

**HUD Office of Native American Programs
Indian Community Development Block Grant
FY2022 Notice of Funding Opportunity
Frequently Asked Questions
Updated 10/12/2022 - Updates in red**

The following Frequently Asked Questions (FAQs) have been provided to assist applicants to the Fiscal Year (FY) 2022 Indian Community Development Block Grant (ICDBG) Notice of Funding Opportunity (NOFO).

**Section I – Funding Opportunity Description
Changes from Previous NOFO**

- 1. Q: Is the citation listed on page 5 of the NOFO, in the Changes from Previous NOFO, Section III.D. Threshold Eligibility Requirements for Economic Development projects, incorrect?**

A: Yes. The correct citation is IV.B.1. k, instead of IV.B.1.l.

- 2. Q: Where can I find the examples of evidence that are referenced on page 5 of the NOFO, in the Changes from Previous NOFO, regarding Submissions for Land Acquisition to Support New Housing Projects?**

A: The NOFO does not list examples of evidence for this submission item. The information in the Changes section is incorrect.

- 3. Q: Is the updated Fiscal Year date on page 6 of the NOFO, in the Changes from Previous NOFO, Rating Factor 2, Subfactor 2.4: New and Unfunded Applicants, incorrect?**

A: Yes. The Fiscal Year date is incorrect and was cited in error. The correct updated Fiscal Year dates are FY2017, FY2018, FY2019-2020 or FY 2021, instead of FY 2015.

- 4. Q: Can you provide additional clarification on what ‘must principally benefit Low-to-Moderate Income (LMI)’ and ‘70% of the grant funds must be used for LMI’s. Do either of those requirements mean that funds may be used for other than LMI households?**

A: Yes, title I of the Housing and Community Development Act of 1974 (the Act) establishes as its primary objective the development of viable communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. Consistent with this objective, not less than 70 percent of the expenditures of each single purpose grant shall be for activities which meet the criteria set forth in [paragraphs \(a\), \(b\), \(c\) and \(d\)](#) of 24 CFR 1003.208.

- 5. Q: Is the information on page 6 of the NOFO, in the Changes from Previous NOFO, Rating Factor 3, Subfactor 3.4.b: Economic Development Projects, incorrect?**

A: Yes. The information is incorrect and was cited in error. The language referencing excellent and fair was not removed. However, the word “average” was removed, and replaced with the word “reasonable.”

Section III – Eligibility Information

- 6. Q: Is it acceptable to submit a draft Tribal Resolution with the application submitted by a tribal organization on behalf of an Indian tribe, then submit a fully executed Tribal Resolution after the application due date?**

A: No. If a tribal organization defined in 24 CFR 1003.5(b) will submit on behalf of the Indian tribe, an official, current Tribal Resolution authorizing a tribal organization to submit on behalf of the Tribe must be submitted with the application. Omission of that item is not a curable deficiency. See NOFO, Section IV B.1.f, page 26.

- 7. Q: If the applicant does not submit a Tribal Resolution stating the citizen participation requirements were followed in accordance with 24 CFR 1003.604 for the proposed project, is that curable?**

A: No. In Section IV.B.1.d. of the NOFO, page 26, the citizen participation requirement is not listed as a curable deficiency, and the ICDBG regulations state “prior to submission of the application to HUD, the applicant shall certify by an official Tribal resolution...” (See 24 CFR 1003.604(b)). As such, a current tribal resolution stating that Citizen Participation requirements were followed in accordance with 24 CFR 1003.604 must be submitted with the application.

- 8. Q: Are State Recognized Tribes eligible to apply for the ICDBG NOFO and the Imminent Threat Grant?**

A: A very limited number of State Recognized Tribes are eligible under the terms of the eligibility requirements described in the NOFO. Please contact your Area Office of Native American Programs (AONAP) if you would like to confirm your Tribe’s eligibility status.

- 9. Q: If my Tribe applies for the ICDBG Imminent Threat grant, do we have to submit the entire application required for single purpose grants or a different application?**

A: The application requirements for the ICDBG Imminent Threat grants can be found in [ONAP Program Guidance 2018-04](#), “Imminent Threat Grants” and [24 CFR part 1003 Subpart E](#). Imminent Threat funds are awarded on a first-come first-serve basis until the amount set aside for the fiscal year is fully awarded. The Imminent Threat request must be submitted to your local AONAP, in accordance with the Guidance cited above. The application requirements differ from the application requirements for single purpose grants.

10. Q: If the Tribe chooses to apply for an ICDBG single purpose grant and they are not successful, can a tribal organization still apply or does the tribal organization application get disqualified?

A: Either the Tribe or the tribal organization can apply, but not both. HUD will not review an application submitted by a tribal organization on behalf of a specific Tribe if the Tribe itself submits an application for the same funding round.

11. Q: When will the FY2022 NOFO be released? What is the deadline for the application?

A: The U.S. Department of Housing and Urban Development (HUD) published the FY2022 ICDBG NOFO on July 29, 2022. The deadline to apply is October 24, 2022.

12. Q: Can a Tribe apply for both the Single Purpose Grant and the Imminent Threat Grant?

A: Yes. The ICDBG NOFO announces the application process for the ICDBG Single Purpose grant. For the ICDBG Imminent Threat grant, please see [ONAP Program Guidance 2018-04](#), “Imminent Threat Grants” and the requirements in [24 CFR part 1003 subpart E](#).

13. Q: Regarding the letter that is required from the Bureau of Indian Affairs (BIA) or Indian Health Service (IHS), does this only apply to tribal organizations? How can we find out if HUD has this letter?

A: Yes, the letter is only required for tribal organization applicants. See Section III.A. of the NOFO, which states that “the Bureau of Indian Affairs (BIA) or the Indian Health Service (IHS), must provide a letter that states that the tribal organization is eligible under Title I of the Indian Self Determination and Education Assistance Act. A copy of this letter must be included in your application submission, unless your organization has already provided such a letter in previous years approved by HUD and the status of your tribal organization has not changed.” Please contact your AONAP *prior* to the application deadline to verify whether this letter is on record. In addition, a tribal resolution authorizing a tribal organization to submit on behalf of a Tribe must be submitted with the application.

14. Q: Can nonprofit organizations apply? If so, do they have to submit their own application or partner with a Tribe?

A: According to 24 CFR 1003.5(b), tribal organizations which are eligible under Title I of the Indian Self- Determination and Education Assistance Act may apply on behalf of any Indian Tribe, band, group, nation, or Alaska Native village eligible under that Act for funds under this NOFO when one or more of these entities have authorized the tribal organization to do so through concurring resolutions. HUD will not review an application submitted by a tribal organization on behalf of a specific Tribe if the Tribe itself submits an application for the same funding round (See NOFO, pg. 16).

15. Q: Is the repair of an airport runway an eligible activity for the ICDBG NOFO?

A: No. With limited, specific exceptions, ICDBG regulations provide that any expense associated with repairing, operating, or maintaining public facilities, improvements, and services is ineligible. The repair of an airport runway would be an ineligible operating and maintenance expense. See 24 CFR 1003.207(b)(2)(i), which states that examples of ineligible operating and maintenance expenses are “maintenance and repair of streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, centers for persons with disability, parking, and similar public facilities.”

16. Q: There is very little specific information in the NOFO about the types of economic development projects that might qualify. Is there somewhere other than the NOFO that has more information about the kinds of projects allowable under the program? What might be considered allowable costs for these projects under the grant?

A: The NOFO does not include specific examples of ICDBG-assisted economic development projects; however, there have been grocery stores, marinas, travel centers, fish processing plants, to name a few, funded with ICDBG. To view activities funded by activity type or region, visit the Best Practices section on Codetalk. Also, see 24 CFR part 1003 Subpart C and 24 CFR 1003.302(c) for additional information regarding eligible activities and Economic development projects.

17. Q: We are hoping to purchase a back-up generator to provide support to water treatment plants in the event of a loss of power. Per the ICDBG funding announcement, we read that equipment is not an eligible purchase, but we are wondering whether this project falls under the equipment category.

A: As stated in 1003.207(b)(1), the purchase of equipment with ICDBG funds is generally ineligible. While there are certain types of equipment that are eligible, the purchase of a back-up generator is ineligible.

18. Q: This question is regarding the Public Service section. If we apply as a tribal organization that has not received funds, but the Tribe has, can we propose a "quantifiable increase" or would we only qualify if the service was new?

A: As a tribal organization applying on behalf of a Tribe, we will treat the tribal organization as the Tribe for this requirement. So, in this situation, you could propose a quantifiable increase. Per 24 CFR 1003.201(e), to be eligible for ICDBG assistance, a public service must be either a new service, or a quantifiable increase in the level of an existing service above that which has been provided by or on behalf of the grantee through funds raised by the grantee or received by the grantee from the Federal government in the twelve calendar months before the submission of the application for ICDBG assistance. (An exception to this requirement may be made if HUD determines that any decrease in the level of a service was the result of events not within the control of the grantee.)

19. Q: Can ICDBG be used to fund property acquisition, plus planning and design costs for a new single family housing construction project, where ICDBG funds will not be used for the construction costs?

A: Yes. According to 24 CFR 1003.201, federal funds can be used for *acquisition*. Acquisition in whole or in part by the grantee, or other public or private nonprofit entity, by purchase, long-term lease, donation, or otherwise, of real property (including air rights, water rights, rights-of-way, easements, and other interests therein) for any public purpose, subject to the limitations of 24 CFR [1003.207](#).

20. Q: Can funds be used to install solar arrays on low-income houses?

A: Yes. Per 24 CFR 1003.202, funds can be used for rehabilitation services on low-income public housing and other publicly owned residential buildings and improvements. In addition, per 24 CFR 1003.202(b)(4), ICDBG funds can be used for improvements to increase the efficient use of energy in structures through such means as installation of storm windows and doors, siding, wall and attic insulation, and conversion, modification, or replacement of heating and cooling equipment, including the use of solar energy equipment.

21. Q: If funded for an infrastructure project would the organization be allowed to charge a small entry fee? For example, for qualifying individuals there would be no fee, however those that do not meet the income guidelines may have to pay a small fee for use.

A: Yes. Per 24 CFR 1003.201(c)(2), *fees for use of facilities*, reasonable fees may be charged for the use of the facilities assisted with ICDBG funds, but charges such as excessive membership fees, which will have the effect of precluding low- and moderate-income persons from using the facilities, are not permitted.

22. Q: Can ICDBG funds be used to rehab NAHASDA units whose occupants were income eligible at the time of move-in, but are not low-income currently?

A: No. When determining income eligibility, the occupant must be income eligible for the improvements or benefit from the ICDBG funds at the time the ICDBG funds are expended (See 24 CFR 1003.208.(c)(2)).

23. Q: Does a social services building, police station, or court building count as public facilities? Clarification is needed because crime prevention and social services count as public services.

A: Buildings that are used for the general conduct of government are ineligible. However, some buildings may be eligible based on the location and who is mainly being served (e.g., Police Substation). It is best to talk to your Grants Management Specialist to help you determine if the proposed building would be eligible. (See 24 CFR 1003.201(a), 24 CFR 1003.207(a)(1), and 24 CFR 1003.4, definition of “Buildings for the general Conduct of government”).

Section IV – Application and Submission Information

24. Q: In Section IV.B.1.i. and j, on page 26 of the NOFO, are Housing Rehabilitation Projects and New Housing Construction Projects subject to certain Threshold Requirements, as is the case for Economic Development?

A: Yes, both have Threshold Eligibility Requirements in Section III.D.6.c. and d, on page 19 of the NOFO. In accordance with 24 CFR 1003.302(c), you must provide an analysis which shows public benefit commensurate with the ICDBG assistance requested will result from the assisted project.

25. Q: Is the rehabilitation of a private home eligible for ICDBG if the resident is LMI?

A: Yes. ICDBG funds may be used for the rehabilitation of privately owned buildings and for improvements for residential purposes. However, the homeowner must be LMI at the time of service. See 24 CFR 1003.202(a)(1).

26. Q: What's the purpose of the CBDO? How do we go about to receive a CBDO? This will be our first time submitting an application.

A: Community Based Development Organizations (CBDOs) are generally non-profit organizations that engage in community development activities (which may include housing and economic development activities) of Community Development Block Grant (CDBG)-funded activities. CBDOs can be for-profit or nonprofit organizations but cannot be governmental entities. A CBDO may be designated as a subrecipient by the grantee. Please contact your Area ONAP to determine CBDO approval status. See 24 CFR 1003.204(c) and NOFO requirements on page 26.

27. Q: For Infrastructure Projects (New Housing), the NOFO states “you must submit evidence that the housing will be completed within three years of the grant award.” What constitutes acceptable evidence?

A: As stated in the NOFO on page 27 under Infrastructure Projects, evidence can include contract agreements, including construction and infrastructure contractor agreements, implementation timelines, and budget details that support when the housing project will be completed.

28. Q: Is there an example of how the Implementation Schedule and Implementation Schedule Narrative should interact?

A: An applicant must submit an Implementation Schedule (form HUD-4125) and can include a narrative description of the Implementation Schedule in the Workplan Narrative. Together, the Implementation Schedule and narrative description of the Implementation Schedule in the Workplan Narrative must include a detailed breakdown of the tasks needed to complete the project, as described in subfactor 3.3. Keep in mind that there is a 30-page maximum length for the Workplan Narrative. See NOFO, Section IV. B.1.c, page 25.

Example of Narrative Description of Implementation Schedule:

Project Implementation Plan

Please see the attached HUD-4125 Project Implementation Schedule (attachment D) for a breakdown of the tasks needed to complete this project. The project assumes a start date of March 25, 2023 and anticipates a close date of March 25, 2028. Project staff will present progress updates to the Executive Director, not less than monthly, to ensure the day-to-day work performance will result in a timely completion of the project. Once the grant funds are received, the project team will proceed according to the Implementation Schedule:

- *Upon receipt of the Notification of Award Letter, any pre-award or special conditions will be addressed including environmental review per 24 CFR part 58.*
- *By XXXX, the design plans will be finalized and any adjustments requiring HUD notification will be submitted to HUD.*
- *Phases of rehab will be conducted on the noted units between XXXX and XXXX.*
- *Quarterly and annual financial and progress reporting will be submitted to HUD on the dates noted.*
- *Final walk-through inspections will be completed by XXXX.*
- *Grant Closeout will start by XXX and be completed by XXXX.*

Note that for applications proposing multiple projects, applicants must submit a separate Implementation Schedule for each project (See NOFO, page 22-23 under section IV, B, 1).

29. Q: Is the Budget Narrative included within the Workplan Narrative, or as an attachment?

A: Applicants must include a Budget Narrative. The Budget Narrative may be included as a separate attachment from the Workplan Narrative and does not count towards the 30-page limit for narratives. Please see that the Budget Narrative includes a breakdown and description for each budget line, including all sources and uses of funding for the proposed project(s). See NOFO, Section IV.B.1.c, page 25 for more information on the Budget Narrative.

30. Q: The Budget Narrative calls for details on indirect costs. What more should be included aside from the amount?

A: Please refer to Section IV.B.1.q of the NOFO for detailed instruction regarding indirect cost. Also refer to the description of the Budget Narrative submission at Section IV.B.1.c: "...breakdown of each budget line... must provide details on... all planning and administrative costs (including indirect costs) ..." Finally, ensure you are including the details on indirect costs that affect your score at Subfactor 3.2 Budget (see NOFO, page 53).

31. Q: If we use excel, does the Budget Narrative have to be 12-point font, and double spaced?

A: No. The NOFO states that Narratives and other attachments must be no more than 30 pages in length, and must be double-spaced, 12-point Times Roman font with at least 1-inch margins on all sides (See NOFO, page 29). However, the NOFO states that the Budget Narrative does not count towards the 30-page limit for narratives, and Excel spreadsheets and photographs do not need to follow the spacing or font requirement.

32. Q: Do applicants need to comply with the threshold item on Affirmatively Furthering Fair Housing (AFFH) on pg. 18 of the NOFO, at Section III.D.2?

A: No. The NOFO sets forth a threshold item on AFFH on pg. 18 of the NOFO, at Section III.D.2. It states that there are some exceptions for federally recognized Indian tribes and their instrumentalities, but isn't clear as to whether the threshold applies to the ICDBG NOFO. It does not.

Section V – Application Review Criteria
Rating Factor 1

31. Q: In Rating Factor 1, Subfactor 1.1, how would we go about discussing contractors if our contractors have not been determined prior to submission?

A: Contractors' expertise would only need to be described if the contractors are key staff in planning, managing, and implementing projects in accordance with the implementation schedule for which funding is being requested. Knowledge and experience will be judged in terms of recent, relevant, and successful experience for each key staff. Additionally, the applicant must either provide an assessment and plan for addressing identified gaps in capacity for managing and implementing the proposed project or the applicant confirmed there were no gaps in staff capacity for managing and implementing the proposed project (See NOFO, Section V, RF1, Subfactor 1.1). So, if a contractor is a key staff that has not yet been determined, that discussion should take place as part of the analysis on gaps in capacity.

32. Q: In Rating Factor 1, Subfactor 1.1, can you define a capacity gap?

A: A capacity gap is a disparity between an organization's goals and objectives (as expressed in its vision and mission) and its actual or potential ability to achieve its vision and mission. If the project's success requires expertise that is not held by the current staff and a contractor or consultant is required to provide that expertise, the capacity gap is identified and addressed by contracting for that expertise.

33. Q: In Rating Factor 1, Subfactor 1.4, there is a range of 2 CFR 200.318-327 regulatory requirements. Do Tribes have to address all those requirements?

A: Applicants should clearly describe how they implement their procurement and contract management policies and procedures in accordance with the following:

- General procurement standards at 2 CFR 200.318-327 (excluding 200.322 and except that 200.326 shall only apply under the terms of 24 CFR 1003.501(a)(8))
- Indian and tribal preference at 24 CFR 1003.510; and
- Conflict of interest at 24 CFR 1003.606.

See page 41 of the NOFO for additional detail.

Rating Factor 2

34. Q: How does a project obtain resilience points?

A: In order to obtain resilience points, the project needs to address a threat identified in a Hazard Mitigation Plan or other vulnerability assessment. HUD encourages applicants to inquire within the Tribe, such as with the Tribal Environmental Department, to determine if the Tribe has developed a Hazard Mitigation Plan or other vulnerability assessment and consider how the project addresses any identified vulnerability.

A Hazard Mitigation Plan/vulnerability assessment may identify rising sea level and extreme weather events that will increase flooding. A housing project could address this vulnerability by elevating the building. Or perhaps a Hazard Mitigation Plan/vulnerability assessment identifies increased wildfire risk. A project that builds a community center that includes fire-resistant construction and creates a defensible space would address this vulnerability. HUD's [Community Resilience Toolkit](#) is a resource to learn how to address vulnerabilities.

35. Q: What is Hazard Mitigation Plan or vulnerability assessment? And are some resources available to help develop these?

A: A Hazard Mitigation Plan or vulnerability assessment is a process for evaluating how the community could be affected by climate change and natural hazards where the Tribe identifies natural hazards including the effects of climate change.

For a listing of resources, see HUD's [Tribal Climate Resilience and Adaptation Resources](#).

36. Q: How can an infrastructure project meet ICDBG's climate resilience points?

A: The infrastructure project must address a vulnerability identified in a Hazard Mitigation Plan or vulnerability assessment. For instance, if a Tribal community is affected by sea level rise and extreme weather events that increase flooding, a road that is elevated above projected flooding will maintain emergency egress during flood events. A microgrid project that is a local energy grid with control capability could address a Tribe's vulnerability to loss of energy due to risks from wildfire or extreme weather.

37. Q: In Rating Factor 2, Subfactor 2.2, is an infrastructure project that supports new housing considered a housing project? In other words, will the demographic requirements be needed?

A: This would be categorized as a Subfactor 2.2.a infrastructure project and the demographic information would be required. Subfactor 2.2.c addresses new housing construction, but does not specify that it covers infrastructure for new housing construction.

38. Q: What is the Needs Table referenced in Rating Subfactor 2.2c? How do I find it and how is it used?

A: The Needs table is located in the zip file with the Application Instructions for the ICDBG program when you download your application from grants.gov, or on Codetalk here: [FY 2022 ICDBG Needs Table](#). The Needs Table is used to score Subfactor 2.2.c.

SYNOPSIS
VERSION HISTORY
RELATED DOCUMENTS
PACKAGE

Select Grant Opportunity Package

PLEASE READ BEFORE APPLYING!
 If you view and complete your application package using Grants.gov downloadable PDF forms, you **MUST** have a current version of Adobe Reader. To prevent a validation error, it is now recommended you uninstall any earlier versions of Adobe Reader. If more than one person is working on the PDF forms, **ALL** applicants must be using the same Adobe Reader version.

Opportunity Package(s) Currently Available for this Funding Opportunity:

CFDA	Competition ID	Competition Title	Opportunity Package ID
14.862	FR-6600-N-23	Community Development Block Grant Program for Indian Tribes and Alaska Native Villages	PKG00276224

39. Q: In Rating Factor 2, Subfactor 2.5, do you have to address both Carbon Reduction and Resilience Projects to receive points?

A: No. Projects may be either Carbon Reduction or Resilience, or a combination.

40. Q: For Subfactor 2.5 Connection to Climate Change, can we receive the maximum 4 points allowed by building homes with solar panels?

A: Applicants may be able to receive the 4 points allowed under subfactor 2.5 by building homes with solar panels if the following criteria on page 50 of the NOFO are met (bolding for emphasis added):

- You identified one or more projects and fully described in detail the measures that will be incorporated in each project **and how it will advance carbon reduction;** and
- **Your project or projects are not limited to weatherization or energy efficiency,** and include one or more of the following:
 - You describe a structure that either includes certification through a Green and Resilient Building Standard or that uses building material or construction techniques that reduce carbon emissions (may include traditional, sustainable materials and techniques); and/or
 - You describe a project that is built with voluntary Federal, State, Local or tribal energy efficiency initiative; and/or
 - You describe a project that incorporates low carbon energy sources such as solar or wind.

41. Q: In Rating Factor 2, Subfactor 2.5, how will you evaluate projects that have both Carbon Reduction and Resilience elements?

A: The reviewers will evaluate for both point categories and assign points according to the lowest-scoring category.

Rating Factor 3

42. Q: In Rating Factor 3, subfactor 3.1, Description of and Rationale for Proposed, are there repetitive bullet point criteria? Do we need to address both?

A: Bulleted criterion indicating “You explain your rationale for project design, for example health and safety, or climate resilience;” was added to both the 10 and 5 points descriptions, in order to include examples. There is also a bulleted criterion indicating “You explain your rationale behind the project design.” You do not need to address both.

43. Q: In Subfactor 3.1, what would be the best way to show cost effectiveness?

A: Because of the variety of projects allowed under the ICDBG NOFO, the best way to show cost effectiveness would depend on the proposed project. For example, for some projects cost effectiveness can be shown by describing and providing cost savings in percentage or dollar amounts resulting from building design or construction methods, or energy efficiency measures that will be realized in future years.

44. Q: In Rating Factor 3, subfactor 3.2, is the budget preparer and the cost estimator the same person, as referenced under this subfactor?

A: Yes. The descriptive paragraph in 3.2 references “the individual(s) that prepared the budget.” The point criteria reference “the person who prepared the cost estimates” and the “cost estimator.” Ensure you follow the points’ criteria and describe the qualifications and the experience of the person who prepared the cost estimates and cost estimator.

45. Q: Where should the information on the qualifications and experience of the staff member that created the budget be listed, in the Budget Narrative or the Workplan Narrative?

A: It should be listed in the Workplan Narrative (See NOFO, Rating Factor 3, Subfactor 3.2, page 53). Note that the "staff member that created the budget" is identified as "the cost estimator" in Subfactor 3.2.

46. Q: Is a re-development of streets project an infrastructure project or community development application?

A: Infrastructure. The NOFO refers to roads projects as infrastructure, for example in Rating Factor 3, Subfactor 3.4.

47. Q: In Rating Factor 3, subfactor 3.1, Land for Future Housing projects, the NOFO indicates that the application must establish that there is a reasonable ratio between the number of usable acres to be acquired and the number of LMI households to benefit from the project. Please explain what is considered to be a reasonable ratio.

A: The NOFO asks the applicant to establish reasonableness. That said, in reviewing this subfactor, no more than 1 acre per home will be considered reasonable. Other ways to establish reasonableness could be how the proposed density compares with average density in a particular area/community, or how the land cost affects total project costs.

48. Q: Is the analysis for public benefit requested in Subfactor 3.4.b a separate report, or is it to be included in the Workplan Narrative?

A: The analysis for subfactor 3.4.b is not a separate report and must be included in the Workplan Narrative. However, there is no specific format for the analysis, which must be done in accordance with 24 CFR 1003.302(c), which requires that applicants provide an analysis which shows public benefit commensurate with the ICDBG assistance requested will result from the assisted project. that analysis may be in a report format as long as it is included in the Workplan Narrative and not submitted separately.

Rating Factor 4

49. Q: Should Public Service costs be included before calculating the percentage of leverage funds?

A: Yes, Public Service costs should be included before calculating the percentage of leverage funds. The NOFO does not specify to exclude Public Service costs. Instructions and an example for calculating the percentage of leverage costs is provided for you on page 61 of the NOFO.

50. Q: Can the land valuation for leverage be provided by the applicant or does it need to be provided by a third party?

A: Applicants should use an extrapolation of value based on recent sales that have been provided by a licensed local realtor. They should not use Zillow or other such websites that aggregate real estate listings, since the data on these websites may not be current or accurate.

51. Q: Can you use land that was previously funded for an ICDBG infrastructure only project as leverage for an ICDBG housing construction project?

A: No, land that has been used as leverage towards other ONAP competitions cannot be used. (See NOFO, Section V, Rating Factor 4).

52. Q: Can you give an example of a "Realtor Value Guide"?

A: Applicants should contact a Certified Realtor to obtain land value information.

53. Q: Can Treasury Emergency Rental Assistance (ERA) funds able to be leveraged with ICDBG funds?

A: Yes. Treasury has confirmed that ERA funds can be used for leverage, [via a published FAQ](#). To satisfy the ICDBG NOFO requirement to submit a statement from the federal

agency approving the amount of funds to be committed for leveraging, the applicant needs to submit their last submitted ARPA-SLFRF report to demonstrate their spending plan.

54. Q: If the leveraged funds are from IHBG for an upcoming application to IHBG for FY2022, what is required for the leverage rating factor?

A: If future IHBG funds will be used, then the application must identify the program year and the dollar amount of IHBG funds that will be used (See NOFO, Section V, Rating Factor 4 Chart).

55. Q: Is it possible to use ICDBG funds for the remaining of a single-family housing construction project that was funded with IHBG, and for the IHBG funds to count as leverage?

A: ICDBG funds may be used for the remainder of the project, but the IHBG funds may not count towards leverage. With the exception of the value of land acquisition and direct costs of submitting a proposal, funds that have been expended on the project prior to the Period of Performance start date will not be counted as leverage. Additionally, leverage resources must be for the same project that is proposed and incurred within the same timeframe/Period of Performance as the proposed project. (See NOFO, Section V, Rating Factor 4).

56. Q: Can ICDBG-ARP and IHBG-ARP funds be leveraged with ICDBG?

A: Yes. Both ICDBG-ARP and IHBG-ARP can be leveraged.

57. Q: Can you define the difference between administrative costs and indirect costs? Does the NOFO say you can use proposal costs covered by non-ICDBG as leverage? If so, is that considered a direct cost, not program administration?

A: Administrative costs are described in the ICDBG regulation at 24 CFR 1003.206 and indirect costs are defined in the regulation at 2 CFR 200.1. Indirect costs are incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Per the NOFO and ICDBG regulations, no more than 20 percent of the sum of any grant plus program income received can be expended for program administration costs and planning activities described in 24 CFR 1003.206 and 24 CFR 1003.205. Both the indirect costs for the applicant and any other direct administrative expenses would fall under the 20% cap, except this cap does not apply to staff and overhead costs directly related to carrying out activities eligible under 24 CFR 1003.201 through 1003.204.

In Rating Factor 4, the NOFO states that leveraged resources do not include indirect costs. It also states that proposal costs can be acceptable leverage. Please ensure you are familiar with how indirect costs are charged to the grant, so that your application aligns with it and the applicable requirements in the NOFO. If grant proposal expenses are not charged to the grant as indirect costs, the cost of developing the proposal can be charged to the grant as a direct administrative cost, per 24 CFR 1003.206(d).

Rating Factor 5

58. Q: In Rating Factor 5, Subfactor 5.2, does including outputs and outcomes mean providing actual numbers and percentages?

A: Yes, the applicant must provide actual numbers and percentages to obtain points for this subfactor. These should be quantifiable measures or indicators that identify the change in the community, people's lives, economic status, etc.

59. Q: In Rating Factor 5, Subfactor 5.1, is the text correct? It appears to be calling for applicants to identify and describe how they plan to coordinate and work on the project with organizations that will not be providing leveraged funds to the project.

A: Yes, this language is correct. An applicant receives points for leverage in Rating Factor 4. Although you may also coordinate the project with entities providing leveraged funds/resources, the language in Rating Factor 5 is looking for a well thought out strategy with community support and coordination in planning, needs determination, and other aspects of the work in the project. Activities and actions described in Rating Subfactor 5.1 discuss the alignment of the project with policy goals and strategic plans of the community the applicant will be serving. The Indian Housing Plan (IHP), prepared annually and found in compliance by the AONAP, is an example of a strategic plan. Coordination with other Tribal Departments counts as coordination with other organizations. The methods/process used to engage the community in the project to meet the Citizen Participation requirements of 24 CFR 1003.604 must also be described.

General ICDBG questions

60. Q: Where can I find the training slides or a recording of the FY 2022 ICDBG NOFO Training?

A: The [FY 2022 ICDBG Training Slides](#) and a recording of the FY 2022 ICDBG Grantee NOFO Training, among other ICDBG resources, are available on ONAP's Codetalk website on the [ICDBG page](#).

61. Q: Is there a limit on how old an Environmental Review can be?

A: HUD policy is to recommend a new environmental review every five years, or sooner if/when environmental conditions change.

62. Q: Can grant funds be used to complete the Environmental Review?

A: Yes. The cost of environmental reviews, including costs incurred in complying with any of the related laws, is eligible to the extent allowable under the HUD assistance program regulations. See 24 CFR 58.23. The ICDBG NOFO discusses environmental review costs as an eligible cost/activity in several places.

63. Q: Previously, a Tribe was limited to the number of open ICDBG awards at any given time. Is there a limit in this NOFO?

A: The NOFO does not limit the number of open ICDBG awards that a recipient could have at a given time. However, under Rating Factor 1, capacity will be scored in part based on performance on previous ICDBG awards including ICDBG IT grants (ICDBG CARES and ARP grants are excluded). Also, applicants can only get points at Rating Factor 2.4, New and Unfunded Applicants, if they have not had a recent ICDBG grant.