



**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Special Attention of:
Administrators, Offices of Native American
Programs; and Tribes, Tribally Designated
Housing Entities

Notice PIH-2020-06

Issued: April 22, 2020

Expires: This Notice
remains in effect until amended,
superseded, or rescinded.

Cross Reference(s):
NAHASDA
24 CFR Part 1000
2 CFR Part 200

SUBJECT: IHBG-CARES Implementation Notice

1. Purpose: The purpose of this Implementation Notice is to provide Indian tribes and Tribally Designated Housing Entities (TDHEs) with instructions on how to apply for Indian Housing Block Grant formula funding provided under the Coronavirus Aid, Relief, and Economic Security Act (Public Law 116-136) (CARES Act), and other program requirements. These grants will be called “IHBG-CARES” grants. This Notice will be referred to as the “IHBG-CARES Implementation Notice”.

2. Background: Pursuant to the authority provided under the CARES Act, an additional \$200,000,000 in IHBG formula funding is being provided to eligible Indian tribes and TDHEs specifically to prevent, prepare for, and respond to the Coronavirus disease 2019 (COVID-19), including to maintain normal operations and to fund eligible affordable housing activities under the Native American Housing Assistance and Self-Determination Act (NAHASDA) during the period that an IHBG recipient’s program is impacted by COVID-19. In addition, the CARES Act authorized HUD to waive, or specify alternative requirements for any statute or regulation (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment) that HUD administers to expedite or facilitate the use of IHBG-CARES grant funds to prevent, prepare for, and respond to COVID-19. This waiver authority also applies to IHBG funds appropriated under the Further Consolidated Appropriations Act, 2020 (Public Law 116-94).

On April 10, 2020, HUD issued PIH Notice 2020-5. The Notice describes in detail the various waivers and alternative requirements that have been issued with respect to IHBG-CARES grants and FY 2020 IHBG formula funds. Before applying for an IHBG-CARES grant, **all IHBG recipients are strongly advised to review PIH Notice 2020-5**, particularly section 13 of the Notice. Given the broad statutory authorities provided in the CARES Act, HUD may consider further waivers and alternative requirements for the IHBG program based on the needs of Indian Tribes and TDHEs to continue operations and meet the safety and

housing needs of those living in impacted areas. Indian tribes and TDHEs may submit waiver requests to HUD at any time for HUD's consideration.

Recipients are also encouraged to frequently visit the Centers for Disease Control and Prevention (CDC) website at www.cdc.gov/coronavirus/2019-ncov to ensure that they are relying upon the most up-to-date information.

3. Applying for IHBG-CARES Grant Funding: IHBG-CARES grants will be awarded as separate IHBG grants. On April 3, 2020, HUD published IHBG-CARES grant allocations for all Indian tribes and TDHEs that are eligible to receive funding. These allocations are available at: https://www.hud.gov/sites/dfiles/PIH/documents/IHBG-CARES_Formula_Allocations_4.3.20%20.pdf.

HUD recognizes that the current COVID-19 National Emergency has caused substantial disruption to the program operations of IHBG recipients across Indian Country. To help minimize unnecessary administrative burden and to enable recipients to expend these funds as expeditiously as possible given the ongoing COVID-19 National Emergency, HUD has worked to streamline the application process as much as possible, while also ensuring that all IHBG CARES grant funds will be used to prevent, prepare for, and respond to COVID-19, as required under the CARES Act.

In order for an Indian tribe or TDHE to receive its IHBG-CARES grant, the Indian tribe or TDHE must first submit an Abbreviated Indian Housing Plan/Annual Performance Report (IHP/APR) (Form: HUD-52737) to its ONAP Area Office. The Indian tribe or TDHE should only complete the Abbreviated IHP portion of this form to receive an IHBG-CARES grant, and will be required to complete the Abbreviated APR portion of the form at a later date.

The Abbreviated IHP/APR is a streamlined fillable PDF version of the regular IHP/APR. Under the Abbreviated IHP, HUD is requesting less information than is normally included in a regular IHP/APR and including certain data fields to capture CARES Act requirements. The regular IHP/APR form contains a total of 15 sections that IHBG recipients are normally required to complete. Under the Abbreviated IHP, IHBG-CARES recipients are only required to complete 7 sections, as described in more detail below. Abbreviated IHPs must specify how the IHBG recipient will carry out activities or projects that meet the requirements of the CARES Act.

Along with this Notice, HUD is making the Abbreviated IHP form available to all IHBG recipients. The Abbreviated IHP form must be completed and submitted to the ONAP Area Office electronically. The abbreviated form is created by selecting a checkbox on the first page of the form (in Section 1 – Cover Page) labeled “IHBG-CARES”. By selecting this box, the form automatically removes sections that do not have to be submitted to receive an IHBG-CARES grant, and modifies the drop-down help files for the required fields to assist the IHBG-CARES recipient in completing the form. Specifically, the Abbreviated IHP requires the IHBG-CARES recipient to complete Sections 1 (Cover Page), 3 (Programs), 5 (Budget), 7 (IHP Certification of Compliance), 8 (IHP Tribal Certification), 9 (Tribal Wage Rate Certification), and 12 (Audits).

Recipients will not be required to use the Energy and Performance Information Center (EPIC) to submit the Abbreviated IHP. The Abbreviated IHP must be submitted electronically via email to the ONAP Area Office.

Specific instructions on how to use and complete the form are included in the form. ONAP Area Office staff are also available to provide technical assistance to all IHBG recipients.

Indian tribes or TDHEs that did not submit a FY 2020 IHP (or whose IHP was not approved) may still take advantage of this funding opportunity by preparing and submitting an Abbreviated IHP/APR, but may be required to submit additional information to HUD, depending on how much information the Indian tribe or TDHE has submitted to HUD in the past that HUD determines it can reasonably rely on for purposes of these grants. These Indian tribes or TDHEs should consult with their ONAP Area Office for more guidance.

IHBG recipients are reminded of the following regulatory relief pertaining to the Abbreviated IHP found in PIH Notice 2020-5:

- **IHPs that Cannot be Formally Adopted at this Time:** HUD will accept any Abbreviated IHP that cannot be formally adopted by an Indian tribe or TDHE in accordance with their normal policies and procedures for adopting IHPs, provided an official or principal of the Indian tribe or TDHE who is authorized to act on behalf of the Indian tribe or TDHE provides a statement to HUD indicating that it is not practical or safe for the Indian tribe or TDHE to assemble a board or other governing body to conduct business to secure required approvals, at the time, due to the impact of COVID-19 on operations of the Indian tribe or TDHE (or the beneficiary Indian tribe of the TDHE). The Indian tribe or TDHE should take the necessary action, at a later date, when it is feasible and safe to do so, to either ratify the Abbreviated IHP previously submitted by the official or principal, if required under its policies and procedures, or submit an amendment to the Abbreviated IHP.
- **IHP Certifications:** IHBG recipients are required to provide HUD with all required IHP certifications in their Abbreviated IHPs. However, if an authorized official of an Indian tribe or TDHE provides a statement to HUD indicating that it is not practical or safe for the Indian tribe or TDHE to secure new certifications due to the impact of COVID-19 on its operations, or the operations of a beneficiary Indian tribe, HUD will accept all IHP certifications that were previously submitted and accepted by HUD for FY 2020 IHBG grants (or for FY 2019 IHBG grants for those IHBG recipients that have not yet submitted their FY 2020 IHP), in lieu of requiring new tribal certifications to be submitted. IHBG recipients that choose to use this alternative requirement will be deemed to have submitted such past certifications for the IHBG-CARES grant and will be bound by such certifications, accordingly.

TDHEs may submit Abbreviated IHPs on behalf of their beneficiary Indian tribes without having to provide any required new IHP Tribal certifications when applying for an IHBG-CARES grant. However, these TDHEs are required to consult with their beneficiary Indian tribes that they serve, in a manner that is feasible and when it is safe and practical to do so, and submit any appropriate amendments or certifications to their Abbreviated IHPs if they are directed to do so by the beneficiary Indian tribe.

4. IHP Submission and Review: HUD will review all Abbreviated IHPs and will make a determination as to whether an Abbreviated IHP is in compliance with the CARES Act and NAHASDA, as quickly as possible. HUD will make an initial determination of compliance

within 15 days after receipt of a complete Abbreviated IHP to expedite awarding of IHBG-CARES grants. HUD will make every effort to make its initial determination of compliance in even less time, when feasible. If HUD is unable to make an initial determination within 15 days, the Abbreviated IHP will not automatically be deemed to be approved by operation of law. If an IHBG-CARES recipient fails to adequately describe how the proposed activities are tied to preventing, preparing for, or responding to COVID-19, or meet other Abbreviated IHP requirements, HUD will reject the Abbreviated IHP and notify the IHBG-CARES recipient of any deficiencies in the Abbreviated IHP. If the IHP is rejected, IHBG-CARES recipients should amend and resubmit the Abbreviated IHP for further consideration. The ONAP Area Office will provide any necessary technical assistance to help the IHBG-CARES recipient modify its Abbreviated IHP, as appropriate, to ensure that it can be found in compliance with the CARES Act, NAHASDA, and any requirements specified by HUD in waivers and alternative requirements, and guidance.

IHBG-CARES recipients are reminded that, after an Abbreviated IHP is found in compliance, they may choose to amend their Abbreviated IHP to adjust any planned eligible activities or programs, provided such activities or programs are eligible during the COVID-19 National Emergency. HUD expects this to be necessary for some IHBG-CARES recipients as COVID-19 progresses over time, and different Tribal communities are impacted in various ways.

5. Follow-up Actions: As soon as the Abbreviated IHP is found in compliance, ONAP will email the IHBG-CARES grantee an award letter and a grant agreement package to sign and return via email. Funds will be available to draw down from the Line of Credit Control System (LOCCS) as soon as the fully executed grant agreements are returned by the recipient and processed by HUD. All documents will be provided in electronic file format and must be returned in electronic file format. Documents such as the grant agreement can be signed, scanned, and sent back to ONAP electronically. The IHBG-CARES recipient should maintain all documents with wet signatures in their records.

6. Eligible Purposes: The CARES Act requires that recipients' use of IHBG-CARES grants be tied to preventing, preparing for, and responding to COVID-19, including maintaining normal operations and funding eligible affordable housing activities under NAHASDA during the period the program is impacted by COVID-19.

To comply with this requirement, IHBG-CARES recipients must ensure that all activities being proposed can be tied to at least one of the following three eligible purposes:

- 1. Activities, Projects, or Programs to Prevent COVID-19**
- 2. Activities, Projects, or Programs to Prepare for COVID-19**
- 3. Activities, Projects, or Programs to Respond to COVID-19**

Pursuant to the CARES Act, these funds may also be used to maintain normal operations and fund eligible IHBG activities during the period that a recipient's IHBG program is impacted by COVID-19. HUD expects and encourages recipients to expend funds expeditiously given the ongoing COVID-19 National Emergency. However, COVID-19 may have impacts on a recipient's IHBG program that range from immediate or short-term, to medium-and long-term in nature. Accordingly, for purposes of this requirement, HUD will allow recipients to use IHBG-CARES grant funds to maintain normal operations both now and after the COVID-19 National Emergency, provided that the IHBG-CARES recipient can demonstrate

that COVID-19 continues to impact its program.

HUD will also consider activities, projects, or programs that are designed to prevent, prepare for, and respond to COVID-19 in the short-term to long-term as activities that meet the purposes of the CARES Act. This includes activities, projects, or programs that will reduce or mitigate the short-term, medium-term, and also longer-term risks and vulnerabilities of Tribal communities to COVID-19 (e.g., activities that reduce overcrowding).

While not required, IHBG-CARES recipients are encouraged to consider the short-term and medium-term needs of their communities first before undertaking more long-term activities and projects designed to prevent, prepare for, or respond to COVID-19. HUD also encourages IHBG-CARES grantees to prioritize expending these funds as expeditiously as possible, given the ongoing COVID 19 National Emergency.

IHBG-CARES grant funds may also be used to cover or reimburse allowable costs incurred by the IHBG-CARES recipient, provided the funds were used to prevent, prepare for, or respond to COVID-19. This includes covering or reimbursing allowable costs incurred back to the date the Indian tribe or TDHE began preparing for COVID-19, which may be prior to the date of enactment of the CARES Act. Please see paragraph 8 of this Notice, Reimbursement of Costs.

To assist recipients in ensuring that the activities being proposed can be tied to one or more of the three eligible purposes of the CARES Act, Indian tribes and TDHEs should consider the following:

- **Prepare for:** IHBG-CARES grant funds may be used prior to a local, service area, or regional coronavirus outbreak. This includes, but is not limited to, activities designed to develop processes and procedures to help keep people healthy, and other activities designed to reduce the risk of exposure to COVID-19, and avoid or slow the spread of the disease. Examples may include housing activities designed to reduce severe overcrowding, providing food delivery services to eligible families (including the elderly, disabled, and other high risk populations) to allow them to shelter in place, and public health campaigns designed to educate families on how to prepare for a possible outbreak in the community and ways to minimize community spread.
- **Prevent:** IHBG-CARES grant funds may be used during a COVID-19 local, service area, or regional coronavirus outbreak. This includes, but is not limited to, activities designed to prevent the initial or further spread of the virus to staff, Tribal housing residents, and the Tribal community. Examples may include distributing Personal Protective Equipment to housing maintenance staff, residents, and members of the community, using IHBG-CARES funds to clean common areas to prevent infections, and much more.
- **Respond to:** Once COVID-19 has spread to staff, Tribal housing residents, and/or the Tribal community, examples of how Indian tribes and TDHEs may choose to respond to COVID-19 may include using IHBG-CARES grant funds to care for those who have become infected and to limit the exposure and spread of the virus, provide rent assistance to eligible families that cannot pay rent, carrying out activities to reduce severe overcrowding, prevent homelessness to ensure families are stably housed, and much more. Funds may continue to be used after the local, service area,

or regional coronavirus outbreak on any continuing expenses incurred due to the spread of COVID-19.

In most cases, maintaining normal operations and carrying out eligible activities, projects, or programs during the period that a recipient's program is impacted by COVID-19 will likely tie back to the "Respond to" COVID-19 purpose. However, HUD recognizes that there may be circumstances where maintaining normal operations and carrying out eligible activities may tie back to the "Prepare for" or the "Prevent" eligible purpose. One example of maintaining normal operations is using IHBG-CARES funds to carry out eligible IHBG activities that the recipient initially planned to carry out with its regular IHBG funds, but did not because it had to use its regular IHBG funds to carry out an unplanned activity to prevent, prepare for, or respond to COVID-19. In this scenario, the IHBG-CARES grant funds can be used to carry out the original IHBG activity that the recipient planned on carrying out, but did not carry out, due to COVID-19.

While these descriptions of the eligible purposes can guide Indian tribes and TDHEs, certain activities, depending on context, do not always obviously fit under one or more categories, and the recipient should therefore use its best judgment to determine to which category or combination of categories that its activity is tied, based on local circumstances. These descriptions are designed to provide general guidance to recipients and are not intended to limit the range of eligible IHBG-CARES grant activities that can be carried out. Provided a recipient can, in HUD's judgment, reasonably tie their IHBG-CARES activities back to one or more eligible purposes, HUD will accept the recipient's classification.

7. Eligible Activities: Examples of activities, projects, or programs that could be funded, provided they meet one or more of the above eligible CARES Act purposes, include, but are not limited to, the following:

Eligible Housing Activities

- Carrying out activities eligible under IHBG provided those activities will prevent, prepare for, and respond to COVID-19;
- Payment of tenant and homebuyer utilities;
- Installing a lockbox or other method for collecting rent payments without the need for personal contact;
- Supporting laundry facilities to assist residents with eliminating the spread of COVID-19;
- Paying for IHBG operating costs due to a significant reduction in rent receipts caused by COVID-19;
- Providing essential housing services to shelter residents including childcare, education services, employment assistance, outpatient health services, legal services, mental health services, and transportation, provided such services are not duplicative of other Federally-funded services;
- Working with resident groups to help educate residents on social distancing and other practices designed to minimize the risk of community spread of COVID-19;
- Acquiring, constructing, converting, or rehabilitating structures to reduce and prevent homelessness, and reduce vulnerability to COVID-19;

Emergency Response

- Carrying out activities that would prevent individuals from becoming homeless and

rapidly rehousing homeless individuals;

- Acquiring, constructing, converting, or rehabilitating structures that can serve as temporary emergency shelters, or converting existing facilities for this purpose, to ensure homeless persons are provided safe shelter and to minimize the risk of community spread of COVID-19;
- Providing short-term rental assistance to homeless persons in hotel/motels to minimize infection and spread of COVID-19;
- Providing units or other space for temporary quarantine purposes as a result of COVID-19;
- Providing emergency housing for health care workers;
- Purchasing Telehealth equipment to allow assisted residents access to health care providers from home;
- Purchasing and distributing personal protective equipment (PPE) such as gloves, surgical masks and goggles, hand hygiene products, soap, paper towels, hand sanitizer, hand wipes, tissues, and thermometers;
- Purchasing and distributing cleaning products such as disinfectants, sanitizers, waste disposal supplies, and other supplies to disinfect homes of residents, common areas, housing-related public facilities, and other public spaces like playgrounds;
- Purchasing of sanitation equipment;
- Purchasing and distribution of water, groceries, prescriptions, and other items for quarantined families, Elders, Veterans, at-risk populations, or disabled households;
- Purchasing beds or cots for isolation/quarantine centers.

Administrative Activities

- Preparing housing or TDHE staff and Board of Commissioners to conduct business in a remote working environment, and providing them with necessary supplies to carry out the IHBG program;
- Setting up web-based communication options for program participants and staff;
- Implementing policies, procedures, and other measures to protect vulnerable populations;
- Revising the approval process for policies and procedures in order to limit person-to-person contact;
- Paying staff salaries including the salaries of employees who must shelter in place or are otherwise prohibited from interacting with community members due to COVID-19;
- Paying hazard pay for essential workers that are managing or maintaining units, or staffing emergency or isolation centers, provided such costs are considered necessary and reasonable under 2 CFR Part 200;
- Paying transportation costs of staff to perform IHBG program functions or assist tenants in accessing food, medical care, or prescriptions.

8. Reimbursement of Costs: IHBG-CARES grants may also be used to cover or reimburse any costs incurred by an IHBG recipient that are otherwise eligible and allowable under the IHBG-CARES grant and that were paid by the IHBG recipient, dating back to the date that the IHBG recipient began preparing for COVID-19. Recipients must indicate in **Section I** of the Abbreviated IHP what date they began preparing for COVID-19. HUD will not accept dates that pre-date January 21, 2020 – the date of the first confirmed case of COVID-19 in the United States according to the CDC. Recipients must also add a program in the Abbreviated IHP specific to reimbursement costs. The **Unique Identifier (Block 1 of**

Section III) must be titled COVID-19 reimbursement costs. Recipients must maintain documentation demonstrating when the recipient began preparing for COVID-19, such as notes on formal planning meetings or calls, and must maintain documentation to support any costs incurred by the recipient that the recipient plans to cover or reimburse with IHBG-CARES grant funding. Please note that FY2020 IHBG formula funds that are reprogrammed to prevent, prepare for, and respond to COVID-19 cannot be reimbursed by IHBG-CARES grants.

9. Reporting Requirements: The following reporting requirements apply to the IHBG-CARES grants:

A. Quarterly Federal Financial Reports (SF-425): that account for the receipt and disbursement of IHBG-CARES funding.

B. Abbreviated APR: IHBG-CARES recipients will be required to submit information regarding their expenditure of their IHBG-CARES grant in an Abbreviated APR (Form: HUD-52735). A separate Abbreviated APR must be submitted covering the IHBG-CARES grant funding. This Abbreviated APR will be in addition to the recipient's annual APR which will cover the recipient's regular IHBG formula grant funding.

The Abbreviated APR for the IHBG-CARES grant will cover the recipient's typical reporting period and will be due to the ONAP Area Office within 90 days of the end of their program year unless otherwise specified. The type of information HUD will require to be reported, which is subject to change, will include:

- (1) The total amount of IHBG-CARES grant funding received from HUD.
- (2) The amount of IHBG-CARES grant funding that was expended or obligated during the tribal program year to:
 - (a) prevent COVID-19;
 - (b) prepare for COVID-19; or
 - (c) respond to COVID-19.
- (3) A list of all activities or projects for which IHBG-CARES grant funds were expended or obligated under each of the above eligible purpose categories, including:
 - (a) the name or type of the activity or project;
 - (b) a description of the activity, including whether the activity is:
 - (i) eligible under the IHBG program; or
 - (ii) an eligible activity pursuant to a waivers and alternative requirement set forth in PIH Notice 2020-5 related to prevention, preparation for, and response to COVID-19.
 - (c) an explanation of how the activity addresses one or more of the eligible purposes identified in (2) above;
 - (d) an evaluation of the completion status of the activity;
 - (e) an estimate of the number of eligible families that were assisted by this activity, including the number of low-income Indian families, non-low-income Indian families, and non-Indian families; and
 - (f) the name of the person to contact at the Tribe or TDHE if HUD staff have questions about the activity or need additional information.

HUD will issue further guidance in the future on Abbreviated APR requirements. These reporting requirements are subject to change through future notice. As the IHBG-CARES recipient develops its Abbreviated IHP, it should ensure that throughout its

implementation of this grant, it will collect this information and plan on reporting on it in its Abbreviated APR.

C. Additional CARES Act Reporting: Section 15011 of the CARES Act requires that recipients of \$150,000 or more of CARES Act funding submit, not later than 10 days after the end of each calendar quarter, a report containing information regarding the amount of funds received; the amount of funds obligated or expended for each project or activity; a detailed list of all such projects or activities, including a description of the project or activity; and detailed information on any subcontracts or subgrants awarded by the recipient. As outlined in the Office of Management and Budget (OMB) memorandum, M-20-21, existing reporting requirements are anticipated to meet the requirements of Section 15011, but the content and format for this reporting is still under development and will need to be reviewed against current program practices. The Department will work in coordination with OMB to ensure that this requirement can be fulfilled by recipients of CARES Act funding in a manner that utilizes to the greatest extent possible existing reporting streams, providing the necessary transparency and accountability with minimal additional burden. If additional reporting is necessary, further guidance will be released by the Department in the near future.

10. Use of Existing IHBG Formula Funding: HUD strongly encourages IHBG recipients to consider revising FY 2020 IHP/APRs in order to reprogram **FY 2020 IHBG** formula funding to help address COVID-19, because this funding is more likely to be immediately available. HUD encourages IHBG recipients to review the waiver relief provided in PIH Notice 2020-5 that is designed to help facilitate and expedite IHBG recipients' ability to reprogram FY 2020 IHBG funds to be used for eligible activities to help prevent, prepare for, and respond to COVID-19, including maintaining normal operations during the period that the IHBG program is impacted by COVID-19. FY2020 IHBG formula funds that are reprogrammed to respond to prevent, prepare for, and respond to COVID-19 cannot be reimbursed by IHBG-CARES grants.

11. Instructions for Amending a FY 2020 IHP/APR: In order to ensure adequate tracking of FY 2020 IHBG funding utilized to prevent, prepare for, and respond to COVID-19, IHBG recipients should amend their IHP/APR in EPIC (or in the case of certain IHBG recipients in Alaska, the PDF document) by adding one or more programs specific to these activities and must include prescribed information for the following identified fields.

Unique Identifier (Block 1a (EPIC) or Block 1 (PDF) of Section III): The Unique Identifier must be COVID-19 Prevention; COVID-19 Preparation; or COVID-19 Response, depending on the nature of the activities.

Families to Be Served (Block 6 of Section III): Indicate whether the families to be served are low-income Native American Families; non low-income Native American Families; or Non-Native Families. A separate program must be established for each type of family being served.

12. General Resources:

Office of Native American Programs COVID-19 Recovery Programs website:
https://www.hud.gov/program_offices/public_indian_housing/ih/Covid_Recovery

IHBG-CARES Waivers and Alternative Requirements, PIH Notice 2020-5:

<https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-05.pdf>

Office of Native American Programs website, including updated COVID-19 related Frequently Asked Questions: <https://www.hud.gov/codetalk>

HUD COVID Resources and Fact Sheets: <https://www.hud.gov/coronavirus>

13. Paperwork Reduction Act: The information collection requirements contained in this Notice are approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C. 3520). In accordance with the PRA, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. The active information collections contained in this Notice are approved under the PRA OMB Control Number 2577-0218.

14. Further Information: Any questions concerning this Notice should be directed to your ONAP Area Office.

R. Hunter Kurtz, Assistant Secretary
for Public and Indian Housing