



HUD Office of Native American Programs
FY 2025 Indian Housing Block Grant Competitive Grant Program
(IHBG-COMP) [Notice of Funding Opportunity](#) (NOFO)
Published September 4, 2025

Frequently Asked Questions

The following Frequently Asked Questions (FAQs) have been provided to assist applicants for the Fiscal Year (FY) 2025 IHBG Competitive Grant NOFO. You are welcome to send questions via email to IHBGCompetitiveProgram@hud.gov.

Key Dates:

NOFO Training: See www.hud.gov/codetalk.

Application Due Date: 11:59:59 PM, Eastern Time on Thursday, January 15, 2026

Anticipated Award Date: Wednesday, June 17, 2026

Expected Period of Performance: July 1, 2026 to June 30, 2031 (5 years)

Q1: Where can I find a summary of the changes from the FY 2024 IHBG-COMP NOFO?

HUD has made significant changes to the HUD NOFO Template as well as the IHBG-COMP rating factors and scoring criteria since the last NOFO. The rating factors were restructured to simplify the application process. The scoring criteria were changed to focus on IHBG-COMP program priorities, including project feasibility and assessment of past performance. Starting on page 12 of the NOFO is a full summary of changes. (See Section III. Program Description, Part F. Program History)

Q2: If a Tribally Designated Housing Entity (TDHE) was awarded on behalf of a Tribe in prior competitions, can the TDHE apply again and receive full points if applying on behalf of another Tribe?

Yes, but only if the TDHE is applying on behalf of a Tribe that has never received awards under any previous IHBG Competitive Grants. See subfactor 2.4

Q3: How can the application package be downloaded from the [Grants.gov](https://www.grants.gov) website?

The IHBG Competitive grant opportunity is available here: [FR-6900-N-48](https://www.grants.gov/grants/FR-6900-N-48). Please make sure that you are using the required forms that are provided on Grants.gov as you prepare and complete your grant application.

Q4: If an applicant is applying for multiple projects, is an Implementation Schedule, Cost Summary, Project Plan, and Budget Narrative required for each project?

If you propose multiple projects, you must provide a Project Plan, Budget Narrative, Implementation Schedule, and Cost Summary for each project, however you do not need to submit a separate form or attachment for each project. The Cost Summary totals must match the information provided on the SF-424 and Budget Detail. The primary project is the one with the greatest share of the budget, and under some subfactors only the primary project will be scored. See the NOFO for more details.

Q5: Would you prefer that the supporting attachments for the Project Plan be put in one file, then just reference the page number, or should they be submitted as separate attachments with referenced page numbers?

The choice to upload separate attachments or a single large attachment is up to the applicant, but clear labeling, numbering, and referencing to the applicable rating factor and subfactor must be used in either case. You may submit supporting documentation like maps, waiting lists, building plans, etc. though applicants are strongly urged to submit only information that is required or requested in the NOFO. Attachments must support the rating factors and will not be used in lieu of information required to be provided in response to the rating factors. Do not submit files containing personal information such as social security numbers or files that are encrypted or password protected. If HUD cannot open or read the document, it will not be reviewed. Keep in mind that your entire submission should not exceed 150 pages; required forms are not included in this page limit.

Q6: Can HUD funds be used for environmental reviews?

Yes, these expenses may be chargeable to the award as a Planning and Administration cost or a direct project cost if the costs are directly related to the eligible activity. All awards under this NOFO will be conditioned on the successful completion of an environmental review; no award funds will be released before the completion of the environmental review.

Q7: What Total Development Cost (TDC) amounts apply to this NOFO?

A recipient must either use the TDC limits published by HUD or adopt written standards for its affordable housing programs that reflect the requirement specified in 24 C.F.R. § 1000.156. **Notice PIH 2024-28:** Total Development Cost (TDC) for Affordable Housing Under NAHASDA provides the maximum amount of funds that may be used for affordable housing, effective August 9, 2024. If HUD has published updated TDCs at the time applications are reviewed, HUD will use those TDCs when reviewing applications.

Q8: If an applicant needs a TDC determination for a project based on [Notice PIH-2024-28](#) because the development includes buildings with more than four units, does this determination need to be approved and included in the application?

No, the determination is not required at the time of submission. HUD will evaluate whether the costs are reasonable by using the current TDC Notice as a reference, where applicable. Applicants are reminded that projects must meet all IHBG regulatory requirements, including TDC requirements. HUD will ensure that successful applications meet TDC requirements prior to funding.

Q9: Is grant writer compensation to prepare the IHBG grant an allowable expense in this grant?

Yes. Costs associated with the preparation of the IHBG Competitive application will be considered pre-award costs and must clearly be identified by the amount in the Cost Summary and as an activity in the Budget Narrative. Any proposal costs incurred that are reimbursed with grant funds will count toward the applicant's administration and planning cap.

Q10: How do environmental review requirements apply when an applicant is acquiring or has acquired land prior to an award?

Per HUD environmental review requirements, an environmental review for a project must be completed before funds are released, and before any choice limiting actions are taken. If a successful applicant acquires land prior to an award, the acquired land must be included in the environmental review before the funds are released. See [24 CFR part 50](#) or [24 CFR part 58](#) for more information.

Q11: Explain "no choice limiting actions" in relation to environmental review requirements.

Choice limiting actions refer to any action that could limit the choices available to resolve an issue identified during the environmental review process. In accordance with [24 CFR Part 58](#), choice limiting actions include activities such as acquisition, demolition, rehabilitation, repair, new construction, site preparation or clearance, ground disturbance, and leasing. Choice limiting actions may not occur prior to the completion of an environmental review.

Q12: What labor standards apply to funds under this program?

Recipients will be required to comply with all labor standards that apply under the IHBG formula program, as further described in section 104(b) of NAHASDA and [24 CFR § 1000.16](#). Recipients must ensure that they are applying the appropriate applicable wage rates (e.g., Davis-Bacon wage rates, HUD-prevailing wage rates, or tribally determined wage rates) depending on the activities that will be carried out under this program.

Q13: Is training for [Grants.gov](#) available?

Please see the training resources page on [Grants.gov](#) available at [grants.gov/learn-grants/](#).

Q14: What is Build America, Buy America Act (BABA)?

Build America, Buy America Act (BABA) was enacted as part of the Infrastructure Investment and jobs Act. BABA established the Buy America Preference (BAP), for certain infrastructure projects funded with Federal awards. The preference requires that all iron, steel, manufactured products, and construction materials purchased for covered projects using Federal awards be manufactured in the United States. See the [Notice PIH 2024-35: Build America, Buy America Act \(BABA\) – Implementation Guidance for Tribal Recipients](#).

Q15: Do the Build America, Buy America Act (BABA) requirements apply to IHBG Competitive Funding?

Yes, BABA may apply to any federally funded project that involves the construction, alteration, maintenance, or repair of public infrastructure. However, note that housing projects consisting of 1 to 4 dwelling units are classified as private homes for personal use under BABA and are not subject to the Buy America Preference (BAP). Housing projects containing 5 or more dwelling units should be considered public infrastructure under BABA and are subject to the BAP. To determine if BAP is applicable to a project, which HUD general waivers may apply to a project, how to document BAP compliance, or how to submit a specific waiver request for approval, see [Notice PIH 2024-35](#).

Q16: Is there a new version of the Implementation Schedule and Cost Summary that must be used?

Yes, the new Cost Summary (HUD-4123) and Implementation Schedule (HUD-4125) are now combined in a fillable excel spreadsheet that will be required for both the IHBG-COMP and ICDBG grant applications starting with the FY 2025 NOFOs. This combined form is available in grants.gov and via the links above in the form names. These were updated to correlate information between the forms and standardize the forms for both competitions.

Q17: Are there any other changes to required forms?

As part of the HUD-wide NOFO Template updates, the following forms are now required:

- Indirect Cost Information for Applicants/Recipients ([HUD-426](#))
- Certification for a Drug-Free Workplace ([HUD-50070](#))
- Application Assurances- Construction ([SF-424D](#)).

Note that the following forms are *no longer required* for the FY2025 IHBG-COMP NOFO:

- Expression of Intent- Environmental Review
- Certification of Compliance (ONAP specific).

Q18: What changes were made to Rating Factor 3: Past Performance?

Applicants with remaining CARES or ARP funds will score 0 points for subfactor 3.1. Undisbursed ONAP Funding. The published NOFO was revised to extend the end of the Rating Factor 3 assessment period from September 30, 2025, to the application due date of January 15, 2026. This provides additional time to address undisbursed funds.

Q19: How can applicants ask additional questions regarding the FY 2025 IHBG-Comp grant?

Please email us at IHBGCompetitiveProgram@hud.gov.