ICDBG - ARP

Indian Community Development Block Grant- Imminent Threat Funding
American Rescue Plan Act of 2021

IMPLEMENTATION TRAINING

For ONAP Grantees

August 18, 2021

Revised

Office of
Native American
Programs

Office of Public & Indian Housing

Office of Native American Programs (ONAP)

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TRAINING COMPONENTS

This ICDBG-ARP Implementation Training follows the ICDBG-ARP Implementation Notice, PIH Notice 2021-22.

- ❏ ARP Act Purpose and Background
- ❏ Three Phase of Awards
- ❏ Eligible Applicants
- ❏ Funding Criteria and Requirements
- ❏ Content of Application
- ❏ Application Submission and Review
- ❏ Application Approval
- ❏ Eligible Purposes

- ❏ Eligible Activities
- ❏ Ineligible Activities
- ❏ Waivers and Alternative Requirements
- ❏ Reimbursement of Costs
- ❏ Reporting Requirements
- ❏ General Resources
- ❏ Application Submission Reminders

ICDBG-ARP Purpose and Background

American Rescue Plan Act (Public Law 117-2) (ARP):

- Provides $280,000,000 in ICDBG Imminent Threat funding

- Must be used to **prevent**, **prepare for**, and **respond to** COVID-19

- Encourages expedited expenditure of ICDBG-ARP grant funds

- Waives or provides alternative to some statutory/regulatory requirements.

- These waivers and alternative requirements apply ONLY to ICDBG funding provided under the ARP, not *Regular ICDBG funds*

Three Phases of Applications

HUD is providing funding priority to applicants that submitted an eligible application under the ICDBG-CARES program **but did not receive a grant** because of limited appropriations.

The ICDBG-ARP grants will be awarded in three phases:

* **Phase One:** Unfunded ICDBG-CARES Applicants, including partially funded

* **Phase Two:** Other ICDBG-ARP Applicants

    * First Tier – Applicants that **did not** receive ICDBG-CARES award

    * Second Tier – Applicants that did receive a **fully** funded ICDBG-CARES award

    Applicants may only apply to EITHER Phase One or Phase Two, not both.

* **Phase Three:** If Funding Remains

3. Eligible Applicants

- **Indian tribes and Tribal organizations -** <u>same criteria for eligible applicants</u> provided in the ICDBG regulations at 24 CFR 1003.5

  - *Any Indian tribe, band, group, or nation, including Alaska Indians, Aleuts, and Eskimos, and any Alaska native village* of the United States which is considered an eligible recipient under Title I of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5301, et seq.).

  - *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 when one or more of these entities have authorized the Tribal organization to do so through concurring resolutions.

3. Eligible Applicants (Continued)

Tribal Resolutions- Any Tribal organization applying for an ICDBG-ARP may request a waiver of this requirement in the application.

The Waiver Request must include:

- Description of other assurances of agreement from the beneficiary Tribe

- Justification for the waiver request

- When the applicant expects to secure the Tribal Resolution.

The Tribal Resolution must be received by HUD before funding is awarded.

4. Funding Criteria and Requirements

HUD streamlined the application process while also ensuring that ICDBG-ARP grant funds will be used to prevent, prepare for, and respond to COVID-19.

a. Citizen Participation:

Public meetings are <u>not required before applying</u> for ICDBG-ARP grant funding; *However,* applicants will be required to publish or post information on applicant plans to ICDBG-ARP funds and accept and consider comments received.

b. Eligible Purposes:

HUD will only fund ICDBG-ARP applications that propose to carry out projects and activities that meet one or more of these eligible purposes to prevent, prepare for, and respond to coronavirus, for emergencies that constitute imminent threats to health and safety.

4. Funding Criteria and Requirements (Continued)

c. Urgency and Immediacy of Threat:

The urgency and immediacy of the threat need not be independently verified before approval of an application. The urgency and immediacy of the threat will be presumed by HUD, unless HUD has evidence to the contrary.

d. Nonrecurring Threats and Impact on Service Area:

Applications need not demonstrate that COVID-19 is a non-recurring imminent threat and that it has an impact on an entire service area. HUD will presume these criteria are met unless HUD has evidence to the contrary.

e. Available Resources:

Applicants do not have to demonstrate that other tribal funding sources cannot be made available to alleviate the threat.

4. Funding Criteria and Requirements (Continued)

f. Coordination and Duplication of Benefits:

> Coordinate locally and with other federal agencies to ensure that federal funds are used appropriately and is not provided for the same costs paid by any other source, or private insurance.

g. Administration and Planning:

> ICDBG-ARP grantees may not expend more than 20% of their grant amount, plus program income toward administration and planning costs.

h. Program Income:

- Any program income derived from the use of ICDBG-ARP must be spent on eligible ICDBG-ARP program activities.
- HUD will provide instructions to the ICDBG-ARP grantee on the disposition of such program income at the time the closeout agreement is signed. (24 CFR 1003.508)

4. Funding Criteria and Requirements (Continued)

i. Grant Ceilings

ICDBG-ARP grant ceilings are based on IHBG-ARP Funding Allocations:

IHBG-ARP Award Amount	Grant Ceiling
More than $4.5 million	**$3.45 million**
More than $1.625 but less than $4.5 million	**$1.725 million**
Less than $1.625 million	**$1,035,000**

Partially Funded Phase One Applicants' funding requests are limited to the ICDBG-ARP grant ceilings amount **LESS the amount funded with ICDBG-CARES.**

4. Funding Criteria and Requirements (Continued)

i. Grant Ceilings (continued):

The grant ceilings were based on the amount of funds each Indian tribe or TDHE received under the IHBG-ARP program (IHBG-ARP Formula Allocations)and also informed by the results of Tribal Consultation.

The Grant Ceilings allow HUD to:

- Maintain parity with the standard Imminent Threat Grants
- Increase grant ceilings previously set under ICDBG-CARES to account for increases in construction costs.
- Augment the IHBG-ARP funding to address COVID-19 needs, particularly for smaller grantees.
- Increase grant ceilings set under ICDBG-CARES to address increased construction costs.
- Accommodate the largest Tribes' scale of need.

Phase One Applicants may amend the budget of their unfunded
ICDBG-CARES project with the ICDBG-ARP grant Ceilings.

4. Funding Criteria and Requirements (Continued)

j. Lead Based Paint Requirements: Are required and not waived.

k. Environmental Requirements: Are required and not waived.

- Activities under this NOFA are subject to the environmental review provisions set out at 24 CFR 1003.605, 24 CFR 1003.401, and 24 CFR Part 58. Refer to HUD's Environmental Review Website.

- See CPD Notice: CPD-20-07 for guidance on conducting environmental reviews pursuant to 24 CFR Part 58 and HUD's environmental review website.

4. Funding Criteria and Requirements (Continued)

Pursuant to 24 CFR § 1003.200, ICDBG-ARP grants do not have to comply with the primary objective of the Housing and Community Development Act of 1974, as amended (42 U.S.C. 5103 et seq.) (HCDA), which states that

no less than 70 percent of expenditures of each grant be for activities

which meet the criteria set forth in 24 CFR § 1003.208(a)-(d).

QUESTIONS?

Type a questions into the chat or queue for a spoken question.

5. Content of Application

The application **must** include the following to be considered complete and maintain its place in the application submission que:

- **Standard Form-424** – Application for Federal Assistance
  Select "Application for Federal Assistance (SF-424)" from the list of forms. Click on "Enable All Features" if prompted to do so. This may be necessary for the form to appear.

- **HUD-2880** - Application/Disclosure/Update Report

- **HUD-4123** - Cost Summary

5. Content of Application (Continued)

- **<u>Project Description Summary</u>** must include:

  - A <u>written description</u> of the activities, projects, or programs that the applicant plans to undertake, and how the activities, projects, or programs are tied to preventing, preparing for, and/or responding to COVID-19.

  - A <u>written statement</u> describing how the funded activities will be carried out successfully, timely and within the proposed timeline, and in compliance with program requirements.

  - A <u>narrative description</u> of the implementation timeline reflected in the <u>HUD-4125</u> - Implementation Schedule.

5. Content of Application (Continued)

Notes on the <u>Narrative Description of the Implementation Schedule</u>:

- Timelines must be feasible and appropriate to Prevent, Prepare for, or Respond to COVID-19.

- If HUD questions a proposed timeline, HUD will contact the applicant to ensure that a revised feasible Implementation Schedule is set.

- If the revised implementation schedule is not received timely, HUD reserves the right to reject the application or only partially fund the project.

5. Content of Application (Continued)

Notes on the <u>Narrative Description of the Implementation Schedule</u>:

- Applications with Implementation Schedules **longer than 12 months** must provide justification supporting why the proposed timeline is reasonably set to prevent, prepare for, or respond to COVID-19.

- HUD will consider justification factors including, but not limited to:

  - The nature of the activities, projects, or programs being proposed,

  - The size of the ICDBG-ARP grant requested,

  - Disruption in supply chains, barriers caused by a short or disrupted construction season,

  - Infrastructure challenges,

  - Impact of COVID-19 on the applicant's operations and its ability to carry out activities, projects, or programs more expeditiously.

5. Content of Application (Continued)

Notes on the <u>Narrative Description of the Implementation Schedule</u>:

- <u>New Housing Construction Projects</u>: Must clearly describe how the project is designed to prevent, prepare for, and respond to COVID-19 (e.g. to reduce overcrowding), and that the applicant plans to carry out expeditiously.

- <u>Economic Development Projects</u>: Due to other available resources, HUD will consider funding economic development projects only after other activities are fully funded first, and if ICDBG-ARP funding remains available.

    HUD reserves the right to prioritize non-economic development projects after assessing program demand and other available resources.

5. Content of Application (Continued)

- **HUD-4125- Implementation Schedule:** HUD may approve an applicant's request to revise the Implementation Schedule at a later date, with justification.

- **Detailed Budget Information:** This narrative must include any pre-award costs incurred that the applicant seeks reimbursement for and documentation supporting those reimbursable costs.

- **Waiver Request** (Tribal Organizations Only): If unable to get a tribal resolution before applying, the applicant must include a request to HUD to waive the tribal resolution requirement in 24 CFR 1003.5(b) with a justification.

6. Application Submission and Review

ICDBG-ARP Application Schedule			
Phase One: Unfunded ICDBG-CARES Applicants	**August 4, 2021**	**Priority List Appeal Deadline**	Grantees excluded from Priority List may appeal.
	August 4, 2021	**Phase One Open Date**	ONAP will contact Grantees on Phase One Priority List.
Phase Two: Other ICDBG-ARP Applicants	**September 3, 2021**	**Phase Two Open Date**	Phase Two Application period opens.
	October 18, 2021	**Phase Two Close Date**	Phase Two Application period closes.
Phase Three: Remaining ICDBG-ARP Funds	**October 18, 2021**	**Phase Three Start Date**	If funds remain, HUD will review applications received after Phase Two close date.
	No Close Date. HUD will fund eligible projects until ICDBG-ARP funding is exhausted.		

Phase One Applicants:

Based on feedback from Tribal Consultation and the status of the ongoing Covid-19 pandemic, HUD granted initial funding priority to the Unfunded ICDBG-CARES Applicants whose eligible applications were not funded due to funding limitations.

Refer to the Phase One Priority Applicant List on Codetalk or to Attachment B of PIH Notice 2021-22, ICDBG-ARP Implementation Notice.

ONLY Grantees listed on the Phase One Priority List may apply for Phase One.

Phase Two Applicants:

Applicants that do not qualify under Phase One may apply for ICDBG-ARP funding under Phase Two.

HUD will award Phase Two applications <u>first by tier</u>, then by date and time received.

Phase Two applications will be sorted into two tiers:

- **First Tier-** Applications <u>not funded</u> under the ICDBG-CARES program.

- **Second Tier-** Applications <u>fully funded</u> under the ICDBG-CARES program.

Applicants may only apply to EITHER Phase One or Phase Two, not Both.

6. Application Submission and Review

Phase Two Submissions:

The Application Period for **Phase Two Starts on September 3, 2021** at 3pm EDT.

Applications submitted before then <u>will not be considered</u> and will have to be resubmitted on or after September 3, 2021 at 3pm EDT**.**

The Application Period for **Phase Two Closes on October 18, 2021** at 6pm EDT.

Applications submitted after October 18, 2021 at 6pm EDT <u>will not be considered</u> in Phase Two.

Applications must be sent to the ICDBGARP@hud.gov email address.

- This is the only method applications can be received since HUD is on maximum telework.
- Do not send applications through www.grants.gov
- Applicants should maintain original applications in their files

6. Application Submission and Review (continued)

Phase Two Application Review:

HUD will consider and award Phase Two applications <u>first by tier</u>, then <u>by date and time received</u>.

- **First Tier –** Applications from grantees that were not funded with ICDBG-CARES are prioritized.

- **Second Tier –** Applications from grantees what were funded with ICDBG-CARES will be funded after all eligible First Tier applications have been awarded.

    Applications from both Tiers will be reviewed by HUD concurrently on a

    first-come, first-served basis.

Intermission – 10-minute break

Phase Two Application Review: continued.

Incomplete Applications:

An application will be **Rejected** and will **lose its position** if:

- The Application is **Incomplete,** meaning it does not include all the required documents in the application package.

- The Application is determined to have a **Material Deficiency.** This means the documentation is deficient enough to be considered incomplete.

If an application is rejected, HUD will issue an Incomplete Application letter notifying the applicant that the application has been rejected and specifying the reason(s) why it was considered incomplete or materially deficient.

Once the application is revised to address the material deficiency or missing requirement, the application can be resubmitted to ICDBGARP@hud.gov and will be ranked based on the date and time of receipt.

6. Application Submission and Review (continued)

Phase Two Application Review (continued):

Additional Information Needed on Complete Applications:

- ONAP will review the complete applications and determine if the application is fundable based on the terms and requirements in PIH Notice 2021-22.

- If additional information is required to make this determination, ONAP will send the applicant an Additional Information Needed letter specifying what is required and provide a due date for the applicant's response.

- If the applicant fails to respond by the specified due date, the application will be considered incomplete and will not be funded.

- If the needed information is received timely, the application will continue on in the review process.

ONAP reserves the right to fund only certain activities, projects, or programs proposed in an application.

6. Application Submission and Review (continued)

Phase Three Applications:

If ICDBG-ARP funding remains after awarding Phase One and Phase Two, HUD will continue to review and award applications in Phase Three on a first-come, first-served basis.

- Applications received after the Phase Two Application Period Close Date on October 18, 2021 at 6pm EDT will be considered in Phase Three.

- HUD may set-aside funds or prioritize Phase Three funding for those not been awarded ICDBG-CARES or ICDBG-ARP grants.

DO NOT wait to apply in Phase Three; there is no guarantee there will be funding remaining.

All applicants should apply in **either** Phase One **or** Phase Two.

Phase Three Application Review: continued.

Incomplete Applications:

An application will be **Rejected** and will **lose its position** if:

- The Application is **Incomplete,** meaning it does not include all the required documents in the application package.

- The Application is determined to have a **Material Deficiency.** This means the documentation is deficient enough to be considered incomplete.

If an application is rejected, HUD will issue an Incomplete Application letter notifying the applicant that the application has been rejected and specifying the reason(s) why it was considered incomplete or materially deficient.

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Phase Three Application Review (continued):

Additional Information Needed on Complete Applications:

- ONAP will review the complete applications and determine if the application is fundable based on the terms and requirements in PIH Notice 2021-22.

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- If the applicant fails to respond by the specified due date, the application will be considered <u>incomplete</u> and will not be funded.

- If the needed information is received timely, the application will continue on in the review process.

ONAP reserves the right to fund only certain activities, projects, or programs proposed in an application.

7. Approved Applications

Approved Applications:

For all approved applications, HUD will send by email:
- Grant Approval Letter
- ICDBG Funding Approval/Agreement, Form HUD-52734.

Grantees can sign the grant agreement electronically or print, sign, scan, and email back.

Funds will be available to draw in LOCCS once the signed grant agreements are returned to HUD and processed.

7. Approved Applications continued

Reallocation of Funds:

- HUD will continue to assess the status of the pandemic and reserves the right to adjust how ICDBG-ARP funding is awarded to ensure the needs of Tribes are met and all funding is awarded.

- HUD may make IHBG-ARP or ICDBG-ARP funding from any Phase, that is not accepted, voluntarily returned, or recaptured for any reason, available for additional ICDBG-ARP awards.

QUESTIONS?

Type a questions into the chat or queue for a spoken question.

8. Eligible Purposes

All proposed activities must be tied to one of the following three eligible purposes:

- Activities, Projects, or Programs to **Prevent** COVID-19
- Activities, Projects, or Programs to **Prepare for** COVID-19
- Activities, Projects, or Programs to **Respond to** COVID-19

Expeditious Expenditure
- Projects may be short to-long term but Grantees are encouraged to consider short or medium-term activities or projects to best meet urgent needs and expend funds expeditiously.

- HUD reserves the right to reject activities, projects, or programs with overly lengthy implementation timelines cannot be justified as reasonable to prevent, prepare for, or respond to COVID-19.

9. Eligible Activities

Examples of activities, projects, or programs that could be funded, provided they meet one or more of the above eligible CARES Act purposes, include, *but are not limited to,* the following:

Housing Activities

- Rehabilitation or improvements to housing to used for temporary housing and quarantine/shelter-in-place, or to improve ventilation to reduce the risks of COVID-19.

- New Construction of housing, including tiny homes, if done expeditiously and carried out to reduce overcrowding or to otherwise prevent, prepare for, and respond to COVID-19.

- Acquisition of modular homes or RVs for housing of medical workers, and other essential service providers and emergency front-line staff.

- Must comply with Section 504 of the Rehabilitation Act of 1973 regarding physical accessibility.

9. Eligible Activities (Continued)

Public Facilities and Infrastructure

Applicants may acquire, construct, rehabilitate, or install public works, facilities, and site or other improvements, when carried out expeditiously to prevent, prepare for, and respond to COVID-19. Examples include:

- Construction of permanent or temporary facilities for testing, diagnosis, or treatment of COVID-19.

- Rehabilitation of facilities to establish an infectious disease treatment clinic.

- Acquisition, rehabilitation, or construction of a group living facility that may be used to centralize patients undergoing treatment.

- Retrofitting of a food bank to ensure that employees and volunteers can safely work in the facility and distribute food.

- Paying for the operation and maintenance expenses of existing shelters and other public facilities (not including staffing costs) designed to ensure homeless persons are provided safe shelter and to minimize the risk of community spread.

9. Eligible Activities (Continued)

Public Facilities and Infrastructure (continued)

- Acquisition or conversion of a motel or hotel or similar facility to expand to accommodate isolation of patients during recovery.

- Expanding or repairing water lines to ensure families have access to water to adhere to CDC guidelines and prevent the spread of COVID-19.

- Purchase of water tank trucks and other water distribution equipment, supplies, and facilities to support families without access to water.

- Purchase of emergency ambulances and related specialized equipment and tools to expand medical and other emergency services.

- Expanding cell towers and broadband infrastructure capacity to assist communities lacking internet and phone service to conduct business, allow students to participate in distance learning, support telehealth strategies, and provide other community services, provided such activities can be carried out expeditiously.

9. Eligible Activities (Continued)

Public Facilities and Infrastructure

Vaccination-Related Activities, including:

- Expansion or modification of storage space for proper vaccine storage;

- Covering labor costs for administering vaccinations for ICDBG-eligible families at facilities;

- Establishing and, under certain circumstances, paying the operating costs of temporary vaccination facilities, provided such costs are not being paid for by other sources.

HUD encourages all grantees prevent the duplication of benefits by coordinating with Tribal Departments, Federal agencies and other entities to ensure ICDBG-ARP funds are only used to pay costs not being paid for by others.

9. Eligible Activities (Continued)

Public Services

Applicants may provide new or quantifiably increased public services. ICDBG-ARP funds are not subject to the 15% cap on public services that normally applies to ICDBG grant funds. Examples include:

- Up to 6 months of emergency payments in the form of rental assistance, utility assistance (including internet access to allow children to engage in distance learning), food assistance, clothing, medical, and other emergency assistance.

- Placement of homeless persons in hotel/motels, and other non-congregate sheltering, to minimize infection.

- Job training to expand the pool of health care workers and technicians that are available to treat disease within a community.

- Providing security to ensure the health and safety of community members and to secure construction sites and community facilities from theft or vandalism.

9.Eligible Activities (Continued)

Public Services (continued)

- Testing, diagnosis or other services at a fixed or mobile location.

- Increasing the capacity and availability of targeted health services for infectious disease response within existing health facilities.

- Equipment, supplies, and materials necessary to carry-out a public service.

- Purchasing groceries for a food bank or distribution to vulnerable

- Delivering meals to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.

- Acquisition or leasing of telehealth equipment or services to allow assisted residents access to health care providers from home.

- **Vaccination-Related Public Services**, including public health educational campaigns to inform Tribal communities about the benefits of getting vaccinated and how to get vaccinated.

9. Eligible Activities (Continued)

Economic Development -

- Provide grants or loans to support entrepreneurs or existing businesses to acquire, convert, construct, or reconstruct commercial spaces to revitalize communities and local economies affected by business or job losses resulting from the coronavirus.

- Avoid or reverse job loss (positions or hours worked) caused by business closures related to community mitigation measures (e.g., social distancing, closures, stay-at-home orders) or other job loss and economic disruption resulting from coronavirus by providing working capital assistance to small businesses or entrepreneurs to enable creation and retention of jobs held by low- and moderate-income persons.

- Provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises to revitalize communities and local economies affected by coronavirus or to prepare for and prevent future outbreaks.

9. Eligible Activities (Continued)

Ineligible Activities:

- Activities, projects, or programs that are not reasonably tied to preparing for, preventing, and responding to COVID-19 are ineligible under the ICDBG-ARP program.

- Unless waived or modified by HUD, ineligible activities described in 24 CFR 1003.207 continue to be ineligible (e.g., buildings or portions thereof used for the general conduct of government, political activities, general government expenses).

- ICDBG-ARP grant funds cannot be used to replace or reimburse ICDBG grant funds that were reprogrammed and used to prevent, prepare for, and respond to COVID-19, and then used for other activities typically eligible under the ICDBG program.

QUESTIONS?

Type a questions into the chat or queue for a spoken question.

10. Waivers and Alternative Requirements

Waiver Authority: ARP provides authority to waive certain provisions of Section 106(a)(1) Housing Community Development Act of 1974 or regulations applicable to ARP.

HUD has applied the following waivers and alternative requirements to expedite the use of ICDBG-ARP funds.

Citizen Participation –

- Applicants are not required to hold meetings to obtain the views of residents or to certify that the applicant has met the requirements of 24 CFR § 1003.604(a) Citizen Participation before applying for ICDBG-ARP grant funding.

- Applicants are required, however, to meet the citizen participation requirements by publishing or posting information on their plans to use ICDBG-ARP grants, and accepting and considering comments, to the extent this can be done without risks to health and safety.

10. Waivers and Alternative Requirements (continued)

Application Process for ICDBG-ARP Grants and Funding Criteria –

- Criteria for Funding: Applicants are not required to demonstrate the urgency and immediacy of COVID-19.

- Grant Ceilings: HUD is waiving the ICDBG-IT grant ceilings and establish new grant ceilings for ICDBG-ARP.

- Reimbursement of Costs and Letters to Proceed- HUD is waiving the requirement to verify no other funds are available to address the threat and the requirement of a Letter to Proceed before reimbursement of eligible costs incurred prior to funding.

   Note that only costs incurred after January 21, 2020 may be reimbursed using ICDBG-ARP.

- Availability of Funds: HUD is waiving 24 CFR 1003.402 meaning any unused funds reserved for ICDBG-ARP will remain available in the ICDBG-ARP program and will be not be added to the subsequent year's allocation.

10. Waivers and Alternative Requirements (continued)

- **Rental Assistance, Utility Assistance, Food, Clothing, and Other Emergency Assistance-**

  ICDBG-ARP grant funds may be used to provide emergency payments for low- and moderate-income individuals or families impacted by COVID-19 for items such as food, medicine, clothing, and other necessities, as well as rental assistance and utility payment assistance, for a period not to exceed 6 months, unless further expanded by HUD.

- **Purchase of Equipment-**

  ICDBG-ARP funds may be used to purchase equipment necessary to prevent, prepare for, or respond to COVID-19. Equipment must be used for eligible purposes, and any proceeds from the disposition of equipment will be considered ICDBG-ARP program income.

- **Operating Expenses for Public Facilities-**

  ICDBG-ARP funds may be used to pay for such operating and maintenance expenses (but not salaries) of any public facility, to the extent it is used for COVID-19-related purposes.

10. Waivers and Alternative Requirements (continued)

- **New Housing Construction:**

  ICDBG-ARP funds may be used for new housing construction when such the new construction is carried out to reduce overcrowding, or to otherwise prevent, prepare for, or respond to COVID-19.

  ICDBG-ARP funds may be used to purchase equipment necessary to prevent, prepare for, or respond to COVID-19. Equipment must be used for eligible purposes, and any proceeds from the disposition of equipment will be considered ICDBG-ARP program income.

  Duplication of Benefits: ICDBG-ARP grantees must ensure that ICDBG-ARP funds are used to supplement other Federal sources of funding for public health and safety purposes and should not be used to supplant or replace such funding.

11. Reimbursement of Costs

- ICDBG-ARP may be used to cover or reimburse any allowable costs paid with **non-federal funds** by the applicant to prevent, prepare for, or respond to COVID-19.

- The documentation of reimbursed costs must include the date on which it began preparing for COVID-19 and must provide and maintain documentation supporting all of its reimbursable costs.

- HUD will not accept costs for projects that pre-date January 22, 2020.

- HUD reserves the right to request additional documentation from an applicant to support the reimbursement of allowable costs incurred.

12. Reporting Requirements

The following reporting requirements apply to the ICDBG-ARP grants.

1. **Quarterly Federal Financial Reports (SF-425):** These reports account for the receipt and disbursement of ICDBG-ARP funding.

2. **Annual Status and Evaluation Report (ASER)**: ICDBG-ARP grantees will be required to submit this report annually to report on its progress in implementing the grant. An ASER will also be required after the ICDBG-ARP grant is fully expended.

3. **Federal Funding Accountability and Transparency Act of 2006:** FFATA requires federal grantees to report information about first tier subawards and executive compensation under Federal assistance awards issued in FY 2011 or later in the Federal Subaward Reporting System (FSRS) available at www.FSRS.gov on all subawards over $30,000. Please see the OMB guidance published at 2 CFR part 170. Additional information is forthcoming.

Additional Reporting: Section 15011 of the CARES Act is noted in the Notice but *will not be* required for ICDBG-ARP funds.

General Resources

HUD Guidance on Eligible Uses for Community Development Block Grant Funds to Support COVID-19 Responses: While the language in the guide specifically references CDBG, ICDBG has the same eligible activities, and therefore the guide can be considered applicable for both programs.

ONAP COVID-19 Recovery Programs website: https://www.hud.gov/program_offices/public_indian_housing/ih/Covid_Recovery

ONAP website, including updated COVID-19 related Frequently Asked Questions: https://www.hud.gov/codetalk

HUD COVID-19 Resources and Fact Sheets: https://www.hud.gov/coronavirus

List of Indian Entities Recognized and Eligible to Receive Service from the United States Bureau of Indian Affairs" (85 FR 5462 published January 3, 2020): https://www.federalregister.gov/d/2020-01707.

Application Submission Reminders

- **Grantees can apply to either Phase One or Phase two, not both.**

- If funds remain for Phase Three, ONAP will advise grantees by Dear Tribal Leader Letter after Phases One and Two are funded.

- Thoroughly review the ICDBG-ARP Implementation Notice, PIH Notice 2021-22.

- Make sure you can open all required forms sooner rather than later.

- Make sure to address the citizen participation requirement as soon as possible.

- Tribal organizations that cannot get a Tribal resolution prior to applying, include a waiver request with the application and a justification for the waiver request.

- Remember this program is similar to ICDBG-CARES but it is not the same.

- ONAP anticipates awarding Phase One by Nov. 17 and Phase Two by Dec. 16, 2021.

Thank you for joining today's ICDBG-ARP Training.

Questions can be sent to
ICDBGARP@hud.gov

Or Contact your Area ONAP