

Tribal HUD-VASH Expansion NOFA: Frequently Asked Questions

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For any questions, please contact: TribalHUDVASH@hud.gov

Section II.A. Available Funds

Q1: Are existing Tribal HUD-VASH program participants eligible to apply for these competitive funds?

A1: Yes, existing Tribal HUD-VASH program participants are eligible to apply. According to the “Available Funds” section of the NOFA

(https://www.hud.gov/sites/dfiles/PIH/documents/Tech%20Correction%20Tribal%20HUD-VASH_FR-6400-N-73.pdf), “HUD intends to award up to \$1 million to Indian Tribes and TDHEs currently participating in the Tribal HUD-VASH program that have continued to demonstrate administrative capacity and need based on the funding criteria described in this NOFA” (p. 9). For more information regarding eligibility, see also the “Eligible Applicants” section on p. 10-11 of the NOFA.

Section II.C. Minimum/Maximum Award Information

Q1: Is there a minimum number of units a current Tribal HUD-VASH recipient must request when submitting a grant application?

A1: There is no minimum number of units a current Tribal HUD-VASH recipient must request. Applicants that have not previously received a Tribal HUD-VASH grant are required to request at least 15 units.

Section III.A. Eligible Applicants

Q1: Who is eligible to apply?

A1: Eligible applicants are Indian Tribes as defined in section 4(13) of NAHASDA and Tribally Designated Housing Entity (TDHE) authorized by one or more Tribes pursuant to section 4(22) of NAHASDA who have ever been allocated formula funding. An Indian tribe that authorizes a TDHE to apply on its behalf may not also submit its own application for funding.

Section III.D. Threshold Eligibility Requirements

Q1: Do applicants need to contact the Department of Veterans Affairs before applying to the program?

A1: Yes. The applicant must include an official letter of support from its local VA Medical Center or VA Healthcare System’s Director with its application. The letter must affirm that the tribe or TDHE has consulted with its local VA facility about its interest in establishing or expanding its own Tribal HUD-VASH program and that the VA commits to providing case management services for eligible Veterans, should the applicant succeed in receiving a Tribal

HUD-VASH award. A sample letter is posted on the ONAP Codetalk website, and as part of the application package on grants.gov.

Q2: Is a minimum application score required?

A2: Applicants must receive minimum scores of 20 points for Rating Factor 1, Capacity of the Applicant and 35 points for Rating Factor 3, Capacity to Administer the Program. Applicants must also score a minimum of 75 points overall in order to be eligible to receive a grant.

Q3: Can Formula Current Assisted Stock (FCAS) units be used for the program?

A3: FCAS units can be used to house Tribal HUD-VASH Veterans. However, if FCAS units are used for this purpose, then these units will not be counted in the IHBG recipient's FCAS formula count during the period that Veterans are housed in these units.

Section IV.B. Content and Form of Application Submission

Q1: Does the applicant's application submission package need a Tribal Resolution or a Tribal Certification to successfully meet the requirements of a complete application package?

A1: If an application is submitted by a TDHE on behalf of a Tribe where the Tribe has not previously participated in the Tribal HUD-VASH program, either a tribal resolution or tribal certification must be submitted authorizing the TDHE to submit the application under this program.

Current Tribal HUD-VASH participants must provide a statement whether the original tribal resolution for participation in the Tribal HUD-VASH program is in effect and applicable. If the original tribal resolution is no longer in effect and applicable, then the grantee must submit a new resolution or tribal certification. See Section IV.B.2.g. of the NOFA.

Q2: If I am using a federally negotiated indirect cost rate, do I need to state the amount in the Cost Summary section of a HUD-53246 on line 5B? If so, where can I find a HUD-53246?

A2: HUD Form 53246 is not a required submission for the Tribal HUD-VASH Expansion NOFA. If the applicant is using a federally negotiated indirect cost rate, then the application must clearly state the approved rate and distribution base in the **Detailed Budget**. The applicant must also include a letter stating the approved rate and distribution base or other documentation from the cognizant agency showing the approved rate.

Section V.A. Subfactor 1.5 – Expenditures

Q1: Subfactor 1.5 states "In assessing an applicant's undisbursed funds, HUD will neither consider the IHBG formula funds awarded in FY 2020 nor the IHBG funds awarded under the Coronavirus, Relief, and Economic Security (CARES) Act since Indian tribes and TDHEs would have recently been awarded this funding." The NOFA goes on to

state under category #2 “applicants not approved to invest formula IHBG funds will be evaluated on the expenditure of IHBG formula funding received in the last three federal fiscal years (2018-2020) in comparison with the amount of undisbursed IHBG funds remaining in LOCCS on the date this NOFA is published.”

Will IHBG formula funds awarded in FY 2020 be considered in the calculation for category #2 applicants?

A1: Yes, FY 2020 IHBG formula funds will be considered. Subfactor 1.5 should state “In assessing an applicant's undisbursed funds, HUD will neither consider the IHBG formula funds **awarded in FY 2021** nor the IHBG funds awarded under the Coronavirus, Relief, and Economic Security (CARES) Act since Indian tribes and TDHEs would have recently been awarded this funding.”

Section V.A. Subfactor 3.2 Availability of Housing Stock

Q1: For Subfactor 3.2, Category 2 for tenant-based rental assistance, do all of the proposed units have to be new to get full points?

A1: No. For Subfactor 3.2, Category 2 for tenant-based rental assistance, if the **majority** (50% or more) of units that an applicant proposes to use were **newly constructed, acquired, or rehabbed 12 months or less prior** to the application deadline of this NOFA, the applicant may receive the maximum number of points.

Q2: Our Tribe is facing high rent pricing due to low housing stock and high demand. Can an applicant apply if all or some proposed units need to be above FMR?

A1: Yes. Under Section VI, H. Rent, of the Consolidation Notice (83 Fed. Reg. 23710, May 22, 2018), a tribe/TDHE can charge up to 110 percent of FMR (or to place a veteran in a privately-owned unit with a rent up to 110 percent of FMR), without HUD’s prior approval. To charge above 110 percent, a tribe/TDHE must obtain HUD’s prior approval. For example, a tribe/TDHE may find it necessary to request such approval in order to address a request for a reasonable accommodation for a person with disabilities or in instances where rental market conditions render it difficult to find rent at 110 percent of FMR.