
Tribal HUD-VASH
Frequently Asked Questions for
Tribes and Tribally Designated Housing Entities
June 2025



About this guidance: These Frequently Asked Questions (FAQs) are designed to streamline and organize the questions and guidelines regarding the Tribal Housing and Urban Development Veterans Affairs Supportive Housing (HUD-VASH) program. This version of FAQs includes new ones as well as prior ones, some of which have been updated. The Office of Native American Programs (ONAP) will continue to update the FAQs as needed.

Please note that subsequently issued guidance (e.g., Public and Indian Housing (PIH) Notices, ONAP waivers, etc.) may supersede this FAQ.

Please send any communication via e-mail. For a directory of ONAP staff and offices, please visit hud.gov/codetalk and select the link “Contact ONAP Staff and Tribes,” which you can find under the “Popular Topics” section. You can also send any questions on the Tribal HUD-VASH program to: TribalHUDVASH@hud.gov.

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Program Foundations

1. What is the difference between “at risk of homelessness” and “homelessness”?

For purposes of Tribal HUD–VASH, HUD is adopting the definitions of “Homeless” in Section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#)) and “At Risk of Homelessness” in Section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)). **However, the income provision at [42 U.S.C. 11360\(1\)\(A\)](#) does not apply to the Tribal HUD–VASH program.** Instead, HUD is adopting the low-income eligibility requirements in Section 4(14) of the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA). Accordingly, a veteran will be eligible for this program if he or she otherwise meets the definition of “Homeless” or “At Risk of Homelessness,” and is a low-income Indian, as defined in NAHASDA (i.e., has an income that is no more than 80 percent of area median income for the Indian area as determined by HUD)

2. What are eligible uses of the administrative fees?

You can only use the administrative fees to pay for administrative and planning expenses related to this program, which include, but are not limited to:

- A. eligibility determinations
- B. intake and briefings
- C. owner outreach efforts
- D. unit inspections
- E. rent negotiations
- F. annual and interim reexaminations
- G. tenant fraud investigations and hearings
- H. processing subsequent moves
- I. the costs associated with making rental assistance payments to owners
- J. complying with reporting requirements.

You can find more information under Section (VI)(M) “Administrative Fee and Reserve Accounts” at: [Tribal HUD-VA Consolidation Notice](#).

3. Can you use administrative fees for rental assistance?

Yes. If, after you have paid all of your Tribal HUD-VASH administrative expenses, you can use the remaining amount to help pay for the rental assistance provided by the Tribal HUD-VASH program.

4. Tribal HUD-VASH grantees provided the number of bedrooms in each housing unit in their original application. Can you change the number later on?

Yes. You can change the number of bedrooms in a housing unit during the renewal process. Please make sure to include such a change in your renewal application.

5. Can I request a higher Fair Market Rent (FMR)? What is the approval process?

Yes. The [Consolidation Notice](#) states, “If a tribe/Tribally Designated Housing Entities (TDHE) deems it necessary to charge more than 110 percent of FMR (or to place a Veteran in a privately-owned unit with a rent that exceeds 110 percent of FMR), it must obtain HUD’s prior approval to do so.”

Please submit your request to your assigned [AONAP Grants Management Specialist](#). When you submit your request:

- A. You must deem it necessary to charge more than 110 percent.
- B. You must provide a justification on why more than 110 percent must be charged, such as:
 - (i) Rental market conditions. This may include limited availability of housing stock, local rental market conditions, unit operating costs, or other market conditions.
 - (ii) To address a request for reasonable accommodation for a person with disabilities.

6. What types of housing can the Tribal HUD-VASH program support?

The Tribal HUD-VASH program is intended to provide rental assistance for Veterans, no matter the type of housing. As such, that can include permanent housing with a lease, such as single-family housing units and housing units in a multi-unit complex, as well as single room occupancy; congregate housing; a group home; shared housing; cooperative housing, and residential treatment housing.

Please note that you can only use the Tribal HUD-VASH grant to pay for rental assistance. If there are other costs associated with housing the Veteran (e.g., medical care in an assisted living facility), then these costs must be paid from other sources.

Please note additionally that you should consider whether the housing is covered by insurance, such as residential treatment housing, before determining to use Tribal HUD-VASH rental assistance.

7. How can Tribes and TDHEs apply for a Tribal HUD-VASH grant?

Contingent on appropriations, funding is available every year to existing grantees for renewal grants. Tribes and TDHEs that are not already Tribal HUD-VASH grantees cannot apply for renewal grant awards. Information on the renewal process, including example and template documents, are posted on the [Tribal HUD-VASH website](#).

Funding is not regularly available for new grantees. If funding becomes available, HUD will publish a notice with details of how to apply. [Subscribe to Codetalk](#) for the latest updates.

Training

8. Are training and technical assistance available for the Tribal HUD-VASH program?

Yes. Both training and technical assistance are available. The Office of Native American Programs hosts different training sessions throughout the year. You can find recordings of prior

training sessions by visiting [Tribal HUD-VASH](#) and selecting the link “Training and Webcasts.”

Technical assistance is available upon request. Please complete the “Technical Assistance Request Form,” which you can find by visiting [Training](#), and submit it to your Area ONAP.

Program Administration

9. What are the administrative requirements for the Tribal HUD-VASH program?

All statutory and regulatory requirements under the Native American Housing and Self-Determination Act of 1966 (NAHASDA) and the Indian Housing Block Grant (IHBG) program apply unless the requirements conflict with the requirements provided in Section VI of the Tribal HUD-VASH Consolidation Notice. If there is a conflict, the requirements in Section VI of the Tribal HUD-VASH Consolidation Notice prevail. Section VI of the Tribal HUD-VASH [Consolidation Notice](#) provides requirements that apply in addition to or instead of the existing IHBG and NAHASDA requirements (e.g., screening and selection, income verification, background check requirements, record-keeping, reporting, use of program income, etc.). It is important that you are familiar with and rely on Section VI of the Tribal HUD-VASH [Consolidation Notice](#) for the specific modification of administrative requirements that apply in the Tribal HUD-VASH program.

10. Is the Tribe/TDHE required to review the lease agreement between the Native American Veteran and the private landlord?

Yes. You must review the lease agreement between the Native American Veteran and the private landlord to ensure that it complies with Section 207 of the Native American Housing Assistance and Self-Determination Act of 1996. A copy of the executed lease should be maintained in the Native American Veteran’s Tribal HUD-VASH records.

Eligibility

11. Who is an eligible “Veteran” under the Tribal HUD-VASH program?

The U.S. Department of Veterans Affairs (VA) determines initial eligibility for Veterans in the program. Veterans must be eligible for VA health care (among other criteria such as homelessness, income and the need for case management services). It is worth noting that the definition of Veteran was expanded recently to include Veterans with other than honorable discharges. Contact the VA for more information at: (877) 424-3838.¹

12. Can a Tribal HUD-VASH grantee serve more Veterans than their allocation is based on?

Yes. Under the [Tribal HUD-VASH Consolidation Notice](#), a grantee can “... provide assistance to additional Native American Veterans if there are funds remaining from the initial grant, and the VA is able to provide Case Management support at no additional cost.” Please work with

¹ VA can also be contacted locally. Visit their website at <https://www.va.gov/homeless/hud-vash.asp>

your Area ONAP as well as the VA Case Manager to explore the viability of serving more Veterans.

Income Requirements

13. Must a family be income qualified to be eligible for Tribal HUD-VASH assistance?

Yes. The Tribe or TDHE must determine whether a family is income-eligible prior to providing Tribal HUD-VASH assistance. If the family is over-income based on the most recently published income limits for the family size, the family is ineligible for admission to the Tribal HUD-VASH program. After admission, Native American Veterans can continue to participate in the program even if their income increases, in accordance with the grantee's admission and occupancy policies and the Indian Housing Block Grant program regulation at 24 CFR 1000.110.

14. How is income calculated for the Tribal HUD-VASH program?

To be eligible, a Native American Veteran household's annual income must be no more than 80 percent of the median income. The definitions of annual income and median income for the IHBG program that are in 24 CFR 1000.10 apply. Income limits are updated annually and posted to the Office of Native American Programs [Codetalk](#) website. Recipients may follow their existing IHBG policies on calculating income or may establish new policies for the Tribal HUD-VASH program. The income determination is calculated at the time the Native American Veteran enters the program.

15. Is a Native American Veteran's disability income included when calculating household income?

No. Any amounts received by any member of the family as disability compensation under Chapter 11 of Title 38, United States Code, or dependency and indemnity compensation under Chapter 13 of such title, are excluded from income. This relates to amounts received from the U.S. Department of Veterans Affairs by a family for service-related disabilities of a member of the family and survivor benefits. This exclusion applies only to Tribal HUD-VASH and NAHASDA-funded programs (see [Notice PIH 2024-07](#)).

16. Could a Native American Veteran be income-eligible for the Tribal HUD-VASH program but over-income for the Low-Income Housing Tax Credit (LIHTC) program?

Yes, the LIHTC program has more restrictive income requirements. Therefore, a Native American Veteran who is eligible for the Tribal HUD-VASH program may be over-income for a LIHTC unit.

Participants

17. May a Tribe limit their Tribal HUD-VASH program to only members of that Tribe?

Tribes and TDHEs will not be allowed to deny assistance to an otherwise eligible Native

American veteran who has been referred by the case manager on any grounds other than preferences based on tribal membership in accordance with the tribe/TDHE's written admissions and occupancy policies. Where a tribe/TDHE has adopted a tribal preference policy on admissions and occupancy that provides that the tribe/TDHE will assist a tribal member before members of other Indian tribes, the tribe/TDHE may prioritize assistance under this program to tribal members. If a tribe/TDHE has remaining grant funds after serving its tribal member veterans, it must serve other referred Native American veterans that are members of other Indian tribes until all grant funds under this program have been fully spent and may not refuse to provide such assistance.

18. How are Native American Veterans determined to be eligible for the Tribal HUD-VASH program?

Native American Veterans are determined eligible through the following process:

- A. U.S. Department of Veterans Affairs (VA) Screening: Native American Veterans are first screened by the VA to determine if:
 - i. the Native American Veteran is eligible for VA health care,
 - ii. the Native American Veteran is homeless or at risk of homelessness,
 - iii. the Native American Veteran has a need for case management services; and,
 - iv. the Native American Veteran agrees to participate in VA case management.
- B. Tribe/TDHE Screening: Native American Veterans found to be eligible by VA are then referred to and screened by the Tribe/TDHE to determine if:
 - i. the Native American Veteran is an Indian as defined by NAHASDA,
 - ii. the Native American Veteran is income eligible for the Program, and
 - iii. the Native American Veteran is not registered as a lifetime sex offender.

If you are a Native American Veteran who would like to apply for the Tribal HUD-VASH program, contact the VA at (877) 424-3838.

19. What restrictions on sex offenders apply to the Tribal HUD-VASH program?

Any Native American Veteran or any member of a household that is subject to the lifetime registration requirement (Tier III offense) under any State sex offender registration program is not eligible for the Tribal HUD-VASH program.

20. What happens if a household member of the Veteran is subject to a lifetime registration requirement under a state sex offender registration program?

From Section (VI)(B)(4)(c) of the [Consolidation Notice](#): "HUD is applying the screening requirements similar to 24 CFR 982.553(a)(2) relating to registered lifetime sex offenders. Tribes/TDHEs are required to establish written standards that prohibit admission if the veteran or any member of the household is subject to a lifetime registration requirement (Tier III offense) under any state sex offender registration program. As part of the eligibility screening process, a tribe/ TDHE must perform a background check to see if the referred veteran or any household member is subject to a lifetime sex offender registration requirement in the state where the housing is located and in other states where the household members are known to have resided.

If a household member other than the Homeless or At Risk of Homelessness veteran (which would result in denial of admission for the household) is subject to lifetime registration under a state sex offender registration, the remaining household members may be served if the veteran agrees to remove the sex offender from its household composition. This requirement is necessary to ensure consistent policy across the HUD-VASH programs relating to providing assistance to registered sex-offenders.”

21. Would a debt to the housing department or a status of “not in good standing” from a previous tenancy in housing units be a reason for a Tribe/TDHE to deny assistance through the Tribal HUD-VASH Program?

No. Delinquent back rent or not in good standing with the TDHE are not reasons for denial.

22. If a Tribal HUD-VASH-assisted Native American Veteran passes away, must the remaining family members vacate the unit?

If a Native American Veteran being housed under the Tribal HUD-VASH program passes away, the remaining family members are not eligible to receive rental assistance under the Tribal HUD-VASH program. However, the Tribe or TDHE may continue to house the family in accordance with their occupancy policies and can use IHBG program funds (or other housing funds) to assist the family if they are eligible for the IHBG program.

Case Management

23. Can the Veteran still receive VA case management even if they no longer need rental assistance?

Yes. The Native American Veteran may remain in the program and receive case management services from the U.S. Department of Veterans Affairs even if they are not receiving Tribal HUD-VASH rental assistance.

24. If a Tribal HUD-VASH participant becomes over-income, would they remain eligible to continue case management services through the VA?

Yes. The Native American Veteran may still receive case management services from the U.S. Department of Veterans Affairs even if they no longer need the Tribal HUD-VASH rental assistance.

25. If a Tribal HUD-VASH participant graduates from case management, can they still receive rental assistance?

Yes. Per Section (VI)(E) of the [Consolidation Notice](#), if the assisted Native American Veteran has graduated from case management, the Native American Veteran may still receive rental assistance under the Tribal HUD-VASH program. However, HUD encourages the Tribe or TDHE to use Indian Housing Block Grant or other funds to support the Native American Veteran, so the rental assistance may go to another homeless Native American Veteran in need of case management.

26. Where can a Native American Veteran find information about participation in the Tribal HUD-VASH program?

The Native American Veteran should contact the U.S. Department of Veterans Affairs Homeless Veterans Helpline at (877) 424-3838.

27. Where are VA caseworkers located?

The location of caseworkers is negotiated between the Tribe or TDHE and the U.S. Department of Veterans Affairs (VA). Possible locations may include a VA Medical Center or Community-Based Outreach Clinics (CBOC) or onsite at a Tribal location or TDHE office. Additionally, the VA may contract with the Indian Health Service or directly with the Tribe for the Tribe to provide caseworkers.

28. If a Veteran has PTSD or night terrors and cannot sleep in the same room as their spouse/partner, can they be accommodated with more bedrooms than necessary for family size according to the Consolidation Notice?

Yes, this may be a reasonable accommodation that can be made.

Environmental Review

29. What are environmental requirements under the Tribal HUD-VASH program?

All Tribal HUD-VASH programs undergo an environmental review pursuant to 24 CFR Part 58 or 24 CFR Part 50. Refer to [PIH Notice 2024-24](#) for additional information. Tribes and TDHEs may rely upon PIH Notice 2024-24 to document compliance with environmental requirements for *tenant-based rental assistance* and do not need to complete a HUD Part 58 environmental review. Note this streamlined process only applies to tenant-based rental assistance. If you have project-based units in your Tribal HUD-VASH program, you must complete an additional environmental review (see Section 3.b. of [PIH Notice 2024-24](#) for instructions on the appropriate review for project-based units). Please contact your Area ONAP Grants Management Specialist if you need assistance.

30. What environmental review requirements apply to project-based Tribal HUD-VASH units?

When the Tribe or TDHE attaches rental assistance to a specific unit, this is considered project-based rental assistance. If the project-based rental assistance activities do not include any associated repairs, rehabilitation, new construction, or other activities with physical impacts, then the project requires a “limited scope” of Categorically Excluded Subject to 58.5 (CEST) environmental review.

If project-based rental assistance includes activities such as rehabilitation, new construction, conversion of land use, or demolition, then the project will require either an Environmental

Assessment or a finding and documentation of Categorically Excluded Subject to 58.5 (CEST). Refer to page 2-3 of [PIH Notice 2024-24](#).

Tribes and TDHEs can find format and instructions for any level of review at https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/resources.

31. When using project-based Tribal HUD-VASH funding on an assisted unit, can a previously conducted environmental review be used?

Yes, in certain circumstances. 24 CFR Part 58.35(b)(7) allows for supplemental assistance to be exempt from environmental review. If you previously performed a Categorically Excluded Subject to 58.5 (CEST) or Environmental Assessment review for your project-based rental assistance project (for example, because you purchased, constructed, or rehabbed units for Tribal HUD-VASH), you can use this exemption if:

- The Responsible Entity (RE; this is the Tribe) determines that the project was previously approved under Part 58, and
- The approval will be made by the same RE that approved the previous review, and
- Re-evaluation under 24 CFR Part 58.47 is not required.

If the exemption applies, you should update the environmental review checklist to reflect the additional funding and maintain the record of the exemption in your Tribal HUD-VASH files. Please note that HUD generally advises recipients that environmental reviews “last” five years. Contact your Area ONAP for additional guidance.

Program Implementation

32. Can a Native American Veteran rent a unit owned by another Tribe or TDHE?

Yes, a Native American Veteran can rent a unit owned by a Tribe or TDHE that is not the Tribal HUD-VASH grantee. The lessor would be considered a private owner/landlord. There would be a Rental Assistance Payment Contract in place between the Tribal HUD-VASH recipient providing rental assistance and the unit owner. The Native American Veteran would also have a Lease Agreement with the owner.

Inspections

33. Are housing inspections required for units assisted by the Tribal HUD-VASH program?

Yes. Once a unit is located or ready to be occupied by a Native American Veteran, the Tribe or TDHE must make a determination that the unit meets applicable local housing codes and quality standards in accordance with section 207(a) (2) of NAHASDA. The cost of this inspection can be covered by the Tribal HUD-VASH administrative fee.

Note that Housing Quality Standards (HQS) or National Standards for the Physical Inspection of Real Estate (NSPIRE) are not required, unless they are part of the local housing codes and quality standards.

Types of Tribal HUD-VASH Rental Assistance (PBRA vs. TBRA)

34. Please clarify the difference between tenant-based rental assistance (TBRA) and project-based rental assistance (PBRA).

In a TBRA program, the Veteran generally chooses their unit and if they move, the assistance follows them to the new unit. In a PBRA program, the assistance remains with the unit.

35. Can the PBRA be converted to TBRA and vice versa?

Yes, you can convert from PBRA to TBRA and vice versa. If you convert from TBRA to PBRA, you will need to comply with the project-based rental assistance submission requirements as outlined in the [Consolidation Notice](#). See paragraph V.C.5 and note the submission requirements to HUD prior to the conversion.

36. In a PBRA Program, what are examples of the term “structure?”

This term refers to the type of housing the PBRA is attached to, e.g., Single Family Detached, semi-detached, Rowhouse/Townhouse, Low-rise, High Rise Elevator, Manufactured Home.

37. In a TBRA Program, may a Native American Veteran choose to rent a privately-owned unit?

Yes.

38. Can the Tribe serve Native American Veterans outside of their formula area or Indian area?

The [Consolidation Notice](#) states that Tribes and TDHEs participating in this program must house Native American Veterans either on or near reservations, or within NAHASDA-authorized Indian areas, with the exception of units developed to house Homeless veterans on the grounds of a VA facility. Indian Area is defined under the regulations very broadly to mean “the area within which an Indian Tribe operates affordable housing programs or the area in which a TDHE, as authorized by one or more Indian Tribes, operates affordable housing programs.” This means that a Veteran assisted under the program can live in a unit that is not on a reservation and is located on fee simple land. The U.S. Department of Veterans Affairs must be able to provide case management services.

Rent

39. Could rent for Native American Veterans be less than thirty percent (30%) of the household’s monthly adjusted income?

Eligible Native American Veterans and their families are to make a monthly tenant rent contribution payment that is no more than 30 percent of their monthly adjusted income. If a

Tribe or TDHE decides to charge less than 30 percent, the recipient can use Tribal HUD-VASH funds to cover the remainder, up to 110 percent of the Fair Market Rent (FMR) for the unit. IHBG funds may be used to cover additional costs related to housing Native American Veterans and their families, under this Program (see VI.I of the [Consolidation Notice](#)). IHBG funds can be used for rent, security deposits, utilities, or admin costs for THV. Additionally, IHBG funds could be used for other supportive services (beyond what's provided by THV), and other costs could be contemplated on a case-by-case basis.

*Please note that [Program Guidance 2018-01](#) states that IHBG funds are not allowed to cover rental costs, security deposits, utilities, or administration costs for the Tribal HUD-VASH program. **However, ONAP intends to rescind and/or replace Program Guidance 2018-01.**

40. Can a Tribe/TDHE with ceiling rents that are lower than FMR charge Tribal HUD-VASH rents that are higher than the ceiling rents?

Yes. Tribal HUD-VASH funds can be used to subsidize rents in eligible units up to 110 percent of the Fair Market Rent for the locality. However, the Tribe or TDHE should have a specific rental policy in place that clearly delineates this practice and rationale in relation to the Tribal HUD-VASH program and related ceiling rents for such units. A Tribe or TDHE should consider and balance the benefits of collecting additional rents versus serving additional Native American Veterans. Furthermore, the general practice of having standard ceiling rents set well below fair market amounts should be periodically reviewed to assure that this practice is financially feasible.

41. How is rent structured when Native American Veterans live together in a shared housing arrangement?

In a shared living arrangement, where a Native American Veteran is living with other Veterans or persons not in their household, each household in the unit should have a separate lease with the landlord stipulating each tenant's share. The Native American Veteran's rent contribution would then be calculated based on the rent amount specified in the Veteran's lease. Each Veteran would get separate rental assistance from their Tribe or TDHE's Tribal HUD-VASH program.

42. Under what conditions can a formula current assisted stock (FCAS) unit be used in the Tribal HUD-VASH Program?

If a Tribe or TDHE wishes to use any of its low rent FCAS units for the Tribal HUD-VASH program, they must contact the IHBG Formula Customer Service Center by calling 1-800-410-8808 and temporarily remove the FCAS units from the IHBG funding formula during the time the unit will be receiving Tribal HUD-VASH assistance. Additional guidance is found in [Program Guidance No. 2018-01](#).

43. If a service area covers multiple counties, which [Fair Market Rents](#) (FMR) would apply? Does FMR include utilities?

When a service area covers multiple counties, you may use the county with the highest FMR. FMR, as calculated by HUD, includes the cost of rent and utilities.

44. Can we get an FMR waiver for our entire Tribal HUD-VASH program?

ONAP cannot authorize blanket/program-wide waivers. Waivers must be given on a case-by-case basis given the language in the [Consolidation Notice](#), which refers to an individual Veteran or unit.

45. Can small area FMRs be used to inform approvals of individual FMR waivers?

For purposes of the Tribal HUD-VASH program, you must use the area-wide FMR unless you receive approval from HUD to use a higher amount for a specific unit. You may use the Small Area Fair Market Rents (SAFMR) as part of your justification for the need for the FMR waiver.

HUD published the [SAFMR Final Rule](#), which calculates rental assistance payment standards at the ZIP code level, rather than a metropolitan area-wide FMR. SAFMRs allow for payment standards to be established that more accurately reflect the local market. This can be helpful in providing voucher holders greater access to low-poverty and/or high-opportunity neighborhoods.

Use of Funds

46. Can Tribal HUD-VASH funds be used to address health and safety issues on a home a Native American Veteran wishes to rent?

No. Tribal HUD-VASH funds can only be used to pay rent on behalf of an eligible Native American Veteran. The unit must meet local housing codes and quality standards in accordance with section 207(a)(2) of NAHASDA prior to occupancy.

47. Can Tribal HUD-VASH funds be used to make loan payments for homeowners?

No, funds cannot be used to make loan payments.

48. If a Tribal HUD-VASH-eligible Native American Veteran cannot afford the required security deposit for an apartment, could IHBG funds be used to supplement the Native American Veteran's security deposit?

*Yes, IHBG funds may be used to supplement a security deposit for a Tribal HUD-VASH-eligible Native American Veteran who cannot afford the required security deposit. Additionally, Tribal HUD-VASH funds, SSVF funds, recipient's program income, or alternative funding may be used to supplement the Native American Veteran's security deposit. Using Tribal HUD-VASH funds to supplement the Native American Veteran's security deposit would reduce the assistance available for rent.

*Please note that [Program Guidance 2018-01](#) states that IHBG funds are not allowed to cover rental costs, security deposits, utilities, or administration costs for the Tribal HUD-VASH program. **However, ONAP intends to rescind and/or replace Program Guidance 2018-01.**

49. Can Tribal HUD-VASH rental assistance be used for a unit funded by the USDA Rural Rental Loan Program (Section 515) or the Rural Rental Housing Guaranteed Loan Program (Section 538)?

Yes, Tribal HUD-VASH rental assistance can be used on debt service for the affordable housing unit, including those financed by the USDA.

50. How should admin funds be expensed during a grant period? What type of expenses are eligible for administrative related activities?

Administrative fees are included in each Tribal HUD-VASH grant and are available for eligible administrative and planning activities. Administrative fees are a flat amount based on the number of units in your Tribal HUD-VASH unit allocation. Eligible administrative expenses include but are not limited to:

- A. eligibility determinations
- B. intake and briefings
- C. owner outreach efforts
- D. unit inspections
- E. rent negotiations
- F. annual and interim reexaminations
- G. tenant fraud investigations and hearings
- H. processing subsequent moves
- I. the costs associated with making rental assistance payments to owners
- J. complying with reporting requirements.

Please note that administrative funds should be used within the period of performance reflected on the grant agreement.

Utilities

51. Can a landlord include utilities in the total rent charged for a unit?

Yes, but including utilities in the total rent is not required. Utilities are an eligible use of Tribal HUD-VASH grant funds. However, when charging rent, the inclusion of utilities is at the discretion of the landlord. If a landlord is not going to include utilities, the landlord should explicitly state that in the Lease Agreement. This data will also need to be represented and noted in the HIP reporting tool. Note that if the utilities are not included in the total rent charged, a Tribe or TDHE may set the THV tenant's rent contribution at lower than the 30% of adjusted income limit, and then the THV tenant would put that reduction toward the utility payments.

*Please note that [Program Guidance 2018-01](#) states that IHBG funds are not allowed to cover rental costs, security deposits, utilities, or administration costs for the Tribal HUD-VASH program. **However, ONAP intends to rescind and/or replace Program Guidance 2018-01.**

Reporting

52. Do the Tribal HUD-VASH program grant funds get reported annually in the Tribe/TDHE's IHP/APR?

Yes, Tribal HUD-VASH program grant funds must be reported annually in the Indian Housing Plan, Annual Performance Report, and on the Federal Financial Report (SF-425), which is done in the Grants Evaluation and Management System, [GEMS](#). Grantees must also report their tenant data, as noted in the [Consolidation Notice](#) and [Program Guidance 2016-05](#). The current form is the [HUD-50925](#) available on [HUDClips](#), or grantees may use the electronic reporting tool provided by [the Housing Information Portal \(HIP\) system](#). HUD encourages but does not yet require the use of the HIP system.

53. If a grantee owns and operates a housing unit and rents to a Tribal HUD-VASH recipient, what program income and SF-425 reporting considerations apply?

Section VI.K of the Consolidation Notice states that “Amounts paid to the tribe/TDHE to cover the rental assistance payment of Native American veterans and their families in tribe/TDHE-owned or operated housing; tenant rent contribution payments collected under this program; and any other income earned from the disbursement of grant funds, including income earned on funds received from such payments; will be considered program income, and must be spent on affordable housing activities, which will be subject to the requirements of NAHASDA . . . such income may not be spent on housing-related activities, as that term is defined in [24 CFR 1000.10](#).”

To further explain:

- Amounts paid to the tribe/TDHE to cover the rental assistance payment of Native American veterans and their families in tribe/TDHE-owned or operated housing is considered program income. **This refers to the Tribal HUD-VASH grant funds themselves.** Once deposited into the grantee’s account, the THV funds must be reported on line 10I-o of the SF-425.
- Regardless of the source of the program income, THV program income may only be used for affordable housing activities (not “housing-related” as permitted under the Indian Housing Block Grant program) that are then subject to the requirements of NAHASDA.
- HUD encourages grantees to use program income to assist eligible Native American Veterans first, before providing assistance to other low-income Native American families.

Closeouts

54. What are the next steps if all the grant funds are expended?

ONAP will close the Tribal HUD-VASH grant when it determines that Tribal HUD-VASH grants have been fully expended or the grant is at the end of the approved Period of Performance (POP), whichever occurs first. A grantee must liquidate all financial obligations incurred under the ONAP grant award **prior to the end date of the period of performance** as specified in the grant agreement. If funds remain after the POP expires, the funds will be de-obligated and returned to HUD to be utilized for future renewal awards within the Tribal HUD-VASH program.

55. How do I close out a grant?

Please referred to the [Notice PIH 2023-02](#) for Closeout Instructions for the THV Grant Program.

56. What does De-Obligation of Grant Funds mean and what is the process?

Please referred to the [Notice PIH 2023-02](#) for Closeout Instructions for the THV Grant Program.

57. What do I do if I need to amend my Period of Performance (POP) End Dates?

Grantees should do their best to draw down the grant funds before the POP end date.

If a grantee needs more time to draw down funds, HUD may grant an extension to the POP if justified and allowable. See [Notice PIH 2023-02](#).

Supportive Services for Veterans and Families (SSVF)

58. Is a Native American Veteran eligible to receive Supportive Services for Veterans and Families (SSVF) services?

Yes, if they meet the SSVF eligibility criteria for the specific assistance being requested. As background, SSVF is a grant-based program where non-profit organizations and consumer cooperatives are awarded a SSVF grant. The focus of the grant program is to assist very low-income Veteran families with prevention and rapid-rehousing services. These services include outreach, housing case management, connection to VA resources, and connection to mainstream resources. Temporary Financial Assistance (TFA) for things like security deposits and moving costs might also be available; these determinations are made on a case-by-case basis depending on need. The goal of all services is to promote housing stability. Native American Veterans in HUD-VASH receive case management from the HUD-VASH Case Manager, not the SSVF Case Manager. More information about SSVF can be found at: <https://www.va.gov/homeless/ssvf/>.

Appendix A – Sample Tribal Resolution Language

**U.S. Department of Housing and Urban Development
Office of Native American Programs
Tribal HUD-VASH Renewals**

Sample Tribal Resolution Language

Delegation of Authority to Submit an Application on Behalf of a Tribe: *This language is offered as an example of Tribal Resolution language that includes the details essential to convey Tribal authorization; this text is not required verbatim.*

Authorization for [INSERT THE NAME OF TRIBAL ORGANIZATION APPLYING] to submit a renewal application for the 20XX Tribal HUD-Veterans Affairs Supportive Housing Program (VASH) to the U.S Department of Housing and Urban Development’s Office of Native American Programs for the purpose of [INSERT BRIEF DESCRIPTION OF PROJECT].

WHEREAS, [INSERT TRIBAL ORG] qualifies as an eligible recipient to apply for a Tribal HUD-VASH grant and administer the grant funding on behalf of [INSERT NAME OF TRIBE] and,

WHEREAS, [INSERT TRIBAL ORG] is authorized to apply for Tribal HUD-VASH Renewal grant for a total amount of [INSERT REQUESTED FUNDING AMOUNT] and,

WHEREAS, if awarded, [INSERT TRIBAL ORG] will be responsible for compliantly administering the Tribal HUD-VASH program for the purpose of [INSERT BRIEF DESCRIPTION OF PROJECT].

NOW, THEREFORE, BE IT RESOLVED that [INSERT NAME OF TRIBE] hereby grants [INSERT THE NAME OF TRIBAL ORG] the sole authority to apply for the Tribal HUD-VASH Renewal grant on behalf of [INSERT NAME OF TRIBE].

Appendix B – Sample Cover Letter

SAMPLE COVER LETTER (*one-page limit*)
FY 20XX Tribal HUD-VASH Grant Application

Date

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Tribal HUD-Veterans Affairs Supportive Housing (Tribal HUD-VASH)
tribalHUDVASH@hud.gov

Re: Tribal HUD-VASH Grant Application

Dear Sir or Madam,

Attached please find the (*insert name of TDHE/Department/Tribe*) Tribal HUD-VASH grant application. The point of contact for this project will be:

Contact Name:

Mailing Address:

Telephone Number:

Email Address:

Tribal Resolution: The Tribal Resolution authorizing the (*insert name of TDHE/ Department/ Tribe*) Tribal HUD-VASH program *is/is not (please select applicable response)* applicable.

Please Note: If the original tribal resolution is no longer applicable then the recipient must attach an updated resolution to the application and note in the cover letter that it is attached.

We have attached the following documentation in support of our Tribal HUD-VASH renewal application:

- Program Update and Overview
- Completed Leasing Performance Report for the period of XXX, 20XX through XXX, 20XX
- **Federal Financial Report / Standard Form-425 (MUST BE ATTACHED EVEN IF PREVIOUSLY SUBMITTED)**

Please note that (*insert name of TDHE/Department/Tribe*) Indian Housing Plan (IHP) and Annual Performance Report (APR) have been updated annually and includes information for the Tribal HUD-VASH program.

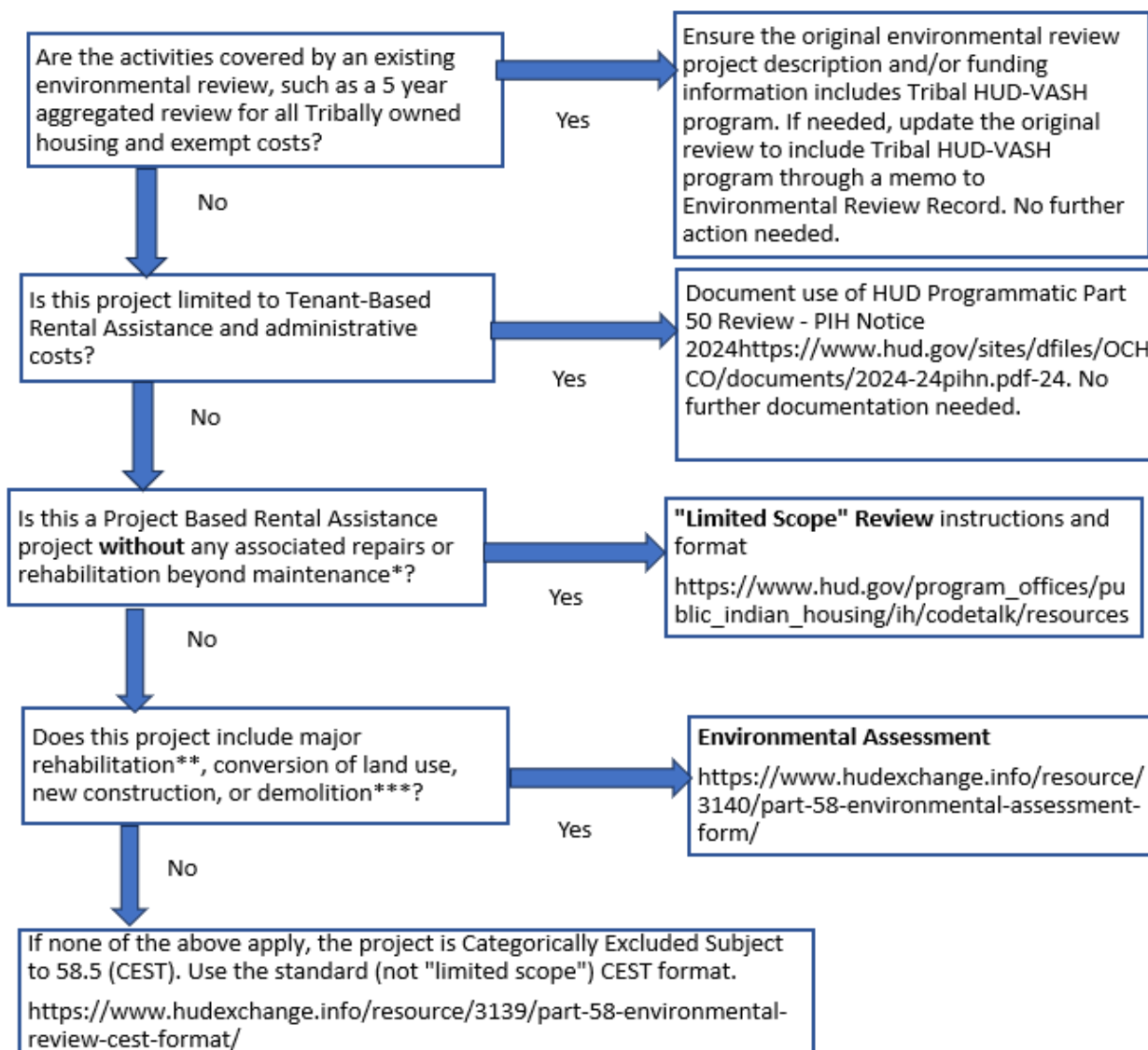
If you have any questions regarding the Tribal HUD-VASH grant application, please contact our office as indicated above.

Sincerely,

Authorized Signature (must be signed by the person authorized to submit the renewal package on behalf of the TDHE/Department/Tribe)

Appendix C – Environmental Review

What level of review and which format should be used to complete environmental reviews for Tribal HUD-VASH program projects?



* Routine maintenance for purposes of environmental review is defined in <https://www.hudexchange.info/resources/documents/Guidance-Categorizing-Activity-as-MaintenanceEnvironmental-Regulations-24-CFR-Parts-50-and-58.pdf>

** For purposes of determining level of review, “major rehabilitation” is rehabilitation that does not conform to the limitations listed in 24 CFR 58.35(a)(3).

*** Select “yes” if new construction or demolition falls outside the definition of an “individual action” in 24 CFR 58.35(a)(4). If proposed construction or demolition conforms to the requirements in that section, select “no.”