IHBG Competitive NOFA: Frequently Asked Questions
Updated: 7/8/2019 – the latest updates are in red
Questions? Contact IHBGCompetitiveProgram@hud.gov.

Eligibility

Q1: What will HUD consider to be a delinquent audit submission? How will time zones factor into the review of the audit submission date? How will weekends and holidays factor into the review of the audit submission date?

Applicants subject to the audit reporting requirements of 2 CFR 200, Subpart F, must not have any delinquent audit report submissions during the one-year period immediately preceding the date that the NOFA was published (see NOFA, Section III.D.5), specifically May 7, 2018-May 7, 2019. HUD will review the information available through the Federal Audit Clearinghouse (FAC) to determine if an audit has been submitted (i.e., uploaded into the FAC) late. In cases where the audit submission was due on a weekend or holiday and was submitted the following business day, the audit submission will be considered timely. If the information available in the FAC is unclear as to whether the audit submission occurred after it was due, HUD will reach out to the applicant for additional information. HUD will consider an audit report submission that was on time in the time zone in which it was submitted to be timely.

Q2: How will an applicant know if it has open audit findings?

The NOFA requires that applicants must not have any delinquent audit report submissions or delinquent open HUD-ONAP audit findings pertaining to financial management, accounting, and internal controls during the one-year period immediately preceding the date that the NOFA was published (May 7, 2018-May 7, 2019), or the application will not be evaluated (see NOFA, Section III.D.5). The NOFA specifies that delinquent open audit findings are those in which the target date or revised target date for corrective action has been exceeded. To address this NOFA requirement, HUD will review records to determine if the applicant has delinquent open audit findings. The NOFA specifies that the applicant’s findings have to be open and delinquent (late) for HUD to not evaluate the application.

The ONAP Area Offices issue Management Decision Letters to tribes/TDHEs to notify them of audit findings, propose corrective actions, and establish target dates. If an applicant is not sure if it has open audit findings and wants to find out, they should reach out to their assigned ONAP Grants Evaluation Specialist.

Q3: Is it possible to apply for this grant as an individual?

No, individuals may not apply for this grant. Only Tribes and TDHEs are eligible to apply for IHBG competitive funds.
Application and Submission Questions

Q1: If multiple projects are being proposed in an application does each project require a separate narrative?

No. Each eligible applicant may only submit one application under this NOFA. The application may propose one project or multiple projects. If the applicant proposes multiple projects, HUD will evaluate all projects covered in the application together and will not separately score each project proposed (see NOFA, III.D.3). The NOFA limits the application’s Workplan Narrative to 25 pages (see NOFA, Section IV.B.2.e). The Workplan Narrative may include supporting attachments (see NOFA, Section IV.B.2.f).

Q2: Is some sort of acknowledgement of threshold items required in the narrative?

No.

Q3: Is the applicant required to post the application for a public comment period?

No.

Q4: Who should sign the SF-424?

For an application under this NOFA to be complete, the applicant must sign the SF-424. The SF-424 must be signed by an authorized representative.

Q5: Can an applicant be awarded both two points for projects that will be located in Opportunity Zones, and two points for Promise Zones, for a total of four preference points?

Yes. To qualify for the preference points for Opportunity Zones, the applicant must submit a certification signed by an authorized official affirming to HUD that their project is located in an Opportunity Zone, and the applicant must submit supporting documentation showing that the project will be located in an Opportunity Zone. The list of designated OZs is available on the US Department of Treasury website. See NOFA, Section IV.B.2.n.

To qualify for the preference points for Promise Zones, the applicant must submit HUD Form 50153, “Certificate of consistency with Promise Zone Goals and Implementation”, signed by the Promise Zone Official authorized to certify the project meets the criteria to receive preference points. See NOFA, Section IV.B.2.o.

Q6: Who is the applicant’s point of contact for resolution to any technical deficiencies?

The NOFA specifies that HUD will notify the authorized representative by email when HUD identifies a curable deficiency (see NOFA, Section IV.D.4). HUD will also notify the point of contact that the applicant has named in their application (Form SF 424, item 8.f).
Q7: Is the cap on administrative and planning costs determined by considering the grant award amount, or the total project cost (including leverage)?

The cap on administrative and planning expenses is based on amount of the grant award, not the total project cost. Applicants that are awarded a grant under this NOFA in excess of $500,000 may use up to 20 percent of the grant award for IHBG-eligible administrative and planning expenses. Recipients awarded a grant in the amount of $500,000 or less may use up to 30 percent of the grant award for these costs.

Q8: Is the “Certification of Compliance” (NOFA Section IV.B.h.) submitted as a separate document?

Yes, applicants must submit the Certification of Compliance as a separate document, signed by their authorized official. HUD recommends that the applicant submit this certification on its own letterhead.

Q9: If an applicant is applying for multiple projects, does it have to submit an Implementation Schedule (HUD-53247), Cost Summary (HUD-53246), workplan narrative, and budget narrative for each project?

No, an applicant is not required to submit these application materials separately for each project. However, an applicant may choose to submit this information separately based on its preference.

Regardless of submission format, HUD will evaluate all projects covered in the application together and will not separately score each project proposed, as stated under Threshold Factor #3, “Number of Applications and Eligible Activity Project(s),”

Q10: Is the project implementation narrative described in Subfactor 3.3 a separate submission requirement or is this included as part of the Workplan Narrative?

The Workplan Narrative as described on pages 13-14 of the NOFA is the narrative to all five rating factors listed in Section V. The project implementation narrative is included as part of the Workplan Narrative. The project implementation narrative supports both the Project Implementation Plan and Implementation Schedule (HUD-53247) described in Subfactors 3.2-3.3.

Q11: Is the “Environmental Review – Expression of Intent” (NOFA Section IV.B.j) submitted as a separate document or is this described in the Workplan Narrative?

The “Environmental Review – Expression of Intent” is a separate document, which must be submitted in the application.
Eligible Activities

Q1: Can IHBG competitive funds be used towards the design and construction of both NAHASDA housing and affordable community housing?

Yes, IHBG competitive funds may be used towards any eligible affordable housing activities for the benefit of families that meet the criteria of 24 CFR §1000.104.

Rating Factor 2-Need

Q1: Is Subfactor 2.3, “Past Efforts to Address Identified Need” designed to award more points to an applicant that has recently pursued a project?

No. The purpose of Subfactor 2.3 is for the applicant to describe why it is an opportune time to actively pursue the proposed project. Also, HUD is looking for a discussion of any past efforts or potential barriers towards implementing the proposed project.

Points will be awarded based on the detail provided in answering the Subfactor criteria, not on the timeframe elapsed since an applicant has pursued the project or similar activity.

Rating Factor 3-Soundness of Approach

Q1: What is the scoring methodology for Subfactor 3.1, “IHBG Competitive Priorities?”

ONAP will award a maximum of 10 points under this Subfactor as follows:

1. HUD will calculate percentage of funding proposed towards the eligible activity.\(^1\)
   a. **For Applications with Multiple Activities**: HUD will take the percentage of funding from Step #1 and will determine which Subfactor category (3.1a-3.1d) to apply. HUD will use the category that would provide the applicant with the highest points.
   b. **For Applications with Acquisition Projects**: HUD will use the appropriate Subfactor category (3.1a-3.1d) depending on the nature of the project proposed. For instance, if an applicant is acquiring units to remodel, then HUD will apply the rehab category for this Subfactor.

2. **Rounding**: HUD will apply standard rounding rules. Therefore, 74.5% would be rounded to 75%, while 74.4% would be rounded to 74%.

For detailed examples, please review the Rating Factor 3 training module posted on Codetalk.

\(^1\) Note: HUD will not include any administration and planning costs in this calculation.
Training Questions

Q1: In order to submit an application, do I have to attend ONAP training?

Participating in NOFA training is optional and is not a requirement for submitting an application under this competition. The trainings provide an opportunity for interested applicants to learn more about the NOFA requirements.