FY 2021 Indian Housing Block Grant (IHBG) Competitive NOFO Training
In the Consolidated Appropriations Act of 2021, Congress provided a total of $100,000,000 for competitive grants to eligible IHBG recipients authorized under NAHASDA in addition to formula-based funding.

HUD awarded funds appropriated in FY2021 to an applicant under the FY20 IHBG Competitive NOFO due to a HUD error. Accordingly, HUD is making $95 million available under this NOFO.
The IHBG program is authorized under Title I of the NAHASDA Act.

Under the program, eligible Indian tribes and Tribally-Designated Housing Entities (TDHEs) receive grants to develop, maintain, and operate affordable housing in safe and healthy environments on Indian reservations and in other Indian areas and carry out other affordable housing activities.

Grant funds must be used to primarily benefit low-income Indian families.
PURPOSE

Under this NOFO, HUD will give priority to projects that spur construction that will increase the number of housing units, rehabilitation that will increase the useful life of existing affordable housing, acquisition of existing housing units that increase housing stock and necessary housing-related infrastructure projects, while considering need and administrative capacity.

Applicants may also apply for funding to carry out other eligible activities under NAHASDA. Model activities are not eligible under this NOFO.
PURPOSE

Applicants are encouraged to propose projects that are part of a comprehensive, long-term plan to address local housing conditions, including overcrowding and physically deteriorating units and; future infrastructure and economic development opportunities.
Changes from Previous NOFO

Available Funds:
• $95 million available for FY 2021.

Eligible Applicants:
• Eligible applicants may subaward to other entities.
Changes from Previous NOFO (cont.)

Threshold Eligibility Requirements

Threshold #3-Number of Applications and Eligible Activity Project(s): Added language specifying that if a TDHE serves as an umbrella organization for multiple tribes, the TDHE may only submit one application under this NOFO. Also, the applicant may not receive a grant that exceeds the applicable maximum grant amount set under this NOFO.

Format and Form

Included in the list of submissions, Firm Commitment Documentation discussed in Rating Factor 4.
Changes from Previous NOFO (cont.)

Rating Factor 1

Subfactor 1.1 - Managerial and Technical Staff: Added language to clarify that the applicant **does not** need to address recent, relevant, and successful as part of the gap in capacity analysis.

Subfactor 1.2 - Procurement and Contract Management: Added language to clarify that outdated references will not be accepted.

Subfactor 1.3 - IHBG Expenditures: Added language to clarify that the applicant does not have to address the LOCCS balance in its work plan narrative unless addressing the undisbursed balance. The maximum points allowed were reduced to two.

Subfactor 1.4 - Findings: Added language to clarify that the applicant does not have to address this subfactor in the work plan narrative. Also, added language to clarify that the findings of the corresponding Tribe/TDHE will be evaluated. The maximum points allowed were reduced to two.
Rating Factor 1

**Subfactor 1.5- Timely Reporting.** Added language to clarify that the applicant does not have to address this subfactor in the work plan narrative. The maximum points allowed were reduced to two.

**Subfactor 1.6- Late Audit Submission** - Removed from threshold requirements and added as a sub-factor. Maximum points allowed is two.

**Sub-factor 1.7- Program Performance Going Forward** was added to Rating Factor 1 that requires a detailed explanation of whether applicants are affected by COVID-19.
Changes from Previous NOFO (cont.)

Rating Factor 2

Subfactor 2.1.b - Identified Needs and Supporting Data - added minimum needs to point value

Subfactor 2.4- Sustainability: Added language to clarify that applicants that propose infrastructure projects which support the development of affordable housing after the Period of Performance, must describe their plans to establish an affordability period in compliance with Section 205 of NAHASDA.
Changes from Previous NOFO (cont.)

Rating Factor 3

Subfactor 3.1-IHBG Competitive Priorities: Added language to clarify that HUD will calculate percentage of funding proposed towards the eligible activity, excluding administration and planning costs. Added language to clarify the treatment of proposed infrastructure projects.

Subfactor 3.2 - Deleted reference to Section 3 requirements

Subfactor 3.4 – Budget – (Rating Factor Description) – deleted the following language – “HUD will also evaluate whether housing and non-dwelling structures that the applicant proposes to develop, acquire, or assist will meet moderate cost or design standards outlined in 24 CFR 1000.156-1000.162

Subfactor 3.4 – Budget (Points Structure) - Added language to clarify acceptable supporting documentation in review of Total Development Costs.
Changes from Previous NOFO (cont.)

Rating Factor 4-Leveraging Resources:

Added language to clarify that tax assessments are considered appraisals. Added language to point breakdowns to clarify that only leveraging resources with required firm commitment documentation will be counted.
I. Getting Started
AVAILABLE FUNDS

Estimated Total Funding
$95,000,000

Minimum Award Amount
$500,000

Maximum Award Amount
$5,000,000

Number of Awards
HUD expects to make approximately 20 awards from the funds available under this NOFO.

The number of awards will be based on the number of proposals HUD reviews, approves, and funds.
Available Funds (cont...)

This NOFO will fund applications for (FY) 2021.

This is a competitive grant. All applications received through this NOFO and pass application screening and threshold review will be rated.

Funds will be awarded in rank order based on the score received on the application.
The **Period of Performance** and planned draw-downs for any grant awarded under this NOFO must be included on the SF-424 (Blocks 17a-17b) and the Implementation Schedule, form HUD-53247 and approved by HUD. Costs must be incurred during the period of performance identified on the grant award.

**Estimated Project Start Date:** 04/1/2022  
**Estimated Project End Date:** 03/31/2027  
**Length of Project Periods**  
Projects awarded under this NOFO will be limited to 5 years

Applicants may request a shorter period of performance based on the project that is being proposed.
III. Eligibility Information
ELIGIBLE APPLICANTS

- Indian tribes (as defined under section 4(13) of NAHASDA
- Tribally Designated Housing Entity (TDHE) (as defined under 4(22) of NAHASDA) who have ever been allocated formula funding.
- An applicant does not have to be a current formula recipient to apply!
- Applications submitted by a TDHE on behalf of an Indian tribe(s) must include a tribal certification(s) or resolution(s) on official letterhead authorizing the TDHE to apply on behalf of the tribe(s).
HUD will accept an existing Indian Housing Plan (IHP) certifications that state that the tribe has delegated to the TDHE the authority to submit an IHP or application on behalf of the tribe without prior review by the tribe.

The certification(s) or resolution(s) must be submitted with the application. See Section IV.B.2.l.

An Indian tribe that authorizes a TDHE to apply on its behalf may not also submit its own application for funding. Such application will not be evaluated.
ELIGIBLE APPLICATIONS

Alaska Tribes

Pursuant to Section 211 of the General Provisions in the Appropriations Acts, only Native Alaskan tribes that received IHBG grants in Fiscal Year 2005 are eligible to apply directly for funding under the Notice of Funding Availability (NOFO).

Native Alaskan tribes that are required to designate a Tribally Designated Housing Entities (TDHE) in Alaska for its IHBG formula program may not apply directly for funding under this competition.

Native Alaskan tribes that choose to but are not required to designate a TDHE in Alaska for its IHBG formula program may apply for IHBG competitive funds directly.
COST SHARING AND MATCHING

Cost sharing or mandatory matching is not required under this grant, but applicants are encouraged to leverage other Federal (including IHBG formula funds) and non-Federal sources. (See Rating Factor 4 of this NOFO.)

HUD will award points to applicants that have an inability to effectively leverage funds due to distressed conditions of their communities.
Applicants who fail to meet any of the following threshold eligibility requirements will be deemed ineligible.

Applications from ineligible applicants will not be evaluated.
THRESHOLD REQUIREMENTS

1. Resolution of Civil Rights Matters
2. Timely Submission of Applications
3. Number of Applications and Eligible Activity Project(s)
4. Grant Ceiling
5. Late Audit Submission
6. Threshold Rating Factors
7. Workplan Narrative
THRESHOLD REQUIREMENTS

1. Resolution of Civil Rights Matters - If there are any outstanding civil rights matters, they must be resolved to HUD's satisfaction prior to grant award, provided that all applicable legal processes have been satisfied.

2. Timely Submission of Applications - Applications submitted after the deadline (11:59:59 EST - December 1, 2021), that do not meet the requirements of the grace period policy will be marked late. Late applications are ineligible and will not be considered for funding.
Threshold Requirements

Number of Applications and Eligible Activity Project(s)

Each eligible applicant may only submit one application under this NOFO which may include one project or multiple projects.

For example: An umbrella TDHE may submit 1 application, but it could cover several projects for the tribes it represents.

If an applicant submits more than one application, HUD will only accept the last application submitted by the application deadline.

Also, an Indian tribe that authorizes a TDHE to apply on its behalf may not also submit an application under this NOFO.
Threshold Requirements

• Regardless of whether the applicant proposes one or multiple projects for funding, the applicant may not receive a grant that exceeds the maximum $5,000,000 grant ceiling set under this NOFO.

• Additionally, if an applicant proposes multiple projects, HUD will evaluate all projects covered in the application together and will not separately score each project proposed.
Threshold Requirements

**Grant Ceiling:** If an applicant requests more than the maximum grant amount of $5,000,000 under this NOFO, then the application will not be reviewed.

Applicants must clearly document the requested Federal funding amount on line 18a of the application for Federal Assistance (SF-424).
Threshold Requirements

Rating Factors Thresholds

Applicants must receive:

- Minimum **combined** score of 35 points for Rating Factor 1-Capacity of the Applicant and Rating Factor 2-Need
- 20 points for Rating Factor 3-Soundness of Approach.
- Overall score of 75 points (without the addition of Preference Points)

Applicants who do not meet the minimum score for each of these rating factors and an overall score of 75 points (without the addition of Preference Points) will be ineligible to receive a grant under this competition.
Threshold Requirements

Workplan Narrative

The Workplan Narrative is the response to all five rating factors listed in Section V of this NOFO and encompass the proposed IHBG Competitive project(s). HUD will not review applications with Workplan Narratives that do not comply with the following requirements:

- Maximum 30 pages (excluding supporting attachments and required forms);
- Double-Spaced;
- Letter-sized paper, 8-1/2 x 11 inches;
- Times New Roman 12-point font; and
- At least 1-inch margins on all sides.
- Footnotes may follow standard footnote format – 10-point font and single spaced.
- Tables may be single spaced
Statutory and Regulatory Requirements Affecting Eligibility

- Eligibility Requirements for Applicants of HUD's Grant Programs
- Program Specific Requirements
- Criteria for Beneficiaries
IV. Application and Submission Information
Obtaining an Application Package

Download Application Instruction and Application Package

• Verify:
  • CFDA Number: 14.867
  • Opportunity Title: Indian Housing Block Grant – Competitive Grants
  • Funding Opportunity Number: FR-6500-N-48

The Application package contains the portable document forms (PDFs) available on grants.gov, such as the SF-424. The Instruction Download contains official copies of the NOFO and forms necessary for a complete application.
Obtaining an Application Package

- Download the most recent updated package in Grants.gov.
- Updated **Certification for Opportunity Zone Preference Points** form is included in application package or on Codetalk.
- Applicants that submit paper applications can print and submit the **Certification for Opportunity Zone Preference Points** form with application.
- Please view **Dear Tribal Leader** (DTL) letter (dated 9/10/2020) posted on Codetalk for more information.
Waiver requests for paper application

• An applicant demonstrating good cause may request a waiver from the requirement for electronic submission.
• Must be received by HUD at least 7 days prior to application deadline date

Send the requests via email to: IHBGCompetitiveProgram@hud.gov
Content and Form of Application Submission

- You must verify that boxes 11, 12, and 13 on the SF-424 match the NOFO for which you are applying. If they do not match, you have downloaded the wrong Application Instruction and Application Package.

- Submission of an application that is otherwise sufficient, under the wrong CFDA and Funding Opportunity Number is a non-curable deficiency.

- Additionally, your complete application must include the appropriate narratives and non-form attachments.

- Narratives and other attachments to your application must follow the format guidelines.
Unless otherwise noted as a curable deficiency if information under this section is not submitted with the application or is submitted incorrectly, then the application will be disqualified and not evaluated.

Deficiency - Deficiency is information missing or omitted within a submitted application. Examples of deficiencies include missing documents, information on a form, or some other type of unsatisfied information requirement (e.g., an unsigned form, unchecked box.). Depending on specific criteria, deficiencies may be either curable or non-curvable.
Curable Deficiency: Applicants may correct a curable deficiency with timely action. To be curable, the deficiency must:
- Not be a threshold requirement, except for documentation of applicant eligibility;
- Not influence how an applicant is ranked or scored versus other applicants; and
- Be remedied within the time frame specified in the notice of deficiency.

Non-Curable Deficiency – An applicant cannot correct a non-curable deficiency after the submission deadline. Non-curable deficiencies are deficiencies that, if corrected, would change an applicant’s score or rank versus other applicants. Non-curable deficiencies may result in an application being marked ineligible, or otherwise adversely affect an application’s score and final determination.
Content and Form of Application Submission

- **Submitted incorrectly includes** documents or forms that are blank, forms for other competitive grant programs (e.g., Indian Community Development Block Grant), or that have file extensions that are incompatible with Grants.gov.

  ✓ **Reminder:** Make sure to check that forms are compatible and have been uploaded properly to Grants.gov prior to submission!

- **Do not submit third party documents**, such as audits, general letters of support, or policies, unless specifically asked to do so. Unsolicited information will not be used when rating the applications.
Content and Form of Application Submission

- Applications for Assistance (SF-424) – (Not Curable)
- Disclosure Update (HUD-2880) – (Curable)
- Implementation Schedule (HUD-53247) (Not Curable)
- Cost Summary (HUD-53246) – (Not Curable)
- One-Page Proposal Summary – (Curable)
- Workplan Narrative and Supporting Attachments – limited to 150 pages (Not Curable)
- Budget Narrative – (Not Curable)
- Certification of Compliance - (Not Curable)
Content and Form of Application (cont...)

- Code of Conduct – (Curable)
- Environmental Review – Expression of Intent – (Curable)
- Tribal Resolution – (Curable) – HUD will also accept copies of existing Indian Housing Plan (IHP) which delegates a TDHE to submit on behalf of the tribe.
- Indirect Cost Rate – (Curable) – only if applicable
- Disclosure of Lobbying Activities – (Curable) – Only for state-recognized tribes
- Opportunity Zone (HUD 2996) – New required form only if applicable
- Certification of Consistency with Promise Zone Goals and Implementation (HUD- 50153) – Submit only if applicable
Content and Form of Application

- SF-424
- Implementation Schedule
- Cost Summary
Applications for Assistance (SF-424)

- The SF-424 must include all the information listed in the NOFO.

- **Key Contact (Block 8f):** List the contact information of the applicant’s proposed IHBG Competitive Grant Program manager. **Do not list a non-employee of the applicant,** such as a contractor/consultant grant writer.

- **Catalog of Federal Domestic Assistance Number (Block 11):** 14.867
Applications for Assistance (SF-424)

- **Proposed Project Dates (Blocks 17a-b):** The estimated period of performance start and end dates for projects awarded under this NOFO is 4/1/2022-3/31/2027.
  - Reminder: **Applicants may request a shorter period of performance** based on the project that is being proposed for IHBG Competitive funding. Projects considered under this NOFO cannot exceed 5 years.

- **Line 18a (Federal)** must list the amount requested under this IHBG Competitive Grant only. Other federal funding should not be listed.

- **Lines 18b-18f** must list any proposed leveraged funds.

- **Authorized Representative (Block 21):** Include the applicant’s authorized representative contact information (e.g., Tribal Chief, TDHE Executive Director, etc.). This **should not** be the same person listed as the Key Contact in Block 8f.
Implementation Schedule (HUD-53247) (Not Curable)

Dates listed on the Implementation Schedule must match the dates proposed on the SF-424, Blocks 17a-b.

For applications proposing multiple projects, applicant may choose to submit a separate Implementation Schedule for each project.

HUD may require successful applicants to update errors on the Implementation Schedule based on the pre-award requirement process outlined in this NOFO.
Cost Summary (HUD-53246)  
(Not Curable)

- Provides cost information including specific activity costs, administration, planning, and total resources that will be committed to the project, including resources from both Federal and non-Federal sources.

- For applications proposing multiple projects, applicant may choose to submit a separate Cost Summary form for each project.

- HUD may require successful applicants to update errors on the Cost Summary form based on the pre-award requirement process outlined in this NOFO.

- The Cost Summary totals must match the information provided on the SF-424 and Budget Narrative.
One-Page Proposal Summary

• **The applicant must include a one-page summary** of the proposed project(s), including which affordable housing activities it will implement under NAHASDA Sec. 202 and 24 CFR 1000 Subpart B.

• **The summary must also include key outcomes** the applicant will achieve (e.g., number of units constructed, rehabbed, number families targeted, etc.), should it be awarded an IHBG Competitive Grant.

• **If the applicant is a TDHE applying on behalf of multiple tribes,** then the TDHE must identify those tribes in its summary.

• **HUD will not consider any information in the summary when rating applications** and may require successful applicants to update the summary based on the pre-award requirement process outlined in this NOFO.
Workplan Narrative

The applicant must address all five rating factors listed in this NOFO – 1. Capacity, 2. Need, 3. Soundness of Approach, 4. Leveraging and 5. Comprehensiveness and Coordination

As stated in Section III.D.-Threshold Eligibility Requirements, HUD will not review applications with Workplan Narratives that do not comply with the following requirements:

- Maximum 30 pages (excluding supporting attachments and required forms);
- Double-Spaced;
- Letter-sized paper, 8-1/2 x 11 inches;
- Times New Roman 12-point font; and
- At least 1-inch margins on all sides.
- Footnotes may follow standard footnote format – 10-point font and single spaced.
- Tables may be single spaced
Workplan Narrative attachments

Applicants may provide attachments to support the Workplan Narrative. Material provided in the attachments must support the rating factors information and will not be used in lieu of information provided in response to the rating factor criteria.

Applicants are strongly urged to submit only information that is required and/or requested in the NOFO or relevant to a specific narrative response.

- The supporting attachments **must not exceed 150 pages**; supporting attachments submitted beyond the first 150 pages **will not be reviewed**.

Label each page of each attachment with a page number and with a reference to the applicable Rating Factors and Subfactors in the NOFO.

- Tip: Making sure to refer to the appropriate supporting attachment and page number in the Workplan Narrative!
Budget Narrative

• The application must include a Budget Narrative separate from the Workplan Narrative that details the eligible cost amounts and items for each budget line.

• Must match the figures on the SF-424 (Blocks 18a-g) and Cost Summary (HUD-53246)

• The narrative must provide details on eligible activities and all planning and administrative costs (including indirect costs).

• The narrative may be in any format (Word, Excel, etc.) the applicant chooses.

• If proposing multiple projects, then the applicant may submit the budget narrative separately for each project or combine it, etc.
Successful Applicants - Errors

HUD may require successful applicants to update errors on the SF-424, the Implementation Schedule (HUD-53247), the Cost Summary (HUD-53246) and the Budget Narrative based on the pre-award requirement process outlined in this NOFO.
Certification of Compliance

Each application must include a certification signed by an authorized official of the applicant addressing each of the 7 certification requirements listed on p. 20 of this NOFO.

This should be a separate, stand-alone document
Environmental Review – Expression of Intent – (Curable)

Applicants must include information on whether the tribe plans to assume environmental responsibilities under 24 CFR part 58 or decline to assume environmental responsibilities and request HUD perform the review under 24 CFR part 50, in accordance with CFR 1000.20.

Specifically, the applicant must identify WHO it wants to assume the environmental responsibilities – the applicant or HUD.

- Note: This is different than the “no choice limiting action” requirement discussed in Subfactor 3.3.

An environmental review and all approvals must be completed before funds are released and/or recipient may commit HUD or non-HUD funds.
**Tribal Certification (Curable deficiency):**

- If an application is submitted by a TDHE on behalf of a tribe, then a tribal certification or resolution on official letterhead must be submitted authorizing the TDHE to submit the application.

- HUD will accept copies of existing Indian Housing Plan (IHP) certifications that state that the tribe has delegated to the TDHE the authority to submit an IHP or application on behalf of the tribe without prior review by the tribe.

- The tribal certification or resolution must be submitted with the application.
Indirect Cost Rate (Curable deficiency):

The applicant must submit the following information if it is including indirect costs as part of the budget. Note that indirect costs will count towards the admin and planning cap!

Submit either:

1. Copy of federally negotiated IDC rate agreement:
   a) Application must clearly state the approved rate and distribution base in the Budget Narrative and amount budgeted in the Cost Summary (HUD-53246, line 5B).
   b) Must also include a letter stating the approved rate and distribution base or other documentation from the cognizant agency showing the approved rate;

2. De Minimus: If the applicant has NEVER had an indirect cost rate and wishes to use the de minimus rate, then the application must clearly state the intent to use the de minimis 10 percent of Modified Total Direct Costs (MTDC) in accordance with 2 CFR 200.414(f).
Disclosure of Lobbying Activities (SF-LLL) (Curable deficiency): State-recognized Indian tribes and TDHEs established under State law must submit this form.

Preference (Bonus) Points (Up to 2 points)

- Opportunity Zones (OZ)
- Promise Zones (PZ)

**NOTE:** Applicants can earn points for either Opportunity Zones (OZ) or Promise Zones (PZ), not both.
Preference Points – Opportunity Zones (2 points)

- Applicants proposing project in Opportunity Zone (OZ) communities must identify state, county, and census tract.
- Applicant must also provide certification to affirm investment is located in a qualified OZ.
- This form *(Certification for Opportunity Zone Preference Points)* will be included on Grants.gov for applicants to complete to earn bonus points.
- View list of designated OZ by clicking link from U.S. Department of Treasury at:

Preference Points – Promise Zones (2 points)

• Complete/submit Certification of Consistency with Promise Zone Goals and Implementation (HUD-50153).
• Signed by Promise Zone Official authorized to certify project meets criteria.
• View list of designated Promise Zones and persons authorized to certify at the website:
  https://www.hudexchange.info/programs/promise-zones/
SAMS and DUNS

1. SAM Registration Requirement

2. DUNS Number Requirement

3. Requirement to Register with Grants.gov
Application Deadline Date

Wednesday, December 1, 2021
11:59:59 pm EST
Application Submission

“Received by Grants.gov” - applicant received a confirmation of receipt and confirmation number

"Validated by Grants.gov" - application has been accepted and was not rejected with errors

HUD strongly recommends applications be submitted **48 hours before the deadline date**

Verify the contents of your submitted application to confirm grants.gov received everything you intended to submit. Tip:

**Triple check** that everything’s been uploaded properly, that files are compatible w/ grants.gov (not corrupt), triple check the application submission requirements, etc.
Paper Submission

If a request for a waiver has been submitted and approved, the date stamp would be based on when the Area ONAP receives the application.

Remember, it must be received by the deadline date. It is important that applicants coordinate with their particular Area Office to ensure a timely submission.
Funding Restrictions

1. Eligible Activities
2. Administrative and planning expenses
3. Pre-award costs
4. Consultant Cap
5. Investment of IHBG competitive funds
6. Title VI Loan Guarantees
Funding Restrictions

1. Eligible Activities

Projects funded under this NOFO are limited to eligible affordable housing activities consistent with Section 202 of NAHASDA.

Model activities under Section 202(6) of NAHASDA are ineligible under this NOFO.
2. **Administrative and planning expenses**

- Recipients granted an award in excess of $500,000 may use up to 20 percent of the 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 expenses.**

- A detailed breakdown for these costs must be included in the budget narrative.
3. Pre-Award Costs

- **With the exception of proposal costs incurred** to prepare an application for submission and the value of land acquisition used towards and applicant’s leveraging contribution, all costs, including leveraging resources, must be incurred within the period of performance dates established in the IHBG Competitive Grant Agreement.

- **Applicants requesting reimbursement of proposal costs** associated with the preparation of the IHBG competitive application **must clearly identify** this amount and activity in the narrative.

- **If successful, any proposal costs incurred that are reimbursed with grant funds** will count towards the applicant's administration and planning cap.*

*PROPOSAL COST = GRANT WRITER*
Funding Restrictions

4. Consultant Cap

IHBG Competitive Grant funds may not be used, directly or indirectly, to pay or provide reimbursement for payment of the salary of a consultant in an employer-employee type of relationship at more than the daily equivalent of the rate paid for the Level IV of the Executive Schedule. For example, the 2021 rate is $82.65/hr, $661.24/day)

For more information on the Executive Schedule, please see the Office of Personnel Management (OPM) website.
Funding Restrictions

5. **Investment of IHBG competitive funds**
   IHBG Competitive Grant funds awarded under this NOFO may not be invested pursuant to section 204(b) of NAHASDA. Applications that propose to invest IHBG Competitive Grant funds will not be funded.

6. **Title VI Loan Guarantees:** IHBG Competitive Grant funds awarded under this NOFO may not be used to fund guarantees under Title VI of NAHASDA. Applications that propose to spend funds for this purpose will not be funded.
Other Submission Requirements

Application Certifications and Assurances

Lead Based Paint Requirements
End of the NOFO Overview
Fiscal Year (FY) 2021
Indian Housing Block Grant (IHBG) Competitive Grant Application Review Training

Rating Factor 1 Review

Rating Factor 1
Capacity of the Applicant
Rating Factor Review

• This module will introduce all Rating Factors for the IHBG Competitive grant program. This review will consist of five (5) Rating Factors plus two (2) areas to earn bonus points from either Opportunity or Promise Zones for the IHBG Competitive program.
Rating Factors

1. Capacity of the Applicant
2. Need/Extent of the Problem
3. Soundness of Approach
4. Leveraging Resources
5. Comprehensiveness and Coordination
<table>
<thead>
<tr>
<th>RATING FACTOR</th>
<th>FACTOR TITLE</th>
<th>POINTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>(Minimum combined score of 35 points under Rating Factor 1 and Rating Factor 2 to meet threshold requirement)</td>
<td>20</td>
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<tr>
<td>1</td>
<td><strong>CAPACITY OF THE APPLICANT</strong></td>
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<td>1.1</td>
<td>Managerial and Technical Staff</td>
<td>8</td>
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<td>1.2</td>
<td>Procurement and Contract Management</td>
<td>2</td>
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<tr>
<td>1.3</td>
<td>IHBG Expenditures</td>
<td>2</td>
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<tr>
<td>1.4</td>
<td>Findings</td>
<td>2</td>
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<td>1.5</td>
<td>Timely Reporting</td>
<td>2</td>
</tr>
<tr>
<td>1.6</td>
<td>Late Single Audit Submissions</td>
<td>2</td>
</tr>
<tr>
<td>1.7</td>
<td>Program Performance Going Forward</td>
<td>2</td>
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<td>2</td>
<td><strong>NEED/EXTENT OF THE PROBLEM</strong></td>
<td>25</td>
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<td>2.1</td>
<td>Identified Needs and Other Supporting Data</td>
<td>9</td>
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<td>2.2</td>
<td>Project Beneficiaries</td>
<td>3</td>
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<td>2.3</td>
<td>Past Efforts to Address Identified Need</td>
<td>3</td>
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<td>Sustainability</td>
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<td>New and Previously Unfunded Applicants</td>
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<td>RATING FACTOR</td>
<td>FACTOR TITLE</td>
<td>POINTS</td>
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<td>3</td>
<td><strong>SOUNDNESS OF APPROACH</strong> (Minimum of 20 points needed to meet threshold requirement)</td>
<td>40</td>
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<tr>
<td>3.1</td>
<td>IHBG Competitive Priorities</td>
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<td>Project Implementation Plan</td>
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<td>3.3</td>
<td>Project Implementation Schedule and Project Readiness</td>
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<td>3.4</td>
<td>Budget</td>
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<td>4</td>
<td><strong>LEVERAGING RESOURCES</strong></td>
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<td>5</td>
<td><strong>COMPREHENSIVENESS AND COORDINATION</strong></td>
<td>10</td>
</tr>
<tr>
<td>5.1</td>
<td>Coordination</td>
<td>7</td>
</tr>
<tr>
<td>5.2</td>
<td>Outputs and Outcomes</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL (AFTER RATING FACTORS 1-5)</strong></td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>PREFERENCE POINTS FOR EITHER OPPORTUNITY ZONES OR</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>PREFERENCE POINTS FOR PROMISE ZONES</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL</strong></td>
<td>102</td>
</tr>
</tbody>
</table>
Rating Factor 1:

Capacity of the Applicant

Maximum total
20 points
Rating Factor 1: Subfactors

1.1 - Managerial and Technical Staff (Up to 8 points)
1.2 – Procurement and Contract Management (Up to 2 points)
1.3 – IHBG Expenditures (Up to 2 points)
1.4 – Findings (Up to 2 points)
1.5 - Timely Reports (Up to 2 points)
1.6 – Single Late Audit Submission (Up to 2 points)
1.7 – Program Performance Going Forward (Up to 2 points)
Subfactor 1.1: Managerial and Technical Staff (Up to 8 points)

- Applicants must provide a description of roles and responsibilities and knowledge and experience of KEY staff, who will plan, manage, and implement the project that will be funded with the IHBG Competitive Grant.
Subfactor 1.1: Managerial and Technical Staff (Up to 8 points)

**Knowledge** and **Experience** will be judged in terms of:

1) **Recent** – experience within the last 5 years.
2) **Relevant** – experience pertaining to **specific activities** proposed or **specific roles/responsibilities** described in the application to be relevant.
3) **Successful Experience** – experience producing measurable **impacts** on the quality and/or quantity of housing in the tribal community. Indicators of success may include a description of key **outcomes**, overall **impact** of **accomplishments**, award recognition, etc.

**NOTE:** Each (KEY) staff listed will be evaluated on 1) Recent, 2) Relevant, 3) Successful Experience criteria.
Subfactor 1.1: Managerial and Technical Staff (Up to 8 points)

Applicants must identify whether there are any potential gaps in capacity for managing and implementing the proposed project.

- Hire staff, consultants, contractors, etc.
- Detailed assessment and plan for addressing the gap
- Timeframe in addressing gap

If there are no gaps, the applicant must confirm that there are no gaps in capacity.

- No gaps identified

**NOTE:** The applicant does not need to address recent, relevant, and successful as part of the gap in capacity analysis. This criterion is only applicable to the applicant's own key staff that will plan, manage, and implement the IHBG Competitive grant.
Subfactor 1.2: Procurement and Contract Management (Up to 2 points)

• Applicants must describe **how it will implement** its procurement and contract management policies and procedures in accordance with each of the following applicable regulatory requirements.

  • **Recent amendments to 2 CFR 200 as of February 22, 2021, regarding number citations in Federal notice.**


  • Please see procurement standards from 2 CFR 200.318-326 listed on the next slide.
Subfactor 1.2: Procurement and Contract Management (Up to 2 points)

- 200.318 – General Procurement Standards (terms and conditions of contracts).
- 200.319 – Competition (full and open competition for bids).
- 200.320 – Procurement methods (how you handle micro purchases, small purchases, and proposals)
- 200.321 – Small, minority, women-owned businesses & labor surplus area firm (preferences given to these areas)
- 200.323 – Procurement of recovered materials (securing waste management services)
- 200.325 – Federal award agency or pass-through entity review (technical specification of proposed procurement reviews)
- 200.326 – Bonding Requirements (bonding requirements and procedures)
Subfactor 1.2: Procurement and Contract Management (Up to 2 points)

- Indian and tribal preference at 24 CFR 1000.48-1000.54.
  - 1000.48 – IHBG activities.
  - 1000.50 – IHBG administrative activities
  - 1000.52 – IHBG procurement
  - 1000.54 – Complaints
- Conflict of interests at 24 CFR 1000.30.
Subfactor 1.2: Procurement and Contract Management (Up to 2 points)

• Reference to copies of procurement policies and/or citing that policies meet regulatory requirements will be **INSUFFICIENT**.

• Address **each** of regulatory requirements and provide examples!

• Applicants may submit copies of policies or extracts from policies, but only as **supporting documentation** to description of how policies meet regulatory requirements.
Subfactor 1.3: IHBG Expenditures (Up to 2 points)

- There are two (2) categories for evaluating applicants for this subfactor regarding undispersed funds or investment of funds.
- **Category 1** (Not approved for investing IHBG formula funds or approved but not investing)
- **Category 2** (Approved for investing IHBG formula funds)
Subfactor 1.3: IHBG Expenditures (Up to 2 points)

• Evaluate administrative capacity of how applicant spent or invested IHBG Formula funds.

• **Category 1:** Amount of unexpended IHBG formula funds which remain in LOCCS and plan for spending undisbursed IHBG funds.

• **Category 2:** Status of invested funds and plan to use funds for affordable housing activities.
Subfactor 1.3: IHBG Expenditures (Up to 2 points)

- **HUD** will **NOT** consider
  - IHBG Formula funds awarded in **FY 2021**.
  - IHBG funds awarded under the Coronavirus Aid Relief Economic Security (**CARES**).
  - **(NEW)** IHBG funds awarded under the American Rescue Plan (**ARP**)
- Eligible applicants allocated IHBG Formula funds but neither 1) **accepted funds** nor 2) **have** a current IHBG formula recipient will automatically receive two (2) **points**.
Subfactor 1.3: IHBG Expenditures

**Category 1**

Not approved for investing IHBG funds or approved for but not investing

(Up to 2 points)

Applicants, who are NOT approved for investing IHBG funds or approved for but not investing, will be evaluated on expenditure of IHBG formula funding received in the last three (3) Federal fiscal years (FYs).

FYs 2018, 2019, and 2020. (will neither consider FY 2021 IHBG formula funding, IHBG CARES, nor IHBG ARP funding.)

In comparison with the amount of undisbursed IHBG funds remaining in LOCCS on the date this NOFO is published (August 24, 2021).
Subfactor 1.3: IHBG Expenditures

Category 1

Not approved for investing IHBG funds or approved for but not investing

(Up to 2 points)

**NOTE:** Unless providing justification for undisbursed balances, no other information required. **HUD will rely on LOCCS records** to determine remaining balance amount.

Applicant with an undisbursed balance that is more than 25 percent of IHBG formula cumulative amounts may qualify for full points under this subfactor **only if it includes a justification.**

Justification must be satisfactory to HUD.

Must demonstrate a well-developed plans to accumulate IHBG funds to carry out specific activity in the future.

Must include how recipient intends to spend undisbursed IHBG funds.

Applicants can refer to past Indian Housing Plans (IHPs), Annual Performance Reports (APRs) or related documents.
Subfactor 1.3:

IHBG Expenditures (Category 2)  
(Approved for investing IHBG formula funds) (Up to 2 points)

- Applicants, approved for investing formula IHBG funds in accordance with Section 204(b) of NAHASDA and 24 CFR 1000.58, must submit;
  - Information about its investment balances.
  - Plans to spend invested IHBG funds on affordable housing activities.
- Amount of IHBG grant funds that it currently invested.
- Investment securities and other obligations in which the funds are invested.
- Well-developed plan for spending the invested IHBG funds on affordable housing activities.
Subfactor 1.4: Findings (Up to 2 points)

- HUD will evaluate the performance of the applicant during the rating period of October 1, 2017 up to and including the NOFO publication date, which is August 24, 2021.
- Applicant must not have had any;
  - Single Audit findings during the rating period.
    - Financial management, accounting, and internal controls for HUD-ONAP programs.
    - If any single audit findings, applicant will receive zero (0) points for subfactor.
Subfactor 1.4: Findings (Up to 2 points)

- **HUD-ONAP monitoring findings** (IHBG, ICDBG, and other programs monitored by ONAP) during the rating period.

- Findings pertaining to ONAP programs from either HUD’s Office of the Inspector General **(OIG)** and/or U.S. Government Accountability Office **(GAO)** at any time during the rating period.

**NOTE**: No information required from applicant. HUD ONAP will use own records to identify any findings.
Subfactor 1.5: Timely Reports  (Up to 2 points)

- Applicants who **currently** receive **HUD-ONAP grants** under;
  - Indian Housing Block Grant (**IHBG**) formula program,
  - **IHBG** Competitive Program,
  - Indian Community Development Block Grant (**ICDBG**) program,
  - **(NEW)** COVID-19 Recovery Programs (**IHBG-CARES, ICDBG-CARES, IHBG-ARP, or ICDBG_ARP**), or
  - **Tribal HUD-VASH** program must ensure timely submission of required reports.
Subfactor 1.5: Timely Reports  (Up to 2 points)

• **Annual Performance Reports (APR),** Annual Status and Evaluation Report (ASER), and Federal Financial Report (SF-425).

• **HUD will award maximum points** to those who have submitted **all required reports** by the **submission deadlines (which includes any grant extensions)** for **all HUD-ONAP grants** during the two-year period immediately preceding the date that this NOFO is published (*August 25, 2019 to August 24, 2021*).

• **HUD will award 2 points** to applicants that **have not** received HUD-ONAP grants.

**NOTE**: No information required from applicant. HUD ONAP will use its own records to determine timely reports and how well applicants submitted reports on time.
Subfactor 1.6: Single Audit Submission (Up to 2 points)

- **(NEW)** Previously evaluated at threshold review.
- Applicants (or IHBG formula recipient) subject to the audit reporting requirements of 2 CFR part 200, Subpart F must not have any late Single Audit report submissions during the **two (2)-year period immediately preceding the date that the NOFO is published** (August 25, 2019 to August 24, 2021).
- Past fiscal year reports due during rating period already overdue as of August 24, 2021.
- Current fiscal year reports due during 2-year period but submitted late.

***Report submissions will be verified using the Federal Audit Clearinghouse (FAC) at [https://harvester.census.gov/facdissem/main.aspx](https://harvester.census.gov/facdissem/main.aspx).***
Subfactor 1.6: Single Audit Submission  (Up to 2 points)

• If audit submission delayed by COVID-19, applicant may submit evidence to Area ONAP to acknowledge delay.

• Acceptable evidence may include,
  • Voluntary Compliance Agreement (VCA)
  • Letter of Warning (LOW)
  • Evidence of Compliance (i.e., applicant’s most recent Audit Progress Report)

• Audit submission due on weekend or holiday submitted on following business day will be considered timely.

• If information from FAC is unclear, ONAP will contact applicant for more information.

• Time Zone – audit report submitted on time within location of time zone will be considered timely.

• Deadline Extension – audit report submitted within extended deadline afforded due to COVID-19 will NOT be considered late (on time).
Subfactor 1.7: Program Performance Going Forward (Up to 2 points)

- **NEW** subfactor requirement.
- How has COVID-19 impacted performance in meeting program requirements.
- Performance evaluated on plans and ability to meet submission and reporting deadline requirements.
- Brief summary on how COVID-19 has affected (or not) submission of,
  - Drawdowns
  - Closeouts audits
  - Resolution of audit and monitoring findings
  - Financial reports
  - ONAP program reports
- Process in place (or will be in place) to ensure requirements will be met.
- Estimated date of when meeting deadlines will resume.
- If applicable, explain how COVID-19 has NOT affected all or some operations and why.
- If COVID-19 has NOT hit community, discuss any plans in place to maintain submission and reporting requirements if COVID-19 happens.
End of Rating Factor 1

Capacity of Applicant
Fiscal Year (FY) 2021
Indian Housing Block Grant (IHBG) Competitive Grant Application Review Training

Rating Factor 2
Need/Extent of the Problem
Rating Factor 2: Need/Extent of the Problem

Up to 25 points
Rating Factor 2: Subfactors

2.1 – Identified Needs and Supporting Data (Up to 9 points)

2.2 – Project Beneficiaries (Up to 3 points)

2.3 – Past Efforts to Address Identified Need (Up to 3 points)

2.4 – Sustainability (Up to 5 points)

2.5 – New and Previously Unfunded Applicants (Up to 5 points)
Subfactor 2.1: Identified Needs and Supporting Data (Up to 9 points)

2.1.a. – Identified Needs  (Up to 6 points)

2.1.b. – Supporting Data (Up to 3 points)
Subfactor 2.1.a.: Identified Needs  (Up to 6 points)

• The applicant must:
• Describe in detail the need of the Indian tribe and how the project or activities will help address such need.
• Limit its description to the following factors for determining needs, as identified in this NOFO.
• Identify the following factors that are relevant to its proposed project or activities when describing need.
Subfactor 2.1.a.: Identified Needs (Continued) (Up to 6 points)

- Examples of identified need factors to address in the application. (Address only factors relevant to project);

1. American Indian and Alaskan Native (AIAN) households with housing cost burden greater than 50 percent of formula annual income in its formula area (as defined under 24 CFR 1000.32).

2. AIAN households which are overcrowded or without kitchen or plumbing in its formula area.

3. Housing Shortage in its formula area.

4. AIAN households with annual income less than or equal to 30 percent of formula median income in its formula area.

5. AIAN households with annual income between 30 percent and 50 percent of formula median income in its formula area.

6. AIAN households with annual income between 50 percent and 80 percent of formula median income in its formula area.

7. Number of AIAN person in its formula area.
Subfactor 2.1.a.: Identified Needs (Cont...) (Up to 6 points)

• Applicant must **describe** how each proposed **project or activity** will **address** each need identified.

• Example activities may **include**:  
  • New construction  
  • Infrastructure  
  • Rehabilitation,  
  • Acquisition of existing housing units that increase housing stock, or  
  • Other NAHASDA eligible activities, etc.
Subfactor 2.1.a.: Identified Needs (Continued) (Up to 6 points)

**Acquisition** - to acquire existing housing units that increases affordable housing stock, applicant must:

1) Indicate the **total number of units**;
2) Demonstrate that the new units will result in an **increase** in the **affordable housing stock** (without offset by the disposition or demolition of other affordable housing units)
Subfactor 2.1.a.: Identified Needs (Continued)(Up to 6 points)

Indian tribes that annually receive minimum needs funding must describe how:

- proposed **project or activities** will **address** the **needs** of low-income households
- needs are addressed in the certification that they are required to submit in the IHP pursuant to **24 CFR 1000.328**.
Subfactor 2.1.b.: Supporting Data (Up to 3 points)

- Identified needs supported by final published U.S. Decennial Census data and American Community Survey (ACS) data, and any other data used calculate the FY 2021 IHBG formula allocations.

- Identified needs may be supported by any data included in a successful IHBG Census challenge previously approved by HUD before August 24, 2021.

- Copy of all supporting data (including census or formula allocation) must be included in the application.

- In accordance with 24 CFR 1000.328, tribes that receive minimum needs funding because of insufficient data must certify the presence of any households are at or below 80 percent of median income in their formula area.
Subfactor 2.2: Project Beneficiaries (Up to 3 points)

Applicant must explain;

1. How eligible families will benefit from the proposed projects, and
2. The number of families that will be assisted.

- Applicant must provide supporting documentation (such as a waiting list) demonstrating that eligible families that will benefit from the project or activities being proposed either have been identified and will be able to be served with grant funds under this NOFO.

- Applicant must describe how it will identify eligible families that will benefit from the project or activities being funded in the future (such as putting a policy in place to identify eligible families).
Subfactor 2.3: Past Efforts to Address Identified Need  (Up to 3 points)

- Applicant must indicate whether it has;
  - 1) actively pursued the proposed project of similar activity in the past, or
  - 2) a new undertaking based on this NOFO.

- The narrative must include an explanation of the time elapsed since the applicant has actively pursued the project or similar eligible activity.

- If the applicant has not pursued the project in the past, then narrative should explain the reasons why it is an opportune time to actively pursue the project.

- All applicants must discuss any past or potential barriers towards implementing the project and strategies for overcoming possible hurdles if awarded IHBG competitive funds.
Subfactor 2.4: Sustainability (Up to 5 points)

The applicant must describe,

• its plans to **operate** and **maintain** the project upon completion and secure **future funding** for project.

• its plan to **ensure**, according to Section 205 of NAHASDA, that each housing unit under IHBG Competitive remain **affordable** for useful life of property.

• **(NEW)** Includes applicants proposing **infrastructure projects**, which will support affordable housing after **period of performance**.

• how the project furthers its **goals** for implementing its IHBG program.
Subfactor 2.5: New and Previously Unfunded Applicants (Up to 5 points)

• New Subfactor from FY 2020 NOFO.
• Applicant will **receive** points if it;
  • applied but did **not** receive a **FY 2018/2019** or **FY 2020** IHBG Competitive grant award, or
  • did not apply.
• Applicant (or its tribe/TDHE) will receive zero (0) points if received a **FY 2018/2019** or **FY 2020** IHBG Competitive grant award.
• HUD will also review the corresponding tribe or TDHE when awarding points.
End of Rating Factor 2 Module
FY21 Indian Housing Block Grant (IHBG) Competitive NOFO Training

Rating Factor 3: Soundness of Approach
Rating Factor 3
Soundness of Approach

Maximum total 40 points
<table>
<thead>
<tr>
<th>Rating Factor</th>
<th>Factor Title</th>
<th>Points</th>
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</thead>
<tbody>
<tr>
<td>3</td>
<td><strong>SOUNDNESS OF APPROACH</strong>&lt;br&gt;(Minimum of 20 points needed to meet threshold requirement)</td>
<td>40</td>
</tr>
<tr>
<td>3.1</td>
<td>IHBG Competitive Priorities</td>
<td>10</td>
</tr>
<tr>
<td>3.2</td>
<td>Project Implementation Plan</td>
<td>10</td>
</tr>
<tr>
<td>3.3</td>
<td>Project Implementation Schedule and Project Readiness</td>
<td>10</td>
</tr>
<tr>
<td>3.4</td>
<td>Budget</td>
<td>10</td>
</tr>
</tbody>
</table>
Subfactor 3.1- IHBG Competitive Priorities

- 3.1.a. New Housing Construction Projects
- 3.1.b. Housing Rehabilitation Projects
- 3.1.c. Acquisition of Units
- 3.1.d. Affordable Housing-Related Infrastructure Projects
- 3.1.e. Other NAHASDA-eligible activities

Maximum 10 points possible for this Subfactor
Subfactor 3.1-
IHBG Competitive Priorities

Scoring methodology:

• Step #1: HUD will calculate the percentage of funding proposed towards the eligible activity.

• Note: HUD will exclude any administration and planning costs in this calculation.
Subfactor 3.1- IHBG Competitive Priorities

Scoring methodology:

- Step #2: Multiple activities -> HUD will take the percentage of funding from Step #1 and will determine which Subfactor category (3.1a-3.1e) to apply.
- HUD will use the category that will provide the applicant with highest points.
Subfactor 3.1-IHBG Competitive Priorities

Scoring methodology (cont.):

- Acquisition projects with construction, rehab, or infrastructure costs -> rate under Subfactor depending on nature of the project proposed
  - Example: Acquisition of manufactured housing would be rated under “construction” since such housing is constructed before acquisition
- Acquisition projects without construction, rehab, or infrastructure costs -> rate under 3.1.c. Acquisition of Units
Subfactor 3.1 - IHBG Competitive Priorities

Scoring methodology (cont.):

- HUD will apply standard rounding rules. Therefore 74.5% would be rounded to 75% while 74.4% would be rounded to 74%.
Subfactor 3.1-
IHBG Competitive Priorities

• 3.1.a. New Housing Construction Projects

• Point distribution:
  • 100% of funds        10 points
  • 80-99% of funds      8 points
  • 60-79% of funds      6 points
  • 40-59% of funds      4 points
  • Less than 39%        2 points
  • Ineligible activity  0 points
Subfactor 3.1- IHBG Competitive Priorities

3.1.b. Housing Rehabilitation Projects

• **Point distribution:**
  • 75-100% of funds   7 points
  • 50-74% of funds   5 points
  • Less than 49%   3 points
  • Ineligible activity   0 points
Subfactor 3.1- IHBG Competitive Priorities

• 3.1.c. Acquisition of Units

• **Point distribution:**
  • 75-100% of funds  7 points
  • 50-74% of funds  5 points
  • Less than 49%  3 points
  • Ineligible activity  0 points
Subfactor 3.1-IHBG Competitive Priorities

• 3.1.d. Affordable Housing Related Infrastructure Projects

• Point distribution:
  • 75-100% of funds 7 points
  • 50-74% of funds 5 points
  • Less than 49% of funds 3 points
  • Ineligible activity 0 points
Subfactor 3.1-
IHBG Competitive Priorities

• 3.1.e. Other NAHASDA-eligible activities

• **Point distribution:**
  • 100% of funds 2 points
  • Ineligible activity 0 points

• **Reminder:** Model activities under Section 202(6) of NAHASDA are *ineligible* under this NOFO.
**Subfactor 3.1 - IHBG Competitive Priorities**

• Example #1: Tribe A’s Budget

<table>
<thead>
<tr>
<th>Eligible Activity</th>
<th>Budgeted Amount (Grant Request)</th>
<th>% of Funds Towards Project</th>
<th>Subfactor Options (# of Points Awarded)</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Housing Construction</td>
<td>$4 million</td>
<td>80%</td>
<td>Option #1: 3.1a. = 8 points</td>
</tr>
<tr>
<td>Housing Rehab</td>
<td>$1 million</td>
<td>20%</td>
<td>Option #2: 3.1.b = 3 points</td>
</tr>
<tr>
<td>Total Grant Request: $5 million</td>
<td>100%</td>
<td></td>
<td><strong>FINAL Score:</strong> Use 3.1a and award 8 points</td>
</tr>
</tbody>
</table>
Subfactor 3.1- IHBG Competitive Priorities

• Example #2: Tribe B’s Budget

<table>
<thead>
<tr>
<th>Eligible Activity</th>
<th>Budgeted Amount</th>
<th>% of Funds Towards Project</th>
<th>Subfactor Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Housing Construction</td>
<td>$2.5 million</td>
<td>50%</td>
<td>Option #1: 3.1a. = 4 points</td>
</tr>
<tr>
<td>Housing Rehab</td>
<td>$2.5 million</td>
<td>50%</td>
<td>Option #2: 3.1.b = 5 points</td>
</tr>
<tr>
<td>Total Request: $5 million</td>
<td></td>
<td>100%</td>
<td><strong>FINAL Score:</strong> Use 3.1b and award 5 points</td>
</tr>
</tbody>
</table>
## Subfactor 3.1 - IHBG Competitive Priorities

### Example #3: Tribe C’s Budget

<table>
<thead>
<tr>
<th>Eligible Activity</th>
<th>Budgeted Amount</th>
<th>% of Funds Towards Project</th>
<th>Subfactor Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Housing Construction</td>
<td>$1 million</td>
<td>22.2% -&gt; 22%</td>
<td><strong>Option #1:</strong> 3.1a. = 2 points</td>
</tr>
<tr>
<td>Housing Rehab</td>
<td>$3.5 million</td>
<td>77.7% -&gt; 78%</td>
<td><strong>Option #2:</strong> 3.1.b = 7 points</td>
</tr>
<tr>
<td>Admin and Planning</td>
<td>$500,000</td>
<td>_____</td>
<td>_____</td>
</tr>
</tbody>
</table>

**Total: $5 million**

*(Total in Direct Costs)*

\[ \$5,000,000-$500,000= \$4,500,000 = \$4.5 \text{ million} \]

% based on $4.5 million only

**FINAL Score:**

Use 3.1b and award **7 points**
Subfactor 3.1- IHBG Competitive Priorities  
• Example #4: Tribe D’s Budget

<table>
<thead>
<tr>
<th>Eligible Activity</th>
<th>Budgeted Amount</th>
<th>% of Funds Towards Project</th>
<th>Subfactor Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Housing Construction</td>
<td>$2 million</td>
<td>40%</td>
<td>Option #1: 3.1a. = 4 points</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Option #2: 3.1.b = 3 points</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>N/A: No option for 10% under Subfactor 3.1.e</td>
</tr>
</tbody>
</table>

**Total: $5 million 100%**

**FINAL Score:** Use 3.1a and award 4 points
Subfactor 3.2 - Project Implementation Plan (up to 10 points)
Subfactor 3.2-
Project Implementation Plan

Components:
1. Description of how the project is viable and cost-effective
2. Rational behind the project design
3. Location of the project (e.g. include a map, address and/or aerial photo), site control of location, and whether units are on fee-simple or trust land
Subfactor 3.2- Project Implementation Plan

Components:

4. Describe how applicant will comply with Indian Preference requirements

5. Infrastructure projects supporting development of affordable housing beyond:
   a. Describe plans for the housing development project(s)
   b. Anticipated completion date
Subfactor 3.2-
Project Implementation Plan

Additional criteria to address:

1. Affordability period (NAHASDA Sec. 205):
   a. Must establish minimum period for IHBG-eligible families
   b. Max points for minimum period of at least 20 years

2. Estimated cost savings due to building design, construction methods, or energy efficient measures that will be realized in future years
**Subfactor 3.2- Project Implementation Plan**

Additional criteria to address:

3. Size (square feet) and number of units

4. Type of units (e.g. number of bedrooms proposed, single-family vs. multi-family units)

**Reminder:** If applicable, include page references to any specific Workplan Narrative Supporting Attachments!
## Subfactor 3.2- Project Implementation Plan

<table>
<thead>
<tr>
<th>Scoring Criteria</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Viable and cost-effective +</td>
<td>10 points</td>
</tr>
<tr>
<td>• All components addressed in detail +</td>
<td></td>
</tr>
<tr>
<td>• Affordability period of <strong>at least</strong> 20 years</td>
<td></td>
</tr>
<tr>
<td>• Viable and cost effective +</td>
<td>7 points</td>
</tr>
<tr>
<td>• All components addressed in detail +</td>
<td></td>
</tr>
<tr>
<td>• Affordability period <strong>less than</strong> 20 years</td>
<td></td>
</tr>
<tr>
<td>• Viable and cost effective +</td>
<td>6 points</td>
</tr>
<tr>
<td>• Missing description for <strong>one</strong> component (regardless of proposed affordability period)</td>
<td></td>
</tr>
<tr>
<td>• Viable and cost effective +</td>
<td>4 points</td>
</tr>
<tr>
<td>• Missing description for <strong>2-3</strong> components (regardless of proposed affordability period)</td>
<td></td>
</tr>
<tr>
<td>• Not viable and cost-effective or</td>
<td>0 points</td>
</tr>
<tr>
<td>• Missing description for <strong>4 or more</strong> components (regardless of proposed affordability period)</td>
<td></td>
</tr>
</tbody>
</table>
Subfactor 3.3-
Project Implementation Schedule and Project Readiness
(up to 10 points)
Subfactor 3.3-
Project Implementation Schedule and Project Readiness

Implementation Schedule (HUD-53247) and Narrative Components:
1. Describe specific tasks and timelines for completing project on time and within budget.
   • Include work of both applicant and any contractors, consultants, sub-recipients, etc.
2. HUD-53247 identify each significant activity and milestones
   • List key milestones
   • Include planned start and completion dates of all tasks
3. Describe if applicant has already completed major steps
   • Environmental review
   • Proposed plans or specifications for new construction or rehab
   • Proposed site for new development
   • Initiation of bid process
   • Secured leveraged financing
   • Coordination efforts with community
Subfactor 3.3- Project Implementation Schedule and Project Readiness

4. Key milestones begin **immediately** after IHBG Competitive grant begins.

- Project Readiness = Applicant has already completed or will quickly implement key milestones.

- Key milestone examples include:
  1. Completion of environmental review
  2. Developing proposed plans or specifications
  3. Proposed site for new development
  4. Initiating bid process for procurement
  5. Securing leveraged financing (Rating Factor 4)
  6. Beginning coordination efforts (Rating Factor 5)
5. Environmental review process:
   • Applicant must ensure that no choice limiting actions will occur prior to completion of environmental review and approval of Request for Release of Funds

**NOTE:** This is different than the “Environmental Review-Expression of Intent” application submission requirement listed on p. 22 of the NOFO.
Subfactor 3.3- Project Implementation Schedule and Project Readiness

Choice limiting actions examples:

- Real property acquisition; demolition
- Disposition
- Rehabilitation
- New construction
- Site preparation or clearance
- Ground disturbance
- Leasing
### Subfactor 3.3- Project Implementation Schedule and Project Readiness

<table>
<thead>
<tr>
<th>Scoring Criteria</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Fully addressed <strong>all</strong> of the components</td>
<td>10 points</td>
</tr>
<tr>
<td>• Applicant <strong>has already completed major steps</strong> +</td>
<td></td>
</tr>
<tr>
<td>• Fully address <strong>all but one</strong> of the components</td>
<td>8 points</td>
</tr>
<tr>
<td>• Applicant <strong>has not</strong> already completed major steps+</td>
<td></td>
</tr>
<tr>
<td>• Did not fully address one of the components</td>
<td>7 points</td>
</tr>
<tr>
<td>• Did not fully address <strong>2</strong> components regardless of whether applicant has already completed major steps</td>
<td>4 points</td>
</tr>
<tr>
<td>• Did not fully address <strong>3 or more</strong> components regardless of whether applicant has already completed major steps</td>
<td>0 points</td>
</tr>
</tbody>
</table>
Subfactor 3.4-Budget
(up to 10 points)
Subfactor 3.4- Budget

HUD evaluation criteria:

1. Cost Summary (HUD-53246) and budget narrative.
2. Budget thoroughly prepared
3. Costs are eligible under NAHASDA.
4. Costs are allowable, allocable, reasonable, and necessary for implementing the project and activities.
Subfactor 3.4-Budget

HUD evaluation criteria: Definition overview

1. Eligible = costs are in keeping with NAHASDA Sec. 202.
2. Allowable = costs meet the Cost Principles criteria in 2 CFR 200 Subpart E.
   - Example of unallowable cost: alcohol and entertainment!
3. Allocable = all costs must be tied to the workplan activities and incurred within the Period of Performance, including leveraging
   - Exception: Pre-award proposal costs or land acquisition
4. Reasonable = “prudent person” test
5. Necessary = Costs crucial for implementing activities
Subfactor 3.4-Budget

Budget components:
1. Breakdown of cost estimates by line item for each proposed activity, including administration and planning costs
2. Budget calculations must be mathematically correct!
3. The SF-424, Cost Summary (HUD-53246), Budget Narrative, and supporting documentation must be consistent
Subfactor 3.4- Budget

Budget components:

4. Determine if costs for housing structures are reasonable.
   • Current Total Development Costs (TDCs), accordance to 24 CFR 1000.302 and Notice PIH-2019-19.
   • Projects meet IHBG regulatory requirements, including TDC requirements.
   • Successful applicants to meet TDC requirement prior to funding (Section B.3.K- Pre-Award Requirements).

NOTE: TDCs will not be applicable to projects under
   • Subfactor 3.1.d. Affordable Housing Related Infrastructure
   • Subfactor 3.1.e. Other NAHASDA-eligible activities
Subfactor 3.4- Budget

Budget components:

5. Budget Preparation
   • Describe qualification and experience of individual(s) that prepared the budget pertain to budget preparation.
   • Explain how the experience is recent and relevant to the proposed project.
Subfactor 3.4-Budget

Budget components:

6. Indirect costs: If applicable, applicants must demonstrate how indirect cost will be calculated in accordance with;
   • Current federally-approved negotiated rate; or
   • De minimis rate (2 CFR 200.414)

**NOTE:** Indirect costs will count toward administration and planning cap.

7. Breakdown of how leveraged resources would be used towards project (if applicable).
<table>
<thead>
<tr>
<th>Scoring Criteria</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Budget <strong>thoroughly</strong> prepared +</td>
<td>10 points</td>
</tr>
<tr>
<td>• <strong>All</strong> costs are eligible (under NAHASDA), allowable, allocable, reasonable, necessary +</td>
<td></td>
</tr>
<tr>
<td>• Applicant addressed <strong>all</strong> components in detail</td>
<td></td>
</tr>
<tr>
<td>• Budget <strong>adequately</strong> prepared+</td>
<td>8 points</td>
</tr>
<tr>
<td>• <strong>All</strong> costs are eligible (under NAHASDA), allowable, allocable, reasonable, necessary +</td>
<td></td>
</tr>
<tr>
<td>• Applicant addressed <strong>some</strong> components but <strong>some</strong> details were <strong>lacking</strong></td>
<td></td>
</tr>
<tr>
<td>Scoring Criteria</td>
<td>Points</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>• Budget adequately prepared+</td>
<td>6 points</td>
</tr>
<tr>
<td>• All costs are eligible (under NAHASDA), allowable, allocable, reasonable, necessary or,</td>
<td></td>
</tr>
<tr>
<td>• Applicant addressed some components, but some details were lacking (one entire component missing)</td>
<td></td>
</tr>
<tr>
<td>• Budget adequately prepared+</td>
<td>4 points</td>
</tr>
<tr>
<td>• All costs are eligible (under NAHASDA), allowable, allocable, reasonable, necessary+</td>
<td></td>
</tr>
<tr>
<td>• Applicant only addressed some components but some details were lacking</td>
<td></td>
</tr>
<tr>
<td>• Budget not adequately prepared+</td>
<td>0 points</td>
</tr>
<tr>
<td>• Not all cost are eligible (under NAHASDA), allowable, allocable, and necessary</td>
<td></td>
</tr>
</tbody>
</table>
End of Rating Factor 3 Module

Soundness of Approach
Fiscal Year (FY) 2021
Indian Housing Block Grant (IHBG) Competitive Grant Application Review Training

Rating Factor 4
Leveraging Resources
Rating Factor 4: Leveraging Resources (Up to 5 points)

Note: Leverage percentage will be determined by firmly committed leveraged resources (total dollar amount) divided by the total cost of the project.

<table>
<thead>
<tr>
<th>Percentage of Leveraged Resources Relative to Total IHBG Competitive Grant Projects Costs</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>25 percent or more</td>
<td>5</td>
</tr>
<tr>
<td>11 - 24 percent</td>
<td>3</td>
</tr>
<tr>
<td>5 - 10 percent</td>
<td>1</td>
</tr>
<tr>
<td>4 percent or less</td>
<td>0</td>
</tr>
<tr>
<td>Lowest American Indian Alaska Native (AIAN) per capita</td>
<td>3</td>
</tr>
</tbody>
</table>
Leveraging Resources

• No cost sharing or matching required.
• Leveraging (Federal and non-Federal) resources is encouraged.
• Applicants must provide firm commitments to be counted towards leveraging resources.
• Leveraging resources can include either cash or in-kind donations to be secured and used by the end of the period of performance.
Firm Commitment (Definition)

- **Firm Commitment** (page 10 of the Program NOFO) –
  - Letter of commitment, Memorandum of Understanding (MOU), or Agreement,
  - Applicant’s partner specifying that it agrees to perform and/or support an activity specified in the application.
  - Demonstrate the partner has the financial capacity to deliver the resources or skills necessary to implement the proposed activity,
  - Either in cash or through in-kind contributions, if HUD awards IHBG competitive funds.
  - Tribal government, public agency, foundation, or private party may provide firm commitment as a partner.
Firm Commitment (Definition)

• With the exception of land acquisition, funds expended on the project prior to the application deadline date and period of performance start dates will not be counted as leverage.

• Applicants will NOT be allowed to spend leveraged dollars before approval of the Request for Release of funds, with exceptions of acceptable pre-award leveraging,
  • Value of land acquisition
  • Proposal costs

• Leverage resources must be for the same project proposed and incurred within same Period of Performance.

• Applicants are reminded that all IHBG requirements apply to the commitment or use of both IHBG and non-IHBG funds in a leveraged project.

• Federal sources are only allowed to be used as leveraging if permitted by a program’s authorizing statute.
Examples of Leveraged Resources:

1) Tribal Resources
2) Federal Resources
3) Public Agency, Foundation or Other Private Party
4) Goods and Services
5) Land
# Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
</table>
| Tribal Resources   | • Tribal resolutions committing funds or equivalent; the resolution (or equivalent) must identify the exact dollar amount (or value of resources to be committed.)  
• For in-kind resources, specify dollar amount and method for valuation |
## Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Resources</td>
<td>IHBG formula funds (whether administered by the tribe or a TDHE):</td>
</tr>
<tr>
<td></td>
<td>• Leveraging with current program year funds:</td>
</tr>
<tr>
<td></td>
<td>o Most recently approved Indian Housing Plan (IHP).</td>
</tr>
<tr>
<td></td>
<td>o Must identify the dollar amount.</td>
</tr>
<tr>
<td></td>
<td>o Commit the IHBG resources to the project.</td>
</tr>
<tr>
<td></td>
<td>o If not currently approved in the most recent IHP, an amendment to the IHP will be processed (if awarded).</td>
</tr>
<tr>
<td></td>
<td>• Future IHBG Funding:</td>
</tr>
<tr>
<td></td>
<td>o Identify program year(s).</td>
</tr>
<tr>
<td></td>
<td>o Identify the dollar amount of IHBG funds used.</td>
</tr>
</tbody>
</table>
# Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal Resources</strong></td>
<td>Other Federal Program Funds:</td>
</tr>
<tr>
<td></td>
<td>• U.S. Department of Agriculture,</td>
</tr>
<tr>
<td></td>
<td>• Indian Health Service,</td>
</tr>
<tr>
<td></td>
<td>• Bureau of Indian Affairs,</td>
</tr>
<tr>
<td></td>
<td>• Any other Federal agency.</td>
</tr>
</tbody>
</table>

**NOTE:** If allowable by the federal program’s statute, the applicant should submit statement (e.g. letter, email, etc.) from the federal agency approving the amount of funds to be committed for leveraging.
## Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
</table>
| **Public Agency, Foundation, or Other Private Party** | • Letters of commitments which must include:  
  • The donor organization’s name  
  • The specific funds proposed  
  • The dollar amount of the financial or in-kind resource  
  • The method of evaluation  
  • The purpose of that resource with the proposed project  
  • Signed commitment from an official of the organization legally authorized to make the commitment  
  • Memorandum of Understanding (MOU), and/or agreement to participate, including any conditions to which the contribution may be subject. |
### Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
</table>
| Goods and Services | • Must demonstrate the donated items are necessary to the actual development of the project.  
                          • Must include comparable costs that support donation value. |
## Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
</table>
| Land               | • Tribal resolution or certification clearly identifies land value and method used to determine land value will be acceptable.  
                      • Land valuation must be established using one of the following methods and the documentation must be contained in the application.  
                      • The application of land valuation documentation must state the method used to determine land value and identify the land value. The methods include:  
                        • A site-specific appraisal no more than two years old.  
                        • An appraisal of a nearby comparable site also no more than two years old.  
                        • A reasonable extrapolation of land value based on current area realtor value guides.  
                        • A reasonable extrapolation of land value based on recent sales of similar properties in the same area. |
<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
</table>
| Land               | • Land valuation must be established using **one of the following methods** and the documentation must be contained in the application.  
• The application of land valuation documentation must **state the method used** to determine *land value* and **identify the land value**.  
• Land **previously used** as leverage towards other ONAP competitions may **not be proposed** as leverage for this NOFO. |
Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The methods used to determine value include:</td>
</tr>
<tr>
<td></td>
<td>• A <em>site-specific appraisal</em> no more than two years old. <em>Tax assessments</em> will be considered appraisals.</td>
</tr>
<tr>
<td></td>
<td>• An <em>appraisal of a nearby comparable site</em> also no more than two years old.</td>
</tr>
<tr>
<td></td>
<td>• A <em>reasonable extrapolation of land value</em> based on <em>current area</em> realtor value guides.</td>
</tr>
<tr>
<td></td>
<td>• A <em>reasonable extrapolation of land value</em> based on recent sales of <em>similar properties</em> in the <em>same area</em>.</td>
</tr>
</tbody>
</table>
## Leveraging Resources

<table>
<thead>
<tr>
<th>Leveraged Resource</th>
<th>Evidence/Documentation Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land</td>
<td>Land previously used as leverage towards other ONAP competitions may not be proposed as leverage for this NOFO.</td>
</tr>
</tbody>
</table>
Leveraging Resources (SF-425):

- Grantees will be required to show evidence that leveraging resources were actually received and used for their intended purposes through quarterly reports (SF-425) as the project proceeds.
Leveraging Resources (Unavailable resources):

• HUD recognizes that in some cases, the applicant cannot receive a firm commitment of non-tribal funds by the application deadline.

• If so, the applicant must include a statement from the contributing entity that describes why the firm commitment cannot be made at the current time.

• Statement must say that the tribe/organization and proposed project meets the eligibility criteria for receiving the leveraged funds.

• Statement must also include a date by which the funding decisions will be made, which cannot be over six (6) months from the anticipated date of grant approval by HUD.
Leveraging Resources (Evidence):

• If the applicant does not provide HUD with evidence of the firm commitment from the original leverage source or an alternative source within 6 months of the date of grant approval, or if anticipated leverage is not provided, HUD will re-rate and re-rank the application with the updated lower leverage.

• If the application is no longer fundable after re-rating and re-ranking the application, HUD will rescind the grant and recapture grant funds.
Leveraging Resources (Percentage):

• HUD will award points based on percentage of leveraged resources committed relative to (total) IHBG Competitive project costs.

• Applicants who propose leveraging but do not provide firm commitment documentation for those (particular) sources of leveraging, those sources of leveraging will not be included in the total leverage resources amount.
Leveraging Resources (Percentage):

Percentage % =
Total Leverage Resources (Firmly Committed Dollar Amount) / Total Grant Project Costs
Leveraging Resources (Percentage):

Percentage % will be determined by:
- Total Leveraged Dollar Amount (leverage attachments)
- Application for Federal Assistance (SF-424)
### Leveraging Resources (Percentage):

**SF-424, page 3 (Line 18 (Estimated Funding))**

<table>
<thead>
<tr>
<th>18-Estimated Funding ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>18a-Federal</td>
</tr>
<tr>
<td>18g-Total</td>
</tr>
</tbody>
</table>
**Leveraging Resources (Percentage):**

**Percentage Calculation Sample 1:**

<table>
<thead>
<tr>
<th>Leverage Entry</th>
<th>Dollar Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tribal Resolution (tribal funds)</td>
<td>$1,000,000</td>
</tr>
<tr>
<td>IHBG Future Funds ($100,000/year/5 years)</td>
<td>$500,000</td>
</tr>
<tr>
<td>Land (land appraisal)</td>
<td>$167,000</td>
</tr>
<tr>
<td><strong>Total Dollar Amount Firmly Committed = Leveraged Amount</strong></td>
<td><strong>$1,667,000</strong></td>
</tr>
<tr>
<td>Total Grant Requested (SF-424 (Line 18a))</td>
<td>$5,000,000</td>
</tr>
<tr>
<td><strong>Total Project Costs=</strong></td>
<td></td>
</tr>
<tr>
<td>Total Grant Requested + Leveraged Amount</td>
<td><strong>$6,667,000</strong></td>
</tr>
</tbody>
</table>
Leveraging Resources (Percentage):

Percentage Calculation Sample 1:

Percentage % =

- Total Leveraged Amount/Total Grant Project Costs
- $1,667,000 / $6,667,000 = .25 or 25%
- Leveraged Percentage equals 25%
- Applicant will receive 5 points
- Earned percentage is at 25%
Leveraging Resources (Percentage):

Percentage Calculation Sample 2:

<table>
<thead>
<tr>
<th>Leverage Entry</th>
<th>Dollar Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tribal Resolution (tribal funds)</td>
<td>$500,000</td>
</tr>
<tr>
<td>IHBG Current Future Funds</td>
<td>$300,000</td>
</tr>
<tr>
<td>Private Party</td>
<td>$200,000</td>
</tr>
<tr>
<td><strong>Total Dollar Amount Firmly Committed</strong></td>
<td><strong>$1,000,000</strong></td>
</tr>
<tr>
<td>= Leveraged Amount</td>
<td></td>
</tr>
<tr>
<td>Total Grant Requested (SF-424 (Line 18a))</td>
<td>$4,000,000</td>
</tr>
<tr>
<td><strong>Total Project Costs=</strong></td>
<td></td>
</tr>
<tr>
<td>Total Grant Requested + Leveraged Amount</td>
<td><strong>$5,000,000</strong></td>
</tr>
</tbody>
</table>
Leveraging Resources (Percentage):

Percentage % =

• Total Leveraged Amount/Total Grant Project Costs
  • $1,000,000 / $5,000,000 = 0.20 or 20%
  • Leveraged Percentage equals 20%
  • Applicant will receive 3 points
  • Earned percentage between 11 and 24%
Leveraging Resources (Economic Distress):

• Indian tribes and TDHEs with significant challenges leveraging funds
• Severely distressed economic, housing and infrastructure conditions in tribal communities.
• HUD 2017 Housing Needs Study
• American Indian and Alaska Native (AIAN) reservations and tribal area with severe problems.
• Remoteness, lack of infrastructure, complex legal constraints related to land ownership.
• Difficulty in improving housing conditions.
• Challenges lead to inability to leverage funds.
Leveraging Resources (Economic Distress):

• Three (3) points awarded to applicants that have difficulty leveraging funds.
• Access AIAN incomes in each Indian tribe’s IHBG formula area.
• Three (3) points awarded to **bottom 25 percent** of Indian tribes that received FY 2020 IHBG Formula funding.
• Lowest AIAN per capita income.
• Area AIAN per capita income determined lesser of multi-race or single-race estimate in IHBG formula area
• 2011-2015 American Community Survey (ACS) data.
Leveraging Resources (Economic Distress):

• HUD has provided a list of all tribes at the website https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg_cgp (under the link Tribal Area PCI RF4 Resource Only), which include per capita income estimates.

• Report will indicate which Indian tribes that will qualify for the three (3) points under Leveraging Resources.
Leveraging Resources (Economic Distress):

• Please view sample chart below

<table>
<thead>
<tr>
<th>tribcode</th>
<th>Office</th>
<th>Tribe Name</th>
<th>Per Capita Income (25th percentile threshold is LE $11,227)</th>
<th>Qualify for leverage (0=No; 1=Yes)</th>
<th>Source for lowest Per Capita Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>20010</td>
<td>ALASKA</td>
<td>Tribe A</td>
<td>$12,850</td>
<td>0</td>
<td>Formula Area single</td>
</tr>
<tr>
<td>20020</td>
<td>CHICAGO</td>
<td>Tribe B</td>
<td>$7,862</td>
<td>1</td>
<td>Census tribal area single</td>
</tr>
<tr>
<td>20030</td>
<td>DENVER</td>
<td>Tribe C</td>
<td>$11,117</td>
<td>1</td>
<td>Census tribal areas multi</td>
</tr>
<tr>
<td>20040</td>
<td>OKLAHOMA</td>
<td>Tribe D</td>
<td>$8,454</td>
<td>1</td>
<td>Census tribal areas multi</td>
</tr>
<tr>
<td>20050</td>
<td>PHOENIX</td>
<td>Tribe E</td>
<td>$16,820</td>
<td>0</td>
<td>Census tribal area single</td>
</tr>
<tr>
<td>20060</td>
<td>SEATTLE</td>
<td>Tribe F</td>
<td>$18,348</td>
<td>0</td>
<td>Census tribal area single</td>
</tr>
</tbody>
</table>

• Column E (Qualify for Leverage (0=No; 1=Yes)) will determine, which tribe/TDHE will qualify for points.
• If tribe/TDHE listed indicates “1” under Column E, then applicant will qualify for 3 points under Leveraging Resources.
• If tribe/TDHE listed indicates “0” under Column E, then applicant will not qualify for 3 points, in which leverage percentage requirements will apply.
End of Rating Factor 4 Module
Fiscal Year (FY) 2021
Indian Housing Block Grant (IHBG) Competitive Grant Application Review Training

Comprehensiveness & Coordination and Preference (Bonus) Points
Rating Factor 5: Comprehensiveness & Coordination

Up to 10 points
Subfactor 5.1: Coordination (Up to 7 points)

- The applicant must address how it has designed the project and plans to implement it in coordination with community members, tribal departments, and other agencies/organizations.
- The applicant must describe its long-term vision for the project and how it will continue in the future.
Subfactor 5.2 – Outputs & Outcomes (Up to 3 points)

The applicant must;

• Include outputs and outcomes it strives to achieve with the project and,
• Describe outputs and outcomes in detail.
Outputs – are measured in the volume of work accomplished and must be identified by each key task proposed in the workplan.

Examples of outputs could include but are not limited to:
- Number of housing units constructed;
- Number of housing units rehabilitated;
- Number of housing units acquired to increase the affordable housing stock;
- Number of homeownership units constructed or financed;
- Number of units connected to utilities (e.g., gas, phone or electric lines/roads/water/sewer, etc.);
- Number of persons assisted; and
- Number of jobs created.
Outcomes – are measured by the impact achieved from the outputs of the proposed project. Outcomes should be quantifiable measures or indicators that identify the change in the community, people’s lives, economic status, etc.

Examples of outcomes could include but are not limited to:

• Reduction in the number of families living in substandard housing;
• Reduction in overcrowding;
• Increase in homeownership rates;
• Reduction of drug-related crime or health-related hazards;
• Improved accessibility for person with disabilities; and
• Improved energy efficiency.
Preference (Bonus) Points (Up to 2 points)

- Opportunity Zones (OZ)
- Promise Zones (PZ)

**NOTE:** Applicants can earn points for either Opportunity Zones (OZ) or Promise Zones (PZ), **not both.**
Preference Points – Opportunity Zones (2 points)

- Applicants proposing project in Opportunity Zone (OZ) communities must identify state, county, and census tract.
- Applicant must also provide a certification form to affirm investment is located in a qualified OZ.
- This form **Certification for Opportunity Zone Preference Points (HUD-2996)** will be included on Grants.gov for applicants to complete to earn bonus points.
- View list of designated OZ by clicking link from U.S. Department of Treasury at:

Preference Points – Opportunity Zones (update)

- Please download most recent updated package in Grants.gov.
- Updated **Certification for Opportunity Zone Preference Points** form is included in application package.
- Please view updated **Certification for Opportunity Zone Preference Points** form on Codetalk.
- Applicants that receive waivers to submit paper applications can print and submit **Certification for Opportunity Zone Preference Points** form with application.
- Please view Dear Tribal Leader (DTL) letter (dated 9/9/2021) posted on Codetalk for more information.
Preference Points – Promise Zones (2 points)

• Complete/submit Certification of Consistency with Promise Zone Goals and Implementation (HUD-50153).

• Signed by Promise Zone Official authorized to certify project meets criteria.

• View list of designated Promise Zones and persons authorized to certify at the website:
  
  https://www.hudexchange.info/programs/promise-zones/
End of Rating Factor 5
For Fiscal Year (FY) 2021, the Indian Housing Block Grant (IHBG) Competitive Program Training will be conducted.

The program will cover a range of post rating factors to ensure comprehensive training for participants.
Review and Selection Process

- Past Performance
- Assessing Applicant Risk
- Applicant Selection Process
Review and Selection Process

Past Performance

Assessing Applicant Risk

HUD standard language and requirements in evaluating applications for funding.
Review and Selection Process

Applicant Selection Process

- This section identifies the process applications go through:
- Screening and Acceptance - applications will be screened if they are:
  1. Received or submitted in accordance with the requirements of this NOFO.
  2. The applicant is eligible to submit an application.
  3. The proposed project is eligible.
  4. The application contains all of the applicable components listed in Section IV. B. of this NOFO.
Review and Selection Process

- **Threshold Compliance (Section III.D. p. 13-15)**
- **Past Performance** – Rating Factor 1
- **Rating** - ONAP will review and rate each project that meets the acceptance criteria and threshold requirements

**Minimum Points**
- Minimum of **combined** score of 35 points in RF 1 and RF 2
- Minimum 20 points in RF 3,
- Overall minimum total of 75 points (without the addition of Preference Points)
Ranked Order

- Eligible applications that meet minimum score requirements will be placed in ranked order.
- HUD will award funds in rank order based on score received on the application.
- HUD will consider applicants for funding within fundable range of 75 or more points in ranked order up.
- Amount requested or lesser amount if sufficient funds are not available.
Grant Award Adjustments

- If not enough funds are available to fully fund a project, then HUD may contact the applicant to determine whether revisions can be made to the program budget and workplan to reflect the actual award offer.
- If no agreement can be made on a revised budget and workplan, then the award will NOT be made.
- HUD may offer award, in rank order, to another applicant.
- HUD may also select an additional applicant for funding if additional funds be available.
Tiebreakers

HUD will use the following factors to resolve the tie:

1. Approval of projects that can be fully funded verses project that cannot be fully funded.

2. Projects that address IHBG Competitive Priorities, which HUD will prioritize according to rating criteria order under Subfactor 3.1.

3. Applicants that score highest points from combined scores for Rating Factor 1 (Capacity of Applicant) and Rating Factor 2 (Need/Extent of Problem)
IHBG Competitive Grant Progress and Performance:

- Failure to make significant progress by September 30, 2023.
- Evidence by failure to meet planned activities described in IHBG Competitive workplan.
- Substantial noncompliance under 24 CFR 1000.534.
- HUD will review each circumstance case by case basis to determine substantial noncompliance.
Additional IHBG Competitive Funds:

- If additional funds become available, HUD may:
  - Award funding to additional applicants based on score from competition
  - Use additional funds to provide additional funding to an applicant awarded less than the original amount
  - Fund additional applicants eligible to receive award but for which no funds were available from FY 2021 appropriations; and
  - Award funding to applicants that meet funding error category in Section VI.A of this NOFA.
Review and Selection Process

Curable Deficiencies and Pre-Award Requirements

Curable Deficiencies - If there are curable deficiencies, the applicants must satisfactorily address deficiencies before HUD can make grant award.
Pre-Award Requirements

Successful applicants may have to provide supporting documentation concerning management, maintenance, operation or financial of projects before grant agreement execution.

- Additional information regarding implementation of project.
- Information to verify commitment of resources to complete project.
- Notification to applicant by either facsimile (fax) or U.S. Postal Service, return receipt requested.
- **14 calendar days** from receipt date of HUD notification for response.
Pre-Award Requirements (cont.)

- No extensions provided.
- No response or insufficient response will result in a withdrawal of the grant offer.
- No substitute of new projects from original project proposed in application.
- Time period for calculating the response deadline begins on the day after recipient of the pre-award letter from ONAP.
**Agency Errors**

Judgements made with provisions of this NOFA and all program statutory and regulatory requirements are not subject to claim of error.

- No appeal process.
- Applicant may bring arithmetic error in application scoring.
- Thirty (30) days of being informed of score.
Anticipated Award Dates
Approximately 4-6 months after the application due date
Award Notices

- Administrative, National and Department Policy Requirements for HUD recipients

VI. Award Administration Information

- Reporting
  - Post-Award Reporting Requirements
    a) Quarterly Financial Reports (SF-425)
    b) Annual Performance Report (APR)

- Debriefings
VI. Award Administration Information

**Award Notices**

- HUD will notify successful applicants of their selection for funding.
- HUD will notify applicants whose applications were received by the deadline date but not chosen for award.
- Notifications sent by email to person listed as Authorized Official Representative (AOR) in Item 21 of the SF-424.
VI. Award Administration Information

Award Notices (Continued)

Negotiation:
• After selection, HUD will negotiate specific terms funding agreement and budget of selected applicants.
• If HUD and selected applicant do not successfully conclude negotiations in timely manner or applicant fails to provide information, no award will be made.
• HUD may select another eligible applicant and may impose special conditions on award according to 2 CFR 200.207.
VI. Award Administration Information

Award Notices (Continued)

Adjustments to Funding:

- HUD reserves right to fund applications less than amount requested.
- HUD will fund no portion of application that,
  - Is not eligible for funding
  - Does not meet requirements
  - Duplicates other funded programs or activities from prior year awards or other selected applicants
VI. Award Administration Information

Award Notices (Continued)

Adjustments to Funding (cont.):

- HUD may fully or partially fund another eligible, fundable application, if funds are available after funding the highest-ranking application.
- If funds remain, funds may be made available within the current FY for other program competitions.
Award Notices (Continued)

Funding Errors:

- If HUD commits error that when corrected would cause selection of an applicant for funding, HUD will select that applicant based on availability of funds.
- The HUD Reform Act prohibits HUD from notifying applicants of grant awards before the announcement of all successful award recipients.

*Reminder: There is no appeal process. However, an applicant may bring arithmetic errors in application scoring to the attention of HUD within 30 days of being informed of its score.
VI. Award Administration Information

Award Notices (Continued)

- ONAP will send applicant an award letter and grant agreement to sign and return.
- Applicant must establish an account in LOCCS to draw down funds to complete project/activities.
- Grantees will be encouraged to participate in an award Implementation training conducted by ONAP.
- Environmental review: All required notifications, and approval of the Request for Release of Funds and Certification when applicable under 24 CFR part 58 or HUD's approval of the project or activity under 24 CFR part 50, must be completed before a recipient may commit HUD or non-HUD funds.
VI. Award Administration Information

Administrative, National and Department Policies for HUD recipients

The NOFA lists the applicable Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards. These are also available at HUD’s Funding Opportunity page:

https://www.hud.gov/program_offices/spm/gmgt/grantsinfo/fundingopps
VI. Award Administration Information

IHBG Competitive Grant Program-
Post Award Reporting Requirements.

Quarterly Federal Financial Reports (SF-425s)

1. Submit to Area ONAP within 30 days after end of each quarter.
2. Must show leveraging resources received and used.
3. Submit final SF-425 within 90 days after end of period of performance identified on grant agreement.
VI. Award Administration Information

IHBG Competitive Grant Program-Post Award Reporting Requirements

Annual Performance Reports (APRs) (HUD-52737)

- Submit to HUD within 90 days after end of the program year
- Submit to HUD within 90 days after end of period of performance identified on grant agreement.
- Pertain only to IHBG Competitive grant activities.
- Submit separate from traditional IHBG Formula reports.
- Must include separate narrative with APR addressing the following areas (next slide);
VI. Award Administration Information

Reporting

Narrative submitted with APR must address the following:

1. Progress made on completing project
2. List of work remaining towards project completion
3. If applicable, minor modifications to grantee’s workplan and budget to meet project goals, which must be in accordance with this NOFO and subject to HUD approval
4. If applicable, discussion of any identified gaps capacity in managing grant, in accordance to detailed assessment
5. If applicable, discussion of barriers faced toward project implementation and explanation on how grantee will overcome barriers to complete project by end of period of performance
Reporting

Narrative submitted with APR must address the following (cont.)

6. Update of how project is addressing need factors identified in grant application
7. Progress of efforts to implement project in coordination with community members, tribal departments, and other agencies/organizations
8. Discussion of outputs and measurable outcomes achieved to date
9. Report of obligations and expenditures compared w/ remaining funding LOCCS balances or successor system
10. Status of leveraging resources committed to project; and
11. After project is done, evaluation of effectiveness in meeting affordable housing project needs.
VI. Award Administration Information

Debriefing

- Period of at least 120 days
- Beginning 30 days after public announcement of awards
- HUD will provide debriefing upon request from applicant
- Request for debriefing must be made in writing or by email
- Authorized Official whose signature appear on SF-424 or by his or her successor
- Submitted to Point of Contact (POC)
VI. Award Administration Information

Debriefing
Information provided may include:

- Final score received after rating factor review
- Final evaluator comments from each rating factor
- Final assessment of application based on funding approved or denied
VII. Agency Contacts

IHBGCompetitiveProgram@hud.gov
VIII. Other Information

- National Environmental Policy Act (NEPA)
- Paperwork Reduction Act (PRA)
- Web Resources
Questions? Contact IHBGCompetitiveProgram@hud.gov

Keep an eye on the ONAP Codetalk website: https://www.hud.gov/codetalk
Recorded training modules
Updated training materials
FAQs

Thank you for your interest in the IHBG Competitive Program!