checked, the system will require you to enter an estimate of counseled customers.

EXAMPLE	States where rural areas are NOT defined as Areas of Greatest Need	Estimate the total number customers you expect to counsel in each rural area of the state
<input checked="" type="checkbox"/>	Alaska	250
<input type="checkbox"/>	Colorado	
<input type="checkbox"/>	Idaho	
<input type="checkbox"/>	Kansas	
<input type="checkbox"/>	Massachusetts	
<input checked="" type="checkbox"/>	Missouri	250

Click “save” before moving on to the next page.

Factor 5: Targeted Outreach

Outreach to minority and low-income homeowners and zip codes

Please note questions 1 and 2 specifically speaks of zip codes that you may target and serve, compared to Questions 3 and 4 which address service to homeowner groups. For example, a state HFA may have decided to attempt to reach African American homeowners statewide by running ads on two radio stations that serve that audience. On the other hand, for Questions 1 and 2, the state HFA may elect to target two zip codes in the urban core, where foreclosure rates are twice the state average, by advertising in community newspapers, holding foreclosure fairs in the community center, or doing targeted post card mailers.

For Questions 1-4 simply enter the percentage of your counseling units for NFMC Round 4 that apply. Any number from 0 to 100 is acceptable. Your totals for Questions 1-4 (inclusive) may exceed 100%. **The percentage of units of counseling you commit to will be reflected in your Grant Agreement and will be a requirement for draw payment, so please only enter a percentage you are comfortable that your organization can achieve.**

1. If you were to receive NFMC Round 4 funding, what percentage of your total counseling units do you commit to provide to households living in low-income zip codes? Follow this link to determine which zip codes are majority low-income: <http://www.nw.org/network/nfmcp/zipcodes.asp> * If you do not intend to provide counseling to low-income zip codes, enter "0".
2. If you were to receive NFMC Round 4 funding, what percentage of your total counseling units do you commit to provide to households living in minority zip codes? Follow this link to determine which zip codes are majority minority: <http://www.nw.org/network/nfmcp/zipcodes.asp> * If you do not intend to provide counseling to minority zip codes, enter "0".
3. If you were to receive NFMC Round 4 funding, what percentage of your total counseling units do you commit to provide to low-income homeowners? * If you do not intend to provide counseling to low-income homeowners, enter "0".
4. If you were to receive NFMC Round 4 funding, what percentage of your total counseling units do you commit to provide to minority homeowners? * If you do not intend to provide counseling to minority homeowners, enter "0".

Click "save" before moving on to the next page.

Factor 6: Match

FACTOR 6 WILL NOT BE GIVEN A NUMERIC SCORE. HOWEVER, MATCHING FUNDS MUST BE PROJECTED AT THE REQUISITE LEVELS, AND FUNDS CANNOT BE DRAWN DOWN UNTIL EVIDENCE OF MATCH FUNDS EXPENDED OR COMMITTED, PROPORTIONATE TO THE DRAW REQUEST, IS DOCUMENTED.

Recognizing the limits of time and financial resources, match requirements are defined as follows: Applicants must provide a 20% match for the first \$500,000 in funding received from the NFMC Program. For funding in excess of \$500,000, the required match rate drops to 10%. For example, an Applicant applying for \$1 million in funds would be required to demonstrate a match of \$150,000 in cash and/or in-kind resources.

Please read these Match guidelines and rules before completing Question 1.

- Match can be cash or in-kind (e.g., staff time, office space, volunteer time, donated equipment, etc.). In-kind valuation will be considered consistent with requirements for other federal grant programs. Guidance is posted at www.nw.org/nfmc.

- Applicant match must be related to Applicants' foreclosure mitigation program. This program must include foreclosure intervention counseling, but may also include such activities as triage, outreach, or mortgage workout funding (both grants and loans), plus any administrative or overhead expenses associated with the program.
- Match need not be new resources generated for this grant program, but must be related to foreclosure counseling rather than the Applicant's general housing counseling program.
- Other federal funds, with the exception of Community Development Block Grant (CDBG) Funds, may not be counted toward match requirements. Examples of federal funds ineligible for use as match include (but are not limited to) other HUD Housing Counseling funds, all previous NFMC awards (including Legal Assistance), HOME Funds, Neighborhood Stabilization Program, and grants awarded by NeighborWorks to its chartered members from Congressionally appropriated dollars.
- If grantee uses non-restricted net assets or retained earnings as sources of match funds, Grantee must retain back-up documentation that these funds are available and are credited to the foreclosure counseling budget. Examples of supporting documentation are financial records (i.e. profit and loss & balance sheet statements, management accounts, approved budget clearly showing NFMC match funds, etc.); signed minutes of meetings committing these funds, Board or agency resolutions and third-party confirmations.
- Examples of funds that are eligible for match include (but are not limited to): fees received from servicers or lenders for providing foreclosure counseling to clients not counted under this program, or for counseling costs over and above what NFMC pays for; funds received to capitalize mortgage rescue funds; Community Development Block Grant (CDBG) funds; foundation and corporate grants received for operating a foreclosure counseling and mitigation program; municipal, county, or state grants for operating a foreclosure counseling and mitigation program (as long as the funds do not have a federal source); contract income; and unrestricted funds or net assets dedicated towards the foreclosure program.
- The match "window," or period within which the match must be expended or raised, extends from June 30, 2009 to December 31, 2010. Any expenditures related to the Applicants' foreclosure mitigation program that occur between June 30, 2009 and the date award funds are received are eligible to be counted toward the match as long as they are not counted for match for NFMC Round 1, Round 2, Round 3, or Legal Assistance Funds. Funds raised before this time period can be counted toward match as long as they will be expended during the time frame June 30, 2009 – December 31, 2010.
- Applicants need not have all the match committed at the time of application, but can include funds they expect to raise during the year and any qualifying funds they have expended since June 30, 2009. Once grant funds are awarded, draws will be contingent upon Grantees' ability to demonstrate at least the amount of match proportional to the draw amount, including the initial disbursement, has been committed or expended.

1. In the table below, itemize your projected match for NFMC Round 4 Grant Period.* Please indicate the source of funds, whether they are in-kind or cash, and whether they are expended, committed, pending, or anticipated.

Example: HFA Applicant requests \$317,500. The match requirement of 20% of \$317,500 is met through a match of non-federal funds totaling \$87,500 (or 27% of the NFMC amount requested, which exceeds the threshold match requirement of 20%). **Make sure the total match funds you itemize meets or exceeds the match required should your application be fully-funded.**

MATCH (Cash and In-Kind)

Note: In-kind and cash match resources must be expended between June 30, 2009 and December 31, 2010. Funds raised before this time period can be counted toward match as long as they will be expended between June 30, 2009 and December 31, 2010. Funds raised as match for NFMC Rounds 1, 2, or 3, or for NFMC Legal Assistance funding, cannot be counted as match towards NFMC Round 4.

Enter the Name of the Source	Enter the Amount	Select the Description Source (cash, in-kind)		Select the Funding Status
Smith and Jones Regional Bank	\$2,500	<input checked="" type="radio"/> Cash	<input type="radio"/> In-kind	Expended
Housing Preservation Fund	\$25,000	<input checked="" type="radio"/> Cash	<input type="radio"/> In-kind	Committed
FHP Society	\$5,000	<input checked="" type="radio"/> Cash	<input type="radio"/> In-kind	Anticipated
Volunteer Brigade of Small Town, USA	\$5,000	<input type="radio"/> Cash	<input checked="" type="radio"/> In-kind	Pending
State Housing Finance Agency	\$50,000	<input checked="" type="radio"/> Cash	<input type="radio"/> In-kind	Committed
Total Match	\$87,500			
Funds Requested from NFMC	Amount			
Total Maximum Eligible Counseling Award	\$250,000			
Total Program-Related Support Amount Requested	\$50,000			
<i>For HFAs and HUD Intermediaries Only</i>				
Total Operational Oversight Amount Requested	\$17,500			
Total NFMC Amount Requested	\$317,500			
This Amount will be displayed on your Requested Amount page				

Click “save” before moving on to the next page.

Factor 6: Match Waiver

- If you are requesting a match waiver, list your County or Tribal land level service areas in the table below. Tribal land is defined for these purposes as Federal or state-recognized American Indian/Alaska Native Areas and Native Hawaiian Homeland Areas. The match requirement may be waived for counseling delivered in areas where either the local poverty rate or the local unemployment rate is greater than 150% of the national rate. When requesting waivers, Applicants must use data that is no older than 2008. Applicants can find unemployment rates from the Bureau of Labor Statistics at www.bls.gov/lau/#data and poverty rates from the U.S. Census Bureau at www.census.gov/hhes/www/saipe/county.html.

Waivers will be granted on a county-by-county basis for counties that have rates of poverty or unemployment greater than 150% of the national rate. In the event that a service area is smaller than the county, Applicants may apply for a match waiver for the smaller geographic area. The Applicant must have a physical presence (such as an office) in the area for which the waiver is requested and must state their estimated counseling volume in that area. Match waiver decisions will consider the volume of counseling expected by the Applicant in that county or area compared to their Total Counseling Goals. Waivers will be granted proportionately and will be detailed in the Grant Agreement.

If you are requesting a match waiver for a service area smaller than county level, you must fill out the excel spreadsheet titled “Match Waiver Request – smaller than County Level” under the “For All Eligible Applicants” section of www.nw.org/nfmc and e-mail it to nfmc@nw.org before 8:00PM EST on February 9, 2010.

Name of County or Tribal Land, and state	Is there a Physical Sub-grantee Presence?	Projected # of Clients to be Counseled in this Area	Does this area have an unemployment rate greater than or equal to 15% (150% of national unemployment rate)?	Does this area have a poverty rate greater than or equal to 19.8% (150% of national poverty rate)?	Please list your data sources for the Unemployment and Poverty questions.
<i>Examples only:</i> Swaim County, PA	<input checked="" type="checkbox"/>	25	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Poverty: Census (2005) unemployment: Bureau of Labor Statistics (2005)
American Indian Reservation, DE		10	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Poverty: Census (2005) unemployment: Bureau of Labor Statistics (2005)

The totals in column C, *Projected # of Clients to be Counseled in this Area*, should be a subset of the NFMC Round 4 goals listed in Factor 3. When completing this section, please refer to Factor 4 to ensure you are not asking for a waiver for more units than you are proposing to provide in the identified service area.

Match waivers will be awarded proportionate to the counseling level you listed in your Round 4 Goals specified in Factor 3 unless you instruct us otherwise in writing at the time of your application.

Click “save” once you have filled in this chart if you are requesting a match waiver.

Application Submission

Before submitting, please follow these important steps to ensure your application is not submitted with errors.

1. Check to make sure there are no errors on the pages – an error is indicated with an exclamation point in front of a yellow triangle background. If all of your pages are labeled with a green checkmark, there are no errors on your pages. If you see an exclamation point instead of green checkmark, go to that page and run the error check. The “check for errors” feature will tell you exactly what changes need to be made to clear the error.
2. Before submitting, it is **very important** that you open EACH PAGE of the application and click on “save” again. This resets the error checks, allows you to ensure that you are not submitting the application with any inter-page errors, and allows you to clear the errors before submission.
3. Only the authorized official may submit your agency’s application. Make sure to plan accordingly.
4. The NFMC team **highly suggests** that applicants plan to submit their application on or before February 8, 2010. The system will lock applicants out of their application exactly at 8:00 P.M. EST on February 9, 2010. It is not advisable for applicants to wait until this deadline to submit in case it takes longer than expected to submit – even one minute too late will not be accepted – or in case there are last minute errors that need time to be cleared before submission. There is a limited number of support staff available to assist applicants with their grant submission, and calls will only be answered on a first come, first served basis. The earlier you attempt to submit the application, the more likely it will be that a staff person will be available to assist you should errors occur.